Memorandum

MIAMI-DADE COUNTY

Date: May 11, 2021

Agenda Item No. 2(B)(9)
June 15, 2021

To: Honorable Chairman Jose "Pepe" Diaz
and Members, Board of County Commissioners

From: Daniella Levine Cava
Mayor

Daniella Levine Cava

Subject: Transmittal of Final Urban Expansion Area Report (provided pursuant to CDMP Policy LU-8J)

The attached final report is being transmitted to the Board in fulfillment of CDMP Policy LU-8J, adopted by the Board on July 22, 2020. The policy states "by no later than the time to file an application in the May 2021 CDMP Amendment Cycle to amend the Urban Expansion Areas (UEA), Miami-Dade County shall complete a study of (i) additional areas that may be identified as urban expansion areas, with a goal of replacing the 1,993 acres that were proposed for removal in Application No. 5 of the Evaluation and Appraisal Report amendments in the May 2019 CDMP Amendment Cycle, and (ii) potential additional uses that would be appropriate for the urban expansion areas, particularly near the Homestead Air Reserve Base. A draft of this study shall be made available for review by the public by March 15, 2021". As required by Policy LU-8J, a draft version of the study was made available for public review on March 15, 2021. Comments received during the public review period, as contained in Appendix 6 of the report, were considered in the final report.

Pursuant to Section 2-116.1 of the Code, applications to amend the Urban Expansion Area boundaries can only be filed between January and May in odd-numbered years. While the identification of new UEAs does not move the Urban Development Boundary (UDB), it does have implications for future growth. The UEAs represent areas that the County has prioritized for future growth once there is a demonstrated need to move the UDB. The timing and location of those designations signal the County's vision for the future of our community to our constituents and the elected officials that will someday succeed us. The County has committed significant resources to supporting a robust transit system, improving the ecological health of the Everglades and Biscayne Bay, and making the County more resilient to the impacts of coastal storms and climate change. Decisions on how to guide future growth must work in conjunction with these efforts. The focus is not on stifling growth, but rather guiding it in a responsible way.

Among the primary considerations when assessing the need for new Urban Expansion Areas is the development capacity inside the current UDB and UEAs. The UDB and UEAs are tools used to plan for near-term and long-term growth while protecting important resources. The County's near-term planning period, currently 2030, serves as the planning horizon for the UDB and land use patterns and densities expressed on the Land Use Plan map, as well as for near-term facility planning. The long-term planning period, currently 2040, is used principally for identifying areas most appropriate for long-term urban growth, including the UEAs, and facilities with long-term consequences. **The recommendations provided in the**

final report are underpinned by analysis demonstrating that the UDB and UEAs, including proposed contractions, are sufficient to accommodate long-term population growth beyond 2040.

It is important to recognize that almost all areas along the UDB that are outside of current UEAs are constrained in some way. There is no perfect area, and the identification of almost 2,000 acres of new UEA, as directed by Policy LU-8J, requires a balancing of those constraints against the County's future land needs. The final report identifies two Analysis Areas that attempt to best balance those considerations: a ±1,398-acre area located in the Northwest Lake Belt (Analysis Area 1A) and a ±596-acre area located along the South Dade Transitway (Analysis Area 3A). However, analysis showing that the County currently has sufficient countywide supply of residential and non-residential land beyond the long-term planning horizon of 2040 provides an opportunity to thoughtfully time the designation of new UEAs.

Four issues from the public comments received on the draft report warrant additional discussion: 1) the County should first look to areas along the South Dade Transitway when identifying new areas for future growth; 2) there are concerns about whether the designation of a UEA within the North Lake Belt Comprehensive Everglades Restoration Plan (CERP) boundary will hinder restoration efforts; 3) the County should avoid substantial losses of agricultural land; and 4) there are concerns about whether the UDB is affecting housing affordability. These issues are discussed in more detail in the following paragraphs.

As changing conditions have made some areas less suitable for future growth, other areas have been made more suitable for future growth. Such is the case with Analysis Area 3A (±596-acres) located along the South Dade Transitway. The County has made significant efforts to improve transit along the corridor and to support it with appropriate land uses that provide ridership and funding for those improvements. The presence of this high-volume transit service would allow the area to accommodate a significant amount of residential capacity with minimal loss of agricultural land. As depicted on Table 2.1 of the UEA Study, the countywide demand for residential uses is projected to be approximately 10,000 units per year in 2040. It is estimated that Analysis Area 3A has the capacity to support over 17,000 units, which represents over 1.7 years of residential capacity. The area could also support a significant amount of non-residential capacity.

