



EVERGLADES COALITION

August 23, 2021

Chairman Jose “Pepe” Diaz
Board of County Commissioners
Miami-Dade County
111 NW 1st Street, Suite 220
Miami, FL 33128
district12@miamidade.gov

RE: Comments on CDMP20210003 - Application to Amend the Comprehensive Development Master Plan (CDMP) for the South Dade Logistics and Technology District (SDLTD)

Dear Ms. Douglas:

Dear Chairman Diaz:

We submit the following comments on behalf of the Everglades Coalition, an alliance of conservation and environmental organizations dedicated to full restoration of the greater Everglades ecosystem—from the Kissimmee Chain of Lakes into Lake Okeechobee, through the “River of Grass,” and out to Florida Bay and Biscayne Bay. The Everglades is widely recognized as one of the world’s unique and spectacular natural wonders, and Florida has a compelling interest in protecting and restoring the ecosystem due to its tremendous economic and ecological value. In addition, Everglades restoration is a key tool to improve climate resilience and protect water resources for Miami-Dade County.

We write in opposition to CDMP20210003, an application to change the future Land Use Plan map and text of the Miami-Dade County Comprehensive Development Master Plan (CDMP) to facilitate a primarily industrial development with ancillary commercial and hotel uses. **We ask you to support the findings and recommendations of the County's Department of Regulatory and Economic Resources professional planning staff and deny and do not transmit the application of the proposed 793-acre development.**¹

Recent findings provided in County planning staff’s Urban Expansion Area (UEA) report states that there is no need to expand the Urban Development Boundary (UDB) under Comprehensive Development Master Plan (CDMP) Policy LU-8F until 2030², at the earliest, and the application in question fails to meet the requirements outlined in Policies LU-8G and LU-8H.³

¹ [Miami-Dade County Staff, Staff Recommendations, Application No. CDMP20210003 Aligned Real Estate Holdings, LLC, et al., Commission District 8, 2021 Out-of-Cycle Application.](#)

² [Department of Regulatory and Economic Resources, Planning Division, Research Section, Urban Expansion Area Report \(Miami-Dade County: RER, 2021\).](#)

³ [Miami-Dade County, Staff Recommendations.](#)

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Additionally, this proposal will have consequences for ongoing restoration efforts, including the Biscayne Bay and Southeastern Everglades Ecosystem Restoration (BBSEER) Project, which is intended to restore parts of the South Florida ecosystem that have been affected by over-drainage and damaging freshwater releases from canals. Everglades National Park and Biscayne National Park are unique and invaluable assets to Miami-Dade County. The current canal and flood risk management system that dominates this region is causing havoc on the quality of these ecosystems, and consequently, the ecological and economic health of the region.⁴ The goal of BBSEER is to improve the health of the Southern Everglades and Biscayne Bay; Miami-Dade County has a tremendous interest in the successful outcome of this restoration project.

The BBSEER Project Delivery Team – made up of local, state, and federal agency experts working collaboratively to plan this significant project – is currently evaluating solutions to these problems, especially within the C-102 and C-103 basins, which include the area proposed for development in this application near the Homestead Air Reserve Base (HARB). Miami-Dade is a partner in the BBSEER planning process and will be the main beneficiary of the delivered ecosystem benefits; therefore, the County should ensure that there are no obstacles to ongoing restoration efforts. Approving this application will go against the objectives and restoration efforts of BBSEER. For reference, we have attached a map and overview of the BBSEER project (Attachment A).

The Everglades Coalition therefore urges you to deny this application on the following grounds:

- The County's professional planning staff has determined there is no demonstrated need to expand the UDB under CDMP Policy LU-8F.
- The proposed project footprint includes every land use type identified as areas that "shall be avoided" under CDMP Policy LU-8G.
- The project does not meet the necessary criteria to justify an expansion of the Urban Development Boundary outlined under CDMP Policy LU-8H.
- The project area does not meet level of service requirements for new developments.
- The project does not align with County goals to minimize sprawl and support major infrastructure improvements within the UDB, does not meet level of service requirements for new development, and the applicant has not identified how it will fund infrastructure improvement needed without increasing burdens to County taxpayers.
- The site is highly vulnerable to sea level rise and storm surge impacts.
- The proposed development could limit restoration options or operations for the Everglades and Biscayne Bay restoration efforts, and thereby undercut potential ecological benefits generated by significant state and federal taxpayer investments.
- The project jeopardizes the County's water supply and impacts efforts to slow saltwater intrusion associated with sea level rise and climate change.
- The project would result in an unacceptable loss of agricultural land.
- The project would have negative impacts on traffic and transit.
- The economic impacts of the project are overstated and technically incorrect. Given the considerable scope of the project and cost to taxpayers, it is imperative that your review be based on verifiable and updated information and abide by the CDMP's requirements.

⁴ "Biscayne Bay and Southeastern Everglades Ecosystem Restoration - BBSEER," U.S. Army Corps of Engineers, accessed August 6, 2021, <https://www.saj.usace.army.mil/BBSEER/>.

- The project does not need to be a contiguous acreage or located in Biscayne National Park buffer lands. There are suitable alternative locations within the UDB.

