



Everglades Coalition

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
Bullsugar
Caloosahatchee River Citizens Association/
Riverwatch
Center for Biological Diversity
Clean Water Action
Conservancy of Southwest Florida
Defenders of Wildlife
"Ding" Darling Wildlife Society
Earthjustice
Environment Florida
Everglades Foundation
Everglades Law Center
Everglades Trust
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
Last Stand
League of Women Voters of Florida
Loxahatchee River Coalition
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
Reef Relief
Sanibel-Captiva Conservation Foundation
Save It Now, Glades!
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
The Urban Environment League of

November 13, 2017

Jerry Bell, Director
Miami Dade County Planning Division
111 NW 1st Street, 12th Floor
Miami, FL 33128

Re: 2018 Evaluation and Appraisal Report Comments

Dear Director Bell,

On behalf of the 62 member organizations of the Everglades Coalition committed to the protection and restoration of America's Everglades, we respectfully submit the following comments and recommendations for Miami-Dade County's 2018 Evaluation and Appraisal Report (EAR).

Miami Dade County's Urban Development Boundary (UDB) is a crucial tool for the preservation of the "greenbelt" a buffer of farms, wetlands and open spaces which separates the dense urban corridor of Miami-Dade County from Everglades National Park in the west and Biscayne National Park in the east. This tool is enshrined within the county's Comprehensive Development Master Plan (CDMP). The CDMP also contains several areas referred to as "Urban Expansion Areas" (UEAs). These are areas into which the county may choose to expand the UDB at some point between 2020 and 2030. These UEAs were first drawn into the county CDMP in 1983 and were modified in 1990. Since 1990 little change has occurred in the territorial extent of these UEAs, in spite of major changes such as the establishment of the Comprehensive Everglades Restoration Plan (CERP) and the West Wellfield Protection Zone, as well as the development of greater understanding of both the looming impacts of climate change and the resource-critical nature of the land within these UEAs.

In our review of the current CDMP we see conflicts between its protective components and the location of proposed UEAs. Specifically, the County's obligation under Land Use Element code LU-8F to maintain a 15 year supply of "developable land" for residential development come into conflict with the desire to maintain the UDB and respect the other requirements stated within the CDMP, such as: wellfield protection [CDMP Policies LU-8G and CON-4]; and protection of sensitive environmental lands and wetlands, especially those adjacent to the CERP project areas [CDMP Policies LU-8G, CON-7C and CON-7J]. Therefore, we recommend a reduction in / elimination of the UEAs that conflict with these policies.

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The Everglades Coalition has long maintained that the Urban Development Boundary should not be expanded, as doing so undermines the accomplishment of CERP objectives. In addition, many of the areas protected by the UDB are in wellfield protection areas, are above highly transmissive aquifers, and are very low lying and flood prone. Development in these areas would exacerbate the job of our agency restoration partners, the South Florida Water Management District (SFWMD) and US Army Corps of Engineers (USACE).

On behalf of the Everglades Coalition, we make several recommendations to be considered in the revision of the Comprehensive Development Master Plan under the 2018 EAR process:

1. **Redraw the UEA Boundaries Respecting Existing CDMP Restrictions.** The County's existing policies restrict development in certain areas, and if respected, would require the redrawing of UEA boundaries. The specific policies and their restrictions follow:
 - Remove lands falling under any of the four conditions designated as incompatible with development under policy LU-8G, which include:
 - future wetlands
 - lands designated for agriculture
 - hurricane evacuation areas
 - lands that are part of the Comprehensive Everglades Restoration Plan (CERP)
 - Remove lands designated as Wellfield Protection Zones (CDMP Policies LU-8G and CON-4A)
2. **Take Sea Level Rise into Consideration.** The County must take the reality of sea level rise into account when making decisions, and operate in a manner that minimizes development in low-lying areas while prioritizing the protection of lands deemed crucial for aquifer recharge and environmental resilience. 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".
3. **Encourage Smart Growth in Policies and Investment.** Zoning policies should encourage infill development, walkability, and transit oriented development. County investment in existing public transit infrastructure and the development of a robust public transit system as outlined under the SMART plan will eliminate the need for new roadways outside of the Urban Development Boundary.
4. **Eliminate Requirement for Supply of Developable Land.** Policy LU-8F requires that the CDMP contain a 15 year supply of "developable land" to satisfy projected residential demand. This policy encourages sprawl into low-lying environmentally sensitive and flood prone areas and puts the County's natural resources, agriculture and citizens at risk.
5. **Lengthen Interval between CDMP Amendment Applications.** The majority of changes to the UDB since its creation have not come as a result of assessed need on the part of the County staff, but rather through the persistent applications for amendment put forth by individual development-seeking landowners. To demonstrate the county's intent to maintain the UDB and encourage density and investment in the existing urban landscape, we recommend that the interval in which these CDMP amendment applications can be heard be increased from two to ten years.

