



November 3, 2020

via email

To: Gwen Smith, [gwen\\_smith@nps.gov](mailto:gwen_smith@nps.gov)  
Rebecca Wood, [Rebecca.Wood@floridadep.gov](mailto:Rebecca.Wood@floridadep.gov)

Cc: Chris Abbett, [Chris\\_Abbett@nps.gov](mailto:Chris_Abbett@nps.gov)  
John Barrett, [John\\_Barrett@nps.gov](mailto:John_Barrett@nps.gov)  
Chris Hughes, [Chris\\_Hughes@nps.gov](mailto:Chris_Hughes@nps.gov)

Re: City of Jacksonville's Proposed Land Swap for Metropolitan Park

Dear Ms. Smith and Ms. Wood,

We are writing on behalf of Riverfront Parks Now to request that you deny the proposed conversion of Metropolitan Park in Jacksonville, Florida, submitted by the City of Jacksonville's Downtown Investment Authority (DIA).

*Riverfront Parks Now is a coalition of non-profits dedicated to the expansion and revitalization of urban riverfront park lands in Jacksonville. With eight well-respected non-profit organizations, we represent thousands of members and citizens who enthusiastically support our mission.*

*It is our view that public lands along the St. Johns River in the downtown provide a once in a lifetime opportunity for Jacksonville to meet the goals of the Florida State Outdoor Recreational Plan, through the renovation and expansion of the current 23-acre Metropolitan Park. An expanded park along the riverfront would provide recreation and health benefits, stimulate surrounding economic development, and create a more resilient community.*

The City of Jacksonville's proposal is inconsistent with all four of the Florida SCORP priorities, and does not conform with the requirements of 36 CFR Section 59.3 for LWCF assisted properties and the State of Florida LWCF State Assistance Program Manual and the Statewide Comprehensive Outdoor Recreation Plan (SCORP).

First, the proposal does not meet the criteria for CFR Section 59.3. (b)

Specifically:

**Criteria (1)** All practical alternatives to the proposed conversion have been evaluated.

***Does not meet***

Practical alternatives have not been fully evaluated. Riverfront Parks Now supports a clear alternative that has gained much public support, which is to renovate and expand the



current 23-acre park for updated and expanded recreational opportunities and provide for resiliency. The park has been neglected for over a decade, but still has great potential. The existing park has mature trees, walkways, a marina, electrical and plumbing.

**Criteria (2)** The fair market value of the property to be converted has been established and the property proposed for substitution is of at least equal fair market value as established by an approved appraisal (prepared in accordance with uniform Federal appraisal standards) excluding the value of structures or facilities that will not serve a recreation purpose.

***Does not meet***

The fair market value of either property has not been made public. It is hard to see how the smaller, contaminated, poorly configured land swap acres are of comparable value to the existing park. The proposed swap lands have remained vacant for 30 years due to such contamination and questionable development potential.

**Criteria (3)** The property proposed for replacement is of reasonably equivalent usefulness and location as that being converted.

***Does not meet***

The property proposed for replacement is not of reasonably equivalent usefulness and location as that being converted.

- Contaminated lands. The Shipyards property has known environmental contamination, which would need major remediation in order to be safe for recreational purposes. We have no knowledge of plans or funding for remediation.
- Smaller size and lack of comparable value. The NPS portion of the swap of Metropolitan Park does not provide adequate size or value. The City suggests swapping approximately 14 acres for only 11.8 acres, and those 11.8 acres are situated in a way that will reduce recreational value and limit opportunities for similar riverfront access.
  - Approximately four of the acres south of the park land are intended for the relocation of a museum.
  - Such museum would require driveways to access the building, thus further reducing the park space between the building and the road. Also, the park space would no longer be riverfront, and river views would be blocked by the building.
  - The horizontal and split nature of the proposed lands negates the current park configuration that allows for a gathering space and large events.