In summary, the application fails to meet CDMP requirements for UDB expansion, promotes sprawl instead of infill development, has unproven economic merits, conflicts with the County's climate resiliency efforts, limits potential Everglades restoration alternatives and proposes a project that would negatively impact the surrounding environment.⁵

Based on the many reasons stated above, we ask that you support the findings of your professional staff's March 10th UEA Study⁶ and staff recommendation report to deny and do not transmit this application.⁷

Sincerely,



Mark Perry
Co-Chair



Marisa Carrozzo
Co-Chair

Cc: Mayor Daniella Levine Cava, mayor@miamidade.gov
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⁵ [Miami-Dade County, Staff Recommendations.](#)

⁶ [Department of Regulatory, Urban Expansion Area.](#)

⁷ [Miami-Dade County, Staff Recommendations.](#)

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Attachment A
Biscayne Bay and Southeastern Everglades Ecosystem Restoration Project

The Biscayne Bay and Southeastern Everglades Ecosystem Restoration (BBSEER) Project is formulating plans to restore parts of the south Florida ecosystem in freshwater wetlands of the Southern Glades and Model Lands, the coastal wetlands and subtidal areas, including mangrove and seagrass areas, of Biscayne Bay, Biscayne National Park, Manatee Bay, Card Sound and Barnes Sound. These areas have been affected by over-drainage and by damaging freshwater releases from canals, such as the C-111 Canal.

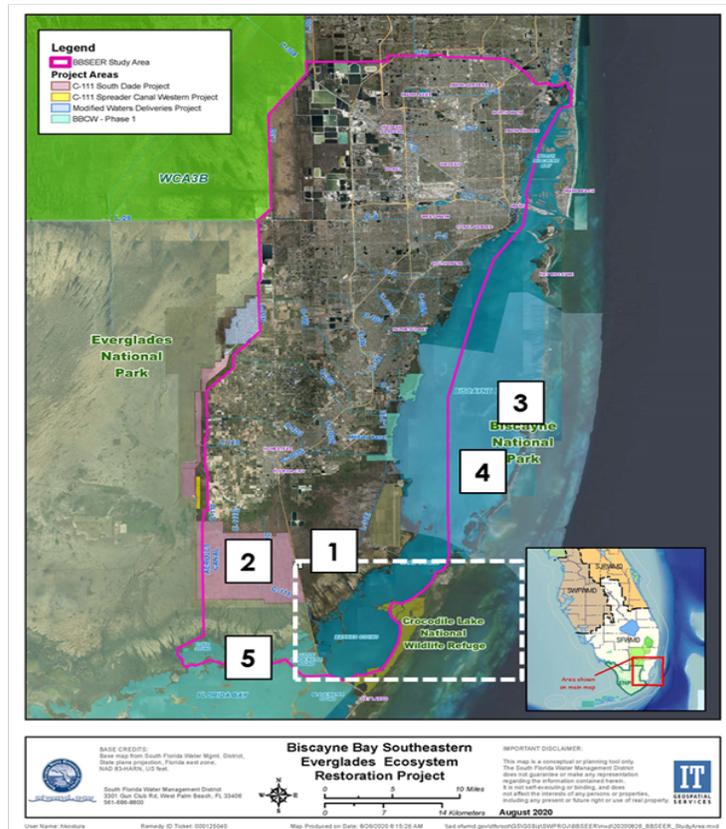


Figure 1: Project area for BBSEER 1: Model Lands, 2: Southern Glades, 3: Biscayne Bay, 4: Biscayne National Park, 5: Everglades National Park (ENP) Eastern Panhandle

Currently, multiple canals designed to provide flood risk management and protect water supplies transect the study area. The drainage system currently in place has transformed Biscayne Bay’s natural estuarine conditions driven by diffuse freshwater flows to a declining ecosystem driven by controlled freshwater pulses that have unnatural input locations to the Bay, and that provide water at unnatural times, in unnatural volumes, and with unnatural distributions. Historically, Biscayne Bay received fresh water from overland flow passing through the coastal ridge and wetlands, and from extensive groundwater seepage.

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These natural freshwater inputs produced a distinctive salinity gradient that supported the diverse habitats of the Bay. The drainage canals disrupted interconnected physical and chemical natural processes such as hydrology, salinity patterns, and nutrient inputs. The existing canals impact freshwater flows to the Biscayne Bay estuary by lowering the region's water table and reducing water storage in contributing basins; decreasing groundwater inflow to Biscayne Bay; and eliminating or altering natural tributaries. Drainage has permitted agricultural and suburban development in areas that were once vital wetlands and increased the flow of pollutants/nutrients to Biscayne Bay. Development of watershed lands and the commensurate control of water levels have contributed to the altered timing and duration of freshwater flows to Biscayne Bay.

Project Objectives

1. Progress towards restoration of a 500-m mesohaline strip year-round along the Biscayne Bay, Biscayne National Park, Card Sound and Manatee Bay coasts, and to reduce unnatural pulse releases.
2. Progress towards restoration of depth and duration of freshwater, and structure and function with improved native plant and animal abundances and diversity, in the eastern portions of the Model Lands, Southern Glades, Panhandle of Everglades National Park, and coastal wetlands not already included in the Biscayne Bay Coastal Wetlands Phase 1 project and moderate the encroachment of saline conditions into these areas anticipated with sea level rise.
3. Progress towards restoration of ecological and hydrological connectivity in the landside areas of the Model Lands, Southern Glades, eastern Panhandle of ENP, and Biscayne Bay coastal wetlands: Increase spatial extent of these restored natural areas and increase freshwater sheet flow and related patterns of hydroperiod between Model Lands, Southern Glades, ENP and Biscayne Bay coastal wetlands.
4. Increase ecological resiliency of coastal vegetation habitats in southeastern Miami-Dade County, including restoration of soils that help to resist sea level rise encroachment and effects.

Source: <https://www.saj.usace.army.mil/BBSEER/>