In 2019, the Department of Regulatory and Economic Resources (RER) Planning Division studied a larger 920-acre area that included a portion of Analysis Area 3A for possible designation as a UEA. Concerns raised by the community at that time included impacts to the rural character of the area, loss of agricultural land, traffic congestion, and inadequate infrastructure and services. This UEA Study analyzed a smaller area than what was previously studied in 2019. Based on public comments, this revised area appears to be more palatable. **However, an Urban Expansion Area should not be designated in this area without the concurrent adoption of policies to ensure protection of Natural Forest Communities, appropriate land use transitions to agricultural uses, and additional public outreach to ensure that the concerns of the community are addressed.** It is important to reconcile the policies of the CDMP to recognize the County's efforts to provide

transit-supportive land uses along the South Dade Transitway. To that end, it is recommended that CDMP Policy LU-8G(i)(d), which identifies the area south of SW 184th Street as an area that "shall not be considered" for expansion of the UDB, be amended to exclude areas that are generally located within one half mile of the South Dade Transitway.

The Comprehensive Everglades Restoration Plan (CERP) represents the single greatest opportunity to dramatically improve the ecological health and function of the Everglades and Biscayne Bay, goals that have been prioritized through the CDMP and other policies adopted by the Board. The County must remain steadfast in its support of CERP and the much-needed federal and state funding that it can provide to accomplish these important goals. For Analysis Area 1A, 634 acres out of the 1,398-acre Analysis Area include portions of the North Lake Belt CERP project. Uncertainty about the viability of the North Lake Belt CERP in-ground reservoir project has existed since the time it was authorized and continues today. Deauthorization of the pilot project that was planned to test the viability of in-ground storage in the Lake Belt likely hindered efforts to confirm its viability. The CERP Biscayne Bay and Southeastern Everglades Ecosystem Restoration (BBSEER) project is offering a renewed look at the North Lake Belt project and may offer alternatives to retain its anticipated benefits. Much will be learned over the next few years. If the identified area is found to be infeasible or unnecessary for CERP, it could have potential for future non-residential growth. **To that end, an Urban Expansion Area should not be designated in this area until it can be positively affirmed that the designation would be consistent with CERP goals.** In addition, any future designation of a UEA in this area should include the concurrent adoption of policies to ensure compatibility with nearby rockmining uses and adequate protection of wetland functions.

Minimizing the loss of agricultural land is a key consideration when identifying areas for future growth. Encouraging agriculture as a viable economic use of land is a long-standing principle of the CDMP. Further, CDMP Policy LU-1R states, in part, that Miami-Dade County shall take steps to reserve the amount of land necessary to maintain an economically viable agricultural industry. Decisions on whether the County should strive to maintain agriculture as an $800M+ industry are policy choices. However, depletion of agricultural land below a certain threshold may lead to a loss of the economies of scale enjoyed by the industry and an associated reduction in agricultural support services, including packing houses and agricultural research. It is not easy to determine where that tipping point lies. A 2002 study by County Planning staff analyzed this issue by projecting future land needs for the County's major agricultural products and the anticipated loss of agricultural land due to urbanization. The analysis showed a need for 51,885 acres for agriculture in 2025. It is important to recognize that the analysis is almost twenty years old, and the County would benefit from an update. The 2002 study built on data from a larger analysis conducted by the University of Florida Institute of Food and Agricultural Sciences (UF-IFAS) with financial support from the Florida Department of Agriculture and Consumer Services. The larger study provided important data on agricultural commodity trends that informed the County's report. **It is recommended that a CDMP policy be added directing completion of a study, in partnership with a research institution, that identifies the amount of land needed to maintain an economically viable agricultural industry and the associated challenges with maintaining the necessary acreag**e. The study will

commence upon identification of a funding source, which may include grant funding, if available. This recommendation is reflected in the final report.

Some of the public comments centered on the need to expand single-family residential capacity and replace acreage from the areas of the proposed contractions, particularly south of UEA No. 2. While some areas may be suitable for such uses, it is important to recognize that, in addition to the analysis regarding agricultural lands presented above, other constraints affect the development of additional residential density in this area. Approximately 300 acres in the area is located within the Outer Safety and Runway Protection Zones for Miami Executive Airport. In 2019, the Board adopted airport land use compatibility standards to address airport operational matters, Florida statutory changes, and Federal Aviation Administration guidance. The regulations prohibit new residential construction, educational facilities, hospitals, religious facilities, and other buildings for public assemblage within the Outer Safety Zone and Runway Protection Zone for the County airports. Therefore, these areas would not be eligible for residential density increases.

