

Feb. 19, 2021

**Via Electronic Mail:** [robert.moriarty.3@us.af.mil](mailto:robert.moriarty.3@us.af.mil)

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**Re: Homestead Air Reserve Base Proposed Joint Use Agreement**

Dear Deputy Assistant Secretary Moriarty,

Friends of the Everglades, founded in 1969 by Marjory Stoneman Douglas, together with the undersigned coalition of organizations, write to urge the U.S. Air Force to reject Miami-Dade County's overtures to enter into a Joint Use Agreement allowing the County to conduct aviation operations at the Homestead Air Reserve Base.

Environmental advocacy groups, including the undersigned, strongly opposed the County's initial efforts more than 20 years ago to engage in substantial aviation operations at the site. We have been involved closely in efforts to protect and restore the sensitive ecosystems near the base and have watched with concern the County's recent efforts to use the HARB facility for industrial purposes. It is clear to us that opening up HARB to the County is likely to lead to the kinds of intensive uses, including commercial cargo operations, that the Air Force wisely prohibited decades ago. We ask the Air Force to reject the County's current request to jointly use the aviation facilities at HARB and affirm its prior decision to prohibit any airport uses by the County.

In 1992, Hurricane Andrew caused significant damage to Homestead Air Force Base facilities and federal authorities recommend that the base be closed. During the subsequent military base closure and reuse process, Miami-Dade County requested the conveyance of the base for development of a commercial airport. Several United States Senators and members of Congress expressed great concern about the impacts of the County's plans on the federal ecosystem restoration objectives in the region. Monroe County (the Florida Keys) and various affected municipalities also objected to the airport.

More than 50 national, state, and local environmental organizations, and over 40 homeowners' associations near the airbase, opposed the commercial airport proposal. The issue generated significant media coverage, both nationally and within Florida. Editorial boards that opposed siting a commercial airport at the former air base include the New York Times, St.

Petersburg Times, Palm Beach Post, Miami Herald, Sun Sentinel, Naples Daily News, Tampa Tribune, and Miami New Times.

The concerns raised by the County's initial efforts to bring civilian aviation operations to the site remain just as relevant to the current proposal:

- **Natural resources:** The proposed airport's close proximity to Biscayne and Everglades National Parks and the Florida Keys National Marine Sanctuary is a threat to some of America's most threatened natural resources, including fragile coral reefs, vibrant fisheries and critical habitats for endangered species, which attract several million national and international visitors annually and otherwise serve as the foundation for billion-dollar tourism and fishery industries. This region is subject to the multibillion-dollar Comprehensive Everglades Restoration Plan. Congress, in the Water Resources Development Act of 2000, stated that because of the "sensitive environmental location" and the "vital national mission to restore and preserve" the South Florida ecosystem, redevelopment "should be consistent with restoration goals."
- **Noise and air pollution:** The proposed airport would have compromised the visitor (and native wildlife) experience at two national parks, and other state and county-maintained preserve areas. The operation of frequent airplane departures and arrivals is flatly incompatible with the peace and serenity of the wilderness experience that is a prime objective of the national park system. Air pollution was, and remains, a major concern.
- **Water threats:** Stormwater management at the site is extraordinarily challenging because of a groundwater table just beneath the surface, high rainfall (approximately 60 inches a year) that is frequently generated during extreme storm events, a geology of highly-transmissive karst limestone, and the poor absorption qualities of this limestone system. Immediately downstream of the Base are mangrove forests, wetlands and near-shore seagrass that are highly sensitive to changes in surface water flow and quality, such as pulse flows that disturb salinity regimes. Flows from the Base and surrounding secondary development would also affect waters further out in Biscayne Bay. These waters are sensitive to even minor increases in nitrogen and nutrient loading. The current ecological crisis in Biscayne Bay has highlighted the problems created by stormwater runoff into the Bay.
- **Agricultural resources:** The site is surrounded by scarce agricultural land, wetlands and critical wildlife habitat, which federal, state and local law seek to protect from urban uses. The introduction of civilian aviation facilities at this location threatens the agricultural land and wildlife habitat surrounding the base.

Due to these concerns, Everglades advocates embarked on a major campaign to oppose the County's plans two decades ago, and several groups engaged in successful litigation to overturn County actions. In December 1997, the Air Force stood up for the federal interests in the region and determined that the widespread objections and concerns about the impacts of allowing the County to operate civilian airport operations required a Supplemental

Environmental Impact Statement (SEIS). The three cooperating federal agencies in the SEIS process, the National Park Service, the U.S. Fish and Wildlife Service, and the U.S. Environmental Protection Agency (EPA), opposed the commercial airport and supported a mixed-use development alternative. The National Marine Fisheries Service, the South Florida Water Management District, and Florida's Department of Environmental Protection also objected to the airport project because of its potential environmental impacts.

In the resulting January 15, 2001 "Second Supplemental Record of Decision – Disposal of Portions of the Former Homestead Air Force Base, Florida," the Air Force wisely decided that "the [HARB] surplus property should not be conveyed for airport purposes" and that "[t]he runway and taxiways will be retained by the Air Force." (ROD, p. 5)

The Record of Decision explained that:

- Base redevelopment involves "special circumstances" as a result of being "proximate to and located between two national parks." (ROD, p. 6)
- "The parks are under assault from urbanization and other pressures." (ROD, p. 6)
- "There is a huge national and state investment being made in protecting and restoring the south Florida ecosystem." (ROD, pp. 6-7)
- "Given [that reasonable alternatives for economic development exist in the form of mixed-use development] the Air Force will not allow the environmental impacts of a commercial airport in this unique location between two national parks...." (ROD, p. 7)
- "...the development of a commercial airport ... in such close proximity to Biscayne and Everglades National Parks, when development alternatives with lesser impacts are available, poses unacceptable risks to these natural resources." (ROD, p. 7)
- "...a commercial airport would not be consistent with the purposes of the Comprehensive Everglades Restoration Plan, authorized by P.L. 106-541."<sup>1</sup>
- It will work in consultation with other interested federal agencies in order to ensure redevelopment is consistent with the SEIS and applicable federal laws. (ROD at 8)

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<sup>1</sup> A 2000 "Sense of Congress" concluded that "development at the Homestead site could potentially cause significant air, water, and noise pollution and result in the degradation of adjacent national parks and other protected Federal resources."

