

The Comp Plan/LDC Working Group has followed the City's process of developing our 2045 Vision Plan, Comprehensive Plan and Land Development Code and provided input at each stage of the process, going back to the EAR sessions in 2019. We have posted our work to date at aiwg.org. We clearly understand the many challenges involved in this process and greatly appreciate the extensive efforts of the Planning Staff, WGI Consultants and the members of the Planning Advisory Board. We do believe that the current Vision Plan draft incorporates an appropriate foundation that has the potential to become a highly effective set of documents. Together with the Charter, they will serve as the legal framework for the City. The following comments provide our initial input on the Vision Plan draft (<https://www.fbfl.us/DocumentCenter/View/22928/Vision-2045>).

Foundational Concepts

The Comp Plan/LDC Working Group strongly supports the use of resiliency, sustainability and preservation as the foundation for the Fernandina Beach Vision Plan, as stated in the plan and articulated by our community.

"Lens"

We would, however, prefer to conceptualize and understand the relationships among environmental, economic and social sustainability and resiliency through a **systems integration "lens"** rather than a "triple bottom line" lens because it **provides a unifying "lens" for our community** (Refer to the introduction of the March 11 video, aiwg.org) These three aspects of sustainability and resiliency are tightly intertwined and interdependent. For example, from a broad perspective, in Fernandina Beach, our economy is highly dependent on our environment, yet a successful economy is essential for protection of the environment. Similarly, these variables provide quality of life for the community and the community provides a foundation for a strong economy as well as preservation of the environment. Looking at these aspects of sustainability and resiliency as integrated and inseparable reflects the relationship among these aspects of our community more realistically than a "bottom line" concept, which might be more appropriate for a corporate context, and in our experience, we have seen that it can help to unify the community. (See also <https://hbr.org/2018/06/25-years-ago-i-coined-the-phrase-triple-bottom-line-heres-why-im-giving-up-on-it>)

For a similar reason, we are somewhat concerned about the use of the term "balance," which implies that we are dealing with opposing forces. We are concerned that continued reliance on this concept will simply further the divisiveness in our community and leave City staff with the existing challenges. We feel that a systems integration "lens" is more reflective of reality, more in line with current scholarship and more effective in unifying our particular community.

Vision and Mission Statements

Despite our concern about the “balance” lens, we do think the vision statement and mission statement are strong. Of course, we still prefer the statements we wrote last April:

Vision Statement

The City of Fernandina Beach will maintain environmental, social and economic sustainability and resilience. As a model of good stewardship of the natural assets on our barrier island, Fernandina Beach encourages development of the quality of life and success of our community without increasing size or density. The City will utilize innovative, strategic leadership to meet the needs of the present without compromising the ability of future generations to meet their own needs. The City will also engage and incorporate diverse input from city and island residents, community and business leaders and seasonal visitors in such a way that honors the historic, environmental and cultural features of the City.

Mission Statement

The City of Fernandina Beach will utilize innovative, strategic leadership to meet the environmental, social and economic needs of the present without compromising the sustainability and resilience of its future.

Executive Summary

The only concern we have regarding the executive summary relates to the last bullet at the end. The first three bullets at the end of the executive summary are fine. In consideration of our concern regarding the concept of “balance,” we would prefer to see the following concept replace the last bullet: “The City of Fernandina Beach must meet the environmental, social and economic needs of the present without compromising the sustainability and resilience of its future.”

Choice of Themes

The Comp Plan/LDC Working Group supports the themes that have been selected in this draft of the Vision Plan. Unfortunately, there is confusing overlap between Preservation of Character, Livability and Mobility and Transportation that needs to be sorted out. These same three sections also need considerably greater depth.

Several additional areas stood out to our group as being major issues that need to be addressed in greater depth. These are areas that we found dominant as we were researching, analyzing and compiling our draft Comp Plan. They are also among the greatest challenges the City faces and all three impact every aspect of city planning and governance. In this Vision Plan, they could be addressed as additional themes or through greater detail within each of the existing themes. These areas of concern are long-term planning, collaboration with the County and public trust.