As depicted on Figure 22 of the report, portions of the area are located within one mile of express bus routes located at SW 104th Street (Killian Kat) and SW 152nd Street (Coral Reef Max), however the area is not served by high capacity transit. Therefore, the remaining area between UEA No. 2 and SW 184th Street would only be expected to support densities that are close to the minimum allowable for UDB expansion applications (10 du/acre). At these densities, 1,000 acres would be depleted to supply one year of residential capacity. Given that the area south of UEA No. 2, particularly north of SW 152nd Street, contains the County's larger agricultural parcels, loss of agricultural land in this area may have detrimental impacts to the diversity of the County's agricultural industry. Identification of new UEAs that would result in the depletion of a significant amount of agricultural land should not occur until additional analysis is obtained on the impact it would have on the agricultural industry through the aforementioned study.

Moving the UDB cannot be our affordable housing strategy. Miami-Dade County, like other major metropolitan areas, has experienced sharp increases in housing costs in recent years, which have only heightened our challenges in addressing housing affordability. However, it is not possible to isolate the Urban Development Boundary as a contributing factor to housing price inflation. Numerous factors affect the cost of housing, including locational factors, neighborhood amenities, construction cost, and influence of foreign markets, among others. Data provided in the report shows that price fluctuations in Miami-Dade County over time were consistent with the average price increases of other large counties in Florida. While those comparison counties have policies that constrain development in certain areas and prioritize development in other areas, none have a growth boundary as restrictive as Miami-Dade County's. This comparison thus supports the conclusion that the UDB does not exert significant inflationary pressure on housing prices.

We want our County to remain welcoming to families of all income levels and should make a concerted effort to maintain diversity within our housing supply. However, low density development beyond our UDB is unsustainable and is not the solution to housing affordability or diversity. As stated in the UEA Study, developing 1,000 acres of land outside

of the UDB at the minimum density of 10 dwelling units per acre would only provide about one year of supply and we would continue to be faced with the same challenge year-after-year. The report recommends increasing the diversity of housing options by focusing on increasing the supply of attached single family housing on smaller lots while maintaining the character of established neighborhoods.

CDMP Policy LU-8J(ii) directs the study to address potential additional uses that would be appropriate for the UEAs, particularly near Homestead Air Reserve Base (HARB). Several recent approvals have already liberalized allowable uses in the agricultural area, including in the current UEAs. For example, in the May 2019 CDMP Amendment Cycle, the Board allowed truck parking in UEA No. 3 and eased limitations on agriculturally supportive uses. In 2020, the Board also authorized rural event venues in the agricultural area. Identifying additional uses that may be allowed without expanding the UDB must be balanced against the future growth potential of the UEAs for urban development. **Given that the UEAs represent areas that have been identified for future urban growth, the types of uses permitted in the UEAs during the interim should not create a conflict with that potential future growth.** Additional uses near HARB must also be carefully analyzed to ensure that they do not negatively impact the future viability of the military installation. The recommendations presented in the final report respond to the directive from the Board while providing for these considerations. These include incorporating criteria to address uses that have a unique need to locate outside of the UDB and to reanalyze, by 2030, the County's truck parking needs.

Finally, contraction of the current UEAs, as proposed in the May 2019 CDMP Amendment Cycle, should proceed regardless of whether new UEAs are designated. The proposed contractions were deferred on July 22, 2020 pending release of this final report. Contraction would provide for internal consistency with other existing CDMP policies that govern UDB expansions. The areas proposed to be removed are identified in CDMP Policy LU-8G as areas that "shall not be considered" for UDB expansions. Although approximately 1,282 acres of the 1,993 acres proposed for removal are in private ownership, the contraction areas are not considered to have future urban growth capacity due to these policy constraints. In addition, the remaining 711 acres is already in public ownership. Removing the 1,993 acres will therefore provide a clearer indication of the areas that are available to support future growth and provide for more logical boundaries for the UEAs.

In addition to the discussion of replacement UEA acreage, the report provides recommendations for additional CDMP policies that should be adopted by the Board in light of the UEA analysis. **The eight final recommendations are summarized below and detailed in Chapter 4 of the report.** Advancement of these recommendations, including contraction of the current UEAs, requires Board sponsorship.

