



PLANNING COMMISSION MEETING

August 1, 2017

6:00 PM

Administration Building,
4th Floor, BCC Meeting Room, 477 Houston Street,
Green Cove Springs, FL 32043

Pledge of Allegiance

Call to Order

1. **Approval of Minutes**

Approval of Minutes for July 6, 2017

Public Comment

Public Hearings

Old Business/New Business

1. Evaluation and Appraisal Report - Presentation of Data Analysis and Draft Policies
The purpose of this presentation is to allow the Planning Commission the opportunity to provide input on the proposed changes to the Goals, Objectives and Policies.
2. Public Hearing to Consider Revisions to Article XIII, Floodplain Management Regulations
Staff is proposing several revisions to the Floodplain Management Ordinance to provide clarification and additional requirements for development within a floodplain.
3. Public Hearing to Consider Amendments to Land Development Code to Remove 750 s.f. Minimum Living Area in AG and AR Zoning Districts
The proposed ordinance amends the Land Development Code to no longer require 750 square feet minimum living area for dwelling units in Agriculture and Agriculture/Residential zoning.

Public Comment

Adjournment

In accordance with the Americans with Disabilities Act, any person needing a special accommodation to participate in this matter should contact the Clay County ADA Coordinator by mail at Post Office Box 1366, Green Cove Springs, FL 32043, or by telephone at number (904) 269-6347 no later than three (3) days prior to the hearing or proceeding for which this notice has been given. Hearing impaired persons can access the foregoing telephone number by contacting the Florida Relay Service at 1-800-955-8770 (Voice), or 1-800-955-8771 (TDD).



Agenda Item
PLANNING COMMISSION

Clay County Administration Building
Tuesday, August 1 6:00 PM

TO: Planning
Commission

DATE: 7/24/2017

FROM: Teresa
Capo

SUBJECT:

AGENDA ITEM
TYPE:

ATTACHMENTS:

	Description	Type	Upload Date	File Name
▣	PC Minutes July 6, 2017	Backup Material	7/24/2017	PC_Minutes_Packet_07-06-17.pdf



PLANNING COMMISSION MINUTES

July 6, 2017

7:00 PM

Administration Building,
4th Floor, BCC Meeting Room, 477 Houston Street,
Green Cove Springs, FL 32043

Call to Order

Present

Joe Anzalone, Chairman
Belinda Johnson, Vice Chairman
Ralph Puckhaber
Scott Westervelt
James Fossa, CCSB

Absent

Richard Fain
Michael Bourré
Brenda Kicsak
Major Ryan Leonard, Camp Blanding

Staff Present:

Courtney Grimm, County Attorney
Ed Lehman, Director of Planning & Zoning
Chad Williams, Zoning Chief
Teresa Capo, Recording Secretary

1. **Approval of Minutes**

Vice Chairman Johnson made the motion to approve the minutes for June 6, 2017. Commissioner Westervelt seconded the motion which carried 5-0.

Commissioner Westervelt made the motion to approve the Planning Commission Workshop minutes for June 6, 2017. Vice Chairman Johnson seconded the motion which carried 5-0.

Public Comment

James Otto, 2910 Blanding Blvd, Middleburg, addressed the Commission.

Public Hearings

1. **Public Hearing for Zoning Application Z-17-05, AR to PS-1 (4503 Spring Bank Road). Applicant is requesting a change in zoning for a future church.**

Chad Williams, Zoning Chief, informed the Commission of Application Z-17-05, which is a change in zoning from AR (Agricultural Residential District) to PS-1

(Private Services District) in order to develop the property as a church. Mr. Williams stated that the church is currently located within 1500' of the property and that the current site location is too small to accommodate any future expansion.

In closing, Mr. Williams stated that staff has reviewed the application and has determined that the change in zoning is consistent with the Comprehensive Plan and compatible with the surrounding area.

Staff recommended approval of Z-17-05.

Chairman Anzalone opened the public hearing.

Mike Miracle, 4502 Spring Bank Road, Green Cove Springs, adjacent property owner to the church, spoke against the proposed application.

James Otto, 2910 Blanding Blvd, Middleburg, spoke against the proposed application.

Kelly Hartwig, 3545 Oglebay Drive, Green Cove Springs, Applicant, answered questions posed by the Commission.

Following a brief discussion, Chairman Anzalone closed the public hearing.

With no further discussion, Vice Chairman Johnson made the motion to recommend approval of the rezoning, to include staff comments and recommendations, along with their findings and conclusions. Commissioner Westervelt seconded the motion which carried 4-0.

2. **Public Hearing for Zoning Application Z-17-06, PS-3 to PS-5 (Professional Center Drive)**

Chad Williams, Zoning Chief, informed the Commission of Application Z-17-06, which is a change in zoning from PS-3 (Private Services District) to PS-5 (Private Services District) in order to develop an assisted living facility.

In closing, Mr. Williams stated that staff has reviewed the application and has determined that the change in zoning is consistent with the Comprehensive Plan and compatible with the surrounding area.

Staff recommended approval of Z-17-06.

Chairman Anzalone opened the public hearing.

Alberta Hipps, 1650 Margaret St., Jacksonville, Applicant, addressed the Commission and stated that she was available for questions.

Chairman Anzalone closed the public hearing.

After a brief discussion, Commissioner Westervelt made the motion to recommend approval of the rezoning, to include staff comments and recommendations, along with their findings and conclusions. Vice Chairman Johnson seconded the motion which carried 4-0.

3. **Public Hearing to Consider Zoning Application Z-17-07, BA to BB-2 (1014 Blanding Blvd) Applicant is requesting a change in zoning to allow for a roofing contractor office.**

Chad Williams, Zoning Chief, informed the Commission of Application Z-17-07, which is a change in zoning from BA (Neighborhood Business District) to BB-2 (Community Business District) in order to locate a roofing contractor's office.

In closing, Mr. Williams stated that staff has reviewed the application and has determined that the change in zoning is consistent with the Comprehensive Plan and compatible with the surrounding area.

Staff recommended approval of Z-17-07.

Brief discussion followed with questions from Vice Chairman Johnson and Commission Puckhaber.

The Applicant made no comments to the Commission with regard to the proposed application.

Chairman Anzalone opened the public hearing.

James Otto, 2910 Blanding Blvd, Middleburg, addressed the Commission.

Chairman Anzalone closed the public hearing.

Clark Briggs, Jr., 1966 Lake Shore Drive North, Fleming Island, Applicant, answered questions from Commissioner Puckhaber.

With no further discussion, Commissioner Westervelt made the motion to recommend approval of the rezoning, to include staff comments and recommendations, along with their findings and conclusions. Vice Chairman Johnson seconded the motion which carried 4-0.

Old Business/New Business

Ed Lehman, Director of Planning & Zoning, reminded the Commission of the upcoming EAR Workshop on Tuesday, July 11, 2017 at 6:00 P.M. with the Board of County Commissioners.

Public Comment

James Otto, 2910 Blanding Blvd, Middleburg, addressed the Commission.

With no further discussion, the meeting adjourned at 7:34 P.M.

Teresa Capo
Recording Secretary

Joe Anzalone
Chairman



Agenda Item
PLANNING COMMISSION

Clay County Administration Building
Tuesday, August 1 6:00 PM

TO: Planning Commission

DATE: 7/26/2017

FROM: Edward Lehman

SUBJECT: The purpose of this presentation is to allow the Planning Commission the opportunity to provide input on the proposed changes to the Goals, Objectives and Policies.

AGENDA ITEM TYPE:

ATTACHMENTS:

Description	Type	Upload Date	File Name
▢ Memo to Planning Commission	Cover Memo	7/26/2017	PC_Memo_8-1-17.docx
EX B 2040			
▢ Support Housing Element	Backup Material	7/26/2017	EX_B_2040_Support_Housing_Element.docx
EX B 2040			
▢ Update Housing Element	Backup Material	7/26/2017	EX_B_2040_Update_Housing_Element.docx
EX D 2040			
▢ Support Conservation Element	Backup Material	7/26/2017	EX_D_2040_Support_Conservation_Element.docx
EX D 2040			
▢ Update Conservation Element	Backup Material	7/26/2017	EX_D_2040_Update_Conservation_Element.docx
EX E 2040			
▢ Support Intergovernmental Element	Backup Material	7/26/2017	EX_E_2040_Support_Intergovernmental_Element.docx
EX E 2040			
▢ Update Intergovernmental Element	Backup Material	7/26/2017	EX_E_2040_Update_Intergovernmental_Element.docx
EX H 2040			
▢ Support Historic Element	Backup Material	7/26/2017	EX_H_2040_Support_Historic_Element.docx
EX H 2040			
▢ Update Historic Element	Backup Material	7/26/2017	EX_H_2040_Update_Historic_Preservation_Element.docx

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- EX J 2040
Support
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Development
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- EX K 2040
Support Public
School Element

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- EX K 2040
Update Public
School Element

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- Planning District
Map

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7/26/2017 Planning_Dist_Map_1_8x11.pdf
- Presentation

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Material

8/9/2017 EAR_PC_1.pdf



**Department of Economic
and Development Services**

Memorandum

To: Planning Commission
From: Edward Lehman, Director of Planning and Zoning
Date: July 26, 2017
Re: Evaluation and Appraisal Report Comprehensive Plan Update – Data and Analysis and Draft Policies

At the August 1st Planning Commission Meeting, staff will review the data and analysis and proposed changes to the Goals, Objectives, and Policies for the Conservation, Economic Development, Historical, Housing, Intergovernmental Coordination, Recreation and Open Space and Public School Facilities Elements. The updated data and analysis with the proposed policy changes and a clean version of the policies (without strikethrough and underline) for each of the Elements have been provided as a separate attachment to this agenda item.

The purpose of the presentation is to allow the Planning Commission the opportunity to provide input on the proposed changes to the Goals, Objectives and Policies. The remaining Elements will be presented at the September meeting at which time a vote for transmittal of all Elements will be requested.

HOUSING ELEMENT SUPPORT DOCUMENT

Data, Inventory & Analysis

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A. Introduction

The purpose of the Housing Element is to establish a frame of reference for public policies that will guide Clay County's efforts to provide its citizens with safe, affordable housing. Clay County's resident population is projected to continue to grow by 43% over the next planning period (through the year 2040) and this Element is concerned with providing adequate and affordable housing to a wide range of people with varying income levels and special housing needs. Clay County will continue to encourage development of additional dwelling units by both the public and private sector. The Housing Element is intended to protect and reinvigorate the existing housing stock, in addition to addressing the needs of those residents whose housing needs are not being met by the private sector. The Housing Element, through an analysis of existing conditions and trends, guides the County in its efforts to provide safe, affordable housing for the future residents of Clay County.

Housing demand is a function of three primary forces: population growth, internal shifting of current residents from house to house, and replacement of dwelling units removed from the available housing stock by demolition or conversion to other land uses. Availability of jobs and a good quality of life attract new residents to the Jacksonville metropolitan region. Clay County constitutes a relatively small portion of the regional economy and housing market. Portions of Clay County serve as bedroom communities to the City of Jacksonville with excellent vehicular access to employment centers, goods and services, recreation and entertainment venues. The County is also home to many active duty service members who are stationed at Jacksonville Naval Air Station and Naval Station Mayport. As the national and regional economies continue to improve, the need for workforce housing in certain areas of Clay County will continue to increase in the coming years. "Workforce" refers to households earning less than 120% of the Area Median Income. Only by addressing proper planning now can future residents be assured of proper housing.

Chapter 163.3177(f), Florida Statutes specifies the Housing Element must address the following:

- The provision of housing for all current and anticipated future residents of the County;
- The elimination of substandard dwelling conditions;
- The structural and aesthetic improvement of existing housing;
- The provision of adequate sites for future housing (including workforce housing);
- Housing for very low-income, low-income, moderate-income families, mobile homes, and group home and foster care facilities, with supporting infrastructure and public facilities;
- Provision for relocation housing and identification of historically significant and other housing for purposes of conservation, rehabilitation, or replacement;
- The formulation of housing implementation programs;
- The creation or preservation of workforce housing to minimize the need for additional local services and avoid the concentration of workforce dwelling units only in specific areas of the County;
- Energy efficiency in the design and construction of new housing; and
- Use of renewable energy resources.

Most of the information in this Support Document was collected by using the data provided by the Florida Housing Data Clearinghouse which was founded in 2000 to provide public access to data on Florida's housing needs and supply, subsidized rental housing, and household demographics. Sources of the data available from FHDC include the U.S. Census, other federal population and housing surveys, the U.S. Department of Housing and Urban Development, the U.S. Department of Agriculture Rural Housing Service, Florida Housing Finance Corporation, local housing finance authorities, public housing agencies, the Florida Association of Realtors, the Florida Department of Revenue, the Florida Agency for Workforce Innovation, and the Bureau of Economic and Business Research at the University of Florida.

B. Existing Regulatory and Funding Framework

Federal

There are a number of subsidized housing programs at the federal level funded through the U.S. Department of Housing and Urban Development (“HUD”). Major programs include conventional public housing programs, Section 8, Section 202, Section 312, Section 221d3, and Section 236. Some of these programs are not currently being funded for new construction; however, dwelling units constructed or rehabilitated through these programs in the past continues to serve existing occupants and new low-income households when vacancies occur. Federal government housing assistance has been aimed in large part toward the elderly with moderate incomes, so that they can afford good housing through direct rental assistance.

The Community Development Block Grant Program is a federal program that provides funding for housing and community development. In 1974, Congress created the program by passing the Housing and Community Development Act, Title I. The three national objectives of the program are to benefit low and moderate-income persons; prevent or eliminate slum or blight; and address urgent community development needs.

The HOME Investment Partnerships Program provides formula grants to states and localities that communities use – often in partnership with local nonprofit groups – to fund a wide range of activities including building, buying, and/or rehabilitating affordable housing for rent or homeownership or providing direct rental assistance to low-income people. HOME is the largest federal block grant to state and local governments designed exclusively to create affordable housing for low-income households. HOME funds are awarded annually as formula grants to participating jurisdictions. The program's flexibility allows states and local governments to use HOME funds for grants, direct loans, loan guarantees or other forms of credit enhancements, or rental assistance or security deposits. Locally, the Jacksonville-Duval, Clay Counties Continuum of Care Program provides funding to provide permanent housing, transitional housing, supportive services, and, in some cases, homelessness.

The Housing Credit program provides for-profit and nonprofit organizations with a dollar-for-dollar reduction in federal tax liability in exchange for the acquisition and substantial rehabilitation, substantial rehabilitation, or new construction of low and very low income rental dwelling units. Eligible development types and corresponding credit rates include: new construction, 9%; substantial rehabilitation, 9%; acquisition, 4%; and federally subsidized, 4%. A Housing Credit allocation to a development can be used for ten consecutive years once the development is placed in service. Qualifying buildings include garden, high-rise, townhouses, duplexes/quads, single-family or mid-rise with elevator. Ineligible development types include hospitals,

sanitariums, nursing homes, retirement homes, trailer parks, and life care facilities. This program can be used in conjunction with HOME, the State Apartment Incentive Loan program, the Predevelopment Loan program, or the Multifamily Mortgage Revenue Bonds program. Each development must set aside a minimum percentage of the total units for eligible low or very low-income residents for the duration of the compliance period, which is a minimum of thirty years with the option to convert to market rates after the fourteenth year. At least 20% of the dwelling units must be set aside for households earning 50% or less of the Area Median Income (“**AMI**”) or 40% of the units must be set aside for households earning 60% or less of the AMI. Housing need is assessed annually based on current statewide market studies and public input, and funds are distributed annually to meet the need and demand for targeted housing in large, medium, and small-sized counties throughout Florida. Additionally, housing credits are sometimes reserved for affordable housing that addresses specific geographic or demographic needs, including the elderly, farmworkers and commercial fishing workers, urban infill, the Florida Keys, Front Porch Florida communities, or developments funded through the U.S. Department of Agriculture Rural Development.

State of Florida

The Florida Housing Finance Corporation offers financing for developers who reserve a certain percentage of their housing developments for households with low and moderate incomes. The most used state programs in the development of multi-family affordable housing are the State Apartment Incentive Loan (“**SAIL**”), the Housing Credits Program, and the Multi-family Bond Program.

The Florida Housing Finance Corporation administers the State Housing Initiatives Partnership (“**SHIP**”) Program which provides funds to local governments as an incentive to create partnerships that produce and preserve affordable homeownership and multi-family housing. The program was designed to serve very low-, low- and moderate-income families. Funding for this program was established by the passage of the 1992 William E. Sadowski Affordable Housing Act. These funds are derived from the collection of documentary stamp tax revenues, which are deposited into the Local Government Housing Trust Fund. Total actual disbursements are dependent upon these documentary stamp collections. SHIP funds are distributed each month on a population-based formula to all sixty-seven counties and fifty-three Community Development Block Grant entitlement cities in Florida. The minimum allocation is \$350,000 and in order to participate, local governments must establish a local housing assistance program by ordinance; develop a local housing assistance plan and housing incentive strategy; amend the land development regulations or establish local policies to implement the incentive strategies; form partnerships and combine resources in order to reduce housing costs; and ensure that rent or mortgage payments do not exceed 30% of the Area Median Income (“**AMI**”), unless authorized by the mortgage lender.

SHIP dollars may be used to fund emergency repairs, new construction, rehabilitation, down payment and closing cost assistance, impact fees, construction and gap financing, mortgage buy-downs, acquisition of property for affordable housing, matching dollars for federal housing grants and programs, and homeownership counseling. SHIP funds may be used to assist dwelling units that meet the standards of Chapter 553, Florida Statutes.

A minimum of 65% of the funds must be spent on eligible homeownership activities; a minimum of 75% of funds must be spent on eligible construction activities; at least 30% of the funds must be reserved for very low-income households (up to 50% of AMI); an additional 30% may be reserved for low-income households (up to 80% of AMI); and the remaining funds may be

reserved for moderate-income households (up to 120% of AMI). It is important to note that no more than 5% of SHIP funds may be used for administrative expenses. However, if a local government makes a finding of need by resolution, a local government may use up to 10% for administrative expenses.

Local Administration

Clay County recognizes the need to provide opportunities for lower income residents to obtain housing. Emergency rental assistance can help those who require immediate aid to prevent homelessness, while long-term assistance can help those lower income residents who may have special needs and are unable to attain housing on their own. Assistance to qualified home buyers, such as down payment assistance, is also available. Administration of the various housing assistance programs available has been assigned to Clay County Housing Finance Authority ("CCHFA") and Clay County SHIP Office.

The CCHFA manages locally available federal and state monetary resources devoted to addressing affordable housing. Funding sources can include the federal Low Income Housing Tax Credits and grants from HUD, the SHIP program, and the SAIL program. SHIP funds have been appropriated for several sub-programs or strategies. SHIP funds provide Clay County with a dedicated source of revenue, which must be used exclusively for affordable housing programs. The CCHFA provides construction loans with favorable terms to developers who in turn construct affordable for-sale housing. Such loans are typically financed through the sale of 30-year tax-free bonds. The SHIP program offers three main types of assistance for low- and moderate-income households in Clay County:

- Down payment assistance for first time homebuyers,
- Home repair assistance, and
- Partnerships with non-profit housing providers for elderly and special needs housing.

Clay County SHIP has successfully upgraded the quality of living standards by providing safe, decent, improved and affordable housing for the county's elderly, special needs, and income eligible families. Homes purchased with SHIP assistance cannot exceed \$180,000 in purchase price, a price that is becoming increasingly rare in Clay County. The Clay County SHIP program is further constrained by funding levels; the program is funded at the state level and funding levels have been cut, with more cuts projected in the future.

Eligibility for SHIP and HOME assistance is open to all households whose incomes are certified to be within the very low, low, and moderate-income categories established annually HUD. These are adjusted for household size and published annually.

The Comprehensive Plan currently allows for density bonuses that are tied to affordable housing using a Weighted Point System under Housing Element Policy 1.3.6. However, Future Land Use Element Policy 1.8.5 restricts the maximum allowable density under this bonus program to Traditional Neighborhood Development within lands designated on the Future Land Use Map as either Urban Core or Urban Fringe, or property rezoned to Planned Unit Development pursuant to criteria contained in the same Policy. This policy could potentially limit development of affordable units.

Non-profit housing providers can be a valuable way of providing affordable housing. Currently, Clay County Habitat for Humanity ("CCHH") is the only non-profit housing provider that is active in Clay County. CCHH relies on volunteer labor and donation of materials for the construction of

homes. Homes are sold to qualified very-low and low-income homebuyers with no-interest financing.

C. Overview of Housing Stock

This data and analysis provides information on Clay County's housing characteristics. The primary data sources for this information were the Florida Housing Data Clearinghouse, Shimberg Center for Housing Studies, the United States Census Bureau, and the American Community Survey ("ACS") 2011-2015. This section focuses on the composition of housing, vacancy rates, housing tenure, age of the housing stock, value of owner-occupied dwelling units, housing costs, and rental costs. It is important to note that the four incorporated municipalities within Clay County (Green Cove Springs, Orange Park, Penney Farms, and Keystone Heights) have developed their own housing elements within their respective comprehensive plans that supplement and support the County's initiatives. Where available, Census Tract level data is utilized to divide data among the County's seven (7) Planning Districts, depicted on the next page, and then exclude the aforementioned municipalities yielding the total unincorporated portion of the County.

Planning District	Green Cove Springs	Middleburg/ Clay Hill	Keystone Heights	Orange Park	Penney Farms/ Lake Asbury	Fleming Island	Doctors Inlet/ Ridgewood
Census Tract	31300	30102	31101	30301	31200	30701	30201
	31400	30103	31104	30303		30702	30302
	31500	30104	31105	30304		30703	30203
			31106	30400			30801
			31108	30500			30802
				30600			30902
							30903
							30904

Housing Units

According to the 2010 Census-based ACS there are an estimated 68,866 year-round dwelling units in unincorporated Clay County. Single-family detached homes are the predominant housing type in the County accounting for nearly three quarters of the total housing stock. It should be noted, however, that over the past decade the County's mix of housing types has greatly improved as the proportion of single-family detached dwellings units has decreased from 88% to 71%.

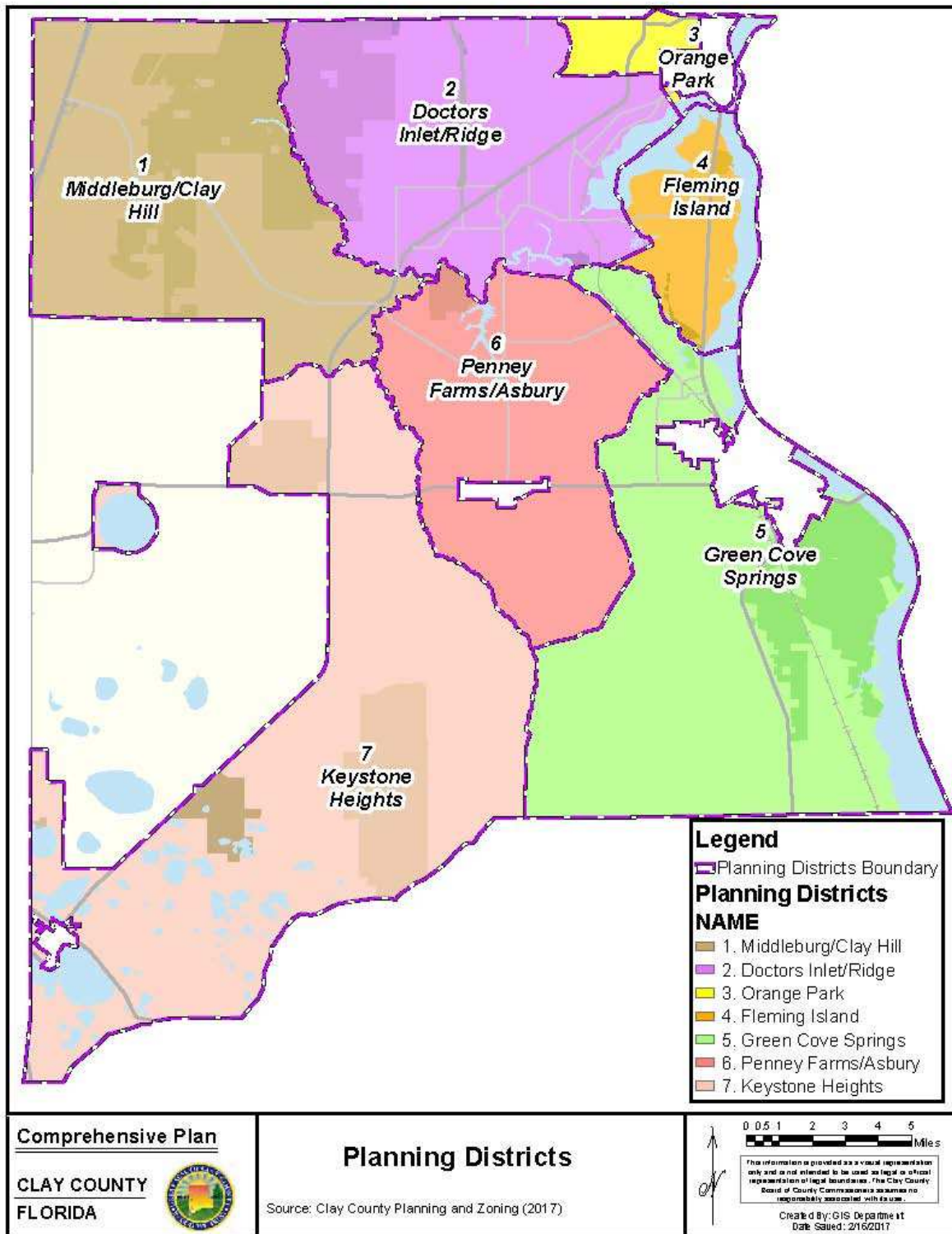


Table 1 – Dwelling Units by Type

Planning District	Total Units	Single-Family Detached		Mobile Homes, RVs, Vans, etc.		Single-Family Attached and Multi-Family	
		Units	Percent	Units	Percent	Units	Percent
Middleburg / Clay Hill	6,849	2,753	40.2%	3,986	58.2%	110	1.6%
Doctors Inlet / Ridgewood	26,947	21,647	80.3%	1,440	5.3%	3,860	14.3%
Orange Park	7,011	4,382	62.5%	26	0.4%	2,603	37.1%
Fleming Island	12,566	9,870	78.5%	136	1.1%	2,560	20.4%
Green Cove Springs	3,151	1,885	59.8%	852	27.0%	414	13.1%
Penney Farms / Lake Asbury	5,253	4,279	81.5%	588	11.2%	386	7.4%
Keystone Heights	7,089	4,034	56.9%	2,882	40.7%	173	2.4%
Total Unincorporated County	68,866	48,850	-	9,910	-	10,106	-

Source: U.S. Census Bureau, 2011-2015 American Community Survey 5-Year Estimates, Selected Housing Characteristics, DP04

The largest number of single-family detached dwelling units continues to be located within the Doctors Inlet/Ridgewood Planning District. The largest number of single-family attached and multi-family dwelling units is also concentrated in the Doctors Inlet/Ridgewood Planning District. These conditions are indicative of strong development trends and population growth in this Planning District due to its close proximity to employment opportunities and regional transportation linkages that provide greater access to employment. The Middleburg/Clay Hill and Keystone Heights Planning Districts continue to contain the largest number of mobile homes with most of those dwellings scattered over a broad geographic area rather than in mobile home parks.

Housing Occupancy and Tenure

Of the 68,866 year-round dwelling units identified by the U.S. Census Bureau, 62,077 were occupied; this results in a 90% occupancy rate for the County. **Table 2** presents the most recent estimates of dwelling units by tenure by Planning District. The most recent vacancy rates for the County range from 3.9% to 18% with the average County vacancy rate of 10.8%. With the exception of the Penney Farms/Lake Asbury Planning District, the vacancy rate increased throughout unincorporated Clay County since 2007, doubling in some cases.

The highest percentage of vacant dwelling units continues to be found in the Keystone Heights Planning District, but there are surprising increases in both the Middleburg/Clay Hill and Green Cove Springs Planning Districts. Also, the Doctors Inlet/Ridgewood Planning District's increase from 3.7% in 2007 to 8.4% in 2015 while not as large a vacancy rate as others, is dramatic given that district historically has the tightest housing market caused by high demand, constrained production, or a combination of the two. The proportion of dwelling units occupied by owners versus renters has remained practically the same since 2007.

Table 2 – Housing Occupancy and Tenure

Planning District	Dwelling Units	Occupied Units	Owner-Occupied Units	Renter-Occupied Units	Vacant Units	Percentage Vacant	
						2015	2007
Middleburg / Clay Hill	6,849	5,930	4,392	1,538	919	13.4%	6.7%
Doctors Inlet / Ridgewood	26,947	24,672	19,316	5,356	2,275	8.4%	3.7%
Orange Park	7,011	6,320	3,262	3,058	691	9.9%	5.2%
Fleming Island	12,566	11,587	9,032	2,555	979	7.8%	4.4%
Green Cove Springs	3,151	2,707	1,967	740	444	14.1%	8.5%
Penney Farms / Lake Asbury	5,253	5,046	4,345	701	207	3.9%	4.9%
Keystone Heights	7,089	5,815	4,910	905	1,274	18.0%	15.7%
Total Unincorporated County	68,866	62,077	47,224	14,853	6,789	-	-

Source: U.S. Census Bureau, 2011-2015 American Community Survey 5-Year Estimates, Selected Housing Characteristics, DP04

The Doctors Inlet/Ridgewood Planning District continues to have the highest percentage of vacant units. This area also has the largest number of year round dwelling units, serving as the major population center for Clay County.

Table 3 – Housing Occupancy

Planning District	Occupied Units	Vacant Units	Homeowner Vacancy Rate	Rental Vacancy Rate
Middleburg / Clay Hill	5,930	919	2.4%	1.4%
Doctors Inlet / Ridgewood	24,672	2,275	1.3%	8.4%
Orange Park	6,320	691	2.1%	6.9%
Fleming Island	11,587	979	2.8%	2.0%
Green Cove Springs	2,707	444	4.6%	2.9%
Penney Farms / Lake Asbury	5,046	207	7.6%	3.8%
Keystone Heights	5,815	1,274	1.8%	4.7%
Total Unincorporated County	62,077	6,789	3.2%	5.7%

Source: U.S. Census Bureau, 2011-2015 American Community Survey 5-Year Estimates, Selected Housing Characteristics, DP04

Table 4 – Average Household Size

Planning District	Persons per Household		
	Owner-Occupied	Renter-Occupied	Combined
Middleburg / Clay Hill	2.77	3.33	3.05
Doctors Inlet / Ridgewood	2.93	2.95	2.94
Orange Park	2.49	2.65	2.57
Fleming Island	2.91	3.36	3.14
Green Cove Springs	2.75	2.36	2.56
Penney Farms / Lake Asbury	2.76	2.25	2.51
Keystone Heights	2.62	2.59	2.61
Total Unincorporated County	2.75	2.78	2.77

Sources: U.S. Census Bureau, 2011-2015 American Community Survey 5-Year Estimates, Selected Housing Characteristics, DP04
Florida Housing Data Clearinghouse, Affordable Housing Needs Assessment – Quick Report

Table 5 – Age of Population

Planning District	Under 5 Years	5 to 19 Years	20 to 44 Years	45 to 64 Years	65 years and over	Total
Middleburg / Clay Hill	1,073	3,225	5,530	5,191	2,268	17,287
Doctors Inlet / Ridgewood	4,340	18,333	25,321	18,474	7,993	74,461
Orange Park	1,061	2,923	5,867	4,145	2,376	16,372
Fleming Island	1,608	8,917	9,416	10,460	4,532	34,933
Green Cove Springs	333	1,014	2,110	2,466	1,112	7,035
Penney Farms / Lake Asbury	728	2,809	4,120	4,242	2,011	13,910
Keystone Heights	837	2,495	3,913	5,069	2,857	15,171
Total Unincorporated County	9,980	39,716	56,277	50,047	23,149	179,169

Source: U.S. Census Bureau, 2011-2015 American Community Survey 5-Year Estimates, ACS Demographic and Housing Estimates, DP05

Age of Housing Stock

Table 6 indicates the age of the existing housing stock in unincorporated Clay County. About 91% of the housing stock has been built since 1970, the opening of the Buckman Bridge providing a direct connection between Clay County and the City of Jacksonville, sparking a rapid population growth in Clay County. The age of the housing stock is an important indicator of growth in the County and also has a direct impact on housing conditions as older homes generally require more maintenance. Based on the age of the housing stock, the County experienced a significant amount of housing growth in the past two decades, which started tapering off in the early part of this decade. In general, the vast majority of the County's housing stock located outside the limits of its four municipalities was built between 2000 and 2009.

Housing constructed prior to 1940, a commonly used measure of distressed housing, represents slightly less than 1% of the current housing stock, thus unincorporated Clay County does not appear to have a significant proportion of distressed units based on this measure. In the past, the Green Cove Springs Planning District had by far and away the most distressed housing based on this measure. Currently, though, the Doctors Inlet/Ridgewood Planning District has the most, with the Green Cove Springs and Keystone Heights Planning Districts have nearly the same amount of distressed units.

Table 6 – Year Structure Built

Year Built	Total Unincorporated County	Planning Districts						
		Middleburg/ Clay Hill	Doctors Inlet/ Ridgewood	Orange Park	Fleming Island	Green Cove Springs	Penney Farms/ Lake Asbury	Keystone Heights
2014 and later	119	0	119	0	0	0	0	0
2010-2013	1,275	14	788	7	121	50	253	42
2000-2009	22,294	1,244	10,145	344	5,712	831	2,465	1,553
1990-1999	14,951	1,963	4,579	1,006	4,022	668	839	1,874
1980-1989	15,177	2,007	6,047	2,424	2,133	384	696	1,486
1970-1979	8,675	1,106	3,619	1,570	312	401	725	942
1960-1969	3,648	237	1,021	1,259	237	298	162	434
1950-1959	1,583	165	285	278	0	259	0	576
1940-1949	536	104	100	92	29	131	25	55
1939 and earlier	628	9	244	31	0	129	88	127
Total	68,866	6,849	26,947	7,011	12,566	3,151	5,253	7,089

Source: U.S. Census Bureau, 2011-2015 American Community Survey 5-Year Estimates, Selected Housing Characteristics, DP04

Deficient Housing Structures

Over 90% of the housing in unincorporated Clay County was built after 1970. Since less than 10% of the County's housing stock was built before 1970, there are few age-related problems with the County's housing stock. Also, residential construction during this period has complied with the Florida Building Code and the placement of new mobile home dwelling units in the County has been regulated. Construction for modular has complied with the U.S. Department of Housing and Urban Development's standard for manufactured housing and the Florida Building Code. **Table 7** presents Census-based counts of dwelling units lacking complete plumbing and kitchen facilities and lacking telephone service. Housing with these characteristics is considered substandard.

The Fleming Island Planning District contains the largest number of units lacking complete facilities, while the Keystone Heights Planning District lacks the most plumbing facilities compared to the other districts. However, the absolute number of units in these two substandard conditions is fairly small (less than 1% of the occupied dwelling units) and it is not an issue of major concern in unincorporated Clay County.

Table 7 – Dwelling Units Lacking Complete Plumbing, Kitchen Facilities, and Telephone Service

Planning District	Occupied Dwelling Units	Lacking Complete Plumbing Facilities		Lacking Complete Kitchen Facilities		No Telephone Service Available	
		Number	Percent	Number	Percent	Number	Percent
Middleburg / Clay Hill	5,930	25	0.4%	62	1.1%	212	3.6%
Doctors Inlet / Ridgewood	24,672	0	0.0%	30	0.1%	266	1.1%
Orange Park	6,320	17	0.2%	54	0.6%	248	3.9%
Fleming Island	11,587	29	0.3%	169	1.5%	164	1.4%
Green Cove Springs	2,707	9	0.2%	0	0.0%	42	1.6%
Penney Farms / Lake Asbury	5,046	0	0.0%	0	0.0%	54	1.0%
Keystone Heights	5,815	53	0.9%	61	1.0%	99	1.7%
Total Unincorporated County	62,077	133		376		1,085	

Source: U.S. Census Bureau, 2011-2015 American Community Survey 5-Year Estimates, Selected Housing Characteristics, DP04

The Census Bureau calculates a person per room measure by dividing the number of persons in each occupied housing unit by the number of rooms in the unit. An "overcrowded condition" is considered to exist when the ratio is 1.01 persons or more per room. In the unincorporated portion of Clay County, slightly more than 2% of occupied dwelling unit were counted as being overcrowded. The largest number of overcrowded dwelling units is in the Doctors Inlet/Ridgewood Planning District; however the Planning District with the largest percentage of their occupied units meeting the definition of substandard is Middleburg/Clay Hill.

Table 8 – Overcrowded Dwelling Units

Planning District	Occupied Dwelling Units	Units with 1.01 or More Occupants Per Room	Percent of Total
Middleburg / Clay Hill	5,930	208	3.51%
Doctors Inlet / Ridgewood	24,672	443	1.80%
Orange Park	6,320	172	2.72%
Fleming Island	11,587	317	2.74%
Green Cove Springs	2,707	70	2.59%
Penney Farms / Lake Asbury	5,046	72	1.43%
Keystone Heights	5,815	114	1.96%
Total Unincorporated County	62,077	1,396	2.25%

Source: U.S. Census Bureau, 2011-2015 American Community Survey 5-Year Estimates, Selected Housing Characteristics, DP04

Housing Costs and Affordability

Housing affordability is defined in terms of monthly housing cost in comparison to monthly income. A widely accepted standard for determining affordability is that housing costs (rent or mortgage plus utilities) should not exceed 30% of household income. This threshold is commonly used for determining federal housing subsidies as well as for credit underwriting purposes. Housing affordability in both the owner and renter markets has been a vexing issue throughout the State of Florida for decades. This section examines the issues that have affected Clay County residents and may portend to affect them during the next planning period through the year 2040.

The median sales price for single-family homes has fluctuated dramatically during the economic boom, the Great Recession, and post-recession years. From \$120,000 in 2000, the median sales price for single-family homes in Clay County (including the incorporated areas) climbed during the real estate boom to over \$226,000 in 2006. After five years of decline following that peak, the median sales price for single-family homes has started to increase again reaching \$179,500 in 2016.

Table 9 – Median Sales Price for Single-Family Homes

2000	2005	2006	2007	2008	2009	2010
\$120,000	\$190,000	\$226,350	\$215,500	\$190,000	\$170,350	\$160,000
2011	2012	2013	2014	2015	2016	
\$155,000	\$160,000	\$170,000	\$181,050	\$190,000	\$179,500	

Source: Florida Housing Data Clearinghouse, Housing Profile

Fair Market Rents (“FMRs”) are primarily used to determine standard amounts federal housing assistance and to serve as a rent ceiling in the HOME rental assistance program. HUD’s Office of Policy Development and Research estimates Clay County’s 2017 FMRs as \$617 for a studio apartment, \$791 for a one-bedroom unit, \$969 for a two-bedroom unit, \$1,283 for a three-bedroom unit, and \$1,625 for a four-bedroom unit.

Table 10 shows the number of renter-occupied dwelling units in unincorporated Clay County by gross rent ranges as reported in the 2010 Census-based American Community Survey. The highest median rents are found in the Fleming Island Planning District, representative of the higher cost and the higher demand most likely from transitional military housing. Most of the higher rent properties are located in the Doctors Inlet/Ridgewood and Fleming Island Planning Districts. The lowest rents are found in the Green Cove Springs Planning District, where the median rent of \$741 per month is less than half as much as the median rent in the Fleming Island Planning District (\$1,618 per month). Since the start of the millennium, Clay County’s median rent has risen 55% from \$668 to \$1,034 per month.

Table 10 – Renter-Occupied Units by Gross Rent

Planning District	Less than \$500	\$500 to \$999	\$1,000 to \$1,499	\$1,500 to \$1,999	\$2,000 to \$2,499	\$2,500 to \$2,999	\$3,000 or more	Total Paying Rent	Median	No Rent Paid
Middleburg / Clay Hill	31	808	501	0	0	0	0	1,340	\$887	198
Doctors Inlet / Ridgewood	96	1,699	2,405	840	47	0	0	5,087	\$1,117	269
Orange Park	0	1,912	826	99	69	0	0	2,906	\$909	152
Fleming Island	21	378	1,004	760	240	48	59	2,510	\$1,618	45
Green Cove Springs	46	581	58	0	11	0	0	696	\$741	44
Penney Farms / Lake Asbury	25	240	242	27	0	0	0	534	\$1,053	167
Keystone Heights	10	507	177	13	0	0	0	707	\$914	198
Total Unincorporated County	229	6,125	5,213	1,739	367	48	59	13,780	\$1,034	1,073

Source: U.S. Census Bureau, 2011-2015 American Community Survey 5-Year Estimates, Selected Housing Characteristics, DP04

Table 11 indicates the distribution of specified owner-occupied, non-condominium dwelling units by average value. According to the U.S. Census Bureau, the average value of a single-family dwelling unit in 2016 was \$142,567, well above the average value in 2000 which was \$108,127.

Table 11 – Average Value of Owner-Occupied Dwelling Units

Planning District	Owner-Occupied Units	Less than \$50,000	\$50,000 to \$99,999	\$100,000 to \$149,999	\$150,000 to \$199,999	\$200,000 to \$299,999	\$300,000 to \$499,999	\$500,000 to \$999,999	\$1,000,000 or more	Median
Middleburg / Clay Hill	4,392	644	1,777	766	642	337	194	22	10	\$95,333
Doctors Inlet / Ridgewood	19,316	721	3,243	5,168	5,563	3,500	947	142	32	\$154,563
Orange Park	3,262	130	931	999	456	464	243	32	7	\$129,700
Fleming Island	9,032	223	641	1,398	1,774	2,902	1,698	264	132	\$202,133
Green Cove Springs	1,967	269	404	390	348	250	138	105	63	\$135,600
Penney Farms / Lake Asbury	4,345	216	501	1,036	1,085	1,001	350	156	0	\$164,900
Keystone Heights	4,910	921	1,371	954	741	750	149	24	0	\$115,740
Total Unincorporated County	47,224	3,124	8,868	10,711	10,609	9,204	3,719	745	244	\$142,567

Source: U.S. Census Bureau, 2011-2015 American Community Survey 5-Year Estimates, Selected Housing Characteristics, DP04

Rent or Cost to Income Ratio

The ratio of housing costs to total housing income is an important indicator of housing affordability problems. With respect to rental housing, guidelines of the U.S. Department of Housing and Urban Development set 30% as the maximum proportion of gross income that can be reasonably devoted to all housing expenses, given other family requirements for food, clothing, transportation, etc. Most of the government's housing assistance programs require that a tenant pay up to 30% of their income in rent and utility expenses with subsidies making up the difference.

Traditionally, mortgage underwriting standards require that mortgage principal, interest, taxes and insurance payments be no more than 28 to 30% of household income. These lending requirements have the effect of restraining many homeowners from over-extending their housing budgets. **Table 12** presents 2010 Census-based estimates of monthly costs of owner-occupied dwelling units with mortgages and without mortgages. For the County as a whole, the largest percentage of owner-occupied dwelling units with mortgages is in the \$1,000 to \$1,499 range by far.

Table 12 – Monthly Costs of Owner-Occupied Units with a Mortgage

With a Mortgage									
Planning District	Total Units	Less than \$500	\$500 to \$999	\$1,000 to \$1,499	\$1,500 to \$1,999	\$2,000 to \$2,499	\$2,500 to \$2,999	\$3,000 or more	Median
Middleburg / Clay Hill	2,768	0	1,263	996	292	111	36	70	\$1,079
Doctors Inlet / Ridgewood	14,987	231	2,539	5,671	4,129	1,370	726	321	\$1,367
Orange Park	2,093	34	682	712	460	89	79	37	\$1,201
Fleming Island	6,815	22	509	1,951	2,005	1,362	502	464	\$1,683
Green Cove Springs	1,170	10	277	545	138	123	11	66	\$1,166
Penney Farms / Lake Asbury	2,855	56	368	1,073	793	422	46	97	\$1,447
Keystone Heights	2,877	71	1,319	1,043	291	120	24	9	\$1,038
Total Unincorporated County	33,565	424	6,957	11,991	8,108	3,597	1,424	1,064	-
Without a Mortgage									
Planning District	Total Units	Less than \$250	\$250 to \$399	\$400 to \$599	\$600 to \$799	\$800 to \$999	\$1,000 or more	Median	
Middleburg / Clay Hill	1,624	586	701	282	33	22	0	\$291	
Doctors Inlet / Ridgewood	4,329	553	1,718	1,501	402	72	83	\$413	
Orange Park	1,169	241	474	260	140	28	26	\$395	
Fleming Island	2,217	155	350	724	683	210	95	\$541	
Green Cove Springs	797	273	271	100	103	36	14	\$377	
Penney Farms / Lake Asbury	1,490	197	668	432	95	98	0	\$374	
Keystone Heights	2,033	799	817	298	93	14	12	\$294	
Total Unincorporated County	13,659	2,804	4,999	3,597	1,549	480	230	-	

Source: U.S. Census Bureau, 2011-2015 American Community Survey 5-Year Estimates, Selected Housing Characteristics, DP04

Households that pay more than 30% of their household income on housing are considered to be “cost-burdened” and those that pay more than 50% are considered to be “extremely cost-burdened”. As previously stated, those paying 30% or less than their household income on housing are considered to be paying an affordable amount.

In 2005, approximately 18% of owner-occupied dwelling units and 35% of renter-occupied dwelling units had a housing cost burden in excess of 30%. **Table 13** presents renter costs as a percentage of income for the County. While the percentage of cost-burdened owner-occupied households slightly increased to 20%, the percentage of cost-burdened renter-occupied households has drastically decreased to 10%. Fortunately, the vast majority of households within Clay County are paying less than 30% of their household income on housing. The amount of cost-burdened and extremely cost-burdened households is 24% and 14%, respectively.

Table 13 – Households by Homeowner / Renter Status and Cost Burden

Amount of Income Paid for Housing	Owner	Rental	Total	Household Income as Percentage of Area Median Income				
				30% AMI or Less	30.1 to 50% AMI	50.1 to 80% AMI	80.1 to 120% AMI	More than 120% AMI
30% or Less	38,348	8,175	46,523	739	1,814	5,101	10,556	28,313
30.1 to 50%	7,812	2,868	10,680	405	1,596	3,464	2,833	2,382
More than 50%	6,100	3,354	9,454	4,198	2,935	1,561	566	194
Total Unincorporated County	52,260	14,397	66,657	5,342	6,345	10,126	13,955	30,809

Sources: Florida Housing Data Clearinghouse, Affordable Housing Needs Assessment, University of Florida, Bureau of Economic and Business Research

Special Housing Types

Special housing types address the unique housing needs for certain populations including the elderly, students, and persons with disabilities. These types include subsidized renter-occupied developments, historically significant housing, and group homes. **Table 14** lists the developments within Clay County that currently provide assisted housing units to serve targeted populations, and one development that will soon be operational.

Table 14 – Federally, State and Locally-Assisted Rental Housing

Development Name	Address	Total Units	Assisted Units	Occupancy Status	Housing Program(s)	Population or Target Area
Pine Forest	650 Pine Forest Drive (Fleming Island)	5	-	Not Ready for Occupancy	Legislative Appropriation	Persons with Disabilities
Cove Apartments	840 Cooks Lane (Green Cove Springs)	36	35	Ready for Occupancy	Rental Assistance / RD; Section 515	Family
Clay Springs	101 Joey Drive (Green Cove Springs)	51	51	Ready for Occupancy	Housing Credits 9%; Rental Assistance / RD; Section 515	Family
Governor Springs Apartments	1343 Love Drive (Green Cove Springs)	43	41	Ready for Occupancy	Rental Assistance / RD; Section 515	Family
Highland Apartments	100 West Joey Circle (Green Cove Springs)	52	52	Ready for Occupancy	Rental Assistance / HUD; Section 223(f) Refi / Purchase	Family
Plinewood Apartments	1000 Pinewood Court (Green Cove Springs)	54	53	Ready for Occupancy	Rental Assistance / RD; Section 515	Elderly
Ramblewood Apartments	801 Ferris St. (Green Cove Springs)	13	13	Ready for Occupancy	Rental Assistance / HUD	Family
Middleburg Bluffs Apartments	2425 Iris St. (Middleburg)	45	44	Ready for Occupancy	Section 515	Family
BASCA Group Home 5	2556 Horseshoe Bend Road (Middleburg)	6	6	Not Ready for Occupancy	Legislative Appropriation	Persons with Disabilities
Briarwood	3791 & 3793 County Road 218 (Middleburg)	51	51	Ready for Occupancy	Housing Credits 4%; SAIL; Section 515; State Bonds	Family
Briarwood	3791 & 3793 County Road 218 (Middleburg)	53	53	Ready for Occupancy	Housing Credits 4%; Rental Assistance / RD; SAIL; Section 515; State Bonds	Elderly; Family
Hunter's Run	1535 Blanding Boulevard (Middleburg)	304	304	Ready for Occupancy	Housing Credits 4%; State Bonds	Family
Madison Commons	2285 County Road 220 (Middleburg)	160	160	Ready for Occupancy	Housing Credits 4%; Local Bonds; SAIL	Family
Holly Cove	1745 Wells Road (Orange Park)	202	162	Ready for Occupancy	Housing Credits 4%; SAIL	Family
Middletowne Apartments	1809 DeBarry Ave. (Orange Park)	100	100	Ready for Occupancy	Local Bonds; Rental Assistance / HUD; SAIL	Family
Peoria Project	3205 Peoria Road (Orange Park)	4		Not Ready for Occupancy	Legislative Appropriation	Persons with Disabilities
St Johns Apartments	1801 Jobyna Ave. (Orange Park)	70	69	Ready for Occupancy	Section 515	Family

Source: Florida Housing Data Clearinghouse, Affordable Housing Needs Assessment – Quick Report: Results

The identification and preservation of historic structures creates a vital, vibrant link between yesterday and tomorrow for citizens and visitors alike. The Comprehensive Plan includes a Historical Element. The County will continue to monitor the condition of housing throughout the County and promote appropriate conservation, rehabilitation and demolition activities.

Table 15 – National Register of Historical Places

Site Name	Added	Location	Historic Significance	NRIS Number
Bubba Midden	1990	Fleming Island	Information Potential	90000159
Frosard W. Budington House	1990	3916 Main St., Middleburg	Architecture/Engineering	90000317
George A. Chalker House	1990	2160 Wharf St., Middleburg	Architecture/Engineering	90000315
Clark-Chalker House	1988	3891 Main St., Middleburg	Event	88001701
William Clarke Estate	1998	1039-1057 Kingsley Ave., Orange Park	Event, Architecture/Engineering	98000862
Clay County Courthouse	1975	Brabantio Ave., Green Cove Springs	Event, Architecture/Engineering	75000546
George Randolph Frisbee, Jr. House	1990	2125 Palmetto St., Middleburg	Architecture/Engineering	90000316
Green Cove Springs Historic District	1991	Roughly bounded by Bay St., CSX RR tracks, Center St., Orange Ave., St. Elmo St. and the St. Johns River, Green Cove Springs	Event, Architecture/Engineering	91000281
Joseph Green House	1998	531 McIntosh Ave., Orange Park	Event, Architecture/Engineering	98000860
Haskell--Long House	1990	3858 Main St., Middleburg	Architecture/Engineering	90000314
William Helffrich House	1998	1200 Plainfield Ave., Orange Park	Event, Architecture/Engineering	98000857
Holly Cottage	2010	6935 Old Church Rd, Green Cove Springs	Event, Architecture/Engineering	10000442
Memorial Home Community Historic District (aka Penney Retirement Community)	1999	Roughly bounded by FL 16, Caroline Blvd., Wilbanks Ave., and Studio Rd., Penney Farms	Person, Event, Architecture/Engineering	99000047
Methodist Episcopal Church at Black Creek (aka Middleburg U.M.C.)	1990	3925 Main St., Middleburg	Event, Architecture/Engineering	90000318
Middleburg Historic District	1990	3881--3895 Main St. and 2145 Wharf St., Middleburg	Event, Architecture/Engineering	90000313
Orange Park Elementary School	1998	1401 Plainfield Ave., Orange Park	Event, Architecture/Engineering	98000858
Orange Park Negro Elementary School (aka Teresa Miller School; Neigh. Svc. Ctr.)	1998	440 McIntosh Ave., Orange Park	Event, Architecture/Engineering	98000856
Princess Mound	1990	Green Cove Springs	Information Potential	90000311
River Road Historic District	1998	Jct. of River Rd. and Stiles Ave., Orange Park	Event, Architecture/Engineering	98000861
St. Margaret's Episcopal Church and Cemetery (aka Hibernia Cemetery)	1973	6874 Old Church Rd., Hibernia	Event, Architecture/Engineering	73000570
St. Mary's Church	1978	St. Johns Ave., Green Cove Springs	Event, Architecture/Engineering	78000933

Site Name	Added	Location	Historic Significance	NRIS Number
William Westcott House	1998	443 Stiles Ave., Orange Park	Event, Architecture/Engineering	98000859
Winterbourne (aka John Ferguson House)	1996	2104 Winterbourne W., Orange Park	Architecture/Engineering	96000161

Source: National Register of Historical Places – Florida, March 19, 2017

The County's land development regulations currently provides for group homes and foster homes. The County will need to continue monitoring the effectiveness of those regulations to ensure that land use compatibility is preserved, that necessary facilities and services are provided and that adequate, appropriate facilities are being developed and operated. Group homes are a type of non-institutional group quarters. These facilities, which serve adults and/or children, are usually operated by private or non-profit agencies and are licensed or registered with the Florida Department of Children and Families. Group homes provide a living environment for unrelated residents who operate as the functional equivalent of family, which includes such supervision and care as may be necessary to meet the physical, emotional and social needs of the residents. **Table 16** shows a list of licensed group home facilities in Clay County.

Table 16 – Group Home and Other Residential Facilities

Name / Address	Type	Capacity	Planning District
Queen of Angels / 1645 Bartlett Ave.	Assisted Living Facility	6	Orange Park
Kevin Drive Group Home / 512 Kevin Dr.	Group Home for Teens and Young Adults	6	Doctor's Inlet/Ridgewood
Jabot's Assisted Living, Inc. / 2031 Sussex Dr.	Assisted Living Facility	8	Doctor's Inlet/Ridgewood
Birchwood Group Home / 2840 Birchwood Dr.	Group Home	6	Doctor's Inlet/Ridgewood
Forest Oaks Group Home / 2898 Forest Oaks Dr.	Group Home	6	Doctor's Inlet/Ridgewood
Lakeside Villa Group Home / 3168 Lakeside Villa	Group Home	6	Doctor's Inlet/Ridgewood
Meadow Drive Foster Home / 1101 Meadow Dr.	Foster Home	2	Doctor's Inlet/Ridgewood
Stonebridge Group Home / 2326 Stonebridge St.	Group Home	6	Doctor's Inlet/Ridgewood
Camphorwood Group Home / 2400 Camphorwood Ct.	Group Home	6	Doctor's Inlet/Ridgewood
Absolutely Assisted Living, Inc. / 2485 Ridgecrest Ave.	Assisted Living Facility	8	Doctor's Inlet/Ridgewood
Bottomridge Group Home / 2499 Bottomridge Dr.	Group Home	6	Doctor's Inlet/Ridgewood
Tramore Place Group Home / 2595 Tramore Pl.	Group Home	6	Doctor's Inlet/Ridgewood
Pebbleridge Group Home / 2762 Pebbleridge Ct.	Group Home	6	Doctor's Inlet/Ridgewood
Secret Harbor Group Home / 2771 Secret Harbor	Group Home	6	Doctor's Inlet/Ridgewood
Quality Care of Florida, Inc. / 1261 Tumbleweed Dr.	Assisted Living Facility	6	Doctor's Inlet/Ridgewood
Quality Care of Florida, Inc. II / 228 Old Jennings Rd.	Assisted Living Facility	5	Doctor's Inlet/Ridgewood
Tuscaora Trail Home / 2959 Tuscaora Trail	Group Home	4	Doctor's Inlet/Ridgewood
Woodbridge Group Home / 1861 Woodbridge Ct.	Group Home	5	Doctor's Inlet/Ridgewood
Lakemont Group Home / 1835 Lakemont Cir.	Group Home	4	Doctor's Inlet/Ridgewood
Eclipse / 2015 Eclipse Dr.	Group Home	4	Doctor's Inlet/Ridgewood

Name / Address	Type	Capacity	Planning District
Harvest Bend Home / 421 Harvest Bend	Group Home	4	Fleming Island
Ila Marie Spratley / 705 George's Place	Adult Family Care Home	3	Fleming Island
Challenge Enterprises of North Florida / 3061 Lexi Ct.	Group Home	Unknown	Penney Farms / Lake Asbury
Middleburg Assisted Living Facility, Inc. / 4192 Clove St.	Assisted Living Facility	4	Keystone Heights
William Swartout / 4860 Chickpea St.	Adult Family Care Home	5	Keystone Heights

Source: Florida Department of Children and Families

D. Future Housing Needs

The key household characteristics required to develop an effective housing strategy are household size, household type, poverty status, and the share of income devoted to housing costs. The previous sections in this report looked at the housing stock as it existed in the year 2016. Having a good understanding of present condition is important to address what will happen to the housing stock over time. Using the previous sections as a foundation, this section forecasts anticipated housing needs based on population projections and addresses land requirements. This section contains projections that can be helpful to point out problem areas and can assist in designing goals, objectives, and policies to address the identified previous problems.

Population Forecasts

In order to determine future needs, projections of future households must be taken into consideration. Demand for housing has a direct correlation with population growth. As population increases, the demand for additional housing increases. A household is a family, group or individuals living in the same dwelling unit. Household population represents that portion of the resident population that does not live in group quarters such as dormitories, nursing homes, and boarding houses.

Population projections prepared through year 2040 by the University of Florida Bureau of Economic and Business Research ("BEBR") were reviewed as part of the data collection activities performed for the update of the County's Comprehensive Plan. In 2040, unincorporated Clay County is projected to have a population of 268,061, while the County as a whole (including the four municipalities) is projected to reach 294,100 ranking it 25th of Florida's 67 counties.

Table 17 identifies that over the course of the next planning period (2040) it is estimated that the population of unincorporated Clay County will increase by 46%. By examining data listed in **Table 18**, the largest increase in population is expected to be residents 75 years of age and older, a 165% increase in that older age group. All other age groups are expected to increase in population by 2040, with those aged 40 to 49 years having the greatest increase: 15,140 people, which is an increase of approximately 55.8% over 2020's population estimate.

Table 17 – Projected Populations

Unincorporated Clay County		2010	2015	2020	2025	2030	2035	2040
Population		173,446	183,611	203,620	222,579	238,894	254,024	268,061
Increase Over Previous		-	5.9%	10.9%	9.3%	7.3%	6.3%	5.5%
Increase Over 2015		-	-	10.9%	21.2%	30.1%	38.4%	46.0%
Planning Districts	Middleburg / Clay Hill	18,888	19,277	19,216	19,054	18,793	18,611	18,502
	Doctors Inlet / Ridgewood	73,900	81,231	87,894	94,105	94,095	98,807	104,016
	Orange Park	16,657	16,663	16,790	16,831	16,622	16,424	16,332
	Fleming Island	27,126	27,866	28,644	29,275	28,831	28,535	28,424
	Green Cove Springs	7,410	7,639	10,292	12,892	22,571	28,743	34,251
	Penney Farms / Lake Asbury	13,434	14,579	24,094	33,485	41,087	45,976	49,525
	Keystone Heights	16,031	16,357	16,690	16,936	16,894	16,929	17,009
	Total Unincorporated County	173,446	183,611	203,620	222,579	238,894	254,024	268,061

Sources: *Medium Projections of University of Florida Bureau of Economic and Business Research; Florida Population Studies, Vol. 50, Bulletin 177, April 12, 2017*
Clay County Division of Planning and Zoning, May 16, 2017

Table 18 – Projected Populations by Age

Age	2020	2025	2030	2035	2040
0 to 4 Years	12,717	13,892	14,991	16,025	16,530
5 to 9 Years	14,514	15,569	16,778	17,972	19,098
10 to 14 Years	14,858	16,540	17,558	18,772	19,980
15 to 19 Years	13,878	14,807	16,156	16,971	18,045
20 to 24 Years	12,417	12,731	13,374	14,593	15,314
25 to 29 Years	13,466	13,358	13,574	14,211	15,310
30 to 34 Years	12,342	16,130	15,802	15,865	16,474
35 to 39 Years	13,681	14,938	19,357	18,790	18,806
40 to 44 Years	13,190	15,328	16,427	21,114	20,417
45 to 49 Years	13,934	13,955	15,942	17,066	21,847
50 to 54 Years	13,857	14,197	14,049	16,012	16,942
55 to 59 Years	14,771	14,017	14,232	13,976	15,765
60 to 64 Years	12,716	14,827	13,978	14,057	13,732
65 to 69 Years	10,342	12,513	14,501	13,567	13,650
70 to 74 Years	8,500	9,727	11,601	13,327	12,458
75 or more Years	11,534	16,051	20,504	25,353	30,542
Total Unincorporated County	206,717	228,580	248,824	267,671	284,910

Sources: *Population Projections by Age, Sex, Race & Hispanic Origin for Florida and Its Counties 2010-2040*
Florida Housing Data Clearinghouse, Population Projection by Age, University of Florida Bureau of Economic and Business Research

This distribution pattern of mostly single-family dwelling units contrasting with renter-occupied multi-family dwelling units is projected to remain without drastic changes for the entire planning period through 2040 as shown in **Table 19**.

Table 19 – Projected Dwelling Units by Tenure

Type of Unit	2016 ¹	2020	2025	2030	2035	2040	Need
Owner	47,224	60,494	67,952	74,866	80,934	87,135	39,911
Renter	14,853	16,365	18,213	19,835	21,332	22,470	7,617
Total Unincorporated County	62,077	76,859	86,165	94,701	102,266	109,605	47,528

¹ Number of occupied units (see Table 2)

Source: Florida Housing Data Clearinghouse, Affordable Housing Needs Assessment, Household Demographic Data

Projected Affordable Housing Availability

This section of the analysis projects the number of households in various income ranges in order to determine the type and price of dwelling units needed for the anticipated population. These projections are based on the Affordable Housing Needs Assessment provided by the Florida Housing Data Clearinghouse.

Using the Shimberg Center's Affordable Housing Needs Assessment, a calculation can be made for a cumulative surplus/deficit of affordable occupied units in the County. This calculation takes into account the County's population projections to 2040. The U.S. Department of Housing and Urban Development estimates Clay County's Area Median Income ("AMI") for Fiscal Year 2017 as \$64,414, roughly \$500 less than last year.

Table 20 – Projected Area Median Income

2009	2010	2011	2012	2013	2014	2015	2016	2017
\$65,067	\$65,809	\$66,401	\$67,306	\$63,241	\$63,189	\$63,293	\$64,931	\$64,414

Source: U.S. Department of Housing and Urban Development, Office of Policy Development and Research

Table 21 presents the projected counts of households in selected income ranges for the County. Projections of the distribution of future households among the income ranges are further divided into owner-occupied dwelling units and renter-occupied units.

Table 21 – Projected Households by Income, Cost Burden, and Tenure

Income Category	2020		2025		2030		2035		2040	
0 to 30% AMI	6,129		6,842		7,503		8,100		8,710	
30.1 to 50% AMI	7,411		8,441		9,432		10,246		10,992	
50.1 to 80% AMI	11,773		13,360		14,853		16,109		17,235	
80.1 to 120% AMI	16,178		18,283		20,237		21,912		23,426	
More than 120% AMI	35,368		39,239		42,676		45,899		49,242	
Total Unincorporated County	76,859		86,165		94,701		102,266		109,605	
Household Income Paid for Housing	Owner	Renter	Owner	Renter	Owner	Renter	Owner	Renter	Owner	Renter
30% or less	44,411	9,285	49,876	10,331	54,964	11,223	59,432	12,057	64,094	12,656
30.1 to 50%	9,031	3,276	10,150	3,667	11,170	4,025	12,066	4,344	12,908	4,584
More than 50%	7,052	3,804	7,926	4,215	8,732	4,587	9,436	4,931	10,133	5,230
Total Unincorporated County	60,494	16,365	67,952	18,213	74,866	19,835	80,934	21,332	87,135	22,470
	76,859		86,165		94,701		102,266		109,605	

Source: Florida Housing Data Clearinghouse, Affordable Housing Needs Assessment, Household Demographic Data

Land Required for Projected Housing Needs

Clay County's population is projected to continue to grow at a relatively steady rate. The 2040 Future Land Use Map ("FLUM") accommodates enough residential development will meet the projected housing need of 109,605 dwelling units. The locations for the projected housing and the required acreages are included in the Future Land Use Element and corresponding maps in the Comprehensive Plan. In general, adequate amounts of land area are designated on the 2040 Future Land Use Map. More than enough acreage is projected to be available for all types of housing, but residential densities may have to increase in order to accommodate the projected population growth within the confines of the Development Area Boundary.

Table 22 – Projected Population and Housing

	Population	Dwelling Units
Existing (2016)	205,321	68,976
Projected (2040)	268,061	109,605
Change	+ 62,740	+ 40,629

Sources: Clay County Division of Planning and Zoning; May 16, 2017
 Florida Housing Data Clearinghouse, Affordable Housing Needs Assessment – Quick Report
 University of Florida Bureau of Economic and Business Research; Vol. 50, Bulletin 177, April 12, 2017

Summary

The population of unincorporated Clay County is projected to increase approximately 46% over the next twenty-three years, with a vast majority of the increase expected to be those aged 75 and more. The projected population increase would require approximately 41,000 additional units to accommodate the additional residents. In 2016, there were an estimated 6,789 vacant dwelling units in the unincorporated portion of the County, which is not enough to accommodate the anticipated growth.