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6. **Reduce the Territorial Extent of Urban Expansion Areas (UEAs) 2 & 3.** Development within Urban Expansion Areas 2 and 3 would be most destructive to the County's natural resource base. As can be seen in Figure 1, these areas include (1) future wetlands (2) lands designated for agriculture, (3) hurricane evacuation areas, and (4) lands that are part of CERP, making development here in violation of Miami-Dade County's Policy LU-8G. UEA 2 also overlaps essential wellfields which the county must protect if it hopes to maintain an ample and secure water supply. In previous EAR cycles (2010 and 2012), county planning staff had recommended the reduction of these Urban Expansion Areas but no action was taken. We recommend that these recommendations be carried out in this EAR cycle.
- Under the 2012 EAR recommendations, county staff recommended removing 1525 acres from UEA 2, however this action was never taken.
 - Under the 2012 EAR recommendations, county staff recommended that the boundaries of UEA 3 be shrunk considerably.

A more detailed discussion of Urban Expansion Areas 2 & 3 can be found in Appendix A.

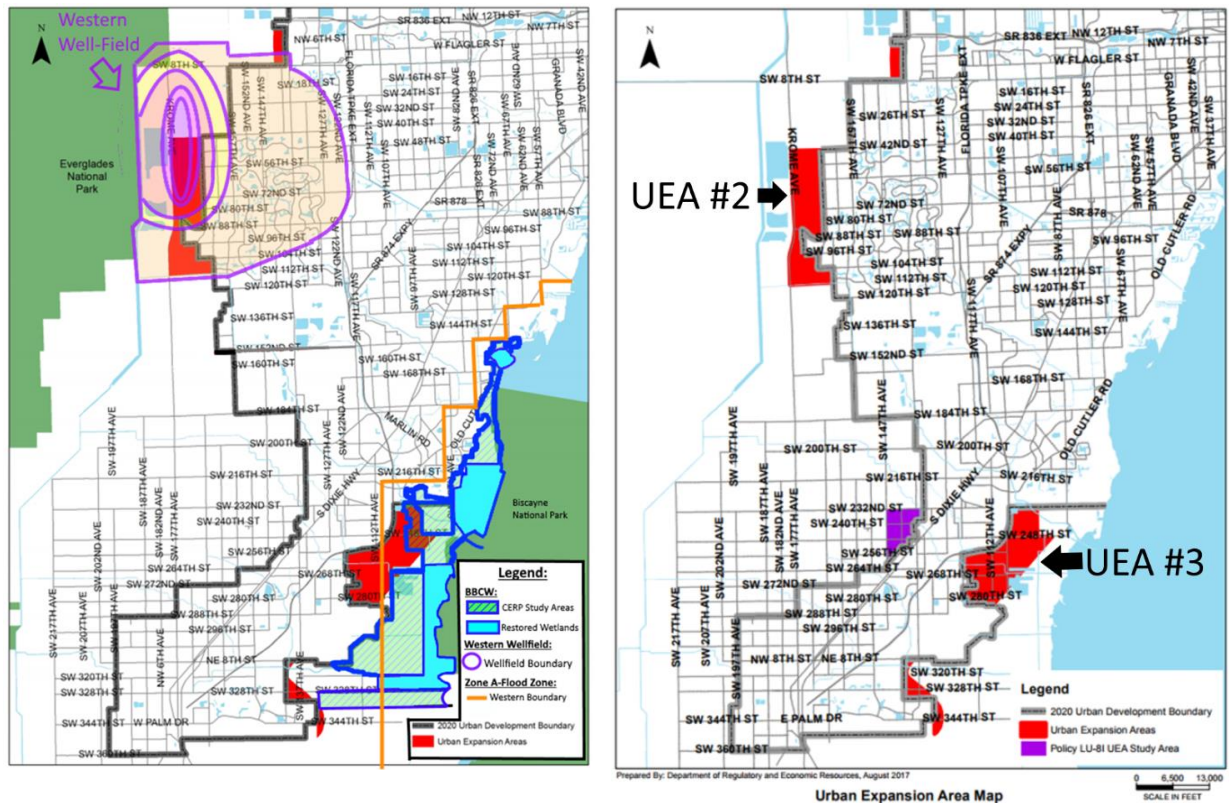


Figure 1. [Left] UEA map with overlays indicating environmental incompatibility [produced by Friends of the Everglades using maps provided by Miami Dade County and US Army Corps of Engineers]
