



IN REPLY REFER TO:

United States Department of the Interior

National Park Service
Timucuan Ecological and Historic Preserve
Fort Caroline National Memorial
13165 Mt. Pleasant Road
Jacksonville, Florida 32225



1D (TIMU-RSP)

September 4, 2014

Mr. Bruce Lewis
City Planning Supervisor
Planning and Development Department
214 North Hogan Street, Suite 300
Jacksonville, Florida 32202

Dear Mr. Lewis,

The proposed application for Planned Unit Development 2014-0531 is adjacent to the boundary of the National Park Service administered by Timucuan Ecological and Historic Preserve. The Preserve is included in a Special Management Area adopted by the City of Jacksonville to ensure that incompatible or inappropriate development that would disrupt the ecological integrity within the preserve boundary does not occur.

In our Land Protection Plan we have identified resources to be protected within the preserve boundary and on uplands adjacent to the preserve boundary which allow for protection of the natural ecology of the area. The most critical issues identified in our Water Resources Management Plan include impacts to the salt marshes from shoreline hardening, boat dock construction and wetland losses due to filling and water quality impacts from upland uses. Cooperation and coordination with state and city governments to protect these sensitive resources directly through land acquisition or indirectly through land development regulations and zoning is consistent with the preserve's approved management plan.

Recent investigations in the water quality and hydrology in the vicinity of this parcel indicate that pollutants flush downstream at a very, very slow rate. The water quality of the adjacent creeks shows high nutrient levels due to the low rate of flushing. Any additional development, especially for private homes, would result in the potential for degraded water quality from the urban impact of lawn fertilizers, buffer clearing and pet waste runoff. According to the State of Florida, the waters of the Timucuan Ecological and Historic Preserve are designated as Outstanding Florida Waters and are afforded the highest protection. No degradation of water quality is to be permitted.

The property is also upstream from the Timucuan Ecological and Historic Preserve Thomas Creek unit, a 924 acre parcel which is in active longleaf pine restoration, invasive species management and the full suite of forestry management tools including mechanical and controlled fire. Listed species which have been identified in the area and could occur on the property are four FNAI listed species of vascular plants and four rare animals per the 2010 Florida Forever Project Northeast Florida Timberlands and Watershed Reserve.

We have the following recommendations to address our concerns for water quality impacts from the proposed development consistent with the City's Comprehensive Plan:

1. Per Policy 2.7.3 to protect floodplain areas for the public benefit, we recommend that no residential development be allowed within the floodplain, rather these areas be permanently preserved for passive recreation to include multi-use trails for walking or bicycling, nature viewing and quiet reflection.
2. Per Policy 4.1.9 to protect water quality and preserve natural wetland functions, we recommend that a minimum 15 foot upland buffer between developed areas contiguous to Category I and II wetlands be required. That a low maintenance zone of a minimum 30 feet be established between any wetland. Planted buffers should consist of Florida Friendly landscape plants or ground cover that minimizes the need for fertilization, watering and mowing. These buffers should be depicted on all site plans, development plans and other documents submitted to authorize the review for development.
3. Per Policy 10.1.2 prohibiting new boat facilities in outstanding Florida waters north of the St. Johns River and west of the Atlantic Ocean. We recommend that no private boat docks, piers, ramps or ancillary structures be allowed within the development. The proposed public kayak launch would require a permit from the National Park Service per 36 CFR 1.2(a)(3).

We appreciate the opportunity to participate in the review of the proposed application in our partnership with the City to protect the natural ecology and Outstanding Florida Waters of the Timucuan Ecological and Historic.

Sincerely,



Barbara Goodman
Superintendent