1) Amend CDMP Policy LU-8G(i)(d), which identifies the area south of SW 184th Street as an area that "shall not be considered" for expansion of the UDB, to exclude areas that are generally located within one half mile of the South Dade Transitway. Additionally, any future designation of a UEA in the ±596.5 acres located along the South Dade SMART Plan Corridor ("Analysis Area 3A") should include the concurrent adoption of policies to ensure protection of Natural Forest Communities,

appropriate land use transitions to agricultural land, and additional public outreach to ensure that the concerns of the community are addressed.

2) Any future designation of a UEA in the ±1,398.8 acres located in the North Lake Belt (Analysis Area 1A) should not occur until it can be positively affirmed that the designation would be consistent with Comprehensive Everglades Restoration Plan (CERP) goals. In addition, any future designation of a UEA in this area should include the concurrent adoption of policies to ensure compatibility with nearby rockmining uses and adequate protection of wetland functions.
3) Establish criteria for urban-type uses that have a unique need to locate outside of the Urban Development Boundary.
4) Add a policy to the CDMP to reevaluate truck parking demand by 2030 to determine whether the current land supply is sufficient.
5) Add a policy to the CDMP to identify opportunities to increase the diversity of housing options inside the Urban Development Boundary with particular focus on increasing the supply of attached single family housing while maintaining the character of established neighborhoods.
6) Provide for continued County governance over land that is located outside of the Urban Development Boundary.
7) Define the boundaries of the Redland area for purposes of CDMP Policy LU-8G following consideration of community input.
8) Add a CDMP policy directing completion of a study, in partnership with a research institution, that identifies the amount of land needed to maintain an economically viable agricultural industry and the associated challenges with maintaining the necessary acreage. The study will commence upon identification of a funding source which may include grant funding, if available.

A summary of substantive changes from the draft report (dated March 10, 2021) to the final report is included as an attachment to this memorandum. If you have questions regarding this information, please contact Lourdes Gomez, AICP, Director of Regulatory and Economic Resources at (305)375-2886 or Lourdes.Gomez@miamidade.gov.

Attachment

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Miami-Dade County Urban Expansion Area Study
Summary of Changes from the Draft Report to the Final Report

Date: May 7, 2021

Listed below are substantive changes to the Urban Expansion Area Study from the draft report (dated March 10, 2021) to the final report (dated May 7, 2021). A document depicting all changes is available upon request from the Department of Regulatory and Economic Resources, Planning Division.

1) The Development Capacity Methodology (Appendix 2) was amended to include the methodology for commercial and industrial land capacity.
2) Chapter 3 (Detailed Analysis Areas) was amended to include additional discussion on the likelihood of areas containing archaeological resources.
3) A study completed in 2002 by Miami-Dade County Department of Planning and Zoning titled "Urban and Agricultural Land Use Trends and Projections" was added as Appendix 5 to the report.
4) Comments received during the public comment period (March 15, 2021 through April 19, 2021) were added as Appendix 6 to the report.
5) The Executive Summary was amended to indicate the amount of the proposed UEA contraction area, as presented in the May 2019 CDMP Amendment Cycle, that is in public ownership.
6) "Figure 19: Generalized Commute Patterns" of Chapter 2 was amended to correct the number of commuters depicted on the map. This change did not affect the commute patterns depicted on the map.
7) "Figure 22: Mass Transit Availability" of Chapter 2 was updated to remove the proposed SMART Plan Bus Express Rapid Transit station at SW 136th Street and SW 157th Avenue based on communication from Miami-Dade County Department of Transportation and Public Works indicating that the tentative location for the station has moved east to SW 137th Avenue.
8) Within Chapter 4 (Recommendations), Recommendation No. 1 from the draft report which addressed both Analysis Area 1A and Analysis Area 3A was separated into new Recommendation Nos. 1 and 2 addressing each area individually and expanded to include new recommendations.
9) Chapter 4 (Recommendations) was amended to add a new Recommendation No. 8 adding a CDMP policy directing completion of a study, in partnership with a research institution, that identifies the amount of land needed to maintain an economically viable agricultural industry and the associated challenges with maintaining the necessary acreage.
10) Chapter 4 (Recommendations) was amended to add flexibility related to the proposed creation of standards addressing uses that have a unique need to locate outside of the Urban Development Boundary.
11) Chapter 4 (Recommendations) was amended to clarify Recommendation No. 6 which proposes to identify areas located outside of the UDB as areas that cannot be annexed.

