November 29, 2023

Board of County Commissioners
Miami Dade County
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Sent Via Email to the following:

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RE: Reject the Miami Wilds Theme Park Proposed on Environmentally Sensitive Land

Dear Commissioners:

On behalf of the Everglades Coalition, an alliance of nearly 60 organizations committed to the protection and conservation of America’s Everglades, we write to ask you to reject the Miami Wilds theme park proposed for construction in an environmentally sensitive area near Zoo Miami. This is an ecologically devastating development plan that threatens globally critically imperiled pine rocklands as well as dozens of rare and endangered species who live there (Miami-Dade County, 2023).
Pine Rocklands are considered a globally imperiled habitat unique to South Florida and the Bahamas. In Miami-Dade County (MDC), this slash pine forest once spanned more than 186,000 acres. Today, less than 2 percent of the forest exists in high elevation areas outside of Everglades National Park (Miami-Dade County, 2023). The proposed Miami Wilds theme park will be constructed directly adjacent to the Richmond Pine Rocklands, a 4-square-mile area that contains the largest contiguous fragment of Pine Rocklands in MDC (Figure 1.). The Richmond Pine Rocklands are home to many plants and animals found nowhere else on Earth. This area will become increasingly important for many of these pine rocklands species’ conservation as climate change and sea level rise destroy other, lower-elevation systems where many of these rare species live.

![Figure 1. Map depicting the Miami Wilds development footprint (red) within the largest contiguous fragment of Pine Rocklands in MDC. Map created by K. Clauser, Center for Biological Diversity.](image)

The proposed project area overlaps with critical habitat for the Miami tiger beetle and proposed critical habitat for the Florida bonneted bat, including key foraging habitat for the largest known population of the endangered bat. It also includes federally designated critical habitat for the Bartram’s scrub-hairstreak and Florida leafwing butterflies. The development site also neighbors proposed critical habitat for the Rim Rock crowned snake and three plants: Blodgett’s silverbush, Everglades bully and sand flax. Endangered plants like the Florida brickell-bush, and their critical habitat, are also adjacent to the site. While impacts to the bat are most apparent, there’s no question that building a commercial waterpark and retail development in this environmentally sensitive area would have cascading negative effects on surrounding pine rocklands and species by introducing pollution and driving environmental degradation. Most notably, prescribed fire necessary to maintain and conserve the pine rocklands will be hampered by encroaching new development because the development will leave no nearby open places to safely send the smoke (see generally Possley et al. 2018 at 38-42).

A water-based theme park can be located anywhere, but this rich and biodiverse ecosystem – which is a unique part of the Greater Everglades Ecosystem – only exists in a few places, including the area proposed for development. We are already rapidly losing what remains of the true natural Florida we all love. Please
do not recommit to developing this environmentally sensitive area. Instead, commit to a new vision that restores and protects the pine rocklands for generations to come. We urge you to reject developing the Miami Wilds theme park in this environmentally sensitive location and to explore alternative sites.

Sincerely,

Mark Perry
Co-Chair

Kelly Cox
Co-Chair
References

https://www.miamidade.gov/environment/pine-rocklands.asp