- a. **Long-term planning:** The City cannot develop an effective plan for the future without effective long-term planning; in fact, it can't even maintain its own offices without effective long-term planning. Long-term planning (at a minimum, 20 years; preferably 45 years) must address specifics like product/structure life cycles and contemporary dollars.
- b. **City-County collaboration:** Both the City and County simply must be willing and able to collaborate in order to identify and benefit from the effectiveness and efficiencies of such collaboration. We saw multiple cases of the importance of this in every element of the Comprehensive Plan—in other words, it is critical to every aspect of governance, for both the City and County.
- c. **Public trust:** The City's public trust ratings on local surveys document the lack of public trust, and we see the impact this has on what the City is able to achieve in every aspect of planning and governance.

Yet another important area of concern that relates to public trust is the City's **communication limitations**. The City often has important information to share or interesting programs, but unless Main Street is involved, few residents may hear of them. Examples of this are the Heritage Tree Program (a session is planned in January 2022, but the program has existed for many years), the Land Conservation program and the opportunity to donate (following a brief period of discussion, all fell silent), and Nassau/TRANSIT (while this is not a City program, it is important for City taxpayers). We would like to see City Staff develop consistent and more effective strategies for communication.

The Comp Plan/LDC Working Group is particularly concerned about the **apparent drive to increase density**. From our perspective, this is a direct contradiction of three of the five themes of this vision plan: environmental sustainability and resiliency, preservation of character and livability. We also feel that it will prove counterproductive to the long-term economic welfare of the City. In the examples that have already been implemented, we have seen that moving buildings close to the street and increasing density is a threat to established trees and inhibits the movement of wildlife, effectively closing off the last remaining corridors. Impact on our natural stormwater processing and temperature moderation will make the City less environmentally resilient. Since much of our tourism and economic foundation is based on the small-town character of the City and most residents move here because of this character and our canopy, this choice of direction could be gravely detrimental to the City and its businesses. Further, academic research has demonstrated that there are other avenues to municipal success.

Specific Edit to Vision:

In the section explaining **social resiliency** on p. 2, we have the following:

Social resiliency looks at how all members of the community can prosper in the future. This includes identifying the social threats of gentrification and how lower-income and minority residents can adapt and remain a part of the Fernandina Beach community.

While this implies that only lower-income and minority residents need to adapt to remain part of the community, we feel certain that the intent is that the community as a whole may need to adapt in order to retain a diverse, healthy community. Therefore, we recommend the following wording for the highlighted section: “how our community can adapt to ensure that our lower-income and minority residents--many of them descended from this City’s founding families--remain a part of the Fernandina Beach community.”

The Themes: Comments & Questions on Each Theme

In each theme, we see references to related strategies and/or projects, but an obvious question remains: **how will these be implemented?** The 2045 Vision Plan and Comprehensive Plan should provide a framework for implementation. Further, we need to remember that **enforcement** is a critical aspect of all policies.

Theme 1: Environmental Sustainability & Resiliency

- Environmental sustainability and resiliency are priorities of the vast majority of citizens. They are fundamental to economic and social sustainability and resiliency.
- It is important that we keep in mind the fact that barrier islands are inherently non-resilient, and whatever resilience they have is reduced substantially by increasing development.
- p. 5 Dune Management Program: We are not familiar with a Dune Management Program completed to date in the City.
- p. 7 Goals: “The City’s waterfronts, beaches, and wetlands will be resilient to the impacts of humans and climate change.” & “The City will be resilient to the impacts of storm surge, sea-level rise, or flooding.”
 - These goals seem to overlap considerably. Perhaps the distinction could be clarified, or they could be combined.
 - We would like for the following to be included and quite clear:
 - Development of a **Beach/Dune/Nearshore Management Plan** that will promote the following goals:
 - 1) Getting the City out of the FEMA V- Special Flood Hazard Zone, using strategies such as dune growing with native dune plants and sand fences, where appropriate
 - 2) Improving the habitat value for native flora and fauna in offshore dunes, and
 - 3) Improving the safety and ease of beach access. This includes planning and maintenance of walkovers and drive-overs, controlled beach access paths and promoting dune growth through use of native dune plants and sand fences, where appropriate.