The private sector provides the majority of the housing needed by the residents of Clay County. The County's subsidized units have been constructed through government programs in which the private sector constructs and maintains the housing development. No limitations or hindrances exist in the County with regard to availability of land or government restrictions to the housing delivery process. There are, however, some regulatory hindrances like impact fees for water/sewer connection that discourage the provision of affordable housing in the County by the private sector. The private sector is expected to deliver the projected units in the type, tenure, cost or rent and income ranges of households that are defined in the previous tables. In order to make this an achievable task, the County could provide incentives like density bonuses to encourage private developers to construct affordable dwelling units, and could continue to provide partial payment or waiver of impact fees for affordable developments holding rents or sales prices at affordable levels.

By 2040, the County's housing stock is expected to reach approximately 109,605 dwelling units, an increase of over 76%. The condition of the housing stock is very good. 34% of the County's

total housing units are less than 18 years old. Combined units lacking complete kitchen facilities or plumbing facilities comprise less than 1% of the total number of dwelling units.

According to the U.S. Census Bureau, the median rent in 2015 was \$1,034. 57% of the renters in 2015 paid less than 30% of their household income for rent. The land required to meet the projected need for housing within Clay County during the 2040 planning period is allocated on the Future Land Use Map. The FLUM provides a surplus of developable land necessary to meet the projected population and housing needs located in the unincorporated portion of the County. Development controls and availability of urban services will continue to direct growth to those areas of the County most suited to new residential development.

E. 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 commented 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 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 Housing 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 Housing 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.

As housing prices continue to rise and incomes and wages fail to keep pace, the issue of housing affordability for the residents of Clay County becomes more critical. In Home Matters, a 2015 report from the Florida Housing Coalition, the lack of affordable housing for lower income families has numerous harmful effects on residents' physical and mental health, as well as their job and educational performance. Economic development of the region is also negatively impacted when the workforce, or potential workforce, does not have access to housing.

In addition to the decreasing supply of housing that is affordable to those earning less than the Area Median Income, there is a stark geographic disparity in its availability. While many older, modest subdivisions throughout the County can provide opportunities for affordable housing, recently constructed units meeting these affordability requirements are limited and concentrated in the central portion of the County. The majority of job centers and places of employment is still located in the north while most newer housing is in the center of the County. This increases the transportation cost burden for the lower income households commuting north.

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 Housing 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 Housing Element objectives or policies that directly relate to or otherwise impact this issue.

F. Matrix for Evaluating Plan Policies

As part of the evaluation of the 2025 Comprehensive Plan's Housing Element, the County evaluated 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?

Housing	Measurable Target	Defined Terms	Achieved	Major Issue	Statute Requires	Supports Others	Observations
GOAL 1	No	No	Ongoing	No	No	No	Add HUD definition of "affordable" at end of Goal
OBJ 1.1	No	No	Yes	No	Yes	No	Funding for homeowners meeting certain income guidelines is available through the Clay County SHIP Program for rehabilitation of substandard homes. However, the SHIP program is dependent on state funding and funding levels for this program have been declining in recent years.
POLICY 1.1.1	No	No	No	No	No	No	Good policy, but incentives limited to streamlining permitting process
POLICY 1.1.2	Yes	No	Yes	No	No	No	Add frequency of LDR review (every five years)
POLICY 1.1.3	No	No	Yes	No	No	No	Several compatibility review provisions contained in LDC
POLICY 1.1.4	No	No	No	No	No	No	Add a definition of "spot zoning" to Plan
OBJ 1.2	Yes	No	No	No	No	No	Unrealistic target without having a dedicated funding source; revise with a measurable target for 2040 planning period
POLICY 1.2.1	Yes	Yes	Yes	No	No	No	
POLICY 1.2.2	No	No	Yes	Yes	No	Yes	The Board of County Commissioners adopts a CIP every year. The current CIP includes funding for road resurfacing, paving, and public safety improvements.
POLICY 1.2.3	No	No	Yes	No	No	No	Public dissemination of relocation policy information is provided through the Clay County Housing Finance Authority.
POLICY 1.2.4	No	No	Ongoing	No	No	Yes	
POLICY 1.2.5	No	No	Yes	No	No	No	LDC Sec. 3-43 is the Independent Community Overlay zone regulations.
POLICY 1.2.6	No	No	Yes	No	No	No	Ordinance No. 2016-34
OBJ 1.3	No	No	Ongoing	No	Yes	Yes	There are very few non-profit housing providers that are active in Clay County, so such partnership opportunities are limited. Additionally, there are no incentives in place for private developers to provide affordable units.
POLICY 1.3.1	No	No	Yes	No	No	Yes	GIS data of vacant land is available to identify
POLICY 1.3.2	Yes	Yes	Yes	No	No	No	
POLICY 1.3.3	No	No	Yes	No	No	Yes	County amenable to discussing
POLICY 1.3.4	No	No	Yes	No	No	Yes	Housing Finance Authority adheres to this Policy
POLICY 1.3.5	Yes	Yes	No	No	No	No	Revise to reflect additional density bonuses proposed in FLUE amendment
POLICY 1.3.6	No	Yes	Yes	No	No	Yes	Revise to reflect additional designations that allow density bonuses
POLICY 1.3.7	No	Yes	Yes	No	No	Yes	Satisfactory metrics
OBJ 1.4	No	No	Yes	No	Yes	Yes	

Housing	Measurable Target	Defined Terms	Achieved	Major Issue	Statute Requires	Supports Others	Observations
POLICY 1.4.1	No	Yes	Yes	No	No	Yes	Residential group homes that provide care for 7 to 14 individuals are allowed within the RC, RD-2, RD-3, RD-4 and PUD residential zoning districts. Residential group homes that provide care for 6 or fewer unrelated individuals are allowed within AG, AR, AR-1, AR-2, RA, RB, RC, RD-2, RD-3, RE, and PUD residential zoning districts.
POLICY 1.4.2	No	No	Yes	No	Yes	Yes	Ordinance No. 95-12, Clay County Code of Ordinances Article II, Sections 8-21 through 8-31
POLICY 1.4.3	No	Yes	Ongoing	Yes	No	Yes	Concurrency management system in place
OBJ 1.5	No	No	Yes	No	Yes	No	See Historical Element
POLICY 1.5.1	No	Yes	Ongoing	No	No	No	
POLICY 1.5.2	No	No	Yes	No	No	No	
POLICY 1.5.3	No	No	Yes	No	No	No	
POLICY 1.5.4	No	No	Ongoing	No	No	No	See Historical Element
POLICY 1.5.5	No	Yes	Yes	No	No	No	In 1994, the County passed a historic preservation ordinance that would safeguard documented buildings or sites as safe from demolition.
GOAL 2	No	No	Ongoing	No	Yes	Yes	The Clay Electric Cooperative offers rebates for ceiling insulation and the installation of high efficiency heat pumps, solar water heating systems, window film, spray foam insulation, heat pump water heaters and heat recovery units. The rebate includes conventional and manufactured homes and small commercial facilities, new and existing. Rebates are paid to Clay Electric members, not contractors.
OBJ 2.1	No	No	Ongoing	No	No	No	
POLICY 2.1.1	No	No	No	No	No	No	
POLICY 2.1.2	No	No	No	No	No	No	Add a definition of LEED to Plan
POLICY 2.1.3	No	No	Ongoing	Yes	No	Yes	Add a definition of "green roofing" to Plan
POLICY 2.1.4	No	No	Ongoing	Yes	No	No	

G. Assessment of Changes to Florida Statutes

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

2011 Legislation ("Community Planning Act")

- Establishes definition for "affordable housing" [same meaning as in Section 420.0004(3)]. Add a statutory reference for Section 163.3164(3) to Goal 1 [previously in Rule Chapter 9J-5].
- Clarifies requirements for the housing element to include guidelines, standards and strategies based on an inventory taken from the latest decennial U.S. Census or more recent estimates and various other considerations listed in repealed Rule 9J-5.010, Florida Administrative Code. [Section 163.3177(6)(f)1 and 2]. No amendment necessary.
- Deletes requirement for an affordable housing needs assessment conducted by the state land planning agency. No amendment necessary.
- Based on repealed Rule 9J-5.010, Florida Administrative Code, sets forth new requirements for the creation and preservation of affordable housing, elimination of substandard housing conditions, providing for adequate sites and distribution for a range of incomes and types, and including programs for partnering, streamlined permitting, quality of housing, neighborhood stabilization, and improving historically significant housing. No amendment necessary.

2012 Legislation

- Deletes the requirement that the housing element be based in part on an inventory taken from the latest Census [Section 163.3177(6)(f)2]. The U.S Census and Florida Housing Data Clearinghouse (based upon Census data) remain the best available data for analyzing housing conditions and inventories in Clay County. No amendment necessary.

H. Conclusions and Proposed Revisions

The Comprehensive Plan is substantively up-to-date and the County has done a good job of implementing its Comprehensive Plan. Most necessary amendments are those as required by changes in State law, or to provide greater emphasis on issues of particular importance to Clay County.

- Add the name of the Element to all GOPs to better differentiate among others in the Comprehensive Plan.
- Home prices are rising while the incomes, particularly of our workforce, are not keeping pace.
- New housing considered affordable for lower incomes and the workforce is concentrated in the central County.
- The decreasing diversity of the housing supply creates greater difficulty in meeting the needs of a broader population including younger Millennials and the aging Baby Boomers.
- The increasing desire among older adults to age in place and more young adults living with their parents, multi-generational housing (homes that have an accessory dwelling unit) will likely become a greater factor in housing choices.
- Green building, while growing quickly, is still a small percentage of total new construction projects and large-scale retrofits are needed in existing homes.
- The cost of utilities remains a challenge for lower income residents, which increases housing affordability concerns.

The following offers easy identification of six proposed changes to the Housing Element. New (added) language is underlined and removed (deleted) language is ~~struck through~~.

Proposed Amendment to HOU Goal 1

In order to achieve consistency with Florida Statutes and an accepted definition of “affordable”:

HOU Goal 1

To provide a variety of affordable housing and a suitable living environments for all current and future residents of Clay County. Affordable housing means housing costs (rent or mortgage plus utilities) does not exceed 30% of household income.

Proposed Amendment to HOU Objective 1.1

In order to establish a measurable target:

HOU Objective 1.1

Clay County shall provide appropriate land use categories and land development regulations to allow for a variety of housing types and values for the estimated 40,629 additional dwelling units needed to meet the projected rise in population by the year 2040 ~~needs of the existing and anticipated residents.~~

*Proposed Amendment to HOU Policy 1.1.2**In order to establish regularity and expectation of frequency of evaluations:***HOU Policy 1.1.2**

Every five years, the ~~The~~ County shall review and amend, as necessary, land development regulations, including subdivision regulations, zoning ordinance, building code ordinances and the like in order to identify and eliminate unnecessary requirements which may add to the cost of the housing delivery process.

*Proposed Amendment to HOU Objective 1.2**In order to establish a measurable target:***HOU Objective 1.2**

Clay County shall use data generated by the U.S. Census to identify and reduce the degree number of substandard housing units lacking complete plumbing facilities and/or complete kitchen facilities by fifty percent (50%), 255 units, by the year 2040 through conservation, rehabilitation, or demolition efforts to ten percent per year over the 2007—2025 planning period and improve the structural and aesthetic condition of existing housing.

*Proposed Amendment to the first paragraph HOU Policy 1.3.5**To accommodate the increasing need for multigenerational homes (kids living with parents after graduating college, attending to aging parents):***HOU Policy 1.3.5**

A maximum density bonus of 16 units per acre shall be allowed on no more than 100 acres within the Urban Core designation on the Future Land Use Map for the provision of housing for the elderly or handicapped and housing for very low-, low- and moderate-income households within the following future land use designations:

<u>Rural Fringe</u>	<u>7 du/ac</u>
<u>Urban Fringe</u>	<u>14 du/ac</u>
<u>Urban Core (10)</u>	<u>16 du/ac</u>
<u>Urban Core (16)</u>	<u>20 du/ac</u>

Location shall be based on need and criteria, assessing proximity to ~~the following:~~ employment, mass transit, health care, parks, commercial services, and central utility services.

*Proposed Amendment to the last paragraph of HOU Policy 1.3.6**To reflect proposed FLUE amendment offering density bonus in more than one FLU designation:***HOU Policy 1.3.6**

In order to proceed with development of increased density housing for very low-low-and moderate-income households in the Rural Fringe, Urban Fringe, Urban Core (10) and Urban Core (16) designations on portions of the Future Land Use Map, the development must achieve a minimum of 30 out of a possible 60 points available, as set forth in the Weighted Point System for Low-and Moderate-Income Housing above.

EXHIBIT B

INTRODUCTION

PURPOSE AND INTENT OF THE HOUSING ELEMENT

One of society's most basic needs is shelter. How we as a society preserve the housing stock we have and how we plan to accommodate future residents reflects upon the quality of life we enjoy or want to enjoy. It is important to consider where we locate new residential areas, for this decision will drive the determination as to where public infrastructure will be located. The Data and Analysis section provides a detailed inventory and analysis of the existing stock, assesses the needs of the community, and establishes the framework from which to address housing issues. The goals, objectives, and policies section provides County officials and the general public with the implementation strategies necessary to guide housing growth in the direction which best addresses the desires of not only Clay County's existing and anticipated residents but those with special needs as well.

The goals, objectives, and policies listed below should be followed by decision-makers involved in residential development in Clay County. These decision-makers include government officials charged with the review and approval of residential plans as well as the developers and builders who submit such plans and provide housing through the private market system. The objectives and policies are intended to serve as a guide for both public and private decisions.

Further, the objectives, policies, and strategies in this element as well as the other elements of the Comprehensive Plan should be considered and viewed as a whole. No single objective, policy, or strategy is intended to have precedence over another. Rather, they should provide an overall framework for the management of the County's resources and for meeting the needs of current and future residents.

HOU GOAL 1

To provide a variety of affordable housing and a suitable living environments for all current and future residents of Clay County. Affordable housing means housing costs (rent or mortgage plus utilities) does not exceed 30% of household income.

HOU OBJ 1.1

Clay County shall provide appropriate land use categories and land development regulations to allow for a variety of housing types and values for the estimated 40,629 additional dwelling units needed to meet the projected rise in population by the year 2040.

HOU POLICY 1.1.1

The County shall provide incentives for "in-fill" development in existing urbanized areas in order to discourage unwarranted urban sprawl.

HOU POLICY 1.1.2

Every five years, the County shall review and amend, as necessary, land development regulations, including subdivision regulations, zoning ordinance, building code ordinances and the like in order to identify and eliminate unnecessary requirements which may add to the cost of the housing delivery process.

Measure: Included in the development review procedures section of the county's unified Land Development Code are provisions for one or more of the following:

- a) A "fast-track" or "one-stop" permitting process through DRC.
- b) A maximum time limit for the review of proposals.
- c) A reduction or waiver of processing fees for affordable housing projects.
- d) Concurrent review of multiple permit applications.

HOU POLICY 1.1.3

The County shall review all proposed developments to ensure compatible buffering between single-family neighborhoods and higher density development, including commercial and industrial and multi-family development.

HOU POLICY 1.1.4

The County shall utilize locational criteria for residential, commercial, and industrial developments in the land development regulations in order to avoid problems associated with "spot zonings" and incompatibilities between future land uses.

HOU OBJ 1.2

Clay County shall use data generated by the U.S. Census to identify and reduce the number of substandard housing units lacking complete plumbing facilities and/or complete kitchen facilities by fifty percent (50%), 255 units, by the year 2040 through conservation, rehabilitation, or demolition efforts to improve the structural and aesthetic condition of existing housing.

HOU POLICY 1.2.1

The County shall develop a system to inventory substandard housing every five years, based upon securing adequate local, state, or federal funding sources through a Housing Authority or other agency. The purpose of this inventory is to identify those housing units suitable for rehabilitation and those appropriate for demolition. The inventory shall be based upon the following evaluation criteria:

- 1) Standard (to be conserved)--structure appears to provide safe and adequate shelter and has no defects or only slight defects which are normally corrected during the course of regular maintenance.
- 2) Substandard (to be rehabilitated)--structure requires more than routine or minor repairs or improvements. Typical deficiencies include foundation defects indicated by sagging or leaning, extensive rotting of eaves or porch flooring, numerous holes or cracks in walls, broken screens or windows, and similar defects which can be economically repaired relative to the overall value of the structure.
- 3) Substandard Warranting Clearance--structure appears unsafe for occupancy or dilapidated to the point that it would not be economically prudent to repair relative to its overall value and, therefore, may warrant clearance.

HOU POLICY 1.2.2

The County shall initiate through the Capital Improvement Program, neighborhood upgrading projects by prioritizing neighborhood level capital improvement projects in neighborhoods lacking such facilities as paved streets, sidewalks, and streetlights.

HOU POLICY 1.2.3

The County shall establish a local relocation assistance policy pursuant to the Federal Relocation Act (Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970). Public dissemination of relocation policy information will be provided through the Housing Finance Authority or other appropriate agency.

HOU POLICY 1.2.4

The County shall authorize and appropriate sufficient funds to establish a revolving low interest loan program for the purpose of rehabilitating sound but deteriorated housing and building new affordable housing in the County. The program shall be implemented by the Clay County Housing Finance Authority.

HOU POLICY 1.2.5

The County shall cause a separate zoning category or overlay zone to be created to address the unique character of owner-occupied, low-income housing areas that have existed as independent communities historically.

HOU POLICY 1.2.6

The County's State Housing Initiative Partnership (SHIP) shall prioritize and target funding efforts to identified substandard housing units where rehabilitation is found to be feasible. The Building Department shall target those units deemed not feasible for rehabilitation and order condemnation.

HOU OBJ 1.3

The County shall act, in coordination with the private sector, to provide for adequate and affordable housing to meet the housing needs of the County's very-low, low- and moderate-income households.

HOU POLICY 1.3.1

The County shall maintain an inventory of vacant or underutilized public lands and real property to determine which land can be deemed surplus, and make appropriate surplus land available to stimulate the development of affordable housing.

HOU POLICY 1.3.2

The County's SHIP Department shall monitor affordable projects and advise the County government with respect to procedures and regulations affecting the development of affordable housing.

HOU POLICY 1.3.3

The County shall encourage community based organizations dedicated to the provision of affordable housing for very-low and low-income households by donating publicly owned land and/or buildings identified in the public land survey, when deemed appropriate, to such organizations.

HOU POLICY 1.3.4

The Housing Finance Authority in coordination with the SHIP Department or other appropriate agency shall identify and promote local, state and federal funding sources and implementation programs to aid in the provision of affordable housing and relocation housing for lower and moderate income households and make such information available to the public, residential developers and interested organizations on an annual basis.

HOU POLICY 1.3.5

A density bonus shall be allowed for the provision of housing for the elderly or handicapped and housing for very low-, low- and moderate-income households within the following future land use designations:

Rural Fringe	7 du/ac
Urban Fringe	14 du/ac
Urban Core (10)	16 du/ac
Urban Core (16)	20 du/ac

Location shall be based on need and criteria, assessing proximity to employment, mass transit, health care, parks, commercial services, and central utility services.

All proposed developments for very low-, low- and moderate-income housing or elderly or handicapped housing shall be reviewed based on the following:

- a) Need for the type and amount of housing proposed.
- b) Mandatory provision of water and sewer services
- c) Compatibility with adjacent land uses.
- d) Evaluation using the weighted points system described below.

The low- and moderate-income categories to be served by the proposed development shall be defined using HUD standards.

HOU POLICY 1.3.6**WEIGHTED POINT SYSTEM: VERY-LOW, LOW- AND MODERATE-INCOME HOUSING**

Housing developments for very low-, low- and moderate-income occupants will be evaluated for the appropriateness of increased density based upon their proximity to the following: employment, commercial services, mass transit, parks and schools. Location relative to commercial and industrial centers will be considered an indication of proximity to employment.

- a) Proximity to commercial and industrial services and employment. Proximity shall be determined by the proposed development's location relative to boundaries drawn with one-and one and one-half-mile radii from the nearest existing (active) commercial or industrial use shown on the Future Land Use Map.

Allow a maximum of 20 points based on the distance in miles to the nearest existing commercial or industrial use. Points will be awarded as follows: 0 to 1 mile or transportation provided by development (20 points); 1.1 to 1.5 miles (10 points).

- b) Proximity to mass transit routes. Proximity shall be determined by the proposed development's location relative to boundaries drawn with one- and one and one-half-mile radii from the nearest mass transit stop.

Allow a maximum of 20 points based on the distance in miles to the nearest mass transit stop. Points will be awarded as follows: 0 to 1 mile, or transportation provided by development (20 points); 1.1 to 1.5 miles (10 points).

- c) Proximity to parks. Proximity shall be determined by the proposed development's location relative to boundaries drawn with one-half- and one-mile radii from the nearest neighborhood or community park.

Allow a maximum of 10 points based on the distance in miles to the nearest neighborhood or community park. Points will be awarded as follows: 0 to .5 mile or park provided on site (10 points); .6 to 1 mile (5 points).

- d) Location within walking distance of a public school, as indicated by a radius drawn from the nearest public school. Clay County School Board standards for walking distance will be used for the radii (1.5 miles for grades K-6; two miles for grades 7-12). Where the School Board has modified the standard due to hazardous conditions, such modifications will prevail.

Allow a maximum of 10 points based on the distance in miles to the nearest public school. Points will be awarded as follows: 0 to 1.5 miles to an elementary school or zero to two miles to a junior high or high school (10 points). No points for location outside the walking distance.

Developments for very low- and low-income occupants which also incorporate at least 25 percent of total housing units for elderly or handicapped occupants shall be evaluated based on the criteria described for the provision of elderly and handicapped housing.

In order to proceed with development of increased density housing for very low-low-and moderate-income households in the Rural Fringe, Urban Fringe, Urban Core (10) and Urban Core (16) designations on the Future Land Use Map, the development must achieve a minimum of 30 out of a possible 60 points available, as set forth in the Weighted Point System for Low-and Moderate-Income Housing above.

HOU POLICY 1.3.7

WEIGHTED POINTS SYSTEM: ELDERLY AND HANDICAPPED HOUSING

Developments which incorporate at least 25 percent of total housing units for the use of elderly and/or handicapped occupants will be evaluated for the appropriateness of increased density based upon their proximity to the following: commercial services, mass transit, parks and health care.

- a) Proximity to commercial services. Proximity shall be determined by the proposed development's location relative to boundaries drawn with one-half and one-mile radii from the nearest existing (active) commercial use shown on the Future Land Use Map.

Allow a maximum of 20 points based on the distance in miles to the nearest existing commercial use. Points will be awarded as follows: 0 to .5 mile or transportation provided by development (20 points); .6 to 1 mile (10 points).

- b) Proximity to mass transit routes. Proximity shall be determined by the proposed development's location relative to boundaries drawn with one-half- and one-mile radii from the nearest mass transit stop.

Allow a maximum of 20 points based on the distance in miles to the nearest mass transit stop. Points will be awarded as follows: 0 to .5 mile or transportation provided by development (20 points); .6 to 1 mile (10 points).

- c) Proximity to parks. Proximity shall be determined by the proposed development's location relative to boundaries drawn with one-half- and one-mile radii from the nearest neighborhood or community park.

Allow a maximum of 10 points based on the distance in miles to the nearest neighborhood or community park. Points will be awarded as follows: 0 to .5 mile or park provided on site (10 points); .6 to 1 mile (5 points).

- d) Proximity to hospital facilities. Proximity shall be determined by the proposed development's location relative to boundaries drawn with three- and six-mile radii from the nearest hospital.

Allow a maximum of 20 points based on the distance in miles to the nearest hospital. Points will be awarded as follows: 0 to 3 miles or health care facility and health care staff provided on site (20 points); 3.1 to 6 miles (10 points).

In order to proceed with development of increased-density housing for elderly and handicapped persons in the Urban Core portions of the Future Land Use Map, the development must achieve a minimum of 35 out of a possible 70 points available, as set forth in the Weighted Point System for Elderly and Handicapped above.

HOU OBJ 1.4 **The County shall provide for adequate sites and infrastructure for mobile homes, manufactured homes, group homes, foster care facilities, the elderly, handicapped and rural farm workers households in order to meet the needs of persons requiring this type of housing.**

HOU POLICY 1.4.1

The County shall provide the means for integrating group living and foster care facilities into appropriate residential areas to provide for a variety of rural and urban locations and to allow deinstitutionalization and foster non-discrimination in the land development regulations.

HOU POLICY 1.4.2

The County shall adopt and enforce a fair housing ordinance, in accordance with the Florida Fair Housing Act, Chapter 760.020, F.S., in order to provide housing opportunities to all residents desiring housing regardless of age, race, handicap, disability, sex or family size.

HOU POLICY 1.4.3

The County shall ensure that infrastructure and public facilities in the urban service area are provided for mobile and manufactured homes.

HOU OBJ 1.5 **Clay County shall actively promote the preservation of historically significant housing.**

HOU POLICY 1.5.1

The Clay County Planning Department shall coordinate with the Clay County Historical Society and Historical Commission to identify historically significant housing.

HOU POLICY 1.5.2

The County shall adopt incentives for developers to protect and preserve historically significant housing in the County. Criteria for incentives may include, but are not limited to:

- a) Granting tax abatement to developers who do not destructively modify designated historically significant housing.

HOU POLICY 1.5.3

Clay County shall implement programs, policies, and regulations which preserve and encourage the rehabilitation of historic resources.

HOU POLICY 1.5.4

Clay County shall coordinate historic resource protection activities, procedures and programs with applicable state and federal laws, policies, and guidelines.

HOU POLICY 1.5.5

Clay County shall promote the proper maintenance, restoration, preservation, rehabilitation or reconstruction appropriate to historic sites.

- a) Improvements made to historically significant housing structures shall be consistent with the Historic Preservation Ordinance.

HOU GOAL 2

Clay County shall develop standards, plans and principles to address energy efficiency in the design and construction of new housing (163.3177(6)(f), F.S.)

HOU OBJ 2.1

Clay County shall encourage to create and to maintain more energy efficient buildings.

HOU POLICY 2.1.1

Clay County shall consider incorporating energy efficiency codes (for new construction and the renovation of existing buildings) to make buildings more energy efficient.

HOU POLICY 2.1.2

Clay County shall consider requiring that all new construction and retrofit projects become LEED® certified. LEED® provides standards for energy efficient design for a variety of building types, as well as standards for existing buildings and for improving building operations without making major exterior and interior changes.

HOU POLICY 2.1.3

Clay County shall encourage installing green roofing.

HOU POLICY 2.1.4

Clay County shall encourage the use of renewable energy resources in all new construction. When feasible, orient the structure to optimize solar orientation and access prevailing breezes, minimize east-west facing windows, and maximize natural lighting.

Definitions

A **standard** dwelling unit is one that has no apparent structural defects, or may have defects of a minor nature that would require repair during the course of routine maintenance. A standard unit can range from one that is of fair quality, frequently mass produced where low cost production is a primary consideration, to homes that are designed individually and reflect top workmanship with considerable attention to detail, special design, top quality materials, and many luxury items. While some homes may exhibit an overall quality of materials and workmanship that may be below average, the buildings are not substandard and will meet minimum requirements of lending institutions, mortgage insuring agencies and building codes.

Substandard dwelling units fall into two categories for degree of severity: deteriorated and dilapidated. **Substandard deteriorated** is a dwelling unit that can be brought up to standard condition with rehabilitation. Such housing has one or more defects of an intermediate nature that can be corrected for the unit to provide safe and adequate shelter. The repairing or restoration of a dwelling unit where the value of such repair or restoration will contribute more value to the dwelling unit than the cost of the repair is a major guideline for determining the severity of the housing condition. These units may show several critical defects such as structural damage, unsafe porches or steps, major roof repair, or missing windows, but overall appears to be economically feasible for rehabilitation efforts. Specifically substandard housing has been described as a dwelling unit which has one or more of the following characteristics: (1) lacks complete plumbing facilities; (2) lacks any heating facilities; and/or (3) has sufficient structural damage that it does not meet minimum Florida Building Code requirements.

Substandard dilapidated is a dwelling unit which appears to be considerably past the point of rehabilitation. The unit may lack complete plumbing or sanitary facilities for the exclusive use of the occupants; may be in violation of one or more major sections of an applicable building code where such violation poses a serious threat to the health of the occupant and dangerous to human life and the majority are considered beyond repair and should be demolished.

Community residential homes are a specific group of residential facilities covered under Chapter 419, Florida Statutes. Community residential home means a dwelling unit licensed to serve residents who are clients of the Department of Elderly Affairs, the Agency for Persons with Disabilities, the Department of Juvenile Justice, or the Department of Children and Families or licensed by the Agency for Health Care Administration which provides a living environment for seven to fourteen unrelated residents who operate as the functional equivalent of a family, including such supervision and care by supportive staff as may be necessary to meet the physical, emotional, and social needs of the residents.

Group home is a category of community residential homes. By Florida Statute, homes of six or fewer residents which otherwise meet the definition of a community residential home shall be allowed in single-family or multi-family zoning districts without approval by the local government, provided that such homes shall not be located within a radius of 1,000 feet of another existing such home with six or fewer residents.

Green roofing is a roof of a building that is partially or completely covered with vegetation and a growing medium, planted over a waterproofing membrane. It may also include additional layers such as a root barrier and drainage and irrigation systems.

Historic site is defined by Chapter 267, Florida Statutes as a structure or place of outstanding historical and cultural significance and designated as such, by state or federal government. A local historic resource can be any historic site, building, object, or other real or personal property of historical, architectural, or archaeological value, as it related to the history, government, and culture of the State of Florida.

Infill is the development of new housing or other buildings on scattered vacant sites that are dispersed throughout built-up areas.

LEED means Leadership in Energy and Environmental Design, one of the most popular green building certification programs used worldwide. LEED-certified buildings are resource efficient, use less water and energy, and reduce greenhouse gas emissions.

Manufactured home means a mobile home fabricated on or after June 15, 1976, in an offsite manufacturing facility for installation or assembly at the building site, with each section bearing a seal certifying that it is built in compliance with the federal Manufactured Home Construction and Safety Standard Act (Chapter 320.01(2)(b), Florida Statutes). For the purpose of the Housing Element, mobile homes built after the 1976 Act and manufactured homes are synonymous. Mobile/manufactured homes do not meet the requirements of Chapter 553, Florida Statutes, so are ineligible for State Housing Initiatives Partnership Program funding.

Mobile home is defined by Chapter 320.01(2)(a), Florida Statutes, as a structure, transportable in one or more sections, which is eight body feet or more in width and which is built on an internal chassis and designed to be used as a dwelling when connected to the required utilities and includes the plumbing, heating, air conditioning, and electrical systems contained therein.

Modular home or manufactured building means a closed structure, building assembly, or system of subassemblies, which may include structural, electrical, plumbing, heating, ventilating, or other service systems manufactured with or without other specified components, as a finished building or as part of a finished building. This part does not apply to mobile homes. Manufactured buildings may also mean, at the option of the manufacturer, any building of open construction made or assembled in manufacturing facilities away from the building site for installation or assembly and installation on the building site. SHIP funds may be used to purchase a residential manufactured building (modular home) if the home bears the Department of Economic Opportunity insignia seal signifying that the homebuilding complies with the codes mandated in Florida Statutes.

Multi-family unit is a building designed for and occupied by more than one family, with cooking facilities for the exclusive use of each family.

Rehabilitation is the act or process of returning a property to a state of utility through repair or alteration to correct major structures and safety deficiencies which makes possible an efficient contemporary use while preserving those portions or features of the property which are significant to its historical, architectural and cultural value. The SHIP Rule (9I-37.002(35), Florida Administrative Code) defines rehabilitation as "...repairs or improvements which are needed for safe and sanitary habitation, correction of substantial code violations, or the creation of additional living space".

Spot zoning is the granting to a particular parcel of land a classification concerning its use that differs from the classification of other land in the immediate area.

CONSERVATION ELEMENT SUPPORT DOCUMENT

Data, Inventory & Analysis

Clay County 2040 Comprehensive Plan

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A. Introduction

Purpose

The Conservation Element inventories the natural resources of Clay County considering the increasing requirements placed on these support systems to meet the demands created by an increasing population. Public workshops and state agency comments for the 2017 Evaluation and Appraisal Report (EAR), as well as revised state and federal conservation regulations have further guided the analysis presented here for the 2040 plan EAR-based amendments.

Standards

Chapter 163 of the Florida Statutes (F.S.) provides the statutory authority for the preparation, review, and determination of compliance for local government comprehensive plans. Significant changes to these state requirements have been adopted since the initial comprehensive planning process became a requirement for local governments in 1985, notably for water supply planning. The Conservation Element is a required element of the comprehensive planning process.

B. Data and Analysis

The Conservation Element data and analysis is based on reviewing the “natural resources” and identifying methods of conservation, use, and protection of these natural resources. Per Chapter 163 (163.3177(6)(d)1 and 2 specifically identifies the following natural resources for analysis if they are present in the local government’s boundaries.

- Air Quality
- Water Resources
 - Rivers, bays, lakes, wetlands including estuarine marshes, groundwater, and springs, including information on quality of the resource available.
 - Floodplains.
- Known sources of commercially valuable minerals.
- Areas known to have experienced soil erosion problems.
- Areas that are the location of recreationally and commercially important fish or shellfish, wildlife, marine habitats, and vegetative communities, including forests, indicating known dominant species present and species listed by federal, state, or local government agencies as endangered, threatened, or species of special concern.

Air Quality

Air Quality is reported with the air quality index (AQI) that is calculated by the Environmental Protection Agency (EPA). Metropolitan Statistical Areas (MSAs) with a population of more than 350,000 are required to report the AQI daily to the general public. Clay County is part of the Jacksonville MSA, yet does not any federal, state, or local air quality monitoring stations are operating in Clay County.

The nearest monitoring stations for nitrogen dioxide, carbon monoxide, ground level ozone, and particulate matter are in Duval County which is designated as an Air Quality Maintenance Area for any of the criteria pollutants per 62-204.340 F.A.C. Clay County is not designated as an Air Quality Maintenance Area for any of the criteria pollutants (62-204.340 F.A.C.).

Water Resources

Rivers/Streams

Stream flow is that part of surface water which occurs in natural channels. In general, it is closely related to precipitation, groundwater, and other occurrences of surface water, such as lakes and canals. About 12 inches of the annual rainfall in Clay County leaves the area as stream flow. The remainder leaves as evaporation, transpiration by plants, or groundwater outflow. The average stream flow from Clay County into the St. Johns River is about 342 MGD, mostly from Black Creek.

The St. Johns River flows northward along the east boundary of the County. Its entire reach along the County is tidally affected and the stage of the river rises and falls with each change of the tide. Black Creek drains 488 square miles, all in Clay County except for 56.6 square miles. The South Fork Black Creek originates in Stevens Lake, which is about four miles south of Kingsley Lake. Its major tributaries are Ates Creek and Greens Creek from the south, and Bull Creek which drains the central part of the County. North Fork Black Creek originates in Kingsley Lake. Its principal tributary is Yellow Water Creek, which drains 10.5 square miles in north central Clay County and 56.6 square miles in southern Duval County. North and South Forks join at Middleburg to form Black Creek, which flows eastward to the St. Johns River.

The headwater of Etonia Creek and its tributaries from the north drain about 90 square miles of southern Clay County. The upper 150 square miles of the basin in southwest Clay County and northwest Putnam County contain approximately 100 lakes, many of which have no surface outlets. Runoff from the upper part of the basin is extremely low, primarily because of seepage into groundwater and evapotranspiration from the lakes and creeks. Floods in the upper part of the basin occur periodically during heavy rains.

Table 1 – Named Streams in Clay County

Name of River/Stream	Flows Into	Name of River/Stream	Flows Into
Alligator Creek	Lake Brooklyn	Little Black Creek	Black Creek
Ates Creek	S. Fork Black Creek	Long Branch	N. Fork Black Creek
Big Branch, Tributary of N Fork Black Creek	N. Fork Black Creek	Lucy Branch	Doctors Lake
Big Branch, Tributary of Yellow Water Creek	Yellow Water Creek	Mainard Branch	Doctors Lake
Black Creek	St. Johns River	Mill Branch, Tributary of N Fork Black Creek	N. Fork Black Creek
Boggy Branch	N. Fork Black Creek	Mill Branch, Tributary of Yellow Water Creek	Yellow Water Creek
Bradley Creek	Black Creek	Mill Creek	Bull Creek
Bull Creek	S. Fork Black Creek	Mill Log Creek	Black Creek
Camp Branch	Long Branch	Mint Creek	N. Fork Black Creek
Clarkes Creek	St. Johns River	North Fork Black Creek	Black Creek
Clay Branch	St. Johns River	North Prong Double Branch	Double Branch
Devils Den Creek	Ates Creek	Ortega River	St. Johns River
Dillaberry Branch	N. Fork Black Creek	Pecks Branch	Black Creek
Double Branch	Little Black Creek	Peters Branch	St. Johns River
Duck Creek	Doctors Lake	Peters Creek	Black Creek
Duckwater Branch	N. Fork Black Creek	Polander Branch	S. Fork Black Creek
Gold Head Branch	Little Lake Johnson	Red Bay Creek	St. Johns River
Governors Creek	St. Johns River	Rice Creek	St. Johns River
Greens Creek	S. Fork Black Creek	Simms Creek	Rice Creek
Grog Branch	Black Creek	South Fork Black Creek	Black Creek
Gum Branch	N. Fork Black Creek	South Prong Double Branch	Double Branch
Indigo Branch	Doctors Lake	Swimming Pen Creek	Doctors Lake
John Boy Creek	Black Creek	Wheeler Branch	N. Fork Black Creek
Johnson Slough	St. Johns River	Yellow Water Creek	N. Fork Black Creek

Sources: United States Geological Survey, Federal Emergency Management Agency, St. Johns River Water Management District

Lakes

There are 51 named natural and man-made lakes in excess of one acre which lie wholly or predominantly within Clay County (Table 2, Lake Names in Clay County). Ranging in size from

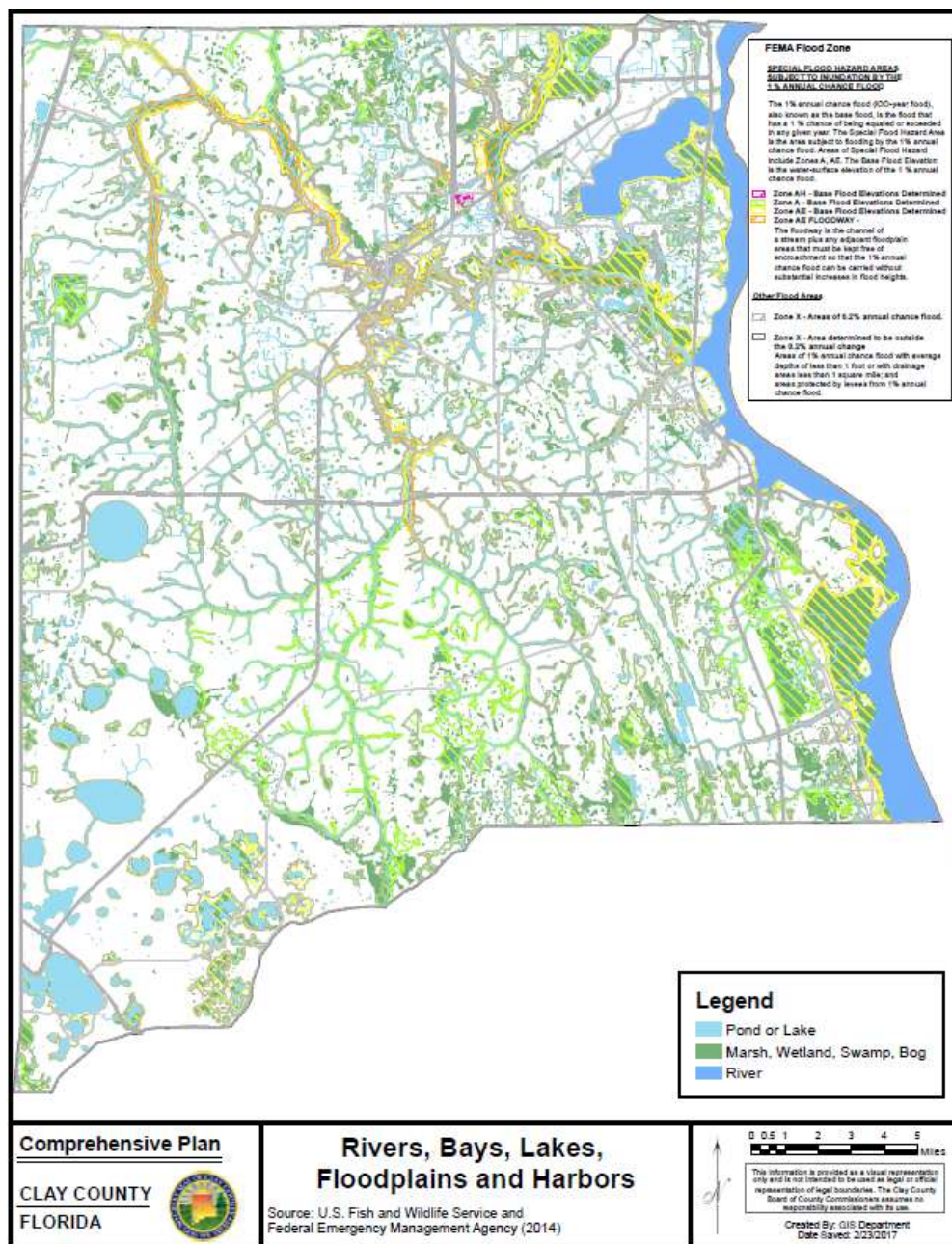
2-acre Deer Lake in Gold Head Branch State Park to Doctors Lake of over 3,000 acres, these lakes encompass an aggregate area of about 12,000 acres. Kingsley Lake is one of Florida's oldest and highest natural lakes.

Table 2 - Lake Names in Clay County

Name of Lake	Acres	Name of Lake	Acres
Big Lake Johnson	110	Long Lake	21
Blue Pond	200	Lost Pond	12
Bull Pond	4	Lowry Lake	1,246
Bundy Lake	27	M Lake	16
Crystal Lake	406	Magnolia Lake	203
Deer Springs Lake	30	Mosquito Lake	2
Devils Wash Basin (Deer Lake)	2	North Lake Asbury	112
Doctors Lake	3,433	Oldfield Pond	73
Echo Lake	15	Paradise Lake	44
Gator Bone Lake	112	Pear Lake	2
Hall Lake	187	Pebble Lake	4
Keystone Lake	19	Perch Pond	19
Kingsley Lake	1,615	Saddlebag Pond	3
Lake Bedford	210	Sheelar Lake	15
Lake Brooklyn	644	Silver Sand Lake	29
Lake Geneva	1,785	Smith Lake	245
Lake Hutchinson	103	South Lake Asbury	61
Lake Lark	6	Spencer Lake	5
Lake Lily	110	Spring Lake	100
Lake Margie	22	Stevens Lake	221
Lake Opal	20	Twin Lakes	38
Lake Ryan	6	Varnes Lake	298
Lake Washington	34	White Sands Lake	234
Little Lake Geneva	37	Whitmore Lake	138
Little Lake Johnson	29	Winding Tree Lake	44
Loch Lommond	7		

Source: St. Johns River Water Management District; FDEP GIS Database; USGS GIS

Figure 1 - Rivers, Bays, Lakes, Floodplains and Harbors



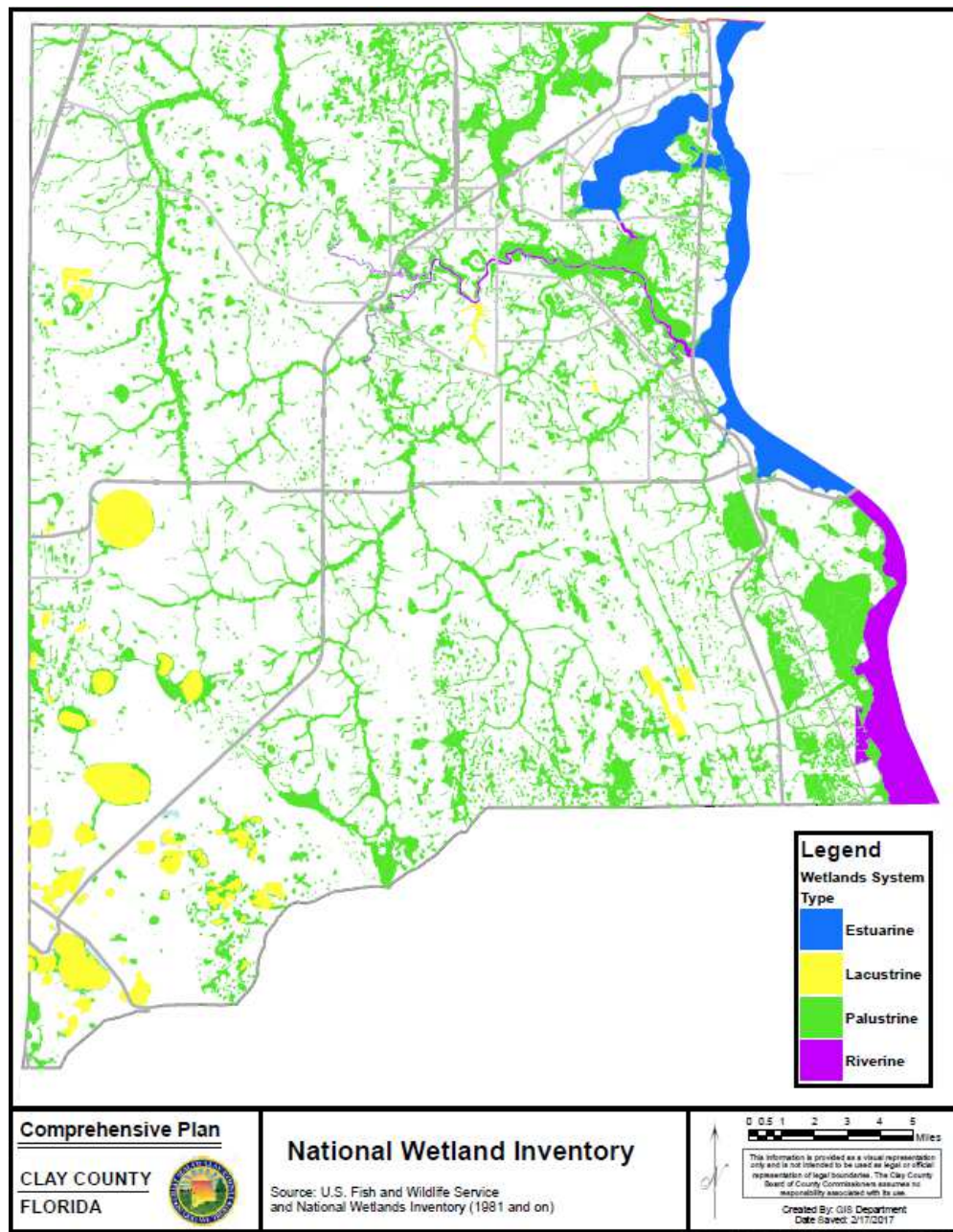
Wetlands (including estuarine marshes)

The Wetlands Map shows those areas identified as wetlands or deep water in the National Wetlands Inventory dataset by the US Fish and Wildlife Service. Doctors Lake and the St. Johns River upstream to the Shands Bridge on SR 16 are classified as estuarine systems: tidal systems partially enclosed by land with at least occasional connection to the open ocean with the ocean water being diluted by freshwater runoff. Lacustrine systems are typically lakes: those non-flowing wetlands and deep-water habitats over 20 acres with less than 30% coverage of rooted vegetation (trees, shrubs, persistent emergent herbaceous plants, etc.). Ocean-derived salinity is less than 0.5%. Lacustrine systems in Clay County include Lake Asbury, Kingsley Lake, numerous lakes on Camp Blanding and the Keystone Heights area, and some larger mine tailing ponds.

Riverine systems are freshwater flowing systems contained within a channel: creeks, streams, rivers lacking woody or persistent emergent herbaceous vegetation. Riverine systems in Clay County include the St. Johns River upstream of SR 16, and Black Creek. Palustrine wetlands are those vegetated wetlands dominated by trees, shrubs, persistent emergent herbaceous vegetation, emergent mosses or lichens with salinity from ocean derived salts < 0.5%: swamps, marshes, bogs, and prairies. They also include ponds of less than 20 acres with deepest water less than 6 feet at low water. Many stream and lake shorelines are bordered by palustrine wetlands. This is the predominant wetland type in Clay County.

Potential impacts to wetlands are regulated by the US Army Corps of Engineers, the Florida DEP, and the regional water management districts. Clay County requires that wetlands be delineated on all plats and site plans submitted for development review and that other agency permits for any impacts be secured prior to clearing and grading the site. Wetlands under state jurisdiction are designated as Conservation in the Future Land Use Element and subject to the all policies of that Element governing this land use category as well as the requirements of the Conservation Overlay Zone of the Clay County Zoning Code.

Figure 2 - National Wetland Inventory



Springs

Springs are not a common feature in Clay County. St. Johns River Water Management District has documented seven springs and seeps in the County, (Springs and Sinkholes map), all of them discharging less than 10 cubic feet per second. Green Cove Springs a third magnitude spring and the largest spring in the County, is now the County's only spring of commercial and recreational significance. It supplies the City of Green Cove Springs' swimming pool at Spring Park.

Floodplains

The Clay County Floodplain Ordinance #87-45 and subsequent amendments of Ordinances 92-4, 93-38, 2002-44, and 2004-65 regulate land uses within the special flood hazard areas located in the County. This ordinance prohibits encroachments in floodways, including fill, new construction, substantial improvements, and other developments unless certification by a registered professional engineer is provided demonstrating that such encroachments will not result in any increase in flood levels during occurrence of the base flood discharge (Clay County Ordinance #87-45 (6)(3)(a)). Elevation of buildings, machinery and equipment which serve them, and utility service connections such as faucets, circuit boxes, and electric switches and outlets, is required in the flood fringe or special flood hazard areas without a designated floodway, as is the use of flood-resistant materials for enclosed areas below the base flood elevation. Design and anchoring of buildings, manufactured homes, machinery and equipment, and utility service systems is required such that they will be capable of withstanding hydrostatic and hydrodynamic forces and the effects of buoyancy. Utility systems must be located or designed to prevent the entry of floodwaters or damage from flooding and to prevent the contamination of floodwaters by the contents of such systems.

The NFIP requirements of 44 CFR part 60 require that local governments require copies of all other local, state, and federal permits, such as but not limited to permits for wetlands and listed species impacts, are provided for a development project before issuing a floodplain development permit. The County should review coordination policies to ensure efficient compliance with this requirement.

Water Supply

Existing and proposed permitted water wells are subject to the Consumptive Use Permitting program of the St. Johns River Water Management District. This database includes 1,359 wells, of which 284 are active, 978 are inactive, 92 have never been active, 5 have unknown records. Some of these wells are for purposes other than potable water and are not included in the inventories from agencies responsible for regulating drinking water quality. As of July 2017, Clay County Health Department records included 47 active Limited Use commercial potable water wells and 152 Limited Use registered potable water wells under Health Department jurisdiction. An accurate inventory of domestic self-supply wells and small non-potable water wells is not currently available. Cones of influence have not been specifically indicated around wells in Clay County according to the St. Johns River Water Management District.

Groundwater Quality

Rule 62-520 FAC defines ground water classes and sets ground water quality standards. The classes are as follows:

F-I - Potable water use, ground water in a single source aquifer described in Rule 62-520.460, F.A.C., which has a total dissolved solids content of less than 3,000 mg/l and was specifically reclassified as Class F-I by the Commission.

- G-I – Potable water use, ground water in single source aquifers that has a total dissolved solids content of less than 3,000 mg/l.
- G-II – Potable water use, ground water in aquifers that has a total dissolved solids content of less than 10,000 mg/l unless otherwise classified by the Commission
- G-III – Non-potable water use, ground water in unconfined aquifers that has total dissolved solids content of 10,000 mg/l or greater, or which has total dissolved solids of 3,000-10,000 mg/l and either has been reclassified by the Commission as having no reasonable potential as a future source of drinking water, or has been designated by the Department as an exempted aquifer pursuant to subsection 62-528.300(3) FAC.
- G-IV – Non-potable water use, ground water in confined aquifers that has a total dissolved solids content of 10,000 mg/l or greater.

DEP identified and delineated known areas of groundwater contamination as required in rule 62-524 FAC. No areas of contamination have been delineated in Clay County pursuant to this rule. Rule 62-521 F.A.C sets wellhead protection requirements and prohibits certain activities and facilities that pose particular threats of groundwater contamination within a specified distance of public supply potable water wells.

Public water systems are required to monitor for various contaminants and varying frequencies specified by state and federal regulations. This is dependent on the type of system and population. All systems monitor for bacteriological contaminants, both at the wells and within the distribution system.

Community water systems monitor for Primary Inorganics (annual for nitrate and nitrite), Secondary Contaminants, Volatile Organic Contaminants (VOCs), Synthetic Organic Contaminants (SOCs), Radionuclides (Rads) in the water leaving the plant. Monitoring specific to the distribution system including asbestos (if present), disinfection byproducts (DBPs), and Lead and Copper Tap Sampling.

Non-Transient Non-Community water systems monitor for Primary Inorganics (annual for nitrate and nitrite), Volatile Organic Contaminants (VOCs), Synthetic Organic Contaminants (SOCs), Radionuclides (Rads) in the water leaving the plant. Monitoring specific to the distribution system including asbestos (if present), disinfection byproducts (DBPs), and Lead and Copper Tap Sampling.

Transient Non-Community (aka noncommunity) are required to sample nitrate and nitrite annually only.

Monitoring for any contaminant would be increased should they exceed the required standards. Clay County has a total of 82 Public Water systems that are monitored by FDEP for potential sources of contamination. Table 3 shows how these water systems are categorized.

Table 3 - Public Water Systems in Clay County

Type of Public Water System	Number in County
Community	15
Non-transient Non-community	11
Non-community	56

Source: FDEP NE District

Existing Recreational or Conservation Uses

Clay County has many of the natural resources reference in Chapter 163.3177(6)(d)1. The existing recreational and conversation uses of the natural resources in Clay County are well documented on the County website through maps and other Comprehensive Plan elements.

Known Pollution Problems

No known pollution problems exist beyond those that are represented as “potential” pollution points in the public water systems.

Potential

For each of the natural resources present in the County, the potential use for additional conservation, recreation, use, and/or protection has been analyzed. There is no specific direction from the County for these items. The Comprehensive Plan and land development regulations promote the development of these items for nature resources in the County. In some instances, the natural resources within the County are abundant which presents a tremendous amount of potential for either conservation, recreation, use, or protection.

Water Conservation

Clay County Utility Authority (CCUA), the main potable water utility in the County, has developed a progressive water conservation plan through the distribution of reclaimed water from wastewater treatment plants primarily for landscape and golf course irrigation. In October 2010, the Board of Supervisors adopted a proposed rate structure change to incorporate a tiered conservation rate structure. Multiple inclining volume charges are intended to encourage water conservation. The idea is simple; the more you use, the more you pay. The new rate structure has four tiers. The first tier has the lowest rate, and provides a reasonable amount for water for essential use. As the amount of water used increases to the highest category, the volume charge increases significantly. County-wide water use data compiled by the St. Johns River Water Management District for 2015, shown below in Table 4, indicate that reuse accounted for 15% of all water used in the County. The reuse percentage used has increased since 2008 while the all other categories have declined except Domestic Self-Supply, which has seen an increase over the same period. Overall, the total water use levels have decreased by 19% since 2008.

Table 4 - 2015 Water Use Data in Clay County

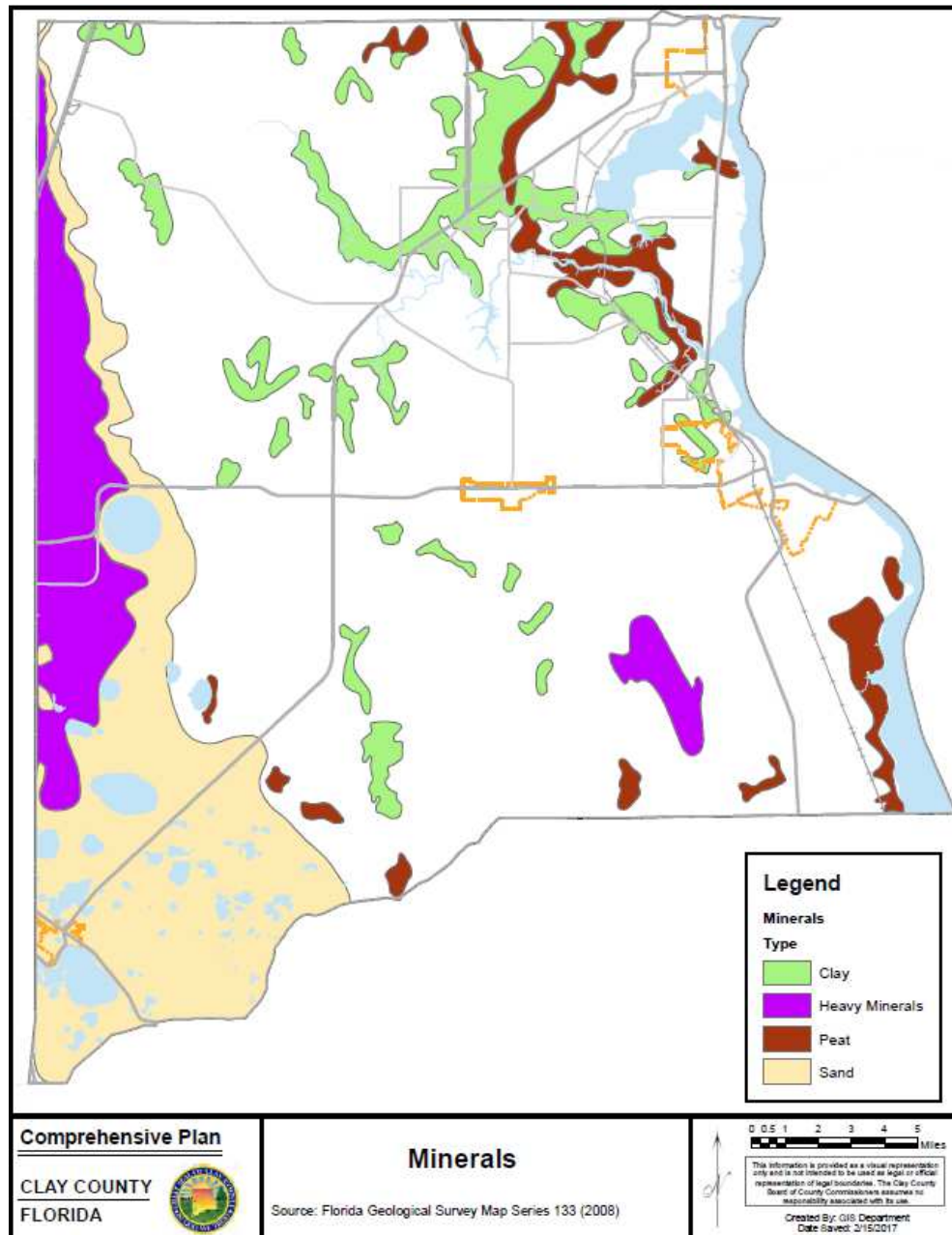
Water Use Category	Average Amount Used (million gallons per day)
Public Supply	13.51
Domestic Self-Supply	6.86
Commercial/Industrial/Institutional	0.38
Agricultural Self-Supply	1.17
Landscape/Recreational/Aesthetic Self-Supply	0.62
Reuse	4.04
Total	26.58

Source: St. Johns River Water Management District, 2015, Technical Fact Sheet SJ2007-FS1: 2015 Annual Water Use Data

Known Sources of Commercially Valuable Minerals

Per the County's Mineral Map, there are a few pockets of "heavy minerals" in the west and then some on the southeast portion of the County. The data source for this information is the Florida Geological Survey and the map does not indicate what these minerals are of if they are commercially valuable. With no further data, the conclusion was made that there are no none sources of commercial valuable minerals in the County.

Figure 3 - Minerals



Soils

All soils information and related maps included in this plan are produced from data published by the USDA Natural Resources Conservation Service (NRCS). Soil types as classified and mapped by the Natural Resources Conservation Service. Each type of soil has also been mapped based on the drainage characteristic nature of each soil as can be seen on the Soils Drainage Map.

Figure 4 - General Soils

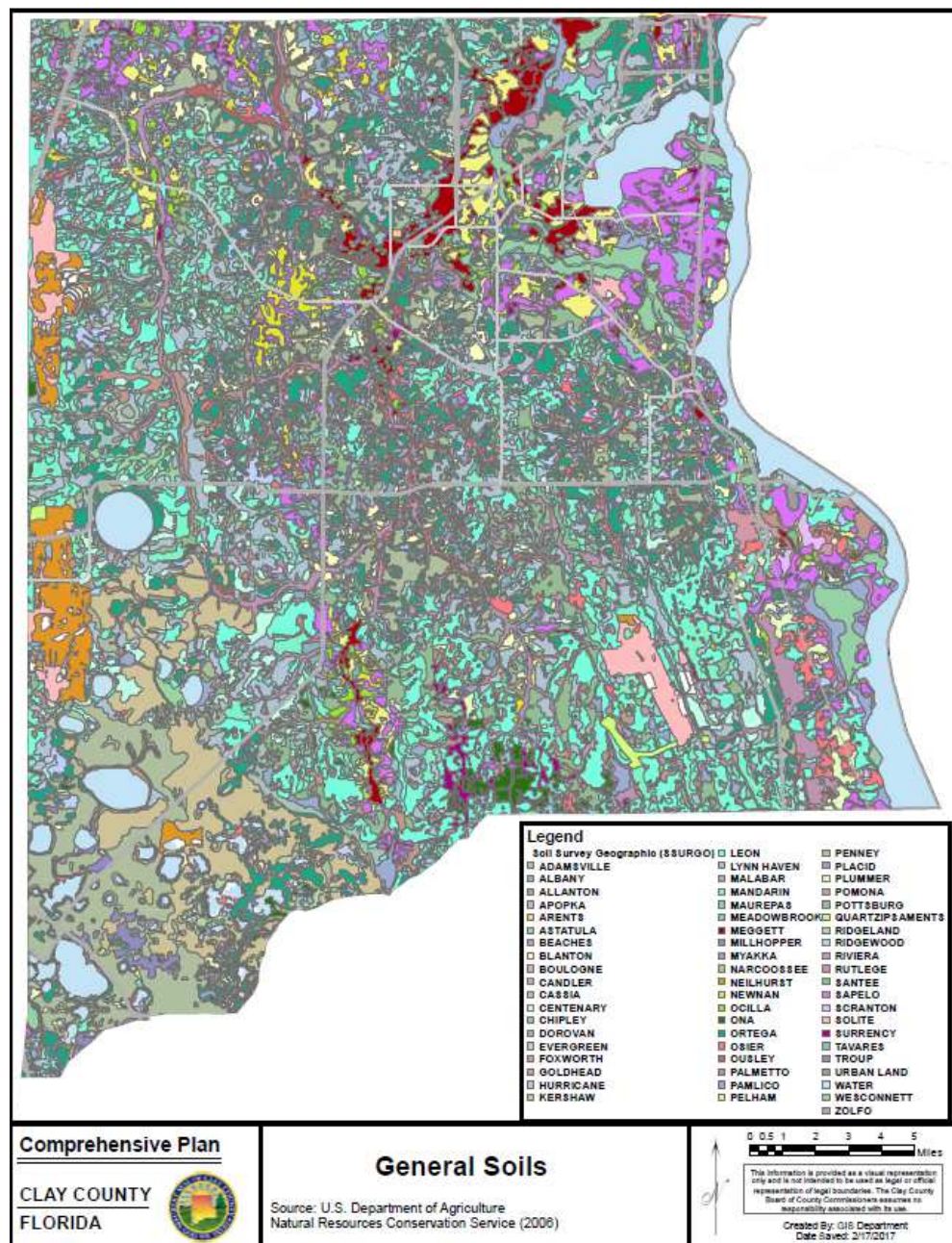
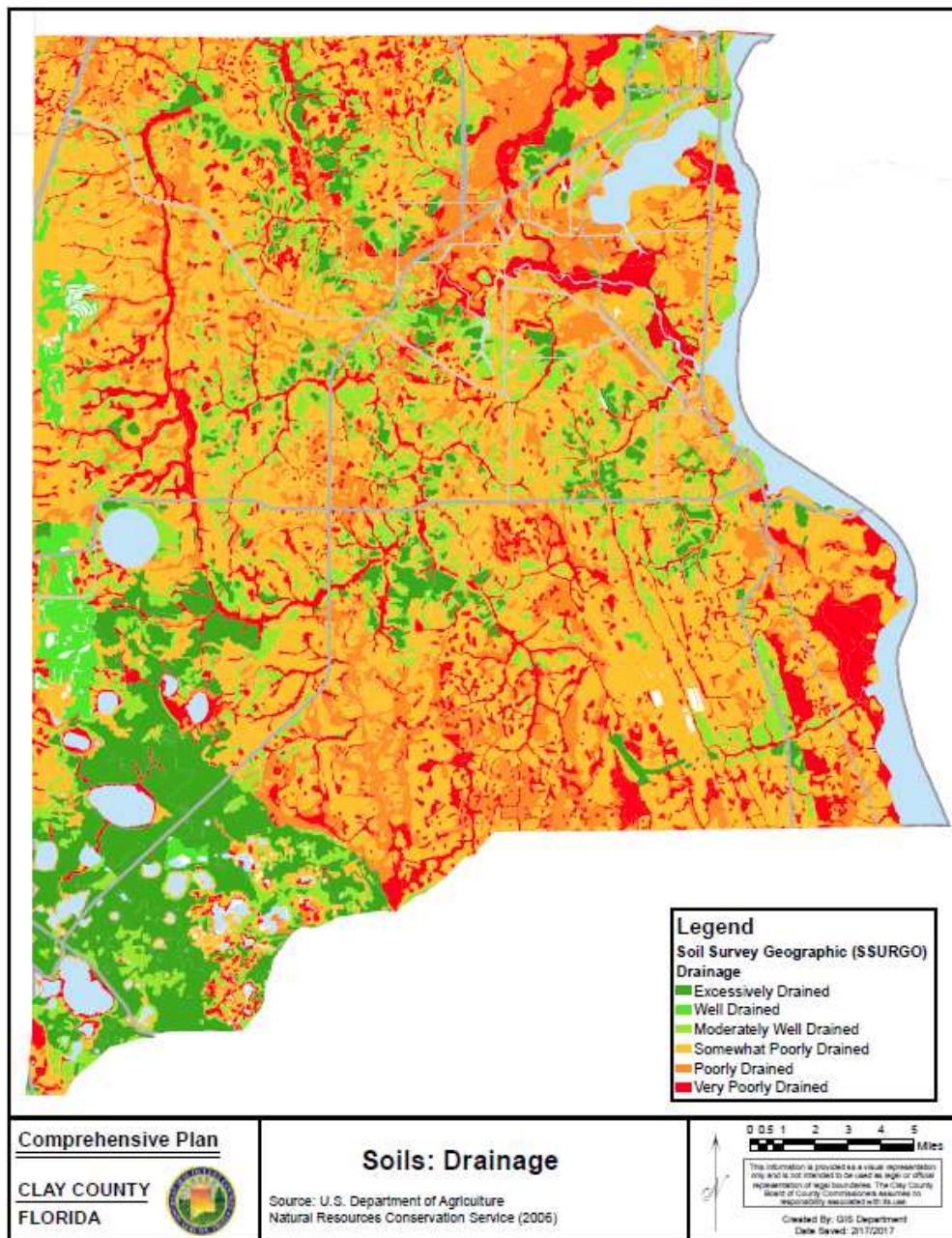


Figure 5 - Soils: Drainage



Recreation and Commercially Important Areas

Clay County has an abundant of locations that are important for recreational interest regarding wildlife, fish, and vegetative communities. Some commercial importance can be applied to the same. Recreational uses of these natural resources are present daily in Clay County. Most all water bodies provide plenty of opportunity for recreational fishing and to a lesser extent commercial opportunities. The vegetative communities throughout the County support a copious amount of wildlife that allow for recreational hunting. With that said, the vegetative communities in the County also support many endangered or threatened species.

