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December 5<sup>th</sup>, 2011

Tropical Audubon Society  
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Mayor Carlos Gimenez  
Office of the Mayor  
Stephen P. Clark Center  
111 NW 1<sup>st</sup> Street  
Miami, Florida 33128

Dear Mayor Carlos Gimenez,

On Wednesday, November 30<sup>th</sup>, 2011 the Miami-Dade Board of County Commissioners voted 7-5 to transmit the Ferro Investment Group II, LLC application for review and comment to the State of Florida. We urge you to veto their decision and deny this transmittal. Tropical Audubon Society feels a fourth review of this application is unnecessary and is a waste of taxpayer dollars.

This application is on the southeast corner of S.W. 167 Avenue and S.W. 104 street intersection. Ferro Investment Group II, LLC seeks to change the current land use plan map designation from agriculture to business and office and to expand the 2015 Urban Development Boundary (UDB).

We oppose this application as it promotes urban sprawl, spot commercial development, and it promotes the loss of agricultural land. The Urban Development Boundary (UDB) was established to not only protect the Everglades, which recharges our aquifer and is ultimately our drinking water supply, but to also protect the thin slice of agriculture that we have remaining, our number two economic driver in Miami-Dade County. In *Growing for a Sustainable Future: Miami-Dade County Urban Development Boundary Assessment*, The Environmental Protection Agency (EPA) reported in 2010 that agricultural lands outside the UDB are dwindling and that we are at a gradual loss of farmland. This is threatening the "critical mass" required to sustain agricultural operations, now below ~57,000 acres.



This is the fourth time Ferro Investment Group II, LLC seeks to move the boundary line to allow a commercial project on agricultural land west of Kendall. In 2009, Application No. 4 was established at the same location to move the boundary 9.9 acres. The Everglades Law Center, Inc. found in 2009 that Application No. 4 was out of compliance with state law and inconsistent with Comprehensive Development Master Plan. The application fails to protect agricultural lands, enhance level of service standards for public services, prevent discontinuous and scattered development, does not present plans to accommodate projected population or economic growth, and adversely affects the West Wellfield Protection Area.

We agree with Miami-Dade planners to deny and do not transmit this application. No need exists to expand the UDB for commercial land in this area. Within 1 mile to the site to the North, there is a vacant 40 acre parcel that is for retail and businesses. There are already **246 acres that are commercially zoned or designated land that are currently vacant in the Metropolitan Service Area**. Miami Dade planners stated that the application does not demonstrate a need as required by policies in the Comprehensive Master Plan, specifically LU8F.

As Mayor you have the opportunity to lead and let tax payers know that you are going to hold the line by vetoing the transmittal of the Ferro Investment Group II, LLC application. Investing in infill and mobility improves the county over all and should be the priority for our future. Transmitting this application can lead to a flurry of other applications expecting the same result, send the message that you will lead on this issue and veto now.

If you wish to contact me about the application, do not hesitate to call at 786.543.1926. or by e-mail: [director@tropicalaudubon.org](mailto:director@tropicalaudubon.org). I would greatly appreciate time with you or your staff on other very important environmental issues including growth.

Sincerely,

A handwritten signature in cursive script, reading "Laura Reynolds". The signature is written in a dark ink on a light-colored background.

Laura Reynolds  
Executive Director