Figure 2. [Right] Urban Expansion Area Map with UEA#2 and UEA#3 indicated

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In conclusion, the Everglades Coalition supports the efforts of the Miami-Dade County Planning Department to channel development away from flood-prone and resource-critical areas outside the UDB and steer investment towards robust public transit infrastructure and transit-oriented infill development. We hope that this letter will help to convince the Miami-Dade County Board of County Commissioners to revise and reduce the boundaries of the Urban Expansion Areas (2&3) that are in conflict with existing CDMP policies, created to protect our finite natural resources and the wildlife they sustain, and further review the policies of the CDMP to ensure they are in line with the County's other sustainable development priorities.

Feel free to contact us with any questions regarding the above-mentioned concerns and recommendations for EAR cycle 2018. We can be reached via email at: info@evergladescoalition.org.

Sincerely,



Mark Perry
Co-Chair



Michael J. Baldwin
Co-Chair

cc: Miami Dade County Mayor Carlos Gimenez
Kimberly Brown, MDC Planning Division
Chairman Esteban Bovo and Board of County Commissioners
Urban Expansion Area Task Force Members

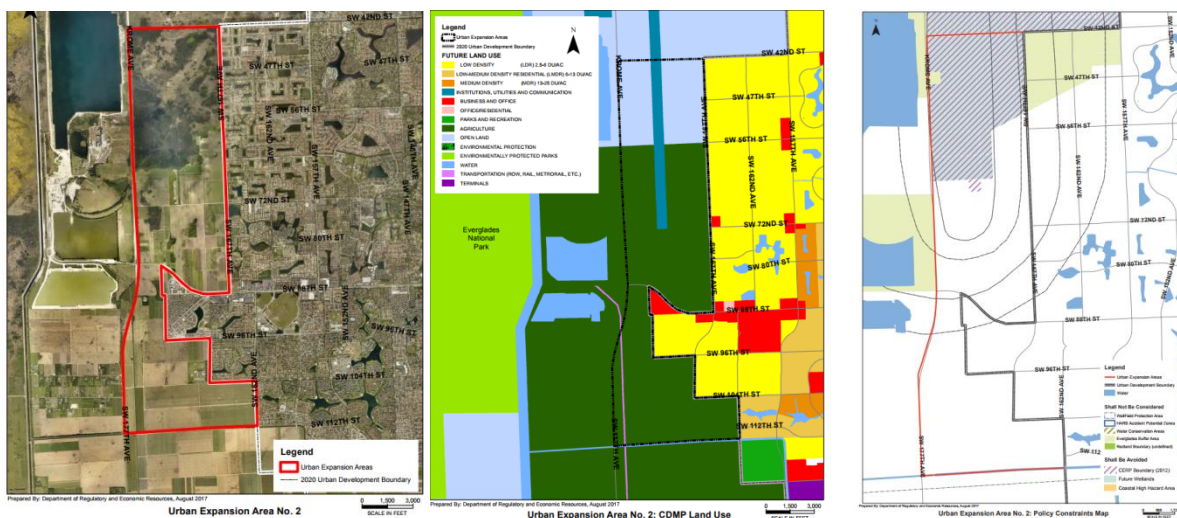
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Appendix A: Additional Background and Details on UEAs 2 & 3