- **Amelia River Shoreline Resiliency Planning** that includes living shorelines, marsh habitat and wider buffers as transition zones with appropriate shape and vegetation to help protect the shorelines.
 - **Potential Wetlands Protection Plan**
 - **Enforced restrictions on building in the 100-year and 500-year floodplain**, particularly the former.
 - **A public education program for visitors and residents alike** to help preserve our barrier island and enhance the barrier island experience for everyone.
- p. 7 We support the appointment of a **Chief Resiliency Officer** and consideration of collaboration with the County, but do have concerns that this position could be given to a non-expert when this is such a critical content area. Credentials and independence are two critical factors for such a position.
 - We recommend the addition of two goals to the Environmental Sustainability and Resiliency theme:
 - Ensure the **quality of water in retention ponds**. We need to ensure that state, SJRWMD and county standards are clear to the public and that they are met and maintained. We need to establish a periodic testing system for these ponds and significant points of stormwater discharge.
 - Ensure air quality in our community and indoor ventilation systems. We need to establish periodic testing for air quality in various parts of our community. We also need to set and enforce high standards for indoor ventilation systems.

Theme 2: Preservation of Character

- Preservation of character is another top priority for both our residents and tourists, yet we need further depth and detail.
- We need to include **protection of Bosque Bello, parks and rights of way**. All staff or contractors working with these areas must be trained and have credentialed oversight. (Refer to Goal 2.06. in our draft Comp Plan.) This problem relates to preservation of the City's history, environmental and economic sustainability and resiliency.
- Addition: Should we include a goal related to **support for retaining current or traditional/long-standing businesses?**
- p. 9 The **design professionals** concept is a great idea. We recommend moving it to the Quick Win or Short-Term category in the timeline because we feel that our best design professionals will be willing to participate. ("Establish a resource bank of local design professionals and engineers to provide low-cost service to property owners at risk of enforcement violations or demolition by neglect.")
- p. 9 We are concerned that **reducing the land area requirement for PUDs** could further threaten our urban canopy. As stated above, we do not feel that increasing density contributes to preservation of character and believe that it seriously impacts livability and therefore poses a potential threat to the entire economy of the City.

Theme 3: Livability

- Livability is an important theme for Fernandina Beach residents and tourists as well. In fact, it has attracted many to the city. Thus, we need further depth and detail.
- p. 11 no **parking deficit**. This may be true downtown except when there are events. However, it is a problem near the beach, where property owners found people parked on their lawns and irrigation systems pre-COVID.
- p. 12 is vague on strategies for studying and addressing parking issues. This relates to **mobility/traffic issues and needs to be studied in a holistic manner**, as indicated in Theme 5 below. We do need to be more definitive, at least regarding study.
- Affordable housing and workforce housing are critically important issues that could have a major impact on the future economy of the City if we fail to address these problems. We strongly support creation of a **Workforce Housing Action Plan** as soon as is feasible. Many communities in the country have considerable experience coping with this problem, and we can learn from them. Recent research has documented the shocking insufficiency of affordable housing throughout the U.S. and that this is greatly exacerbating homelessness, another related issue the City needs to address. **Should the Workforce Housing Action Plan be expanded to include affordable housing and homelessness?** They clearly overlap.
- Regulations on **airport noise and noise related to downtown public events** is critical. We incorporated relevant language in our Draft Comp Plan [e.g., Goal 7.08.03 and 7.12.01-02. and Goal 6.18.05.).
- We were somewhat surprised to read the first goal in this theme: “Fernandina Beach will **balance the needs of visitors and residents** by capitalizing on its tourism economy to reinvest in the local community.” This sequence infers that the needs of visitors have higher priority than the needs of taxpaying residents.
- The last goal under this theme reads “The City will increase its economic resiliency by diversifying its industry sectors and maintaining its working waterfront.” As addressed in Goal 9 of our draft Comp Plan and in webinar 3 on March 25 that focused on economic development, we feel that it is **critical that the City and County have a more in-depth understanding of the current macro- and micro-economic structure and dynamics**. While substantial changes in these dynamics began long before the pandemic, we have seen further changes since the pandemic began and many of those changes seem to be contributors to more dynamic change in the economy. We think it is wise for both the City and County to study these changes and directions as thoroughly as possible, so that they can be integrated into planning. This point is also important for Theme 4.
- Another option for including the working waterfront as a goal would be the following: “Protect the continuing viability of our working waterfront at the downtown marina, which has both economic and cultural value to our City.”
- The City needs to collaborate with major employers like the mills, Port, and hospital. However, those employers need to adhere to their agreements with the City and be sensitive to the range of variables essential to the City’s future.