Copies of the draft UEA Study, dated March 10, 2021, can be obtained from the Department of Regulatory and Economic Resources, Planning Division.

Urban Expansion Area Report

provided pursuant to CDMP Policy LU-8J

May 7, 2021

Miami-Dade County
Department of Regulatory and Economic Resources

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Miami-Dade County Department of Planning and Zoning

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Executive Summary

This report is provided in response to Policy LU-8J in the County's Comprehensive Development Master Plan (CDMP) which directs completion of a study of (i) additional areas that may be identified as urban expansion areas, with a goal of replacing the 1,993 acres that were proposed for removal in Application No. 5 of the Evaluation and Appraisal Report Amendments in the May 2019 CDMP Amendment Cycle, and (ii) potential additional uses that would be appropriate for the Urban Expansion Areas, particularly near the Homestead Air Reserve Base.

> CDMP POLICY LU-8J
>
> BY NO LATER THAN THE TIME TO FILE AN APPLICATION IN THE MAY 2021 CDMP AMENDMENT CYCLE TO AMEND THE URBAN EXPANSION AREAS (UEA), MIAMI-DADE COUNTY SHALL COMPLETE A STUDY OF (I) ADDITIONAL AREAS THAT MAY BE IDENTIFIED AS URBAN EXPANSION AREAS, WITH A GOAL OF REPLACING THE 1,993 ACRES THAT WERE PROPOSED FOR REMOVAL IN APPLICATION NO. 5 OF THE EVALUATION AND APPRAISAL REPORT AMENDMENTS IN THE MAY 2019 CDMP AMENDMENT CYCLE, AND (II) POTENTIAL ADDITIONAL USES THAT WOULD BE APPROPRIATE FOR THE URBAN EXPANSION AREAS, PARTICULARLY NEAR THE HOMESTEAD AIR RESERVE BASE. A DRAFT OF THIS STUDY SHALL BE MADE AVAILABLE FOR REVIEW BY THE PUBLIC BY MARCH 15, 2021.

In the May 2019 CDMP Amendment Cycle, the County Department of Regulatory and Economic Resources filed a series of amendments related to the 7-year Evaluation and Appraisal Report (EAR) update of the CDMP, as mandated by state law. On July 22, 2020, the Miami-Dade Board of County Commissioners (Board) adopted Ordinance Nos. 20-77, 20-78, and 20-79 taking final actions on EAR Application Nos. 6 and 7 and a portion of Application No. 5 in the May 2019 Cycle to Amend the CDMP. The Board bifurcated the portion of Application No. 5 that proposed to contract the boundaries of the Urban Expansion Areas and deferred final action pending completion of a study that was directed by the Board through Policy LU-8J.

Urban Expansion Areas (UEA) were first depicted on the CDMP Land Use Plan Map in 1983. Policies related to military compatibility and ecosystem protection and restoration have changed since the UEAs were first depicted which has resulted in certain areas within the current UEAs being identified in the CDMP as areas where urban development is considered undesirable (as outlined in Policy LU-8G). Amendments proposed by County planning staff in the May 2019 CDMP Amendment Cycle recommend contractions to the boundaries of the current Urban Expansion Areas to exclude areas that "shall not be considered" for expansion of the UDB pursuant to Policy LU-8G. These areas include the Bird Drive Wetlands, Comprehensive Everglades Restoration Plan (CERP) areas identified through detailed engineering and Homestead Air Reserve Base (HARB) accident potential zones. The proposed changes will provide for internal consistency within the CDMP. With the proposed contractions, the acreage within the Urban Expansion Areas would be reduced from ±6,718 acres to ±4,725 acres. Approximately 711 acres of the area proposed for contraction is in public ownership. The proposed changes to the UEAs are depicted on Figure 1 of this report.

In order to provide recommendations in accordance with CDMP Policy LU-8J, this study assesses the areas generally located within two miles of the Urban Development Boundary (UDB). The Study Area, as identified on Figure 1, was selected to allow for an analysis of boundary conditions along the UDB, it does not represent the area that would be considered for future growth. The report analyzes the various

policy considerations that make areas within the Study Area more or less suitable for development and provides recommendations.