A comprehensive inventory of wildlife and fish species currently occurring in Clay County is not available. The Florida Natural Areas Inventory (maintains records submitted from public conservation land managers. The Florida Fish and Wildlife Conservation Commission maintains records of threatened and endangered species:

<http://myfwc.com/media/1515251/threatened-endangered-species.pdf>

Species included in records from these sources are shown in Table 5.

Table 5 - Protected Wildlife Species Documented in Clay County

Mammals			
Trichechus manatus (latirostris)	West Indian manatee (Florida manatee)	E	E
Sciurus niger shermani	Sherman's fox squirrel	SSC	
Podomys floridanus	Florida mouse	SSC	
Birds			
Mycteria americana	wood stork	E	E
Falco sparverius paulus	Southeastern American kestrel	T	
Apelocoma coerulescens	Florida scrub jay	T	T
Egretta caerulea	little blue heron	SSC	
Eudocimus albus	white ibis	SSC	
Egretta thula	snowy egret	SSC	
Egretta tricolor	tricolored heron	SSC	
Aramus guarauna	limpkin	SSC	
Picoides borealis	red-cockaded woodpecker	FE	E
Reptiles			
Drymarchon corais couperi	Eastern indigo snake	T	T
Gopherus polyphemus	gopher tortoise	T	
Alligator mississippiensis	American alligator	SAT	
Pituophis melanoleucus mugitus	Florida pine snake	ST	
Fish			
Acipenser brevirostrum	shortnose sturgeon	FE	E
Acipenser oxyrinchus	Atlantic sturgeon	FE	E
Invertebrates			
Procambarus pictus	Black Creek crayfish	T	

Sources: Florida Natural Areas Inventory, 2017 (<http://www.fnai.org>)

Wildlife Protection Regulations

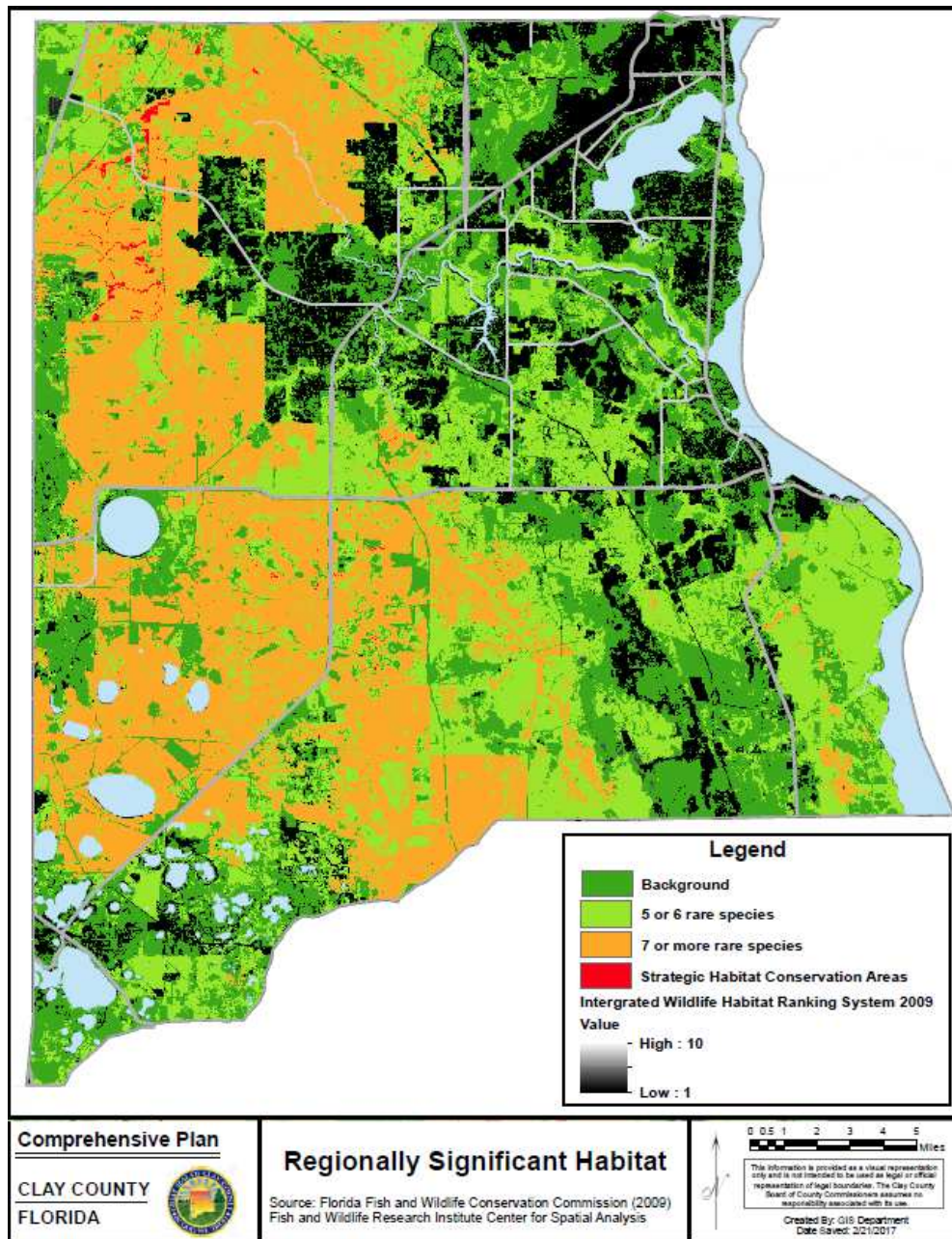
Several federal laws protect wildlife and plants. These include:

- Endangered Species Act of 1973 (16 USC 1531-1544, 50 CFR 17) which lists and protects certain species of plants and animals as endangered or threatened, and prohibits take and trade without a permit, requires Federal agencies to avoid jeopardizing their survival, and requires species recovery efforts;
- Migratory Bird Treaty Act which protects migratory birds as an international resource (16 USC 703-712, implemented by 50 CFR 210);
- Lacey Act (16 U.S.C. 3371-3378) which protects resident species by prohibiting importing, exporting, selling, acquiring, or purchasing fish, wildlife, or plants taken, possessed, transported or sold in violation of U.S. law, Indian law, State law, or foreign law;
- Marine Mammal Protection Act of 1972 (16 USC 1361, 50 CFR 216) which protects all marine mammals including the manatee; and
- Bald and Golden Eagle Protection Act (16 USC 688-668d, 50 CFR 22) which prohibits the taking (defined to include pursuit, trapping, killing, shooting or shooting at, poisoning, molesting, and disturbing), possession, and trade of bald and golden eagles without a permit.

At the state level, species are protected by the Florida Endangered and Threatened Species Act (ss. 379.2291 F.S., 68A-27 F.A.C.), the Marine Turtle Protection Act (s. 379.2431(1) F.S., 68E-1 F.A.C.), the Florida Manatee Sanctuary Act (ss. 379.2431(2) F.S., 68C-22 F.A.C.), and ss. 379.2432 F.S.

While the bald eagle has been removed from the Federal Threatened and Endangered Species list and the Florida Threatened and Endangered Species list, it is still protected under the Federal Bald and Golden Eagle Protection Act which prohibits taking eagles or nests. Take under this Act is defined to include pursuit, molesting or disturbing eagles. New National Bald Eagle Management Guidelines and Bald Eagle Monitoring Guidelines for Florida have been developed at the federal level. Florida FWC adopted the state Bald Eagle Management Plan in April 2008 to ensure the sustained recovery of this species following delisting, as required under the Florida Endangered and Threatened Species Act. Continued protection of nesting habitats is required under both the federal and state plans.

Figure 6 - Regionally Significant Habitat



Vegetative Communities (e.g. forests)

Natural vegetative communities make up a large majority of the land mass in the County. This includes commercial pine plantations as well as native pine flatwoods. Developed and/or disturbed areas made up the remainder of the County's land surface. Open water accounts for approximately six percent of the County. Disturbed areas include agriculture; mined areas; and developed areas which include commercial, industrial, and residential areas as well as transportation and utility corridors. Golf courses and other developed parks are also included in disturbed areas. The importance of the vegetative communities in Clay County cannot be understated. The table below lists the protected plant species in the County that has been documented through the Florida Natural Area Inventory (FNAI) program.

Table 6 - Protected Plant Species Documented in Clay County

Scientific Name	Common Name	State Status	Federal Status
<i>Andropogon arctatus</i>	Pinewoods bluestem	T	
<i>Asclepias curtissii</i>	Curtiss' milkweed	E	
<i>Asclepias viridula</i>	Southern milkweed; green milkweed	T	
<i>Athyrium filix-femina</i> subsp. <i>Asplenioides</i>	Southern lady fern	T	
<i>Balduina atropurpurea</i>	Purpldisk honeycombhead; purple balduina	E	
<i>Baptisia calycosa</i>	Florida wild indigo	E	
<i>Calydorea caelestina</i>	Bartram's ixia	E	
<i>Carex chapmannii</i>	Chapman's sedge	T	
<i>Centrosema arenicola</i>	Pineland butterfly pea; sand butterfly pea	E	
<i>Cleistesiosis divaricata</i>	Rosebud orchid; spreading pogonia	E	
<i>Cleistesiosis oricamporum</i>	Fragrant pogonia; coastal plain pogonia	E	
<i>Ctenium floridanum</i>	Florida toothachegrass	E	
<i>Garberia heterophylla</i>	Garberia	T	
<i>Hartwrightia floridana</i>	Hartwrightia	T	
<i>Helianthus carnosus</i>	Lakeside sunflower; flatwoods sunflower	E	
<i>Isoetes appalachiana</i>	Appalachian quillwort	E	
<i>Isoetes boomii</i>	Boom's quillwort	E	
<i>Lilium catesbaei</i>	Catesby's lily; pine lily	T	
<i>Linum westii</i>	West's flax	E	
<i>Litsea aestivalis</i>	Pondspice	E	
<i>Lobelia cardinalis</i>	Cardinalflower	T	
<i>Marshallia ramosa</i>	Southern barbara's buttons	E	
<i>Matelea floridana</i>	Florida milkvine; florida spiny pod	E	
<i>Matelea pubiflora</i>	Trailing milkvine; sandhill spiny pod	E	
<i>Orbexilum virgatum</i>	Pineland leatherroot	E	
<i>Pinckneya bracteata</i>	Fevertree	T	
<i>Pinguicula caerulea</i>	Blueflower butterwort	T	
<i>Pinguicula lutea</i>	Yellow butterwort; yellow-flowered butterwort	T	

Scientific Name	Common Name	State Status	Federal Status
<i>Platanthera blephariglottis</i> var. <i>Conspicua</i>	White fringed orchid	T	
<i>Platanthera ciliaris</i>	Yellow fringed orchid	T	
<i>Platanthera cristata</i>	Crested yellow orchid; crested fringed orchid	T	
<i>Platanthera flava</i>	Southern tubercled orchid; palegreen orchid; gypsy-spikes	T	
<i>Platanthera nivea</i>	Snowy orchid	T	
<i>Pogonia ophioglossoides</i>	Rose pogonia; snakemouth orchid	T	
<i>Pteroglossaspis ecristata</i>	Giant orchid; non-crested eulophia	T	
<i>Pycnanthemum floridanum</i>	Florida mountainmint	T	
<i>Rhododendron minus</i> var. <i>Chapmanii</i>	Chapman's rhododendron	E	E
<i>Rudbeckia nitida</i>	Shiny coneflower; st. John's susan	E	
<i>Ruellia noctiflora</i>	Nightflowering wild petunia	E	
<i>Sarracenia minor</i>	Hooded pitcherplant	T	
<i>Schoenolirion croceum</i>	Yellow sunnysbell	E	
<i>Sideroxylon lycioides</i>	Buckthorn bully; gopherwood buckthorn	E	
<i>Stylisma abdita</i>	Showy dawnflower; hidden stylisma; austin's dawnflower	E	
<i>Verbesina heterophylla</i>	Diverseleaf crownbeard	E	
<i>Zephyranthes atamasca</i>	Atamasco lily; rainlily	T	
<i>Zephyranthes atamasca</i> var. <i>Treatiae</i>	Treat's zephyrlily; treat's rainlily	T	

Sources: Florida Natural Areas Inventory, 2017 (<http://www.fnai.org>) and (<http://florida.plantatlas.usf.edu/>).

Invasive Plants

The Florida Exotic Pest Plant Council (FLEPPC) has a mission to support the management of invasive exotic plants in Florida's natural areas by providing a forum for the exchange of scientific, educational, and technical information. FLEPPC compiles invasive species lists that are revised every two years. Professional botanists and others perform exhaustive studies to determine invasive exotic plants that should be placed on the lists. Invasive exotic plants are termed:

- Category I invasives when they are altering native plant communities by displacing native species, changing community structures or ecological functions, or hybridizing with natives. This definition does not rely on the economic severity or geographic range of the problem, but on the documented ecological damage caused.
- Category II invasive exotics have increased in abundance or frequency but have not yet altered Florida plant communities to the extent shown by Category I species. These species may become Category I if ecological damage is demonstrated.

This comprehensive list can be found at <http://www.fleppc.org/list/list.htm>.

More species-specific location information is tracked by the Early Detection and Distribution Mapping System (EDDMapS). EDDMapS is a web-based mapping system for documenting invasive species distribution. Launched in 2005 by the Center for Invasive Species and Ecosystem Health at the University of Georgia, it was originally designed as a tool for state Exotic Pest Plant Councils to develop more complete distribution data of invasive species. A more in-depth analysis of each species listed by the FLEPPC through EDDMapS will confirm presence and location of invasive plants in Clay County.

The EDDMapS system can be viewed at <https://www.eddmaps.org/>.

The presence of invasive plants in Clay County is confirmed by these two data systems. There are programs in place that seek to limit the growth in the volume of and frequency of invasive plants in Clay County as well as the State of Florida.

C. 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 commented 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 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 Conversation Element objectives or policies that 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 Conversation Element objectives or policies that 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 Conversation Element objectives or policies that 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.

The existing Conservation Element as written adequately covers this issue as stated. Many of the objectives and policies work toward protecting the environment and either directly or indirectly affect the protection of the water quality of the spring and lakes.

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 Conservation Element objectives or policies that relate to or otherwise impact this issue.

D. Matrix for Evaluating Plan Policies

As part of the evaluation of the 2025 Comprehensive Plan's Conservation Element, the County evaluated 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?

Conservation	Measurable Target	Defined Terms	Achieved	Major Issue	Statute Requires	Supports Others	Observations
GOAL 1	No	No		Yes	No	No	
OBJ 1.1	No	No		Yes	No	No	References EPA standards that may have measurable targets. We need the specific reference.
POLICY 1.1.1	No	No		Yes	No	Yes	Reference to Transportation Element
POLICY 1.1.2	No	No		Yes	No	No	
OBJ 1.2	No	No		Yes	No	No	9J-5 citation: This reference may have measurable targets. We need the specific reference.
POLICY 1.2.1	No	No		Yes	No	No	
POLICY 1.2.2	No	No		Yes	Yes		Rule 62-303 FAC: This reference may have measurable targets. We need the specific reference.
POLICY 1.2.3	No	No		Yes	No	No	
POLICY 1.2.4	No	No		No	No	No	Could be connected to environmental issue...but doesn't specify.
POLICY 1.2.5	No	No		Yes	No	No	
POLICY 1.2.6	No	No		Yes	No	No	
POLICY 1.2.7	No	No		Yes	No	No	References other requirements that may have measurable targets. We need the specific reference.
POLICY 1.2.8	No	No		Yes	No	No	
POLICY 1.2.9	No	No		Yes	Yes	No	Rule 64E-6 FAC
POLICY 1.2.10	No	No		Yes	No	No	
POLICY 1.2.11	No	No		Yes	No	No	References future "statewide" requirements/standards that have yet to be adopted.

Conservation	Measurable Target	Defined Terms	Achieved	Major Issue	Statute Requires	Supports Others	Observations
POLICY 1.2.12	No	No		Yes	No	No	
POLICY 1.2.13	No	No		Yes	No	No	
POLICY 1.2.14	No	No		Yes	Yes	No	Rule 40C-8 FAC: This reference may have measurable targets. We need the specific reference.
POLICY 1.2.15	No	No		Yes	No	No	
OBJ 1.3	No	No		Yes	Yes	No	9J-5 citation: This reference may have measurable targets. We need the specific reference.
POLICY 1.3.1	No	No		Yes	No	Yes	Reference to Community Facilities Element Policy 6.1
POLICY 1.3.2	Yes	No		Yes	Yes	No	Chapter 62 FAC (multiple). Measurable targets might not be complete within the Policy and need to confirm the referenced FAC rule has more and is valid.
POLICY 1.3.3	Yes	No		Yes	Yes	No	Chapter 62 FAC (multiple). Measurable targets might not be complete within the Policy and need to confirm the referenced FAC rule has more and is valid. Makes reference to Policy 3.2 within this Element.
POLICY 1.3.4	Yes	No		Yes	No	No	
POLICY 1.3.5	No	No		Yes	No	No	References other standards that may have measurable targets. We need the specific reference.
POLICY 1.3.6	No	No		Yes	No	No	References other standards that may have measurable targets. We need the specific reference.
OBJ 1.4	No	No		Yes	Yes	No	9J-5 citation: This reference may have measurable targets. We need the specific reference.
POLICY 1.4.1	No	No		Yes	No	No	
POLICY 1.4.2	No	No		Yes	Yes	No	Rule 40C-21 FAC
POLICY 1.4.3	No	No		Yes	No	No	
POLICY 1.4.4	No	No		Yes	No	No	
POLICY 1.4.5	No	No		Yes	No	No	References other standards that may have measurable targets. We need the specific reference.
POLICY 1.4.6	No	No		Yes	No	No	
OBJ 1.5	No	No		Yes	No	No	
POLICY 1.5.1	No	No		Yes	No	No	
POLICY 1.5.2	Yes	No		Yes	No	No	Makes reference to Policy 5.1 within this Element.
POLICY 1.5.3	No	No		Yes	No	No	

Conservation	Measurable Target	Defined Terms	Achieved	Major Issue	Statute Requires	Supports Others	Observations
POLICY 1.5.4	Yes	No		Yes	No	No	
POLICY 1.5.5	Yes	No		Yes	No	No	The measurable target would be having the developer submit a "habitat management plan". More specifics are needed
POLICY 1.5.6	No	No		Yes	No	No	
POLICY 1.5.7	No	No		Yes	No	No	
POLICY 1.5.8	No	No		Yes	No	No	
POLICY 1.5.9	No	No		Yes	No	No	
POLICY 1.5.10	No	No		Yes	No	No	
POLICY 1.5.11	No	No		Yes	No	No	References other requirements that may have measurable targets. We need the specific reference.
POLICY 1.5.12	No	No		Yes	No	No	
POLICY 1.5.13	No	No		Yes	No	No	
POLICY 1.5.14	No	No		Yes	No	No	
POLICY 1.5.15	No	No		Yes	No	No	
POLICY 1.5.16	No	No		Yes	No	No	
POLICY 1.5.17	No	No		Yes	No	No	
OBJ 1.6	No	No		Yes	No	No	
POLICY 1.6.1	No	No		Yes	No	No	References other requirements that may have measurable targets. We need the specific reference.
POLICY 1.6.2	No	No		Yes	No	No	
POLICY 1.6.3	No	No		Yes	No	No	
POLICY 1.6.4	No	No		Yes	No	No	
OBJ 1.7	No	No		Yes	No	No	
POLICY 1.7.1	Yes	No		Yes	No	No	
POLICY 1.7.2	Yes	No		Yes	No	No	
POLICY 1.7.3	No	No		Yes	No	No	
POLICY 1.7.4	No	No		Yes	No	No	

Conservation	Measurable Target	Defined Terms	Achieved	Major Issue	Statute Requires	Supports Others	Observations
OBJ 1.8	No	No		Yes	No	No	9J-5 citation: This reference may have measurable targets. We need the specific reference.
POLICY 1.8.1	No	No		Yes	No	No	
POLICY 1.8.2	No	No		Yes	No	No	
POLICY 1.8.3	No	No		Yes	No	No	
POLICY 1.8.4	No	No		Yes	No	No	Makes reference to Policy 5.1 within this Element.
POLICY 1.8.5	No	No		Yes	No	No	
OBJ 1.9	No	No		Yes	No	No	9J-5 citation: This reference may have measurable targets. We need the specific reference.
POLICY 1.9.1	No	No		Yes	No	No	
POLICY 1.9.2	No	No		Yes	No	No	
OBJ 1.10	No	No		Yes	Yes	No	Chapter 163.3177(d) F.S reference
POLICY 1.10.1	Yes	No		Yes	No	No	
POLICY 1.10.2	No	No		Yes	No	No	
POLICY 1.10.3	No	No		Yes	No	No	
POLICY 1.10.4	No	No		Yes	No	No	Makes reference to Objective 8 within this Element.

E. Assessment of Changes to Florida Statutes

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

2011 Legislation ("Community Planning Act")

- Modifies requirements for the conservation element to include portions of repealed Rule 9J-5.013, Florida Administrative Code, to list the natural resources to be identified, analyzed and protected and toward which conservation principles, guidelines and standards are to be directed. No amendment necessary.
- Modifies requirements for analyzing current and projected water sources for a 10-year period to include consideration of demands for industrial, agricultural and potable water use and the quality and quantity of water available to meet these demands and the existing levels of conservation, use and protection and policies of the regional water management district. Amend the Conservation Element to include policy that considers projected needs and sources for a minimum 10-year period.

F. Conclusions and Proposed Revisions

The Comprehensive Plan is substantively up-to-date and the County has done a good job of implementing its Comprehensive Plan. Most necessary amendments are those as required by changes in State law, or to provide greater emphasis on issues of particular importance to Clay County.

- Add the name of the Element to all GOPs to better differentiate among others in the Comprehensive Plan.
- Identify all Policies with three numbers for consistency with numerical style already used in the Future Land Use Element, Housing Element, and Transportation Element.
- Eliminate all references to Rule 9J-5, Florida Administrative Code as it no longer exists and was replaced by the Community Planning Act in 2011.

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

Proposed Amendment to CON Policy 1.1.1

In order to establish an Identify measurable target:

CON POLICY 1.1.1

To reduce pollution generated from automobiles, the County shall:

- a) Maintain a Traditional Neighborhood Development zoning category that reduces vehicle miles travelled.
- b) Continue to enforce the provisions of the tree protection and landscaping ordinance requiring landscaping and vegetative buffers between arterial roadways and new residential developments.
- c) Ensure that sidewalks, bicycle paths, and bicycle lanes are provided in new and infill development as required under the Transportation Element and the Future Land Use Element of this Plan.
- d) Adopt a Greenways and Trails Master Plan by 2019 to encourage non-motorized transportation and recreation on a County-wide basis.
- e) Encourage efficient traffic flow by maintaining adequate levels of service on County roadways as required under the Transportation Element of this Plan.

Proposed Amendment to CON Policy 1.2.2

In order to establish an Identify measurable target:

CON POLICY 1.2.2

Develop a Master Stormwater Management Plan, including existing stormwater plans, that shall identify and prioritize specific stormwater problems and recommendations for eliminating these sources of pollution.

Such Master Stormwater Management Plan shall include strategies to meet any established Total Maximum Daily Loads and/or Pollutant Reduction Goals adopted pursuant to Rule 62-303 F.A.C.

Such Master Stormwater Management Plan shall be completed in phases as funds are available. The phasing shall be determined by Public Works with a target date of completion no later than December 31, 2025.

Proposed Amendment to CON Policy 1.3.1

Minor update to change the reference to CFE Element 6.1 to 1.6.1:

CON POLICY 1.3.1

Areas shown by the SJRWMD to potentially contribute 8 inches or more per year of recharge to the Floridan aquifer are designated as high recharge areas as shown on the Floridan Aquifer Recharge Map. An Aquifer Recharge Overlay Zone showing these high recharge areas shall be created in the land development regulations, and shall be protected from incompatible land uses to ensure adequate recharge rates and water quality maintenance. The County will coordinate with the St. Johns River Water Management District to review the recharge protection standards as new data becomes available. The requirements of Community Facilities Element Policy 1.6.1 shall apply.

Proposed New Amendment (CON Policy 1.3.7)

In order to achieve consistency with Florida Statutes a new policy has been created for water source needs.

CON POLICY 1.3.7

The County shall coordinate on a regular basis with the Clay County Utility Authority (CCUA) and the St. Johns River Water Management District (SJRWMD) to analyze current and projected sustainable water sources for at least a 10-year period. The demands for industrial, agricultural and potable water use and the quality and quantity of water available to meet the current demands. This analysis shall be conducted pursuant to Section 163.3177(6)(d)3 of the Florida Statutes.

Proposed Amendment to CON Policy 1.10.1

In order to update the measurable target:

CON POLICY 1.10.1

The County shall investigate methods to improve energy efficiency in building construction and development site design, such as but not limited to: encouraging independent certifications of energy efficiency in new development beyond the minimum required in the effective building code, supporting creative patterns of site design and orientation, and revising minimum dwelling size requirements in land development regulations.

By ~~2044~~ 2019, Clay County shall determine a threshold and criteria for requiring LEED standards/certification in development and redevelopment projects, and implement through update to the land development code. In addition, consider pilot incentive programs to encourage green building and development.

EXHIBIT D

INTRODUCTION

PURPOSE AND INTENT OF THE CONSERVATION ELEMENT

The Conservation Element provides the framework for the preservation, protection and wise use of the County's natural resources. The intent of this element is to provide a basis for effective decision-making regarding the appropriate use of natural resources when faced by increasing growth and urban development, in addition to the identification and preservation of important ecological systems.

Despite the rapid growth experienced in the County over the last three decades, there remains an abundance of natural resources. However, as growth pressures increase, so does the need for protection and management of these resources. This element undertakes a responsible approach to stewardship of natural resources by recognizing the contribution of these resources to Clay County's quality of life.

The goals, objectives, and policies concerning natural resources have been divided into five main areas: air quality, water resources, natural vegetative communities and wildlife, mineral resources and soils, wetlands and floodplains, and hazardous waste management.

Air quality is not considered to be a major problem at the present. However, measures are included to prevent substantial degradation of the County's air quality as growth continues.

Preventing further harm to the water quality of the County's lakes, rivers, and groundwater is high on the agenda of this element. A program to implement protection of County waters along with methods to ensure the continuing natural functions of water bodies, wetlands and floodplains.

Protection measures are proposed to conserve important areas of native vegetation through a range of techniques. Perhaps the best protective technique of all will be through the designation of land uses in the Future Land Use Element. The best examples of diverse ecological communities are found in undeveloped areas. Once such communities are identified, they can best be protected by directing urban growth away from them. A program of identification will be undertaken, and growth into those areas will be regulated. Wildlife protection is accomplished by preserving habitat necessary to the survival of wildlife species.

Future land use designation of areas appropriate for the extraction of mineral resources will serve to protect the economic value of these areas by preventing encroachment of other types of development. At the same time, measures to minimize environmental degradation from the adverse impacts of mining activities.

The management of hazardous waste is a continuing concern statewide and nationally. Proposals are included to address the County's progressive role in ensuring proper management of these wastes.

The element also contains policies to identify and prioritize the options available for acquisition and protection of environmentally sensitive lands.

The statement of goals, objectives, and policies in this Conservation Element is one of the foundations for the revision, preparation, and adoption of land development regulations to. These policies are derived from an analysis of the existing conditions within the natural environment of the County, as well as an examination of the other elements of the Comprehensive Plan.

The following goals, objectives, and policies have been developed for the use of local policy makers in guiding and directing the decision-making process regarding the conservation of natural resources. For purposes of definition, the included goals are a generalized statement of a desired end state toward which objectives and policies are directed. The objectives provide the attainable and measurable ends toward which Clay County directs specific efforts. The policies provided are the specific recommended actions that the County will follow in order to achieve the identified objectives.

CON GOAL 1

To preserve, conserve and appropriately manage the natural resources of Clay County and provide protection of environmentally sensitive lands, life and property from natural and man-made hazards.

CON OBJ 1.1

The County shall protect ambient air quality such that it meets or exceeds minimum standards as defined by the United States Environmental Protection Agency.

CON POLICY 1.1.1

To reduce pollution generated from automobiles, the County shall:

- a) Maintain a Traditional Neighborhood Development zoning category that reduces vehicle miles travelled.
- b) Continue to enforce the provisions of the tree protection and landscaping ordinance requiring landscaping and vegetative buffers between arterial roadways and new residential developments.
- c) Ensure that sidewalks, bicycle paths, and bicycle lanes are provided in new and infill development as required under the Transportation Element and the Future Land Use Element of this Plan.
- d) Adopt a Greenways and Trails Master Plan to encourage non-motorized transportation and recreation on a County-wide basis.
- e) Encourage efficient traffic flow by maintaining adequate levels of service on County roadways as required under the Transportation Element of this Plan.

CON POLICY 1.1.2

The County shall continue to enforce the Tree Protection and Landscaping Ordinance.

CON OBJ 1.2

The County shall prevent further degradation of ambient water quality and conserve and protect the quantity of surface water resources.

CON POLICY 1.2.1

The County shall regulate future waterfront development (excluding manmade lakes or stormwater facilities). The following criteria shall apply:

- a) All structures shall be set back a minimum of 50 feet landward from the Ordinary High-Water Line or Mean High Water Line, whichever is applicable; for waters designated as Aquatic Preserves or Outstanding Florida Waters, the setback will be 100 feet. In the case of lakes that have not been meandered and without an established Ordinary High Water Line, the historical high shall be used as the appropriate high water line. These setbacks shall not apply to development within platted residential subdivisions located landward of permitted bulkheads, including docks, boardwalks, and similar structures which are related to the development of the subdivision.

These setbacks shall not apply to water dependent uses and recreational facilities, including bulkheads, boardwalks, docks, and boathouses, when constructed pursuant to permits issued by the St Johns River Water Management District. *Amendment 06-2, November 2006.*

- b) All Onsite Sewage Disposal Systems septic tanks and drain fields shall be set back a minimum of 100 feet landward from the appropriate high water line as permitted by state rule or allowed by the applicable permitting agency; for waters designated as Aquatic Preserves or Outstanding Florida Waters, the setback shall be 150 feet.

All Onsite Sewage Treatment Systems shall be located on the landward side of the primary structure except that infill lots within existing development served by onsite sewage disposal systems shall be exempted when state requirements for the distance between wells and onsite sewage treatment systems cannot be obtained.

- c) A 25-foot buffer zone of native vegetation shall be preserved landward of the Ordinary High Water Line or Mean High Water Line, whichever is applicable, or the historical high in the case of lakes without an established Ordinary High Water Line. Exceptions shall be made to trim vegetation within the buffer in order to maintain water views. Up to 25 linear feet or 20 percent of the buffer (whichever is greater) can be removed for the placement of water-dependent uses including dock walkways, boat ramps, etc. Where the length of shoreline exceeds 250 feet within areas of the county subject to the Manatee Protection Plan, no more than 50 linear feet of native shoreline vegetation shall be altered (trimmed, cut, removed, killed, or destroyed). *Amendment 07-2, November 2007.*

Waterfront lot widths shall be a minimum of one hundred (100) feet at the Ordinary High Water Line or the Mean High Water Line, whichever is applicable, or the historical high in the case of lakes without an established Ordinary High Water Line.

CON POLICY 1.2.2

Develop a Master Stormwater Management Plan, including existing stormwater plans, that shall identify and prioritize specific stormwater problems and recommendations for eliminating these sources of pollution.

Such Master Stormwater Management Plan shall include strategies to meet any established Total Maximum Daily Loads and/or Pollutant Reduction Goals adopted pursuant to Rule 62-303 F.A.C.

Such Master Stormwater Management Plan shall be completed in phases as funds are available. The phasing shall be determined by Public Works with a target date of completion no later than December 31, 2025.

CON POLICY 1.2.3

The County shall continue to enforce adopted land development regulations which contain provisions in the site plan review process to prevent soil erosion and subsequent off-site siltation of surface water bodies.

CON POLICY 1.2.4

Clay County shall continue to mark and enforce boating speed zones where appropriate (including Black Creek) to reduce shore erosion.

CON POLICY 1.2.5

The County shall continue to enforce Land Development Regulations requiring identification of wetlands on all development plans.

CON POLICY 1.2.6

Unless determined to be permissible by the State and Clay County Health Department, onsite sewage treatment and disposal systems shall be prohibited in floodways and the 10 year floodplain.

CON POLICY 1.2.7

All septic tanks permitted shall meet or conform to State and Clay County Health Department requirements.

CON POLICY 1.2.8

Permits for onsite sewage treatment and disposal systems shall not be issued for lots with less than one-half acre of net usable land exclusive of marsh, wetland, surficial water bodies, roads, etc.

CON POLICY 1.2.9

Inspections of existing onsite sewage treatment and disposal systems shall be required when such system or related dwelling unit is altered, enlarged or replaced, if the system has not been inspected within 3 years, as required by Rule 64E-6 F.A.C.

CON POLICY 1.2.10

The County shall continue to require, at the time of development or redevelopment, the provision of stormwater management facilities that prevent direct stormwater discharge to a receiving water body. Development of individual single family lots shall include the provision of a swale and berm landward of the Ordinary High Water Line or Mean High Water Line, or the historical high on lakes without an established Ordinary High Water Line, whichever is applicable, whenever a community stormwater facility is not associated with development of the lot.

CON POLICY 1.2.11

At such time as new statewide stormwater management requirements or water management district stormwater management requirements are adopted, the County shall update land development regulations to conform to the new standards.

CON POLICY 1.2.12

The County shall coordinate with the SRJWMD and FDEP to identify water quality problems and to propose solutions for resolving them. Priority shall be given to state-adopted impaired waters with established Total Maximum Daily Loads.

CON POLICY 1.2.13

The County shall maintain its capital and user-funded strategic road-paving program to pave roads in areas where water bodies have been determined to be significantly impacted by erosion and siltation from unpaved roads. The County shall continue to pursue all available funding mechanisms for this program.

CON POLICY 1.2.14

The County shall coordinate with the SJRWMD to develop strategies for maintaining adequate water levels and flows in water bodies with Minimum Flows and Levels established by Rule 40C-8 F.A.C.

CON POLICY 1.2.15

The County shall encourage golf courses, agricultural, and silvicultural operations to follow applicable Best Management Practices and/or Interim Measures that include water quality protection or water conservation criteria. These may include but are not limited to Best Management Practices and Interim Measures published by the USDA Natural Resources Conservation Service (NRCS), University of Florida Institute of Food and Agriculture Sciences (IFAS), the Florida Department of Environmental Protection, the Florida Department of Agriculture and Consumer Services, the Florida Department of Community Affairs, or the St. Johns River Water Management District, and those included in F.A.C. rules or the Code of Federal Regulations adopted by these same agencies.

CON OBJ 1.3

The County shall prevent further degradation of ambient water quality and conserve and protect the quantity of groundwater resources.

CON POLICY 1.3.1

Areas shown by the SJRWMD to potentially contribute 8 inches or more per year of recharge to the Floridan aquifer are designated as high recharge areas as shown on the Floridan Aquifer Recharge Map. An Aquifer Recharge Overlay Zone showing these high recharge areas shall be created in the land development regulations, and shall be protected from incompatible land uses to ensure adequate recharge rates and water quality maintenance. The County will coordinate with the St. Johns River Water Management District to review the recharge protection standards as new data becomes available. The requirements of Community Facilities Element Policy 1.6.1 shall apply.

CON POLICY 1.3.2

The County Development Services Department shall coordinate with the Clay County Health Department to protect groundwater quality near potable water supply wells. The County shall establish a primary wellhead protection zone having a radius of 500 feet around all potable water supply wells. Potable water supply wells shall be defined as all public and private potable water wells which serve a minimum of 15 service connections used by year round residents, or serving at least 25 year round residents. Within the wellhead protection zone, all facilities and activities shall comply with the Wellhead Protection Rule (62-521 F.A.C.).

- a) New domestic wastewater treatment facilities shall be provided with Class I reliability as described in Chapter 62-600, F.A.C., and flow equalization. New wastewater ponds, basins, and similar facilities shall be lined or sealed to prevent measurable seepage. Unlined reclaimed water storage systems are allowed for reuse projects permitted under Part III of Chapter 62-610, F.A.C.
- b) New reuse and land application projects shall be prohibited except for new projects permitted under Part III of Chapter 62-610, F.A.C.
- c) New domestic wastewater residuals land application sites, as defined in Chapter 62-640, F.A.C., shall be prohibited.
- d) New discharges to ground water of industrial wastewater, as regulated under Chapters 62-660, 62-670, 62-671, and 62-673, F.A.C., shall be prohibited except as provided below:
 - 1) All non-contact cooling water discharges (without additives); and
 - 2) Discharges specifically allowed within a wellhead protection area in Chapters 62-660, 62-670, 62-671, and 62-673, F.A.C.
- e) New phosphogypsum stack systems, as regulated under Chapter 62-673, F.A.C., are prohibited.
- f) New Class I and Class III underground injection control wells, as regulated in Chapter 62-528, F.A.C., are prohibited.
- g) New Class V underground injection control wells, as regulated in Chapter 62-528, F.A.C., are prohibited except as provided below:
 - 1) Thermal exchange process wells (closed-loop without additives) for use at single family residences; and
 - 2) Aquifer storage and recovery systems wells, where the injected fluid meets the applicable drinking water quality standards in Chapter 62-550, F.A.C.
- h) New solid waste disposal facilities regulated under Chapter 62-701, F.A.C., are prohibited.
- i) New generators of hazardous waste, as regulated under Chapter 62-730, F.A.C., which excludes household hazardous waste as defined in 40 C.F.R. Part 261.4(b)(1) (1994), hereby incorporated and adopted by reference, shall comply with the secondary containment requirements of 40 C.F.R. Part 264 Subpart I (1994), hereby incorporated and adopted by reference.
- j) New hazardous waste treatment, storage, disposal, and transfer facilities requiring permits under Chapter 62-730, F.A.C., are prohibited.
- k) New aboveground and underground tankage of hazardous wastes regulated under Chapter 62-730, F.A.C., is prohibited.

- l) Underground storage tanks regulated under Chapter 62-761, F.A.C., shall not be installed 90 days after the effective date of this rule. Replacement of an existing underground storage tank system regulated under Chapter 62-761, F.A.C., within the same excavation, or addition of new underground storage tanks regulated under Chapter 62-761, F.A.C., at a facility with other such underground storage tanks is exempt from this provision, provided that the replacement or new underground storage tank system is installed with secondary containment as required in Chapter 62-761, F.A.C.
- m) Aboveground storage tanks regulated under Chapter 62-762, F.A.C., shall not be installed 90 days after the effective date of this rule. Replacement or upgrading of an existing aboveground storage tank or addition of new aboveground storage tanks which are regulated under Chapter 62-762, F.A.C., at a facility with other such aboveground storage tanks is exempt from this provision, provided that the replacement or new aboveground storage tank system meets the applicable provisions of Chapter 62-762, F.A.C.
- n) Storage tanks which meet the auxiliary power provisions of Rule 62-555.320(6), F.A.C., for operation of a potable water well and storage tanks for substances used for the treatment of potable water are exempt from the provisions of this rule. Storage tanks regulated under Chapters 62-761 and 62-762, F.A.C., shall continue to meet the requirements of those chapters.

Amendment 05-2, November 2005.

CON POLICY 1.3.3

New wells shall meet the requirements stated in Policy 3.2 and shall additionally be located according to Rule 62-555.312(3) F.A.C. as follows:

New wells shall be located no closer than 100 feet from other sanitary hazards that pose a potentially high risk to ground water quality and public health and shall be located no closer than 50 feet from other sanitary hazards that pose a moderate risk to ground water quality and public health. The following are examples of other sanitary hazards that pose a potentially high risk: active or abandoned mines; airplane or train fueling or maintenance areas at airports and railroad yards; animal feeding operations other than those regulated under Rule 62-670.500, F.A.C.; concentrated aquatic animal production facilities; domestic wastewater collection/transmission systems; drainage or injection wells, oil or gas production wells, and improperly constructed or abandoned wells (i.e., wells not constructed or abandoned in accordance with Chapter 62-532, F.A.C.); fertilizer, herbicide, or pesticide storage areas at agricultural sites, golf courses, nurseries, and parks; graveyards; impoundments and tanks that process, store, or treat domestic wastewater, domestic wastewater residuals, or industrial fluids or waste and that are not regulated under Rule 62-670.500, F.A.C.; industrial waste land application areas other than those regulated under Rule 62-670.500, F.A.C.; junkyards and salvage or scrap yards; pastures with more than five grazing animals per acre; pipelines conveying petroleum products, chemicals, or industrial fluids or wastes; and underground storage tanks that are not regulated under Chapter 62-761, F.A.C., but are used for bulk storage of a liquid pollutant or hazardous substance (as defined in Chapter 62-761, F.A.C.) other than sodium hypochlorite solution. The following are examples of other sanitary hazards that pose a moderate risk: aboveground storage tanks that are not regulated under Chapter 62-761, F.A.C., but are used for bulk storage of a liquid pollutant or hazardous substance (as defined in Chapter 62-761, F.A.C.) other than sodium hypochlorite solution; fertilizer, herbicide, or pesticide application areas that are not under the ownership or control of the supplier of water at agricultural sites, golf courses, nurseries, and parks; railroad tracks; stormwater detention or retention basins; and surface water.

The Clay County Development Services Department shall coordinate with the County Health Department, Florida department of Environmental Protection, and other applicable agencies to prohibit construction of the above named sanitary hazards within the buffer zone during the entire useful life of the well. *Amendment 05-2, November 2005.*

CON POLICY 1.3.4

Adequate water supplies and potable water facilities shall be in place and available to serve new development no later than the issuance by the Clay County of a certificate of occupancy or its functional equivalent. Prior to approval of a building permit or its functional equivalent, the Clay County shall consult with the applicable water supplier to determine whether adequate water supplies to serve the new development will be available no later than the anticipated date of issuance of a certificate of occupancy or its functional equivalent.

CON POLICY 1.3.5

All new water wells shall be cased to SJRWMD and/or other applicable state standards to ensure that they do not provide a means of groundwater contamination.

CON POLICY 1.3.6

The County shall encourage golf courses, agricultural, and silvicultural operations to follow applicable Best Management Practices and/or Interim Measures that include water quality protection or water conservation criteria. These may include but are not limited to Best Management Practices and Interim Measures published by the USDA Natural Resources Conservation Service (NRCS), University of Florida Institute of Food and Agriculture Sciences (IFAS), the Florida Department of Environmental Protection, the Florida Department of Agriculture and Consumer Services, the Florida Department of Community Affairs, or the St. Johns River Water management District, and those included in F.A.C. rules or the Code of Federal Regulations adopted by these same agencies.

CON POLICY 1.3.7

The County shall coordinate on a regular basis with the Clay County Utility Authority (CCUA) and the St. Johns River Water Management District (SJRWMD) to analyze current and projected sustainable water sources for at least a 10-year period. The demands for industrial, agricultural and potable water use and the quality and quantity of water available to meet the current demands. This analysis shall be conducted pursuant to Section 163.3177(6)(d)3 of the Florida Statutes.

CON OBJ 1.4 The County shall conserve potable water resources.**CON POLICY 1.4.1**

The County shall continue its water conservation programs which require the use of water-saving devices and xeriscaping, and promote water conservation through public education and awareness.

CON POLICY 1.4.2

Clay County will continue to adhere to the St. Johns River Water Management District's emergency water shortage plan as set forth in Rule 40C-21, F.A.C.

CON POLICY 1.4.3

The County shall prohibit new water-to-air heat pumps except for those that utilize a closed-loop water circulation system.

CON POLICY 1.4.4

The County shall encourage the use of reclaimed water for residential irrigation and other beneficial uses based on availability.

CON POLICY 1.4.5

All new water wells shall be cased to SJRWMD and/or other applicable state standards to ensure that they do not provide a means of groundwater contamination.

The County shall encourage new development, including golf courses, to seek independent conservation certifications that include water conservation criteria, such as but not limited to the

Audubon International Signature Program for golf courses, Florida Yards and Neighborhoods, Florida Water StarSM, or Leadership in Energy and Environmental Design (LEED) Green Building Rating SystemTM.

CON POLICY 1.4.6

The County shall investigate the feasibility and potential benefit of implementing additional conservation strategies such as an irrigation ordinance and encouraging Low Impact Development Design concepts that utilize stormwater for irrigation as well as reducing the overall need for landscape irrigation.

CON OBJ 1.5 The County shall regulate new development to ensure the preservation and protection of floodplains, wetlands, upland native vegetation communities, wildlife and fisheries.

CON POLICY 1.5.1

The Clay County Planning and Zoning Division shall develop and maintain an inventory of environmentally sensitive areas which shall include 100-year floodplains as designated by FEMA; wetlands; Outstanding Florida Waters as designated by DEP; listed wildlife species populations; habitats supporting wildlife species listed as endangered, threatened, or species of special concern by the USFWS or the FFWCC; sandhill, scrub, or other natural biological communities identified by Florida Natural Areas Inventory as imperiled or critically imperiled; existing public and private conservation areas (such as wildlife preserves and fish or wildlife management areas, state parks, water management district conservation areas, resource-based parks and recreation areas, state forests, lands in the National Park system, National Forest system, or National Wildlife Refuge system, and lands owned and managed for other conservation purposes by public agencies or private conservation organizations) and areas identified by the SJRWMD as having 8 inches or more annual recharge to the Floridan Aquifer.

CON POLICY 1.5.2

Adopt or amend land development regulations to regulate development which impacts upon environmentally sensitive areas, as defined in Policy 5.1, and which address, at a minimum:

- a) Proper siting of development structures and infrastructure, including clustering of dwelling units away from sensitive areas.
- b) Restrictions on the uses allowed in listed species habitats to those found to be compatible with the requirements of wildlife species which are threatened, endangered, or of special concern as identified by the USFWS or FFWCC.
- c) Buffer zones of native vegetation adjacent to surface water bodies to prevent erosion, retard runoff, and provide habitat, including setback requirements for buildings and other structures.
- d) Management plans which protect listed wildlife.
- e) Providing incentives, where applicable, to encourage minimizing the environmental impacts of development.

CON POLICY 1.5.3

The County shall utilize other techniques to protect environmentally sensitive lands, including tax incentives, cluster development; TDRs, conservation easements and fee-simple acquisition.

CON POLICY 1.5.4

New residential development of 50 acres or more located outside the Central Water and Sewer Area and all development within the Mining land use category as depicted on the Future Land Use Map shall be required to provide:

- a) A vegetation map of the site using Level 3 of the Florida Land Use and Cover Classification System (FLUCCS). *Amendment 03-2, November 2003.*

- b) A wildlife survey using Florida Fish and Wildlife Conservation Commission approved methodologies.

CON POLICY 1.5.5

The presence of listed wildlife species, found as a result of Policy 5.4, shall require the developer to submit a habitat management plan to preserve such wildlife. Minimum habitat requirements as established by the Florida Fish and Wildlife Conservation Commission, for each species present, shall be preserved on site. Where sites are too small for on-site preservation, the developer shall apply for necessary wildlife permits and arrange for relocation and/or mitigation as required by the appropriate state and/or federal regulatory agencies. The County will adopt a Listed Species Habitat Protection ordinance which will address requirements of the "Habitat Management Plan."

CON POLICY 1.5.6

The County shall adopt or amend land development regulations which require maintenance of flood storage capacity in FEMA-designated floodways and other portions of the 100-year floodplain as required by applicable federal regulations, elevation of structures, and flood-resistant construction methods.

CON POLICY 1.5.7

The County shall coordinate with appropriate governmental entities to protect environmentally sensitive lands and native vegetative communities which extend into adjacent counties and municipalities.

CON POLICY 1.5.8

The County shall support and coordinate with the appropriate agencies in identifying and preserving known viable wildlife corridors which link public lands.

CON POLICY 1.5.9

To acquire and permanently protect exceptional natural areas, the Clay County Parks and Recreation Division shall coordinate County resources with existing state programs such as the Florida Forever Program, Florida Communities Trust, and with groups such as the Nature Conservancy and the Trust for Public Land.

CON POLICY 1.5.10

Clay County shall coordinate in the identification of hydrologically sensitive areas which require public ownership for adequate water resource protection.

CON POLICY 1.5.11

Clay County shall coordinate with the USFWS and FWC in protecting manatees and their habitats through implementing the Manatee Protection Plan dated January 2006 and approved by FWC June 28, 2006, as subsequently amended.

- a) The Clay County Development Services Department shall coordinate with the USFWS and FWC in administering the boat facilities siting criteria and specific requirements of the Manatee Protection Plan. All new or expanding boat facilities, including marinas with three (3) or more wet and/or dry slips, multi-family residential docks, and all boat ramps shall adhere to the boat facilities siting criteria and specific requirements of the Manatee Protection Plan. These requirements do not apply to individual single-family docks with two (2) or fewer wet and/or dry slips.
- b) The Clay County Parks, Recreation, and Special Events Division shall maintain signage identifying manatee habitat and County boating speed zones, and shall provide educational materials concerning manatees and their protection at boat launch and marina facilities within the three (3) Boat Facility Siting Areas identified in the Manatee Protection Plan. *Amendment 07-2, November 2007.*

CON POLICY 1.5.12

The Clay County Development Services Department shall continue to regulate the excavation and reclamation of borrow pits, in conformance with relevant state regulations.

CON POLICY 1.5.13

All development plans for non-residential, multi-family and residential development shall identify the location of all jurisdictional wetlands as identified by the U.S. Army Corps of Engineers, the Florida Department of Environmental Protection or the St. Johns River Water Management District. Identified wetlands shall be subject to the criteria established for the Conservation designation of the Future Land Use Map.

CON POLICY 1.5.14

In County-owned conservation areas and preserves with degraded and altered features, the County will restore natural hydrology and other features and remove exotic vegetation. *Amendment 04-1, July 2004.*

CON POLICY 1.5.15

In County-owned parks, conservation areas and preserves, undeveloped areas shall be managed for the protection, preservation and restoration of native ecological communities. Priority shall be given to existing populations of imperiled or rare wildlife species and imperiled or rare plant species.

This policy shall not be construed to prohibit the development and use of such areas for compatible recreation activities such as hiking or fishing. Nor shall it be construed to preclude the use of timber management or wildfire mitigation techniques as part of an overall land management program.

CON POLICY 1.5.16

The County shall seek ways to encourage development patterns and practices compatible with wildfire mitigation and prescribed fire management on public conservation lands.

CON POLICY 1.5.17

The County shall review and update external coordination practices as needed to ensure all other necessary agency permits are provided before approving development projects in 100-year floodplains.

CON OBJ 1.6

The County shall have identified and designated areas suitable for the extraction of minerals as a primary use while also adequately protecting air quality, water, soil and wildlife resources from any adverse impacts of mining.

CON POLICY 1.6.1

The County shall adopt and maintain land development regulations that incorporate DEP standards related to mining for the protection of adjacent natural resources. Such standards shall include, at a minimum:

- a) Establishing buffer zones to protect shorelines, stream banks, wetlands, and adjacent land uses from off-site degradation caused by mining.
- b) Implementation of a mine reclamation plan within one year of closure of the site to mining activities. The reclamation plan shall include standards for contouring the site to minimize stormwater velocity and ponding of trapped stormwater and revegetation of all disturbed areas of the site using native vegetation. Open water areas shall be reclaimed to ensure suitable fish and wildlife habitat.
- c) A water use plan for all mining activities, where applicable.

CON POLICY 1.6.2

Mining for peat shall be prohibited in freshwater swamp and marsh habitats.

CON POLICY 1.6.3

The County shall adopt and maintain land reclamation regulations requiring mine operators to guarantee reclamation plans by securing long term performance bonding, establishing a reclamation escrow account or by other means deemed suitable to ensure the land reclamation plan.

CON POLICY 1.6.4

The County shall require mine operators to file a notice of intent with the County to mine before beginning mining operations. The notice shall include mine locations, mine size, method of extraction, reclamation plan, and type of material to be mined.

CON OBJ 1.7 The County shall establish procedures to monitor the collection, storage and disposal of hazardous waste generated in Clay County.

CON POLICY 1.7.1

The County shall maintain at least one collection site for household hazardous waste.

CON POLICY 1.7.2

The County shall hold at least annual household hazardous waste collection days at outlying locations to ensure proper disposal is available to residents at a distance from the central collection facility.

CON POLICY 1.7.3

Clay County solid waste management operations shall monitor incoming refuse to prevent the improper disposal of hazardous wastes.

CON POLICY 1.7.4

Clay County, in conjunction with private and public institutions, will promote an educational/assistance program which will assist industrial and commercial concerns which generate hazardous wastes in reducing, recycling, and/or properly disposing of their hazardous waste.

CON OBJ 1.8 The County shall protect the natural environment from development to ensure the most desirable habitat for existing vegetation and wildlife.

CON POLICY 1.8.1

The County shall develop a wide range of programs for the conservation of native vegetative communities such as: acquisition, easements, and incentive programs and shall encourage the application of native or xerophytic vegetation in landscaping for new development.

CON POLICY 1.8.2

The County shall create landscaping regulations which address the preservation of existing native vegetative communities and the use of native vegetative materials.

CON POLICY 1.8.3

The County shall create lot clearing regulations to preserve native communities and conserve wildlife habitats.

CON POLICY 1.8.4

The County shall adopt minimum open space requirements for new development in the land development regulations. The land development regulations shall specify that a set portion of the open space requirement be met with preserved upland native vegetative communities and wildlife habitat, shall prioritize land characteristics for preservation, and shall encourage connectivity of preserved areas with each other and with existing conservation lands as identified in Policy 5.1.

CON POLICY 1.8.5

The County shall investigate the benefit and feasibility of establishing a County-level acquisition program for environmentally sensitive lands, including an evaluation of potential dedicated funding sources.

CON OBJ 1.9 The County shall conserve, appropriately use and protect soils.**CON POLICY 1.9.1**

The County shall maintain, enforce, and monitor compliance with existing land development regulations requiring soil erosion control measures on construction sites.

CON POLICY 1.9.2

At such time as new statewide and/or water management district stormwater regulations are adopted, the County shall update related land development regulations to ensure they conform with the new state requirements, including provisions for soil erosion control.

CON OBJ 1.10 The County shall work toward achieving energy conservation and reduction of greenhouse gas emissions [163.3177(d) F.S.].**CON POLICY 1.10.1**

The County shall investigate methods to improve energy efficiency in building construction and development site design, such as but not limited to: encouraging independent certifications of energy efficiency in new development beyond the minimum required in the effective building code, supporting creative patterns of site design and orientation, and revising minimum dwelling size requirements in land development regulations.

- a) By 2011, Clay County shall determine a threshold and criteria for requiring LEED standards/certification in development and redevelopment projects, and implement through update to the land development code. In addition, consider pilot incentive programs to encourage green building and development.

CON POLICY 1.10.2

The County shall consider adopting clustering provisions based on proximity to energy distribution facilities.

CON POLICY 1.10.3

The County shall consider encouraging development with site-produced renewable energy sources such as solar or wind power.

CON POLICY 1.10.4

To help offset carbon emissions from the use of fossil fuels and other carbon-based fuels, the County shall preserve native vegetative communities by adhering to the policies of Objective 8 of this element.

Definitions

Conservation – Activities or conditions designated for the purpose of conserving or protecting natural resources or environmental quality, including areas designated for such purposes as flood control, protection of quality or quantity of groundwater or surface water, floodplain management, commercially or recreationally valuable fish and shellfish, or protection of vegetative communities or wildlife habitats.

Natural Resources – Include a variety of ecological resources, including beaches, shores, shorelines, dune, estuary systems, rivers, harbors, floodplains, aquifer recharge areas, wetlands, minerals, wildlife habitat, marine habitat, vegetation, and fisheries.

Ordinary High-Water Line – Line on the shore established by the fluctuations of water and indicated by physical characteristics such as a clear, natural line impressed on the bank, shelving, changes in the character of soil, destruction of terrestrial vegetation, the presence of litter and debris, or other appropriate means that consider the characteristics of the surrounding areas.

Mean High Water Line –The intersection of the tidal plane of mean high water with the shore.

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

¹Board of County Commissioners

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

¹ Board of County Commissioners² 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

¹ Board of County Commissioners**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 Commissioners² 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

¹ Board of County Commissioners

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 Partnership²Board of County Commissioners³Transportation 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

¹Board of County Commissioners

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	

¹ Board of County Commissioners

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.
-

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 Facilities 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.~~

EXHIBIT E

INTRODUCTION

PURPOSE AND INTENT OF THE INTERGOVERNMENTAL COORDINATION ELEMENT

Chapter 163 Florida Statute (FS) provides the statutory authority for local governments to establish an Intergovernmental Coordination Element as part of their comprehensive plan.

It is the purpose of the intergovernmental coordination element to identify and resolve incompatible goals, objectives, policies and development proposed in local government comprehensive plans and to determine and respond to the needs for coordination processes and procedures with adjacent local governments, and regional and state agencies.

ICE GOAL 1

Establish processes among the various governmental, public and private entities to achieve:

- a) Coordination of all development activities.
- b) Preservation of the quality of life.
- c) Efficient use of available resources.

ICE OBJ 1.1

Provide processes for intergovernmental coordination among the County, its municipalities, and regional, state, and federal agencies.

ICE POLICY 1.1.1

The County shall coordinate with its municipalities, the School Board, military installations, regional, state, federal agencies, and other local service providers to identify and discuss issues related to plan implementation, development, and funding which affect one or more of these jurisdictions in such areas as land use, transportation, sewer and water service areas, drainage, recreational facilities, public school facilities, and capital improvement programming, and include, but are not limited to, addressing the actions called for in the policies of the Clay County Comprehensive Plan.

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 186, FS.

ICE POLICY 1.1.3

The County will cooperate with the Historical Commission and other historical/preservation societies and organizations to establish a prioritized list of the top ten sites or objects of historical interest. The County shall continue to communicate and develop intergovernmental agreements with local governments and state and federal agencies on projects that fall within their jurisdictions or are multi-jurisdictional in nature.

ICE POLICY 1.1.4

The County shall continue to maintain Certified Local Government Agreement with the Florida Department of State.

- a. The County Planning and Zoning Division will pursue grants offered through the Florida Department of State and assistance in the protection and recognition of its historical resources.

ICE POLICY 1.1.5

The County shall coordinate and share data annually with local governments, special districts, utility companies, and other agencies to prepare a capacity availability statement for water, sewer, and solid waste.

- a. The County shall cooperate with other local governments, public and private utilities, regional water supply authorities, special districts, and water management districts with regard to potable and reuse water service delivery.

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 Facility Siting and Review and School Concurrency in Clay County, which establishes the process by which collaborative planning and decision making for public school siting and school concurrency is made.

ICE POLICY 1.1.7

The County shall provide to the Clay County School Board annual data related to residential building permits issued and permit locations. The adopted Population Projection Report and proposed amendments thereto shall be provided to the School Board for use in its long range planning efforts.

ICE OBJ 1.2

The County shall establish a means by which Level-of-Service (LOS) standards are coordinated and used consistently throughout the unincorporated and incorporated portions of the County and by other service providers.

ICE POLICY 1.2.1

The County shall coordinate with its municipalities and other service providers to ensure that each jurisdiction's future needs are considered in the acquisition and design of public service facilities.

ICE POLICY 1.2.2

The County shall work with the Florida Department of Transportation (FDOT) and the Transportation Planning Organization (TPO), as necessary, to attain and assure acceptable continued operational levels of service for County's roadways through procedural participation and liaison activities.

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.

ICE POLICY 1.2.4

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

ICE POLICY 1.2.5

The County shall provide a minimum 3 years future capacity for Class I solid waste disposal by entering into a formal agreement with another local government or by executing a contract with a private solid waste disposal provider.

ICE OBJ 1.3

The County shall act to ensure that all planning and development related activities are coordinated with the comprehensive plans or any other plans of adjacent municipalities, counties, the NEFRC, the School Board, and other entities providing services but not having regulatory authority over land use.

ICE POLICY 1.3.1

The County shall initiate and maintain a reciprocal notification procedure of proposed activities and development proposals that could require coordination with its adjacent municipalities and counties so that each can review the proposal's coordination with its comprehensive plan.

ICE POLICY 1.3.2

Under the guidance of the 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.

ICE POLICY 1.3.3

The County shall coordinate with the Northeast Florida Regional Council to achieve and maintain consistency with the Strategic Regional Policy Plan.

ICE POLICY 1.3.4

The County shall establish and maintain consistency between the Future Land Use Plan of the County and those of its adjacent counties and municipalities by:

- a. Identifying all inconsistencies between the Future Land Use Map of the County and its adjacent jurisdictions so as to establish a list of any such inconsistencies prior to the final adoption of the Comprehensive Plan pursuant to the requirements of Chapter 163.FS.
- b. Identifying and implementing procedures to evaluate and reconcile all Future Land Use Plan categories, including their range of permitted uses and intensity of uses consistent with County land development regulations.

ICE POLICY 1.3.5

The County shall maintain formal agreements with the Towns of Orange Park and Penney Farms concerning maintenance of roadways.

ICE POLICY 1.3.6

The County shall maintain mutual aid agreements with 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.

ICE POLICY 1.3.7

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

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.

ICE POLICY 1.3.9

Crime control shall be addressed efficiently through coordinated efforts of the County, Sheriff's Office, local governments, and other agencies.

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.

ICE POLICY 1.3.11

When a campus of the State University System is located within the County's jurisdiction, the County shall coordinate planning efforts with the institution and review the campus master plan for its potential effect on the Comprehensive Plan and community facilities and services.

ICE POLICY 1.3.12

The County shall work with its municipalities and adjacent local governments as appropriate to identify potential areas of annexation and to identify and implement joint planning areas.

Definitions

Certified Local Government is a municipal or county government which has made historic preservation a public policy through the passage of a historic preservation ordinance. Participation in the CLG program allows local governments to partner with other CLGs to share preservation ideas and experiences, as well as the opportunity to compete for CLG grants.

COACC Council on Aging Clay County

Development the carrying out of any building activities or mining operation or the making of any material change in the use or appearance of any structure or land and/or the dividing of land into three or more parcels.