Urban Expansion Area Number 2

The boundaries of UEA number 2 (also referenced as parcel 294) overlap with numerous designations which make it incompatible for development, including future wetlands (development over which should be avoided under policy LU-8G, low lying flood risk zones, agricultural lands, and lands adjacent to CERP projects (SFWMD has recognized the area as an east coast buffer). However, the most egregious element of UEA 2's placement comes from the fact that it completely overlaps the Western Wellfield, including the wellfield's zone of greatest transmissivity.

According to DERM staff, of the county's 26 wellfields, the Western and North-Western wellfields are the most pristine and important for the maintenance of Miami Dade's potable water supply and should therefore be subject to the most stringent land use controls. The 2004 study by the USGS provides ample evidence that the travel time for water in this wellfield is immensely shorter than previously modeled indicating an even higher risk of contamination by harmful pollutants than the county has previously recognized. Areas recognized as having a transportation time of ten days may in fact have transportation time as low as several hours. This should be a major concern to any resident who values the health and well-being of Miami Dade county's citizens.



(Figure A1. [Left] UEA#2)

(Figure A2. [Center] CDMP Land uses in UEA#2)

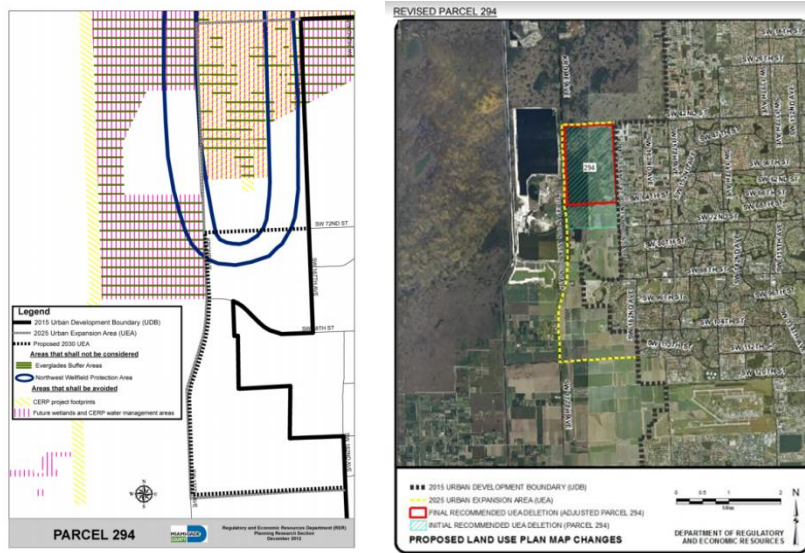
(Figure A3. [Right] Policy constraints and incompatible overlays in UEA#2)

Development over the Western Wellfield would jeopardize the County's drinking water supply by reducing aquifer recharge and increasing risk of pollutants entering the potable aquifer. Freshwater is a crucial resource to preserve into the future, especially as rising population and the advance of sea level rise threatens to apply ever greater pressure upon our freshwater resources. As such, development in this area is not a sensible option. Instead we must prioritize enough water resources so we can provide adequate amounts to our estuaries such as Biscayne and Florida Bay through restoration efforts. In additional we must reduce the drawdown on our groundwater resources so as to protect against further saltwater intrusion especially during the dry season.

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This area constitutes an important buffer zone between urbanized Miami Dade County and the Everglades. The South Florida Water Management district has recognized the importance of this area as a buffer zone separating its projects from incompatible urban development. Furthermore, the parcel contains a great deal of overlap with land designated as “future wetlands” under the Miami-Dade County Land Use Element.