Among the primary considerations when assessing the need for new Urban Expansion Areas is the development capacity inside the current UDB and UEAs. The UDB and UEAs are tools used to plan for near-term and long-term growth while protecting important resources. The County's near-term planning period, currently 2030, serves as the planning horizon for the UDB and land use patterns and densities expressed on the Land Use Plan map, as well as for near-term facility planning. The long-term planning period, currently 2040, is used principally for identifying areas most appropriate for long-term urban growth (Urban Expansion Areas) and facilities with long-term consequences.

The recommendations provided in this report are underpinned by analysis demonstrating that the UDB and UEAs, including proposed contractions, are sufficient to accommodate long-term population growth. As noted in the Background section (Chapter 1) of this report, there is sufficient residential capacity within the UDB beyond 2040, which is beyond the County's short-term and long-term planning horizons. In addition, there are approximately 2,000 acres in the current UEAs (including contractions proposed in Application No. 5 of the May 2019 Cycle) that are generally suitable for residential development. Within the UDB, there is sufficient capacity of industrial land countywide and within each analysis tier beyond 2040, except for the South-Central Tier which has a projected depletion year of 2030. In addition, there are approximately 2,700 acres in the current UEAs (including contractions proposed in Application No. 5 of the May 2019 Cycle) that are generally suitable for non-residential uses. Therefore, no additional Urban Expansion Areas are recommended in this report.

As is detailed in the Policy Considerations (Chapter 2) of this report, land outside of the UDB serves important human health, environmental and economic functions for the County. Decisions regarding where future growth should be accommodated outside of the current UDB requires a balancing of the anticipated benefits of growth against the loss of those functions. Once there is a need to identify additional Urban Expansion Areas, the County should look to areas with fewer constraints and good access to infrastructure such as the Detailed Analysis Areas assessed in Chapter 3 of this report. These areas include ±1,398.8 acres located in the North Lake Belt area south of NW 170th Street, between Okeechobee Road and the Turnpike and ±596.5 acres generally located within one-half mile of the South Dade Transitway SMART Plan Corridor. Together, these areas are roughly equivalent to the acreage proposed for contraction in Application No. 5 of the May 2019 CDMP Amendment Cycle. Recommendation Nos. 1 and 2 of this report provides recommended measures to address potential impacts associated with growth into new Urban Expansion Areas that may be identified in the future.

CDMP Policy LU-8J also directs the study to address potential additional uses that would be appropriate for the Urban Expansion Areas. Recommendation Nos. 3 and 4 of this report address the second portion of the policy by recommending the incorporation of criteria into the CDMP to address uses that have a unique need to locate outside of the UDB and providing for a reassessment of commercial truck parking needs by 2030. The analysis provided in this report brought to light numerous issues that are also addressed in the Recommendations (Chapter 4) including the need to increase housing diversity, retain County governance of areas outside of the UDB, update analysis related to agriculture, and clarify policies related to the Redland area.

As required by Policy LU-8J, a draft version of the report was made available for public review on March 15, 2021. Comments received during the public review period, as contained in Appendix 6 of the report, were considered in the final report. This report was prepared by the Department of Regulatory and Economic Resources, Planning Division in coordination with the Division of Environmental Resources Management, Development Services, Office of Resilience, Agricultural Manager, Water and Sewer Department, Department of Transportation and Public Works, and the Miami-Dade Transportation Planning Organization.

Chapter 1

Background

Urban Development Boundary and Urban Expansion Areas

The Urban Development Boundary (UDB) is included on the CDMP Land Use Plan map to distinguish the area where urban development may occur through the year 2030 from areas where it should not occur. Adequate countywide development capacity is maintained within the UDB by increasing development densities or intensities inside the UDB, or by expanding the UDB, when the need for such change is determined to be necessary through the plan review and amendment process. Applications to move the UDB are accepted every other year in odd numbered years. The criteria for applications requesting expansion of the UDB are primarily contained in CDMP Policies LU-8F, LU-8G and LU-8H which are included in Appendix 1: Relevant CDMP Policies.