FAA Federal Aviation Authority

FDOT Florida Department of Transportation

Interlocal Agreement for Coordinated Planning, Public Educational Facility Siting and Review and School Concurrency in Clay County the interlocal agreement between the County, non-exempt municipalities, and the School District, pursuant to Section 163.31777, F.S. which establishes standards and procedures for a coordinated, uniform Public School Concurrency program throughout Clay County and which coordinates the provision of Level of Service Standards for Public School Facilities.

JTA Jacksonville Transportation Authority

Level of Service (LOS) means an indicator of the extent or degree of service provided by, or proposed to be provided by, a facility based on and related to the operational characteristics of the facility. Level of service shall indicate the capacity per unit of demand for each public facility.

NEFRC Northeast Florida Regional Council

Public facilities mean major capital improvements, including transportation, sanitary sewer, solid waste, drainage, potable water, educational, parks and recreational facilities.

TPO North Florida Transportation Planning Organization (aka MPO)

HISTORIC PRESERVATION ELEMENT SUPPORT DOCUMENT

Data, Inventory & Analysis

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A. Introduction

The fundamental purpose of historic preservation is to prevent the destruction of historic resources that are worthy of protection. Over the past century, the nation as a whole has witnessed the destruction and deterioration of historic structures in cities and smaller communities alike. More recently, the importance of these structures has been recognized by federal, state and local governments as well as the public. Increased awareness has encouraged change in preservation efforts and methods. Just thirty years ago, communities focused on preserving individual structures associated with prominent persons or great events. Today, historic neighborhoods and downtown districts are the objects of preservation efforts. Historic preservation is an agent for renewal because it brings neighborhoods together, improves property values and instills pride in communities. The historic preservation plan focuses community effort on preserving historic resources that are recognized for their economic, historical, or architectural value, and also defines the role of government in the preservation process. Preservation efforts must enlist the cooperation of the entire community, including planning administrators, officials, and residents, to succeed. The goals, objectives, and policies constitute an agreement within the community regarding the value of historic resources and their respective protections. Residents are more likely to invest in their community if they are assured treasured structures will be protected. The historic preservation plan should also encourage individual residents to help protect the historic resources in their community.

Purpose of Report

Clay County's Historic Preservation Element is designed to protect the historic resources within its jurisdiction against adverse impact and to promote awareness among citizens and residents of the benefits of preserving such resources. The element is furthermore intended to fulfill the County's responsibility under the provisions of Chapter 163 Florida Statutes, 1986, which stated:

"It is the intent of this act that adopted comprehensive plans shall have legal status set out in this act and that no public or private development shall be permitted except in conformity with comprehensive plans, or element or portions thereof, prepared and adopted in conformity with this act."¹

Consistency

Administrative rules governing the preparation of comprehensive plans require that optional elements display consistency with the relevant goals and policies of the State Comprehensive Plan and the appropriate regional policy plan. The optional element must also be consistent with the other elements included in the comprehensive plan to which it belongs. Accordingly, the goals, objectives and policies enumerated in this element must be consistent with those enumerated in those elements of Clay County's Comprehensive Plan and with state and federal policies.²

¹The Florida Legislature. November 1, 2007, <http://www.leg.state.fl.us/statutes/index.cfm?App_mode=Display_Statute&Search_String=&URL=Ch0163/SEC3161.HTM&Title=-%3E2007-%3ECh0163-%3ESection%203161>

²Clay County 2015 Comprehensive Plan.

B. Existing Preservation Conditions

Brief History of Preservation in the United States

Federal historic preservation legislation dates back to 1906 with Congressional approval of the Antiquities Act, levying penalties for damaging or destroying historic or prehistoric sites located on public lands. The Act also authorized the President to protect appropriate federal landmarks.³

The Historic American Building Survey (HABS) was authorized by President Roosevelt in 1933. The purpose of the survey was to provide employment opportunities to architects during the Depression. In 1934 the American Institute of Architects agreed to perform the inventory of historic structures in the United States. Today, over one half of the over 35,000 structures surveyed have been demolished.⁴

The 1935 Historic Sites Act authorized the Secretary of the Interior to initiate a survey of nationally important sites. This Act constituted the first declaration of a national preservation policy and established the National Register of Historic Places, a list of culturally significant buildings and sites in the United States.⁵

The 1966 National Historic Preservation Act required all historical parks be listed on the National Register of Historic Places, created a Federal Advisory Council on Historic Preservation and required the State Historic Preservation Officer to review all federally funded projects that effect historic sites in their respective states.

Amendments to the 1966 National Historic Preservation Act approved by Congress in 1980 encouraged the strengthening of local legislation for the designation and protection of historic resources. Many local governments formulated similar legislation before 1980 but came under legal attack, particularly before the 1978 Supreme Court decision in the case of Penn Central Transportation versus the City of New York. This decision upheld the constitutionality of local governments employing landmarks laws to protect historic structures from demolition despite economic losses for the property owner.⁶

Historic Preservation in Florida

Florida has emerged in recent years as a national leader among states in adopting historic preservation legislation, funding programs, and organizing public and private preservation activities.⁷ The Florida Archives and History Act of 1967 (Chapter 267, Florida Statutes) is the principal piece of historic preservation legislation in the state and is recognized as one of the strongest such laws in the country. It defines the authority and responsibility of the Florida Department of State to protect historic resources.⁸

³ Charlotte R. Bell, Adina W. Kanefield, Javier Marqués. *Federal Historic Preservation Case Law, 1966-1996 and 1996-2000*. October 22, 2007, <<http://www.achp.gov/book/sectionI.html>>

⁴ *The Library of Congress*. November 1, 2007, <http://memory.loc.gov/ammem/collections/habs_haer/>

⁵ Charlotte R. Bell, Adina W. Kanefield, Javier Marqués. *Federal Historic Preservation Case Law, 1966-1996 and 1996-2000*. October 22, 2007, <<http://www.achp.gov/book/sectionI.html>>

⁶ 2015 Clay County Comprehensive Plan.

⁷ 2015 Clay County Comprehensive Plan.

⁸ *State Library and Archives of Florida*. November 14, 2007, <http://dlis.dos.state.fl.us/index_researchers.cfm>

Florida's 1975 Local Government Comprehensive Planning Act (LGCPA) laid the foundation for local preservation planning in the state. The act listed mandatory elements for inclusion in the general plans, and also includes a "historic preservation and scenic" element. The 1985 LGCPA Act amended a portion of the 1975 legislation to require coastal communities to address the preservation of archaeological and historic resources in their planning efforts. Although communities can fulfill the requirement by addressing the issue of preservation in each of the mandatory elements, the preparation of a separate element is the most effective way to comply with the statutory directive. This legislation requires land use maps to identify historic district boundaries, designate historically significant properties meriting protection and to identify within the housing element historically significant buildings for the purpose of conservation, rehabilitation or replacement.

Historic Preservation in Clay County

Historic preservation efforts in Clay County began in 1959 with the formation of the Clay County Historical Commission by the Board of Clay County Commissioners. This Commission's purpose was to collect and preserve any and/or all aspects of our County's unique and rich heritage for the benefit of future generations. The Historical Commission has also educated the public about Clay County history through two publications. *Parade of Memories* and *Who's Who Politically Speaking* provide descriptions of the early development of Clay County and a listing of its elected and appointed officials during that period.⁹ Since the formation of the Historical Commission, other organizations have developed with similar educational objectives. In October 1966, a group of citizens worked collectively to create the Clay County Historical Society, Incorporated. The purpose of this organization is to bring together individuals who share a common interest in history, especially the history of Clay County and Florida.

The Historical Society successfully achieved their primary goal with the establishment of the Clay County Historical Museum in 1975 at the Old Clay County Courthouse. This facility displays many artifacts, papers, pamphlets, books, photographs, illustrations and articles about virtually all aspects of Clay County's history and development. These items have been loaned or donated to the Society by private citizens for the benefit of residents and visitors. The Society is also responsible for opening a full size caboose and an operational Train Depot at the site to display many artifacts depicting the early days of railroading in Florida. It is a useful educational tool.¹⁰

Ordinance 2011-5 merged the Clay County Historic Preservation Board with the Historic Commission and updated other provisions in Article 12-7 of the Land Development Regulations.

Three other local groups have organized to promote preservation and restoration of individual historic structures and districts in their respective communities. In 1987, a local group of citizens in historic Middleburg organized the Main Street Preservation Society. This organization was successful in obtaining a matching grant from the Florida Department of State to conduct the first Historic Sites Survey of their community and in Clay County. The documentation from the survey was used in part for the application to the National Register of Historic Places for the Middleburg Historic District. This organization has been actively involved in promoting the local history of Middleburg through co-sponsorship of historic festivals.

⁹ Clay County 2015 Comprehensive Plan.

¹⁰ Clay County 2015 Comprehensive Plan.

In 1988 the Green Cove Springs Preservation Society formed with similar aspirations as the Main Street Preservation Society. This organization, like its Middleburg counterpart, actively promotes the preservation and reuse of historic sites in Green Cove Springs. The Society has successfully sponsored three Candlelight Tours of Homes during the Christmas Season and contributed \$1,000.00 to the City of Green Cove Springs to update the Historic Preservation Element of the Comprehensive Plan. The Society is currently interested in serving as a historical resource, saving structures that will potentially be demolished and lastly, encouraging the restoration of the brick streets in historic Green Cove Springs.

The City of Green Cove Springs has also displayed a high degree of interest in preservation activities. The City has successfully obtained grant funding for a Historic Sites Survey, National Register Nomination of a Historic District and updating of the Historic Preservation Element of its Growth Management Plan.¹¹

Historical Society of Orange Park was founded in 2003. Its mission is to preserve and advance an interest in the history of our area. The first project was to preserve the Clarke House, which has expanded to a number of architectural preservation projects, education and a historical focus for many community events.¹²

C. Comprehensive Survey

Before employing protections for historic resources, historically significant properties need to be determined and evaluated. Preservation of a community's resources logically begins with their identification through architectural and archaeological survey to locate, describe and record notable resources. A professionally directed comprehensive survey provides information about historic resources that permits authorities and property owners to make informed decisions regarding the significance and protections required for those resources. Surveys identify buildings, sites, districts, structures, and objects that should be nominated to the National Register and receive its protection, locates properties that deserve consideration in the local planning process, provides planners with a data base to monitor new development, establishes priorities for conservation and restoration, determines potential local historic districts, provides the basis for applying legal and financial tools for preservation, and permits participation in federal programs and planning. Equally important, a competent survey provides the community with a permanent record of its historic resources.

Florida Master Site File:

The Florida Master Site File is the state's clearinghouse for information on archaeological sites, historical structures, and field surveys. This system of paper and computer files is administered by the Division of Historical Resources, a part of the Florida Department of State. Sites and structures listed on the Master Site File are not necessarily historically significant but simply meet the minimum age requirement of fifty years old.

¹¹ Clay County 2015 Comprehensive Plan.

¹² https://www.facebook.com/pg/Historical-Society-of-Orange-Park-183238288378583/about/?ref=page_internal

Architectural Survey:

Architectural survey is the process of identifying and recording buildings in a prescribed geographic area that qualify for listing on the Florida Master Site File. The survey employs historical research and oral information to identify the buildings eligible for recording. A historical description, photographs and location map are recorded in the survey. The Division of Historical Resources requires that surveys completed under its financial or administrative auspices, including projects funded through a survey grant, contain a report describing the historical development and architectural analysis of the survey area.

Archaeological Survey:

An archaeological survey seeks to locate, identify, and assess the significance of prehistoric and historic resources contained below the surface. Subsurface testing combined with environmental and ecological studies is used to locate sites. Since thorough testing for archaeological sites in a large geographic area, such as Clay County, would prove manifestly difficult and costly, a predictive model for site location is often established on the basis of studies described above. This information is provided to planners and local authorities as a means of avoiding destruction of resources in the course of land altering activity. The information is useful only where the local authority introduces regulations and procedures into the permitting process that ensure appropriate parties are advised of potentially destructive activity and guidelines are established to be followed when such determinations are made.

Financial assistance and professional advice in undertaking surveys is provided by the Division of Historical Resources of the Florida Department of State. The department also requires professional qualifications for the people performing surveys.

The National Register of Historic Places:

Surveys provide information upon which a determination can be made regarding the eligibility of individual properties for recording on the National Register of Historic Places, a list of culturally significant properties maintained by the U.S. Department of Interior. The National Register program is often misunderstood. It does not restrict private use of a property; meaning, listing does not come packaged with a set of architectural or land use controls.

Legally, the National Register only protects properties against the consequences of adverse federal activity. Listing on the National Register also provides financial incentives, under the federal tax code, for improving income-producing structures.

Nominations can be made by any person; however, owner consent to the nomination is required. Within proposed historic districts, a majority of property owners must express disapproval of the nomination to prevent its listing. Properties may be determined eligible for listing by the Keeper of the National Register despite owner objection, though they are not listed. Properties determined eligible are afforded a measure of protection under federal and state law.¹²

¹² *National Register of Historic Places*. October 22, 2007, <<http://www.nps.gov/history/nr/listing.htm>>

D. Preservation Measures and Incentives

A variety of legal, financial, and educational measures and incentives can be used to preserve historic resources. They include programs to identify resources, land use controls, financial incentives, and education efforts to inform residents about the advantages of preservation. This section provides a description of those measures, and a summary of their potential for use in Clay County.

Legal Measures and Financial Incentives (Federal)

The federal government's participation in historic preservation is a relatively recent phenomenon. The Antiquities Act of 1906 was the first Congressional act that provided protection of prehistoric and historic ruins on federal lands.¹³ The Historic Sites Act of 1935 ensured the preservation for public use of historic sites, buildings, and objects.¹⁴

The National Historic Preservation Act of 1966 has historically constituted the most significant piece of federal preservation legislation. The Act authorized the Secretary of the Interior to expand the National Register to include sites and districts of local significance, established a grant program to assist the states in their historic preservation activities, and afford some protection to historic sites from federally sponsored destruction through the National Register. These protections and programs principally accomplished through the provisions of Section 106 of the Act.¹⁵

Section 106

This section of the 1966 National Historic Preservation Act requires federal agencies to permit the Advisory Council on Historic Preservation, a federal agency created under the Act, an opportunity to review and comment upon threats to historic resources posed by federal activity.¹⁶ Executive Order 11593, issued by President Nixon in 1971 and translated into law under a 1980 Act of Congress, requires federal agencies to survey and nominate eligible properties that are under their jurisdiction and control to the National Register.¹⁷

NEPA:

An equally important federal law is the National Environmental Protection Act of 1969 (NEPA), which requires federal agencies to prepare an environmental impact statement for activity that affects the human environment. Since the environment is defined to include cultural resources, the impact statements must include the comments from the Advisory Council on Historic Preservation and fulfill the requirements of Section 106.¹⁸

13 Federal Historic Preservation Laws: The Official Compilation of U.S. Cultural Heritage Statutes 2006 Edition. National Park Service U.S. Department of the Interior 5-6.

14 Ibid 12-19.

15 Ibid 34 -98.

16 Ibid 59.

17 Federal Historic Preservation Case Law 1966 – 1996 & 1996 -2000. October 22, 2007, <http://www.achp.gov/book/sectionVI.html>>

18 Ibid.

Federal Funding Programs

Federal funds are available for historic preservation activities in a variety of government programs and activities. Although few grants are strictly preservation related, federal statutes and regulations contain provisions for historic preservation funding. The most conspicuous source, however, is the annual appropriation to the states authorized under the 1966 National Historic Preservation Act. Ten percent of those funds are only available for Certified Local Governments. A particularly rich source of funding has been through the programs administered by the U.S. Department of Housing and Urban Development (HUD), which offers support for rehabilitation of older housing and downtown redevelopment. The Departments of Agriculture, Commerce, Interior, and Defense are among the federal agencies administering programs which generate preservation activity.

Tax Incentives

For more than three decades, the federal government has encouraged the rehabilitation of historic buildings through a tax incentive program. Beginning with the 1976 Tax Reform Act and the 1978 Revenue Act, federal tax law introduced provisions that favored the retention of older buildings. In 1981, Congress further encouraged preservation with a change in the tax code that allowed taxpayers a credit equal to twenty-five percent (25%) of qualified expenditures for certified and substantial rehabilitation of qualified buildings. The 1986 Tax Reform Act retained the credits, though at a reduced rate. Current law (2016) provides a twenty percent (20%) credit upon the expenses incurred in rehabilitating an income producing certified historic building and a ten percent credit for non-historic buildings placed in service before 1936.

The federal government also encourages preservation through easements by providing donors with federal income, estate and gift tax credits. A preservation easement is a charitable contribution by a landowner to an approved easement holding organization for the purpose of the continued preservation of the historic site and/or structure. The donor retains ownership of the historic site, but transmits specific development and alteration rights to an easement holding organization.

A further provision in the federal tax code favoring historic preservation is one that exempts the interest on Industrial Revenue Bonds employed for historic preservation purposes from federal taxation under Section 103(b) of the Internal Revenue Code of 1954. While each state has a precise limitation upon the amount that can be exempted, the quota is generous. This federal incentive for historic preservation will probably remain substantial.¹⁹

Low-Income Housing Credits

The 1986 Act provides for special relief for investors in certain low-income housing projects.

Community Development Block Grant Funds

The federal Community Development Block Grant program permits the use of funds distributed as community block grants for historic preservation purposes, such as survey of historic resources.

Other Federally-Assisted Measures

In addition to tax incentives and funded support programs, the federal codes are replete with incentives to encourage historic preservation. Such assistance often comes in the form of relief

19 2015 Clay County Comprehensive Plan

from rules and requirements that normally apply to non-historic buildings or property. For Example, in coastal areas, where specific building elevations are required for federal insurance purposes, exemptions may be provided at the discretion of the local government in its flood control ordinance to qualified historic structures.

National Private Funds

Various national organizations, led by the National Trust for Historic Preservation, offer grants and loans for historic preservation purposes. The National Trust supports the rehabilitation of inner-city historic districts through grants for planning and administration and low-interest loans for rehabilitation. A "Critical Issues Fund" maintained by the Trust offers grants to support research and projects that address urgent, community wide preservation problems.

Legal Measures and Financial Incentives (State)

A variety of legal and financial incentives and instruments created under state and local statute, law and regulation are also available for use by government and citizens to assist preservation efforts. In many cases, these are familiar devices in real estate and tax law.

Preservation Easements:

A preservation easement is a voluntary restriction placed on a property by the owner that ensures the continued preservation of the structure and/or site by subsequent owners. The easement is usually placed with a non-profit organization that is qualified to maintain it over a period of time. Tax advantages are available for some easements. Federal law permits, for example, the donation of a façade easement for the purpose of preserving the exterior integrity of a qualified historic building. Conservation easements are used to preserve archaeological sites or open spaces.²⁰

Restrictive Covenants

Though it is created differently, a restrictive covenant has the same effect as a preservation easement. Restrictive covenants prohibit particular uses and modifications of a property after ownership is transferred. A covenant attached to a deed, for example, might prohibit subdivision of the property or demolition of a structure.

The Florida conservation easements statute explicitly recognizes that an easement may be created by a restrictive covenant. However, if there is a preservation organization willing to accept and enforce an easement, there would not be any advantage to also having a restrictive covenant. There is less assurance of protection and no tax advantages with a restrictive covenant compared to an easement. When establishing a covenant, the Florida conservation easements statute, Section 704.06, Florida Statutes (1985) should be consulted for assurances that it can be enforced.

Transfer of Development Rights

A transfer of development rights (TDR) allows a property owner to transfer the right to develop a property to another parcel. This device is similar to an easement because it involves the acquisition or transfer of certain property rights. This program retains the donor parcel in its existing state, while the receiving parcel may be developed more intensely than would otherwise

²⁰ *Preservation Easements: An Important Legal Tool for the Preservation of Historic Places*. November 6, 2007, <<http://www.nationaltrust.org/legal/easements/index.html>>

be allowed. Local government can employ this device to protect environmentally sensitive areas, agricultural lands and historic properties.

Legislative Initiatives

The Florida Legislature has enacted a number of statutes to stimulate redevelopment of areas defined variously as blighted, slums, or enterprise zones. Since these areas are often rich in older or historic building stock, the statutes provide a major tool for preservation and rehabilitation. State incentives and programs that encourage revitalization of areas defined as enterprise zones are:

1. The Community Contribution Tax Credit is intended to encourage private corporations and insurance companies to participate in revitalization projects undertaken by public redevelopment organizations in enterprise zones. This credit explicitly includes historic preservation districts as both eligible sponsors and eligible locations for such projects. This tax credit actually allows a corporation or insurance company a 55 cent refund on Florida Taxes for each dollar contributed up to a total contribution of \$400,000, assuming the credit does not exceed the state tax liability.
2. Tax increment financing provides for use of the tax upon an increased valuation of an improved property to amortize the cost of bonds issued to finance the improvement. Tax increment financing can effectively pay for redevelopment by requiring that the additional ad valorem taxes generated by the redeveloped area be placed in a special redevelopment trust fund and used to repay bondholders who provided funding at the beginning of the project.
3. Property tax deferments to property owners in historic districts.
4. Job creation incentive credits.
5. Economic revitalization tax credits.
6. Community development corporation support and assistance programs.
7. Sales tax exemption for building materials used in rehabilitation of real property in enterprise zones.
8. Sales tax exemption for electrical energy used in enterprise zones.
9. Credit against sales tax for job creation in enterprise zones.
10. State and local incentives and programs encourage revitalization not only in blighted areas, but also in historic properties that include reduced assessment and transfer of development rights provisions listed above and, most notably, Industrial Revenue Bonds.

While many of the incentives and programs listed above appear directed toward areas defined as blighted, preservationists cannot overlook the economic encouragement they offer for the rehabilitation of historic structures and districts that have been neglected. Moreover, there are significant incentives which are available to historic properties and districts without regard to blight or urban decay. These prominently include the Community Contribution Tax Credit and Tax Increment Financing.

Direct State Legislative Support

The State of Florida became increasingly active in historic preservation during the 1980's. The Florida Department of State is responsible for dispersing state preservation dollars. It provides funding in the areas of acquisition and development, survey and registration and preservation education. Funding is primarily sought for surveys of architectural and archaeological resources, preparation of National Register nominations, completion of a Historic Preservation Element for the Comprehensive Plan, preparation of a historic preservation ordinance and accompanying guidelines, acquisition of culturally significant properties and rehabilitation of historic structures.

Eligible recipients for such grants include county and municipal governments and registered nonprofit organizations. The grants are administered by the Division of Historical Resources of the Florida Department of State.²¹

Other Sources and Programs

Private funding sources for historic preservation include commercial banks, private lenders, insurance companies, and so forth. Many state, local and national foundations and non-profit organizations also support preservation efforts.

Revolving Funds

Revolving funds have become a familiar instrument in historic preservation. They permit preservation organizations to purchase threatened historic properties or obtain an option to purchase and then the funds are used for repairs. After the repairs are complete, these organizations sell the property with restrictive covenants that will assure its preservation. The money obtained from the sale is returned to the fund for another preservation project. Loans may also be made from the fund for private preservation projects.

Marker Program

Bronze marker signs on roadsides alert the public that historic resources are nearby. The Florida Historical Marker Program recognizes historic resources, persons and events that are significant in the areas of architecture, archaeology, Florida history and traditional culture by promoting the placing of historic markers and plaques at sites of historical and visual interest to visitors. The purpose of the program is to increase public awareness of the rich cultural heritage of the state and to enhance the enjoyment of historic sites in Florida by its citizens and tourists.

Plaque Program

Plaques and certificates are awarded to property owners that meet specific criteria in their preservation efforts. These awards are often employed to encourage preservation by recognizing outstanding efforts as well as to identify important sites and buildings. In undertaking such a program, directors must understand the absolute necessity for establishing written and well defined criteria to select award recipients. The awards should be made by a qualified committee based upon established criteria. In the absence of such steps, the awards will become meaningless or worse, controversial and possibly injure the preservation efforts in the community.

²¹ *Clay County 2015 Comprehensive Plan.*

Informational Material

Local governments, Chamber of Commerce, private corporations and institutions, and local historic preservation organizations should promote the distribution of historic resources. Maps, brochures, and other materials designed to acquaint visitors and residents with the county should be produced and freely distributed. Studies completed by the National Trust for Historic Preservation have indicated that historic sites occupy a high place of preference among tourists. Local governments, cultural organizations, and private business find in many instances that advertising historical points of interest to be economically advantageous.²²

Municipal Actions

Virtually all of the programs and incentives outlined above that are useful in the preservation process should be considered for inclusion in the Historical Element. There is additionally a set of specific administrative actions which the county should pursue. Some of the measures listed below are discussed elsewhere and are included here as a summary list.

Building Code

The physical specifications for new or rehabilitated structures in Clay County are governed by the Building Code. Like most counties, Clay County has adopted the Standard Building Code, which gives the building official discretion to provide exemptions for historic structures to many provisions that would, if required, jeopardize the integrity of the structure.

Zoning Code

The introduction of discordant elements to a historic setting may destroy the integrity of existing historic resources. Historic architectural controls are a special kind of zoning and should be considered a reasonable regulation of property development applied in the interest of the community. Zoning is the most common historic preservation tool, but it also presents significant dangers to historic resources if it is wrongfully applied. The introduction of commercial buildings in a residential neighborhood, for example, may lead to the neighborhood's destruction.

The term zoning applies to land use controls that can exert a positive or negative effect on historic resources. Lot size, density, permitted use, occupancy, and architectural standards are all examples of land use controls which are regulated through zoning and have an impact on historic resources. A historic preservation ordinance, which may include architectural standards for review, is generally considered a zoning issue and defended as such when challenged.

County Land Management

Clay County owns and maintains property that contains significant historic resources, including buildings, archaeological materials, landscape features, and other objects. These sites should be recognized and treated with due regard for their historical significance and appearance. County properties that may harbor archaeological or architectural sites include highway right-of-ways, parks, and recreation areas.

²² *Cultural Heritage Tourism*. November 8, 2007, <<http://www.culturalheritagetourism.org>>

Certified Local Government (CLG) Program

Since its establishment by Congress in 1966, the National Historic Preservation Program has operated as a decentralized partnership between the federal government and the states. The federal government set up a program of identification, evaluation, and protection of historic properties based on the National Register of Historic Places eligibility criteria. The program is carried out by the states, under the direction of the National Park Service. To support their efforts, participating states receive grants annually from the Federal Historic Preservation Trust Fund. Funds are normally used to support the staff of the State Historic Preservation Office and a portion of the funds must be redistributed in the form of sub-grants to CLG's for survey, planning and other activities.

The success of the relationship between the states and federal government led Congress to provide direct participation to qualified local governments. The National Historic Preservation Act Amendments of 1980 (P.L. 96-515) provide the legal basis for the new federal-state-local preservation partnership commonly referred to as the Certified Local Government Program. The amendments directed the State Historic Preservation Officer and the Secretary of the Interior to establish procedures for certification of local governments. The Certified Local Government Program permits the states to delegate limited responsibilities to local governments that meet specific qualifications for certification and provide limited grant-in-aid funding to assist them in that process.

E. Historic Preservation Organizations and Agencies

Historic Preservation involves a broad coalition of supporters, including numerous agencies from all levels of government, residents, professional groups, and public and private organizations. The implementation of an effective historic preservation program in Clay County requires officials, administrators, and residents to be aware of the responsibilities and functions of the organizations involved in the historic preservation process. For example, County administrators or local residents undertaking activities that are regulated by the federal or state government should understand the requirements for compliance. The following section is an educational aid to understand the organizations and agencies involved in the historic preservation.

Federal Government

The U.S. Department of Interior is the federal agency responsible for implementing the historic preservation program. The program includes administration of nationally significant sites, maintenance of the National Register of Historic Places, conducting Historic American Building Survey (HABS) and ancillary programs, administering grants to states for historic preservation activities, development of guidelines for survey, establishment of rehabilitation standards and review of applications for tax certifications for historic buildings, and assistance and advice regarding preservation issues. The State Historic Preservation Office, a part of the Florida Department of State, is the responsible state agency for implementing the federal program.

Section 106 of the National Historic Preservation Act (see Preservation Measures) requires federal agencies to consider the effects of their actions, or actions they may assist, permit, or license, may have on historic properties. Also, The Advisory Council on Historic Preservation (ACHP) must be given a "reasonable opportunity to comment" on activity that may affect significant historic resources. Projects may include construction of highways and wastewater

treatment plants, issuance of permits by the Army Corps of Engineers for wetlands dredge and fill projects, and redevelopment projects funded through a Community Development Block Grant (CDBG), among others.

Section 106 applies to properties that have been listed in the National Register of Historic Places, properties that have been determined eligible for inclusion in the National Register, and properties that may be eligible but have not been evaluated. Compliance by the County or its residents with federal historic preservation laws and regulations must be coordinated through the State Historic Preservation Officer.

State of Florida

The state's responsibility for protecting and preserving historic resources is exercised through a variety of departments and agencies but principally through the Department of State's Division of Historical Resources. The director of the division is designated as the State Historic Preservation Officer (SHPO) and thus coordinates the federal program in Florida as well as directs the administration of the state program.

This Division, which derives its authority from Chapter 267 of the Florida Statutes, functions as the state's chief manager of historic properties, and is charged with the following responsibilities:

1. Cooperate with federal and state agencies, local governments, and private organizations and individuals to direct and conduct a comprehensive statewide survey of historic resources and to maintain an inventory of such resources.
2. Develop a comprehensive statewide preservation plan.
3. Identify and nominate eligible properties to the National Register of Historic Places and otherwise administer applications for listing historic properties in the National Register.
4. Cooperate with federal and state agencies, local governments, and organizations and individuals to ensure that historic resources are taken into consideration at all levels of planning and development.
5. Advise and assist, as appropriate, federal and state agencies and local governments in carrying out their historic preservation responsibilities and programs.
6. Provide public information, education, and technical assistance relating to historic preservation programs.
7. Cooperate with local government and organizations and individuals in the development of local historical preservation programs, including the Main Street America Program of the National Trust for Historic Preservation, or any similar programs that may be developed by the division.
8. Carry out on behalf of the state the programs of the National Historic Preservation Act of 1966, as amended, and to establish, maintain, and administer a state historic preservation program meeting the requirements of an approved program and fulfilling the responsibilities of state historic preservation programs as provided in subsection 101(b) of that act.

9. Take such other actions necessary or appropriate to locate, acquire, protect, preserve, operate, interpret, and promote the location, acquisition, protection, preservation, operation, and interpretation of historic resources to foster and appreciation of Florida history and culture. Prior to the acquisition, preservation, interpretation, or operation of a historic property by a state agency, the division shall be provided a reasonable opportunity to review and comment on the proposed undertaking and shall determine that there exists historic authenticity and a feasible means of providing for the preservation, interpretation and operation of such property. Expenditures by the division to protect or preserve historical properties leased by the division for the Board of Trustees of the Internal Improvement Trust Fund may be exempt from the competitive bid requirements of chapters 255 and 287.
10. Cooperate and coordinate with the Division of Recreation and Parks of the Department of Environmental Protection in the operation and management of historic properties or resources subject to the Division of Historical Resources.
11. Establish professional standards for the preservation, exclusive of acquisition, of historic resources in state ownership or control.
12. Establish guidelines for state agency under subsection (2).
13. Acquire, maintain, preserve, interpret, exhibit, and make available for study objects which have intrinsic historical or archaeological value relating to the history, government, or culture of the state. Such objects may include tangible personal property of historical or archaeological value. Objects acquired under this paragraph belong to the state, and title to such objects is vested in the division.²³

Chapter 267 also spells out the responsibilities of Executive Branch's site agencies in the preservation process. The agencies are required by statute to locate, inventory, and evaluate historic properties under their ownership or control. They must also notify the Division of Historical Resources of any projects that may impact historic sites and allow the Division opportunity to comment. The Department of Economic Opportunity plays a major role in the preservation process through its review of local government comprehensive plan amendments and administration of the Areas of Critical State Concern Program.

The Division of Historical Resources administers the federal and state funds for historic preservation activities. These funds include a portion of the federal allocation for historic preservation distributed to each state on an annual basis as well as monies contributed to the Florida Historic Preservation Trust Fund, whose principal source is legislative appropriation. In this function and others, the division is assisted by a twelve-member Historic Preservation Advisory Council, whose members are appointed by the Secretary of State.

²³ *Florida Statutes Chapter 267*. November 9, 2007,
http://www.leg.state.fl.us/statutes/index.cfm?App_mode=Display_Statute&Search_String=&URL=Ch0267/SEC061.HTM&Title=->2000->Ch0267->Section%20061#0267.061

Other preservation programs administered by the division include the Florida Main Street program, the Certified Local Government (CLG) program (see Preservation Measures), applications for federal tax credits for rehabilitation of historic properties, and the state marker program. The division also administers on behalf of state and federal governments the compliance review program, which oversees the application of historic preservation law and regulation in appropriate situations.

As part of the responsibilities enumerated above, the division maintains the Florida Master Site File (see Preservation Measures), a standardized list of historic resources found in the state. The division issues guidelines, financial assistance, and professional advice to local governments and nonprofit organizations that undertake surveys to locate, identify, and evaluate properties for inclusion in the list.

Clay County

The ultimate governmental responsibility for preserving the cultural heritage of Clay County rests with local government, which has the authority to regulate land use. The County has a number of preservation options that it can employ, including incentive and enforcement measures that are enumerated in the Preservation Measures section.

County departments and independent agencies of local government are normally exempt from the County's permitting requirements for private individuals and firms. The County may own property within historic districts or property that has historical and cultural value, and the County may make modifications to such property that would require permits if the property were privately owned. On a routine basis, as part of its general program to maintain streets, parks, buildings, sidewalks, and other spaces, the county engages in activity that may affect the physical character of historic areas.

County departments that may impact the physical character of historic resources include the Economic and Development Services, Recreation and Open Space, and Public Works. The review and approval of applications to engage in land altering activities and management of county properties and lands both present possible impacts on historic resources.

Equally important is the role of county agencies in drafting rules for administration, preparing regulations and codes, drafting ordinances, and preparing and adopting plans, particularly the Comprehensive Plan. Through instruments of law, regulation and administration, county governments can most effectively preserve historic resources.

Private Organizations (State and National)

There are numerous private organizations at the national, state, and local level involved in the historic preservation process. None, of course, exercises any legal responsibility for the protection of historic resources, unless the particular entity owns such property or is assigned applicable trusteeship under law. Private organizations nevertheless play a vital role in preserving historic resources by providing useful information and services, implementing preservation education programs, holding easements, restoring individual properties and lending financial assistance for preservation.

National Trust for Historic Preservation

Chartered by Congress in 1949, the National Trust is a quasi-public organization that provides assistance, advice, and some funding to private organizations for historic preservation activities. The National Trust produces educational and informational journals and technical publications for the benefit of preservationists. Particularly useful is Preservation News, the Trust's monthly newspaper, which provides national and regional coverage of significant preservation policy issues, and Forum Online, a professional research tool that allows preservationists to communicate ideas with the preservation community. The organization maintains a national headquarters in Washington D.C. and regional field offices.

F. Description of Historic Resources

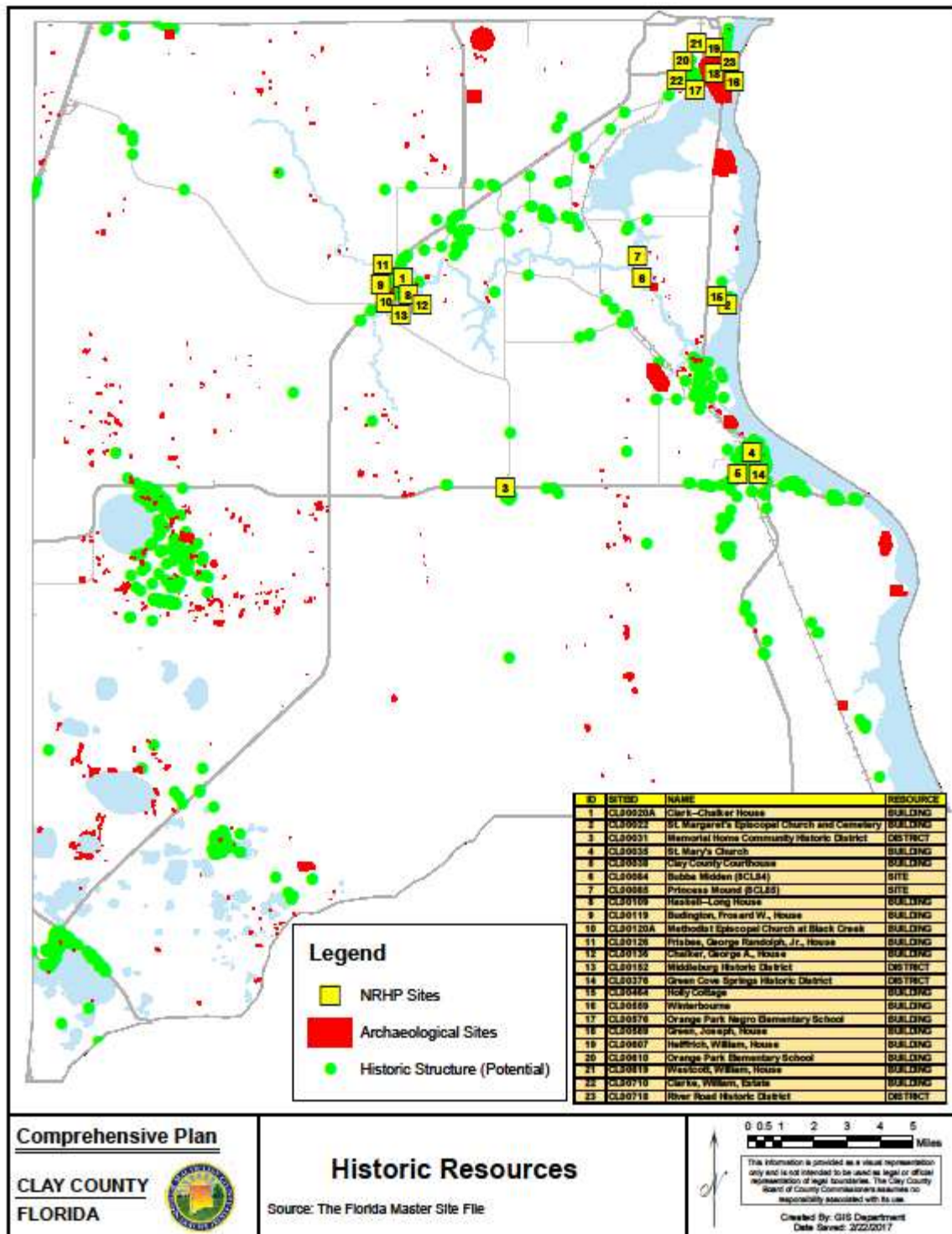
An inventory of existing surveys was utilized to determine the historic resources in the County. The Division of Historical Resources within the Florida Department of State maintains the Florida Master Site File, a statewide compilation of historically and archaeologically identified sites. One thousand one (1,001) structures have been identified in the County by the State at this time. Additionally, over three hundred archaeological sites have been identified. The County also has twenty-three (23) National Register sites as well as two (2) National Register Historic Districts in Middleburg and the City of Green Cove Springs. Of the twenty-three (23) historic sites, nine (9) are located in the County and thirteen (14) are located in the municipalities. These sites are identified on the Historic Resources Map in Figure 1.

Table 1 – Clay County National Register Sites

	NRHP Registered Individual Buildings	Planning District / Municipality
1	Clark-Chalker House	Middleburg / Clay Hill
2	St. Margaret's Episcopal Church and Cemetery	Fleming Island
3	Memorial Home Community Historic District	Town of Penney Farms
4	St. Mary's Church	City of Green Cove Springs
5	Clay County Courthouse	City of Green Cove Springs
6	Bubba Midden (8CL84)	Fleming Island
7	Princess Mound (8CL85)	City of Green Cove Springs
8	Haskell-Long House	Middleburg / Clay Hill
9	Budington, Frosard W., House	Middleburg / Clay Hill
10	Methodist Episcopal Church at Black Creek	Middleburg / Clay Hill
11	Frisbee, George Randolph, Jr., House	Middleburg / Clay Hill
12	Chalker, George A., House	Middleburg / Clay Hill
13	Middleburg Historic District	Middleburg / Clay Hill
14	Green Cove Springs Historic District	City of Green Cove Springs
15	Winterbourne	Town of Orange Park
16	Orange Park Negro Elementary School	Town of Orange Park
17	Green, Joseph, House	Town of Orange Park
18	Helffrich, William, House	Town of Orange Park
19	Orange Park Elementary School	Town of Orange Park
20	Westcott, William, House	Town of Orange Park
21	Clarke, William, Estate	Town of Orange Park
22	River Road Historic District	Town of Orange Park
23	Holly Cottage	City of Green Cove Springs Fleming Island

Source: The Florida Master Site File

Figure 1 – Historic Resources Map



G. Analysis

The County owned National Register listed facilities have been rehabilitated. The Historic Courthouse is in need of additional rehabilitation. Research is currently underway with regard to grant opportunities.

A State historic marker was erected by the Clay County Historic Preservation Board at Camp Chowenwaw Park, in May 2016, at the Big Cabin. The research that was done by the Historic Preservation Board to justify the State marker is indicative of the eligibility of Big Cabin for National Register Listing.

The County has all the land development regulations in place, Section 12-7 of the County Land Development Code, to provide a greater degree of protection for the historic structures located in unincorporated Clay County, than is afforded simply by National Register listing. The implementation of local historic districts would provide the strongest protection for these resources. When a property owner is confident that the investments they make in historic rehabilitation will be replicated by surrounding historic property owners, historic rehabilitation is most likely to occur and be maintained over the years. These efforts have resulted in a pattern of higher property values and economic development in those places that implement such regulations fully.

H. 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 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 Historical 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 Historical 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 Historical 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 Historical 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 Historical Element objectives or policies that directly relate to or otherwise impact this issue.

I. Matrix for Evaluating Plan Policies

As part of the evaluation of the 2025 Comprehensive Plan's Historic Preservation 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?

Historical	Measurable Target	Defined Terms	Achieved	Major Issue	Statute Requires	Supports Others	Observations
HIS GOAL 1	Yes	No	Yes	No	No	No	
HIS OBJ 1.1	Yes	No	Yes	No	Yes	Yes	
HIS POLICY 1.1.1	Yes	No	Yes	No	Yes	Yes	
HIS POLICY 1.1.2	Yes	No	Yes	No	Yes	Yes	County GIS maintains the Master Site File Data Base.in cooperation with Planning Division.
HIS POLICY 1.1.3	Yes	No	No	No	No	Yes	
HIS POLICY 1.1.4	No	No	No	No	No	Yes	The County could place a link to the Florida Division of Historic Resources on its website.
HIS POLICY 1.1.5	Yes	No	No	No	No	No	The HPB should consider compiling a list.
HIS OBJ 1.2	Yes	No	Yes	No	Yes	Yes	The site file indicates many have been evaluated. However implementation of local historic districts would provide more protection of historic resources, then NR listing.
HIS POLICY 1.2.1	Yes	No		No	No	Yes	Amended in 2011.
HIS POLICY 1.2.2	Yes	No	Yes/No	No	No	Yes	
HIS OBJ 1.3	Yes	Yes	Ongoing	No	No	Yes	
HIS POLICY 1.3.1	Yes	Yes	Yes	No	No	Yes	
HIS POLICY 1.3.2	No	No	Yes	No	No	Yes	
HIS OBJ 1.4	No	Yes	Yes	No	No	Yes	Consider nomination of Camp Chowenwaw Big Cabin.
POLICY 1.4.1	Yes	Yes	Yes	No	No	Yes	
POLICY 1.4.2	No	No	No	No	No	Yes	
POLICY 1.4.3	Yes	Yes	----	No	No	Yes	National Register listings are available online from the National Park Service. Criteria also available online at the Florida Division of Historic Resources. Consider providing a link on our website to both.
POLICY 1.4.4	No	No	No	No	No	Yes	Consider Property Tax Incentive and bonus densities for appropriate rehabilitation/infill projects.
OBJ 1.5	Yes	Yes	Yes	No	No	Yes	Consider implementing a local historic district in Middleburg; and local designation of other individual sites.
POLICY 1.5.1	Yes	Yes	Yes	No	No	Yes	See Article 12, Clay County Land Development Code.
OBJ 1.6	Yes	Yes	Yes	No	No	Yes	
POLICY 1.6.1	No	Yes	Yes	No	No	Yes	
POLICY 1.6.2	No	No	Yes	No	No	Yes	
POLICY 1.6.3	Yes	No	Yes	No	No	Yes	Add definitions for the Secretary of the Interior standards.

J. Assessment of Changes to Florida Statutes

As part of the evaluation of the 2025 Comprehensive Plan's Historical Element, the County examined changes in state statutory requirements since 2009, the last update of the Comprehensive Plan. This is an optional element of the Comprehensive Plan and has not been affected by any state statutory revisions.

K. Conclusions and Proposed Revisions

The Comprehensive Plan is substantively up-to-date and the County has done a good job of implementing its Comprehensive Plan. Most necessary amendments are those as required by changes in State law, or to provide greater emphasis on issues of particular importance to Clay County.

- 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.
- Revise the name of the element
- Revise to reflect correct county department/division references
- Revise to reflect the change to Historic Preservation Board
- Revise the name of the element from Historical Element to Historic Preservation Element

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

Proposed Amendment to Element Title

Revise the title to reflect the intention to preserve the county's historical treasures

HISTORICAL PRESERVATION ELEMENT

Proposed Amendment to Policy 1.2 (HIS Policy 1.1.2)

County GIS maintains the Master Site File Data Base in cooperation with the Planning Division.

HIS POLICY 1.1.2

The Clay County Planning Department and Zoning Division, in cooperation with Geographic Information Services, shall continue to maintain Historic Resources Maps, a comprehensive listing of all archeological sites and historic building locations.

Proposed Amendment to Policy 1.3 (HIS Policy 1.1.3)

Ordinance 2011-5 created the Historic Preservation Board to replace the Historical Commission.

HIS POLICY 1.1.3

The County Historic Preservation Board will cooperate with the ~~Historical Commission~~ and other historical/preservation societies and organizations to establish a prioritized list of the top ten sites or objects of historical interest.

Proposed Amendment to Policy 1.5 (HIS Policy 1.1.5)

Updates department name to Economic and Development Services Department.

HIS POLICY 1.1.5

The County, in conjunction with other historical/preservation organizations, shall prepare a list of historical and geographical names significant to Clay County's heritage. The Public Works and Economic and Development Services Departments shall make the list available to all developers and interested parties as an aid in naming streets and subdivisions.

Proposed Amendment to Objective 3 (HIS Objective 1.3)

Ordinance 2011-5 created the Historic Preservation Board to replace the Historical Commission.

HIS OBJ 1.3 Clay County will assist the ~~Historical Commission~~ Historic Preservation Board and other historical organizations with planning grants, surveys and other public and private grants.

Proposed Amendment to Policy 1.4 (HIS Policy 1.4.1)

Revise name to Planning and Zoning Division, which is within the Economic and Development Services Department.

HIS POLICY 1.4.1

The Planning Department and Zoning Division will coordinate and assist the ~~Historical Commission~~ Historic Preservation Board in the preparation of a National Register of Historic Places Nomination Form as funds are available, to the Florida National Register Review Board for review as structures, districts and objects identified during the historical inventory are deemed eligible for nomination by qualified consultants or other historic preservation professionals.

EXHIBIT H

INTRODUCTION

PURPOSE AND INTENT OF THE HISTORIC PRESERVATION ELEMENT

The Historic Preservation Element provides the framework for the identification, designation and protection of historically significant sites, structures and objects. Numerous historic preservation organizations within Clay County provide a large base of support for the objectives and policies in this element.

The goals, objectives and policies listed below will be used by Clay County professional staff and decision-makers involved in historic preservation planning in Clay County. These decision-makers include government officials charged with some funding and resource designation decisions as well as various historic preservation organizations who educate the public concerning the protection of historically significant properties. The objectives and policies are intended to serve as a guide for both public and private decisions.

Further, the objectives and policies in this element as well as other elements of the Clay County Comprehensive Plan should be considered and viewed as a whole. No single objective or policy is intended to have precedence over another. Rather, they should provide an overall framework for the management of the County's resources and for meeting the needs of current and future residents and employees.

HIS GOAL 1

To identify, evaluate, preserve, recognize, promote and utilize the historical, architectural and archaeological resources significant to Clay County's past.

HIS OBJ 1.1

Maintain the inventory of the County's archaeological, architectural and historic resources associated with its past.

HIS POLICY 1.1.1

The County shall maintain and regularly update the automated database of historical resources in the County. The Historical Resource Inventory will contain all resources listed on the Florida Master Site File for unincorporated Clay County.

HIS POLICY 1.1.2

The Clay County Planning and Zoning Division, in cooperation with Geographic Information Services, shall continue to maintain Historic Resources Maps, a comprehensive listing of all archeological sites and historic building locations.

HIS POLICY 1.1.3

The County Historic Preservation Board will cooperate with the other historical/preservation societies and organizations to establish a prioritized list of the top ten sites or objects of historical interest.

HIS POLICY 1.1.4

The County shall make available to the public any information on historic preservation incentives that are available from local, state, federal and private sources.

HIS POLICY 1.1.5

The County, in conjunction with other historical/preservation organizations, shall prepare a list of historical and geographical names significant to Clay County's heritage. The Public Works and Economic and Development Services Departments shall make the list available to all developers and interested parties as an aid in naming streets and subdivisions.

HIS OBJ 1.2

Each historical resource identified in Clay County's Historical Resource Inventory will be evaluated for historical significance and will receive the appropriate recognition and protection.

HIS POLICY 1.2.1

The County will amend, as necessary, the Historic Preservation Ordinance for the purpose of continuing to recognize locally significant historical resources.

HIS POLICY 1.2.2

The County shall apply for historical state markers for eligible and significant county-owned historic sites as well as any available matching grants to offset the cost of the markers.

HIS OBJ 1.3

Clay County will assist the Historic Preservation Board and other historical organizations with planning grants, surveys and other public and private grants.

HIS POLICY 1.3.1

The County will assist historical organizations in the pursuit of applications for all available publication grants from public and private agencies and foundations to assist in printing county historical information (books and pamphlets).

HIS POLICY 1.3.2

The County will apply for the appropriate survey and planning grants available from both state and national preservation programs and consider the possibility of matching funds.

HIS OBJ 1.4

The County shall encourage the nomination of all appropriate structures, districts and objects to the National Register of Historic Places.

HIS POLICY 1.4.1

The Planning and Zoning Division will coordinate and assist the Historic Preservation Board in the preparation of a National Register of Historic Places Nomination Form as funds are available, to the Florida National Register Review Board for review as structures, districts and objects identified during the historical inventory are deemed eligible for nomination by qualified consultants or other historic preservation professionals.

HIS POLICY 1.4.2

Clay County will be responsible for the expense of nominating all National Register eligible resource on county-owned properties if any are identified or discovered.

HIS POLICY 1.4.3

The County shall make available to any interested person or organization information concerning the National Register of Historic Places, the nomination procedures and the benefits derived from listing in the National Register

HIS POLICY 1.4.4

Clay County shall continue to promote the preservation of historically significant housing and encourage its utility for residential use by adopting incentives for developers to protect and preserve historically significant housing in the County. Criteria for incentives may include granting a tax abatement to developers who do not destructively modify designated historically significant housing.

HIS OBJ 1.5

Clay County shall promote the enactment of a historic preservation overlay zone specifically relating to historically, architecturally and archaeologically significant sites.

HIS POLICY 1.5.1

The County shall enforce the historic preservation overlay zone that as a minimum shall include criteria for the protection of historic sites, structures and cemeteries, criteria and procedures for designating historically significant properties and enforcement procedures.

HIS OBJ 1.6

The County should utilize historically significant county-owned buildings for cultural and/or recreational purposes if practical.

HIS POLICY 1.6.1

The County shall make application to all appropriate agencies and organizations for assistance in funding a feasibility study for the purpose of rehabilitating suitable buildings.

HIS POLICY 1.6.2

The County shall notify all cultural and/or recreational authorities should a historic county building become available.

HIS POLICY 1.6.3

If feasible, the County shall follow the Secretary of the Interior's Standards for Rehabilitation for improvements of county-owned historic sites.

Definitions

Secretary of the Interior Standards for Preservation is defined as the act or process of applying measures necessary to sustain the existing form, integrity, and materials of an historic property. Work, including preliminary measures to protect and stabilize the property, generally focuses upon the ongoing maintenance and repair of historic materials and features rather than extensive replacement and new construction. New exterior additions are not within the scope of this treatment; however, the limited and sensitive upgrading of mechanical, electrical, and plumbing systems and other code-required work to make properties functional is appropriate within a preservation project. (National Park Service, 2017)

Secretary of the Interior Standards for Rehabilitation is defined as the act or process of making possible a compatible use for a property through repair, alterations, and additions while preserving those portions or features which convey its historical, cultural, or architectural values. (National Park Service, 2017)

Secretary of the Interior Standards for Restoration is defined as the act or process of accurately depicting the form, features, and character of a property as it appeared at a particular period of time by means of the removal of features from other periods in its history and reconstruction of missing features from the restoration period. The limited and sensitive upgrading of mechanical, electrical, and plumbing systems and other code-required work to make properties functional is appropriate within a restoration project. (National Park Service, 2017)

Secretary of the Interior's Standards for Archeological Documentation is defined as a series of actions applied to properties of archeological interest. Documentation of such properties may occur at any or all levels of planning, identification, evaluation or treatment. The nature and level of documentation is dictated by each specific set of circumstances. Archeological documentation consists of activities such as archival research, observation and recording of above-ground remains, and observation (directly, through excavation, or indirectly, through remote sensing) of below-ground remains. Archeological documentation is employed for the purpose of gathering information on individual historic properties or groups of properties. It is guided by a framework of objectives and methods derived from the planning process, and makes use of previous planning decisions, such as those on evaluation of significance. Archeological documentation may be undertaken as an aid to various treatment activities, including research, interpretation, reconstruction, stabilization and data recovery when mitigating archeological losses resulting from construction. Care should be taken to assure that documentation efforts do not duplicate previous efforts. (National Park Service, 2017)

RECREATION AND OPEN SPACE ELEMENT SUPPORT DOCUMENT

Data, Inventory & Analysis

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A. Introduction

The purpose of the Recreation and Open Space Element is to plan for a comprehensive system of public and private recreation facilities and open space sites to meet the current and future demand of residents and visitors in Clay County. Chapter 163 of the Florida Statutes (F.S.) provide the statutory authority and minimum criteria for the preparation, review, and determination of compliance of comprehensive plans. The statutory requirements of this element are to indicate a comprehensive system of public and private sites for recreation, including, but not limited to, natural reservations, parks and playgrounds, parkways, beaches and public access to beaches, open spaces, waterways, and other recreational facilities. No minimum criteria are currently effective in the Florida Administrative Code for this element. The element 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.

Recreation facilities are typically classified as either "resource-based" or "activity-based." Resource-based facilities are those that exist around particular natural resources such as forests, lakes, beaches, etc., and are normally used for hiking, swimming, boating, hunting, or any other activity dependent on the existing natural environment. Activity-based facilities, also called user-oriented, are those constructed for specific activities such as tennis, baseball, or basketball. Recreation facilities may also be classified as either active or passive; active implying the direct participation of the user, and passive suggesting a more relaxing type of activity such as nature study.

Clay County Park Classifications

Neighborhood Parks - A neighborhood park serves the residents of a community including a population of up to 5,000 and a service area of approximately five miles. These parks are often located near but not on major streets and/or elementary or middle schools for easy access. Typical activity-based recreational facilities may include informal open play areas, multi-purpose sports fields, courts, swimming pools, picnic and playground areas, and recreation centers. Park size ranges from 1/2 acre to 10 acres. Piers, trails, canoe and boat launches, or boardwalks may be provided when the parks include waterfront or other natural areas.

Community Parks - Community parks are located near or on major roadways and can serve two or three neighborhoods. These parks will serve populations of up to 20,000 within a radius of approximately 10 miles. The size of these parks usually ranges from 5 to 40 acres. Just as the neighborhood park fulfills the recreational needs of a relatively small community, the community park is often designed to meet the recreation needs of large areas or portions of Clay County.

The community park offers a wide-range of program and facility opportunities. In addition to the types of facilities provided at neighborhood parks, community parks typically include sports fields and courts suitable for league competition. Additional facilities may be included to meet a specific recreation demand in a community such as a horseshoe pit, pickleball court, or skate park.

Regional Parks - Regional parks are large, resource-based areas that serve two or more communities or counties and are usually located within an hour's driving distance of the residents they serve. The parks may serve a population of over 100,000 and could range in size

from a minimum of 150 acres to several hundred acres. Because regional parks are generally designed for resource-based activities, location is dependent upon the availability of high quality natural resources capable of sustaining and being developed and used for outdoor recreation.

Typical facilities provided at a regional park may include water-based recreation sites, camping areas, hiking and nature trails, picnic areas, environmental education, and other facilities not requiring intensive development. Parking areas are necessary support facilities and should be designed to minimize adverse effects on the natural environment. While fishing may be allowed in some County regional parks, hunting typically requires much larger areas. The provision of smaller resource-based parks in urban areas provides opportunities for environmental education and nature experiences for the urban and suburban population in a short driving distance from their homes. The most prominent feature of a regional park is that it provides recreational opportunities which capitalize on the natural environment and promote an atmosphere of beauty and serenity.

Boat Ramps – Boat ramps provide facilities for launching motorized and non-motorized watercraft that users transport to the site and then remove for storage or mooring elsewhere. Locations depend on appropriate access to appropriate water bodies large enough to support the kind of watercraft the ramp is designed to launch. The Clay County Manatee Protection Plan requires that boat facilities be designed, located, and dispersed to the extent necessary to prevent negative impacts on manatees and their habitat.

A paved ramp may not be required to launch small non-motorized craft such as canoes and kayaks, but some bank stabilization is required to prevent erosion. Motorized craft are launched from paved ramps. Adequate stabilized parking for boat trailers is necessary. Restrooms, picnic tables, fish-cleaning stations, and piers are often provided to provide waterfront access for non-boaters as well. Ramps may be incorporated into larger waterfront parks where there is adequate land to provide a variety of recreational facilities.

Municipal Parks – Parks are owned and maintained by the incorporated municipalities in Clay County are listed in Table 4.

B. Existing Conditions

This section identifies existing public and private recreation and open space sites available to the public, including natural reservations, parks, playgrounds, and boat ramp facilities. As a basis for estimating and projecting recreation and open space needs for Clay County over the next twenty-year period, this section will provide an inventory of existing public and private recreation and open space sites.

Table 1 – Existing County Neighborhood Parks

Name of Park	Acreage	Baseball Fields	Softball Fields	Basketball Courts	Football Fields	Soccer Fields	Tennis Courts
Black Creek Park	15	-	-	-	-	-	-
Deerfield Pt. Park	1.87	-	-	-	-	-	-
Doctors Lake Park	1	-	-	-	-	-	-
Eagle Harbor Park	7	-	-	2	-	-	-
Foxridge Park	2.86	-	-	-	-	-	2
Greenwood Park	1.13	-	-	1	-	-	-
Four Silo Park	6	-	1	1	-	-	2
Hunter-Douglas Park	10	-	1	1	-	-	1
Island Forest	2.8	-	-	1	-	-	-
Kingsley Lake Park	0.5	-	-	-	-	-	1
Main St. Park	5.5	-	-	-	-	-	-
Oak Creek Park	0.5	-	-	-	-	-	-
Pier Station Park	2	-	1	1	-	-	-
Thunderbolt Park	5.35	-	-	-	1	-	-
Ridaught Landing	0.92	-	-	-	-	-	-
W. E. Varnes	3.25	-	-	-	-	-	2
Williams Park	1	-	-	-	-	-	-
Foxmeadow Rec. Park	19.41	-	1	1	1	-	2
Lake Geneva Park	2.07	-	-	-	-	-	-
Moody Park	15	-	-	-	-	-	-
Total	103.16	0	4	8	2	0	10

Source: Clay County Parks, Recreation 10 Year Master Plan, Year 2017

Table 2 – Existing County Community Parks

Name of Park	Acreage	Baseball Fields	Softball Fields	Basketball Courts	Football Fields	Soccer Fields	Tennis Courts
Carl Pugh Park	7	4	1	-	-	-	2
Eagle Harbor Soccer Complex	28.96	-	-	-	-	12	-
Little Rain Lake Park	34.13	8	-	1	2	-	2
Omega Park	16.6	7	1	-	2	-	2
Paul C. Armstrong Park	18.11	-	3	1	-	2	2
Ronnie Van Zant Park	90	-	1	2	-	1	4
Tanglewood Park	12.73	5	-	-	-	-	2
Twin Lakes Park	50.8	1	-	-	-	3	2
Walter Odum Park	6.5	5	1	-	1	-	-
Plantation Sports Complex	26.03	-	-	-	-	5	-
P-4, Centex Homes FIAA	24.81	-	-	-	-	-	-
52A - Eagle Harbor FIAA	20	-	-	-	-	-	-
Oakleaf Plantation Park	105	-	-	-	-	-	-
Total	440.67	30	7	4	5	23	16

Source: Clay County Parks, Recreation 10 Year Master Plan, Year 2017

Table 3 – Existing Boat Ramps

County Boat Ramps	Lanes
Old Ferry	1
Lakeshore Park	2
Governor's Creek	2
Knight's Marina	3
Shands Bridge	1
Williams Park	1
Lake Brooklyn	1
Lake Geneva	1
SGT Hayes Memorial & Main Street Boat Ramp	1
Total	13

Source: Clay County Parks, Recreation 10 Year Master Plan, Year 2017

* Closed due to low water

Table 4 – Existing Municipal Parks

Data not available in Parks Master Plan (has not been updated from 2009)

Assets per City	Acres	Baseball Field	Softball Field	Football Field	Soccer Field	Basketball Court	Tennis Court
Orange Park							
Clarke (House) Park (N)	15	-	-	-	-	-	-
Gano Avenue Park (N)	2	-	-	-	-	-	1
Town Hall Park and Tot Lot (N)	7	-	-	-	-	-	-
Orange Park Skateboard Place (N)	2	-	-	-	-	-	-
Orange Park Athletic Association (C)	26	4	1	2	-	-	-
T.C. Miller Youth Learning Center (N)	1	-	-	-	-	1	
Keystone Heights		-	-	-	-	-	-
Keystone Beach (N)	1.4	-	-	-	-	-	-
Keystone Heights Theme Park (N)	2.5	-	-	-	-	1	2
Keystone Heights Natural Park (N)	3.2	-	-	-	-	-	-
Leona F. Terry Azalea Park (N)	0.9	-	-	-	-	-	-
Keystone Heights Recreation Park (N)	3	-	-	-	-	-	-
Penney Farms		-	-	-	-	-	-
Penney Farms Recreation Center (N)	1	-	-	-	-	-	-
Farms Tennis Courts (N)	1.8	-	-	-	-	-	2
Green Cove Springs							
Spring Park (N)	5	-	-	-	-	-	-
Vera Francis Hall Park (N)	12	1	-	-	-	1	-
Green Cove Springs Nature Preserve	138	-	-	-	-	-	-
Augusta Savage Friendship Park (N)	0.9	-	-	-	-	-	-
Total	222.7	5	1	2	0	3	5

(N) Neighborhood Park, (C) Community Park

Source: 2008 Data and Analysis for Recreation and Open Space Element.

Table 5 – Existing Recreation Assets

Total Assets	Baseball Fields	Softball Fields	Basketball Courts	Football Fields	Soccer Fields	Tennis Courts
County	30	11	12	7	23	26
Municipal	5	1	3	2	0	5
Total	35	12	15	9	23	31

Source: Clay County Parks, Recreation 10 Year Master Plan, Year 2017; 2008 Data and Analysis for Recreation and Open Space Element.

Open Space

Open space in Clay County includes the largely undeveloped and slightly altered portions of public recreation facilities. Open space in the County also includes permitted mitigation banks, public conservation lands not open to the public, restricted areas of Camp Blanding Joint Training Facility, lands subject to the Branan Field Master Plan Primary Conservation Network regulations and Lake Asbury Master Plan Asbury Greenway regulations requiring preservation, and lands owned by private conservation organizations. Other lands subject to conservation easements, stormwater management ponds, subdivision common areas such as landscaped areas and vegetative buffers, and lakes that are held in common private ownership also provide open space. These areas are not generally accessible for public use, but do protect natural ecosystems or provide scenic beauty within and surrounding the developed areas of the county. Lands of this type along waterways provide scenic surroundings for boaters and help support fish habitat for anglers.

Other open space areas will include areas designated for conservation on the Future Land Use Map of this comprehensive plan. Land development regulations adopted by the County define open space requirements for limited development densities and intensities of use in agricultural areas through the use of clustering provisions. The Conservation land use category is defined in the Future Land Use Element as applying to wetlands delineated according to the State of Florida wetland delineation rule. Residential density is limited on those lands unless alterations are permitted by other regulatory agencies with jurisdiction over wetlands. Additional open space requirements are incorporated into land development regulations for the Branan Field and Lake Asbury Master Plan Areas.

Regional Parks

Camp Chownwaw County Park is located north of Green Cove Springs at Ball Road and US Highway 17 at the Black Creek Bridge in the Green Cove Springs Planning District. The park was purchased in 2006 from the Girl Scouts of Gateway Council and opened to the public in May 2007. The purchase of this property was made possible through the Florida Communities Trust and the Clay County Board of County Commissioners. The park had served as a camp for the Girl Scouts for 70 years and retains several historic structures, some of which were constructed by the Civilian Conservation Corps in the 1930's. The park is situated on 150 acres and offers many resource-based activities such as camping, hiking/nature trails, a fishing pier and boardwalk, bird watching, wildlife viewing, and picnicking as well as a recently refurbished swimming pool, horseshoe pits, and volleyball. A canoe launch is planned for the future and environmental education programs are planned for the near future. Currently there is a full-time Park Ranger and maintenance crew to assist with reservations and general park maintenance.

