



Everglades Coalition

1000 FRIENDS OF FLORIDA
ARTHUR R. MARSHALL FOUNDATION
AUDUBON OF FLORIDA
AUDUBON SOCIETY OF THE
EVERGLADES
AUDUBON OF SOUTHWEST FLORIDA
CALOOSAHATCHEE RIVER CITIZENS
ASSOCIATION/ RIVERWATCH
CLEAN WATER ACTION
CLEAN WATER NETWORK
COLLIER COUNTY AUDUBON SOCIETY
CONSERVANCY OF SOUTHWEST
FLORIDA
DEFENDERS OF WILDLIFE
DING DARLING WILDLIFE SOCIETY
EARTHJUSTICE
ENVIRONMENT FLORIDA
THE ENVIRONMENTAL COALITION
EVERGLADES COORDINATING COUNCIL
EVERGLADES FOUNDATION
EVERGLADES LAW CENTER
FLORIDA CONSERVATION ALLIANCE
FLORIDA DEFENDERS OF THE
ENVIRONMENT
FLORIDA KEYS ENVIRONMENTAL FUND
FLORIDA NATIVE PLANT SOCIETY
FLORIDA OCEANOGRAPHIC SOCIETY
FLORIDA WILDLIFE FEDERATION
FRIENDS OF THE ARTHUR R. MARSHALL
LOXAHATCHEE WILDLIFE REFUGE
FRIENDS OF THE EVERGLADES
HENDRY GLADES AUDUBON SOCIETY
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DIVISION
IZAAK WALTON LEAGUE FLORIDA KEYS
CHAPTER
IZAAK WALTON LEAGUE MANGROVE
CHAPTER
IZAAK WALTON LEAGUE OF AMERICA
LAST STAND
LEAGUE OF WOMEN VOTERS OF
FLORIDA
LOXAHATCHEE RIVER COALITION
MARTIN COUNTY CONSERVATION
ALLIANCE
NATIONAL AUDUBON SOCIETY
NATIONAL PARKS CONSERVATION
ASSOCIATION
NATIONAL WILDLIFE FEDERATION
NATIONAL WILDLIFE REFUGE
ASSOCIATION
NATURAL RESOURCES DEFENSE
COUNCIL
THE OCEAN CONSERVANCY
THE PEGASUS FOUNDATION
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SOUTH FLORIDA AUDUBON SOCIETY
TROPICAL AUDUBON SOCIETY
THE URBAN ENVIRONMENT LEAGUE
WORLD WILDLIFE FUND

May 17, 2013

Honorable Rebeca Sosa
Miami Dade County Commission
Stephen P. Clarke Center
111 NW First Street
Miami, FL 33128

Dear Chairwoman Sosa,

On behalf of the Everglades Coalition, an alliance of 57 local, state and national conservation and environmental organizations committed to the full restoration of the Greater Everglades Ecosystem, we write to generally support your staff's recommended amendments to the Comprehensive Development Master Plan (CDMP) in order to implement recommendations of the 2010 Evaluation and Appraisal Report (EAR), and provide suggestions on areas for improvement.

Urban Development Boundary

The EAR concludes that, based on current demographics and supply and demand analysis by the County, "an expansion of the UDB is not warranted to meet the needs for commercial and industrial lands" for the 2025 planning horizon. However, County staff has identified a 554-acre parcel to include within the UDB. The area in question is a proverbial "hole-in-the-donut" that was created as a result of previous Shoppyland and Beacon Lakes development initiatives, and is surrounded by lands already included within the UDB.

We are concerned that the proposed expansion will set a dangerous precedent of facilitating development without demonstrated need, and request that guidelines be mandated to ensure that this "hole-in-donut" land use scenario not be replicated in the future.

The Urban Expansion Area

The current EAR draft proposes to shrink the boundaries of the Urban Expansion Area (UEA) and Policy LU-8G. Policy LU-8G states, in part, that the County must avoid four types of land when considering locations for inclusion within the UDB. They are: (1) future wetlands; (2) lands designated for agriculture, (3) hurricane evacuation areas, and (4) lands that are part of the Comprehensive Everglades Restoration Plan (CERP).

The four existing UEAs are constrained in part by existing wetlands, wellfield protection areas, CERP footprints, and other types of land use that should be avoided for development. By modifying these UEAs, you can ensure that land identified for future urban expansion in each UEA is free from these constrains. We support these modifications and agree that no other area outside the UDB fulfills the criteria for inclusion within a UEA.

Density and Transit

We must start to make the necessary infrastructure investments toward areas where growth is desirable and planned. It is foolish to continue the battle between land preservation and economic growth when the two can easily work hand-in-hand.

By prioritizing density at targeted areas, we can create vibrant communities that support successful transit systems. This will allow our sensitive westward lands to be conserved for agricultural uses, wildlife habitat, and natural water storage. We ask that you consider the plethora of positive impacts that will emerge from establishing enforceable minimum density requirements at targeted urban infill locations, and adopt strong text in the EAR to encourage this type of development.

There is an urgent need to increase our county's mobility. The most efficient way to do this is to ensure that all residents have access to an affordable, energy-efficient, reliable and convenient public transit system. Alternative means of transit funding – like using a portion of Miami-Dade Expressway's resources – will become essential for us to develop the type of modern transit system our residents need to be economically viable. Successful transit can reduce traffic congestion and alleviate the burden on our overstressed roadways; it can also reduce the amount of greenhouse gases emitted each year, decreasing potential impacts of climate change.

Climate Change Mitigation and Adaptation

As a valuable member of the 4 county climate compact, and an active partner in the 7/50 regional planning process, Miami-Dade has the unique opportunity to emerge as a national leader in the mitigation and adaptation of climate change impacts. As the CDMP envisions future growth and plans for the locations of growth, it is critical to start assessing each new application with a climate filter in place that can be evaluated through multiple agency perspectives.

It is essential that commitment to Everglades restoration continue to be a top priority for our county. Water management structures will need to be modified, road-beds raised, drainage improved but if this issue is not addressed and envisioned in our comprehensive planning document now, we will be missing an opportunity to coordinate and ultimately create a safer, more economically-viable community for future growth.

For all these reasons, we are supportive of adopting the proposed new policies on climate change. However, many of the critical tools will not be implemented or even analyzed until 2017. Given the tremendous availability of data relevant to Miami-Dade and local climate experts, and the reality that we are already experiencing climate impacts, we urge you to accelerate these initiatives.

We would urge MDC to be an example of a community seeking to reduce its carbon footprint and advocate for carbon reduction nationally and worldwide.

Conclusion

You are in the unique position to positively influence the growth of our county and leave a legacy for future generations. Thank you for your time and consideration of these important issues.

Sincerely,



Dawn Shirreffs
National Co-Chair
954-961-1280 x 205
dshirreffs@npca.org



Jennifer Hecker
State Co-Chair
239-262-0304 x 250
jenniferh@conservancy.org

Cc: Members of the Board of County Commissioners
Mayor Carlos Gimenez
Mark Woerner

