

- 350 South Florida • 1000 Friends of Florida**  
**• Caloosahatchee River Citizens Association**  
**• Center for Ethics and Public Service at the University of Miami School of Law •**  
**Clean Water Action • Defenders of Wildlife • Environment Florida**  
**• Florida Native Plant Society • Florida Wildlife Federation •**  
**Friends of the Everglades • International Dark-Sky Association • Last Stand**  
**• Love the Everglades Movement • National Parks Conservation Association •**  
**Progress Florida • Reef Relief • Sierra Club • Sierra Club, Broward Group**  
**• Sierra Club, Miami Group • South Florida Wildlands Association •**  
**Tropical Audubon Society**

October 5, 2015

Planning Advisory Board  
Miami-Dade County Planning  
Department of Regulatory and Economic Resources  
Stephen P. Clark Center  
111 NW 1st Street, 12th Floor  
Miami, Florida 33128

Dear Sirs and Madams:

We the undersigned organizations urge you to recommend denial of Applications Nos. 7 and 8 in the May 2015 Comprehensive Development Master Plan (CDMP) Amendment Cycle, because they propose to expand the 2020 Urban Development Boundary (UDB) to allow unnecessary and harmful sprawl of development. Application No. 7 seeks to change land zoned for agriculture to a new urbanized land use category, and Application No. 8 proposes to change land zoned for agriculture to "Industrial and Office" and "Business and Office." These changes to the UDB are unwarranted, because there is currently enough land within the UDB to sustain residential demand. Furthermore, these land use changes would allow development that would have serious environmental consequences for the Everglades, our national parks, and the water supply of Miami-Dade County's residents. Additionally, expansion of the UDB would cause increased costs associated with a higher demand of county services, along with increased traffic congestion. Therefore, the applications should be denied.

The CDMP Land Use Element sets out a growth policy that favors a focus on growth of existing urban centers while conserving and protecting wetlands and agricultural areas from development. Policy LU-8G of the CDMP requires that before considering expansion of the UDB, it must first be demonstrated that there is a need to add land to the UDB in accordance with Policy LU-8F. Policies LU-8F and LU-8G combined require that the UDB shall not be expanded unless there is not enough "developable land to sustain projected countywide residential demand for a period of 10 years after adoption of the most recent Evaluation and Appraisal Report (EAR) plus a 5-year surplus (a total 15-year Countywide supply beyond the date of EAR adoption)." The UDB currently

contains enough countywide supply to meet projected residential capacity for 19 years after the March 2011 adoption of the 2010 EAR (i.e., until 2030). This is 4 years past the 15-year minimum required for any changes to the UDB. Therefore, the criteria of LU-8F and LU-8G have not been met, and there is no justification for the expansion of the UDB.

In addition, Application No. 7's proposed changes to Policy LU-8F are unwarranted. The applicant recommends an extension of the minimum years of residential land capacity required for modifications to the UDB to be 20 years rather than 15 years. This policy change would allow for more expansions of the UDB to be permitted during amendment cycles. This would discourage infill and redevelopment, which are embraced by Objective LU-1 and Policies LU-1C and Policy LU-10A. These are in place to prioritize development in urban centers within the UDB. Allowing more frequent expansions of the UDB due to a 20-year minimum capacity would deter development in existing urban areas. Furthermore, this application would only provide just over one year's worth of supply to the countywide residential land supply, and this would be spread out over 20 years.

The UDB provides protections and benefits to the Everglades and our national parks by keeping these areas intact and safe from development, and therefore, expanding the UDB would severely harm the ecosystem. Moreover, development in these areas would impede restoration projects, including those of the Comprehensive Everglades Restoration Plan. Policy CON-7J of the CDMP states that "In evaluating applications that result in alterations or adverse impacts to wetlands Miami-Dade County shall consider the applications' consistency with Comprehensive Everglades Restoration Program (CERP) objectives. Applications that are found to be inconsistent with CERP objectives, projects or features shall be denied." These projects would increase noise and light pollution and impacts to wildlife within Everglades National Park (ENP) and would interfere with restoration and thus increase the cost and time needed for restoration by changing flooding patterns and flood control needed. Furthermore, increased development outside of the UDB would decrease the footprint of the Everglades ecosystem. Therefore, development of the proposed projects outside of the UDB is inconsistent with CERP and the applications should be denied.

