



# Everglades Coalition

November 1, 2019

Miami-Dade County Planning Advisory Board  
Stephen P. Clark Center  
111 N.W. First Street,  
2nd Floor Commission Chambers,  
Miami, Florida 33128

Re: Evaluation and Appraisal Report

Dear Chairman Rinehart,

On behalf of the 62 member organizations of the Everglades Coalition, we respectfully submit the following comments supporting staff recommendations for updates to the CDMP through the Evaluation Appraisal Report process. As many of our member groups served on the Mayor's Urban Expansion Area Task Force, we support the findings in that final report and reject the changes proposed in the Urban Expansion Area Minority Report. In recent years, the proposition to expand Urban Expansion Area 2 was introduced to our member groups on the Task Force, and they have already objected to this measure.

Miami-Dade's Urban Development Boundary (UDB) is an indispensable planning tool that preserves the East Coast buffer, which consists of farms, wetlands, and open spaces that divide the dense urban corridor of Miami-Dade County from Everglades National Park in the west and Biscayne National Park in the east. Preservation of this area is integral to the success of the Comprehensive Everglades Restoration Plan (CERP). The Comprehensive Development Master Plan (CDMP) carves out several areas called "Urban Expansion Areas" (UEAs); we have requested to remove a portion of these areas to exclude CERP footprints and wetlands. Few changes have occurred in the territorial extent of the UEAs since they were last modified in 1990, despite significant developments such as the establishment of the Comprehensive Everglades Restoration Plan (CERP), the West Wellfield Protection Zone, and a greater understanding of the looming threat of climate change.

The Everglades Coalition has long advocated against expanding the UDB, as doing so would make CERP restoration objectives, as well as flood control, more difficult and costly for Miami-Dade to fulfill. Areas protected by the UDB, many of which are low lying and prone to flooding, encompass wellfield protection areas, as well as areas located over highly transmissive aquifers that are important for drinking water recharge and protection against saltwater intrusion to the aquifer.

1000 Friends of Florida  
Arthur R. Marshall Foundation  
Audubon Florida  
Audubon of Southwest Florida  
Audubon of the Western Everglades  
Audubon Society of the Everglades  
Backcountry Fly Fishers of Naples  
Calusa Waterkeeper  
Cape Coral Friends of Wildlife  
Center for Biological Diversity  
Conservancy of Southwest Florida  
Defenders of Wildlife  
"Ding" Darling Wildlife Society  
Earthjustice  
Environment Florida  
Everglades Foundation  
Everglades Law Center  
Everglades Trust  
Florida Bay Forever  
Florida Conservation Voters Education Fund  
Florida Defenders of the Environment  
Florida Keys Environmental Fund  
Florida Native Plant Society  
Florida Oceanographic Society  
Friends of the Arthur R. Marshall  
Loxahatchee National Wildlife Refuge  
Friends of the Everglades  
Hendry-Glades Audubon Society  
International Dark-Sky Association,  
FL Chapter  
Izaak Walton League of America  
Izaak Walton League Florida Division  
Izaak Walton League Florida Keys Chapter  
Izaak Walton League Mangrove Chapter  
Lake Worth Waterkeeper  
Last Stand  
League of Women Voters of Florida  
Martin County Conservation Alliance  
Miami Pine Rocklands Coalition  
Miami Waterkeeper  
National Audubon Society  
National Parks Conservation Association  
National Wildlife Refuge Association  
Natural Resources Defense Council  
North Carolina Outward Bound School  
Ocean Research & Conservation Association  
Peace River Audubon Society  
Reef Relief  
Sanibel-Captiva Conservation Foundation  
Sierra Club  
Sierra Club Florida Chapter  
Sierra Club Broward Group  
Sierra Club Calusa Group  
Sierra Club Central Florida Group  
Sierra Club Loxahatchee Group  
Sierra Club Miami Group  
Snook and Gamefish Foundation  
South Florida Audubon Society  
Southern Alliance for Clean Energy  
The Florida Wildlife Federation  
The Institute for Regional Conservation  
The National Wildlife Federation  
Theodore Roosevelt Conservation  
Partnership  
Tropical Audubon Society

