

*Center for Biological Diversity * Earthjustice * Friends of the Everglades
Izaak Walton League of America * National Parks Conservation Association
Natural Resources Defense Council * Sierra Club*

May 5, 2021

Via Electronic Mail

The President
The White House
1600 Pennsylvania Avenue, NW
Washington, DC 20500

Re: Homestead Air Reserve Base Proposed Joint Use Agreement

Dear Mr. President,

Our organizations applaud your administration's elevation of environmental issues to the front of the national agenda and the renewed optimism you have created for our ability to achieve sustainability in the face of the many challenges facing our country and planet. We write to bring to your attention the re-emergence of an issue that threatens to compromise the substantial, long-term and critical federal investment in the restoration and protection of the Greater Everglades ecosystem. Miami-Dade County is requesting a Joint Use Agreement with the US Air Force to use portions of the Homestead Air Reserve Base (HARB) for civilian aviation purposes. **We respectfully ask this Administration to halt the negotiation, which echoes past controversies and undermines efforts to restore the Greater Everglades ecosystem and invest in a climate resilient future.**

During the mid to late 1990s, Miami-Dade County sought the conveyance of HARB for a commercial airport. The Air Force's initial approval, through the Base Realignment and Closure Act, led to years of controversy and ultimately a reversal. The Air Force's 2001 Record of Decision (ROD) - after observing that "[b]y far it has been the most contentious re-use decision the Air Force has faced in more than 30 base closures and re-alignments"¹ - concluded that the "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).

Current military operations at HARB provide important business opportunities and jobs for the local community. However, the current request by Miami-Dade County to introduce commercial aviation to the air base is cause for alarm. We strongly oppose any non-military aviation use by Miami-Dade County.

Recent events make clear that the County remains steadfast in its ambition to ultimately develop commercial airport operations in this unique location sandwiched between two of America's most threatened national parks (Everglades and Biscayne National Parks). County records reveal significant planning and analysis - years after the Air Force stated it would not allow commercial airport development - for potential use of the air base for cargo operations.

¹ Second Supplemental Record of Decision for Disposal of Portions of the Former Homestead Air Force Base, Department of the Air Force, Jan. 15, 2001.

Last fall, when the County Commission directed its staff to pursue joint use of the air base for general aviation, several commissioners made explicit their intent to expand that use to cargo operations.

The HARB site is just two (2) miles from Biscayne National Park, ten (10) miles from Everglades National Park, ten (10) miles from the Florida Keys National Marine Sanctuary, and very near other significant state and local protected areas. These natural areas contain some of America's most threatened natural resources (Everglades National Park is a World Heritage Site and Biosphere Reserve), including fragile coral reefs, vibrant fisheries and critical habitats for endangered species. They attract several million national and international visitors annually and are the foundation for billion-dollar tourism and fishery industries. Protection of the Greater Everglades region is the subject of the multi-billion-dollar Comprehensive Everglades Restoration Plan (CERP) authorized by the Water Resources Development Act of 2000, which is an important example of the nation's capacity to plan, execute and fund the very science-based ecosystem restoration and nature-based infrastructure promoted by your unprecedented and inspiring *American Jobs Plan*.

The sensitivity of this area was the basis for the Air Force's 2001 decision to not allow the County to use the facility for civilian airport operations, which explained:

- This Air 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)
- "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)
- "[T]he Air Force will not allow the environmental impacts of a commercial airport in this unique location between two national parks..." (ROD, p. 7)
- "a commercial airport would not be consistent with" Everglades Restoration.²
- "Neither land banking nor commercial airport development nor use to support commercial airport development will be permitted." (ROD p. 8)

The Air Force then conveyed to the County only a portion of the lands the County had requested on the condition the land be used only for "mixed use development" and the County "control secondary development to mitigate the effects" of that development and "thereby ensure protection of the nearby national parks." (ROD, p. 10).

In the years since, Miami-Dade County has failed to (1) establish mixed-use development on the former Air Force land, and (2) acquire land to serve as a buffer between the land to be developed and Biscayne National Park, and (3) to increase restrictions on urban development in the area, as requested by the Air Force "to control secondary development ... and thereby ensure protection of the nearby national parks." Instead, the County recently loosened its rules for

² A 2000 "Sense of Congress" stated "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."

expansions of its urban boundary, which quickly led a local development consortium with extensive background in construction of aviation-related logistic projects to apply for approval of an 800 acre “distribution and logistics center” close to the air base. **Our concern is that the proposed logistics center, together with a nearby large FedEx site and even larger planned Amazon facility, constitute only the first steps toward an effort to use the base for full commercial activities.**

Several of our organizations have urged the Air Force, in multiple and detailed correspondence, to decline a Joint Use Agreement. Although the Air Force has indicated that any proposed Joint Use Agreement would trigger a full National Environmental Policy Act (NEPA) review process, we believe a far better outcome would be to halt the Joint Use Agreement process now. The record supports such a denial. The agency record compiled two decades ago compellingly showed what has become only more exigent since. Biscayne Bay is experiencing a pollution crisis, and sea level rise and saltwater intrusion into aquifers are a growing problem. Planning for and implementation of the Biscayne Bay wetlands component of the Comprehensive Everglades Restoration Plan is in a race against time as the development proposals we describe above threaten the lands being studied for restoration. Everyone and everything in the vicinity, including children who may be housed at the Homestead Detention Center, those laboring on nearby farms, and the visitors and wildlife within the two national parks, would be exposed to increased noise and pollution impacts.

The Homestead Air Reserve Base site is wholly inappropriate for non-military aviation. We ask the Administration to re-affirm the 2001 Record of Decision and reject Miami-Dade County’s overtures to secure a Joint Use Agreement at the Air Base.

We thank you for your consideration and continued leadership toward a sustainable future.

Most respectfully,

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