

Richard Grosso, Esq.
Richard Grosso, P.A.
6919 W. Broward Blvd.
Plantation, FL 33317
Mailbox 142
grosso.richard@yahoo.com
954-801-5662

Via email to: district12@miamidade.gov

January 15, 2021

Jose "Pepe" Diaz
Chairman
Miami Dade County Commission

Re: 1/20/21 Agenda Item 5H

Dear Chairman Diaz,

I write on behalf of County residents Steven Green, Diane Lockwood, Martin Motes, and Friends of the Everglades. Friends of the Everglades has more than 6,000 supporters across the Greater Everglades region, many of whom, including Mr. Green, Ms. Lockwood, and Mr. Motes, live in Miami-Dade County. We respectfully oppose the changes to the County Code's Urban Development Boundary (UDB) procedures that would be enacted by proposed resolution, as they would repeal a central feature of the County's UDB protections.

Repealing the systematic approach to UDB amendments that has existed for years would greatly harm the comprehensive part of comprehensive planning in Miami-Dade County. The UDB is the cornerstone of the County's land use planning approach that is so necessary to protect its fragile and increasingly scarce farmland, Biscayne Bay and Everglades national parks and ecosystems. Considering UDB amendment applications on a consistent schedule allows for a holistic approach to planning and reflects the fact that such amendments should be rarely granted.

To change this long-standing approach and allowing anyone at any time to request an expedited UDB amendment will create a scattershot situation where the Commission does not have a sense of the entire picture of how cumulative impact of that and other changes to the CDMP and land use pattern. The current time limits on UDB applications are among the features that have been cited as evidence of the strength of the UDB. They offer stability and certainty to all involved. To revisit the County's most important, critical, and impactful land use planning policy randomly undermines the public's interest. The current proposal would weaken the UDB mechanism and process that is the central feature of the CDMP.

The obvious question is why make this change now? The sea level rise, Everglades Restoration, Biscayne Bay crisis and continued loss of farmland currently facing the County require, if anything, greater effort to maintain the UDB. The need to “allow greater flexibility” and allow for “expedited amendments” to the UDB is not at all apparent. It is hard to imagine any kind of emergency need to move the UDB. It would be important for the public to hear a clear explanation of the need to allow for this. Public awareness of and input to an expedited UDB amendment is a major feature of the current limitations that would be severely weakened by this proposal. With at least one UDB application currently in process and the County negotiating with the Air Force over potential new uses at the Homestead Air Reserve Base, we are very concerned about the purpose and potential impact this proposed change to County law.

Relative to the proposal to eliminate the existing limitation on filing UDB amendments for applications that seek to redesignate a property from one non-urban classification, such as, Agriculture, to another non-urban classification, such as Environmental Protection or Open Land”, is also not as benign as it may appear. Given the scarcity and importance of these lands, allowing the conversion of Environmental Protection Land to a less protective category is a major change.

We urge the Commission to decline to amend County law as proposed by this resolution. Thank you for your consideration.



Richard Grosso

Cc: All members, Miami-Dade County Commission (via email)
Alan Farago, Friends of the Everglades
Eve Samples, Friends of the Everglades
Steven Green
Diane Lockwood
Martin Motes