Theme 4: Future-Ready Infrastructure, Utilities & Public Facilities

- Future-ready infrastructure, utilities and public facilities are critical for all aspects of sustainability and resiliency. Again, more depth and detail are needed.
- p. 14 Connectivity and other utilities: **Reliability of all utilities is critical, including connectivity.** Unfortunately, our electricity and connectivity have thus far been inconsistent. We need to improve that for the future. It will also be essential to ensure that broadband and all connectivity be **affordable for residents.** Otherwise, we will be defeating our purpose. We will need to leverage the influence of the City to ensure that this happens; we cannot rely exclusively on market forces for this.
- Mid-term (6-15 years): “Construct northern half of **Waterfront Resiliency Project** (Lots A & B)” We recommend that the entire Waterfront Resiliency Project be completed as soon as possible and definitely prior to 2030.

Theme 5: Mobility & Accessibility

- Mobility is clearly an important issue for the City, yet it is probably not an area the City can manage effectively in isolation. It is a City challenge, but it is also a County and a regional problem.
- **Study and planning for transportation and parking** are important, but a broad, holistic approach needs to be taken, including all types of transportation and parking for the entire island and hopefully the entire county, in order to develop a plan that will work well for the community for more than a brief period of time. We need considerable creative thinking in developing effective mobility solutions, and we need the engagement and strategies that can be provided by all of our major employers, the mills, the Port, healthcare providers, the School Board, the TDC, businesses that regularly receive significant shipments, our citizens, etc. Everyone can contribute to planning our mobility for the future. At this point, however, we need a clear holistic plan for study and analysis.
- The City has begun participating in a limited way in the **North Florida Transportation Planning Organization (TPO)**, which should lead to expanded information, resources and support. We would like to see this participation expanded further and communicated.
- **Complete Streets** has been adopted by a number of communities nationally. However, we have seen no evidence that it is appropriate for a small barrier island where incompatible development patterns have been established for many years. We would prefer that a plan be developed specifically for this island or City. If Complete Streets is adopted, it will be of utmost importance that the values, character and form of the City be built into the plan.
- A number of items in the current Comp Plan are also part of Complete Streets, yet they simply don't fit the way Fernandina Beach and Amelia Island have been designed and built to date. As a result, adoption of such notions could prove to impact preservation of the character and livability of the City negatively. Use of such notions needs to be considered carefully.

- pp. 15-17
 - Publicize availability of Nassau/TRANSIT, routes and frequency
 - By comparison to other parts of the country, Amelia Island is definitely **neither bike-friendly nor safe**. Yet, this can be changed with minimal costs through: a) safety training & requirements for drivers; and b) trail safety/courtesy training for trail users, sponsored by Amelia Island Trails. The need for this extends throughout North Florida (at least), but our concern here is safety and quality of life for the citizens and visitors in our community.
 - p. 17 What is the relationship between the JTA effort and Nassau/TRANSIT?
 - We noticed that alternative methods of transportation mentioned include only bicycles and buses. We feel that a thorough holistic study should take place before we draw conclusions.

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

Respectfully submitted,

Wendelle Burdick, Warren Buchanan, Patricia Bux, Richard Doster, Beth Foster, Lauree Hemke, Terry Grady, Frank Hopf, Betsie Huben, Carlton Jones, Cynthia Jones-Jackson, Margaret Kirkland, Tammi Kosack, Alexandra Lajoux, Roger Nordlinger, Robert Prager, Faith Ross, Ron Sapp, Elise Pearlstine, Leonard Pearlstine, Richard Polk and Joyce Tuten

Comp Plan/LDC Working Group
aiwg.org