Moccasin Slough County Park is located at Raggedy Point Road and US Highway 17 in the Fleming Island Planning District. The 255-acres were purchased with assistance from the Florida Communities Trust, Land and Water Conservation Fund, North Florida Land Trust, the Trust for Public Land and other private funding. The property will be developed into a resource-based nature preserve and environmental learning center with additional recreation facilities to include a paved bicycle and fitness trail, boardwalk, playground and picnic areas. The Division of Parks, Recreation and Special Events was awarded a Land and Water Conservation Fund grant to move forward with development of the park. Initial construction began in 2008.

Veterans Park is a 641-acre County-owned tract that was formerly part of Cecil Field NAS. It is situated on the east side of Jennings State Forest in the Doctors Inlet/Ridgewood Planning

District. The property was donated to Clay County by the National Park Service when Cecil Field closed. Currently the property has no public road access due to the surrounding Cecil Commerce Center, Jennings State Forest, and a private hunting preserve. Parks, Recreation and Special Events staff has been negotiation with the Florida Division of Forestry to determine a plan for access to the property as well as timber management. Once access is established, the Division will maintain the facility as a resource-based park with picnicking, hiking and equestrian trails and wildlife viewing.

C. Level of Service Analysis

The purpose of this section is to review the County's existing recreational facilities to ensure they are adequate to serve the existing population. Levels of service (LOS) for these facilities must be established to ensure future supply of recreational facilities that will satisfy future demand. Municipal facilities were included throughout the LOS analysis, where School Board facilities were not. Since the municipal facilities were used for the analysis, the population projections for the entire County, not just the unincorporated area, were used in the LOS analysis.

Level of service is an indicator of the extent or degree of service provided by, or proposed to be provided by a recreational facility based on and related to the operational characteristics of the facility. Level of service indicates the capacity per unit of demand for each public facility. In addition, this section will assess the future demands for recreational facilities and develop actions the County will need to take to continue providing an acceptable level of recreational service to the year 2040.

Table 6 – Existing Clay County LOS Standards

Type of Facility	Number per unit Population
Boat Ramp Lane	1 per 25,000 persons
Baseball Field	1 per 7,500 persons
Softball Field	1 per 5,500 persons
Football Field	1 per 24,000 persons
Soccer Field	1 per 5,500 persons
Basketball Court	1 per 5,500 persons
Tennis Court	1 per 4,500 persons
Type of Park	Acreage per unit Population
Neighborhood Park	1 acre per 2,100 persons
Community Park	1 acre per 700 persons
Branan Field Master Plan	
Community Park	500 sq ft/housing unit

Source: Clay County Parks, Recreation 10 Year Master Plan, Year 2017; Branan Field Master Plan

Current Recreation Demand

The current recreation demand for the facilities that this Element sets the LOS standards for is outlined in Table 7 below. Using the current population for Clay County the data shows there is a mix of surplus and deficiencies with these facilities. The greatest surplus is in the number of acres in community parks followed closely by the surplus of neighborhood park acreage. The greatest deficiency is with softball fields which is followed by basketball courts. This analysis is solely quantitatively based and doesn't take into the perception of the users of these facilities.

A location analysis of the planning districts and current recreation facilities reveals a different outcome of surplus/deficiencies per planning district. There are some planning districts that have a deficiency in a recreation facility that is shown as a surplus for the County.

Table 7 – Level of Service Standards Existing Conditions

Type of Park/Facility	Standard	Demand		Current Inventory		Surplus/Deficiency	
Branan Field							
Community Park	500 sf/unit	10.51	acres	0.00	acres	10.51	acres
Total County	Acre/Pop						
Community Park	1/700	279	acres	604.67	acres	+325.67	acres
Neighborhood Park	1/2,100	93	acres	161.86	acres	+68.86	acres
	Unit/Pop						
Baseball Field	1/7,500	26		42		+16	
Softball Field	1/5,500	36		11		-25	
Football Field	1/24,000	8		14		+6	
Soccer Field	1/5,500	36		30		-6	
Basketball Court	1/5,500	36		19		-17	
Tennis Court	1/4,500	43		34		-9	
Boat Ramp Lanes	1/25,000	8		13		+5	
County Population (2017)	195,322						

Source: Clay County Parks and Recreation 10 Year Master Plan (2017)

Future Recreation Demand

Applying the LOS standards for each recreation facility to the population projections for Clay County creates the future recreation demand. In Table 8 the population projections are broken down in five year increments starting in 2020. Table 8 demonstrates the surpluses and deficiencies of recreation facilities into the future if no additional recreation facilities are added to the County inventory. There are several recreation facility types that will be deficient county-wide into the future if no inventory is added. Municipal facilities were included in the inventory for each of the recreation facilities.

Table 8 – Future Recreation Demand, County-wide Facilities

Negative # is a deficit	Year	2020		2025		2030		2035		2040	
	Pop.	223,400		244,200		262,100		278,700		294,100	
	Inventory	Demand	Delta	Demand	Delta	Demand	Delta	Demand	Delta	Demand	Delta
Community Park	604.67	319	286	349	256	374	230	398	207	420	185
Neighborhood Park	161.86	106	55	116	46	125	37	133	29	140	22
Baseball Field	42	30	12	33	9	35	7	37	5	39	3
Softball Field	11	41	-30	44	-33	48	-37	51	-40	53	-42
Football Field	14	9	5	10	4	11	3	12	2	12	2
Soccer Field	30	41	-11	44	-14	48	-18	51	-21	53	-23
Basketball Court	19	41	-22	44	-25	48	-29	51	-32	53	-34
Tennis Court	34	50	-16	54	-20	58	-24	62	-28	65	-31
Boat Ramp Lanes	13	9	4	10	3	10	3	11	2	12	1

Source: Medium Projections of University of Florida Bureau of Economic and Business Research Florida Population Studies; Bulletin 177, April 12, 2017; Clay County Division of Planning and Zoning, May 16, 2017; Clay County Parks and Recreation 10 Year Master Plan (2017)

Knowing the surplus/deficiency for the county-wide LOS is only half the story. Understanding where these surpluses and deficiencies exist geographically is important when siting new recreation facilities. This location analysis was conducted at the planning district level to determine the areas of the County that would be well-suited from a LOS standpoint for future recreation facilities. Table 9 represents the recreation demand for each type of facility listed with an LOS in the Recreation & Open Space Element of the Comprehensive Plan for each planning district.

Table 9 – Future Recreation Demand per Planning District

(carries over multiple pages)

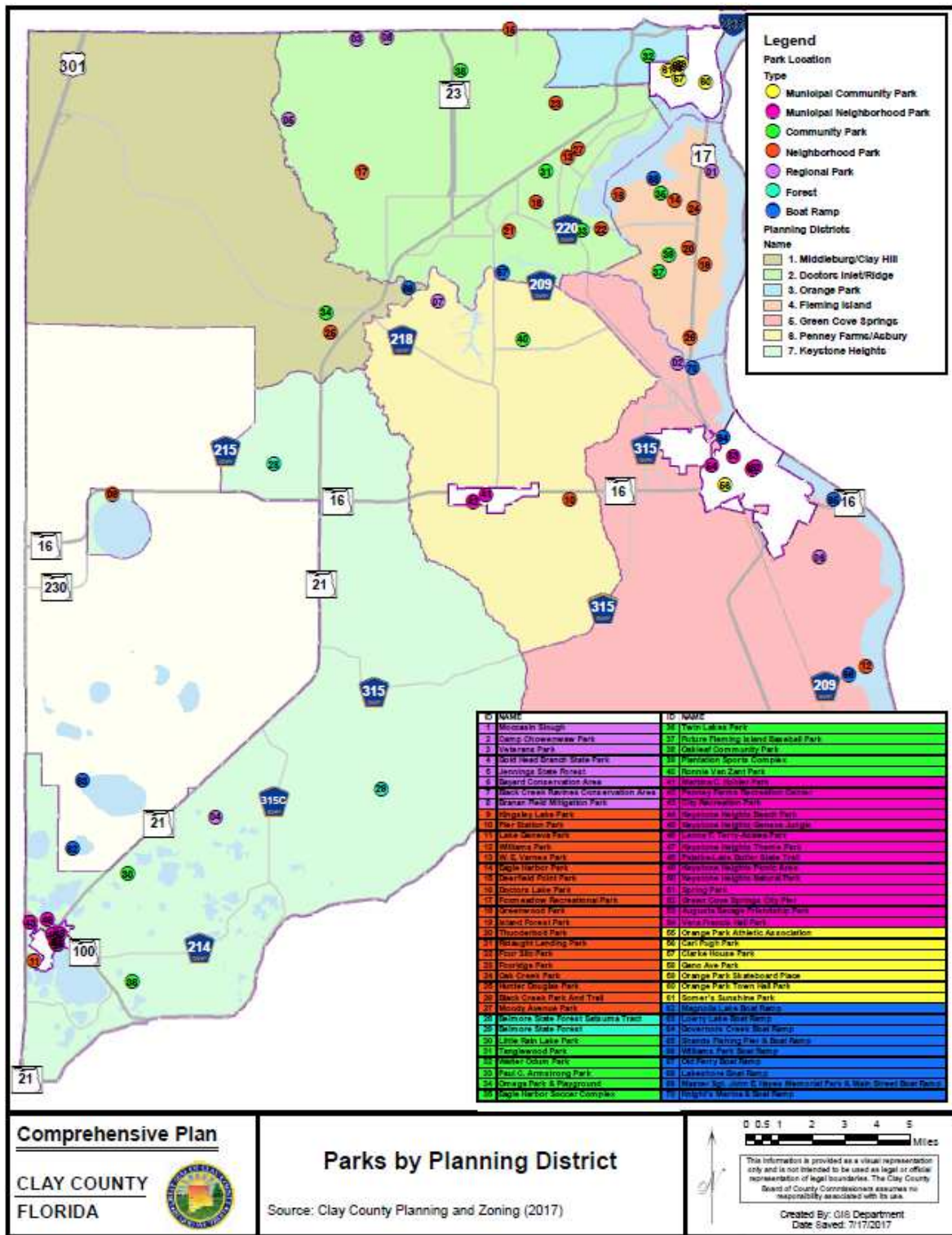
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Softball Fields														
LOS	1/5,500	County Assets	City Assets	Total Assets	2020		2025		2030		2035		2040	
Planning Districts					Req	Delta	Req	Delta	Req	Delta	Req	Delta	Req	Delta
Middleburg/Clay Hill		2	-	2	3	-1	3	-1	3	-1	3	-1	3	-1
Doctors Inlet		3	-	3	16	-13	17	-14	17	-14	18	-15	19	-16
Orange Park		3	1	4	5	-2	5	-2	5	-2	5	-2	5	-2
Fleming Island		0	-	0	5	-5	5	-5	5	-5	5	-5	5	-5
Green Cove Springs		1	-	1	3	-2	4	-3	6	-5	7	-6	8	-7
Penney Farms/Lake Asbury		1	-	1	5	-4	6	-5	8	-7	9	-8	9	-8
Keystone Heights		0	-	0	3	-3	3	-3	3	-3	3	-3	3	-3
Football Fields														
LOS	1/24,000	County Assets	City Assets	Total Assets	2020		2025		2030		2035		2040	
Planning Districts					Req	Delta	Req	Delta	Req	Delta	Req	Delta	Req	Delta
Middleburg/Clay Hill		2	-	2	1	1	1	1	1	1	1	1	1	1
Doctors Inlet		3	-	3	4	-1	4	-1	4	-1	4	-1	4	-1
Orange Park		3	2	5	1	2	1	2	1	2	1	2	1	2
Fleming Island		1	-	1	1	0	1	0	1	0	1	0	1	0
Green Cove Springs		0	-	0	1	-1	1	-1	1	-1	2	-2	2	-2
Penney Farms/Lake Asbury		1	-	1	1	0	1	0	2	-1	2	-1	2	-1
Keystone Heights		2	-	2	1	1	1	1	1	1	1	1	1	1
Soccer Fields														
LOS	1/5,500	County Assets	City Assets	Total Assets	2020		2025		2030		2035		2040	
Planning Districts					Req	Delta	Req	Delta	Req	Delta	Req	Delta	Req	Delta
Middleburg/Clay Hill		0	-	0	3	-3	3	-3	3	-3	3	-3	3	-3
Doctors Inlet		1	-	1	16	-15	17	-16	17	-16	18	-17	19	-18
Orange Park		0	-	0	5	-5	5	-5	5	-5	5	-5	5	-5
Fleming Island		20	-	20	5	15	5	15	5	15	5	15	5	15
Green Cove Springs		0	-	0	3	-3	4	-4	6	-6	7	-7	8	-8
Penney Farms/Lake Asbury		0	-	0	5	-5	6	-6	8	-8	9	-9	9	-9
Keystone Heights		9	-	9	3	6	3	6	3	6	3	6	3	6
Tennis														
LOS	1/4,500	County Assets	City Assets	Total Assets	2020		2025		2030		2035		2040	
Planning Districts					Req	Delta	Req	Delta	Req	Delta	Req	Delta	Req	Delta
Middleburg/Clay Hill		2	-	2	4	-2	4	-2	4	-2	4	-2	4	-2
Doctors Inlet		12	-	12	20	-8	21	-9	21	-9	22	-10	23	-11
Orange Park		3	1	4	6	-3	6	-3	6	-3	6	-3	6	-3
Fleming Island		0	-	0	6	-6	7	-7	6	-6	6	-6	6	-6
Green Cove Springs		2	-	2	4	-2	5	-3	7	-5	9	-7	10	-8
Penney Farms/Lake Asbury		5	2	7	6	-1	8	-3	9	-4	10	-5	11	-6
Keystone Heights		5	2	7	4	1	4	1	4	1	4	1	4	1

Basketball														
LOS	1/4,500	County Assets	City Assets	Total Assets	2020		2025		2030		2035		2040	
Planning Districts					Req	Delta	Req	Delta	Req	Delta	Req	Delta	Req	Delta
Middleburg/Clay Hill		2		2	4	-2	4	-2	4	-2	4	-2	4	-2
Doctors Inlet		12		12	20	-8	21	-9	21	-9	22	-10	23	-11
Orange Park		3	1	4	6	-3	6	-3	6	-3	6	-3	6	-3
Fleming Island		0		0	6	-6	7	-7	6	-6	6	-6	6	-6
Green Cove Springs		2	1	3	4	-2	5	-3	7	-5	9	-7	10	-8
Penney Farms/Lake Asbury		5		5	6	-1	8	-3	9	-4	10	-5	11	-6
Keystone Heights		5	1	6	4	1	4	1	4	1	4	1	4	1

Source: Medium Projections of University of Florida Bureau of Economic and Business Research Florida Population Studies; Bulletin 177, April 12, 2017; Clay County Division of Planning and Zoning, May 16, 2017; Clay County Parks and Recreation 10 Year Master Plan (2017)

Figure 1 – Parks by Planning District



D. Future Recreational Facilities

The following table consists of the capital projects identified projects in the Clay County Parks and Recreation 10-Year Master Plan, 2017.

Table 10 – Future Recreation Facilities

(carries over multiple pages)

NAME OF PARK	PROJECT	COST	COMMENTS
Omega Park			
	Build new Concession and Bathroom	\$350,000	Football side (215K allocated for land - re-allocate)
Fox Meadow			
	Build Restrooms	\$80,000	
Twin Lakes			
	Field Lighting	\$500,000	
Little Rain Lake			
	Field Lighting	\$400,000	T-ball and Football Fields
Eagle Harbor Soccer Complex			
	Indoor Rec Facility	\$2,000,000	Multi-Sport/Shelter
	Stadium Bleachers	\$75,000	Field #15
	Expansion of Clubhouse	\$100,000	
Oakleaf Community Park			
	Parking Lot	\$733,000	\$362,766.60 in Budget
	Field Lighting (football)	\$250,000	
	Phase II Development	\$2,000,000	
Moccasin Slough Park			
	Restroom / Classroom Bldg.	\$400,000	Per Management Plan (currently no facilities)
	Boardwalk and Tower	\$750,000	Per Plan - Boardwalk to Edge of Slough/ Sawgrass
	Pavilions (3)	\$60,000	
Moody Avenue Park			
	Field Lighting	\$200,000	Funded
	ADA Baseball Field	\$457,000	Construction has started
	Dog Park	\$50,000	Multiple survey request
Camp Chowenwaw Park			
	Boardwalk and Tower	\$450,000	Extend Boardwalk to Peters Creek
	Construct Family Tree House	\$150,000	Revenue Source

NAME OF PARK	PROJECT	COST	COMMENTS
	RV Park	\$2,000,000	Revenue Source
Fairgrounds			
	New Concession Bldg.	\$300,000	Replacement of Cattlemans
	Add Bleachers to Arena		Add Bleachers to South and West Ends
	New Stage Bldg.	\$300,000	Relocate / Replace existing stage
	Replace Water and Sewer Service	\$1,000,000	Funded - Current Balance \$926,528.20
	Add Restrooms	\$300,000	South Side of Arena
Middleburg			
	Splash Park	\$500,000	Multiple Survey Request
South Prong Black Creek			
	Canoe / Kayak Launch and Park	\$300,000	Land, Clearing and Launch – Supports Eco-tourism initiatives
Fleming Island			
	Thunderbolt (multi-purpose fields)	\$745,000	Funded
	Baseball Fields	\$2,500,000	1m allocated in CIP
Lake Asbury / Penny Farms			
	Land and Athletic Park	\$8,000,000	
All Planning Districts			
			All planning districts are deficient in recreational facilities. The County will need to plan and fund accordingly.

Source: Clay County Parks and Recreation 10 Year Master Plan (2017)

E. 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 commented 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 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.

The current Recreation and Open Element objectives and policies speak to providing parks and recreation facilities to meet demand. Impact fees are addressed in Policy 1.3.3. This issue is adequately addressed by the current objectives and policies.

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 Recreation and Open 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 Recreation and Open 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 Recreation and Open 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.

The current objectives and policies sufficient address this issue adequately.

F. Matrix for Evaluating Plan Policies

As part of the evaluation of the 2025 Comprehensive Plan's Recreation and Open Space 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?

Recreation and Open Space	Measurable Target	Defined Terms	Achieved	Major Issue	Statute Requires	Supports Others	Observations
GOAL 1	No	No		Yes	No	No	
OBJ 1.1	Yes	No		Yes	No	No	LOS standards are from FDEP. Should County develop their own based on stakeholder input?
POLICY 1.1.1	Yes	No		Yes	No	No	LOS standards are from FDEP. Should County develop their own based on stakeholder input?
POLICY 1.1.2	Yes	No		Yes	No	No	LOS standards are from FDEP. Should County develop their own based on stakeholder input?
POLICY 1.1.3	No	No		Yes	No	No	Need to ensure the Future Neighborhood Park Siting Map and the Future Community Park Siting Map are up to date.
POLICY 1.1.4	No	No		Yes	No	Yes	Could add additional language to improve siting criteria for recreation facilities. References the Transportation Element
POLICY 1.1.5	No	No		Yes	No	No	None

Recreation and Open Space	Measurable Target	Defined Terms	Achieved	Major Issue	Statute Requires	Supports Others	Observations
POLICY 1.1.6	No	No		Yes	No	No	
POLICY 1.1.7	No	No		Yes	No	No	Need to verify if this is ongoing.
POLICY 1.1.8	No	No		Yes	No	No	
POLICY 1.1.9	No	No		Yes	No	No	Need to add a measurable target for revolving plan update.
OBJ 1.2	No	No		Yes	No	No	
POLICY 1.2.1	No	No		Yes	No	No	
POLICY 1.2.2	No	No		Yes	No	No	
POLICY 1.2.3	No	No		Yes	No	No	
POLICY 1.2.4	No	No		Yes	No	No	
POLICY 1.2.5	No	No		Yes	No	No	
POLICY 1.2.6	No	No		Yes	No	No	
POLICY 1.2.7	Yes	No		Yes	No	No	Adopted by 2012. Has it? If not, need to add a new target date.
OBJ 1.3	No	No		Yes	No	No	
POLICY 1.3.1	No	No		Yes	No	No	
POLICY 1.3.2	No	No		Yes	No	No	
POLICY 1.3.3	No	No		Yes	No	No	
POLICY 1.3.4	No	No		Yes	No	No	
OBJ 1.4	No	No		Yes	No	No	More on open space than recreation.
POLICY 1.4.1	No	No		Yes	No	No	More on open space than recreation.
POLICY 1.4.2	No	No		Yes	No	No	More on open space than recreation.
POLICY 1.4.3	No	No		Yes	No	No	

G. Assessment of Changes to Florida Statutes

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

While there are a number statutory changes that have occurred since 2009, none of these changes directly impact the Goals, Objectives and Policies of the Recreation and Open Space Element.

H. Conclusions and Proposed Revisions

The Comprehensive Plan is substantively up-to-date and the County has done a good job of implementing its Comprehensive Plan. Most necessary amendments are those as required by changes in State law, or to provide greater emphasis on issues of particular importance to Clay County.

- Add the name of the Element to all GOPs to better differentiate among others in the Comprehensive Plan.
- Identify all Policies with three numbers for consistency with numerical style already used in the Future Land Use Element, Housing Element, and Transportation Element.

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

Proposed Amendment to REC Policy 1.1.4

Revise the Policy to address the requirement for establishing improved recreation facility siting criteria:

REC POLICY 1.1.4

The siting of future recreational facilities shall be prioritized upon the following criteria, listed in order of importance.

- a) For boat ramps, the boat facility siting requirements of adopted Clay County Manatee Protection Plan
- b) Land acquisition and site improvement costs.
- c) Proximity to the largest population centers within each planning district that ~~which~~ reflects recreational demand.
- d) Ease of public access based on roadway functional classifications as shown in Transportation Element.
- e) Potential sites determined to accommodate the most deficient recreational facilities shall be considered of higher priority in the siting process.
- f) Land area available for recreational facility development.

Proposed Amendment REC Policy 1.1.7

Revise the Policy to reaffirm lighting assessment feasibility:

REC POLICY 1.1.7

The County will continue to assess the feasibility of installing lights at existing ball fields to accommodate demand during league competition played at night.

*Proposed Amendment REC Policy 1.1.9**Revise the Policy to add a measurable target:***REC POLICY 1.1.9**

The County shall adopt a Parks and Recreation Master Plan to guide acquisition and development of a coordinated county-wide system of recreation sites and programs that reflects the population's needs. This Master Plan shall include financial tools to ensure the adopted plan is adequately funded. This Master Plan shall be updated/amended every five (5) years.

*Proposed Amendment REC Policy 1.2.7**Revise the Policy to amend the measurable target date:***REC POLICY 1.2.7**

The County shall adopt a Greenways and Trails Master Plan by ~~2012~~ 2019 to guide acquisition and development of a coordinated system of land and water-based greenways and trails to link recreation sites, natural areas, open spaces and trails within the County.

EXHIBIT I

INTRODUCTION

PURPOSE AND INTENT OF THE RECREATION AND OPEN SPACE ELEMENT

The Recreation and Open Space Element is intended to guide public decision-making while providing for a comprehensive system of public and private recreation and open space sites available for public use. This Element considers the existing County recreational facilities, determines current deficiencies, and projects future recreation and open space needs. Goals, objectives, and policies are then recommended to guide decisions based on the projected recreational demand of visitors and residents in Clay County.

Recreation is required to maintain a healthy balance in life. What people do in their leisure time is in response to their internal needs and desires, and the quality and quantity of recreational opportunities available to a community has a direct effect on the general quality of life. Thus, satisfying people's recreational needs is important to maintain the high quality of life in Clay County.

There are four general considerations addressed by the goals, objectives, and policies. These include the coordination of public and private resources to meet the recreation demand, the quality and quantity of recreational facilities, the availability of recreational facilities for public use, and the provision of open space sites.

REC GOAL 1

To provide, protect, and maintain a high-quality, environmentally sensitive, accessible, economically efficient, and adequate system of recreation facilities and sites and open space that serves Clay County residents and visitors.

REC OBJ 1.1

Clay County will acquire, develop, maintain, and protect parks and recreation facilities, consistent with the needs of its population, as determined by the County's recreation levels of service.

REC POLICY 1.1.1

The County will adopt and maintain the following countywide recreation levels of service (LOS) for parks:

Type of Park:

Neighborhood Parks	1 acre per 2,100 persons
Community Parks	1 acre per 700 persons

REC POLICY 1.1.2

The County shall adopt and maintain the following levels of service (LOS) for recreation facilities:

Countywide:

Boat Ramp Lanes	1 per 25,000 persons
Baseball Field	1 per 7,500 persons
Softball Field	1 per 5,500 persons
Football Field	1 per 24,000 persons
Soccer Field	1 per 5,500 persons
Basketball Court	1 per 5,500 persons
Tennis Court	1 per 4,500 persons

REC POLICY 1.1.3

Clay County will continue to identify, evaluate, and acquire future recreation sites within the generalized areas outlined on the Future Neighborhood Park Siting Map and Future Community Park Siting Map in the Future Land Use Map Series to maintain the adopted levels of service (LOS).

REC POLICY 1.1.4

The siting of future recreational facilities shall be prioritized upon the following criteria, listed in order of importance.

- a) For boat ramps, the boat facility siting requirements of adopted Clay County Manatee Protection Plan.
- b) Land acquisition and site improvement costs.
- c) Proximity to the largest population centers within each planning district that reflects recreational demand.
- d) Ease of public access based on roadway functional classifications as shown in Transportation Element.
- e) Potential sites determined to accommodate the most deficient recreational facilities shall be considered of higher priority in the siting process.
- f) Land area available for recreational facility development.

REC POLICY 1.1.5

The County shall develop a list of management priorities for each park in the Clay County Park Inventory in terms of existing and future tasks, park relationships to surrounding uses, and other functions of the park system, including an analysis of existing vacant County-owned lands for temporary or permanent recreation use. The list of management priorities shall be included in annual budget for the Division of Parks, Recreation and Special Events.

REC POLICY 1.1.6

The County shall establish locations, and design standards for providing public access to water ways.

REC POLICY 1.1.7

The County will assess the feasibility of installing lights at existing ball fields to accommodate demand during league competition played at night.

REC POLICY 1.1.8

The County shall require that all new developments that abut the Florida Trail provide adequate buffering to protect the integrity of this facility.

REC POLICY 1.1.9

The County shall adopt a Parks and Recreation Master Plan to guide acquisition and development of a coordinated county-wide system of recreation sites and programs that reflects the population's needs. This Master Plan shall include financial tools to ensure the adopted plan is adequately funded. This Master Plan shall be updated/amended every five (5) years.

REC OBJ 1.2

The County will improve public access to existing and future recreation sites and facilities, open space systems, and freshwater beaches and shores to meet the recreational needs of County residents and visitors.

REC POLICY 1.2.1

New Planned Unit Developments (PUDs) shall provide a system of bike-ways, foot-paths, or nature trails linking recreational facilities and open space within residential areas.

REC POLICY 1.2.2

Those future neighborhood-level recreational facilities that are not located within or adjacent to community park facilities shall be provided with bicycle and pedestrian access ways from adjacent residential land uses.

REC POLICY 1.2.3

The County and private suppliers of recreational facilities will provide sufficient parking spaces at all County and private recreation sites. Bicycle racks shall be provided at all County and private recreation sites.

REC POLICY 1.2.4

Undeveloped and future park sites shall include vehicular access to a public roadway concurrent with the development of the park site.

REC POLICY 1.2.5

Future recreational facilities shall be designed with the character and quality of natural resources found on-site.

REC POLICY 1.2.6

The County shall provide safe access and parking facilities for the handicapped at all recreational sites by maintaining no physical barriers. If physical barriers exist to accessing a recreational site, they shall be eliminated where possible.

REC POLICY 1.2.7

The County shall adopt a Greenways and Trails Master Plan by 2019 to guide acquisition and development of a coordinated system of land and water-based greenways and trails to link recreation sites, natural areas, open spaces and trails within the County.

REC OBJ 1.3

The County will coordinate with and provide technical assistance to suppliers of public recreational opportunities so that available resources and programs are maximized toward meeting the recreational needs of all segments of the population.

REC POLICY 1.3.1

Clay County shall coordinate annually through its Division of Parks, Recreation and Special Events with the Clay County School Board for joint use of recreational facilities by organized recreational programs at designated school sites.

REC POLICY 1.3.2

The County shall coordinate with the State of Florida, Department of Environmental Protection, Division of Forestry, US Department of the Interior, St. John's River Water Management District, and other providers of recreational and conservation lands to enhance and expand the County's open space and recreation system.

REC POLICY 1.3.3

At such time as Clay County is unable to maintain the adopted recreation facility level of service, the County shall establish alternative funding mechanisms including the assessment of new development on equitable pro-rata share of the costs to provide parks and recreational facilities

through donations of land suitable for development of facilities included in the adopted Levels of Service standards, provision of facilities and/or impact fees.

REC POLICY 1.3.4

The County shall require recreation/open space to be addressed directly by each applicant for a development permit. At that time, each development application shall submit data on the development's projected demands and evidence that the applicable levels of service shall not be adversely impacted. If proposed development is found to compromise certain points of the required levels of service, applicant will be required to provide said deficient facility.

REC OBJ 1.4

Clay County shall ensure that an adequate amount of open space is maintained in all new residential and non-residential development, and preserve environmentally sensitive areas and native habitats.

REC POLICY 1.4.1

The County shall establish standards for maximum lot coverage for residential and non-residential development to ensure that adequate open space is maintained. These standards shall be applicable to public agencies and private development.

REC POLICY 1.4.2

The County shall maintain adequate open space by only permitting developments by public agencies and private entities that are consistent with the adopted recreation LOS standards.

REC POLICY 1.4.3

The County shall establish minimum open space requirements for mixed-use (PUDs) and multi-family developments that are consistent with the adopted recreation LOS standards.

Definitions

Neighborhood Parks - A neighborhood park serves the residents of a community including a population of up to 5,000 and a service area of approximately five miles. Park size ranges from 1/2 acre to 10 acres.

Community Parks - Community parks are located near or on major roadways and can serve two or three neighborhoods. These parks will serve populations of up to 20,000 within a radius of approximately 10 miles. The size of these parks usually ranges from 5 to 40 acres

Regional Parks - Regional parks are large, resource-based areas that serve two or more communities or counties and are usually located within an hour's driving distance of the residents they serve. The parks may serve a population of over 100,000 and could range in size from a minimum of 150 acres to several hundred acres.

Boat Ramps – Boat ramps provide facilities for launching motorized and non-motorized watercraft that users transport to the site and then remove for storage or mooring elsewhere.

ECONOMIC DEVELOPMENT ELEMENT SUPPORT DOCUMENT

Data, Inventory & Analysis

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A. Introduction

Economic Development is an optional Element in Clay County's Comprehensive Plan, but the importance of the economy to the county's overall future, its communities and its neighbors, justify the inclusion of this topic. This Element addresses and provides direction for the economic issues that the county faces today, as well as into the future.

While this Element focuses upon issues such as business retention, expansion and recruitment, it is important to recognize there are multiple strategies, policies, and programs for achieving successful economic development. The Economic Development Element is a starting point. It interacts with every chapter in every Element of this Plan to promote economic vitality. In fact, the Comprehensive Plan itself can be considered an economic development tool.

The economy has a central role in maintaining the vitality and quality of life within a community. Economic development is typically described as the creation of jobs and wealth and the improvement of quality of life for all residents and visitors. A healthy economy creates good paying jobs, providing economic opportunities to all citizens. The economy also supports the tax base, which enables the provision of schools, police, fire protection, parks and many other community facilities and services.

Economic development is not an isolated activity contained within the borders of our county. It can be affected by events occurring at a city, county, regional, state, national or international scale. To be successful, economic development activities must be carried out through partnerships with other governments or agencies. The direction of this Comprehensive Plan, along with the actions and initiatives of the public and private sectors, work in concert to achieve the overall economic success we so desire for our community.

The coordination of economic development with other land use goals is important to the overall quality of life in Clay County. Economic policy choices must be supportive of other adopted county goals. The benefits of a healthy economy are recognized when economic programs revitalize neighborhoods and business districts, brings good jobs into the community, provide adequate and affordable housing for all residents, and support walkable communities. Clay County is recognized for having an excellent quality of life, especially for young families and older adults. Quality of life indicators include the natural environment, recreational, public safety, education, and affordable housing. A positive perception of these quality of life indicators is critical for many businesses when they are determining whether or not to invest in an area.

The ability of a community to attract and sustain economic development is also tied to the quality of its infrastructure including roadways; telecommunications infrastructure, stormwater systems; water, sewer, and reclaimed water systems; electric generation and transmission systems; solid waste collection, recycling and disposal facilities; schools; parks; and various other facilities. The provision of these infrastructure systems and services often requires intergovernmental coordination, as projects often cross municipal borders throughout the county and the region. Funding identified in capital improvement programs ensures that infrastructure is available to the public in a timely manner, meets level of service requirements for such facilities, and is in place to support and enhance the area economy.

B. Data and Analysis

The data utilized in this report provides for a broad overview of major economic metrics which are indicators of the status and character of the local economy. Overtime, these indicators may be used to evaluate the effectiveness of the implementation of economic development policies and to analyze the achievement of community goals as identified in the Comprehensive Plan. The data included is derived from a number of publically available sources which can be utilized to review either a snapshot in time or trends in the community as well as provide comparisons with the State of Florida or the United States.

Population and Income

Population Projection

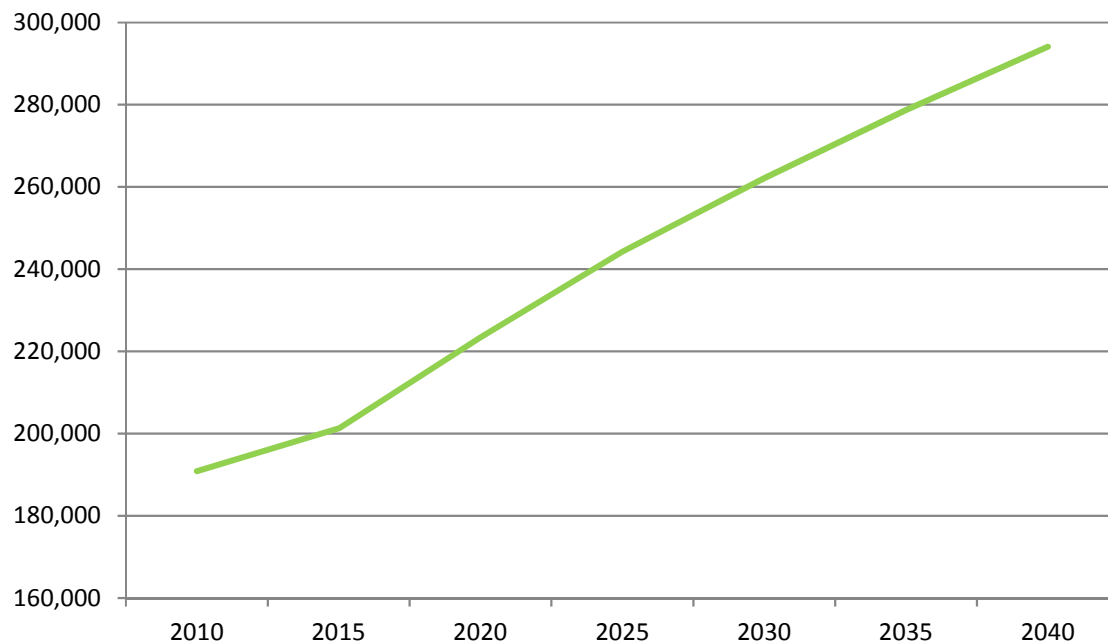
As illustrated in **Table 1** the population projection for Clay County from 2010 through 2040 reflects a total change of 103,235 persons.

Table 1 - Clay County Population Projection, 2010 to 2040

	2010	2015	2020	2025	2030	2035	2040
Population	190,865	201,280	223,400	244,200	262,100	278,700	294,100
Increase Over Previous	--	5.5%	8.8%	9.3%	7.3%	6.3%	5.5%

Source: Medium Projections of University of Florida Bureau of Economic and Business Research Florida Population Studies; Bulletin 177, April 12, 2017 Clay County Division of Planning and Zoning, May 16, 2017

Figure 1 – Clay County Population Projection, 2010 to 2040



Source: Medium Projections of University of Florida Bureau of Economic and Business Research Florida Population Studies; Bulletin 177, April 12, 2017 Clay County Division of Planning and Zoning, May 15, 2017

Population Projection by Age

By 2040, the largest percent increase in the population age cohort is projected to be residents aged 75 years and older -- an increase of 165 percent from 2020. This trend reflects a common phenomenon of an aging population in communities all across the US and represents a number of opportunities and challenges. All age cohorts are projected to increase in population by 2040, with those aged 40 to 49 years indicating the next largest increase which comprises of 15,140 persons -- an increase of approximately 56 percent from 2020.

Table 2 – Clay County, Population Projections by Age, 2015-2040

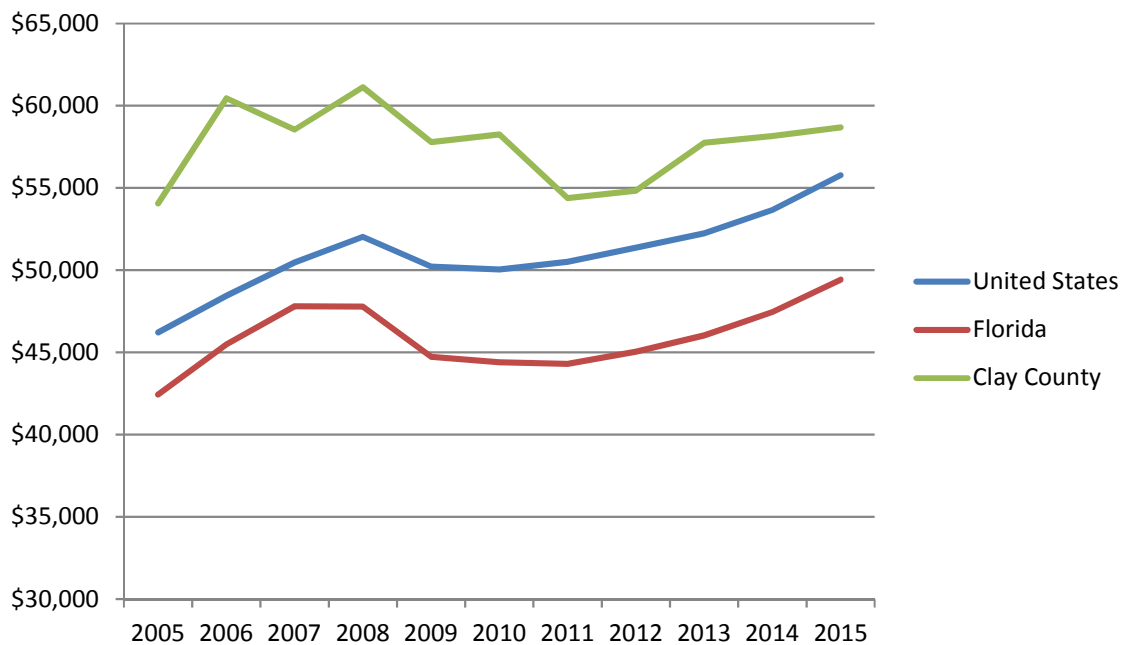
Age	2020	2025	2030	2035	2040
0 to 4 Years	12,717	13,892	14,991	16,025	16,530
5 to 9 Years	14,514	15,569	16,778	17,972	19,098
10 to 14 Years	14,858	16,540	17,558	18,772	19,980
15 to 19 Years	13,878	14,807	16,156	16,971	18,045
20 to 24 Years	12,417	12,731	13,374	14,593	15,314
25 to 29 Years	13,466	13,358	13,574	14,211	15,310
30 to 34 Years	12,342	16,130	15,802	15,865	16,474
35 to 39 Years	13,681	14,938	19,357	18,790	18,806
40 to 44 Years	13,190	15,328	16,427	21,114	20,417
45 to 49 Years	13,934	13,955	15,942	17,066	21,847
50 to 54 Years	13,857	14,197	14,049	16,012	16,942
55 to 59 Years	14,771	14,017	14,232	13,976	15,765
60 to 64 Years	12,716	14,827	13,978	14,057	13,732
65 to 69 Years	10,342	12,513	14,501	13,567	13,650
70 to 74 Years	8,500	9,727	11,601	13,327	12,458
75 or more Years	11,534	16,051	20,504	25,353	30,542
Total Unincorporated County	206,717	228,580	248,824	267,671	284,910

Source: *Population Projections by Age, Sex, Race & Hispanic Origin for Florida and Its Counties 2010-2040*
University of Florida Bureau of Economic and Business Research

Household Income

Since 2005, Clay County's median household income has remained higher than Florida's and the U.S. While it has followed the same general pattern of growth and decline from 2005 to 2015, median household incomes in Clay County appeared to be more negatively impacted during the recession and more variable than Florida and the U.S. Following a peak in 2008 of \$61,130, median household income in Clay County declined for the following three years to a low of \$54,389 in 2011. Recovery since 2012 has been gradual and steady; however, the county has yet to surpass the household income level achieved in 2008. From 2013 to 2015, household income has been almost level with very minimal gains. Overall, median household income from 2005 to 2015 has increased 7.9% in Clay County, 14.1% in Florida and 17.1% in the U.S.

Figure 2 – Median Household Income, 2005-2015



Source: U.S. Census Bureau, American Community Survey (ACS) 1-year estimates, 2005-2015, S1903

Table 3 – Median Household Income in Dollars, 2005-2015

	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015
United States	46,212	48,451	50,470	52,029	50,221	50,046	50,502	51,371	52,250	53,657	55,775
Florida	42,433	45,495	47,804	47,778	44,736	44,409	44,299	45,040	46,036	47,463	49,426
Clay County	54,055	60,450	58,555	61,130	57,783	58,263	54,389	54,827	57,757	58,153	58,676

Source: U.S. Census Bureau, American Community Survey (ACS) 1-year estimates, Median Income, S1903

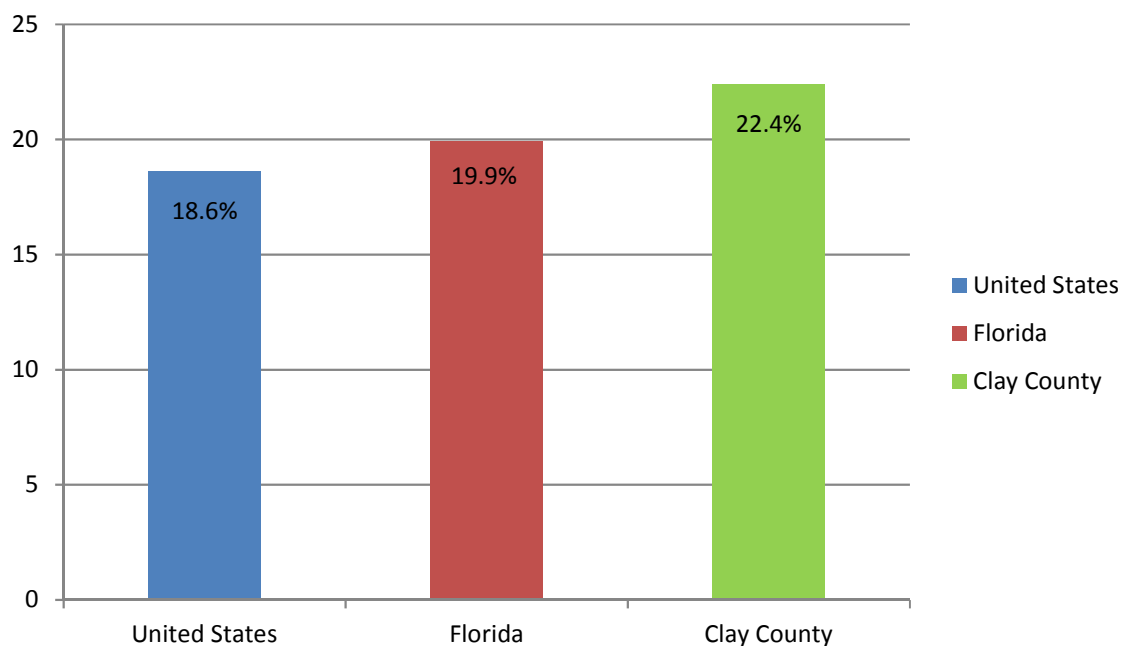
Sources of Household Income

Household incomes can come from a variety of sources including wages and earnings from employment, monies from investments (e.g., interest, dividends or rent), retirement income, and through government social programs. Analyzing the sources of income for Clay County residents can help us better understand the different sources of income that contribute to the local economy.

Retirement Income

Relative to Clay County's demographic composition, the share of households receiving retirement income was slightly higher in 2015 with 22.4% compared to 19.9% and 18.6% for Florida and the U.S., respectively. Also, the mean retirement income for households in Clay County (\$25,388) was similar to Florida (\$25,845) and the U.S. (\$24,945).

Figure 3 – Percent of Households with Retirement Income, 2015

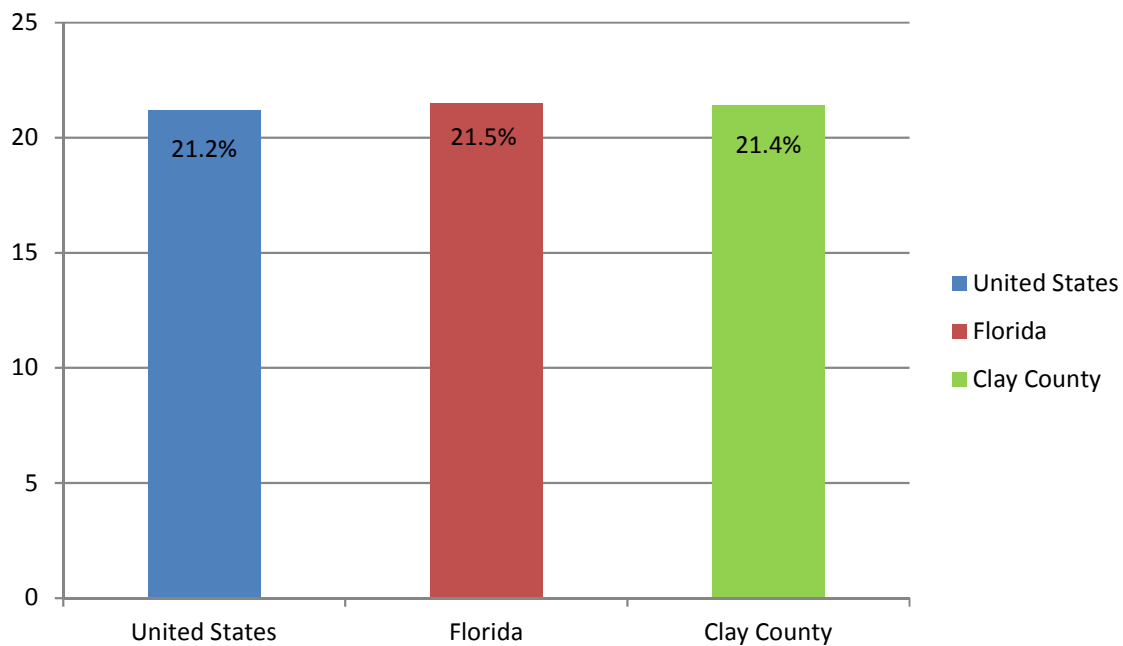


Source: U.S. Census Bureau, American Community Survey (ACS) 1-year estimates, 2015, S1902

Income from Interest, Dividends or Rental

In 2015, the mean household income from interest, dividends and rent was significantly lower in Clay County (\$12,809) when compared to Florida (\$26,377) and the U.S. (\$20,129). However, as a percentage of total household income in Clay County, the income derived from interest, dividends and rent income is comparable with Florida and the U.S., which lends support to the character of households in Clay County being younger in composition than in Florida and U.S. and not yet in a financial position to earn significant income from these sources.

Figure 4 – Percent of Households with Income from Interest, Dividends, or Net Rental, 2015



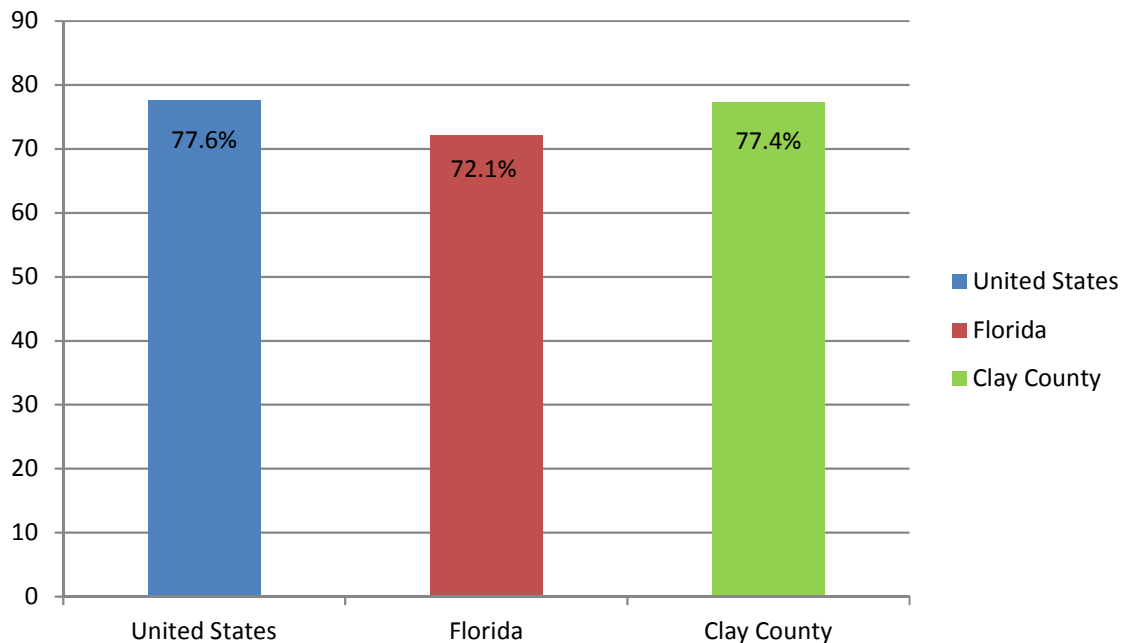
Source: U.S. Census Bureau, American Community Survey (ACS) 1-year estimates, 2015, S1902

Income from Earnings

Clay County's household income from earnings is impacting growth of the total income. In 2015, about 77.4% of the households in Clay County received income from earnings, compared to 72.1% in Florida and 77.6% in the U.S. While a higher proportion of households in Clay County obtain income from earnings, the actual amount (\$68,739) is lower than the income from earnings of households in the U.S. (\$79,909) and slightly less than household income from earnings in Florida (\$70,475).

As depicted in the data, the growth in household income from earnings in Clay County has lagged Florida and the U.S. Mean income earnings for households in Clay County increased only 7.9% from 2005 to 2015, compared to 15.8% for Florida and 16.4% for the U.S. over the same period. Meanwhile, earnings from the working population, whose lower wages are experiencing very little growth compared to the state and the nation, are suppressing overall income growth in Clay County.

Figure 5 – Percent of Households with Income from Earnings, 2015



Source: U.S. Census Bureau, American Community Survey (ACS) 1-year estimates, 2015, S1902

Table 4 – Mean Household Earnings, 2005 and 2015

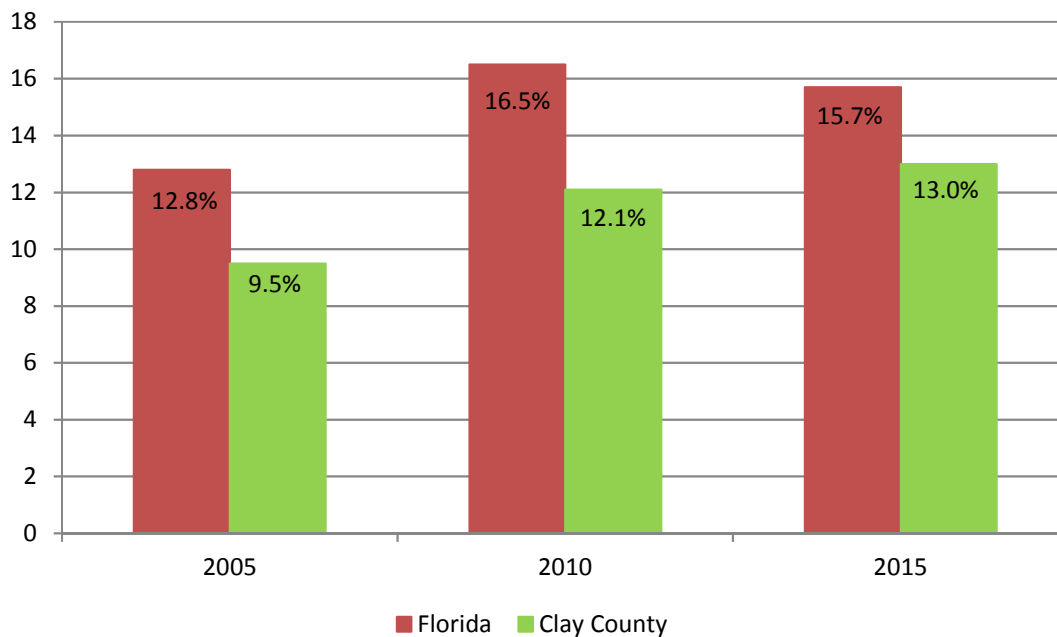
	2005	2015	Change 2005-2015
United States	\$66,834	\$79,909	16.4%
Florida	\$59,336	\$70,475	15.8%
Clay County	\$63,289	\$68,739	7.9%

Source: U.S. Census Bureau, American Community Survey (ACS) 1-year estimates, 2005 and 2015, S1902

Poverty Status

The official federal poverty measures are primarily used to determine eligibility for federal and state programs. Poverty status are also used as a measure of a community's well-being relative to other communities or states. The term "in poverty" refers to those households or individuals below the poverty threshold. The poverty status of a community has broad implications to its overall health as well as social and economic opportunities for its residents. As depicted in Figure 6, poverty levels in Clay County remained below that of the State of Florida between 2005 and 2015. However, the percent of the population in poverty in Clay County has increased.

Figure 6 – Percent of Population Below Poverty Level, 2005, 2010 & 2015



Source: U.S. Census Bureau, American Community Survey (ACS) 1-year estimates, 2015, S1902

Education

With almost 90% of its residents aged 25 and over with at least a high school diploma and nearly one out of every four adults with a Bachelor's degree or higher, Clay County's population is considered well educated (U.S. Census Bureau, ACS 2015 1-year estimates, DP02). In 2015, Clay County exceeded the US and State of Florida for its percentage of the population aged 25 and over that are high school graduates. The schools, colleges and technical institutions position the county for the continued quality educational achievement of its residents. Information presented in this section describes the current situation which indicates that although more actual residents are obtaining Bachelor degrees in Clay County, there is a decrease in the percentage of the population attaining higher education degrees, specifically the population aged 25 to 34 years old when compared to the US and State of Florida.

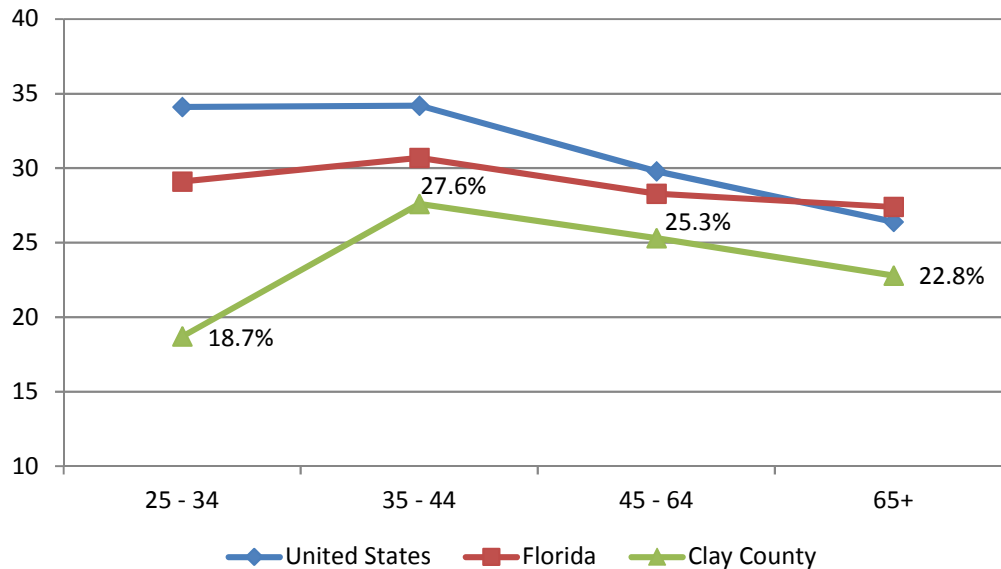
Clay County School District

Based on measures of student performance, in 2016 the Florida Department of Education (FLDE) graded Clay County as a "B" district. The primary and secondary educational needs of the county's population are met in a variety of school options, both public and private. Public school choices (also consisting of tuition-free charter schools and online/virtual education platforms) include a nationally recognized military academy and schools with specialized curricula based on the arts, physical activity/health, and other emphases.

Educational Attainment

The primary working age populations, particularly the 35 to 44-year-old group, are the most educated in Clay County. This is a similar situation when compared to the US and the State of Florida. Clay County also follows a similar trend to the US and Florida, which shows that educational attainment decreases with age. In 2015, Clay County's population aged 25 to 34 years old were well below the US and Florida metric regarding the attainment of a Bachelor's degree or higher. Overall, the percentage of Clay County's population aged 25 and over with a Bachelor's degree or higher was 23.7 percent in 2015, while in the US and Florida the percentage was 30.6 percent and 28.2 percent respectively.

Figure 7 – Percent Population Aged 25 and Over with a Bachelor's Degree or Higher, 2015

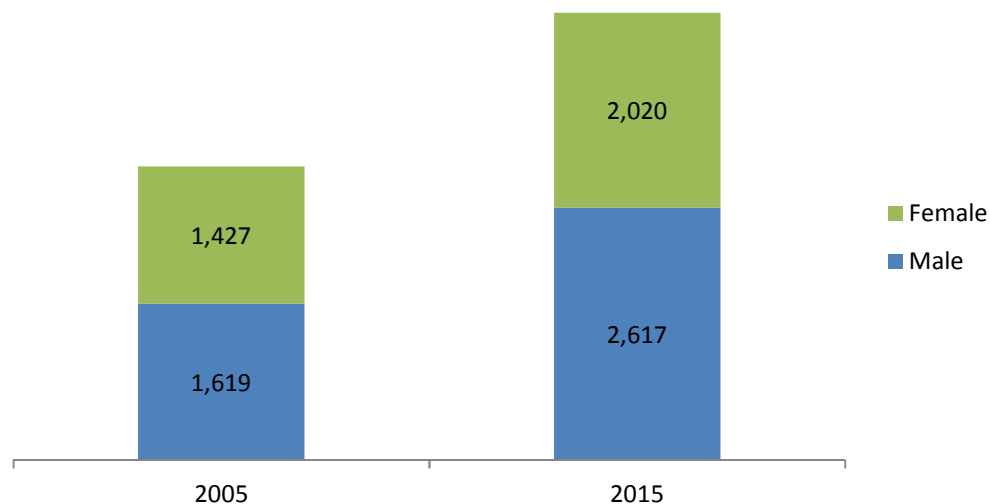


Source: U.S. Census Bureau, American Community Survey (ACS) 1-year estimates, 2015, B15001

Bachelor Degrees

The percentage of young adults aged 25 to 34 years old in Clay County who have earned a Bachelor's degree has decreased from 21.1% in 2005 to 18.4% in 2015. Although the percentage of young adults with a Bachelor's degree has declined, the actual number of young adults with a Bachelor's degree in Clay County has increased by 34.3% from 2005 to 2015. According to the American Community Survey (ACS), in 2015 fewer than 4,700 adults aged 25 to 34 in Clay County had a Bachelor's degree, while in 2005, it was slightly over 3,000 adults.

Figure 8 – Population Aged 25-34 with a Bachelor's Degree, 2005 & 2015



Source: U.S. Census Bureau, American Community Survey (ACS) 1-year estimates, 2005 & 2015, B15001

Education and Workforce Development

Clay County has several post-secondary educational resources available for personal and professional enrichment. St. Johns River State College offers a wide range of programs from professional certification to Bachelor's degrees. Embry-Riddle Aeronautical University recently opened a satellite campus in Fleming Island which offers a range of Bachelor and higher degree courses. Fortis College in Orange Park provides career education and training for the medical and dental fields. Everest University in Orange Park focuses on preparing students for the workplace through hands-on training, and a variety of degree programs.

In addition, there are many college and technical education facilities to serve Clay County's adult population which are located throughout the region as identified below.

Major Regional Educational Institutions

University of North Florida, Jacksonville
University of Florida, Gainesville
First Coast Technical College, St. Augustine
Flagler College, St. Augustine
Florida State College at Jacksonville
Jacksonville University

Alternative Educational Credentials

Data on post-secondary education often focuses on the attainment of college degrees as described above, however, professional certifications, trade apprenticeships and technical training should also be recognized as contributing to a more educated and skilled workforce. The U.S. Census Bureau is beginning to track "alternative educational credentials" and has found that about 25% of adults in the U.S. have a professional certification, license, or educational certificate and that there is a clear labor market value in these credentials, particularly for those with low levels of education (i.e., below the bachelor's degree level). (Measuring Alternative Educational Credentials: 2012, U.S. Census Bureau, Survey of Income and Program Participation, 2009 Panel, Wave 13). There is no data available for Clay County at this time for alternative educational credentials.

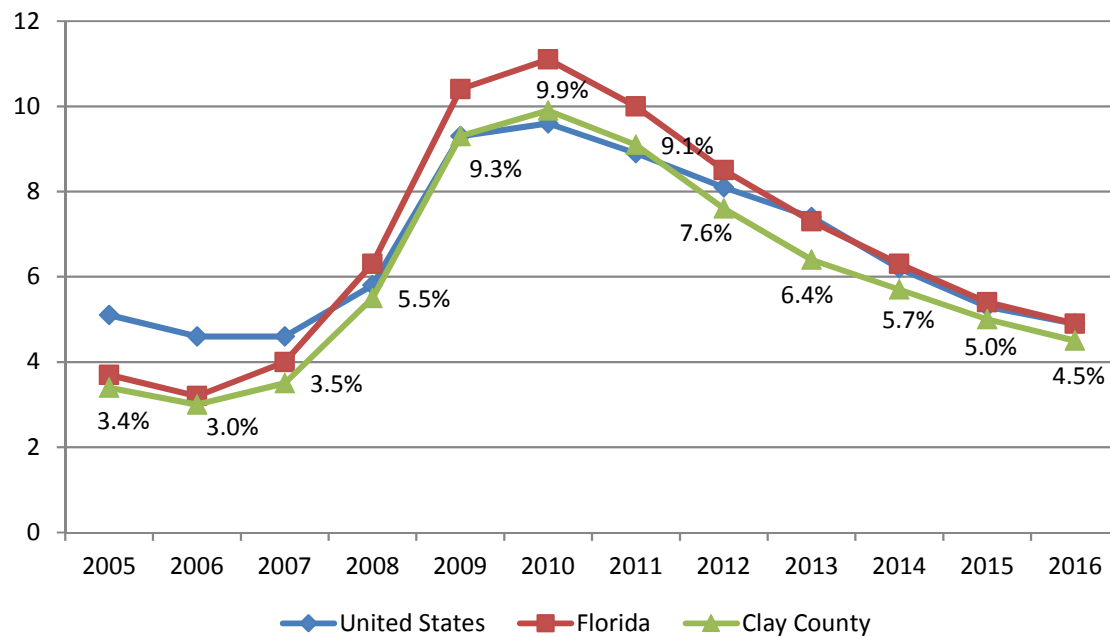
Employment and Industry

Unemployment Trends

Prior to the Great Recession, Clay County enjoyed relatively low unemployment rates. As a result of its economy dominated by construction and service-based industries, the county was more sensitive to the economic downturn and experienced rates of unemployment similar to the State of Florida and the US. At its worst, the unemployment rate in Clay County reached nearly 10%.

Since its peak in 2010, the recovery period has been marked by consistent decline in the unemployment rate and Clay County is now on par with Florida and US rates, but has yet to return to pre-recession levels.

