



Everglades Coalition

April 19, 2021

Via e-mail: UEAStudyComments@miamidade.gov

RE: DRAFT UEA STUDY COMMENTS

Dear Assistant Director Bell,

We submit the following comments on behalf of Everglades Coalition, an alliance of 61 local, state and national conservation and environmental organizations dedicated to full restoration of the greater Everglades ecosystem, from the Kissimmee Chain of Lakes into Lake Okeechobee, through the “River of Grass,” out to Florida Bay and Biscayne Bay. The Everglades is widely recognized as one of the world’s most unique and spectacular natural wonders, and Florida has a compelling interest in protecting and restoring the ecosystem due to its tremendous economic and ecological value.

Our comments are in response to the Miami-Dade County Department of Regulatory and Economic Resources Draft Urban Expansion Area (UEA) Report respondent to Comprehensive Development Master Plan (CDMP) Policy LU-8J adopted by the Miami Dade County Board of County Commissioners last year. The policy directs completion of a study addressing the additional areas that may be identified as UEA’s, with a goal of replacing the 1,993 acres that were proposed for removal in Application No. 5 of the Evaluation and Appraisal Report Amendments in the May 2019 CDMP Amendment Cycle, as well as potential additional uses that would be appropriate for the Urban Expansion Areas (UEA), particularly near the Homestead Air Reserve Base (HARB).

It is important to recognize that no developable land would actually be lost from the proposed contractions outlined in the May 2019 CDMP Amendment Cycle, as these areas all fall within the “shall be avoided” categories which the county has identified as unsuitable for development, including the Bird Drive Wetlands, land falling within Comprehensive Everglades Restoration Plan (CERP) boundaries, land within the Homestead Air Reserve Base accident zone, and land falling within the Coastal High Hazard Area.

The report recommends that no additional UEA’s be designated at this time, as there is sufficient residential and industrial development capacity within the UDB to accommodate projected population growth beyond 2040, far beyond the county’s short and long-term planning horizons. The report goes on to note that even with the exclusion of non-developable land as recommended under Application 5, there are approximately 2,000 acres within the remaining UEAs 1-4 that may be suitable for industrial and residential development. **We fully support the recommendations of this study.**

However, the study considers two study areas, area 1a in the Northern Lake Belt, and area 3a in the Redland Protection Area. There is no need at this time to expand the UDB or add additional land into the UEA footprint, but the following comments address the study areas:

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4222 22nd Ave S #530218, Saint Petersburg, FL 3374

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1000 Friends of Florida
Angler Action Foundation
Audubon Florida
Audubon of Southwest Florida
Audubon Western Everglades
Audubon 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
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

Study Area (1a) Northern Lake Belt

Study Area 1a should not be considered at all for designation as a UEA Study Area. 1a is located south of NW 170th Street, adjacent to land designated for CERP purposes. The area is bounded by CERP project areas (Specifically the CERP North Lake Belt project area) and are wetlands of regional significance, and both present and future wetlands are planned here.

The North Lake Belt Storage Area project—an in-ground 90,000 acre-foot capacity storage reservoir made up of canals, pumps, and water control structures designed to transport water for restoring southern Biscayne Bay, northeast Florida Bay, and the adjacent wetlands. The project is scheduled for completion in 2035 and is sponsored by the U.S. Army Corps of Engineers (USACE) and the South Florida Water Management District (SFWMD). In 2020, the USACE began the Project Implementation Report process as part of the Biscayne Bay and Southeastern Everglades Ecosystem Restoration (BBSEER) project of CERP and will be focusing specifically on the water delivery potential from this area to Biscayne Bay and Taylor Slough.

The success of CERP projects delivering water to Biscayne Bay has never been more critical. In August of 2020, Biscayne Bay suffered a major fish-kill event¹. The recurrence of a separate fish kill event in early October has lent ever more credence to concerns that events of this type may become recurrent unless distributed freshwater inputs can be increased and nutrient inputs into the system reduced dramatically². The Bay currently stands at the virtual brink of collapse as a result of eutrophication and looming seagrass die-offs.

The Urban Development Boundary Is Critical to Protecting Restoration Investments

The UDB was incorporated into the CDMP Land Use Plan map in 1983 out of specific recognition of the fact that land falling on the county periphery is generally unsuited to new development and contains valuable natural and agricultural resources.