- “Neither land banking nor commercial airport development nor use to support commercial airport development will be permitted.” (ROD at 8)

The ROD went on to advise the County to include in its plans for a mixed use development on the lands the Air Force agreed to convey: “measures to control secondary development to mitigate the effects of base redevelopment and thereby ensure protection of the nearby national parks. Such measures could include a program for the acquisition of lands and interests in lands to serve as a buffer between the Homestead property and Biscayne National Park. . . . A buffer west of Biscayne National Park would promote the projects and initiatives of ecosystem restoration in south Florida.” (ROD, p. 10) The ROD specifically directed the County to consider zoning and structural protective measures, and increasing the two-thirds vote requirement for moving the County’s Urban Development Boundary to three-fourths of the full membership of the BOCC. (ROD, p. 10)

The Air Force then made an Economic Development Conveyance to the County of approximately 604 acres of former HARB property “for mixed use development.”

The Air Force knew then that any potential redevelopment posed significant threats to the surrounding ecosystem and unique communities. The need for additional protections against such impacts that the Air Force wisely suggested then are only more important today, when allowing the County to access HARB for aviation uses would require purchasing and paving farmland and wetlands to facilitate County access to the airfield and a connecting taxiway. These impacts were not authorized by the 2001 ROD.

But, as we write, the County has not taken the measures urged by the Air Force to protect the lands surrounding HARB. Just last month, in fact, the County took the opposite step; liberalizing the frequency with which it will consider amendments to its urban boundary. The County has not implemented a plan for the mixed use development contemplated by the ROD and has not abandoned its desires and efforts to make a more intensive aviation–related use of the HARB property than instructed by the ROD. For example, the County sought approval to use HARB for a Paris-style Air Show. This request was wisely rejected by the Air Force in a Dec. 15, 2011 letter stating that it “cannot support this request” and cited among many reasons “ethical and legal obligations and considerations.”

Neither has the County abandoned its efforts to use the site for cargo operations. County records reveal that County Aviation Department staff have continued to explore the use of the site for cargo operations. **At the very October 6, 2020, public hearing at which the Miami-Dade County Commission approved a resolution directing its staff to negotiate a Joint Use Agreement with the Air Force for “general aviation operations and services only,” several County Commissioners made clear their intent to ultimately use the facilities for cargo, and some County staff expressed the view that the 2001 Record of Decision allows cargo operations.**

These statements and actions do not occur in a vacuum. The County’s recent conveyance of a 77-acre parcel to Amazon, Inc. for a planned 1,000,000 ft.<sup>2</sup> warehouse facility and a 49-acre site for a FedEx distribution facility — on lands conveyed by the Air Force to the County —

support a conclusion that a Joint Use Agreement for “general aviation” will ultimately lead to cargo operations.

We reiterate, however, that even a general aviation airport is inconsistent with the determination in the 2001 ROD that the property should not be conveyed for airport purposes. Our understanding of the County’s intentions relative to general aviation only compounds the extent to which the current proposal violates the intent and terms of the Air Force’s prior decision.

While some local interests appear to see the Air Base as an opportunity for private economic gain, we would emphasize that Everglades and Biscayne National Parks provide significant economic benefits to Florida and Miami-Dade County from tourism and recreation.

Everglades National Park receives over 1 million visitors per year and is internationally recognized as both a World Heritage Site and Biosphere Reserve. Biscayne Bay receives nearly 500,000 annual visitors and is an important recreational resource for the surrounding greater Miami urban area. Public opinion in south Florida and throughout the state has consistently been opposed to a civilian airport next to Biscayne National Park and near the Everglades. It is time to move on, and provide jobs for the region through a mixed use development which will enhance and not harm threatened environmental resources.

The undersigned organizations continue to see Miami-Dade County’s efforts to secure the use of federal lands at HARB for aviation-related economic development as a significant threat to restoration of Biscayne Bay and the Everglades. We stand firmly opposed to this backsliding and urge the Air Force to uphold its 2001 Record of Decision, thereby standing up for the federal interests and rejecting the County’s current, continued and future efforts to compromise the protection, restoration and enjoyment of these irreplaceable natural assets.

Very truly yours,

Audubon Florida

Bonefish & Tarpon Trust

The Everglades Foundation

Everglades Protection Alliance

Florida Bay Forever

Friends of the Everglades

National Parks Conservation Association

Ocean Reef Conservation Association

Tropical Audubon

CC:

U.S. Sen. Marco Rubio

U.S. Sen. Rick Scott

U.S. Rep. Carlos Gimenez

U.S. Rep. Maria Elvira Salazar

U.S. Rep. Mario Diaz-Balart

U.S. Rep. Frederica Wilson

U.S. Rep. Debbie Wasserman Schultz

Miami-Dade County Mayor Daniella Levine Cava

Miami-Dade County Commissioner Danielle Cohen Higgins

Miami-Dade County Commissioner Keon Hardemon