Figure 9 – Clay County, Florida and U.S. Percentage Annual Average Unemployment Rate, 2005-2016



Source: Local Area Unemployment Statistics (LAUS), 2005-2016, <http://floridajobs.org>

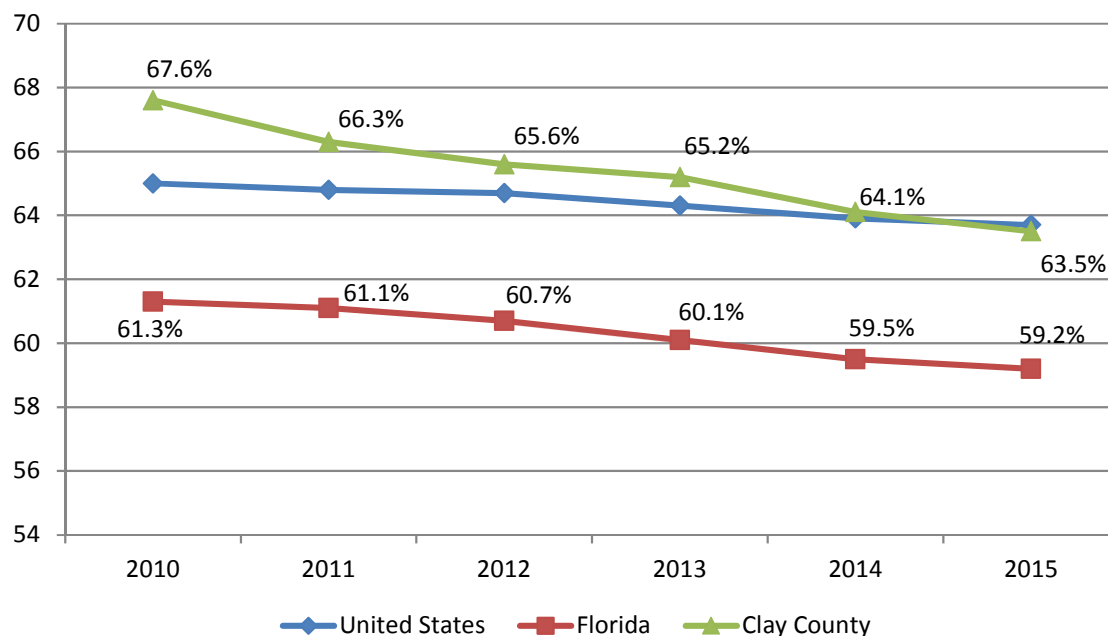
Labor Force Participation

The labor force includes those persons who are currently employed as well as those that may be unemployed but looking for work. Persons not included in the labor force would be those that are retired, going to school or otherwise not seeking employment perhaps due to a disability or child/elder care responsibilities, transportation issues or are discouraged and no longer seeking employment. The labor force participation rate measures the percent of the labor force compared to the total civilian non-institutionalized population, typically aged 16 and over. Labor Force conditions may reflect the general level of economic activity in the community. A growing workforce is an asset to economic development activities such as supporting business retention and expansion efforts, recruiting new businesses to the community, and providing employment opportunities for County-wide residents.

In 2015, 63.5% of Clay County's population aged 16 and over participated in the labor force, which is higher than Florida (59.2%) and similar to the U.S. (63.7%). Labor force participation rates since 2010 indicate that while the labor force expanded in Clay County as the economy was growing, the rate has been declining slowly from 67.6%. There are several factors that may contribute to this decline. Clay County's aging population results in a greater share of the population entering retirement while the share of the working age population decreases. This trend will likely be intensified as the baby boom cohort is entering retirement age. Additionally, during an economic downturn and the recovery which follows, young adults may choose to stay in school longer rather than begin actively searching for employment; older adults may choose to return to school to enhance their job skills and marketability or pursue new career paths to adjust to a changing economy.

These trends, among others, are resulting in the gradual decline in Clay County's labor force which could hinder the county's recovery and future economic growth. A declining labor force can be perceived negatively by employers as having a limited availability of local workers. Moreover, when segments of the local workforce are becoming less educated in Clay County (in particular, adults under age 35), it may become unfavorable for employers who desire to expand or relocate in an area.

Figure 10 – Participation Rates as Percentage of Population 16 and Over in the Labor Force, 2010-2015



Source: U.S. Census Bureau, American Community Survey (ACS) 5-year estimates, 2010-2015, DPO3

Industry Employment

In Clay County, the industries with the most employees include Education, Health Care and Social Assistance, Retail Trade and Professional Food Services. These three industries account for less than half of all jobs in Clay County. The following table ranks industries in Clay County by employment size, in addition to their growth from 2010 to 2015. As depicted, there are many industries which are still adjusting to the post-recession economy and continue to lose employment. Monitoring changes in the local employment numbers is critical to projecting the need for new urban infrastructure in the community.

Table 5 – Clay County Employment by Industry 16 and Over, 2010 & 2015

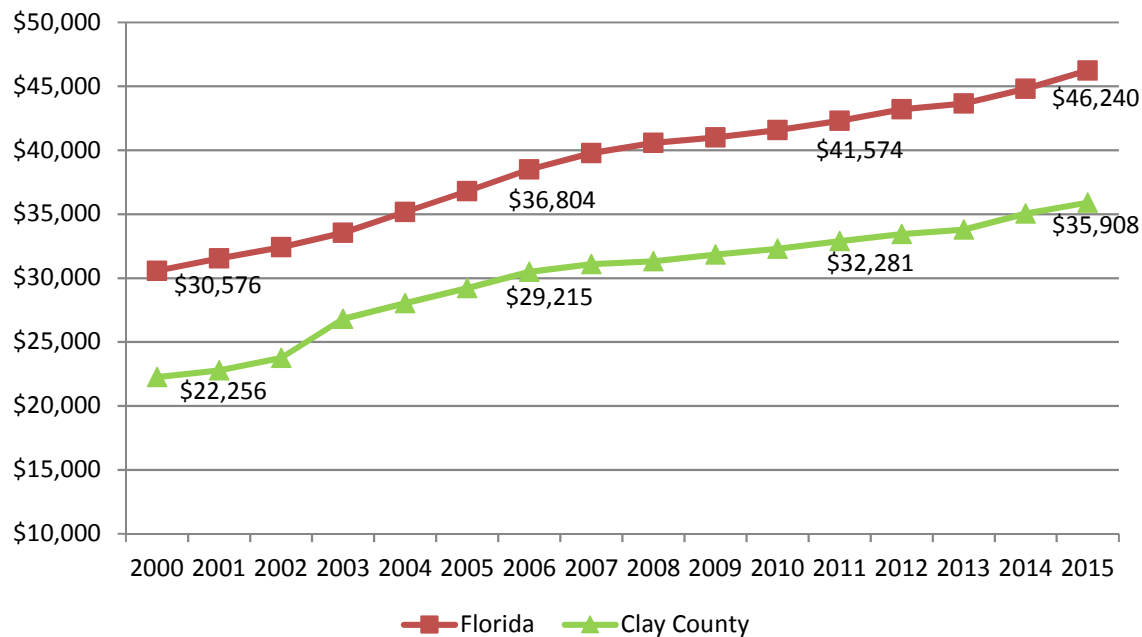
Industry	Employment 2015	# Change 2010-2015	% Change 2010-2015
Educational services, health care & social assistance	19,156	2,491	14.9%
Retail trade	11,628	503	4.5%
Professional, scientific & management services	8,963	10	0.1%
Arts, entertainment & recreation	7,570	618	8.9%
Finance and insurance	7,334	-902	-11.0%
Construction	6,524	-955	-12.8%
Transportation/warehouse	6,107	-755	-11.0%
Public administration	5,867	-269	-4.4%
Manufacturing	4,367	-801	-15.5%
Other services	4,326	414	10.6%
Wholesale trade	2,605	50	2.0%
Information	1,552	-104	-6.3%
Agriculture, forestry, fishing/hunting & mining	375	-187	-33.3%
Total	86,374	113	0.1%

Source: U.S. Census Bureau, American Community Survey (ACS) 5-year estimates, 2010 & 2015, DPO3

Employment Wages

Wage levels reflect conditions of the local economy and indicate the health of local companies and the economic well-being of workers. Average annual wages in Clay County continue to increase as depicted in Figure 11. However, when compared with the State of Florida, Clay County average annual wages remain lower. In 2015, Clay County's average annual wage amounted to \$35,908 compared with \$46,240 for the State of Florida, a difference of 29 percent.

Figure 11 – Average Annual Wages, All Industries, 2000-2015

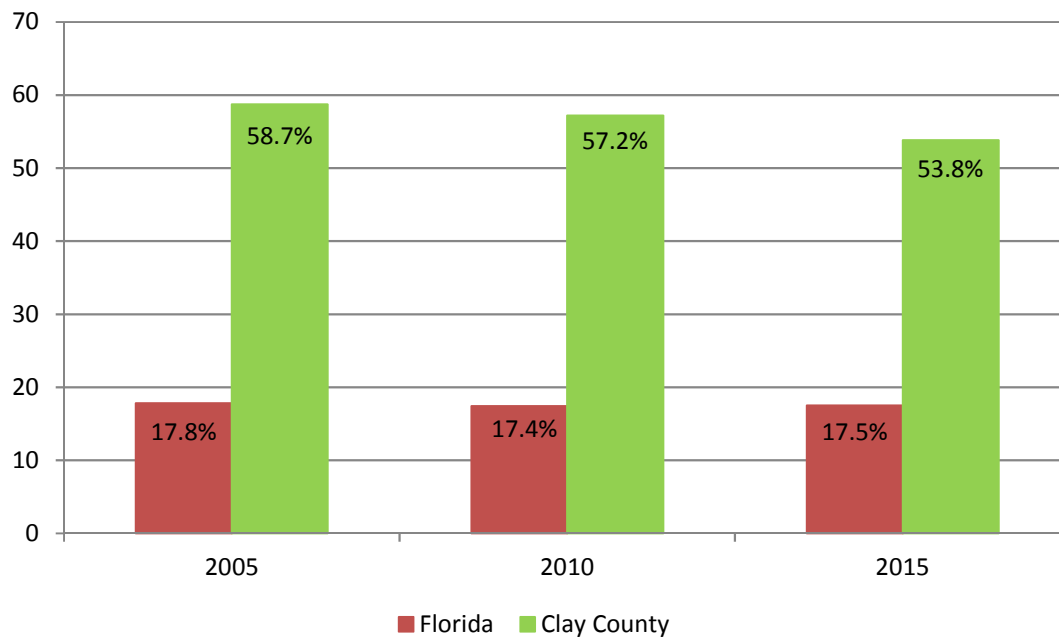


Source: Florida Agency for Workforce Innovation, Labor Market Statistics Center, Quarterly Census of Employment and Wages Program (QCEW), 2000-2015

Place of Work and Commute Time

The percentage of residents working outside of Clay County continues to be significant. As depicted in Figure 12, in 2005, almost 59 percent of the County's residents worked outside of Clay County. For the State of Florida, the percentage of residents working outside of their county of residence is approximately 18 percent. In 2015, the percentage of residents working outside of Clay County had decreased to approximately 54 percent. Alternatively, there are a significant number of workers who reside in other counties yet work in Clay County. This labor inflow/outflow creates an imbalance of workers which is a unique characteristic to Clay County and the region.

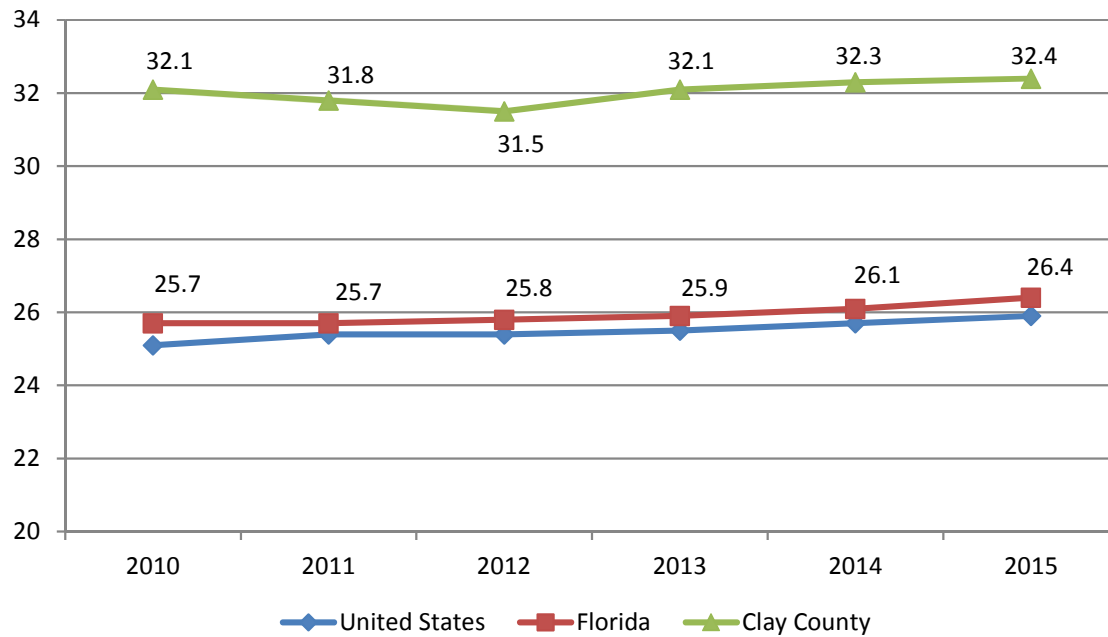
Figure 12 – Percent Working Outside County of Residence, 2005, 2010 & 2015



Source: U.S. Census Bureau, American Community Survey (ACS) 1-year estimates, 2005, 2010 & 2015, S0801

The commute time of Clay County workers also continues to be significant. As depicted in Figure 13, in 2010, the commute time to work for the County's residents amounted to 32.1 minutes. For the State of Florida, the commute time for workers amounted to 25.7 minutes, which is similar for the commute time of US workers. The commute time to work in 2015 has not changed significantly from 2010 and was 32.4 minutes. The commute time for Clay County workers is approximately 22 percent higher than workers throughout the State of Florida.

Figure 13 – Commuting to Work in Minutes (Mean), 2010-2015



Source: U.S. Census Bureau, American Community Survey (ACS) 5-year estimates, 2010-2015, DPO3

Key Industries

The Clay County Economic Development Corporation (Clay EDC) performs economic development activities, and has a Contract for Services with the Clay County Board of County Commissioners. The purpose of Clay EDC is to support the creation of quality jobs through development of a favorable business climate with the overall goal to diversify the economy within Clay County. The Clay EDC has an agreement with the Clay County Board of Commissioners to fund participation in JAXUSA, the Regional Economic Development Partnership, which markets Northeast Florida nationally and internationally to new business opportunities.

Clay EDC oversees the economic development planning function for the County. Clay EDC partners with the County and other public and private entities. Clay County's economy is powered by a balanced mix of traditional and emerging industries. Key industries are pivotal to the growth of an economy. Companies in a key industry are often major employers in the local economy and typically have emerged as a result of strategic factors such as infrastructure, business climate, location, workforce or clusters of similar industries which contribute to their success and growth. Clay EDC has identified major key industries for Clay County which are identified below in **Table 6**. Industries which are not identified as "key" remain critical to the continued growth and diversity of the local economy.

Table 6 – Clay EDC Key Industries

Industries
Healthcare and Life Sciences
Advanced and Manufacturing
Aviation and Defense
Logistics and Distribution
Information Technology
Business Support Services

Source: Clay EDC, <http://clayedc.betterchamber.com> (website), June 2017

C. Major 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 commented 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 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.

Residents and businesses want to reside in communities that are able to maintain levels of service for public infrastructure and services that provide for a high quality of life. The provision of adequate infrastructure is critical to support the community's existing needs and accommodate an expanding economy. How well a community funds its infrastructure needs can serve as a platform to accommodate future growth and development. Communities which lag in the provision of capital expenditures for infrastructure investment are not able to attract the quality growth and development it desires. Infrastructure planning and funding to accommodate new growth and development is closely related to the community's economic development objectives. For this reason, the funding of infrastructure and the development of financing alternatives to accommodate new community development is a fundamental component of the Economic Development Element of the 2040 Comprehensive Plan for Clay County.

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.

A multi-modal transportation network (i.e., transit, vehicles, bicycles and pedestrians etc.) which provides commuter modal choice and regional interconnectivity is critical to a growing community and for safe and efficient circulation. The provision of adequate transportation infrastructure is critical to support the community's existing needs well as serve as a platform to accommodate future growth and development. Modal choice such as pedestrian and bicycle facilities are key components in the provision of quality of life for a community. Transportation funding to accommodate new growth and development is closely related to achieving a community's economic development objectives. Transportation systems connect workers to businesses and connect businesses to regions and international markets. For this reason, a comprehensive transportation network will also facilitate economic development and is a

fundamental component of the Economic Development Element of the 2040 Comprehensive Plan for Clay County.

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.

A balanced economy is one of the critical components for a community's ability to achieve a sustainable natural, built and human environment. Currently, the Clay County economy is not balanced due to the significant outflow of residents who work outside of the County and commute to work. The commute to work for Clay County residents greatly exceeds the commute time for workers throughout Florida and the US. In the long term – this outflow of workers will limit the County's ability to achieve a balanced local economy and the human environment. A similar outflow of residents also occurs with the County's younger population seeking educational, employment and urban lifestyle choices which are not available in Clay County. The ability to retain and attract educated young professionals and entrepreneurs is a key component for supporting the growth and development of the local economy and the human environment. One of Clay County's continuing strengths is its offerings regarding the natural environment and the access provided to its residents. Clay County's urban centers are emerging, yet there are many opportunities for redevelopment and the creation of urban environments which are attractors for residents and businesses. For this reason, a balanced economy and the strengthening of the natural, built and human environments are important elements to facilitate economic development and is a fundamental component of the Economic Development Element of the 2040 Comprehensive Plan for Clay County.

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.

While this issue is an important quality of life factor for Clay County and its residents, there are no Economic Development 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.

While this issue is an important quality of life factor for Clay County and its residents, there are no Economic Development Element objectives or policies that directly relate to or otherwise impact this issue.

D. Matrix for Evaluating Plan Policies

As part of the evaluation of the 2025 Comprehensive Plan's Economic Development Element, the County evaluated 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?

Economic Development	Measurable Target	Defined Terms	Achieved	Major Issue	Statute Requires	Supports Others	Observations
GOAL 1	No	No	Ongoing	Yes	Optional	Yes	Strong support by County and its Economic Development Partners
OBJ 1.1	No	No	Ongoing	Yes	Optional	Yes	No changes identified
POLICY 1.1.1	Yes	No	Ongoing	Yes	Optional	Yes	Minor revisions recommended
POLICY 1.1.2	Yes	No	Ongoing	Yes	Optional	Yes	Minor revisions recommended
POLICY 1.1.3	Yes	No	Ongoing	Yes	Optional	Yes	Implemented by Clay County EDC
POLICY 1.1.4	No	No	Ongoing	Yes	Optional	Yes	No changes identified
OBJ 1.2	No	No	Ongoing	Yes	Optional	Yes	No changes identified
POLICY 1.2.1	No	No	Ongoing	Yes	Optional	Yes	Minor revisions recommended
POLICY 1.2.2	No	No	Ongoing	Yes	Optional	Yes	No changes identified
POLICY 1.2.3	No	No	Ongoing	Yes	Optional	Yes	No changes identified
POLICY 1.2.4	No	No	Ongoing	Yes	Optional	Yes	No changes identified
OBJ 1.3	No	No	Ongoing	Yes	Optional	Yes	Minor revisions recommended
POLICY 1.3.1	Yes	Yes	Ongoing	Yes	Optional	Yes	Minor revisions recommended
POLICY 1.3.2	No	No	Ongoing	Yes	Optional	Yes	Minor revisions recommended
POLICY 1.3.3	No	No	Ongoing	Yes	Optional	Yes	Revise. Relocate Policy to New OBJ
POLICY 1.3.4	No	No	Ongoing	Yes	Optional	Yes	Minor revisions recommended
POLICY 1.3.5	No	No	Ongoing	Yes	Optional	Yes	Minor revisions recommended
OBJ 1.4	Yes	No	Ongoing	Yes	Optional	Yes	No changes identified
POLICY 1.4.1	No	No	Ongoing	Yes	Optional	Yes	No changes identified
POLICY 1.4.2	No	No	Ongoing	Yes	Optional	Yes	No changes identified.
POLICY 1.4.3	Yes	No	Ongoing	Yes	Optional	Yes	No changes identified
POLICY 1.4.4	No	No	Ongoing	Yes	Optional	Yes	No changes identified
POLICY 1.4.5	No	No	Ongoing	Yes	Optional	Yes	No changes identified
POLICY 1.4.6	No	No	Ongoing	Yes	Optional	Yes	No changes identified
POLICY 1.4.7	No	No	Ongoing	Yes	Optional	Yes	No changes identified
OBJ 1.5	No	No	Ongoing	Yes	Optional	Yes	Minor revisions recommended

Economic Development	Measurable Target	Defined Terms	Achieved	Major Issue	Statute Requires	Supports Others	Observations
POLICY 1.5.1	No	No	Ongoing	Yes	Optional	Yes	Minor revisions recommended
POLICY 1.5.2	No	No	Ongoing	Yes	Optional	Yes	No changes identified
POLICY 1.5.3	No	No	Ongoing	Yes	Optional	Yes	No changes identified
POLICY 1.5.4	No	No	Ongoing	Yes	Optional	Yes	No changes identified
POLICY 1.5.5	No	No	Ongoing	Yes	Optional	Yes	No changes identified
POLICY 1.5.6	No	No	Ongoing	Yes	Optional	Yes	No changes identified
POLICY 1.5.7	No	No	Ongoing	Yes	Optional	Yes	Minor revisions recommended
OBJ 1.6	No	No	Ongoing	Yes	Optional	Yes	No changes identified
POLICY 1.6.1	Yes	No	Ongoing	Yes	Optional	Yes	Minor revisions recommended
POLICY 1.6.2	Yes	No	Ongoing	Yes	Optional	Yes	Minor revisions recommended
POLICY 1.6.3	Yes	No	Ongoing	Yes	Optional	Yes	No changes identified
POLICY 1.6.4	No	No	Ongoing	Yes	Optional	Yes	No changes identified
POLICY 1.6.5	No	No	Ongoing	Yes	Optional	Yes	No changes identified

E. Assessment of Changes to Florida Statutes

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

The Economic Development Element is an optional component of the Clay County 2040 Comprehensive Plan. While there are a number statutory changes that have occurred since 2009, none of these changes directly impact the Goals, Objectives and Policies of the Economic Development Element.

F. Conclusion and Proposed Revisions

The Comprehensive Plan is substantively up-to-date and the County has done a good job of implementing its Comprehensive Plan. Most necessary amendments are those as required by changes in State law, or to provide greater emphasis on issues of particular importance to Clay County.

- Add the name of the Element to all GOPs to better differentiate among others in the Comprehensive Plan.
- There are a number of minor corrections to Goal, Objectives and Policies in the Element to update specific terms, references, phrases or entities which are now defined or have changed since the last modification to the Element.
- There is a new goal with supporting objectives and policies that are proposed for inclusion to the Element. The new goal, objectives and policies (GOPs) provide further guidance and aim strengthen the County's decision-making process toward accommodating growth and development which positively impacts economic development. The proposed GOPs amendments implement strategies and recommendations developed by the Clay County Economic Development Corporation (EDC) as identified in the Clay County Economic Development Plan completed in March 2016. The proposed GOPs to the Economic Development Element are listed below:
 - Support land planning related to economic development efforts proximate to the First Coast Expressway
 - Support Workforce Development, Training and Programs
 - Support Workforce Retention
 - Support Innovation and Entrepreneurship

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

Proposed Amendment to EDE Goal 1

To indicate the County's intention to grow the local economy:

EDE Goal 1

Clay County will achieve and maintain a diversified and stable growing economy by providing a positive business climate that assures maximum employment opportunities while maintaining the quality of life and quality of the environment.

Proposed Amendment to EDE Policy 1.1.1

To clarify the need for partnering efforts regarding economic development efforts:

EDE Policy 1.1.1

Clay County shall partner with private sector agencies ~~continue to support the Chamber and the Authority~~ in conducting a coordinated economic development program.

Proposed Amendment to EDE Policy 1.1.2

To clarify that the Clay County EDC leads the County's economic development efforts:

EDE Policy 1.1.2

Clay County shall maintain public-private partnerships through its continued support of the Clay County Economic Development Corporation Chamber in an effort to provide a sufficient and stable base for business, governmental, and financial support for the County's economic development efforts.

Proposed Amendment to EDE Policy 1.1.3

To clarify that the Clay County EDC leads the County's economic development efforts and to update the term "primary" industry to "basic" industry and add "key" to reference the County's targeted industries for consistency with Clay County EDC efforts :

EDE Policy 1.1.3

Clay County shall work with the Clay County Economic Development Corporation Chamber and encourage active development and implementation of programs that promote a diversified economy for Clay County through the following: attraction and retention of targeted/key businesses and basic ~~primary~~ industries, creation of public private partnerships, and the education of the community on the value of economic development.

Proposed Amendment to EDE Policy 1.2.1

To update the term "primary" industry to "basic" industry and add "key" to reference the County's targeted industries for consistency with Clay County EDC efforts:

EDE Policy 1.2.1

Clay County shall prioritize the land use planning of sites meeting the locational requirements of identified targeted/key industries and basic ~~primary~~ industries uses in appropriate and compatible locations and recognize this priority during the review of plan amendments, rezoning requests, site plan approvals and permitting processes.

Proposed New EDE Policy

To identify the importance and role of the First Coast Expressway in achieving the County's long-term transportation and economic development objectives:

EDE Policy 1.2.5

Clay County shall work with its partners to ensure the First Coast Expressway is strategically incorporated into the County's Future Land Use planning framework to ensure the infrastructure investment is maximized to support long-term transportation and economic development efforts.

Proposed Amendment to EDE Objective 1.3

To update the term "primary" industry to "basic" industry and add "key" to reference the County's targeted industries for consistency with Clay County EDC efforts:

EDE Objective 1.3

Clay County shall promote and encourage the recruitment of new industry as well as the expansion and retention of existing industries that engage in basic ~~primary~~ and/or target/key industry activities which export their goods or services outside the geographic boundaries of the local economy and help to diversify the County's economic base.

Proposed Amendment to EDE Policy 1.3.1

To update the term “primary” industry to “basic” industry and add “key” to reference the County’s targeted industries for consistency with Clay County EDC efforts:

EDE Policy 1.3.1

Clay County shall support efforts to formulate an economic development plan to assist in the attraction and location of targeted/key businesses and basic ~~primary~~ industries to facilitate the diversification of the County’s economic base.

Proposed Amendment to EDE Policy 1.3.2

To update the term “primary” industry to “basic” industry and add “key” to reference the County’s targeted industries for consistency with Clay County EDC efforts:

EDE Policy 1.3.2

Clay County shall evaluate and propose or revise as necessary, Comprehensive Plan policies to create land use for the location of targeted/key businesses and basic ~~primary~~ industries to expand the economic capacity of the County.

Proposed Amendment to EDE Policy 1.3.3

To update the term “primary” industry to “basic” industry and add “key” to reference the County’s targeted industries for consistency with Clay County EDC efforts:

EDE Policy 1.3.3

Clay County shall promote economic diversity and growth by creating an environment which encourages entrepreneurs to engage in basic ~~primary~~ business and target/key industry activities.

Proposed Amendment to EDE Policy 1.5.1

To clarify the County’s ongoing commitment to funding countywide economic development programs:

EDE Policy 1.5.1

Clay County shall maintain ~~identify~~ dedicated funding for countywide economic development ~~implementation~~ programs which utilize a range of public revenues, grants and private sector contributions

Proposed Amendment to EDE Policy 1.5.7

To update the term “primary” industry to “basic” industry and add “key” to reference the County’s targeted industries for consistency with Clay County EDC efforts:

EDE Policy 1.5.7

Clay County shall investigate ways to implement a strategy to provide financial or other incentives to assist in the expansion of business and industry, which may includes the mitigation and/or delay of impact fees or similar development costs for qualifying targeted/key businesses and basic ~~primary~~ industries.

Proposed Amendment to EDE Policy 1.6.1

To update the term “primary” industry to “basic” industry and add “key” to reference the County’s targeted industries for consistency with Clay County EDC efforts:

EDE Policy 1.6.1

Clay County shall endeavor to streamline the review and permitting process for targeted/key businesses and basic primary industries and develop clearly defined development guidelines that will promote the accomplishment of the goal, objectives and policies of this Element

Proposed Amendment to EDE Policy 1.6.2

Minor correction to revise procedures to procedure and to update the term “primary” industry to “basic” industry and add “key” to reference the County’s targeted industries for consistency with Clay County EDC efforts:

EDE Policy 1.6.2

Clay County shall employ the use of priority review and permitting procedures, identify a liaison to assist or other internal processes that may be necessary to expedite site review, permitting, concurrency, and inspection of targeted/key businesses and basic primary industries and the expansion/relocation of existing industries.

Proposed New EDE Goal

A new Goal to identify efforts needed to attract and develop the County’s workforce:

EDE Goal 2

Partner in a community-wide effort focused on attracting, developing and retaining 21st-century workforce to support targeted/key industries and entrepreneurship.

Proposed New EDE Objective

To provide direction for the County to support workforce development efforts for local employers:

EDE Objective 2.1

Support efforts to develop a highly skilled and globally-competitive workforce to meet the needs of employers in Clay County.

Proposed New EDE Policy

To provide direction for the County to support workforce education and training efforts:

EDE Policy 2.1.1

Champion the development of education curricula, training facilities and programs that increase appropriately credentialed employees.

Proposed New EDE Policy

To promote the clustering of educational facilities and employment centers to support workforce development:

EDE Policy 2.1.2

Encourage the clustering or co-locating of high schools, vocational schools and colleges or universities near employment centers to better connect students with potential employment opportunities.

Proposed New EDE Objective

To identify the need to support policies and programs to attract a segment of the workforce to live and work in Clay County:

EDE Objective 2.2

Support practices that encourage the attraction and development of a workforce that is younger, entrepreneurial and diverse.

Proposed New EDE Policy

To implement the objective through policy action that aim to encourage placemaking in the County to attract a younger workforce who are seeking an urban lifestyle:

EDE Policy 2.2.1

Support the implementation of regulations that focus on the development of diverse housing options, multi-modal transportation, employment centers with enhanced social amenities that support placemaking in the County.

Proposed New EDE Policy

To implement the objective through policy actions that aim to encourage placemaking in the County to attract a younger workforce who are seeking an urban lifestyle:

EDE Policy 2.2.2

Expand housing options that support the local workforce by planning new urban residential development near employment centers.

Proposed New EDE Policy

To implement the objective through policy actions that aim to encourage placemaking in the County to attract a younger workforce who are seeking an urban lifestyle:

EDE Policy 2.2.3

Focus on competing for millennials by supporting urban and neighborhood infill development and redevelopment including the adaptive reuse of buildings.

Proposed New EDE Policy

To implement the objective through policies that aim to encourage the development of unique work environments to support business start-ups and entrepreneurs in the County:

EDE Policy 2.2.4

Encourage co-work spaces and incubator accelerators to attract business start-ups and entrepreneurs to Clay County.

EXHIBIT J

INTRODUCTION

PURPOSE AND INTENT OF THE ECONOMIC DEVELOPMENT ELEMENT

Chapter 163 of the Florida Statutes (F.S.) provides the statutory authority for local governments to establish an optional Economic Development Element. The Economic Development Element of the County will guide policy to attract economic prosperity, build a strong business environment, achieve long-term structural change and communicate the Clay County opportunity to targeted businesses and basic industries to support a viable local economy.

The Economic Development Element relates to the ability of Clay County to attract and retain basic industries which create higher-wage jobs. Basic industries are defined as the businesses that sell their goods or services outside the geographic boundaries of the local economy. Basic industries, as a result of their out-of-county earnings, create new incomes and additional spending power in the County's economy by importing new financial capital. Furthermore, certain basic industry sectors are prioritized or targeted for economic development business recruitment and retention activities because of their value or contributory nature to the local economy in creating higher skilled, higher wage jobs. Current examples of target/key industries include manufacturing facilities; professional, scientific and technical services such as healthcare and life sciences, finance and insurance services, logistics and distribution, information technology, aviation and defense; and, administrative and business support services as well as corporate headquarters. The list of statewide target industries is maintained by Enterprise Florida, Inc. The list of local/regional target industries is maintained by the Clay County Economic Development Corporation; subsequently, the target/key industries listed are periodically updated and are subject to change.

The County has the responsibility to support and accommodate projected economic development activities while serving the public interest. The County has a key role in guiding land use and infrastructure which supports economic development including transportation, water and sewer, energy resources (i.e., electric and gas); telecommunications, environmental conservation, education, investment incentives, and coordination of economic development efforts.

The Clay County Economic Development Corporation (Clay EDC) performs economic development activities, and has a Contract for Services with the Clay County Board of County Commissioners. The purpose of implementing an economic development program is the creation of quality jobs through the development of a favorable business climate with the overall goal to diversify the economy within Clay County. The Clay EDC has an agreement with the Clay County Board of Commissioners to fund participation in JAX USA, the Regional Economic Development Partnership, which markets Northeast Florida nationally and internationally to new business opportunities.

The Clay County Development Authority (the “Authority”) was created by a special act of the state legislature in 1957 to perform economic development activities. The Authority supports economic development through its ability to issue Industrial Revenue Bonds to assist in the expansion of industrial facilities to support production capacity that promotes quality job growth.

The Clay EDC oversees the completion of studies which contain assessments of the County’s strengths, opportunities, and shortcomings, and also include detailed information on harnessing those strengths and opportunities to support the County’s strategies for economic development activities.

This Element is intended to serve as a broad decision-making guide to direct the physical planning, programming, infrastructure and financial resources to support countywide economic development efforts. The Goal, Objectives and Policies established within this Element reflect the County’s concerns regarding Economic Development, including: the continued diversification of the economy; the offering of County-based incentives as part of a strategy to attract and retain basic industries to the area; that land should be allocated for economic growth; and, that appropriate infrastructure should be available for economic growth.

This Element has been designed to meet the requirements of the Local Government Comprehensive Planning and Land Development Regulation Act and the expectations of the citizens and officials of Clay County.

The Economic Development Element contains two (2) Goals and eight (8) Objective Areas. The Objectives Areas are:

1. Coordinated Economic Development Strategy
2. Allocation of Land Uses supporting Employment Generation
3. New and Existing Businesses and Industries
4. Infrastructure
5. Budgetary Resources and Incentives
6. Development Regulations
7. Workforce Development
8. Attracting Entrepreneurs and Millennials

EDE GOAL 1

Clay County will achieve and maintain a diversified and growing economy by providing a positive business climate that assures maximum employment opportunities while maintaining the quality of life and quality of the environment.

EDE OBJ 1.1

Clay County shall create a local economic development environment through a coordinated strategy that is conducive to the creation and growth of new businesses and the expansion of existing businesses.

EDE POLICY 1.1.1

Clay County shall partner with private sector agencies in conducting a coordinated economic development program.

EDE POLICY 1.1.2

Clay County shall maintain public-private partnerships through its continued support of the Clay County Economic Development Corporation in an effort to provide a sufficient and stable base for business, governmental, and financial support for the County's economic development efforts.

EDE POLICY 1.1.3

Clay County shall work with the Clay County Economic Development Corporation and encourage active development and implementation of programs that promote a diversified economy for Clay County through the following: attraction and retention of targeted/key businesses and basic industries, creation of public private partnerships, and the education of the community on the value of economic development.

EDE POLICY 1.1.4

Clay County shall pursue an integrated approach to economic development that includes tourism, arts and cultural resources, natural resources, education, business, industry and government.

EDE OBJ 1.2

Clay County shall ensure an adequate supply of land uses that support a viable economy and allow for employment generation such as office and industrial uses on the Future Land Use Map (FLUM).

EDE POLICY 1.2.1

Clay County shall prioritize the land use planning of sites meeting the locational requirements of identified targeted/key industries and basic industries uses in appropriate and compatible locations and recognize this priority during the review of plan amendments, rezoning requests, site plan approvals and permitting processes.

EDE POLICY 1.2.2

Clay County shall support employment generating land uses in order to maintain a diverse and fiscally sustainable property tax base.

EDE POLICY 1.2.3

Clay County shall support and encourage planned mixed or multi-use employment centers that may include a functional mix of residential, commercial, office and industrial land uses. The combination of residential and commercial shall be less than 30 percent of the entire floor areas within the designated land uses for employment generation.

EDE POLICY 1.2.4

The County shall encourage office and/or industrial infill and redevelopment activities by establishing strategies, such as mixed-use and increased intensities, as well as support for brownfields redevelopment.

EDE POLICY 1.2.5

Clay County shall work with its partners to ensure the First Coast Expressway is strategically incorporated into the County's Future Land Use planning framework to ensure the infrastructure investment is maximized to support long-term transportation and economic development efforts.

EDE OBJ 1.3

Clay County shall promote and encourage the recruitment of new industry as well as the expansion and retention of existing industries that engage in basic and/or target/key industry activities which export their goods or services outside the geographic boundaries of the local economy and help to diversify the County's economic base.

EDE POLICY 1.3.1

Clay County shall support efforts to formulate an economic development plan to assist in the attraction and location of targeted/key businesses and basic industries to facilitate the diversification of the County's economic base.

EDE POLICY 1.3.2

Clay County shall evaluate and propose or revise as necessary, Comprehensive Plan policies to create land use for the location of targeted/key businesses and basic industries to expand the economic capacity of the County.

EDE POLICY 1.3.3

Clay County shall promote economic diversity and growth by creating an environment which encourages entrepreneurs to engage in basic business and target/key industry activities.

EDE POLICY 1.3.4

Clay County shall provide the opportunity for expansion of existing business and industry and the location of new business and industry by taking action to improve public service, coordination, and regulatory components that increase the County's competitive position in the marketplace.

EDE POLICY 1.3.5

Clay County shall collaborate with the appropriate public and private organizations to implement programs and maintain an environment conducive to business recruitment and retention including business development incentives, transportation resources, utilities such as the extension of sewer and water facilities, labor supply, workforce training, available land and buildings, business support services, local government cooperation and the quantity and quality of educational, recreational and community services.

EDE OBJ 1.4

Clay County shall enhance business development opportunities by ensuring that Clay County develops and maintains a comprehensive, long-range infrastructure program as a key critical component of sustaining current economic growth as well as attracting future economic growth.

EDE POLICY 1.4.1

Clay County shall support and encourage the expansion and development of public services and infrastructure, such as transportation, utilities, and stormwater facilities that complement economic development and business diversification.

EDE POLICY 1.4.2

Clay County shall endeavor to accommodate an appropriate balance of infrastructure investment that supports new and existing office and industrial land uses within the Capital Improvement Element of the Comprehensive Plan.

EDE POLICY 1.4.3

Clay County shall coordinate future growth areas with the Clay County Utility Authority and/or municipal government expansion areas to encourage the expansion of existing and/or development of new businesses and industries.

EDE POLICY 1.4.4

Clay County shall encourage the location of businesses and industries in areas with adequate infrastructure; in areas scheduled for future infrastructure improvements to expand existing capacity as identified in the Capital Improvement Element; or in areas to be provided with the required infrastructure as identified in binding development agreements.

EDE POLICY 1.4.5

Clay County shall coordinate and align the County's Capital Improvements Program and the adopted five-year schedule within the Capital Improvements Element with other infrastructure providers to ensure that infrastructure (such as transportation, sewer and water facilities) is available at the time new economic development opportunities present themselves.

EDE POLICY 1.4.6

Clay County shall support programs designed to ensure the availability of infrastructure needed for advanced telecommunications and high technology targeted business opportunities.

EDE POLICY 1.4.7

Clay County shall encourage utility providers to expand and extend public water and sewer facilities in a timely manner to support county wide economic development objectives and to facilitate the expedient processing of requests for service in projected growth areas.

EDE OBJ 1.5

The County shall support availability and access of public and private financial resources to maintain a sustainable source of support for economic development activities.

EDE POLICY 1.5.1

Clay County shall maintain dedicated funding for countywide economic development programs which utilize a range of public revenues, grants and private sector contributions.

EDE POLICY 1.5.2

Clay County shall support incentive programs that will invest in retaining and creating high wage job opportunities and value-added businesses.

EDE POLICY 1.5.3

Clay County shall encourage and support local revitalization efforts to leverage private investment activities through public investment in community development and infrastructure improvements.

EDE POLICY 1.5.4

Clay County shall support the use of development agreements as a mechanism to fund infrastructure and improvements and expansion of existing facilities.

EDE POLICY 1.5.5

Clay County shall pursue grants and other programs available to expand infrastructure for economic development.

EDE POLICY 1.5.6

Clay County shall encourage the use of innovative methods of financing for infrastructure and services, leveraging resources wherever possible, in order to minimize increases in the current and future tax burden.

EDE POLICY 1.5.7

Clay County shall investigate ways to implement a strategy to provide financial or other incentives to assist in the expansion of business and industry, which may include the mitigation and/or delay of impact fees or similar development costs for qualifying targeted/key businesses and basic industries.

EDE OBJ 1.6

Clay County shall ensure County policies and regulations are consistent with and promote economic development objectives, develop public understanding and support for the economy and its connection to a sustained quality of life, and align community development issues with economic efforts.

EDE POLICY 1.6.1

Clay County shall endeavor to streamline the review and permitting process for targeted/key businesses and basic industries and develop clearly defined development guidelines that will promote the accomplishment of the goal, objectives and policies of this Element.

EDE POLICY 1.6.2

Clay County shall employ the use of priority review and permitting procedures, identify a liaison to assist or other internal processes that may be necessary to expedite site review, permitting, concurrency, and inspection of targeted/key businesses and basic industries and the expansion/relocation of existing industries.

EDE POLICY 1.6.3

Clay County shall use pre-application conferences and preparation and distribution of guides, handouts, and other information on regulatory and permitting procedures affecting economic development to streamline and expedite the application review and permitting process.

EDE POLICY 1.6.4

Clay County shall evaluate and incorporate Land Development Regulations that support the objectives of this Element.

EDE POLICY 1.6.5

Clay County shall avoid duplicating permits, inspections, or functions that overlap state and/or federal permits, inspections or functions. This policy shall not preclude the adoption of County regulations more stringent than state or federal regulations.

EDE GOAL 2

Partner in a community-wide effort focused on attracting, developing and retaining 21st-century workforce to support targeted/key industries and entrepreneurship.

EDE OBJ 2.1

Support efforts to develop a highly skilled and globally-competitive workforce to meet the needs of employers in Clay County.

EDE POLICY 2.1.1

Champion the development of education curricula, training facilities and programs that increase appropriately credentialed employees.

EDE POLICY 2.1.2

Encourage the clustering or co-locating of high schools, vocational schools and colleges or universities near employment centers to better connect students with potential employment opportunities.

EDE OBJ 2.2

Support practices that encourage the attraction and development of a workforce that is younger, entrepreneurial and diverse.

EDE POLICY 2.2.1

Support the implementation of regulations that focus on the development of diverse housing options, multi-modal transportation, employment centers with enhanced social amenities that support placemaking in the County.

EDE POLICY 2.2.2

Expand housing options that support the local workforce by planning new urban residential development near employment centers.

EDE POLICY 2.2.3

Focus on competing for millennials by supporting urban and neighborhood infill development and redevelopment including the adaptive reuse of buildings.

EDE POLICY 2.2.4

Encourage co-work spaces and incubator accelerators to attract business start-ups and entrepreneurs to Clay County.

Definitions

None

PUBLIC SCHOOL FACILITIES ELEMENT SUPPORT DOCUMENT

Data, Inventory & Analysis

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A. Introduction

Public schools are a cornerstone to the well-being and future of a community. Generally, new residential development occurring within the community is the primary contributor to student population growth and has the most significant impact on the public school system. Because of this relationship between residential development and the provision of public schools, coordination among the School District, County, and Local Governments is critical to ensuring that future student growth needs are addressed, and can be accommodated within the public school system.

Recognizing the importance of coordinated planning for public schools, the Florida Legislature enacted legislation amending Sections 163.3180 and 163.3177(12), Florida Statutes (F.S.), first mandating coordinated planning through an interlocal agreement in 2002, then the implementation of public school concurrency through a Public School Facilities Element (PSFE) supported by data and analysis in 2005. These requirements have been addressed in the *Interlocal Agreement for Coordinated Planning, Public Educational Facility Siting and Review and School Concurrency in Clay County* (ILA), which includes school concurrency as a significant component in the data sharing and coordination between the Local Governments and School District. The ILA also provides a process for coordinating and sharing information relating to existing and planned public school facilities, school renovations and closures, requires coordination between Local Governments and the School District when planning infrastructure necessary to support a school, encourages co-location of public uses, and establishes the framework for the regulatory review of new residential development for available school capacity. The ILA has been provided as Attachment A in the Data and Analysis. In 2011, Section 163.3180, F.S. was amended to make school concurrency optional. Clay County chose to continue the implementation of concurrency for public school facilities.

Within Clay County, the participants in school concurrency are Clay County, the School District of Clay County, the Town of Orange Park, the City of Keystone Heights, and the City of Green Cove Springs. The fourth municipality in the County, the Town of Penney Farms, is exempt from school concurrency based on criteria contained in §163.31777(3), F.S. At the time of its comprehensive plan's evaluation and appraisal report, the Town of Penney Farms must determine if it continues to meet the criteria as an exempt Local Government. If the Town continues to meet these criteria, it shall continue to be exempt from the ILA participation requirement. If the School Board proposes a new school in its Five-Year Educational Facilities Plan within the boundaries of an exempt local government, the Local Government is required to comply with the public school concurrency requirements within one year after the school's proposal, pursuant to §163.31777(4), F.S.

Purpose of Report

This Data and Analysis Report was created to detail the methods that have been employed to support the coordinated school planning and school concurrency program to ensure that public school capacity needs are met within Clay County. This data and related analysis will be used to plan, anticipate growth and identify revenue requirements and sources. It verifies that a financially feasible school concurrency program which will achieve and maintain an adopted level of service for schools can be established in Clay County.

This Report also provides participating Local Governments within Clay County the required data and analysis necessary to adopt a Public School Facilities Element (PSFE), consistent with the amended ILA adopted by the School Board and Local Governments pursuant to §163.31777, F.S., and addresses:

- Coordinated planning issues
- Demographic profile
- Land development patterns
- School utilization
- Public infrastructure
- Co-location of facilities
- Level of service standards
- Financial feasibility

B. Coordinated Planning of School Facilities

One of the objectives of the Public School Facilities Element is to coordinate the timing, location and infrastructure necessary to support public schools and provide the capacity needed to accommodate student growth. This includes the coordination of the location of public schools with the future land use map, or map series, of the relevant jurisdiction to ensure that existing and proposed school facilities are located consistent with the existing and proposed residential areas they serve and are proximate to appropriate existing and future land uses. It also addresses coordination of the annual review of school enrollment and population projections and establishes the procedures for monitoring and evaluation of the school concurrency process.

Data Sharing

To assist in coordinating planning efforts, the County and the Local Governments will initiate the compilation of data to the School Board no later than March 1st of each year.

The School District's annual plan amendments will assure the Local Governments that the capital improvements program continues to be financially feasible and that the level of service standards will continue to be achieved and maintained. To assist in the planning efforts, the School Board shall provide to the County and Local Governments the following by August 1st of each year:

- The Educational Facilities Plan (provided as Attachment "B");
- The Educational Plant Survey (provided as Attachment "C") shall be submitted to the County and the Local Governments at least once every five years.

C. School Site Selection and Infrastructure Planning

The School District, the County and the Local Governments will address the provision of supporting 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.

D. County Population Information

Currently, the School District and the County rely on the Office of Economic and Demographic Research (EDR) reported projections for the amount, type, and distribution of population growth and student enrollment. The Local Governments and the School District have established a coordination process through the ILA, and the parties agree to base future plans on consistent projections regarding the amount, type, and distribution of population growth and student enrollment. The geographic distribution of jurisdiction-wide growth forecasts is one of the major objectives of the process.

Clay County Population Projections

According to the U.S. Census, the total population for Clay County has increased by 50,051 people from 2000 to 2010. The EDR reports the total population from 2010 to 2015 has increased by 10,412 people. The number of households in Clay County has grown by over 22,000 since 2000, as shown in **Table 1**.

Table 1 – Clay County Population, 2000-2015

Year	Population	Households
2000	140,814	50,243
2010	190,865	68,792
2015	201,277	72,448

Source: Florida Demographic Estimating Conference, Dec. 2015 and Florida Population Studies, BEBR (EDR) Vol. 49, Bulletin 173, Dec. 2015

Approximately 90 percent of Clay County's population lives in unincorporated Clay County. This percentage is not projected to change appreciably over the course of the planning period. The population data and projections follow in **Table 2** for the Local Governments and the County. **Table 3** displays the changes in population over the planning period.

Table 2 – Clay County / Municipal Population 2010-2040

Jurisdiction	2010	2015	2020	2025	2030	2035	2040
Green Cove Springs	6,908	7,043	8,127	8,883	9,534	10,138	10,699
Keystone Heights	1,350	1,367	1,484	1,622	1,741	1,851	1,954
Orange Park	8,412	8,510	9,364	10,236	10,986	11,682	12,327
Penney Farms	749	746	805	880	945	1,005	1,059
Unincorporated County	173,446	183,611	203,620	222,579	238,894	254,024	268,061
County Totals	190,865	201,277	223,400	244,200	262,100	278,700	294,100

Source: BEBR, Florida Pop. Studies, Vol.50, Bulletin 177, April 2017, Clay County Planning and Building Divisions, 2017; Municipality projections are calculated based on 2016 proportion of County, EDO Research, Oct. 17, 2016.

Table 3 – Percent Change in Clay County / Municipal Population 2010-2040

Jurisdiction within County	Percent Change in Population and Projections					
	2010-2015	2015-2020	2020-2025	2025-2030	2030-2035	2035-2040
Green Cove Springs	0.0195	0.1539	0.0930	0.0733	0.0634	0.0553
Keystone Heights	.0126	0.0856	0.0930	0.0734	0.0632	0.0556
Orange Park	.0117	0.1004	0.0931	0.0733	0.0634	0.0552
Penney Farms	-.004	0.0794	0.0932	0.0739	0.0635	0.0537
Unincorporated County	.1605	0.1090	0.0931	0.0733	0.0633	0.0553
County Totals	.0546	0.1099	0.0931	0.0733	0.0633	0.0553

Source: Clay County Planning Division, 2017

School-Age Population Projections

According to the 2000 and 2010 U.S. Census figures and student counts performed by the Clay County School District, the school-age population has decreased in relation to the total population. As shown in **Table 4**, the school-age population in 2000 was 19.5%. Student population increased in 2010 but represented a smaller portion, 18.5% of the County population. In 2015, the number of students declined by almost 3% and the percent of total population falling to 17.1%. The number of students per household has declined over the long term from 0.546 in 2000 to 0.475 in 2015.

Table 4 – Public School Enrollment

Year	Number of K-12 Students	Percent of Total Population	Number Of Students Per Household
2000	27,415	19.5%	0.546
2010	35,349	18.5%	0.514
2015	34,387	17.1%	0.475

Source: Florida Department of Education COFTE, 2017

E. Existing Public School Facility Conditions

Current Enrollment

Between 2012 and 2016, enrollment in Clay County public schools declined from 34,712 to 34,599 students, or by .33 percent. **Table 5** below shows the trends in school enrollment over the last five years, by school type. The figures are taken from the Florida Department of Education's Capital Outlay Full-Time Equivalent (COFTE) student counts. The number of

students enrolled in Clay County public schools has declined in three of the last five years. This trend was also experienced in Putnam and Nassau counties whereas Duval County saw significant decline and St. Johns County experienced heavy growth.

Table 5 – School Enrollment by School type, 2012-2016

October Membership	Elementary (PreK-5)	Junior High (grades 6-8)	Senior High (grades 9-12)	Total (PreK-12)	Annual Growth
2012	15,500	8,374	10,838	34,712	-344
2013	15,402	8,355	10,623	34,379	-333
2014	15,464	8,193	10,865	34,521	142
2015	15,329	8,089	10,971	34,388	-133
2016	15,452	8,103	11,404	34,959	211

Source: COFTE, 2017

Current School Utilization

The Clay County School District currently operates 26 elementary schools, six junior high schools, six senior high schools, and one combination (7-12) school and one school for special education. **Tables 6-11** below identify each of these schools and their enrollment, capacity, and utilization rates. Using the lesser of FISH or Core capacity to measure capacity, the current total capacity for these schools is 42,031, with a current enrollment of 36,134. Comparing the enrollment to capacity provides an overall utilization rate of 86 percent.

Elementary Schools

Of the 26 elementary schools in the County, only one has utilization rates above 100 percent. However, the overall utilization for elementary schools is 93 percent. **Table 6** below shows the current elementary school enrollment, capacity, and utilization rates for each school.

Table 6 – Current Elementary School Utilization, SY 2016/17

School Code	School Name	Enrollment	Capacity	Utilization
AES	Argyle Elementary	737	789	93%
CEB	Charles E. Bennett Elementary	792	804	99%
CGE	Coppergate Elementary	490	747	66%
CHE	Clay Hill Elementary	442	474	93%
DIS	Doctor's Inlet Elementary	673	732	92%
FIE	Fleming Island Elementary	787	912	86%
GPE	Grove Park Elementary	473	512	92%
KHE	Keystone Heights Elementary	819	823	100%
LAE	Lake Asbury Elementary	819	970	84%
LES	Lakeside Elementary	813	876	93%
MRE	McRae Elementary	496	550	90%
MBE	Middleburg Elementary	568	650	87%
MCE	Montclair Elementary	544	631	86%
OPE	Orange Park Elementary	484	504	96%
OVE	Oakleaf Village Elementary	913	1,043	88%
PES	R. M. Patterson Elementary	937	1,018	92%
POE	Plantation Oaks Elementary	1,297	1,362	95%
ROE	Rideout Elementary	489	643	76%
RVE	Ridgeview Elementary	521	565	92%
SBJ	S. Bryan Jennings Elementary	479	712	67%
SLE	Shadowlawn Elementary	693	863	80%
SPC	Swimming Pen Creek Elementary	393	530	74%
TBE	Thunderbolt Elementary	969	1,128	86%
TES	Tynes Elementary	934	1,004	93%
WEC	W. E. Cherry Elementary	663	845	78%
WES	Wilkinson Elementary	750	810	93%
	Total	17,975	19,256	93%

Source: Clay County School District Educational Facilities Plan, 2016/17-2021/22

Junior High Schools

There are six junior high schools in the County, none of which has a utilization rate above 100 percent. As of the 20-day enrollment count conducted by the School District, in 2016-17, the junior high schools, as a school type, have an overall utilization of 81 percent. **Table 7** below displays the current junior high school enrollment, capacity, and utilization rates for each school.

Table 7 – Current Junior High School Utilization, SY 2016/17

School Code	School Name	Enrollment	Capacity	Utilization
GCJH	Green Cove Springs Junior High	803	922	87%
LAJH	Lake Asbury Junior High	1,163	1,302	89%
LJH	Lakeside Junior High	827	1,206	69%
OLJ	Oakleaf Junior High (6-8)	1,499	1,568	96%
OPJH	Orange Park Junior High	690	1,062	65%
WJH	Wilkinson Junior High	713	781	91%
	Total	5,695	6,841	81%

Source: Clay County School District Educational Facilities Plan, 2016/17-2021/22

Senior High Schools

Of the six high schools in the County, one has a utilization rate above 100 percent. Although one high school, Middleburg High currently has a utilization rate of 107 percent, the overall utilization rate for senior high schools, as a school type, is 81 percent. **Table 8** below displays the current high school utilization rates for each school.

Table 8 – Current Senior High School Utilization, SY 2016/17

School Code	School Name	Enrollment	Capacity	Utilization
CHS	Clay High	1,429	1,833	78%
FIHS	Fleming Island High	2,239	2,375	94%
MHS	Middleburg High	1,748	1,637	107%
OLH	Oakleaf High	2,400	2,459	98%
OPH	Orange Park High	1,575	2,343	67%
RHS	Ridgeview High	1,624	2,254	72%
	Total	11,015	12,901	81%

Source: Clay County School District Educational Facilities Plan, 2016/17-2021/22

Combination / Other Schools

The County has one combination school that includes grades 7 through 12 and one special education school. While these schools differ in their student makeup and utilization rates, together, they have an overall utilization of 71 percent. **Table 9** below shows the current combination school's and special education school's utilization rates.

Table 9 – Current Combination/Other School Utilization, SY 2016/17

School Code	School Name	Enrollment	Capacity	Utilization
BLC	Bannerman Learning Center	164	332	49%
KHHS	Keystone Heights High (7-12)	1,232	1,399	88%
	Total	1,396	1,731	71%

Source: Clay County School District Educational Facilities Plan, 2016/17-2021/22

Overall, the School District maintains a utilization rate of 84 percent (see **Table 20**). The overall student enrollment total, as of the 20-day count conducted by the School District is 1,022 students greater than the Capital Outlay FTE forecast for 2016 provided by the Department of Education. **Table 10** displays these figures.

Table 10 – Current Total School Utilization, SY 2016/17

	Enrollment	Capacity	Utilization
Student Total	36,081	43,646	83%
DOE Capital Outlay FTE Forecast	35,059	43,646	80%

Source: DOE Capital Outlay Forecast 2016/17, fldoe.org

School Capacity Measures

School capacity is measured in two ways: FISH capacity and core capacity. FISH capacity is based on the Florida Inventory of School Houses (FISH) Manual. The utilization rate is determined by dividing the student enrollment into the school's capacity. Core capacity is based on the student capacity of the cafeteria. The cafeteria capacity is the number of students that may be housed in a school based on the size of the dining facility (cafeteria).

The Clay County School District has defined its capacity by using the lesser of the total FISH capacity or the core cafeteria capacity.

F. Projected Public School Facility Conditions

Capital Outlay Full Time Equivalent (COFTE) Projections

In June or July of each year, the Florida Department of Education (DOE) publishes grade by grade Capital Outlay Full Time Equivalent (COFTE) enrollment projections for every school district for the next five to ten years. The State uses a standard 'cohort survival' method using five year enrollment trends. **Table 12** identifies the Pre-K through Grade 12 DOE projected student growth through the school year 2020\21. This methodology is used nation-wide and is considered fairly reliable.

Although the State provides a relatively accurate projection, solely relying upon the COFTE projections for enrollment forecasting may be insufficient without local adjustment. Some significant reasons for adjustment are as follows:

The DOE projections are based on an average of two 'head counts' – one in October and one in February. Therefore, the COFTE tends to under-project the number of high school students that show up in the fall by including winter drop-outs from the spring count. For facilities planning purposes the school district wants to insure that adequate classrooms are available for the peak fall semester and therefore prefers to use the October head count as the basis for planning.

The DOE forecast is not available until July of the upcoming year. However, using an October count, the School District is able to prepare a new forecast by January.

The DOE forecast does not count all of the students in the School District's buildings, and includes others that are not in District-owned buildings. For example, the DOE forecast excludes students in special or alternative schools or homebound settings. The School District's enrollment for facilities planning purposes includes only students in regular schools. By contrast, the State's forecast includes only pre-kindergarten (Pre-K) students that are in special education (ESE), while the school district provides Pre-K programs for many non-ESE students.

Five Year Forecast

The five year forecast is the basis for the School District's Educational Plant Survey and Educational Facilities Plan (EFP). The School District develops the data and analysis for the EFP in the spring for final approval in September each year. Enrollment projections are prepared using the same standard cohort model as the State, using the State's birth projections. The School District prepares the projections for each school and each grade, modifying information where boundary changes have affected trends or where staff has unique information of housing trends.

According to state law, the School District is required to accurately project future student enrollment and school capacity. **Table 12** summarizes data provided by the Florida Department of Education (DOE) and displays the population projections and projected student growth through the school year 2020-21. According to the projections by the DOE, student population is expected to increase from 2016-17 through 2020-21.

Table 11 – District Enrollment Projection Comparisons

School Year	DOE COFTE	Change from Previous Year
2016/17	35,088	489
2017/18	35,327	239
2018/19	35,428	101
2019/20	35,432	4
2020/21	35,626	194

Source: Clay County School District Educational Facilities Plan, 2016/17-2021/22

Projected Enrollment

The School District's EFP contains the COFTE projections provided by the DOE. **Table 12** below disaggregates the District's annual enrollment projections by grade level, pre-K through grade 12, with a summary of the COFTE growth projections provided in **Table 13**.

According to the School District's 2016/17 EFP, during the next five year period, the District plans to construct one new school. By the 2036-37 school year, a total of 6 schools are planned for construction. The proposed new schools for the five year period are shown in Figure 2.

Table 12 – Preliminary 2016-17 Capital Outlay FTE Forecast (COFTE)

Grade	Actual 2015-2016	2016-17	2017-18	2018-19	2019-20	2020-21
PK	333	328	328	337	350	361
K	2,394	2,395	2,345	2,328	2,347	2,447
1	2,458	2,425	2,427	2,379	2,360	2,376
2	2,478	2,465	2,433	2,436	2,388	2,367
3	2,598	2,522	2,510	2,477	2,478	2,428
4	2,625	2,597	2,523	2,512	2,477	2,476
5	2,566	2,666	2,647	2,573	2,560	2,523
6	2,636	2,661	2,772	2,754	2,676	2,661
7	2,770	2,755	2,786	2,900	2,879	2,798
8	2,697	2,898	2,894	2,926	3,040	3,020
9	2,965	2,799	3,007	3,003	3,033	3,145
10	2,893	3,014	2,850	3,058	3,049	3,075
11	2,804	2,943	3,046	2,897	3,080	3,075
12	2,383	2,620	2,758	2,849	2,714	2,875
Total	34,599	35,088	35,327	35,428	35,432	35,626

Source: Clay County School District Educational Facilities Plan, 2016/17-2021/22

Table 13 – 2016 COFTE Projected Growth Summary*

Grade	2016-17	2017-18	2018-19	2019-20	2020-21
PK-5	-	-	-	-	-
6-8	122	138	128	16	-
9-12	332	285	145	71	293
Total	454	423	273	87	293

*Growth is the difference between the current year and the highest of the three previous years. Negative differences are shown as "-".

Source: Clay County School District Educational Facilities Plan, 2016/17-2021/22

The projected enrollment for Clay County public schools, **Tables 14-18** below, provides the elementary, middle, and high school enrollments for the next five years. These projections will be updated annually as new data is provided through the coordination of shared local data and COFTE projections.

