



Conserve Nassau

1417 Sadler Road, #187, Fernandina Beach, FL 32034

April 23, 2023

Dear Commissioners,

The County's reduction of coastal building height in 2021 was appropriate and in line with both the foundation of our economy and the State's encouragement to improve coastal sustainability and resiliency through resiliency grants, development of Regional Council resiliency collaboratives like Resilient First Coast, and development of a state-wide vulnerability database (<https://floridadep.gov/ResilientFlorida>). Cities and counties across the state have been conducting vulnerability studies, actively participating in FEMA's Community Rating System, hiring floodplain managers and chief resiliency officers, upgrading building standards and updating their Comprehensive Plans and Land Development Codes. These efforts are forward-looking--efforts to prepare for and manage our future. They are also efforts to help citizens prepare for and manage our future.

Rather than looking forward, voting to accept the Riverstone settlement seems to be looking backward to an understanding of the environment and models of operation of the past. It is committing the County and its citizens to far greater long-term costs in terms of our economy and the impact of sea level rise, flooding and global warming to achieve a lesser short-term savings--less Bert Harris litigation. Does this make sense? Are we being short-sighted?

The long-term costs of allowing new towers on the island include the following:

- **Impact on the foundation of our economy:** The Nassau County tax base is largely dependent on Amelia Island tourism, and natural resources are an essential part of Amelia Island's sense of place that attracts tourists. Gil Langley, head of the Amelia Island Tourist Development Council and CEO of the Amelia Island Convention & Visitors Bureau, often states that our environment is the foundation of Amelia Island tourism. Based on our experience with residents, we know that this environment and the small-town character of Fernandina Beach are major attractions for property owners as well. We know from the research of Ed McMahon and others that the sense of place (unique character) of a location is critical to its future economy (<https://www.youtube.com/watch?v=qB5tH4rt-x8>). In fact, it is our competitive edge. Loss of our sense of place could prove quite costly for all in the county. Conservation of this land would strengthen our sense of place (especially if we incorporate education) and add value to our economy.
- **Impact of storm damage, sea level rise, etc. on the County:** Removing and weakening our environmental protections (our maritime forest and dune structure) will increase the fiscal impact of such events on the county. A number of articles have been published recently predicting the loss of real estate taxes and a weakened economy in local jurisdictions that will result from sea level rise, flooding and other disasters. The following study, which predicts that at least \$108 billion in assessed values are at risk nationally from sea level rise by 2100, also contains a link to its research on specific counties, including Nassau County: <https://assets.ctfassets.net/cxgxcgtp8r5d/2KKeTjnqbFelWrZalnPeRR/9a28719038f3a1dddb>



[dd2e8b78b8455b/CC_Sinking_Tax_Base_20220908a.pdf](#)). Some commissioners feel confident that coastal storm or flooding damage will be at least partially reimbursed by the federal and state governments. However, FEMA has long discussed changes to their problematic system of disaster response, and they already have tremendous debt. In the future, the costs may well be far more than either the federal or state governments can manage, and Florida is one of the most vulnerable states in the nation. We cannot assume that local governments will be bailed out.

- **Impact on the insurance industry and our citizens:** Any impact on risk will further impact the insurance industry in Florida. We live in a state where the insurance industry is quite unstable, with vanishing and insolvent companies. The state program designed to respond to this crisis is quite expensive. We also need to be quite careful that we don't increase our FEMA CRS rating and make flood insurance rates rise even higher. Many cannot afford insurance, particularly not flood insurance at current rates. As a result, many citizens will be displaced by flooding and lose everything they have. (<https://news.climate.columbia.edu/2022/11/03/with-climate-impacts-growing-insurance-companies-face-big-challenges/#:~:text=In%20additio>; <https://the1a.org/segments/how-climate-change-factors-into-home-insurance-pricing/>; <https://www.washingtonpost.com/climate-environment/interactive/2023/obx-rodanthe-erosion-rising-sea-levels/>)

Land conservation is one of the most effective examples of nature-based approaches to sustainability and resiliency and an approach we have adopted as a county. To demonstrate the rather dramatic changes in how major traditional professional groups are preparing for the future, we are including a link to a day-long workshop sponsored by the National Academies of Sciences, Engineering and Medicine in collaboration with the US Army Corps of Engineers' Engineering with Nature Program and the Water Institute of the Gulf. In [Measuring What Matters Towards a More Comprehensive and Equitable Evaluation of Benefits | National Academies](#), the speakers represent governmental agencies, engineers, scientists, businesses, NGOs, the insurance industry and the World Bank. It is worthwhile to sample the presentations in the first half of the program to get a sense of what they are doing. Then, in **Session 5**, we recommend watching the relatively brief presentations of:

- 1) Sarah Murdock of The Nature Conservancy, starting at around 5 minutes and particularly where she talks about the cost of future damage versus conservation;
- 2) Kari Mavian of DOW, starting around 13 minutes, who talks about the business case for nature-based solutions with examples. She also talks about tools that DOW uses; and
- 3) Brett Stewart, Manager, Loss Prevention and Education for AXA, the 4th largest insurer in the world, starting at around 32 minutes.

By participating in collaborative efforts to research and implement nature-based approaches, they are addressing climate issues effectively and economically.

The future of our county is in your hands, not only in this decision, but in less obvious approvals and the establishment of priorities. The longer we defer more forward-thinking approaches to coming hazards, the greater the impact on our taxpayers. As a result, we feel that a far more productive investment in the long-term future of Nassau County would be the purchase and conservation of this parcel, perhaps for addition to the State Park. We feel that a combination of federal and state funding, a portion of



CLAM funding, help from land trusts and local fundraising would enable us to cover this cost. This approach would:

- Enhance the current foundation of our economy,
- Maintain the protection of the south end of the island and the county mainland that is provided by the maritime forest and dune structure on this parcel,
- Contribute to lowering our FEMA Community Rating and perhaps provide a foundation for more stability for our county in the insurance industry.

Respectfully submitted,

Founding members of Conserve Nassau



Wendelle Burdick, Patricia Bux, Lauree Hemke, Terry Grady, Frank Hopf, Pastor Carlton Jones, Cynthia Jones-Jackson, Margaret Kirkland, Tammi Kosack, Alexandra Lajoux, Roger Nordlinger, Elise Pearlstine, Len Pearlstine, Richard Polk, Robert Prager, Faith Ross, Ron Sapp, and Joyce Tuten, Founding members of Conserve Nassau

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