

# TROPICAL AUDUBON SOCIETY

SOUTH FLORIDA'S VOICE OF CONSERVATION



May 4, 2022

Board of County Commissioners  
Miami Dade County  
111 NW 1<sup>st</sup> Street, Suite 220. Miami, FL 33128  
Sent via email

**Subject: CDMP20210003 – Application to Amend the Comprehensive Development Master Plan (CDMP) for the “South Dade Logistics and Technology District”**

Dear Commissioners:

Tropical Audubon Society, Friends of the Everglades, Everglades Law Center, Audubon Florida and National Parks Conservation Association appreciate the opportunity to express our concerns and strong opposition regarding the application to expand the Urban Development Boundary (UDB) to create the South Dade Logistics and Technology District (SDLTD), Application CDMP20210003.

In our letter to RER on December 7, 2021, we provided our review of State Agency comments regarding the South Dade Logistics and Technology District (Appendix 1). Additionally, summarized below are the concerns we outlined in a letter to the Board of County Commissioners, also submitted on December 7, 2021 (Appendix 2). Specifically, we highlighted that the agencies contended that the proposed center:

- 1) Is proximate to, and will negatively affect, three important State resources: An Aquatic Preserve, a National Park and Outstanding Florida Waters (OFW).
- 2) Can compromise existing and future Comprehensive Everglades Restoration Projects (CERP) and challenge achieving CERP goals, in particular, Biscayne Bay Coastal Wetlands Phase I (BBCW) and the Biscayne Bay South Eastern Everglades Restoration (BBSEER).
- 3) Would adversely impact wetlands, regional water supplies, flood protection and floodplain management.
- 4) Would accelerate the loss of irreplaceable farmland of statewide importance and deplete the availability of county-designated farmland of unique importance with negative consequences on South Dade’s regional agriculture.
- 5) Is not consistent with county planning regulations, policies and norms and would create a damaging precedent.

We continue to share these concerns and do not believe they have been resolved. We especially emphasize here three areas of particular concern:

**First: The SDLTD proposal lacks detailed analyses and would create unacceptable risks to wetlands, flood protection, floodplain management and our regional water supply**

The SDLTD amendment application is located 1.7 miles from Biscayne Bay, near coastal wetlands and in a Coastal High Hazard area—all areas that are vitally important county resources. The proposed amendment does not adequately address the serious risks to these resources or demonstrate how harmful impacts will be avoided and/or mitigated.

Specifically, the application lacks details on its stormwater management plans and impacts on our regional water supply. In particular, it proposes to replace the locally pumped irrigation water supply with new demands on the regional water supply system without any analysis on water availability, cost or impact on these county services.

The SDLTD is adjacent to Wetlands of Regional Significance and many residential neighborhoods. It would be imprudent, and contrary to state land use planning requirements, to wait to address significant risks regarding impacts on wetlands, flooding, and storm management until the permitting process. The proposal would negatively impact climate change resilience efforts in a State-designated High-hazard zone, inducing local flooding and saltwater intrusion. Given the serious potential impacts on surrounding communities and agricultural lands, these issues need to be addressed upfront. We must be systematic and thoughtful in our approach to protecting our water supplies and reducing flood risks to our community

Lastly, the application is not consistent with recent Board of County Commissioners' decisions to restore and protect Biscayne Bay, including your recent endorsement and approval of the recommendations from the Biscayne Bay Task Force and your longstanding support for the Everglades restoration BBSEER project. Approval of this application would permanently remove one of our last and best chances to restore Biscayne Bay.

**Second: The promised economic benefits of the SDLTD amendment application are not real and the costs are greatly understated.**

The proponents of this proposal promise jobs and economic growth, but are silent on the details supporting their analysis and grand economic projections in the application. The promised economic benefits are greatly exaggerated and the significant environmental harm is substantially underestimated by the applicant. The applicant's economic analysis lacks a complete timeline, does not disclose underlying variables, asserts unqualified use of externalities and lacks price data to support its conclusions. Additionally, the analysis does not balance the promised benefits with the resulting job losses to the region, including farmworkers, processing plants and transportation sector jobs. We fear that the likely economic losses could be greater than the promised benefits.

The proposal includes raising the land significantly, which will certainly cause water level increases in the C-102 Canal and negatively impact the existing residential areas. This will alter the local hydrology in the surrounding area and require significant changes to the regional water management system. As described above, the development will replace a local irrigation system with a demand for municipal water. None of the costs to manage these impacts have been adequately addressed and these costs for new County Services will fall on the shoulders of our county taxpayers.

**Third: The proposal is dramatically inconsistent with the Miami-Dade Comprehensive Development Master Plan (CDMP) and its long-held planning policies**

The Miami Dade County's Regulatory and Economic Resources Department (RER) provided an excellent initial report last summer that was compelling. We believe that the issues identified in that report have not been sufficiently addressed, but we now await the revised RER report.

The CMDP planning process has served the county well for several decades as the most responsible way to balance economic and environmental goals in our county. We have always listened to Miami-Dade County's experts and believe our County is the better for it.

We note that the applicant understands that it has not met the County's planning and zoning policies and is seeking exemption from several very important analyses. Approval of these exceptions would create a precedent that will be very difficult for future Commissioners to ignore, especially for an out-of-cycle application. But even as applied to this single project/property, the size of the project makes waiving the concurrent zoning requirement – which is more important the larger the project - highly inappropriate.

Taken together, these concerns underscore the damage that an approval of this application would create. We are open to discussing any of these points in greater detail and encourage you to review the additional information included in the appendices.

The undersigned organizations strongly recommend that the Board of County Commissioners **deny** the policy exception for concurrent zoning and the application to expand the Urban Development Boundary.

Thank you for your time and consideration,

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cc. Mayor Daniela Levine Cava; Director Lourdes Gomez, RER; Assistant Director of Planning Jerry Bell, RER;  
Director of Policy Sean McCrakine.