Other valuable components of the existing Metropolitan Park include a high value functioning marina for boating access, electrical and plumbing infrastructure, and large shade trees planted decades ago that provide important ecosystem services such as capturing and treating stormwater, removing carbon from the atmosphere, and reducing the heat index. The proposed lands provide none of these valuable elements.



In addition, it is our view that the 23-acre park needs to be considered together, and not split up or made smaller, even if the NPS only governs one part.

Second, the proposal does not meet the four priorities and key goals of SCORP.

Specifically:

### **Priority Area 1; Health and Well-being**

Goal 1-2

Increase the number of recreational activities in urban areas and rural communities.

#### ***Does not meet***

- The SCORP goals indicated that riverfront park lands should be increased, not decreased, in order to serve the needs of resiliency, a growing population, and emphasize a holistic, whole-health approach for people across the social and economic spectrum.
  - a. Metropolitan Park is a 23-acre park and the only park of its size in Jacksonville's downtown. While the NPS grant portion is 14 acres, the entire 23 acres of contiguous riverfront park lands has been managed together and must be considered in its entirety.

### **Priority Area 2: Public Access, Accessibility, Connectivity**

Goal 2-2

Improve universal accessibility on all public lands.

Goal 2-3

Ensure the appropriate conservation lands and waters are open and accessible for public use and are widely promoted.

#### ***Does not meet***

This swap is meant to offer Metropolitan Park land for private development. This will reduce public accessibility and recreational opportunities along the St. Johns River.

### **Priority Area 3: Economic Opportunities and Ecotourism**

Goal 3-1: Promote the economic benefits of outdoor recreation and ecotourism.

#### ***Does not meet***

The proposed swap will provide subpar experience of outdoor recreation and ecotourism compared to the current park size, configuration, and infrastructure.

### **Priority Area 4: Resource Management and Stewardship**

Goal 4-1

Encourage the conservation and protection of Florida's natural, historical, and cultural resources.

#### ***Does not meet***

Reducing park space will not provide adequate resource management or stewardship of the St. Johns river. Conversely, a well-designed riverfront park will provide the resilient



buffer from rising water levels, and further conservation of riverfront lands will be in the public interest.

In summary, the 23-acre riverfront park lands at Metropolitan Park are of high value, and should not be swapped for a less desirable, smaller, and poorly configured park.

It is a laudable goal to remediate and convert the Shipyard lands for additional park space, but they should not substitute for what we have today.

Thank you for your consideration.

Respectfully,

Riverfront Parks Now

Nancy Powell  
Jimmy Orth  
Barbara Goodman  
Susan Caven  
Ted Pappas  
Michael Kirwan  
Barbara Ketchum

Riverfront Parks Now is a citizen-led initiative representing the following non-profit organizations:

Scenic Jacksonville  
St. Johns Riverkeeper  
Sierra Club of Northeast Florida  
The Late Bloomers Garden Club  
The Garden Club of Jacksonville  
Greenscape of Jacksonville  
Memorial Park Association  
Jacksonville Urban League

[www.riverfrontparksnow.org](http://www.riverfrontparksnow.org)

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**Reference 1**

NPS CONVERSION requirements

<https://www.law.cornell.edu/cfr/text/36/59.3>

Section 6 (f)(3) of the L&WCF Act

“This section of the Act assures that once an area has been funded with L&WCF Assistance, it is continually maintained in public recreation use unless the NPS approves substitution property of reasonably equivalent usefulness and location and of at least equate fair value.”

**Reference 2**

Florida SCORP (Statewide Outdoor Recreation Plan Florida) 2019

Florida Department of Environmental Protection

<http://publicfiles.dep.state.fl.us/OPP%20Public%20Access/2019%20SCORP/1SCORP%20Chapters.pdf>

**Reference 3**

DIA Potential NPS Swap Combined Docs 10.1.20, separately attached in email

**Reference 4**

Riverfront Parks Now Commentary on Map