Under the 2010 EAR, county staff recommended removing 1525 acres from UEA 2, however this action was never taken. Despite the fact that the numerous environmental and resource critical considerations of this land should completely disqualify the entirety of this parcel from designation as UEA, even the minimal changes urged by county staff were not adopted. We strongly urge that this long overdue action be taken in this EAR cycle.



(Figure A4. [Left] 2012 EAR staff recommendations showing incompatible overlays for UEA#2)
(Figure A5. [Right] 2012 EAR staff recommendations for redrawing parcel 294 (UEA#2))

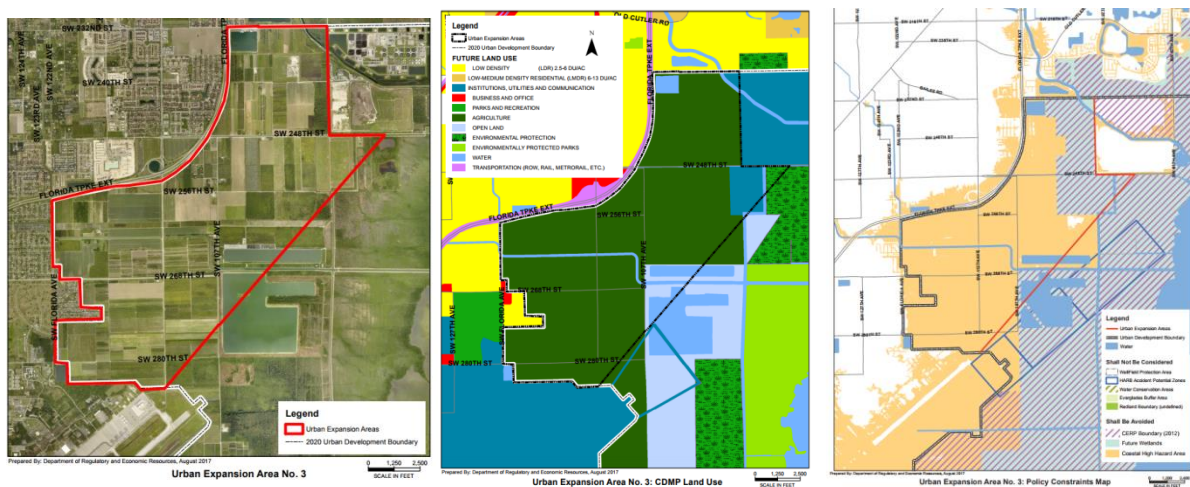
Urban Expansion Area Number 3

UEA number 3 (also referenced as parcel 292) overlaps with several designations which should disqualify it from consideration as a viable area for urban expansion, including all four of the variables addressed under policy LU-8G. The boundaries of UEA include highly flood prone areas of three feet above sea level and below, a significant portion of it falling into Hurricane Evacuation Zone A. It also overlaps with land that is being considered for wetland restoration under phase II of the CERP Biscayne Bay Coastal Wetlands project, lands adjacent to restored wetlands, the potential accident zone for the Homestead Air Reserve Base (HARB) and active agricultural land.

Beyond lending a tacit endorsement to risky and resource-depleting development in this region, the UEA designation for this region presents a tangible impediment to the Everglades restoration process. The Biscayne Bay Coastal Wetlands project is a key component of Everglades restoration meant to restore historic freshwater flow to Biscayne Bay and the wetlands which fringe its shores. Successful implementation of this project will result in stronger and more productive fish nurseries,

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large-scale wetland and marine habitat restoration, and enhanced resilience to the impacts of sea level rise. In order to achieve the maximum possible ecosystem benefit, the BBCW spreader canals should extend as far west as possible. Unfortunately, the UEA designation applied to much of the land considered for purchase and incorporation into the project has markedly driven up prices and diminished the supply of willing sellers, thus hampers the project's ability to move forward into "phase two" which requires the acquisition of privately held land. Furthermore, the spread of high density development to land directly adjacent to these restored wetlands would prove ecologically deleterious and incompatible with the goals of Everglades restoration. Policy CON-7J of the CDMF 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. Thus, this parcel violates two separate policies simultaneously and should be reconsidered as a location for potential urban expansion.



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