

As indicated previously, the Comp Plan/LDC Working Group is supportive of the efforts to date on Vision Plan 2045. In this document, we are offering additional input on the goals and objectives of Themes 1-3. We will also submit further theme-specific input for the last two themes prior to the February 23 meeting. The following points either add new points, update input previously provided, or stress points we feel are extremely important.

Points relevant to all themes:

- **Interdependence of all themes, goals and objectives:** As we pointed out in our previous comments related to the choice of a “lens” through which to view the elements of our reality, all themes in our Plan and all aspects of our future (environmental, economic and social) are interrelated and interdependent. This applies on the level of goals and objectives as much as it does on the level of a more general “lens.”
- **Framework for/assurance of implementation and enforcement:** The 2011 Comprehensive Plan provided excellent principles for moving forward, but lacked the specifics to ensure implementation and enforcement (much of which would have been in a parallel LDC update). We don’t want to overlook this.
- **Maintenance & monitoring:** Maintenance and monitoring are critical to every program because they can avoid prohibitive future expenses.
- **Appropriateness:** Are we applying the most appropriate solution/strategy considering the nature of our small barrier island and the history and nature of our community?
- **Community education and engagement** are essential for the future of Fernandina Beach. As indicated in the current draft of the Plan, further collaboration between citizens, local nonprofits and the City can help advance this effort.

Theme 1: Environmental Sustainability & Resiliency

- **Prioritization of natural approaches to resiliency:** One consistent and dominant outcome of recent research has been that natural systems provide the most effective protection from sea level rise, storm surge and climate change. While we will have cases that necessitate manmade strategies, we will be better served if we utilize natural approaches wherever possible (e.g., maintaining our marshes and their vegetation, maintaining and enhancing natural shorelines and growing our dunes with native vegetation).
- **Resiliency planning:** Please refer to pp. 4-5 of our “Comments on Vision Plan 2045 Draft,” which is attached, for further explanation. We would like to ensure that plans are developed or updated for the following:
 - **Beach/Dune/Offshore Management Plan:** We have learned that the “Dune Management Plan” cited in the Vision Plan is the Army Corps of Engineers plan approved by the city in 2018. Because this plan is inadequate and dated, it needs

to be updated as soon as possible. Note the key planning goals cited in our “Comments on Vision Plan 2045 Draft” at the bottom of p. 4.

- **Amelia River Shoreline Resiliency Plan**
- **Potential Wetlands Protection Plan**
- **Restrictions on building in the 100- and 500-year floodplain**
- **Wildlife habitat and corridor plan:** We need to study wildlife habitat and corridors for all wildlife on the island, in collaboration with Nassau County.
- **Development of a public education program for residents and visitors**
- **Incorporation & full implementation of standards, enforcement and monitoring needed for timely preparation for and response to sea level rise, storm surge and climate change:**
 - Monitoring for salt water intrusion and development of standards for avoiding it
 - Monitoring ground water (salt, chemicals, elevation, etc.)
 - Clear standards for pre-, mid- & post-construction inspections
 - Water quality in our retention ponds; monitoring & cleaning dry ponds & swales
 - Standards & monitoring of outdoor air quality
- **Establishment of a volunteer Sustainability & Resiliency Commission** (see attached draft): Working together with the Chief Resiliency Officer and regional experts, this would 1) ensure a current focus on global best practices, 2) provide voice for and a forum for discussion of relevant aspects of planning, and 3) contribute to public education, engagement and contribution to these aspects of planning. If this structure proves to be a burden for staff, an alternative would be adaptation of the size and composition of the PAB or a PAB subcommittee.
- **Process for maintaining best practices:** We need a continual process for upgrading our policies, standards and processes to reflect the most advanced and relevant best practices, drawing not only from regional communities but also from around the world.
- **Monitoring for invasive species:** We need to commit resources to preventing the introduction of invasive species, both flora and fauna. There is currently no local monitoring of materials passing through our port and other regional ports.
- **Development of stricter regulations for the use of herbicides, pesticides, fertilizers, and soil amendments:** To the extent possible, our governing documents should protect water and soil quality by avoiding nonpoint source pollution in the City and on our barrier island.
- **Higher standards for indoor ventilation systems:** Our current experience with COVID has demonstrated a need for higher standards in indoor ventilation.
- **Development of land cover maps:** We recommend that the City collaborate with the County to produce land cover maps starting with Amelia Island for the purpose of building foundational spatial data layers for decision-making. This would entail establishing land cover classification standards, to include a classification scheme, minimum ground truth requirements, image libraries, methods, and accuracy assessment.