There are currently four Urban Expansion Areas (UEA) totaling approximately 6,718 acres as depicted on Figure 1. Urban Expansion Areas were first depicted on the CDMP Land Use Plan map in 1983. The Urban Expansion Areas are located outside of the UDB and represent areas where urban development may be warranted within the 2040 long-term planning horizon of the CDMP based on an analysis of available capacity inside of the UDB. However, the CDMP further notes the uncertainty in the timing and amount of expansion that will be needed due to unpredictability in the long-term rates of population and economic growth; housing and community preferences; availability and price of energy, water, agricultural and mineral resources; and State, federal and international influences. Once a need to expand the UDB is established pursuant to Policy LU-8F, the CDMP indicates that the Urban Expansion Areas should be prioritized for inclusion (Policy LU-8G(iii)(b)). Until the Urban Expansion Areas are brought into the UDB through the CDMP review and amendment process, they are permitted to be used in a manner consistent with the applicable "Agriculture" or "Open Land" CDMP Land Use Plan Map designation.

As summarized in Table 1, approximately 1,993 acres of the current UEAs are identified as areas that shall not be considered for expansion of the UDB pursuant to Policy LU-8G. These areas include the Bird Drive Wetlands, Homestead Air Reserve Base Accident Potential Zones and Comprehensive Everglades Restoration Plan (CERP) projects identified through a Project Implementation Report or Tentatively Selected Plan. The remaining areas of UEA Nos. 3 and 4 (with the exception of ±26 acres) are within the Coastal High Hazard Area which is identified as an area that shall not be considered for residential development pursuant to Policy LU-8G. Therefore, there are between 1,875 and 2,210 acres in the current UEAs that may generally be suitable for residential development barring additional restrictions. There are between 2,541 and 2,850 acres in the current UEAs that may be suitable for non-residential uses.

Table 1: Urban Expansion Area Acreage

UEA No.	Current Acreage	Shall Not Be Considered for Expansion of UDB (per LU-8G)*	Remaining Acreage
1	±309	0	±309
2	±2,825	±950	±1,875
3	±3,124	±667	±2,457
4	±460	±376	±84
TOTAL	**±6,718**	**±1,993**	**±4,725**