The proposals would significantly shrink the important buffer zone between the UDB and ENP that currently helps to protect the park from the urban core of Miami-Dade County. Application No. 7 seeks to change the zoning of 859 gross-acres of land currently zoned for agriculture and outside the UDB to enlarge the UDB to include this acreage and to change the Land Use Map designation from Agriculture to a new urbanized land use category. Application No. 8 seeks to change the zoning of 61.1 gross-acres from "Agricultural" to "Industrial and Office" and "Business and Office." These projects combined would result in the removal of approximately 920 acres of active farmland to be replaced with urban development. By moving development westward, the region would lose both the ecological benefits of the current buffer zone as well as a highly desirable capacity for local food production.

Furthermore, the conversion of farmland to urban uses would increase the vulnerability of the region to sea level rise, impair the wellfield recharge areas, and augment saltwater intrusion. Allowing the area to be paved over in this region would limit the wellfield recharge areas and contaminate groundwater. Meanwhile, a rise in population would also increase demand on the water supply. Moreover, the Everglades ecosystem currently helps to maintain freshwater levels, however, sea level rise is an impending threat and will increase the risk of saltwater intrusion into the aquifer. Development in this region would reduce the benefits of Everglades restoration and make the region more vulnerable to the effects of sea level rise.

In addition, an expansion of the UDB to allow for development in this location would increase traffic and demand on county infrastructure. In particular, Application No. 7 includes provisions for the construction of 11,401 units of housing in a location that would require residents to commute to and from the area, thus exacerbating traffic congestion. Neither application sufficiently addresses an extension of mass transit infrastructure. In addition, both applications would bring more residents to the region, and therefore, increase costs of county services including potable water, wastewater, storm water, schools, parks, police, fire, and social services.

For the reasons stated above, we urge you to recommend denial of Applications Nos. 7 and 8. The proposals request an expansion of the UDB that is not warranted because there is currently enough countywide supply to meet projected residential capacity beyond the minimum 15 years. The proposed expansion would harm the Everglades ecosystem and Everglades National Park and is inconsistent with the Comprehensive Everglades Restoration Plan. Expanding the UDB would threaten the water supply of residents, exacerbate traffic and increase costs of county infrastructure. Therefore, the applications must be denied.

Thank you,

Stephen Malagodi, President  
Jim Harper, Vice President  
350 South Florida

Charles G. Pattison, FAICP  
Policy Director  
1000 Friends of Florida

Ray Judah  
Board Member  
Caloosahatchee River Citizens Association (CRCA)

Anthony V. Alfieri, Professor and Director  
Catherine Millas Kaiman, Lecturer/Practitioner-in-Residence  
Center for Ethics and Public Service  
University of Miami School of Law

Kathleen E. Aterno  
Florida Director  
Clean Water Action

Elizabeth Fleming  
Senior Florida Representative  
Defenders of Wildlife

Jennifer Rubiello  
State Director  
Environment Florida

Joan Bausch  
Representative to the Everglades Coalition  
Florida Native Plant Society

Manley Fuller  
President  
Florida Wildlife Federation

Alan Farago  
President  
Friends of the Everglades

Diana Umpierre  
Chair, Florida Chapter  
International Dark-Sky Association (IDA)

Mark Songer  
Board President  
Last Stand

Houston Cypress  
Co-founder  
Love the Everglades Movement

Caroline McLaughlin  
Biscayne Program Manager  
National Parks Conservation Association

Mark Ferrulo  
Executive Director  
Progress Florida

Millard McCleary  
Executive Program Director  
Reef Relief

Jonathan Ullman  
South Florida/Everglades Senior Representative  
Sierra Club

Stanley Pannaman  
Conservation Chair  
Sierra Club, Broward Group

Jim Teas  
Chair  
Sierra Club, Miami Group

Matthew Schwartz  
Executive Director  
South Florida Wildlands Association

Laura Reynolds  
Executive Director  
Tropical Audubon Society

Cc: Mayor Carlos A. Gimenez  
Commissioner Barbara J. Jordan  
Commissioner Jean Monestime  
Commissioner Audrey Edmonson  
Commissioner Sally A. Heyman  
Commissioner Bruno A. Barreiro  
Commissioner Rebeca Sosa  
Commissioner Xavier L. Suarez  
Commissioner Daniella Levine Cava  
Commissioner Dennis C. Moss  
Commissioner Javier D. Souto  
Commissioner Juan C. Zapata  
Commissioner José "Pepe" Diaz  
Commissioner Esteban Bovo, Jr.