Theme 2: Preservation of character

- **Role of our natural environment in the character of the City:** We need to understand that manmade features of our built environment are not the only important elements that constitute the character of the City. Our tree canopy, our dune system (now one of the best on the east coast), the Greenway, our marshes & tidal creeks, our migratory birds and other wildlife all contribute substantially to our character. According to Gil Langley, head of our Tourist Development Council (TDC), our environment is the foundation of the tourist industry on Amelia Island. At this point in time, it is our competitive edge. For this reason, TDC advertising and promotions almost exclusively focus on our environment.
- **Control of density & compensatory conserved land:** Because of the documented importance of “small-town charm” in our attractiveness to tourists and potential residents, we need to manage and control growth in density. We also need to ensure that we have sufficient conserved land and open spaces to compensate for any increase in density in the perception of its residents and visitors.
- **Training & credentialed (arborist) supervision of staff engaged in landscape maintenance (Parks & Rec, Maintenance, Urban Forester) in Bosque Bello, city parks and Rights of Way:** We have made this point in our earlier response to the Vision Plan and in other documents, but cannot emphasize this enough. It is critical for our sustainability and resiliency. Further, by failing to ensure appropriate training in the care of our canopy and understory, the City has wasted a tremendous amount of money by killing newly planted trees and our mature trees that provide important services.
- **Beyond the Historic District:** Preservation of character should include all neighborhoods in Fernandina Beach and not just the Historic District. This includes protection of homes on Fletcher and near the beach as well as older homes and heritage oaks in neighborhoods surrounding Peck High School.
- **Celebration of our unique character:** The unique character of Fernandina Beach should be recognized and reflected in its events and various celebrations.

Theme 3: Livability

- **Limiting and managing density:** This is the most critical factor in maintaining livability. Increased density is not compatible with livability on a barrier island.
 - It destroys the economic foundations of the island, the “small town charm” and the natural environment. Loss of these characteristics (critical elements in the sense of place of Fernandina Beach) is synonymous with loss of our competitive edge.
 - It limits and may preclude the possibility of developing sustainability and resilience in the face of the hazards of climate change, storm surge, sea level rise, salt water intrusion, etc.

- It increases crime rates, a fact that has been documented by decades of research across the country.
- It endangers the population by precluding safe evacuation. In our research for the Comprehensive Plan, we learned from Emergency Management Director Greg Foster that population and vehicle numbers are not even considered in developing evacuation plans or policy. We also learned that way too little attention is paid to disasters other than hurricanes. We have multiple mills utilizing dangerous chemicals, a port that may introduce dangerous products or invasives and nuclear subs in and directly across the St. Marys. A disaster in any of these locations would not allow several days for evacuation.
- Increased population does not increase revenue for local municipalities. Providing infrastructure and services for an increasing residential population is a losing proposition, as has been documented in County data in recent years. Those looking for increased revenue through population growth are deluded, as this has been documented in many ways all over the country.

It is critical that we identify every possible strategy for controlling and managing this growth. For example,

- Establishing a formula for specifying the amount of conserved and open land necessary for further development.
 - Utilizing every possible strategy for land conservation.
 - Utilizing serious research data to support the development of evacuation plans and policies.
 - Developing the most restrictive policies feasible in Florida.
- **Limiting and managing noise:** Another threat to livability is noise. We already have an incredible amount of noise downtown from the port and the mills. Now, we are increasing the noise at the airport. We have seen that offensive noise at the airport is offensive from one end of the island to the other. Thus, we need policies that prevent high noise levels in the City (and on the entire island).
 - **Accurately understanding our transportation, traffic and parking reality in the City and the County:** In collaboration with the county, an in-depth, holistic study of transportation, traffic and parking needs to be conducted for the entire county and the City. What we have seen thus far is snapshots of a few pieces of the puzzle. This is a strategy for implementing inappropriate plans that do not fit the context or solve any problems, yet are highly expensive.
 - **Developing a good match between new businesses and the context:** In the past, many in the community have been shocked by the types of businesses sought out by the Nassau County Economic Development Board for the island, with apparently no thought given to the barrier island context, the character of the island or the community. It is critical that there be a good fit between the business and its potential context.
 - We need an updated and more thorough understanding of the current nature of our economy in Fernandina Beach, as described in Goal 9. Economic Development

- in our Comprehensive Plan draft as well as in our March 25 webinar presentation (aiwg.org).
- Based on that research, we will need a variety of types of businesses that support community needs and support the character of the community and our physical context.
 - **Developing strategies to improve workforce housing, affordable housing and homelessness:** We are happy to see a focus on workforce and affordable housing in the Vision Plan. Please note also the related comments in our initial response to the Vision Plan (attached) and in our Comprehensive Plan draft for Goal 5. Housing and the April 1 webinar (aiwg.org).

Those of us on the Comp Plan/LDC Working Group greatly appreciate the opportunity to provide input on the Vision Plan. Please feel free to contact us if there is need for clarification or discussion.

Respectfully submitted,

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