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The UEA Minority Report, which sets forth a recommendation to expand UEA 2 to encompass an additional 2,000 acres, does not reflect the consensus of the UEA Task Force, county staff recommendations, or the agriculture community. The proposed expansion, which includes a statement of intent to erect additional roadways supporting new development, reflects neither the best interests of the County nor the best interests of its citizens. The Everglades Coalition maintains a strong opposition to any efforts to encroach on the Urban Development Boundary (UDB), as referenced in the Coalition’s initial comments on the [2018 Evaluation and Appraisal Report](#). Compliance with existing Comprehensive Everglades Restoration Plan (CERP) and the protection of agricultural land should be prioritized over expansion of developable land. We should instead turn our attention to infill and transit-oriented development.

**The Coalition reaffirms its recommendations for the Miami-Dade County’s 2018 Evaluation and Appraisal Report (EAR) as follows:**

**1. Redraw UEA boundaries Respecting Existing CDMP Restrictions.**

Lands falling under any of the four conditions that are incompatible with development should be removed from UEA boundaries. These conditions include future wetlands, lands designated for agriculture, hurricane evacuation areas, and lands included in the Comprehensive Everglades Restoration Plan. Wellfield Protection Zones should also be withdrawn (CDMP Policies LU-8G and CON-4A).

A majority of the Task Force voted against the expansion of each of the four UEAs, with majority shares voting to maintain UEA 1 and to contract UEAs 2, 3, and 4. These proposed boundaries are indicative of the desire of the majority to curb excessive expansion and preserve environmental integrity.

**2. Account for Predicted Sea Level Rise.**

The County must take the reality of sea level rise into account when making decisions, prioritizing the protection of lands deemed crucial for aquifer recharge and environmental resilience. Sea level rise may dramatically alter viability of development and compromise county and private investments. The Coalition stands with the 89% of members of the Task Force who agree that the County must take these changes into account when delineating coastal high hazard areas.

Development should not be allowed on land lying in flood zones A, AE, or AH, or any area identified as a “Coastal High Hazard Area”. Failure to account for the compounding impact of sea level rise on storm surge endangers both citizens and property.

**3. Encourage Smart Growth in Policies and Investment.**

Zoning policies should prioritize infill development, walkability, and transit-oriented development. County investment in existing public transit infrastructure and development of public transit as outlined under the SMART plan will eliminate the need for new roadways outside of the UDB.

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**4. Eliminate Requirement for Supply of Developable Land.**

Policy LU-8F requires that the CDMP provide for a 15-year supply of “developable land” to satisfy projected residential demand. This policy encourages sprawl into vulnerable environments and needlessly puts the County’s resources, agriculture, and citizens at risk.

**5. Lengthen Interval between CDMP Amendment Applications.**

Most of the changes to the UDB since its creation have been implemented not because of legitimate need, but because of developers’ persistent attempts to apply for amendment. To demonstrate the County’s commitment to preserving the UDB and investing in the existing urban landscape, the permitted interval between amendment applications should be increased from two to ten years.

**6. Reduce the Territorial Extent of Urban Expansion Areas (UEAs) 2 & 3.**

Development within these areas would be most devastating to the County’s natural resources. These areas include future wetlands, lands designated for agriculture, hurricane evacuation areas, and lands that are part of CERP, as designated in [these graphics](#).

We ask that you reject the Minority Report’s recommendation to drastically expand the UEAs, which would threaten critically important areas with further development. We should instead address housing, population growth, and infrastructure issues through the more sustainable and pragmatic means proposed in the [Miami-Dade County Urban Expansion Area Final Report](#) and by planning staff. Investing in public transit infrastructure and prioritizing infill development can accommodate population growth and needs without implementing policies that will permanently damage areas required for restoration success. Protecting the East Coast buffer is imperative to preserving the long-term resource needs of the County and its citizens, and to ensuring the success of Everglades Restoration.

Sincerely,



Mark Perry  
Co-Chair



Marisa Carrozzo  
Co-Chair

Cc: Honorable Carlos A. Gimenez, Mayor  
Miami-Dade County Commissioners

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