The major objectives of the UDB are as follows:

1. Protect agriculture as an economically viable industry
2. Protect environmental resources, wellfields (drinking water supply), and wetlands
3. Protect areas designated for limestone and mineral extraction
4. Work in conjunction with other CDMP growth policies to conserve natural resources and prevent sprawl development
 - a. Promote infill and urban center development
5. Facilitate efficient delivery of public services and infrastructure

Miami-Dade County faces unique challenges in managing its urban growth. The narrow strip of elevated land which runs through the center of the county is bounded by low lying, flood prone land which provide the basis of our agricultural economy and buffers two national parks, the Everglades and Biscayne Bay, areas that are of significant importance to the South Florida community and are afforded exclusive protections accordingly.

¹ Thousands of fish turn up dead in Biscayne Bay. FWC will test water for algae blooms. Adriana Brasileiro. 08/11/2016. Miami Herald.

² Dead fish have been reported northern Biscayne Bay. Miami Waterkeeper is investigating, KARINA ELWOOD, 10/03/2020, Miami Herald

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Both the study areas investigated in the report contain a mix of the assets which county planners intended to preserve or avoid development outside the UDB, including valuable agricultural land, native habitat, and safety considerations. If UEA expansion was approved, the newly-proposed UEAs would conflict with ongoing projects for the Comprehensive Everglades Restoration Plan (CERP) and would lead to further degradation and loss of farmlands and wetlands in unincorporated Miami-Dade County. Wetland systems serve numerous essential functions, including filtration and purification of surface and groundwater, direct recharging of water to the Biscayne Aquifer, providing habitat for wildlife, and natural attenuation of flood impacts.

Everglades and the Economy

Tens of thousands of jobs are supported by a healthy Everglades in Florida's multibillion-dollar tourism, boating, real estate, recreational and commercial fishing industries:

- Nearly eight million people –about one-third of Florida's population– depend on the Everglades for their daily water supply.
- 1.6 million Florida jobs depend on tourism.
- 114,898 jobs supported by the recreational saltwater fishing industry, and contributed \$8 billion to the state's economy in 2014.2
- 14,000 jobs supported by Florida's freshwater fisheries, contributed an additional \$1.7 billion economic impact in 2014.
- 86,000 jobs supported by the commercial seafood industry in 2017. Florida is second in the nation when it comes to highest sales, income and value-added impacts with \$19.6 billion in sales impacts.
- In 2017, U.S. fisheries supported 1.74 million jobs and contributed \$244 billion in sales, with 40% of all recreational fishing trips taken in Florida.
- Florida's waterways have been impacted by recurrent harmful algal blooms and seagrass die offs that have damaged local economies and businesses, harmed wildlife, and threatened human health and safety.

For the reasons stated above, we recommend that the county retract the 1,993 acres proposed in Application 5 but not expand the UEA's at this time. There is no need to expand the UDB at all to meet projected development demands over the next 20 years.

We ask instead that the county continue to study area 3a, although area 1a should be discounted entirely due to its proximity to important CERP projects and wetlands. Area 1a's proximity to the transit corridor makes it arguably better suited for development than other lands designated as UEAs that are in close proximity to the Everglades. As such, this area should be considered as an option before any other UEA is added to the UDB.

Sincerely,



Mark Perry, Co-Chair



Marisa Carrozzo, Co-Chair

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CC:

Mayor Daniella Levine Cava

mayor@miamidade.gov

Lourdes Gomez

Director, Department of Regulatory and Economic Resources

lourdes.gomez@miamidade.gov

Jerry Bell

Assistant Director of Planning, DRER

jerry.bell@miamidade.gov

Commissioner Oliver G. Gilbert, III

district1@miamidade.gov

Commissioner Jean Monestime

district2@miamidade.gov

Commissioner Keon Hardemon

district3@miamidade.gov

Commissioner Sally A. Heyman

district4@miamidade.gov

Commissioner Eileen Higgins

district5@miamidade.gov

Commissioner Rebeca Sosa

district6@miamidade.gov

Commissioner Raquel A. Regalado

district7@miamidade.gov

Commissioner Danielle Cohen Higgins

district8@miamidade.gov

Commissioner Kionne L. McGhee

district9@miamidade.gov

Commissioner Javier D. Souto

district10@miamidade.gov

Commissioner Joe A. Martinez

district11@miamidade.gov

Commissioner Jose “Pepe” Diaz

district12@miamidade.gov

Commissioner René Garcia

district13@miamidade.gov

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