



EVERGLADES COALITION

August 26th, 2026

**RE: Preserving the North Trail Basin to Support Everglades Restoration –
Vote No on the Kelly Tractor Application (CDMP20230013)**

Dear Chairman Rodriguez and Miami-Dade County Board of County Commissioners,

The Everglades Coalition, made up of nearly 60 organizations dedicated to protecting and restoring America's Everglades and representing a network of more than 12.2 million constituents and supporters, respectfully urges the Miami-Dade County Board of County Commissioners to **vote no** on the Kelly Tractor Comprehensive Development Master Plan (CDMP) application. As organizations dedicated to protecting and restoring America's Everglades, we are concerned not only by the permanent loss of wetlands within the North Trail Basin, but also by the procedural precedent this application would establish for future development outside the Urban Development Boundary (UDB).

The North Trail Basin, where the Kelly Tractor development is proposed, is one of Miami-Dade County's most important remaining wetland landscapes for restoring and managing South Florida's natural hydrology. This Project would permanently impact 162 acres of high-functioning wetlands within this basin. These wetlands provide critical ecosystem functions and services that directly support the greater Everglades ecosystem and restoration objectives by:

- Filtering nutrients and pollutants before they reach Biscayne Bay and the Everglades;
- Attenuating floodwaters and reducing flood risks to nearby communities;
- Recharging the Biscayne Aquifer which serves as Miami-Dade County's primary drinking water source;
- Maintaining freshwater and habitat connectivity across the landscape supporting federally listed species including the Florida bonneted bat, Everglades Snail Kite and Woodstork, and
- Providing the ecological resilience necessary to adapt to sea level rise and climate change.

The Everglades Coalition is a 501(c)3 alliance of local, state, and national conservation organizations dedicated to the full protection and restoration of America's Everglades.

evergladescoalition.org



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Protecting the North Trail Basin is about safeguarding the natural landscape that supports the historic Everglades and ongoing restoration efforts. As Florida continues to invest billions of dollars through the Comprehensive Everglades Restoration Plan (CERP), preserving the remaining wetlands that were integral to the original design and provide critical functions is essential to maximizing the benefits of that investment. Once these lands are converted to intensive urban/industrial uses, those functions are permanently lost and cannot be recreated with the same ecological value elsewhere.

The Everglades Coalition and its member organizations are also concerned that this application relies on a CDMP text amendment to facilitate intensive urban land uses outside the Urban Development Boundary (UDB). As such, we do not have concurrent zoning, only a covenant and a draft map showing the proposed development areas and footprint. This approach highlights a procedural gap that allows urban development outside the UDB without the process, scrutiny, and standards normally associated with such a fundamental change to the County's land use planning framework. The use of a text amendment should be reserved for governmental or utility issues that benefit the greater good, such as a water treatment plant or utility for example. **The UDB remains one of Miami-Dade County's most important tools for protecting environmentally sensitive lands, the Everglades, and Biscayne Bay. Keeping it intact will determine the ultimate success of CERP, the long-term health of the Everglades and the sustainability of the County.**

For the continued success of CERP and the long-term resilience of both the Everglades ecosystem and Miami-Dade County residents, the Everglades Coalition respectfully urges the Board to **vote no** on this application. Developing outside the UDB is not necessary and moving forward without the full scrutiny of concurrent zoning and the full review process sets a concerning precedent. In addition, protecting the adjacent North Trail Basin wetlands safeguards the natural landscape that supports the historic Everglades and ongoing restoration efforts.

Sincerely,

Mark Perry
Co-Chair

Lauren Jonaitis
Co-Chair

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