Table 14 – Actual and Projected Elementary School Enrollment by School Attendance Zones

School Code	Attendance Zone	2016-17 (actual)	2017-18	2018-19	2019-20	2020-21
AES	Argyle Elementary	737	734	726	720	720
CEB	Charles E. Bennett Elementary	792	789	787	788	796
CGE	Coppergate Elementary	490	488	483	478	478
CHE	Clay Hill Elementary	442	440	435	432	432
DIS	Doctor's Inlet Elementary	673	670	663	657	657
FIE	Fleming Island Elementary	787	784	775	768	769
GPE	Grove Park Elementary	473	471	466	462	462
KHE	Keystone Heights Elementary	819	816	807	800	800
LAE	Lake Asbury Elementary	819	831	845	852	860
LES	Lakeside Elementary	813	810	801	794	794
MRE	McRae Elementary	496	494	489	484	484
MBE	Middleburg Elementary	568	566	560	555	555
MCE	Montclair Elementary	544	542	536	531	531
OPE	Orange Park Elementary	484	482	477	473	473
OVE	Oakleaf Village Elementary	913	930	941	941	941
PES	R.M. Paterson Elementary	937	980	985	976	976
POE	Plantation Oaks Elementary	1,297	1355	726	720	720
ROE	Ride Out Elementary	489	502	512	522	537
RVE	Ridgeview Elementary	521	519	513	509	509
SBJ	S. Bryan Jennings Elementary	479	477	472	468	468
SLE	Shadowlawn Elementary	693	695	692	691	695
SPC	Swimming Pen Creek Elementary	393	397	396	393	393
TBE	Thunderbolt Elementary	969	970	960	951	951
TES	Tynes Elementary	934	972	970	969	976
WEC	W.E. Cherry Elementary	663	660	653	647	647
WES	Wilkinson Elementary	750	747	739	732	732
Y	Elementary "Y"			685	706	733
Elementary Total		17,975	18,118	18,094	18,018	18,088

Source: Clay County School District Educational Facilities Plan, 2016/17-2021/22

Table 15 – Actual and Projected Junior High School Enrollment by School Attendance Zones

School Code	Attendance Zone	2016-17 (actual)	2017-18	2018-19	2019-20	2020-21
GCJH	Green Cove Springs Junior	803	825	855	873	862
LAJH	Lake Asbury Junior High	1,163	1,175	1,215	1,242	1,227
LJH	Lakeside Junior High	827	833	855	869	854
OLJ	Oakleaf Junior High (6-8)	1,499	1,527	1,572	1,596	1,584
OPJH	Orange Park Junior High	690	693	711	723	710
WJH	Wilkinson Junior High	713	728	749	763	752
Junior High Total		5,695	5,781	5,957	6,066	5,990

Source: Clay County School District Educational Facilities Plan, 2016/17-2021/22

Table 16 – Actual and Projected High School Enrollment by School Attendance Zones

School Code	Attendance Zone	2016-17 (actual)	2017-18	2018-19	2019-20	2020-21
CHS	Clay High	1,429	1,499	1,517	1,561	1,640
FIHS	Fleming Island High	2,239	2,303	2,332	2,348	2,406
MHS	Middleburg High	1,748	1,800	1,822	1,838	1,894
OPH	Orange Park High	1,575	1,614	1,635	1,644	1,685
RHS	Ridgeview High	1,624	1,665	1,685	1,696	1,737
OHS	Oakleaf High	2,400	2,521	2,552	2,608	2,707
High School Total		11,015	11,402	11,544	11,695	12,068

Source: Clay County School District Educational Facilities Plan, 2016/17-2021/22

Table 17 – Projected Combination/Other School Enrollment by School Attendance Zones

School Code	Attendance Zone	2016-17 (actual)	2017-18	2018-19	2019-20	2020-21
BLC	Bannerman Learning Center	164	168	170	171	175
KHHS	Keystone Heights High (7-12)	1,232	1,255	1,276	1,287	1,302
Combination/Other Total		1,396	1,423	1,446	1,459	1,302

Source: Clay County School District Educational Facilities Plan, 2016/17-2021/22

Table 18 – Comparison of Projected Total Enrollments

School Code	Attendance Zone	2016-17 (actual)	2017-18	2018-19	2019-20	2020-21
	Student Total	36,081	36,724	37,041	37,238	37,624
	DOE Capital Outlay FTE Forecast	35,089	35,327	35,428	35,432	35,625

Source: Clay County School District Educational Facilities Plan, 2016/17-2021/22

Figure 1 – Existing Schools in Clay County

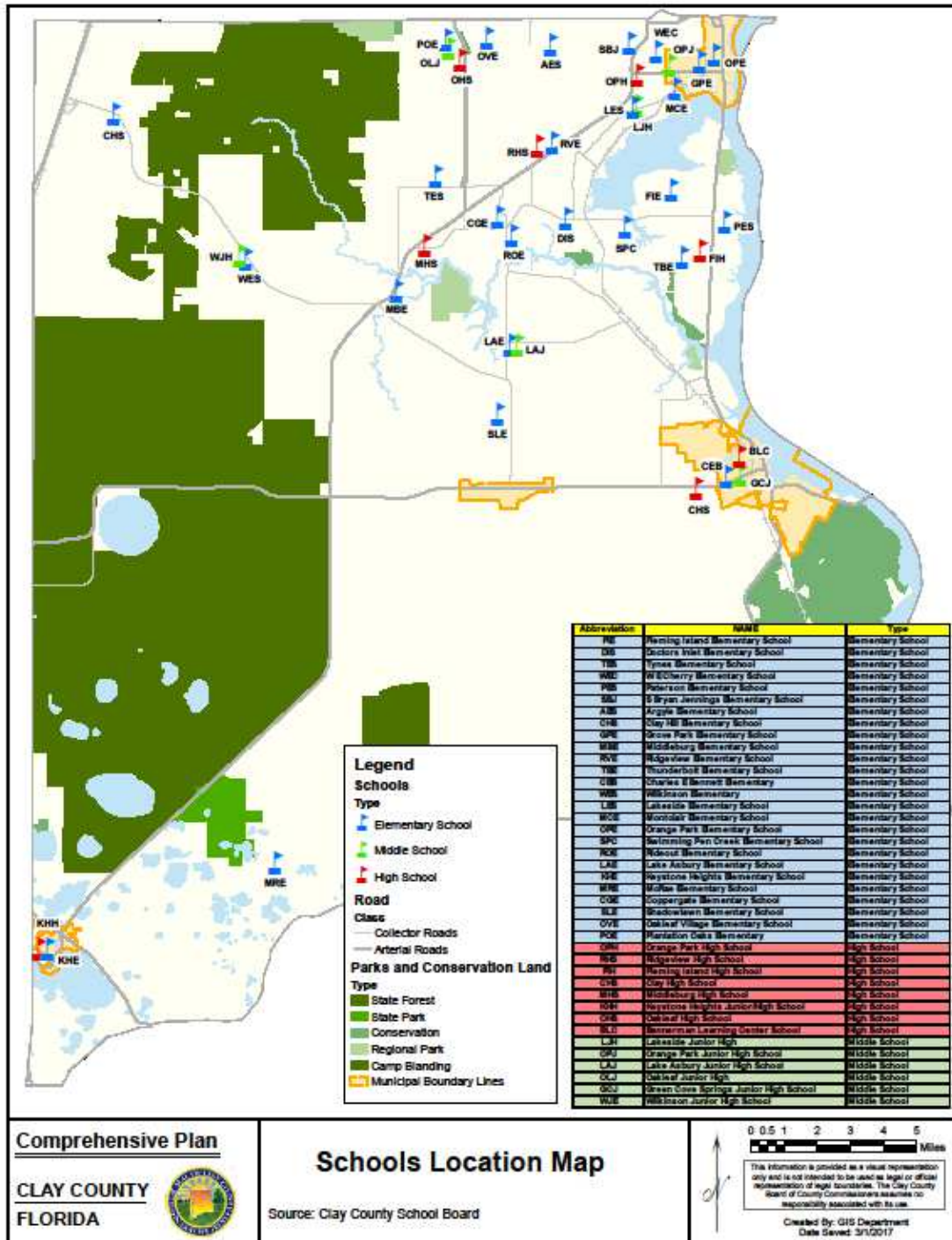
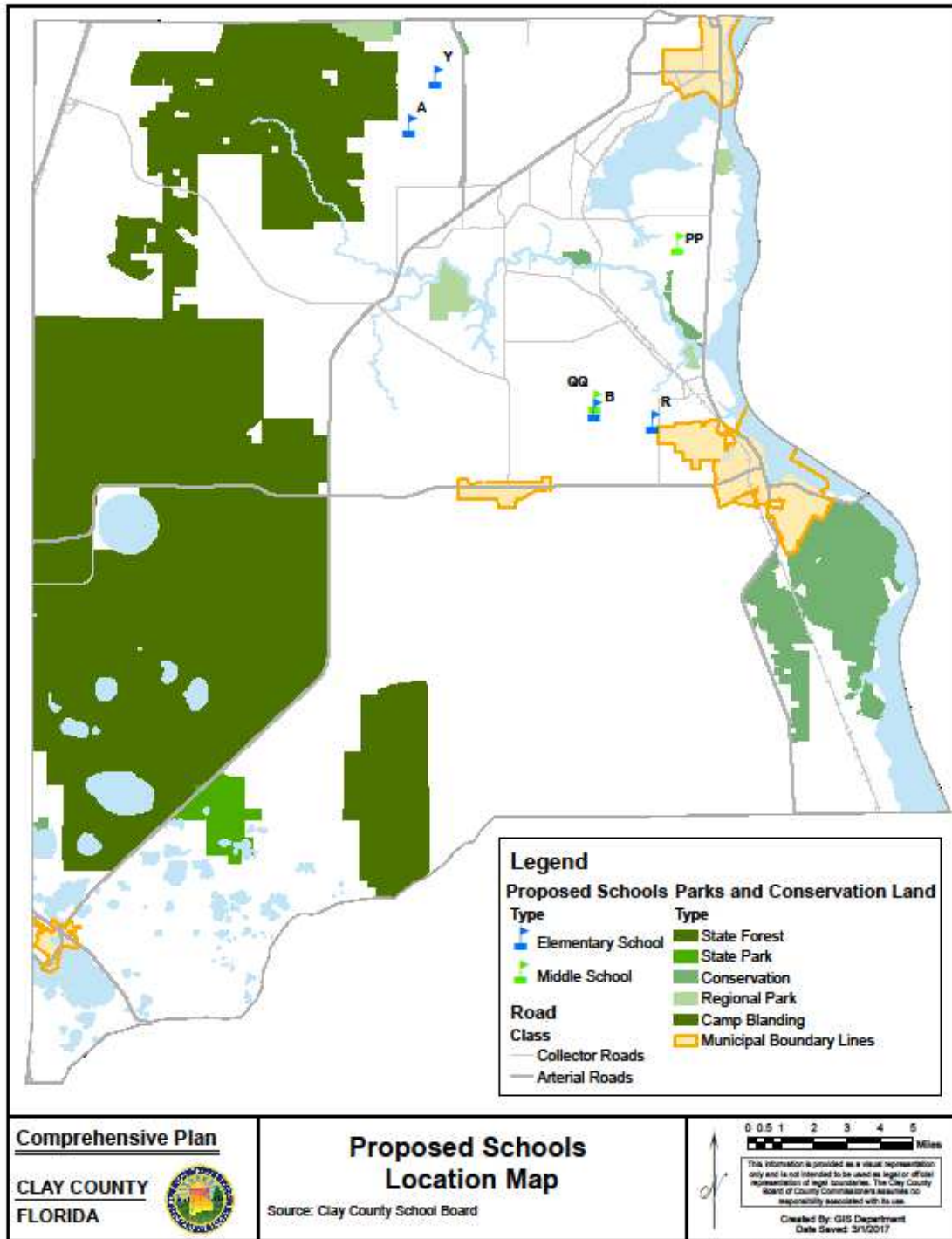


Figure 2 – New Schools Planned for Clay County



Public School Facility Summary

The data in **Tables 19 and 20** (based on 2016 DOE COFTE numbers) is measured at the student station level, which is the unit of measure used to calculate school capacity. In the Clay County School District, the facility capacity uses student stations required per student for an instructional program based on the particular course content. Analysis of the student stations is necessary to achieve the desired level of service for elementary, junior high, and high schools detailed below. The computation of individual school utilization is achieved through the ratio of the number of student stations to the number of students enrolled in each school.

Tables 19 and 20 display the current and projected utilization calculations per school type through school year 2025/26. Schools with utilization rates greater than 100 percent are highlighted in yellow, and the red indicates utilization rates above the adopted utilization rate level of service of 110 percent. The school capacities marked in red indicate programmed new schools. Approximately 1,541 additional students are projected to enter Clay County schools by 2020/21. To meet the expected growth and achieve the adopted level of service of 110 percent for all school types, over the next five years the County plans to construct one additional school at the elementary level. The general locations of future school sites are based on the school siting policies outlined in the ILA and Comprehensive Plans of the Local Governments.

Elementary Schools

The Clay County School District currently operates 26 elementary schools. The newest elementary school is set to open in the 2018/19 school year, with 862 student stations. With the addition of the new elementary school, the number of permanent elementary student stations by 2020 will be 20,986. The enrollment projection for the five-year planning period identifies a total of 18,088 elementary students by 2020. The estimated district-wide utilization at the elementary school level will be approximately 86 percent at the end of the five-year planning period. No schools will exceed their capacity by school year 2020\21.

Junior High Schools

The School District currently operates six junior high schools, none of which exceeded their capacity as of the 2016 20-day count conducted by the School District. The total number of district-wide junior high school student stations is 7,024. Based on growth projections, the estimated district-wide utilization at the junior high school level will be approximately 85 percent for the 2020/21 school year. One junior high school will exceed the 100% standard by the 2018/19 school year but does remain below the 110% threshold.

High Schools and Combination Schools

Currently, there are six high schools, one combination school, and one learning center in Clay County. The high schools currently have an overall utilization rate of 89 percent and contain 12,207 students. One high school is currently at 107% utilization and predicted to be at 116% by the 2020/21 school year. However, the projected 10-year capital outlay full-time equivalent student enrollment is less than 2,000 students and the capacity rate for all schools within the school district in the tenth year will not exceed the 100-percent limitation.

Table 19 – Level of Service by School Type SY 2016/17 Through 2020/21

School Code	SCHOOL NAME	Total FISH Capacity	Core (Cafeteria + multipurpose area)	SY 16/17		SY 17/18		SY 18/19		SY 19/20		SY 20/21	
				Actual Enrollment 8/23/16	Utilization	COFTE Enroll.	Utilization	COFTE Enroll.	Utilization	COFTE Enroll.	Utilization	COFTE Enroll.	Utilization
Elementary School 2016-2021													
AES	Argyle Elementary	789	1352	737	93%	734	93%	726	92%	720	91%	720	91%
CEB	Charles E. Bennett Elementary	870	804	792	99%	789	98%	795	99%	803	100%	818	102%
CGE	Coppergate Elementary	747	1320	490	66%	488	65%	483	65%	478	64%	478	64%
CHE	Clay Hill Elementary	474	770	442	93%	440	93%	435	92%	432	91%	432	91%
DIS	Doctor's Inlet Elementary	732	735	673	92%	670	92%	663	91%	657	90%	657	90%
FIE	Fleming Island Elementary	912	1485	787	86%	784	86%	775	85%	768	84%	769	84%
GPE	Grove Park Elementary	512	925	473	92%	471	92%	466	91%	462	90%	462	90%
KHE	Keystone Heights Elementary	896	823	819	100%	816	99%	807	98%	800	97%	800	97%
LAE	Lake Asbury Elementary	970	1084	819	84%	837	86%	854	88%	861	89%	876	90%
LES	Lakeside Elementary	876	888	813	93%	810	92%	801	91%	794	91%	794	91%
MRE	McRae Elementary	550	1485	496	90%	494	90%	489	89%	484	88%	484	88%
MBE	Middleburg Elementary	650	1279	568	87%	566	87%	560	86%	555	85%	555	85%
MCE	Montclair Elementary	631	781	544	86%	542	86%	536	85%	531	84%	531	84%
OPE	Orange Park Elementary	504	565	484	96%	482	96%	477	95%	473	94%	473	94%
OVE	Oakleaf Village Elementary	1043	1362	913	88%	924	89%	929	89%	936	90%	951	91%
PES	R.M. Paterson Elementary	1018	1336	937	92%	972	95%	992	97%	983	97%	983	97%
POE	Plantation Oaks Elementary	1433	1362	1297	95%	1373	101%	1405	103%	1419	104%	1447	106%
ROE	RideOut Elementary	643	1320	489	76%	509	79%	519	81%	529	82%	544	85%
RVE	Ridgeview Elementary	565	776	521	92%	519	92%	513	91%	509	90%	509	90%
SBJ	S. Bryan Jennings Elementary	712	1086	479	67%	477	67%	472	66%	468	66%	468	66%
SLE	Shadowlawn Elementary	863	1362	693	80%	692	80%	687	80%	683	79%	685	79%
SPC	Swimming Pen Creek Elementary	530	1352	393	74%	391	74%	387	73%	384	72%	384	72%
TBE	Thunderbolt Elementary	1128	1353	969	86%	970	86%	963	85%	954	85%	954	85%
TES	Tynes Elementary	1004	1366	934	93%	971	97%	961	96%	952	95%	952	95%
WEC	W.E. Cherry Elementary	845	855	663	78%	660	78%	653	77%	647	77%	647	77%
WES	Wilkinson Elementary	810	1372	750	93%	747	92%	739	91%	732	90%	732	90%
R	Elementary "R"	0	0										
Y	Elementary "Y"	0	0										
	Total:	20707	29198	17975	87%	18125	88%	18087	87%	18014	87%	18104	87%

Table 19 – Level of Service by School Type SY 2016/17 Through 2020/21 continued

Junior High School 2016-21													
GCJ	Green Cove Springs Junior High	922	1750	803	87%	824	89%	859	93%	877	95%	866	94%
LAJ	Lake Asbury Junior High	1449	1747	1163	80%	1177	81%	1219	84%	1247	86%	1235	85%
LJH	Lakeside Junior High	1206	1263	827	69%	831	69%	852	71%	866	72%	851	71%
OLJ	Oakleaf Junior High (6-8)	1751	1568	1499	96%	1530	98%	1571	100%	1597	102%	1590	101%
OPJ	Orange Park Junior High	1062	1262	690	65%	693	65%	711	67%	723	68%	710	67%
WJH	Wilkinson Junior High	781	1108	713	91%	728	93%	747	96%	759	97%	746	96%
PP	Junior High "PP"												
Total:		7171	8698	5695	79%	5783	81%	5959	83%	6069	85%	5998	84%
High School 2016-21													
CHS	Clay High	1958	2179	1429	73%	1501	77%	1519	78%	1576	80%	1665	85%
FIH	Fleming Island High	2375	2485	2239	94%	2303	97%	2332	98%	2348	99%	2406	101%
MHS	Middleburg High	2407	1637	1748	107%	1800	110%	1822	111%	1834	112%	1881	115%
OPH	Orange Park High	2343	2818	1575	67%	1614	69%	1635	70%	1644	70%	1685	72%
RHS	Ridgeview High	2254	2299	1624	72%	1669	74%	1689	75%	1700	75%	1742	77%
OLH	Oakleaf High	2459	2845	2400	98%	2528	103%	2560	104%	2609	106%	2720	111%
Total:		13796	14263	11015	80%	11415	83%	11557	84%	11711	85%	12099	88%
Combination / Other 2016-21													
BLC	Bannerman Learning Center	568	332	164	49%	168	50%	170	51%	171	52%	175	53%
KHHS	Keystone Heights High (7-12)	1399	2247	1232	88%	1255	90%	1276	91%	1287	92%	1302	93%
Total:		1967	2579	1396	71%	1423	72%	1446	74%	1459	74%	1477	75%
Grand Total:		43641	54738	36081	83%	36746	84%	37049	85%	37253	85%	37679	86%
GRAPH KEY													
		LOS Exceeds 100%											
		LOS Exceeds 110%											
		Indicates New Capacity											

Table 20 – Level of Service by School Type SY 2021/22 Through 2025/26

School Code	SCHOOL NAME	Total FISH Capacity	Core (Cafeteria + Multipurpose area)	SY 21/22		SY 22/23		SY 23/24		SY 24/25		SY 25/26	
				COFTE Enroll.	Utilization	COFTE Enroll.	Utilization	COFTE enroll.	Utilization	COFTE Enroll.	Utilization	COFTE Enroll.	Utilization
Elementary School 2021-2026													
AES	Argyle Elementary	789	1352	726	92%	737	93%	749	95%	757	96%	769	97%
CEB	Charles E. Bennett Elementary	870	804	826	103%	837	104%	851	106%	861	107%	874	109%
CGE	Coppergate Elementary	747	1320	483	65%	490	66%	498	67%	503	67%	511	68%
CHE	Clay Hill Elementary	474	770	436	92%	442	93%	449	95%	454	96%	461	97%
DIS	Doctor's Inlet Elementary	732	735	663	91%	673	92%	684	93%	691	94%	702	96%
FIE	Fleming Island Elementary	912	1485	776	85%	786	86%	800	88%	808	89%	821	90%
GPE	Grove Park Elementary	512	925	466	91%	473	92%	481	94%	486	95%	494	96%
KHE	Keystone Heights Elementary	896	823	807	98%	818	99%	832	101%	841	102%	855	104%
LAE	Lake Asbury Elementary	970	1084	884	91%	897	92%	912	94%	922	95%	936	97%
LES	Lakeside Elementary	876	888	801	91%	812	93%	826	94%	835	95%	848	97%
MRE	McRae Elementary	550	1485	489	89%	496	90%	504	92%	509	93%	518	94%
MBE	Middleburg Elementary	650	1290	560	86%	568	87%	577	89%	583	90%	593	91%
MCE	Montclair Elementary	631	781	536	85%	544	86%	553	88%	559	89%	568	90%
OPE	Orange Park Elementary	504	565	477	95%	484	96%	492	98%	497	99%	505	100%
OVE	Oakleaf Village Elementary	1043	1362	960	92%	973	93%	990	95%	1000	96%	1016	97%
PES	R.M. Paterson Elementary	1018	1336	992	97%	1006	99%	1023	100%	1034	102%	1050	103%
POE	Plantation Oaks Elementary	1433	1362	1460	107%	1480	109%	1505	111%	1522	112%	1546	113%
ROE	RideOut Elementary	643	1320	549	85%	557	87%	566	88%	572	89%	581	90%
RVE	Ridgeview Elementary	565	776	513	91%	521	92%	529	94%	535	95%	544	96%
SBJ	S. Bryan Jennings Elementary	712	1086	472	66%	479	67%	487	68%	492	69%	500	70%
SLE	Shadowlawn Elementary	863	1362	691	80%	701	81%	712	83%	720	83%	732	85%
SPC	Swimming Pen Creek Elementary	530	1352	387	73%	393	74%	399	75%	404	76%	410	77%
TBE	Thunderbolt Elementary	1128	1353	963	85%	976	87%	993	88%	1004	89%	1020	90%
TES	Tynes Elementary	1004	1366	961	96%	975	97%	991	99%	1002	100%	1018	101%
WEC	W.E. Cherry Elementary	845	855	653	77%	663	78%	674	80%	681	81%	692	82%
WES	Wilkinson Elementary	810	1372	739	91%	750	93%	762	94%	770	95%	783	97%
R	Elementary "R"	0											
Y	Elementary "Y"	0											
	Total:	20707	29209	18272	88%	18527	89%	18837	91%	19044	92%	19346	93%

Table 20 – Level of Service by School Type SY 2021/22 Through 2025/26 continued

Junior High School 2021-2026													
GCJH	Green Cove Springs Junior High	922	1750	854	93%	848	92%	844	92%	830	90%	814	88%
LAJH	Lake Asbury Junior High	1449	1747	1218	84%	1210	83%	1204	83%	1184	82%	1161	80%
LJH	Lakeside Junior High	1206	1263	840	70%	834	69%	829	69%	816	68%	800	66%
OLJH	Oakleaf Junior High (6-8)	1751	1568	1578	101%	1576	101%	1578	101%	1565	100%	1551	99%
OPJH	Orange Park Junior High	1062	1262	701	66%	696	66%	692	65%	681	64%	668	63%
WJH	Wilkinson Junior High	781	1108	736	94%	731	94%	727	93%	715	92%	701	90%
PP	Junior High "PP"		0										
Total:		7171	8698	5927	83%	5894	82%	5874	82%	5789	81%	5695	79%
High School 2021-2026													
CHS	Clay High	1958	2179	1686	86%	1692	86%	1691	86%	1651	84%	1620	83%
FIHS	Fleming Island High	2375	2485	2435	103%	2445	103%	2442	103%	2385	100%	2340	99%
MHS	Middleburg High	2407	1637	1905	116%	1912	117%	1910	117%	1865	114%	1830	112%
OPH	Orange Park High	2343	2818	1706	73%	1712	73%	1711	73%	1671	71%	1639	70%
RHS	Ridgeview High	2254	2299	1763	78%	1770	79%	1768	78%	1727	77%	1694	75%
OLHS	Oakleaf High School	2459	2845	2754	112%	2764	112%	2761	112%	2697	110%	2646	108%
Total:		13796	14263	12248	89%	12295	89%	12283	89%	11996	87%	11770	85%
Combination / Other 2021-2026													
BLC	Bannerman Learning Center	568	332	175	53%	176	53%	177	53%	176	53%	169	51%
KHHS	Keystone Heights High (7-12)	1399	2130	1302	93%	1308	94%	1309	94%	1306	93%	1254	90%
Total:		1967	2462	1477	75%	1484	75%	1485	76%	1482	75%	1423	72%
Student Total:		43641	54632	37924	87%	38200	88%	38479	88%	38311	88%	38234	88%
GRAPH KEY													
		LOS Exceeds 100%											
		LOS Exceeds 110%											
		Indicates New Capacity											

10 and 20 Year Forecast

The School District currently relies on COFTE projection trends. The School District plans to work to incorporate the County's population projection methodology in future population projections, and for zoning and land use capacity analyses. The first five years of the School District's enrollment forecast are based on COFTE projections balanced with the cohort survivor model modified to reflect housing and program trends. This method is reliable for three to five years of enrollment projections.

Planned Improvements

The EFP provides for short-term and long-term capacity improvements, both over the Five-Year planning period and for a 10-20 year time horizon. These capacity projects are presented in greater detail in **Table 27**. Attachment B provides the School District's detailed capital plan for additional capacity.

G. Student Generation Rates

Determining the number of students generated from new residential development is necessary to accurately assess a new residential development's impact on public schools. This student generation rate allows the School District to calculate the number of new students that can be expected from a residential development, based on the number and type of residential units proposed. With the projected number of students defined, the impact of the residential development on available school capacity can be determined.

The School District's Educational Facilities Plan (EFP) 2016-17, provided as Attachment B, describes the data and equations used to formulate the Student Generation Rates (SGRs) for Clay County. Each residential housing type, whether single family, multi-family, or mobile home, generates a different number of students per unit, based on the current distribution of students within existing housing types in Clay County.

The formulas and figures presented below in **Tables 21– 25** outline the methodology used to determine SGRs within Clay County. **Table 26** provides the final SGRs for new residential development, disaggregated by residential housing type and school level.

Table 21 – Student Distribution by Grade Level

Student Distribution by Grade Level		
Grade Level	# Students	Distribution
PK-6	18,676	52.65%
7-8	5,543	15.63%
9-12	11,256	31.73%
Total	35,475	100.01%

Table 22 – Estimated Students per Total Dwelling Units

Estimated Students per Total Dwelling Units				
Occupied Dwelling Units	=	68,016	=	89.06%
Total Dwelling Units ²		76,369		
PK-12 Students	=	35,475	=	0.5216
Total Dwelling Units		68,016		

Table 23 – Occupied Dwelling Unit Distribution by Type

Occupied Dwelling Unit Distribution by Type		
Type	# Units	Distribution
Single Family	50,742	74.61%
Mobile Home	8,993	13.22%
Multi-Family	8,279	12.17%
Total	68,014	100.00%

Table 24 – Total Dwelling Units

Total Dwelling Units ²	
Single Family	56,975
Mobile Home	10,098
Multi-Family	9,296
Total	76,369

Table 25 – Students per Dwelling Unit by Dwelling Type

Students per Dwelling Unit by Dwelling Type				
Grade Level	SF	MH	MF	Total
PK-6	0.2099	0.0379	0.0437	0.2915
7-8	0.0663	0.0120	0.0138	0.0921
9-12	0.1225	0.0221	0.0255	0.1701
Total	0.3987	0.0720	0.0830	0.5537

¹ Total Dwelling Units are defined as Occupied, Vacant and Seasonal Housing Units (U.S. Census 2010)

H. Level of Service

The Level of Service (LOS) standards, which are adopted in the Interlocal Agreement (ILA) as well as in the Public School Facilities Element and Capital Improvements Element, are used to establish maximum permissible school utilization rates relative to capacity. The school concurrency program's LOS standards balance the School District's ability to finance a capital program with its ability to achieve and maintain the adopted LOS for public schools. The establishment of a LOS ensures that new or expanded school facilities are built in time to accommodate students generated from new residential developments.

The Florida Legislature recognizes that an essential requirement for a concurrency management system is the LOS at which a public facility is expected to operate. Local governments that apply concurrency to public education facilities must include principles, guidelines, standards, strategies and the adopted LOS in their comprehensive plan and interlocal agreements. The ability to achieve and maintain the LOS must be based on a financially feasible Five-Year Capital Plan, adopted annually by the School Board. The LOS standards for schools will be adopted into the Capital Improvement Element of the Local Governments' comprehensive plans and must apply district-wide for all schools of the same type.

Clay County has established a level of service (LOS) standard of 110 percent for each school type in each SCSA has been established to ensure that a financially feasible capital plan will address the capacity of schools, sufficient to support student growth.

Long-Term Concurrency Management System

According to s.163.3180(9), F.S., (prior to the 2011 amendment that made school concurrency optional) when a school district demonstrates a school facility backlog for existing development which cannot be adequately addressed in a 10-year plan, the State land planning agency may allow it to develop a plan and long-term schedule of capital improvements covering of up to 15 years for good and sufficient cause, based on a general comparison between that local government and all other similarly situated local jurisdictions, using the following factors:

1. The extent of the backlog.
2. The cost of eliminating the backlog.
3. The local government's tax and other revenue-raising efforts.

The local government may issue approvals to commence construction notwithstanding s. 163.3180 F.S., consistent with and in areas that are subject to a long-term concurrency management system. If the local government adopts a long-term concurrency management system, it must evaluate the system periodically. At a minimum, the local government must assess its progress toward improving LOS within the long-term concurrency management district or area in the evaluation and appraisal report and determine any changes that are necessary to accelerate progress in meeting acceptable LOS.

As detailed in the residential development and school utilization analyses above, residential development and the increase in students associated with this development, is not occurring at a uniform rate throughout the County. Several areas in the county are experiencing higher rates of residential development activity than others. Areas with significant increases in residential development are likely to experience subsequent increases in the student population. Because of these circumstances, the utilization of existing schools in these areas will exceed the desired

LOS standard until new capacity can be constructed.

In 2008, the Clay County School District established a long term concurrency management system to address existing deficiencies at schools. The Long-Term Concurrency Management System (LTCMS) was to be utilized to address those schools for which backlogs existed, and which needed additional time to meet the adopted LOS of 110 percent. The LTCMS provided interim LOS standards for specific SCSAs for a 10-year period. The LOS for these schools will last for a 10-year period to add capacity and adjust the LOS through a financially feasible plan. Since SCSAs are based on school attendance boundaries, each recommended tiered LOS within the LTCMS includes only one school. All schools will meet the adopted LOS of 110 percent by school year 2017/18.

I. School Concurrency Service Areas

School Concurrency Service Areas (SCSA) are geographic areas in which the LOS standard is measured when an application for residential development is reviewed for school concurrency purposes. A fundamental requirement of school concurrency is the establishment of these areas. This includes the option to establish a district-wide or single service area for each school type, or less than district-wide, which are smaller geographic service areas. These SCSAs are used to determine whether adequate capacity is available to accommodate new students generated from residential development.

District-wide or Less than District-wide SCSA

At the time of Clay County program establishment, the legislature allowed school concurrency to be applied district-wide initially, but required that it be applied on a less than district-wide basis within five years of adoption. This was to ensure that development was coordinated with schools having available capacity. When applying school concurrency less than district-wide, the school district was required to maximize utilization of their schools and to apply “adjacency” when reviewing residential development. Maximizing utilization required the school district to evaluate school enrollment and attempt to balance the enrollment by shifting children from schools that are over capacity to schools that are under capacity to the greatest extent possible.

Clay County SCSAs

The School District and the County determined to apply school concurrency on a less than district-wide basis and to use school attendance zones (boundaries) as the SCSAs. Utilization of this method created separate service area boundary maps for elementary, middle, and high schools. Each school's attendance boundary is its own SCSA. Existing school attendance zones will remain the SCSA for measuring LOS for each school until they are changed.

This form of SCSA allows the impact of new residential development to be analyzed against the directly impacted schools. The review for available capacity will occur at the schools most likely to be impacted by the new residential development. If available capacity is not present, the adjacent school SCSA will be analyzed for capacity.

Figures 3, 4 and 5 detail the school concurrency service area boundaries for the elementary, middle, and high school grade levels, respectively.

Figure 3 – Elementary Concurrency Service Areas

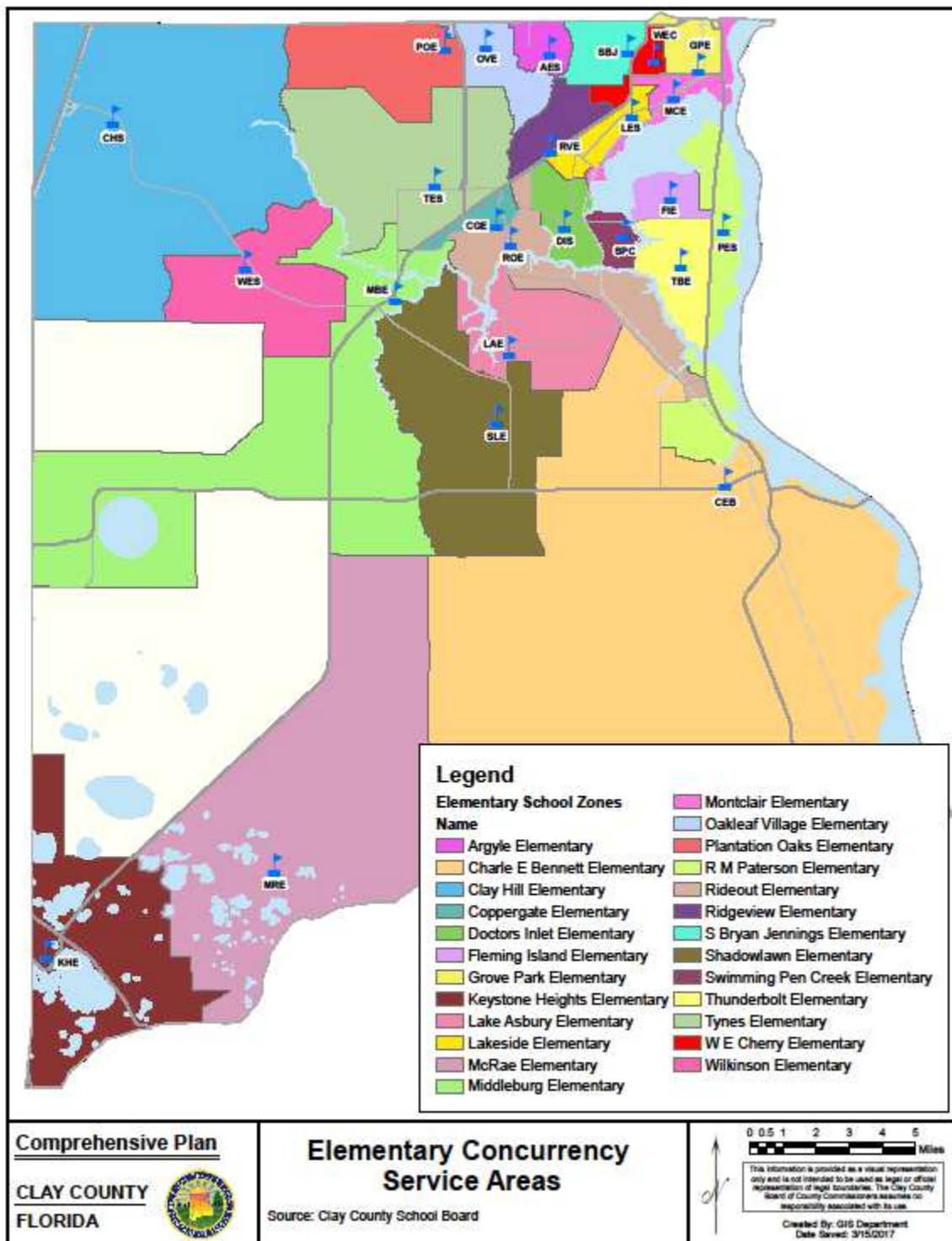


Figure 4 – Junior High Concurrency Service Areas

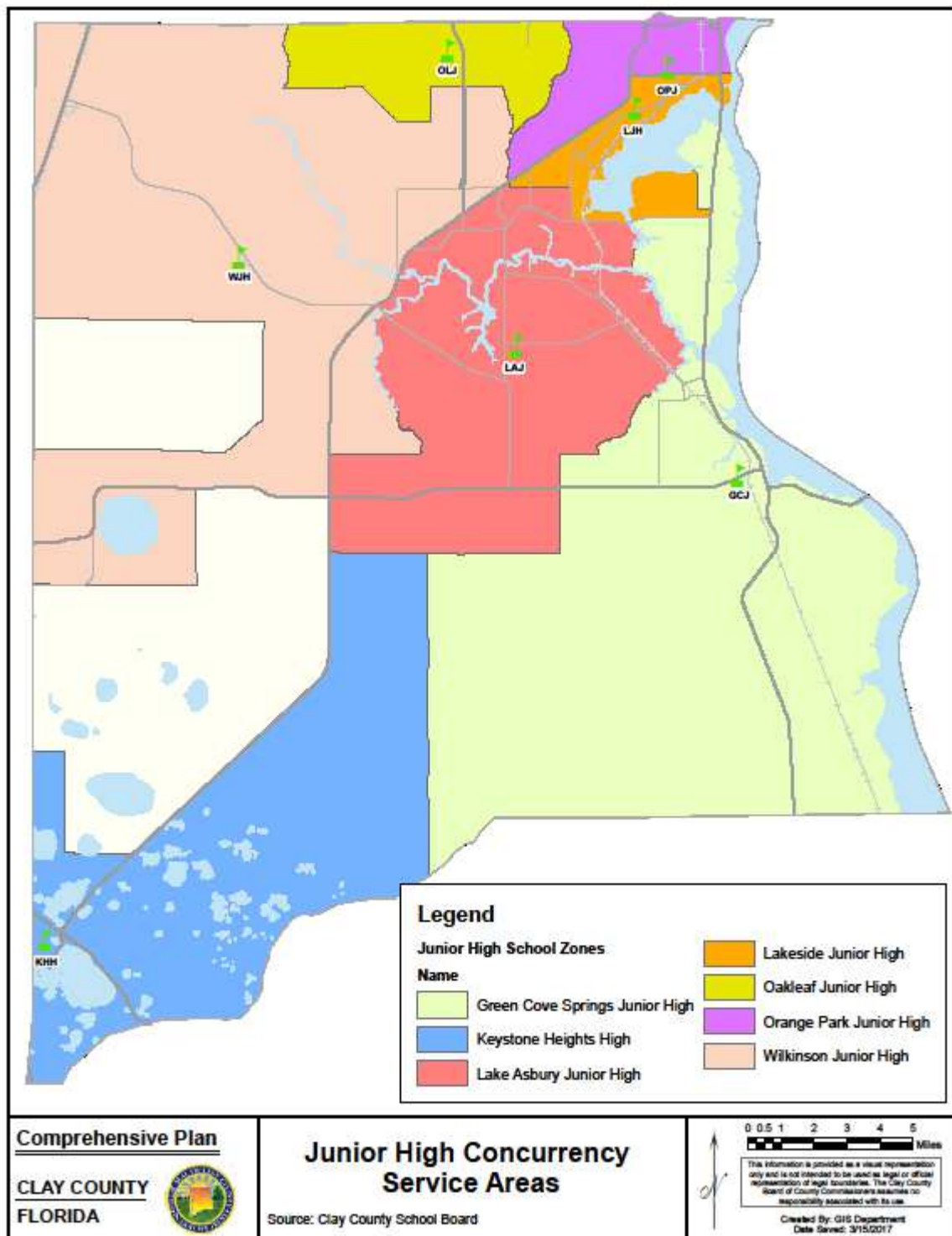
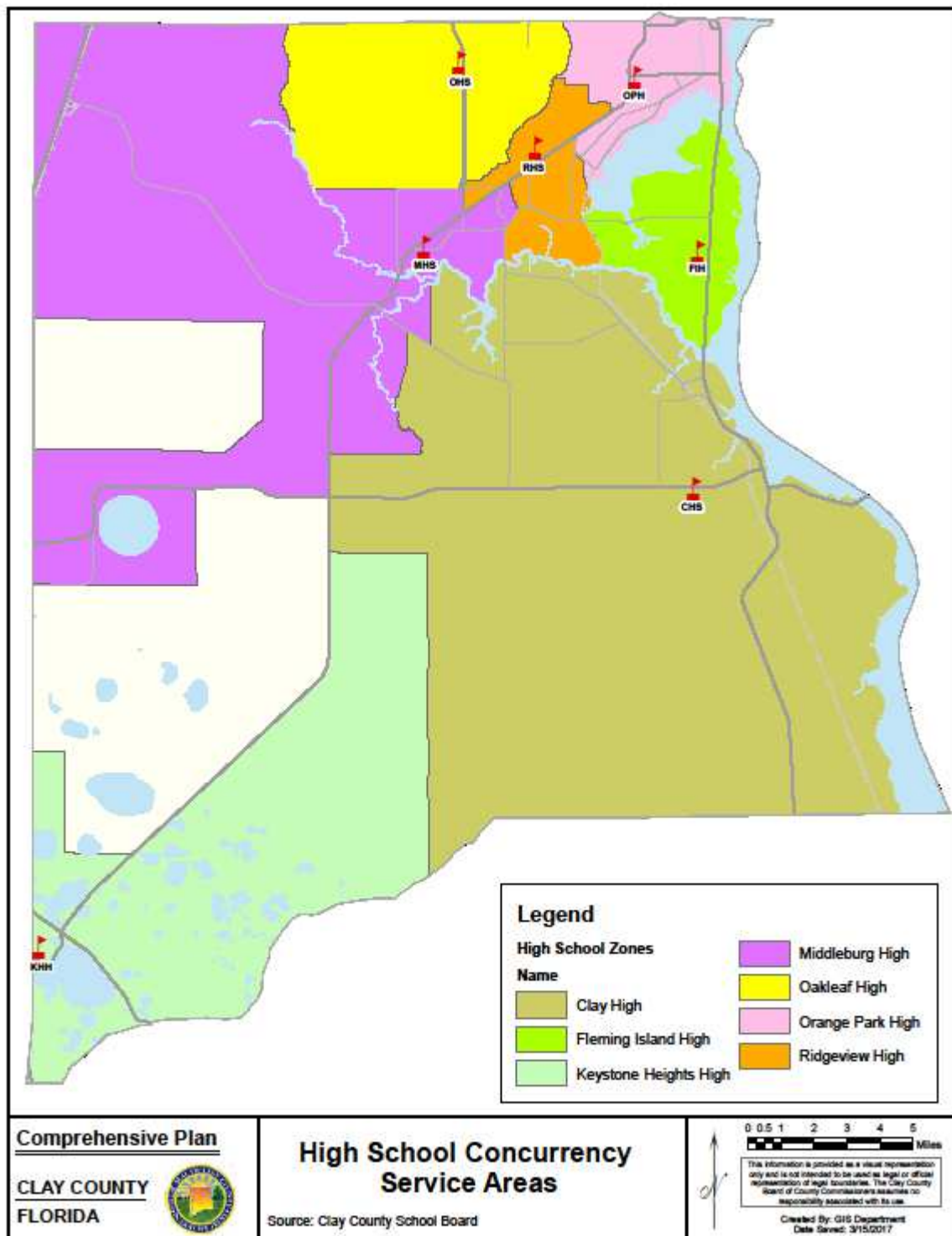


Figure 5 – Senior High Concurrency Service Areas



J. Co-location / Joint-Use Analysis

Prior to its repeal, Rule 9J-5.025 F.A.C. required school districts to address co-location and joint use. Clay County's Interlocal Agreement for Coordinated Planning, Public Educational Facility Siting and Review and School Concurrency (ILA) gives consideration to co-location and shared use in Sections 6, 8, and 9. A co-location map to assist in locating schools to create community focal points or realize a savings with sharing nearby facilities has been provided as a reference in Figure 6.

Budget Considerations

Co-location and shared use of facilities are important tools in budgeting and community building for the School Board, County and Local Governments. According to the ILA when preparing its Educational Plant Survey, the School Board will look for opportunities to co-locate and share use of school and civic facilities. Likewise, co-location and shared use opportunities shall be considered by the Local Governments when updating their Comprehensive Plan schedule of capital improvements, and when planning and designing new or renovating existing community facilities.

Public Opportunity

As a district matures, more leisure and cultural activities become desirable in a community. Junior high and high schools are particularly well equipped to serve as community centers as a result of the higher capacities, parking, and multi-purpose classrooms. Community associations and private organizations serving a range of needs could utilize schools located away from downtown areas. Junior high and high schools should provide opportunities for community use. Elementary schools located in less urban areas may offer opportunities for use of their large rooms, such as cafeterias or libraries.

When preparing its Educational Plant Survey, the School District should look for opportunities to co-locate and share use of school facilities and civic facilities. Co-location and shared use opportunities will be considered by each local government when updating their Comprehensive Plan schedule of capital improvements, and when planning and designing new, or renovating existing, community facilities. For example, opportunities for co-location and shared use shall be considered for libraries, parks, recreation facilities, community centers, auditoriums, learning centers, museums, performing arts centers and stadiums. Co-location and shared use of school and governmental facilities for health care and social services shall be considered where applicable.

School Opportunity

The School District would benefit from joint use of parks adjacent to or in the vicinity of public schools. The County's public golf courses could provide the high schools with more competitive scholastic opportunities through joint use.

As shown in Figure 6, there are opportunities for joint use of existing facilities and proposed school sites or opportunities to plan for joint use with upcoming development. In the Fleming Island area, the proposed junior high school will be located adjacent to the Plantation Sports Complex. The Saratoga Springs DRI will include two proposed schools and another elementary

school is proposed adjacent to the DRI property. The DRI will be including parks within the development presenting an opportunity for joint use with the proposed schools.

Development Opportunity

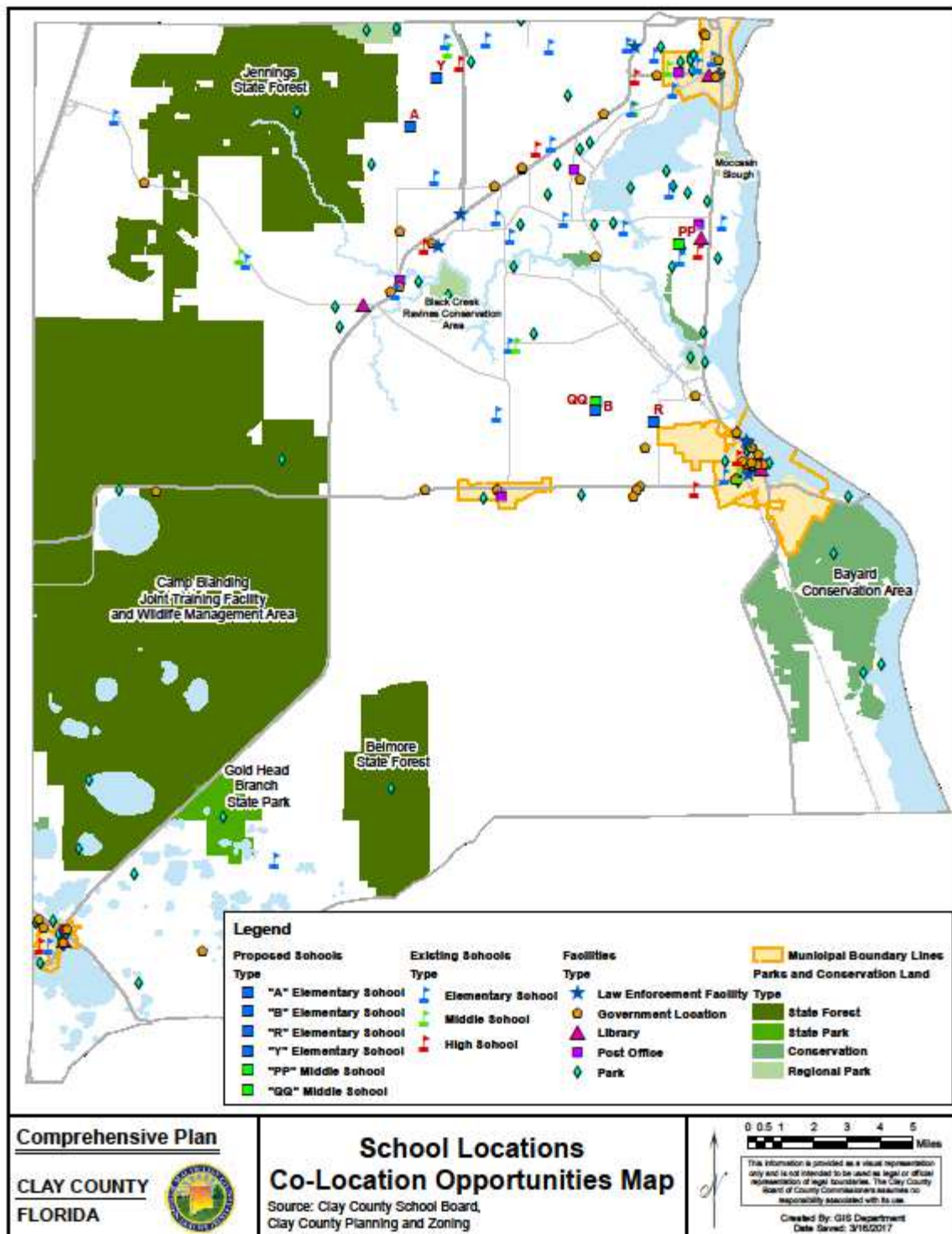
Co-location is intended to provide efficient use of existing infrastructure and discourage sprawl. Identification early in a budget cycle and coordination among agencies will promote successful and effectively utilized public facilities. Cost effective co-location or joint use of School District, County, or City owned property could provide substantial savings for public facilities for existing and future facilities. Through school concurrency, proportionate share options for School District, Local Governments, and developers to consider may include parks and libraries near a planned public school. As residential development proceeds, opportunities for co-location and joint use should be incorporated into public facilities.

Though there are no parks proposed within the Clay County Capital Improvements Plan through fiscal year 2020-2021, there may be opportunities for co-location in future budget cycles. Co-location of proposed school facilities could be accomplished for the elementary school proposed near the intersection of SR 21 and SR 16W, if adequate land is available.

Mutual Use Agreements

For each instance of co-location and shared use, the School District and Local Government shall enter into a separate mutual use agreement addressing legal liability, operating and maintenance costs, scheduling of use, facility supervision, and any other issues that may arise from co-location and joint use.

Figure 6 – Co-Location Opportunities



K. School District Revenue and Capital Improvements

The Educational Facilities Plan (EFP) is prepared annually, as the financially feasible capital plan to meet the capacity needs of the District, pursuant to the requirements of Section 1013.35, Florida Statutes. Prior to the annual adoption, the plan is submitted for review and comment to all affected Local Governments for consistency with their comprehensive plans. Upon School Board adoption, the Local Government will annually adopt by plan amendment into its Capital Improvement Element (CIE).

Five-Year District Facilities Work Program

A component of the EFP is the School District's financially feasible Work Program for a five-year period. The work program must include:

- A schedule of major repair and renovation projects necessary to maintain the educational facilities and ancillary facilities of the School District;
- A schedule of capital outlay projects necessary to ensure the availability of satisfactory student stations for the projected student enrollment;
- The projected cost for each project identified in the work program;
- Revenues anticipated to be available to fund the proposed projects;
- A schedule showing how each project is to be funded; and
- A schedule of options for the generation of additional revenues to fund the work program.

The schedule of capital outlay projects must consider:

- The location, capacities and planned utilization rates of existing facilities;
- The location, capacities and planned use of proposed facilities with emphasis on new facilities to be constructed within the first three years of the work plan;
- Plans for the use and location of relocatable, leased and charter school facilities;
- Alternatives to be used to reduce the need for new permanent student stations;
- The effect of the work plan on class size and utilization rate by grade level;
- The number and percentage of students planned to be educated in relocatables; and
- Plans for the closure of any schools.

An essential component of determining the LOS for schools is the School District's ability to adopt a financially feasible capital program that can achieve and maintain the adopted LOS for public schools. New capacity must be built in time to accommodate the additional students that are projected to be generated as a result of the new residential development, as these developments come on line. If the capacity does not exist to support the students generated by the new development, both the new students and the schools are burdened with overcrowding issues. The Clay County School District's EFP is organized to correct existing deficiencies, attain the adopted LOS, and maximize school utilization. To address the capacity deficiencies, capacity is planned in accordance with an adopted financially feasible Five-Year Capital Improvements Plan.

Capacity Costs Overview

According to the EFP, the cost of construction for new schools is provided by the FDOE. For July 2014, the FDOE reported the student station cost for elementary, middle and high schools to be \$21,194, \$22,886 and \$29,728 respectively. The School District's Project Schedules incorporated in the 2016-17 EFP shows elementary school costs at approximately \$20.5 million,

and junior high schools at approximately \$31.6 million.

The responsibility for funding the capital needs of public schools rests with the School District. The Educational Facilities Plan, which is updated and adopted each year, details the capital improvements and funding available to meet the school capacity needs at the adopted LOS. While it is the School District's responsibility to fund additional capacity with its five-year work program, it is the Local Governments that must annually adopt the School District's capital plan into the Capital Improvements Element of their respective Comprehensive Plans. Therefore, the School District's capital improvements must be supported by a financially feasible capital plan and formally adopted by the School Board. All of the School District's capacity improvements must be contained in the EFP. The EFP identifies how each project addresses school capacity needs, and provides for expansions and new school facilities based on projected population and student growth within areas of the County.

The EFP is the foundation of an annual planning process that allows the School District to effectively address changing enrollment patterns, development and growth, and sustains the facility requirements of high quality educational programs. The Five-Year work program which includes a 10-year and 20-year long range plan is within the EFP, included as Attachment B. It provides the estimated cost of addressing existing deficiencies and future needs, identified by year, for the five-year planning period and for the end of the long-range planning period. These estimated costs address the capacity deficiencies identified in the Long-Term Concurrency Management System (**Tables 19 and 20**) and the long-range planning period, as well as facilities operating costs. **Table 26** below summarizes the short-term and long-term planning priorities for schools, and identifies the estimated costs associated with the construction of these school facilities.

Table 26 – Short and Long Term Planning Period - Planned New Schools

School Years	Priority	School Name	Description	Location	Opening Year	Estimated Cost	# of New Student Stations
2016-17 to 2020-21 (Years 1-5)	1	Y	Elementary	South Oakleaf Area	2018-19	\$20,412,160	862
	Subtotal	1				\$20,412,160	862
2021-22 to 2025-26 (Years 6-10)	2	A	Elementary	Two Creeks Area	2022-23	\$22,597,330	862
	3	R	Elementary	Green Cove Springs	2025-26	\$22,597,330	862
	Subtotal	2				\$45,194,660	1,724
2026-27 to 2036-37 (Years 10-20)	4	QQ	Junior High	Saratoga Springs	2028-29	\$31,621,153	1,117
	5	B	Elementary	Saratoga Springs	2031-32	\$22,597,330	862
	6	PP	Junior High	Fleming Island	2036-37	\$31,621,153	1,117
	Subtotal	3				\$85,839,636	3,096
Grand Total		6				\$151,446,456	5,682

Source: Clay County School District 2017

School District Revenue Sources

The Clay County School District relies on local and state funding sources to provide funds that address the new construction and renovation needs of existing school facilities.

The School District receives State funding for capital outlay based on statutory restrictions of use. State capital outlay funding sources are derived from motor vehicle license tax revenue, known as Capital Outlay and Debt Service funds (CO&DS) and gross receipts tax revenue from utilities Public Education Capital Outlay funds (PECO).

The primary local funding sources are property taxes, impact fees, and bonds. According to Florida Statutes, school districts may levy up to 2 mills without an election to help fund the School District capital program. The Summary of Revenues and Expenditures, shown in **Table 27**, available for only new construction and remodeling projects is provided below. Detailed tables of the School District's Capital Outlay expenditures and revenue sources are provided within the EFP.

Table 27 – Revenue and Expenditures

School Year	2016-2017	2017-2018	2018-2019	2019-2020	2020-2021	Five Year Total
Total Revenues	\$24,141,478	\$23,905,733	\$28,633,572	\$34,508,884	\$41,553,713	\$152,743,380
Total Project Costs	\$8,762,065	\$4,960,000	\$3,725,000	\$2,505,000	\$2,190,000	\$22,142,065
Remaining Funds	\$15,379,413	\$18,945,733	\$24,908,572	\$32,003,884	\$39,363,713	\$130,601,315

Source: Clay County School District Educational Facilities Plan, 2016/17-2021/22

The School District is required to have adequate classroom capacity to meet the population needs over the next five years, at the stated tiered LOS standards. This is stated in the Five-Year Capital Plan. Additional items to be addressed by the Five-Year Capital Plan include modernizations, school and technology upgrades, and significant school renovation and maintenance.

Identification and assessment of revenue sources and funding mechanisms available for school capital improvement financing for the initial five years and long range planning period include:

- Projection of ad valorem tax base
- Assessment ratio and millage rate
- Additional revenue sources (impact fees, etc.)
- Projection of debt capacity
- Projections of debt service obligations for currently outstanding bond issues

In addition, the School District relies on BCC Local Option Sales Tax funds received from the County and derived from the voter approved one-cent sales tax, as well as the Educational

Facility Impact Fees, which are assessed on a County-wide basis to cover the costs of public

school facilities necessitated by growth and development.

School impact fees are charges paid by new residential development (i.e. houses, apartments, mobile home and other residential construction) that potentially generates public school enrollment. School impact fees are not imposed to cover the full cost of new school capacity but rather to cover an amount equal to the difference between the total cost and the other available sources of revenue appropriated for capital facilities. The process established for the calculation of impact fees within Clay County is provided as Attachment D. Impact fees can only be charged for that portion of the cost of public facilities that are attributable to the new development, and cannot be used to pay the cost of reducing existing deficiencies.

The current school impact fees in Clay County are:

Single-Family - \$7,034 per dwelling unit
Multi-Family - \$3,236 per dwelling unit
Mobile Home - \$5,979 per dwelling unit

In addition, the School District may levy Certificates of Participation (COPS) amounts which are determined by district administration and reviewed and approved by the Board. Proceeds from the issuance of these certificates can be used to acquire land and finance capital projects. The School District does not need voter approval to use COPS as a funding source.

Supporting Infrastructure Needs

The coordinated school planning effort improves communication and budget allocations while preparing a financially feasible Five-Year Educational Facilities Plan. Clay County's ILA identifies mutual obligations for supporting infrastructure needs for existing and projected schools (water, sewer, roads, drainage, sidewalks, bus stops, etc.) These obligations are enumerated in Section 8 of the ILA and as follows:

1. Sidewalks along roads contiguous to the school site shall be provided at the School Board's expense unless determined to be an obligation imposed by the developer/builder consistent with the local governments' regulations.
2. Acceleration/deceleration/by-pass lanes shall be provided on roads contiguous to the school site at the School Board's expense.
3. School cross-walk pavement striping on roads contiguous to School Board property shall be provided at the School Board's expense.
4. School zone flashing lights on roads not contiguous to School Board property shall be provided at the local government's expense.
5. Any traffic signals that are required by the local government located on county roads not contiguous to School Board property shall be provided at the local government's expense.
6. Sidewalks shall be provided at the local government's expense consistent with the commitments in the local government response to the Siting Report.

7. School warning signs and student cross-walk pavement striping on public roads not contiguous to School Board property shall be provided at the local government's expense.
8. Reduced speed limit zones and signage shall be provided by the local government.
9. Water and sewer lines required to be extended to serve the educational or ancillary facility shall be provided at the School Board's expense. This provision is not intended to require the School Board to dedicate property or pay for improvements or construction of facilities of a general district-wide or regional nature which exceeds the School Board's proportionate share of the cost. By virtue of this subsection, the School Board is not waiving any local governmental responsibility for reimbursement per Chapter 1013, F.S.
10. No permit fee or any other fee, expense or cost of any type shall be required of the School Board by the County or local governments for any review or processing contemplated by this Agreement. The County, the Local Governments and the School Board acknowledge and agree that although each party may incur costs as a result of compliance with this Agreement, each party shall absorb its own costs in furtherance of cooperation.

The mutual obligations listed above provide both the School District and the Local Governments with a clear understanding of the financial obligations they are responsible for when planning improvements associated with existing and proposed schools.

Public schools are essential public infrastructure needed to support the development of students with the community. As such, the School District, County and Local Governments will coordinate through the process established in the ILA to ensure that necessary public school facilities are appropriately located with the infrastructure necessary to support the school, prior to the student impact from residential development.

L. 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 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 Public School Facilities 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 Public School Facilities 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 Public School Facilities 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 Public School Facilities 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 Public School Facilities Element objectives or policies that directly relate to or otherwise impact this issue.

M. Matrix for Evaluating Plan Policies

As part of the evaluation of the 2025 Comprehensive Plan's Public School Facilities Element, the County evaluated 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?
- 7.

Public School Facilities	Measurable Target	Defined Terms	Achieved	Major Issue	Statute Requires	Supports Others	Observations
GOAL 1	Yes	No	Yes	No			Add definitions for Educational Facilities Plan (EFP), school capacity and school district
OBJ 1.1	Yes	No	No	No	Yes	Yes	References the Capital Improvements Element. Add definitions for level of service standard and school board; need to update tables annually
POLICY 1.1.1	No	No	Yes	No	Yes	Yes	
POLICY 1.1.2	Yes	No	No	No	Yes	Yes	References the Capital Improvements Element. Need to update tables annually

Public School Facilities	Measurable Target	Defined Terms	Achieved	Major Issue	Statute Requires	Supports Others	Observations
POLICY 1.1.3	No	No	No	No	Yes	Yes	References the Capital Improvements Element. Add definition for public school facilities and existing public school facilities; although EFP is reviewed annually, the maps have not been updated in the element; consider amending policy to add date for accountability
POLICY 1.1.4	No	No	No	No	Yes	Yes	References the Capital Improvements Element. Add definition for long-term concurrency management system; update the CIE with appropriate tables and amend policy to include a date for accountability
OBJ 1.2	No	No	Yes	No	Yes	Yes	Add definition for level of service
POLICY 1.2.1	Yes	No	Yes	No	Yes	Yes	Add definitions for concurrency service area, core cafeteria capacity, Florida Inventory of School Houses (FISH) Capacity
POLICY 1.2.2	No	No	Yes	No	Yes	Yes	Revise dates
POLICY 1.2.3	No	No	Yes	No	Yes	Yes	Consider including a date for accountability
POLICY 1.2.4	Yes	No	Yes	No	Yes	Yes	Add definition for Oversight Group;
POLICY 1.2.5	Yes	No	Yes	No	No	Yes	
OBJ 1.3	No	No	Yes	No	Yes	Yes	
POLICY 1.3.1	Yes	No	Yes	No	Yes	Yes	Add definitions for application and school concurrency reservation letter
POLICY 1.3.2	Yes	No	Yes	No	Yes	Yes	Add definition for dwelling unit
POLICY 1.3.3	No	No	Yes	No	Yes	Yes	Add definition for school concurrency deficiency letter. The ldrs have time limits for processing; revise policy number within text
POLICY 1.3.4	Yes	No	Yes	No	Yes	Yes	Add definition for proportionate share mitigation
POLICY 1.3.5	No	No	Yes	No	Yes	Yes	Consider adding time limits
POLICY 1.3.6	No	No	Yes	No	Yes	Yes	Consider adding time limits, add definition for concurrency reservation certificate
OBJ 1.4	No	N/a	Yes	No	No	Yes	This Objective contains items from former statute requirements (co-location)
POLICY 1.4.1	No	No	Yes	No	No	Yes	Add definition for Public Schools Interlocal Agreement (PSILA), not statutory but part of PSILA
POLICY 1.4.2	No	N/a	Yes	Yes	No	Yes	No longer in statutes
POLICY 1.4.3	No	N/a	Yes	No	Yes	Yes	

Public School Facilities	Measurable Target	Defined Terms	Achieved	Major Issue	Statute Requires	Supports Others	Observations
POLICY 1.4.4	No	No	Yes	No	Yes	Yes	
POLICY 1.4.5	Yes	No	Partial	No	Yes	Yes	
POLICY 1.4.6	No	No	Yes	No	Yes	No	This was accomplished; delete policy
POLICY 1.4.7	No	N/a	Yes	No	No	No	EOC is responsible for this and does have plans for shelters and long term evacuations

N. Assessment of Changes to Florida Statutes

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

2011 Legislation ("Community Planning Act")

- Deletes requirements for public schools interlocal agreements with respect to submittal of the agreements to the state land planning agency based on an established schedule and other requirements involving the state land planning agency related to waivers and exemptions. No amendment necessary.
- Deletes parks and recreation, schools and transportation from the list of public facilities and services subject to the concurrency requirement on a statewide basis. No amendment necessary.
- Sets forth concurrency provisions for public education, setting forth provisions for those local governments that apply concurrency to public education. If a county and one or more municipalities that represent at least 80 percent of the total countywide population have adopted school concurrency, the failure of one or more municipalities to adopt the concurrency and enter into the interlocal agreement does not preclude implementation of school concurrency within jurisdictions of the school district that have opted to implement concurrency. [Section 163.3180(6)(a)] No amendment necessary.
- Modifies school concurrency provisions to remove requirement for financial feasibility and to require that facilities necessary to meet adopted levels of service during a 5-year period are identified and consistent with the school board's educational facilities plan. No amendment necessary.
- Modifies school concurrency provisions to allow a landowner to proceed with development of a specific parcel of land notwithstanding a failure of the development to satisfy school concurrency if certain factors are shown to exist, including adequate facilities are provided for in the capital improvements element and school board's

educational facilities plan, demonstration that facilities needs can be reasonably provided, and the local government and school board have provided a means by which proportionate share is assessed. No amendment necessary.

2012 Legislation

- Moves the exemptions from having a public school interlocal agreement from section 163.3180(6)(i) to section 163.31777(3). No amendment necessary.
- Adds language stating that an amendment that rescinds concurrency shall be processed under the expedited state review process, and is not required to be transmitted to reviewing agencies for comment, except for agencies that have requested transmittal, and for municipal amendments, it must be transmitted to the county. A copy of the adopted amendment shall be transmitted to the state land agency. If the amendment rescinds transportation or school concurrency, the adopted amendment must also be sent to the Department of Transportation or Department of Education, respectively. No amendment necessary.
- Provides general rewording. Adds language to clarify that the choice of one or more municipality to not adopt school concurrency does not preclude implementation of school concurrency within other jurisdictions of the school district. No amendment necessary.

O. Conclusions and Proposed Revisions

The Comprehensive Plan is substantively up-to-date and the County has done a good job of implementing its Public School Facilities Element. Most necessary amendments are those as required by changes in State law, or to provide greater emphasis on issues of particular importance to Clay County.

- 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 Public School Facilities Element. New (added) language is underlined and removed (deleted) language is ~~struck through~~.

Proposed Amendment to Policy 1.2 (PSF Policy 1.1.2)

Delete the statutory content requirements for the EFP as it is prepared by others.

PSF POLICY 1.1.2

The County shall, no later than December 1st of each year, incorporate into the Capital Improvements Element the “Summary of Capital Improvements Program” and “Summary of Estimated Revenue” tables from the School District’s annually adopted Five-Year Educational Facilities Plan (EFP).

~~The EFP shall be consistent with the requirements of Section 1013.35, F.S., and include projected student populations apportioned geographically, an inventory of existing school facilities, projections of facility space needs, information on relocatables, general locations of~~

~~new schools for the 5, 10, 20-year time periods, and options to reduce the need for additional permanent stations.~~

Proposed Amendment to Policy 1.4 (PSF Policy 1.1.4)

Add a date for accountability.

PSF POLICY 1.1.4

The Long-Term Concurrency Management System, which shall be annually updated to address the adopted LOS of schools identified in Table 1, shall be incorporated into the annually adopted Five-Year Educational Facilities Plan and included in the Capital Improvements Element in the “Summary of Capital Improvements Program” no later than December 1st of each year.

