

The Honorable Al Ferraro
Jacksonville City Councilmember
117 W. Duval Street
Jacksonville, Florida 32202

Dear Councilman Ferraro,

In 2020, we along with many others voiced our opposition to the proposed rezoning of ~48 acres along Cedar Point Road from AGR to RR because of flooding and safety concerns as well as impacts to water quality and wildlife.

We thank you and your colleagues for also opposing this proposal nearly three years ago.

Recently, this rezoning request has been resubmitted without addressing our outstanding concerns or those of the surrounding community.

We respectfully request the opportunity to meet with you to discuss the following issues.

Flooding & Safety Concerns

Our current comprehensive plan and zoning has already determined that this area is not compatible with a PUD style development of this density.

- Development of this kind leaves the City of Jacksonville more vulnerable to future storms and flooding along Cedar Point Road and Terrapin Creek.
- It also increases the potential flooding impacts to current residents and gives future property owners a false feeling of safety.

While the proposed development may increase the elevation for the newly constructed homes, the nearby roads and waterways already flood. This fact is documented in flood maps, by the COJ Planning Department reviews, and from testimony of nearby residents.

The Storm Resiliency and Infrastructure Development Review Committee, Adaptation Action Area Working Group, and the 2020 Resiliency Committee were all initiated by the city to address flooding and drainage concerns in Jacksonville.

Denying the project as currently proposed would support these efforts.

Losing wetland capacity, forested tree canopy, and pervious surfaces for water retention on nearly 48 acres will impact the entire area and the current rural residents who may need to evacuate during major storm events.

Water Quality & Wildlife

In addition, this project threatens water quality.

- The addition of 100 400 people immediately abutting a wetland will negatively impact its ability to hold and absorb water and provide water quality functions.
- The loss in tree canopy will lead to runoff and increased polluted Stormwater from the new homes, yards, driveways, and roads.
- This area is an actively managed forest with regular prescribed burns, critical to protect
 us from forest fires. Putting hundreds of people in this area will make those processes
 more difficult or prevent them all together. Biodiversity is greatly enhanced because of
 this natural process.
- This project is proposed along the headwater segment of Terrapin Creek. All impacts from this development will reach all of Terrapin Creek including Clapboard Creek and the St. Johns River.

Unfortunately, the ecological health and integrity of the St. Johns River system is threatened due to years of wetland loss, urban sprawl, and the cumulative impacts of a growing population. The annual State of the River Report for the Lower St. Johns River Basin has consistently identified the health indicator for wetlands as "unsatisfactory" with "conditions worsening." The magnitude of wetland loss in Duval County is profound and solutions to remedy the problems are expensive.

The most affordable and effective solution is to follow our comprehensive plan which provides protection for wetlands and land along waterways and discourages development in rural areas. For additional information, please call me at (904) 509-3260 or email Lisa@stjohnsriverkeeper.org.

St. Johns Riverkeeper is a Florida nonprofit, membership-based organization headquartered in Jacksonville. Our mission is to defend the St. Johns River and advocate for its protection.

Sincerely,

Lisa Rinaman

St. Johns Riverkeeper

Lisa Kinaman