Proposed Amendment to Objective 2 (PSF Objective 1.2)

Added text for clarity.

PSF OBJECTIVE 1.2 Achieve and maintain adequate school facilities in Clay County by adopting a long-term concurrency management system to which, addresses school facility level of service and the need for correction of school facility deficiencies through the long-term planning period.

Proposed Amendment to Policy 2.2 (PSF Policy 1.2.2)

Revised dates.

PSF POLICY 1.2.2

The County recognizes the School District's Long-Term Concurrency Management System (LTCMS) established to provide the necessary enrollment relief required to achieve and maintain the adopted LOS for public schools. The LTCMS achieves the adopted LOS through school year 204725-48~~26~~.

Proposed Amendment to Policy 2.3 (PSF Policy 1.2.3)

Add a date for accountability and revised policy reference to new numbering system.

PSF POLICY 1.2.3

The County hereby adopts the School Board's public school attendance boundaries, as the School Concurrency Service Areas (SCSA). The SCSAs will be amended ~~annually~~ no later than December 1st of each year pursuant to Policy 1.2.4.

Proposed Amendment to Policy 3.3 (PSF Policy 1.3.3)

Revised policy reference to new numbering system.

PSF POLICY 1.3.3

The County, through its land development regulations, shall establish a school concurrency review process for all residential projects (seeking site plan, plat, or the functional equivalent) that are not exempt under Policy 1.3.2. The minimum process requirements are described below:

[NO CHANGES PROPOSED TO PORTION OF POLICY NOT SHOWN]

*Proposed Amendment to Policy 4.1 (PSF Policy 1.4.1)
Revised to include the correct ILA name and acronym.*

PSF POLICY 1.4.1

The County shall encourage the location of schools near residential areas by:

- a. Assisting the School District in the identification of funding and/or construction opportunities (including developer participation or County capital budget expenditures) for sidewalks, traffic signalization, access, water, sewer, drainage and other infrastructure improvements consistent with the obligations identified in the Public Schools Interlocal Agreement (PSILA).
- b. Reviewing and providing comments on all new proposed school sites consistent with the PSILA.
- c. Allowing schools within all land use categories, except industrial and mining, consistent with the PSILA.

*Proposed Amendment to Policy 4.6 (PSF Policy 1.4.6)
Delete policy as concurrency provisions have been added to the Land Development Regulations.*

PSF POLICY 1.4.6

~~No later than the date this element becomes effective, the County shall adopt school concurrency provisions into its Land Development Regulations (LDR).~~

*Proposed Amendment to Policy 4.7 (PSF Policy 1.4.6)
Renumbered policy due to prior deleted policy.*

PSF POLICY 1.4.7~~6~~

The Local Governments in conjunction with the School District shall identify issues relating to public school emergency preparedness, such as:

- a. The determination of evacuation zones, evacuation routes, and shelter locations.
- b. The design and use of public schools as emergency shelters.

The designation of sites other than public schools as long-term shelters, to allow schools to resume normal operations following emergency events.

P. Attachments

ATTACHMENT A

Interlocal Agreement

ATTACHMENT B

Educational Facilities Plan, Revision A FY 2016/17-2021/22

ATTACHMENT C

Educational Plant Survey

EXHIBIT K

INTRODUCTION

PURPOSE AND INTENT OF THE PUBLIC SCHOOL FACILITIES ELEMENT

The Public School Facilities Element (PSF) establishes the public school concurrency system requirements, including an adopted level of service (LOS) standard for public schools and procedures for establishing a long-term concurrency management system to achieve and maintain the adopted LOS. School concurrency requires coordinated school planning among the County, the School District and the municipalities within Clay County to ensure that public school capacity needs are met and that the public school facilities, necessary to achieve and maintain the adopted level of service for schools, are in place before or concurrent with the school impacts of new residential development.

The PSFE focuses on coordinated planning among the School District, County and local governments to accommodate future student growth needs in the public school system. The PSF addresses school level of service; school utilization; school proximity and compatibility with residential development; availability of public infrastructure; colocation opportunities; and financial feasibility.

Within Clay County, the local governments participating in school concurrency are Clay County, the Town of Orange Park, the City of Green Cove Springs and Keystone Heights, (hereinafter referred to as “Local Governments”). The fourth municipality in the County, the Town of Penney Farms, is exempt from school concurrency based on the criteria contained in 163.31777(3), F.S. At the time of its comprehensive plan’s evaluation and appraisal report, the Town of Penney Farms will determine if it continues to meet the criteria as an exempt municipality. If the School District plans a school to be constructed in the Town, it will then be required to adopt the school concurrency requirements.

PSF GOAL 1

To provide a public school system that offers a high quality educational environment, provides accessibility for all of its students, and ensures adequate school capacity to accommodate enrollment demand within a financially feasible School District Educational Facilities Plan (EFP).

PSF OBJ 1.1

No later than December 1 each year, the County shall annually adopt into its Capital Improvement Element that portion of the School Board's Educational Facilities Plan (EFP) providing a five-year schedule and long term schedule of capital improvements which include those necessary school capacity projects to address existing deficiencies and future needs to achieve and maintain the adopted level of service standard for public schools.

PSF POLICY 1.1.1

When the School Board transmits to the County the draft Tentative Educational Facilities Plan, the County shall review the plan for consistency with the comprehensive plan. Based upon the review, the County shall provide to the School Board written comments and recommendations regarding the timing and location of future schools and related County infrastructure.

PSF POLICY 1.1.2

The County shall, no later than December 1st of each year, incorporate into the Capital Improvements Element the "Summary of Capital Improvements Program" and "Summary of Estimated Revenue" tables from the School District's annually adopted Five-Year Educational Facilities Plan (EFP).

PSF POLICY 1.1.3

Local Governments, in conjunction with the School District, shall annually review the Public School Facilities Element and maintain a long-range public school facilities map series, including the planned general location of schools and ancillary facilities for the five-year planning period and the long-range planning period. The map series, included as Appendix A, shall include at a minimum maps showing:

- a. Existing public school facilities by type and location of ancillary plants.
- b. Public school facilities and ancillary plants generally planned for the five-year planning period.

The Future Land Use and Capital Improvements Elements shall be utilized for joint planning purposes in the selection of the general locations of new schools.

PSF POLICY 1.1.4

The Long-Term Concurrency Management System, which shall be annually updated to address the adopted LOS of schools identified in Table 1, shall be incorporated into the annually adopted Five-Year Educational Facilities Plan and included in the Capital Improvements Element in the "Summary of Capital Improvements Program" no later than December 1st of each year.

PSF OBJ 1.2 **Achieve and maintain adequate school facilities in Clay County by adopting a long-term concurrency management system to which, addresses school facility level of service and the need for correction of school facility deficiencies through the long-term planning period.**

PSF POLICY 1.2.1

The County hereby adopts 110 percent Level of Service (LOS) standard for each public school type in each School Concurrency Service Area (SCSA), based upon the lesser of total Florida Inventory of School Houses (FISH) capacity or core cafeteria capacity.

PSF POLICY 1.2.2

The County recognizes the School District's Long-Term Concurrency Management System (LTCMS) established to provide the necessary enrollment relief required to achieve and maintain the adopted LOS for public schools. The LTCMS achieves the adopted LOS through school year 2025-26.

PSF POLICY 1.2.3

The County hereby adopts the School Board's public school attendance boundaries, as the School Concurrency Service Areas (SCSA). The SCSAs will be amended no later than December 1st of each year pursuant to Policy 1.2.4.

PSF POLICY 1.2.4

The County and the School District, shall utilize the following procedures for modifying SCSAs:

- a. The School District will transmit a proposed SCSA modification with data and analysis to support the change to the Local Governments and the Oversight Group. Any proposed change to the SCSAs shall require a demonstration by the School District that the change complies with the public school LOS standard and that utilization of school capacity is maximized to the greatest extent possible.
- b. Local Governments and the Oversight Group will review the proposed modification and send their comments to the School District within 45 days of receipt of the proposed change.
- c. The modification of the SCSAs shall be effective upon adoption by the School Board. The County shall amend its SCSA map series in the Data and Analysis to include the new SCSAs no later than 45 days following School Board adoption. The new SCSAs shall serve as the basis for determination of available capacity upon adoption by the School Board.

PSF POLICY 1.2.5

The Local Governments in conjunction with the School District shall observe the following process for changes in the use of schools:

- a. At such time as the School District determines that a change in the school facility type or use is appropriate, the School District shall transmit the proposed changes with supporting data and analysis for the changes to the Local Governments.
- b. Local Governments will review the proposed changes and send their comments to the School District within 45 days of receipt of the proposed change.
- c. The change in facility utilization shall become effective upon final approval of the new use of the school by the School Board.

PSF OBJ 1.3

Ensure a school concurrency evaluation is performed by the Clay County School District for all non-exempt residential development, in order to verify new students can be accommodated within the adopted level of service as measured within each SCSA for adequate school facility capacity.

PSF POLICY 1.3.1

The County shall not approve any non-exempt residential development applications for rezoning, preliminary plat, site plan or their functional equivalents until the School District has issued a School Concurrency Reservation Letter (SCRL) verifying available capacity.

PSF POLICY 1.3.2

The County shall consider the following residential uses exempt from the requirements of school concurrency:

- a. All single family lots of record at the date the adopted Public School Facilities Element becomes effective.
- b. Any subdivision of land created pursuant to the County or City Land Development Regulations that does not require the recording of a Plat.
- c. Any Development of Regional Impact for which a development order was issued prior to July 1, 2005 or for which a Development of Regional Impact application has been submitted prior to May 1, 2005.
- d. Any new residential development that has a preliminary plat or site plan approval or the functional equivalent for a site-specific development order prior to the date the adopted Public School Facilities Element becomes effective.
- e. Any amendment to any previously approved residential development, which does not increase the number of dwelling units or change the type of dwelling units (single-family to multi-family, etc.).
- f. Any age restricted community with no permanent residents under the age of 18. Exemption of an age restricted community shall be subject to a restrictive covenant limiting the age of permanent residents to 18 years and older.

PSF POLICY 1.3.3

The County, through its land development regulations, shall establish a school concurrency review process for all residential projects (seeking site plan, plat, or the functional equivalent) that are not exempt under Policy 1.3.2. The minimum process requirements are described below:

- a. A residential development application is submitted to the County, which includes a Concurrency Application for review by the School District.
- b. The County determines application is complete for processing and shall transmit the Concurrency Application to the School District for review.
- c. The School District shall review applications for available capacity and issue a School Concurrency Reservation Letter (SCRL) to the County:
 1. If capacity is available within the affected SCSA, the School District shall issue a SCRL verifying available capacity.
 2. If capacity is not available within the affected SCSA, contiguous SCSAs are reviewed for available capacity.
 3. If capacity is available in the contiguous SCSAs, the School District shall issue a SCRL verifying available capacity in the adjacent SCSA.
 4. If capacity is not available in the contiguous SCSAs, the School District shall issue a School Concurrency Deficiency Letter (SCDL) indicating that capacity is not available to accommodate the proposed development.

PSF POLICY 1.3.4

The School District, in conjunction with the County, shall review developer proposed proportionate share mitigation proposals which will add the school capacity required to satisfy the impacts of a proposed residential development during a 90-day negotiation period. Mitigation options, considered by the School District, may include but are not limited to:

- a. Contribution of land and/or a monetary payment in conjunction with the provision of additional school capacity; or
- b. Provision of additional student stations through the donation of buildings for use as a primary or alternative learning facility; or
- c. Provision of additional student stations through the renovation of existing buildings for use as learning facilities; or
- d. Construction of permanent student stations or core capacity; or
- e. Construction of a school in advance of the time set forth in the School District's EFP; or
- f. Construction of a charter school designed in accordance with School District standards, providing permanent capacity to the District's inventory of student stations. Use of a charter school for mitigation must include provisions for its continued existence, including

but not limited to the transfer of ownership of the charter school property and/or operation of the school to the School Board.

PSF POLICY 1.3.5

The County shall, upon acceptance by the School Board of a mitigation agreement, enter into an enforceable binding agreement with the School District and the developer, and the School District shall issue a SCRL. Failure to reach agreement shall result in the issuance of a SCDL indicating that there is no available capacity to service the development.

PSF POLICY 1.3.6

The County shall be responsible for notifying the School District when a residential development has received a Concurrency Reservation Certificate (CRC), and/or when the development order for the residential development expires or is revoked. In cases of expiration or revocation, the existing SCRL is forfeited.

PSF OBJ 1.4

The Local Government or County shall coordinate with the School District to ensure that all new public schools will be located to serve as community focal points, proximate to existing and proposed residential areas they will serve and, to the extent possible, will be co-located with other compatible public facilities, such as parks, libraries, and community centers, and are located consistent with the appropriate jurisdiction's future land use map designation. The coordination will include planning to ensure safe access to schools with needed supporting infrastructure, including sidewalks, bicycle paths, turn lanes, signalization.

PSF POLICY 1.4.1

The County shall encourage the location of schools near residential areas by:

- a. Assisting the School District in the identification of funding and/or construction opportunities (including developer participation or County capital budget expenditures) for sidewalks, traffic signalization, access, water, sewer, drainage and other infrastructure improvements consistent with the obligations identified in the Public Schools Interlocal Agreement (PSILA).
- b. Reviewing and providing comments on all new proposed school sites consistent with the PSILA.
- c. Allowing schools within all land use categories, except industrial and mining, consistent with the PSILA.

PSF POLICY 1.4.2

The County, in conjunction with the School District, shall seek opportunities to co-locate public facilities with schools, such as parks, libraries, and community centers, as the need for these facilities is identified.

PSF POLICY 1.4.3

The County, in conjunction with the School District, shall jointly determine the need for and timing of on-site and off-site improvements necessary to support a new school.

PSF POLICY 1.4.4

The County shall enter into an agreement with the School Board identifying the timing, location, and the party or parties responsible for constructing, operating, and maintaining off-site improvements necessary to support a new school.

PSF POLICY 1.4.5

The County hereby designates the Oversight Group as the monitoring group for coordinated planning and school concurrency in Clay County.

PSF POLICY 1.4.6

The Local Governments in conjunction with the School District shall identify issues relating to public school emergency preparedness, such as:

- a. The determination of evacuation zones, evacuation routes, and shelter locations.
- b. The design and use of public schools as emergency shelters.
- c. The designation of sites other than public schools as long-term shelters, to allow schools to resume normal operations following emergency events.

Definitions

Applicant or Developer or Owner means any individual, corporation, business trust, estate trust, partnership, association, two or more persons who have a joint or common interest, governmental agency, or any other legal entity, which has submitted an Application for a Concurrency Reservation Certificate.

Application means an application presented to the County containing the information required pursuant to this Ordinance.

Concurrency Reservation Certificate the official document issued to the applicant by the Director or the Director's Designee upon receipt of the School Concurrency Reservation Letter by the School District.

Concurrency Service Area or CSA is the geographical area in which the level of service is measured when an application for residential development is reviewed for school concurrency purposes.

Core Cafeteria Capacity means the total number of student stations allocated for the cafeteria, which is the cafeteria plus any contiguous multi-purpose area combined.

Development Proposal means an application for any approval of the following types of residential development, or a phase thereof or amendments thereto: final plat approval for single-family or townhome development, construction plan approval for multifamily (apartments and condos) development, or the functional equivalent thereof.

Development Review Table a schedule maintained by the School District and the County that tracks the availability of School Capacity over time.

Director means the Director of Planning and Zoning.

Dwelling Unit means a room or rooms connected together, constituting a separate, independent housekeeping establishment for a family, for owner occupancy or rental or lease on a weekly, monthly, or longer basis, and physically separated from any other rooms or dwelling units which may be in the same structure, and containing sleeping, sanitary, and kitchen facilities.

Educational Facilities Plan (EFP) The School District's annual comprehensive capital planning document, that includes long range planning for facility needs over a five-year, ten-year and twenty-year planning horizon, which includes the Five-Year Facility Work Plan which is annually adopted by Clay County School Board, County and municipalities for school concurrency.

Existing Public School Facilities Public School Facilities that are already constructed and operational at the time that the School District Designee makes a finding regarding School Capacity.

Finding of Available School Capacity a determination by the School District Designee that Public School Concurrency exists, based on the projected impacts of the Development Proposal.

Florida Inventory of School Houses (FISH) Capacity the report of the permanent and relocatable capacity of existing public school facilities. The FISH capacity is the number of students that may be housed in a facility (school) at any given time based on a percentage (100% elementary, 90% middle and 95% high) of the total number of existing student stations and a designated size for each program.

Full-Time Equivalent (FTE) Student Count – Fall Semester A fall semester count of all “full-time equivalent” students, pursuant to Chapter 1011.62, F.S.

Level of Service the comparison of public school enrollment to School Capacity in a given Concurrency Service Area.

Level of Service Standard (LOS Standard) the Level of Service applied to Concurrency Service Areas that are adopted in the Public Schools Interlocal Agreement (PSILA) and the Public Schools Facilities Element for each level or type of Public School Facility.

Long-Term Concurrency Management System (LTCMS) a ten-year plan established to provide the necessary enrollment relief required to achieve and maintain the adopted LOS for public schools.

Oversight Group a group established to review Educational Facilities Plans and to assess the effectiveness of Joint School Planning and School Concurrency and comprised of at a minimum, the County Planning and Zoning Director, the Concurrency Manager, the Facilities Director (school), the Planner (school), Budget Director representatives from the county and Orange Park, a Northeast Regional Council representative and community representatives.

Planned Public School Facilities Public School Facilities in the School District’s Work Program that will be in place or under actual construction within three (3) years after the approval of the Development Proposal.

Proportionate Share Mitigation a developer improvement or contribution identified in a binding and enforceable agreement between the Developer, the School Board and the local government with jurisdiction over the approval of the development order to provide compensation for the additional demand on deficient public facilities created through the residential development of property, as set forth in Section 163.3180 F.S.

Public School Concurrency as provided in Section 163.3180, F.S., a finding that the necessary Public School Facilities to maintain Level of Service Standards are in place or are scheduled in the Work Program to be under actual construction within three (3) years of approval of a Development Proposal.

Public School Facilities public school buildings provided by the School District, as defined by the most current edition of the Florida Inventory of School Houses (FISH), published by the Florida Department of Education, Office of Educational Facilities, or land for a Public School Facility.

Public Schools Interlocal Agreement (PSILA) (entitled “Interlocal Agreement for Coordinated Planning, Public Educational Facility Siting and Review and School Concurrency in Clay County” and included in the Appendix) the interlocal agreement between the County, non-exempt municipalities, and the School District, pursuant to Section 163.31777, F.S. which establishes standards and procedures for a coordinated, uniform Public School Concurrency program throughout Clay County and which coordinates the provision of Level of Service Standards for Public School Facilities.

School Board the governing body of the School District of Clay County, a body corporate pursuant to Section 1001.41, F.S.

School Capacity the demand that can be accommodated by a Public School Facility at the Level of Service Standard, as determined by the School District.

School Concurrency Application an application for the School District to make a Finding of Available School Capacity and issue a School Concurrency Reservation Letter.

School Concurrency Deficiency Letter (SCDL) a determination by the School District Designee that Public School Concurrency has not been achieved, based on the projected impacts of the Development Proposal.

School Concurrency Reservation Letter (SCRL) a reservation of School Capacity made by the School District after a Finding of Available School Capacity. The reservation shall be indicated on the Development Review Table.

School District the School District of Clay County

School District Designee a person or committee designated to act on behalf of the School District, and to make determinations regarding whether Public School Concurrency has been achieved for School Concurrency Applications submitted to the School District by the Director.

Work Program a five-year Facility Work Plan that is financially feasible, as defined by state statute, and which is adopted by the School District and the County and incorporated into the Capital Improvement Element of the County's Comprehensive Plan. The Facility Work Plan itemizes Planned Public School Facilities and includes the following:

- 1) All Planned Public School Facilities, including new construction, expansions, and renovations that will create additional capacity, whether provided by the School District or through Proportionate Share Mitigation;
- 2) Existing and projected enrollment of Public School Facilities;
- 3) The year in which each Planned Public School Facility will be undertaken;
- 4) The source of funding for each Planned Public School Facility and the year in which the funding becomes available;
- 5) The capacity created by each Planned Public School Facility; and
- 6) Necessary data and analysis supporting the proposed Work Program.

Appendix

Table 1: Level of Service by School Type SY 2016/17 Through 2020/21

School Code	SCHOOL NAME	Total FISH Capacity	Core (Cafeteria + multipurpose area)	SY 16/17		SY 17/18		SY 18/19		SY 19/20		SY 20/21	
				Actual Enrollment 8/23/16	Utilization	COFTE Enroll.	Utilization	COFTE Enroll.	Utilization	COFTE Enroll.	Utilization	COFTE Enroll.	Utilization
Elementary School 2016-2021													
AES	Argyle Elementary	789	1352	737	93%	734	93%	726	92%	720	91%	720	91%
CEB	Charles E. Bennett Elementary	870	804	792	99%	789	98%	795	99%	803	100%	818	102%
CGE	Coppergate Elementary	747	1320	490	66%	488	65%	483	65%	478	64%	478	64%
CHE	Clay Hill Elementary	474	770	442	93%	440	93%	435	92%	432	91%	432	91%
DIS	Doctor's Inlet Elementary	732	735	673	92%	670	92%	663	91%	657	90%	657	90%
FIE	Fleming Island Elementary	912	1485	787	86%	784	86%	775	85%	768	84%	769	84%
GPE	Grove Park Elementary	512	925	473	92%	471	92%	466	91%	462	90%	462	90%
KHE	Keystone Heights Elementary	896	823	819	100%	816	99%	807	98%	800	97%	800	97%
LAE	Lake Asbury Elementary	970	1084	819	84%	837	86%	854	88%	861	89%	876	90%
LES	Lakeside Elementary	876	888	813	93%	810	92%	801	91%	794	91%	794	91%
MRE	McRae Elementary	550	1485	496	90%	494	90%	489	89%	484	88%	484	88%
MBE	Middleburg Elementary	650	1279	568	87%	566	87%	560	86%	555	85%	555	85%
MCE	Montclair Elementary	631	781	544	86%	542	86%	536	85%	531	84%	531	84%
OPE	Orange Park Elementary	504	565	484	96%	482	96%	477	95%	473	94%	473	94%
OVE	Oakleaf Village Elementary	1043	1362	913	88%	924	89%	929	89%	936	90%	951	91%
PES	R.M. Paterson Elementary	1018	1336	937	92%	972	95%	992	97%	983	97%	983	97%
POE	Plantation Oaks Elementary	1433	1362	1297	95%	1373	101%	1405	103%	1419	104%	1447	106%
ROE	RideOut Elementary	643	1320	489	76%	509	79%	519	81%	529	82%	544	85%
RVE	Ridgeview Elementary	565	776	521	92%	519	92%	513	91%	509	90%	509	90%
SBJ	S. Bryan Jennings Elementary	712	1086	479	67%	477	67%	472	66%	468	66%	468	66%
SLE	Shadowlawn Elementary	863	1362	693	80%	692	80%	687	80%	683	79%	685	79%
SPC	Swimming Pen Creek Elementary	530	1352	393	74%	391	74%	387	73%	384	72%	384	72%
TBE	Thunderbolt Elementary	1128	1353	969	86%	970	86%	963	85%	954	85%	954	85%
TES	Tynes Elementary	1004	1366	934	93%	971	97%	961	96%	952	95%	952	95%
WEC	W.E. Cherry Elementary	845	855	663	78%	660	78%	653	77%	647	77%	647	77%
WES	Wilkinson Elementary	810	1372	750	93%	747	92%	739	91%	732	90%	732	90%
R	Elementary "R"	0	0										
Y	Elementary "Y"	0	0										
	Total:	20707	29198	17975	87%	18125	88%	18087	87%	18014	87%	18104	87%

Table 1: continued

Junior High School 2016-21													
GCJ	Green Cove Springs Junior High	922	1750	803	87%	824	89%	859	93%	877	95%	866	94%
LAJ	Lake Asbury Junior High	1449	1747	1163	80%	1177	81%	1219	84%	1247	86%	1235	85%
LJH	Lakeside Junior High	1206	1263	827	69%	831	69%	852	71%	866	72%	851	71%
OLJ	Oakleaf Junior High (6-8)	1751	1568	1499	96%	1530	98%	1571	100%	1597	102%	1590	101%
OPJ	Orange Park Junior High	1062	1262	690	65%	693	65%	711	67%	723	68%	710	67%
WJH	Wilkinson Junior High	781	1108	713	91%	728	93%	747	96%	759	97%	746	96%
PP	Junior High "PP"												
Total:		7171	8698	5695	79%	5783	81%	5959	83%	6069	85%	5998	84%
High School 2016-21													
CHS	Clay High	1958	2179	1429	73%	1501	77%	1519	78%	1576	80%	1665	85%
FIH	Fleming Island High	2375	2485	2239	94%	2303	97%	2332	98%	2348	99%	2406	101%
MHS	Middleburg High	2407	1637	1748	107%	1800	110%	1822	111%	1834	112%	1881	115%
OPH	Orange Park High	2343	2818	1575	67%	1614	69%	1635	70%	1644	70%	1685	72%
RHS	Ridgeview High	2254	2299	1624	72%	1669	74%	1689	75%	1700	75%	1742	77%
OLH	Oakleaf High	2459	2845	2400	98%	2528	103%	2560	104%	2609	106%	2720	111%
Total:		13796	14263	11015	80%	11415	83%	11557	84%	11711	85%	12099	88%
Combination / Other 2016-21													
BLC	Bannerman Learning Center	568	332	164	49%	168	50%	170	51%	171	52%	175	53%
KHHS	Keystone Heights High (7-12)	1399	2247	1232	88%	1255	90%	1276	91%	1287	92%	1302	93%
Total:		1967	2579	1396	71%	1423	72%	1446	74%	1459	74%	1477	75%
Grand Total:		43641	54738	36081	83%	36746	84%	37049	85%	37253	85%	37679	86%
GRAPH KEY													
		LOS Exceeds 100%											
		LOS Exceeds 110%											
		Indicates New Capacity											

Table 2: Level of Service by School Type SY 2021/22 Through 2025/26

School Code	SCHOOL NAME	Total FISH Capacity	Core (Cafeteria + Multipurpose area)	SY 21/22		SY 22/23		SY 23/24		SY 24/25		SY 25/26	
				COFTE Enroll.	Utilization	COFTE Enroll.	Utilization	COFTE enroll.	Utilization	COFTE Enroll.	Utilization	COFTE Enroll.	Utilization
Elementary School 2021-2026													
AES	Argyle Elementary	789	1352	726	92%	737	93%	749	95%	757	96%	769	97%
CEB	Charles E. Bennett Elementary	870	804	826	103%	837	104%	851	106%	861	107%	874	109%
CGE	Coppergate Elementary	747	1320	483	65%	490	66%	498	67%	503	67%	511	68%
CHE	Clay Hill Elementary	474	770	436	92%	442	93%	449	95%	454	96%	461	97%
DIS	Doctor's Inlet Elementary	732	735	663	91%	673	92%	684	93%	691	94%	702	96%
FIE	Fleming Island Elementary	912	1485	776	85%	786	86%	800	88%	808	89%	821	90%
GPE	Grove Park Elementary	512	925	466	91%	473	92%	481	94%	486	95%	494	96%
KHE	Keystone Heights Elementary	896	823	807	98%	818	99%	832	101%	841	102%	855	104%
LAE	Lake Asbury Elementary	970	1084	884	91%	897	92%	912	94%	922	95%	936	97%
LES	Lakeside Elementary	876	888	801	91%	812	93%	826	94%	835	95%	848	97%
MRE	McRae Elementary	550	1485	489	89%	496	90%	504	92%	509	93%	518	94%
MBE	Middleburg Elementary	650	1290	560	86%	568	87%	577	89%	583	90%	593	91%
MCE	Montclair Elementary	631	781	536	85%	544	86%	553	88%	559	89%	568	90%
OPE	Orange Park Elementary	504	565	477	95%	484	96%	492	98%	497	99%	505	100%
OVE	Oakleaf Village Elementary	1043	1362	960	92%	973	93%	990	95%	1000	96%	1016	97%
PES	R.M. Paterson Elementary	1018	1336	992	97%	1006	99%	1023	100%	1034	102%	1050	103%
POE	Plantation Oaks Elementary	1433	1362	1460	107%	1480	109%	1505	111%	1522	112%	1546	113%
ROE	RideOut Elementary	643	1320	549	85%	557	87%	566	88%	572	89%	581	90%
RVE	Ridgeview Elementary	565	776	513	91%	521	92%	529	94%	535	95%	544	96%
SBJ	S. Bryan Jennings Elementary	712	1086	472	66%	479	67%	487	68%	492	69%	500	70%
SLE	Shadowlawn Elementary	863	1362	691	80%	701	81%	712	83%	720	83%	732	85%
SPC	Swimming Pen Creek Elementary	530	1352	387	73%	393	74%	399	75%	404	76%	410	77%
TBE	Thunderbolt Elementary	1128	1353	963	85%	976	87%	993	88%	1004	89%	1020	90%
TES	Tynes Elementary	1004	1366	961	96%	975	97%	991	99%	1002	100%	1018	101%
WEC	W.E. Cherry Elementary	845	855	653	77%	663	78%	674	80%	681	81%	692	82%
WES	Wilkinson Elementary	810	1372	739	91%	750	93%	762	94%	770	95%	783	97%
R	Elementary "R"	0											
Y	Elementary "Y"	0											
	Total:	20707	29209	18272	88%	18527	89%	18837	91%	19044	92%	19346	93%

Table 2: continued

Junior High School 2021-2026													
GCJH	Green Cove Springs Junior High	922	1750	854	93%	848	92%	844	92%	830	90%	814	88%
LAJH	Lake Asbury Junior High	1449	1747	1218	84%	1210	83%	1204	83%	1184	82%	1161	80%
LJH	Lakeside Junior High	1206	1263	840	70%	834	69%	829	69%	816	68%	800	66%
OLJH	Oakleaf Junior High (6-8)	1751	1568	1578	101%	1576	101%	1578	101%	1565	100%	1551	99%
OPJH	Orange Park Junior High	1062	1262	701	66%	696	66%	692	65%	681	64%	668	63%
WJH	Wilkinson Junior High	781	1108	736	94%	731	94%	727	93%	715	92%	701	90%
PP	Junior High "PP"		0										
Total:		7171	8698	5927	83%	5894	82%	5874	82%	5789	81%	5695	79%
High School 2021-2026													
CHS	Clay High	1958	2179	1686	86%	1692	86%	1691	86%	1651	84%	1620	83%
FIHS	Fleming Island High	2375	2485	2435	103%	2445	103%	2442	103%	2385	100%	2340	99%
MHS	Middleburg High	2407	1637	1905	116%	1912	117%	1910	117%	1865	114%	1830	112%
OPH	Orange Park High	2343	2818	1706	73%	1712	73%	1711	73%	1671	71%	1639	70%
RHS	Ridgeview High	2254	2299	1763	78%	1770	79%	1768	78%	1727	77%	1694	75%
OLHS	Oakleaf High School	2459	2845	2754	112%	2764	112%	2761	112%	2697	110%	2646	108%
Total:		13796	14263	12248	89%	12295	89%	12283	89%	11996	87%	11770	85%
Combination / Other 2021-2026													
BLC	Bannerman Learning Center	568	332	175	53%	176	53%	177	53%	176	53%	169	51%
KHHS	Keystone Heights High (7-12)	1399	2130	1302	93%	1308	94%	1309	94%	1306	93%	1254	90%
Total:		1967	2462	1477	75%	1484	75%	1485	76%	1482	75%	1423	72%
Student Total:		43641	54632	37924	87%	38200	88%	38479	88%	38311	88%	38234	88%
GRAPH KEY													
		LOS Exceeds 100%											
		LOS Exceeds 110%											
		Indicates New Capacity											

Figure 1

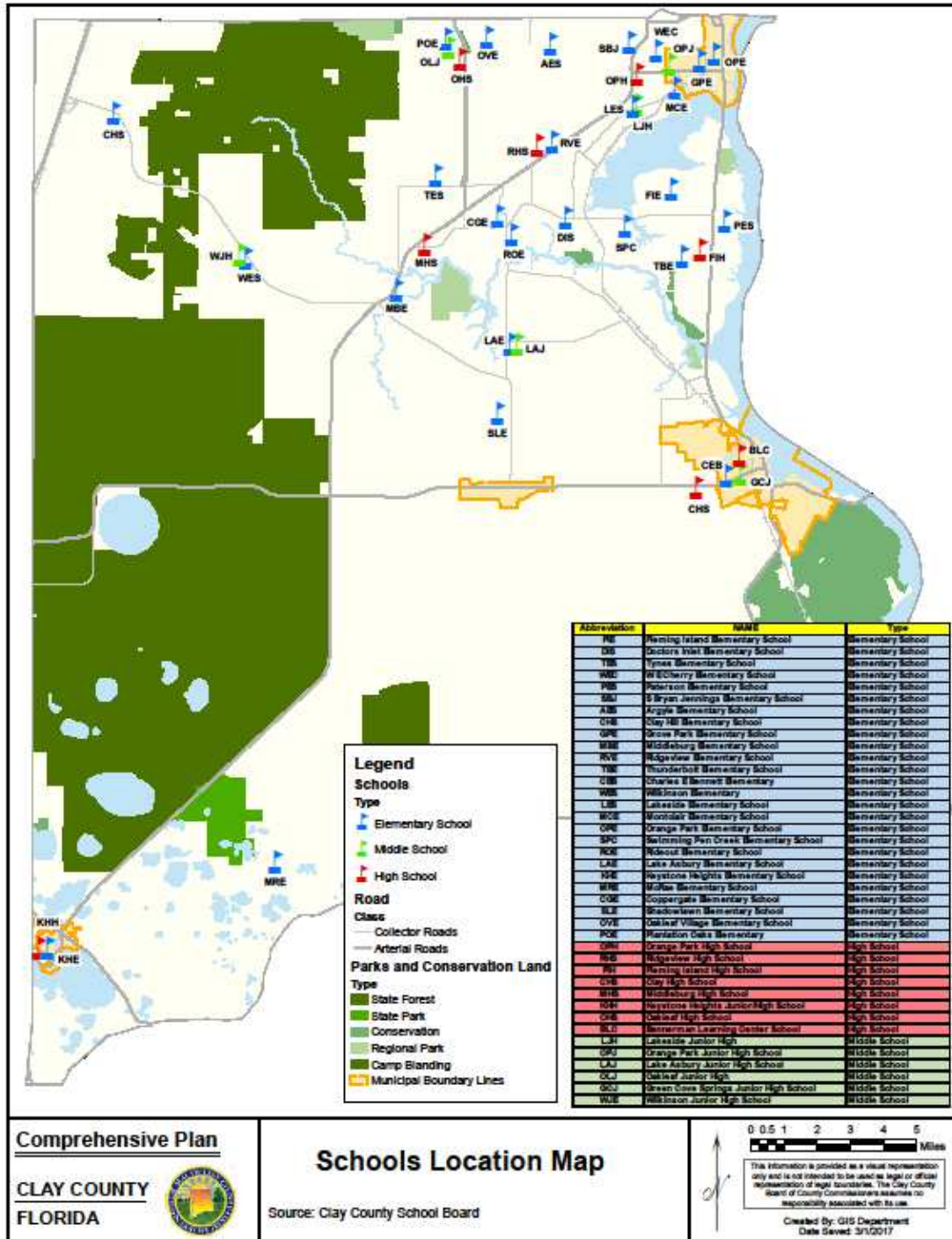
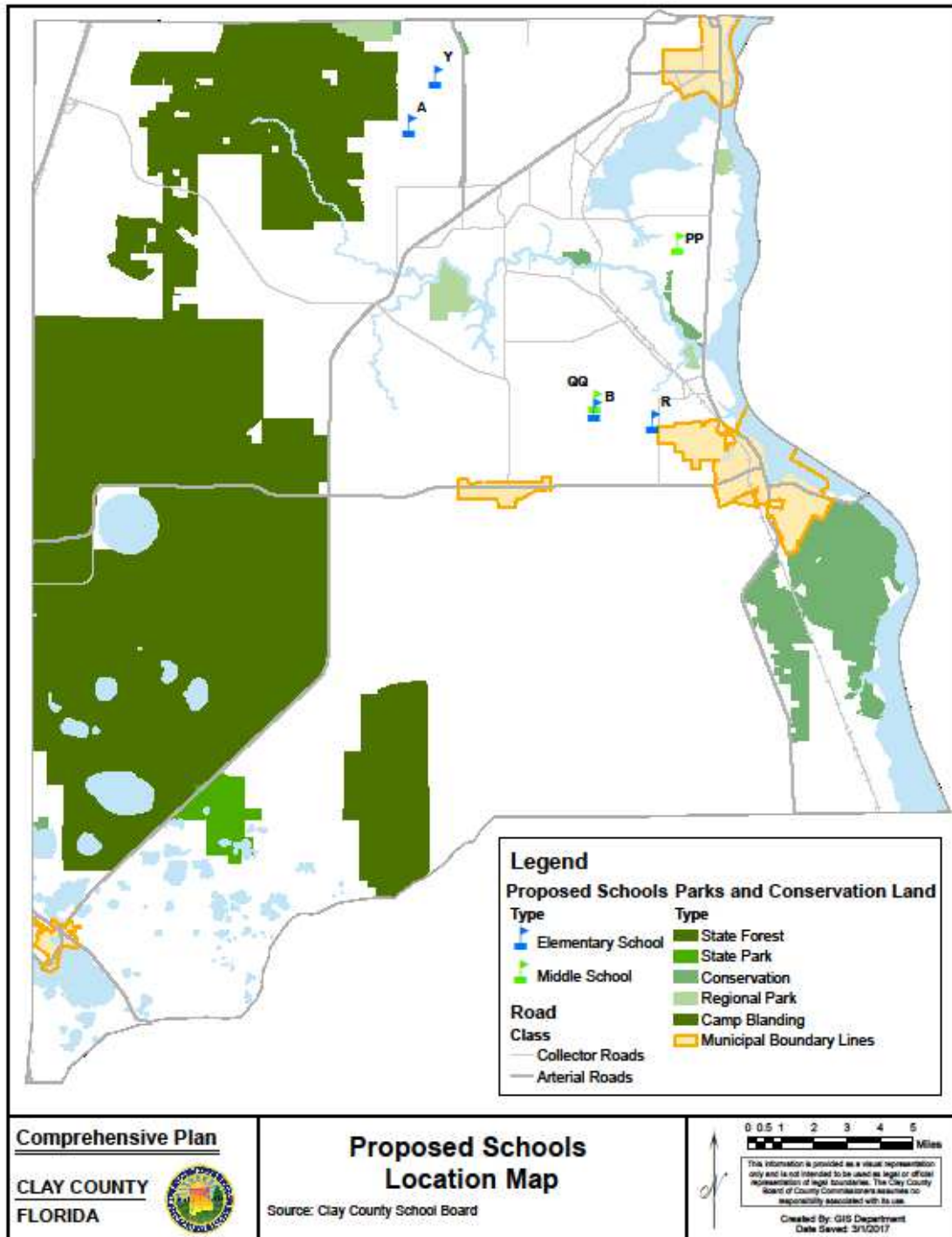
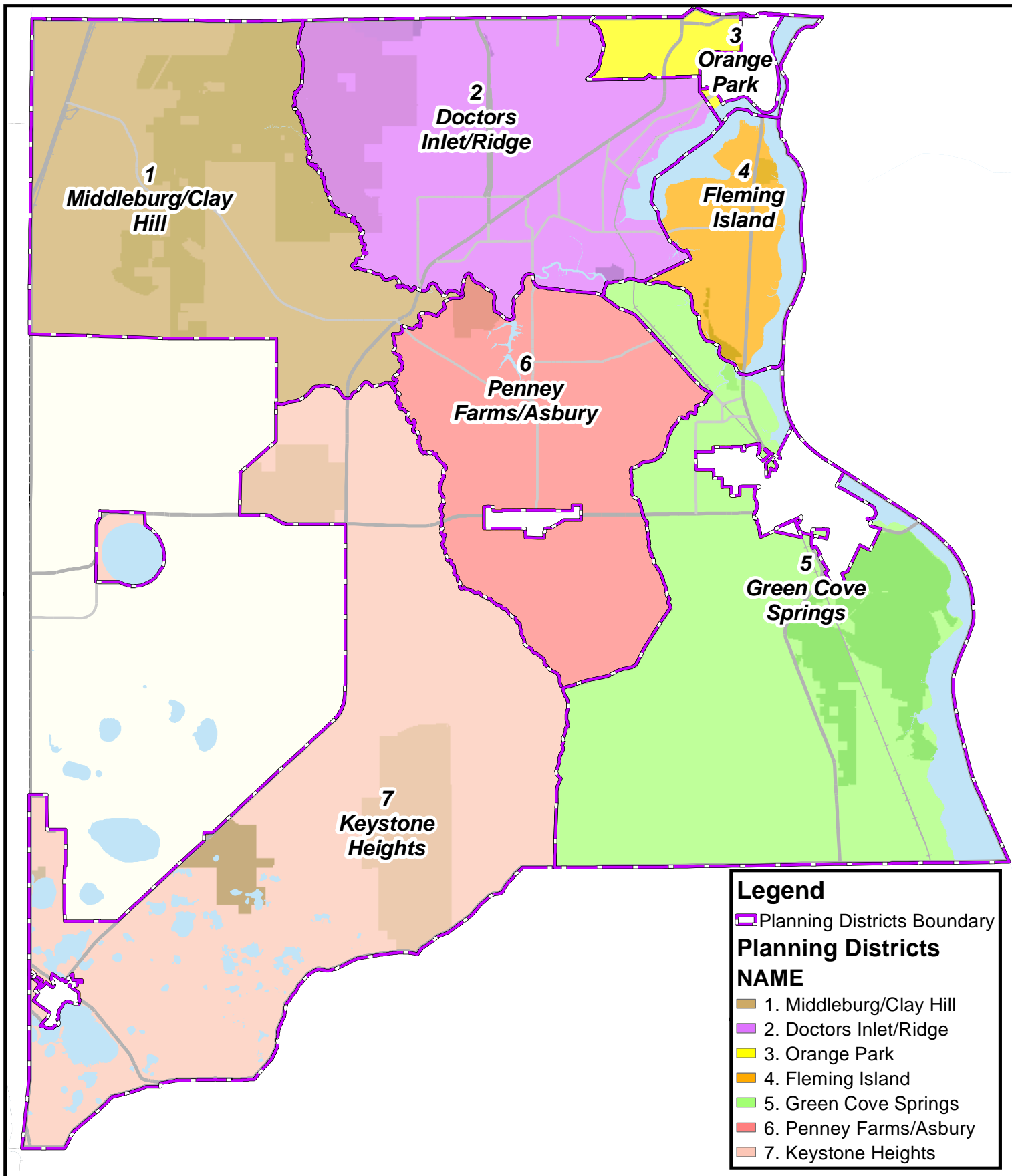


Figure 2





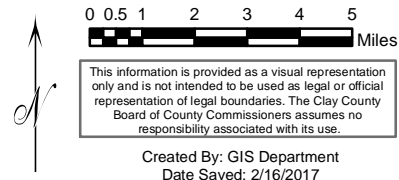
Comprehensive Plan

**CLAY COUNTY
FLORIDA**



Planning Districts

Source: Clay County Planning and Zoning (2017)





Clay County

2017 Evaluation and Appraisal Report

Data and Analysis &
Draft Policy Recommendations

August 1, 2017

Exhibit B:

Housing Element

Establish measurable targets for 2040

- Objective 1.1 Additional DU to meet the projected rise in population by 2040
Consistent with County-derived projections
- Objective 1.2 50% reduction of substandard housing
Units lacking complete kitchen and/or plumbing facilities

Exhibit B: Housing Element

In addition to other density bonuses, increase bonus for workforce, senior & disabled housing

	<u>Existing Bonus</u>	<u>Proposed Bonus</u>
Rural Fringe	-	7 DUA
Urban Fringe	-	14 DUA
Urban Core (10)	16 DUA	16 DUA
Urban Core (16) NEW	-	20 DUA

- Policies 1.3.5 and 1.3.6

Exhibit D:

Conservation Element

Establish a policy to be consistent with current state statute

- Policy 1.3.7 Analyze current and projected sustainable water sources for at least a 10-year period
Consistent with the SJRWMD Water Supply Plan and supports protection of quality water sources

Establish measurable targets for components of the Element

- Policy 1.1.1 Adopt a Greenways and Trails Master Plan by 2019
Existing policy that was never realized (REC and CON elements)
- Policy 1.2.2 Development of a Master Stormwater Management Plan in phases. Completion by December 31, 2025
Existing policy that was never fully realized
- Policy 1.10.1 Set criteria for LEED standards in development and redevelopment projects by 2019
Provides for energy efficient projects that create value in community

Exhibit E:

Intergovernmental Coordination Element

Revise policy to reflect support for other transportation plans

- Policy 1.2.4 Policy revised to show support of plans for port, aviation, and related facilities that are consistent with the transportation element
Existing policy requires the County to “prepare and maintain” these plans

Revise policy to include the City of Starke

- Policy 1.3.6 Policy addresses the County’s mutual aid agreements for fire protection with its municipalities and the City of Starke



Exhibit H: Historic Preservation Element

The name of the Element is proposed to be amended to “Historic Preservation Element”

Consistent with name and duties of the Historic Preservation Board

Exhibit I:

Recreation – Open Space Element

Establish measurable targets for components of the Element

- Policy 1.1.9 Update/ Amend Parks and Recreation Master Plan every five (5) years
Consistent with Florida Statutes for statewide recreation planning
- Policy 1.2.7 Adopt a Greenways and Trails Master Plan by 2019
Existing policy that was never realized (REC and CON elements)

Enhance the siting criteria for recreation facilities

- Policy 1.1.4 Concentrate on large population centers for each planning district
Creates a focused approach to siting recreation facilities where they are needed most



Exhibit J: Economic Development Element

Policy related to the First Coast Expressway

- FCE strategically incorporated into the County's Future Land Use framework to maximize infrastructure and transportation investment and to support economic development efforts.

Policy 1.2.5

Consistent with the community input

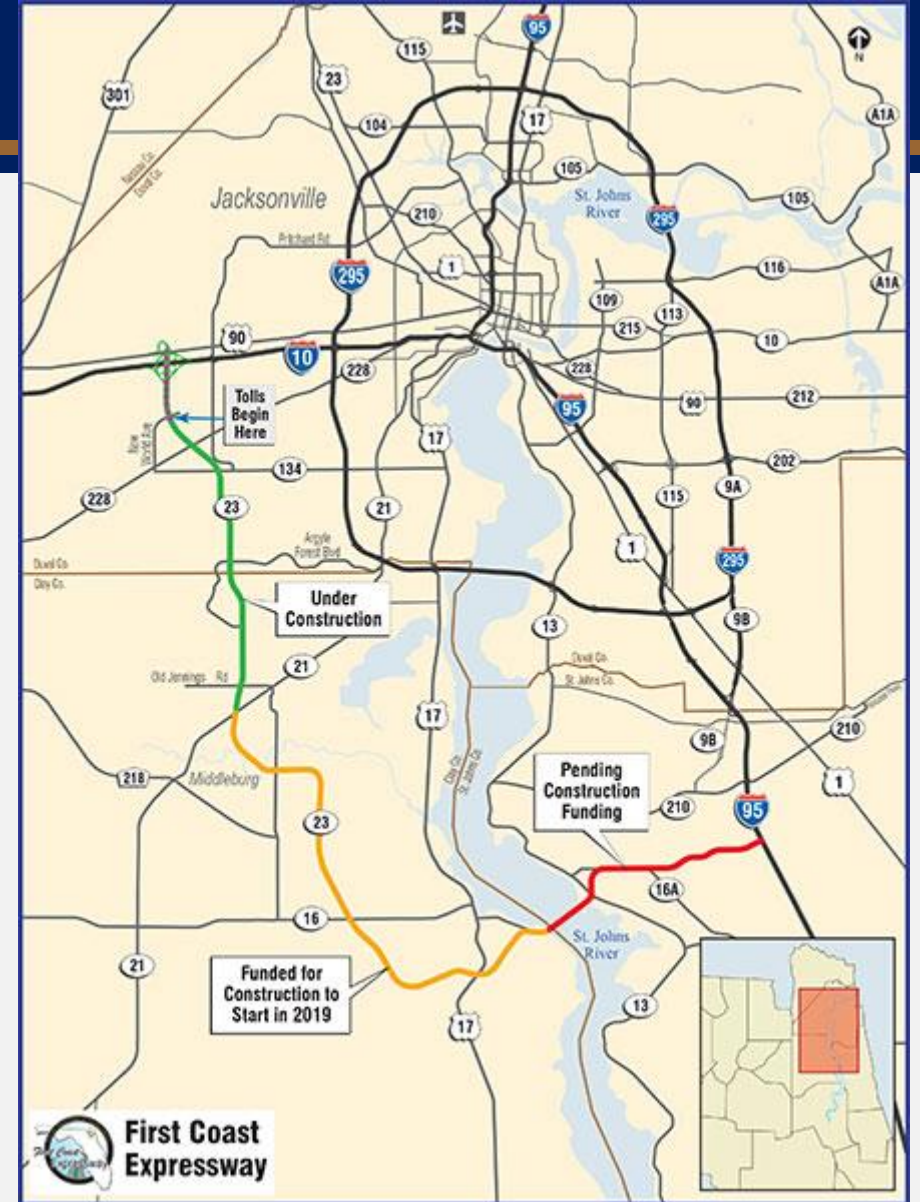


Exhibit J:

Economic Development Element

Policies to support Workforce Development, Training & Retention

- New GOPs that support this strategy
 - Goal 2: Objective 2.1 & 2.2 and associated policies
Consistent with the community input/data and analysis
- Workforce Development, Training & Retention policies (Obj. 2.1)
 - Reduce worker outflow to surrounding counties
 - Education and training → clustering and co-location → classroom to job
- Innovation and Entrepreneur policies (Obj. 2.2)
 - Encourage urban placemaking that includes housing options, multi-modal transportation, infill and adaptive reuse, co-work/incubator space which attracts a young and diverse entrepreneurial workforce

Exhibit K:

Public School Facilities Element

Establish measurable targets for components of the Element

- Policy 1.1.4 Update the Long Term Concurrency Management System and include in the CIE “Summary of Capital Improvements Program” no later than December 1st of each year
Establishes a target date consistent with other policies
- Policy 1.2.3 Adopt revisions to School Concurrency Service Areas (SCSAs) no later than December 1st of each year
Establishes a target date consistent with other policies

Schedule

Date	Meetings or Agency	Activity
July 11, 2017	Joint PC/ BCC Meeting	Present all proposed changes
August 1, 2017	Planning Commission	Present the Conservation, Economic, Historical, Housing, Intergovernmental Coordination , Recreation and Open Space and Public Schools Elements
August 8, 2017	BCC	Present the Conservation, Economic, Historical, Housing, Intergovernmental Coordination , Recreation and Open Space and Public Schools Elements
September 5, 2017	Planning Commission	Present the Future Land Use, Community Facilities, Capital Improvements, Transportation, Branan Field and Lake Asbury Elements
September 12, 2017	BCC	Present the Future Land Use, Community Facilities, Capital Improvements, Transportation, Branan Field and Lake Asbury Elements
September 26, 2017	BCC	Present Full Transmittal Package for vote
September 29, 2017	DEO	Transmittal of document to DEO
May 1, 2018	Planning Commission	Presentation of amendments for recommendation
May 8, 2018	BCC	First Public Hearing for amendments
May 22, 2018	BCC	Adoption Hearing for amendments
June 4, 2018	DEO	Transmit Adopted Amendments to DEO



Agenda Item
PLANNING COMMISSION

Clay County Administration Building
Tuesday, August 1 6:00 PM

TO: Planning Commission

DATE: 6/28/2017

FROM: Holly R. Coyle

SUBJECT: Staff is proposing several revisions to the Floodplain Management Ordinance to provide clarification and additional requirements for development within a floodplain.

AGENDA ITEM TYPE:

BACKGROUND INFORMATION:

See attached memo.

ATTACHMENTS:

Description	Type	Upload Date	File Name
▣ Cover Memo	Cover Memo	6/28/2017	PC_Cover_Memo_2017_Revisions.pdf
▣ Ordinance	Cover Memo	6/28/2017	Ordinance_2017-.pdf



**Department of Economic
and Development Services**

Memorandum

To: Planning Commission
From: Holly R. Coyle, Director
Date: June 28, 2017
Re: Public Hearing to Consider Revisions to Article XIII, Floodplain Management Regulations

Background: Since July 2, 1981, Clay County has participated in the National Flood Insurance Program. To qualify, the County adopted a Flood Ordinance which regulated development in the Special Flood Hazard Areas as delineated in floodplain mapping provided by FEMA. New Flood Insurance Rates Maps were issued in 2014 and the ordinance was updated at that time, consistent with the model flood ordinance produced by the State of Florida. Staff is proposing several revisions to the ordinance to provide clarification and additional requirements for development within a floodplain. The attached ordinance proposes to:

- 1) Add compensating storage requirements for filling in the floodplain and in flood-prone areas to assure that no blockage occurs in the floodplain.
- 2) Clarify the requirements of a no-rise certification analysis.
- 3) Provide regulations regarding commercial and industrial development within a designated flood zone.
- 4) Provide regulations for the placement of manufactured/mobile homes in a regulatory floodway.

Recommendation: Adoption of the ordinance.

ORDINANCE 2017-

AN ORDINANCE OF THE BOARD OF COUNTY COMMISSIONERS OF CLAY COUNTY, FLORIDA, AMENDING CERTAIN PROVISIONS OF ARTICLE XIII OF THE CLAY COUNTY LAND DEVELOPMENT CODE, BEING THE CODIFICATION OF ORDINANCE 2014-3, AS AMENDED, AND COMPRISING THE FLOODPLAIN MANAGEMENT REGULATIONS TO REVISE SECTION 13-4(3) TO ADD REQUIREMENTS FOR COMPENSATING STORAGE REQUIREMENTS FOR FILLING IN THE FLOODPLAIN AND IN FLOOD-PRONE AREAS; TO REVISE SECTION 13-5(3)(a) TO CLARIFY REQUIREMENTS OF NO-RISE CERTIFICATION ANALYSIS; TO REVISE SECTION 13-12(6) TO PROVIDE REGULATIONS REGARDING COMMERCIAL AND INDUSTRIAL DEVELOPMENT WITHIN A DESIGNATED FLOOD ZONE; TO REVISE SECTION 13-13(1) TO PROVIDE REGULATIONS FOR THE PLACEMENT OF MANUFACTURED/MOBILE HOMES IN A REGULATORY FLOODWAY; PROVIDING FOR SEVERABILITY; AND PROVIDING AN EFFECTIVE DATE.

Be It Ordained by the Board of County Commissioners of Clay County:

Section 1. As used in Sections 2 through 5 of this ordinance, the term “Article XIII” shall mean and refer to Article XIII of the Clay County Land Development Code, being the codification of Ordinance No. 2014-3 and, as subsequently amended, comprising the General Provisions of said Code.

Section 2. Section 13-4, paragraph (3), Article XIII is hereby amended to read in its entirety as follows:

- (3) **Application for a permit or approval.** To obtain a floodplain development permit the applicant shall first file an application in writing on a form furnished by the County. The information provided shall include but not be limited to the following:
- (a) Identify and describe the development to be covered by the application.
 - (b) Describe the land on which the proposed development is to be conducted by legal description, street address or similar description that will readily identify and definitively locate the site.
 - (c) Indicate the use and for which the proposed development is intended.
 - (d) Be accompanied by a site plan or construction documents as specified in Section 105 of this article.
 - (e) State the valuation of the proposed work.

- (f) Be signed and notarized by the applicant or the applicant's authorized agent.
- (g) Give such other data and information as required by the Floodplain Administrator.

(h) Any site within a floodplain (including residential lots) located adjacent to a stream or river or within an area known for repetitive flooding must be evaluated to assure that no blockage occurs in the floodplain.

In the event a 100-year flood zone, as shown on current FIRM maps or delineated by the best available date, is to be filled:

1. adequate storage area must be provided to hold the same quantity of water that the flood area held prior to filling;
2. certain channel improvements downstream must be made to compensate for any storage denial; or
3. a combination of 1 and 2 above unless otherwise approved by the County Engineer.

(i) In filling in flood-prone areas, adequate drainage must be provided to accommodate stormwater. This could be in the form of alternate water storage areas, improvements, or a combination of these or other basin changes.

Section 3. Section 13-5, paragraph (3), subparagraph (a), of Article XIII is hereby amended to read in its entirety as follows:

- (a) For development activities proposed to be located in a regulatory floodway, a floodway encroachment analysis that demonstrates that the encroachment of the proposed development will not cause any increase in base flood elevations, regulatory floodway elevations, or regulatory floodway widths. The floodway encroachment analysis must include an encroachment certification (No-Rise Certification) signed and sealed by a registered professional engineer. The certification must be supported by technical data, which should be based on the same computer model used to develop the floodway shown on the Clay County Flood Insurance Rate Maps.

Where the applicant proposes to undertake development activities that do increase base flood elevations, the applicant shall submit such analysis to FEMA as specified in Section 13-5(4) of this article and shall submit the Conditional Letter of Map Revision, if issued by FEMA, with the site plan and construction documents. Where the Floodplain Administrator has determined that the development activity proposed within a floodway qualifies as a Minor Project or is entirely located within a floodway Conveyance Shadow, the submittal of an analysis shall not be required.

Section 4. Section 13-12, paragraph (6), of Article XIII is hereby added to read in its entirety as follows:

(6) Limitations on commercial and industrial uses. Commercial and industrial uses located within a designated flood zone must be served by central water and sewer.

Section 5. Section 13-13, paragraph (1), of Article XIII is hereby amended to read in its entirety as follows:

Sec. 13-13. MANUFACTURED HOMES

(1) General. The placement of manufactured/mobile homes, except in an existing manufactured/mobile home park or subdivision is prohibited in the floodway. A replacement manufactured home may be placed on a lot in an existing manufactured/mobile home park or subdivision provided the anchoring standards of Section 3-13(3), and the elevation standards of Section 13-5(2)(c)2 and Section 13-10(4)(a) are met.

All manufactured homes installed in flood hazard areas shall be installed by an installer that is licensed pursuant to section 320.8249, F.S., and shall comply with the requirements of Chapter 15C-1, F.A.C. and the requirements of this article.

Section 6. If any section, phrase, sentence or portion of the ordinance is for any reason held invalid or unconstitutional by any court of competent jurisdiction, such portion shall be deemed a separate, distinct, independent and severable provision, and such holding shall not affect the validity of the remaining portions thereof.

Section 7. This ordinance shall become effective as prescribed by Florida general law.

DULY ADOPTED by the Board of County Commissioners of Clay County, Florida, this ____ day of August, 2017.

BOARD OF COUNTY COMMISSIONERS
CLAY COUNTY, FLORIDA

By: _____
Wayne Bolla
Its Chairman

ATTEST:

S. C. Kopelousos
County Manager and Clerk of the
Board of County Commissioners



Agenda Item
PLANNING COMMISSION

Clay County Administration Building
Tuesday, August 1 6:00 PM

TO: Planning Commission

DATE: 7/23/2017

FROM: Edward Lehman

SUBJECT: The proposed ordinance amends the Land Development Code to no longer require 750 square feet minimum living area for dwelling units in Agriculture and Agriculture/Residential zoning.

AGENDA ITEM TYPE:

BACKGROUND INFORMATION:

Staff has had several inquiries from the public about the possibility of building "tiny houses" in the County. The Land Development Code requires a minimum living area of 750 square feet in all zoning districts except PUD. Staff recommends that the LDC be amended to allow such dwelling units in AG and AR zoning districts.

ATTACHMENTS:

Description	Type	Upload Date	File Name
▣ Staff Memo	Cover Memo	7/24/2017	Tiny_homes_-_PC_memo.pdf
▣ Proposed Ordinance	Ordinance	7/24/2017	Tiny_Homes_Ordinance_1d.pdf



**Department of Economic
and Development Services**

Memorandum

To: Planning Commission
From: Edward Lehman, Planning and Zoning Director
Date: August 1, 2017
Re: Tiny Homes

Issue: Allow for dwelling units smaller than 750 square feet living area in the Agriculture (AG) Zoning District and the Agriculture/Residential (AR) Zoning District.

Background: There have been several inquiries about the ability for residents in Clay County to construct houses smaller than presently allowed in our Land Development Code, which reflects the increasing popularity of “tiny houses” around the country. There is presently no set definition of a tiny home, but it is generally noted on a number of websites that a tiny home is a living quarters of 500 feet or less. The Clay County Land Development Code does not allow tiny homes in any zoning district that allows residential dwelling units. The exception is that minimum living area requirements are not mandated in PUDs. Section 3-7(f)3 of the Land Development Code currently reads as follows:

- (3) Minimum Living Area: No living unit shall be constructed with a living area of less than 750 square feet, excluding units within the Planned Unit Development District. The Section shall not apply to mobile residences or house trailers meeting all other requirements of this Article. Minimum living area shall include only conditioned space.

Therefore at this time, tiny homes could be constructed in Clay County, but only as part of a PUD zoning district. Staff is not aware of any PUD that has approved houses with a minimum living area of less than 750 square feet. While presently there seems to be nothing preventing a land owner from proposing a PUD that includes dwelling units smaller than 750 square feet, staff believes that land use densities may restrict anyone from doing a community of tiny houses. Staff will continue to research whether there are additional changes to the Land Development Code and Comprehensive Plan that are necessary to facilitate such a development.

Proposed Language: Staff believes that at the present time the ability to construct a tiny house should be limited to parcels with Agriculture (AG) and Agriculture/Residential (AR) zoning. Staff is concerned that there could be incompatibility issues with allowing these smaller units in residential zoning. As such staff is proposing that the Planning Commission consider adoption of the changes

shown in the attached ordinance that remove reference to 750 square feet of minimum living area in AG and AR zoning districts.

Recommendation: Staff recommends that the Planning Commission approve the language in the attached ordinance that removes the requirement that dwelling units in AG and AR zoning have a minimum living area of 750 square feet.

ORDINANCE NO. 2017 - ____

AN ORDINANCE OF THE BOARD OF COUNTY COMMISSIONERS OF CLAY COUNTY, FLORIDA, AMENDING SEC. 3-7 OF ARTICLE III OF THE CLAY COUNTY LAND DEVELOPMENT CODE, BEING THE CODIFICATION OF ORDINANCE NO. 93-16, AND COMPRISING THE ZONING AND LAND USE LAND DEVELOPMENT REGULATIONS, AS SAID ARTICLE III HAS BEEN SUBSEQUENTLY AMENDED BY ORDINANCE, BY AMENDING PARAGRAPH 3-7(f)(3) TO ADD AGRICULTURAL ZONING DISTRICT AND AGRICULTURAL/RESIDENTIAL ZONING DISTRICT AS EXCEPTIONS TO THE 750 SQUARE FEET MINIMUM LIVING AREA REQUIREMENT AND TO REQUIRE THAT ALL DWELLING UNITS MEET THE REQUIREMENTS OF THE FLORIDA BUILDING CODE; BY DELETING PARAGRAPH 3-12(f)(8) TO REMOVE THE REQUIREMENT FOR A MINIMUM OF 750 SQUARE FEET OF LIVING AREA IN THE AGRICULTURAL DISTRICT (ZONE AG); BY DELETING PARAGRAPH 3-13(f)(8) TO REMOVE THE REQUIREMENT FOR A MINIMUM OF 750 SQUARE FEET OF LIVING AREA IN THE AGRICULTURAL/RESIDENTIAL DISTRICT (ZONE AR); PROVIDING FOR SEVERABILITY; AND PROVIDING AN EFFECTIVE DATE.

Be It Ordained by the Board of County Commissioners of Clay County:

Section 1. As used in Sections 2 through 4, the term “Article III” shall mean and refer to Article III of the Clay County Land Development Code, being the codification of Ordinance 93-16 and comprising the Zoning and Land Use Land Development Regulations, as said Article III has been subsequently amended by ordinance.

Section 2. Paragraph (3) of Subsection 3-7(f) of Article III, is hereby amended as follows:

(3) *Minimum Living Area.* No living unit shall be constructed with a living area of less than 750 square feet, excluding units within the Agricultural Zoning District, the Agricultural/Residential Zoning District and the Planned Unit Development District. This Section shall not apply to mobile residences or house trailers meeting all other requirements of this Article. Minimum living area shall include only conditioned space. All dwelling units must meet the requirements of the Florida Building Code.

Section 3. Paragraph (8) of Subsection 3-12(f) of Article III, which subsection (f) sets forth lot and building requirements in the Agriculture District (Zone AG) is hereby deleted as follows:

~~(8) Minimum living area 750 sq. ft.~~

Section 4. Paragraph (8) of Subsection 3-13(f) of Article III, which subsection (f) sets forth lot and building requirements in the Agriculture/Residential District (Zone AR) is hereby deleted as follows:

~~(8) Minimum living area 750 sq. ft.~~

Section 5. This ordinance shall take effect as provided by Florida general law.

DULY ADOPTED by the Board of County Commissioners of Clay County, Florida, this ____ day of _____, 2017.

BOARD OF COUNTY COMMISSIONERS
CLAY COUNTY, FLORIDA

By: _____
Wayne Bolla
Its Chairman

ATTEST:

S. C. Kopelousos
County Manager and Clerk of the
Board of County Commissioners