Prepared by: Miami-Dade County RER-Planning Division

** Including isolated parcels*

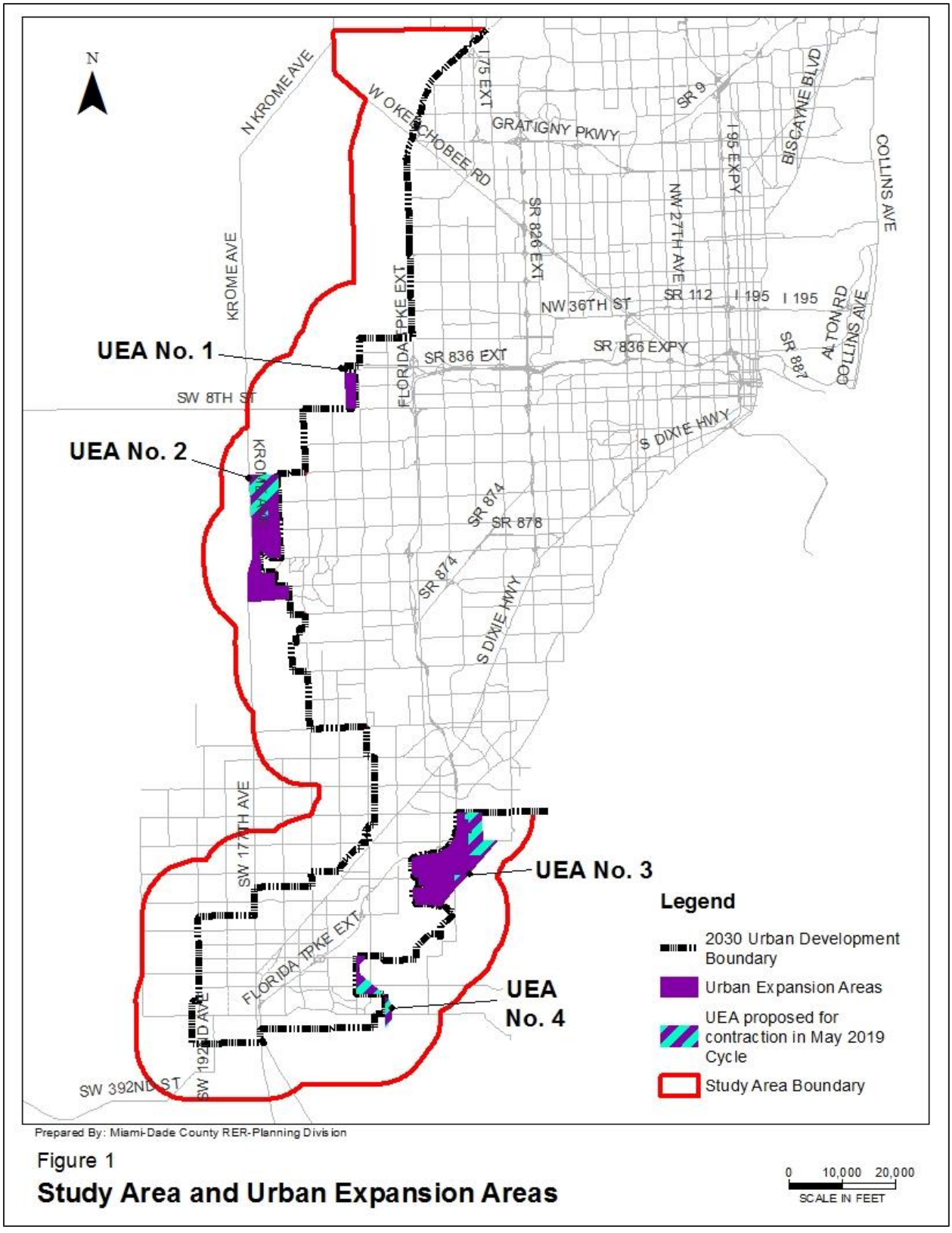


Figure 1

Study Area and Urban Expansion Areas

Development Capacity Analysis

The County conducts a development capacity analysis for the purpose of ascertaining the amount of land available for future residential growth inside of the Urban Development Boundary (UDB). Demand for residential units is determined based on projected population growth and "persons per household" data provided by the U.S. Census Bureau. Capacity of land within the UDB is determined by assessing the development potential of vacant land and the redevelopment potential of underdeveloped parcels. The full Development Capacity Methodology is included as Appendix 2.

CDMP Policy LU-8F states that the UDB should contain developable land having capacity to sustain projected countywide residential demand for a period of 10 years. Further, state law requires the CDMP Land Use Plan Map to accommodate the minimum amount of land required to accommodate projected population growth for at least a 10-year planning period. Based on the County's current Development Capacity Analysis, there is sufficient residential capacity within the UDB to accommodate projected population growth beyond 2040 (see Table 2.1). As noted previously, there are approximately 2,000 acres within the current Urban Expansion Areas (UEA) that may be suitable for residential development. At the minimum density of 10 dwelling units per acre for UDB amendment applications (pursuant to Policy LU-8H), this would be expected to accommodate a minimum of 20,000 residential units. Therefore, there is sufficient acreage within the current UEAs (including contractions proposed in Application No. 5 of the May 2019 Cycle) to accommodate projected growth well beyond 2040, the County's long-term planning horizon.

Pursuant to CDMP Policy LU-7F, the adequacy of non-residential land supplies is determined on the basis of land supplies in subareas of the County appropriate to the type of use, as well as the Countywide supply within the UDB. Tiers, Half-Tiers and combinations thereof are considered along with the Countywide supply when evaluating the adequacy of land supplies for regional commercial and industrial activities. The adequacy of land supplies for neighborhood- and community-oriented business and office uses is determined on the basis of localized subarea geography such as Census Tracts, Minor Statistical Areas (MSAs) and combinations thereof. As shown in Table 2.2, there is sufficient countywide capacity of industrial beyond 2040. In addition, there is sufficient capacity of industrial land in each of the Planning Tiers beyond 2040, except for the South-Central Tier which has a projected depletion year of 2030. As noted previously, there are between 2,541 and 2,850 acres in the current UEAs (including contractions proposed in Application No. 5 of the May 2019 Cycle) that may be suitable for non-residential uses.

While there is sufficient overall capacity inside the UDB to accommodate projected countywide population growth, the supply of single family residential uses in the County is projected to be depleted by 2024. A review of current residential land uses in the County shows that single family residential (including detached single family and townhomes) comprises approximately 87% of the residential land area. However, due to the land intensive nature of single family housing, it does not contribute significantly to residential capacity. The gap in depletion years between single family and multi-family housing warrants consideration of how the County can ensure a sufficient mix of housing options, particularly for families. A closer look at the current residential land uses in the County shows that townhome development is underrepresented within the single-family category, comprising only six percent. With its lower land costs, townhome-type development provides an important housing option for moderate income families. The County should aim to strategically increase the diversity of housing options, focusing primarily within the UDB, while maintaining the character of established neighborhoods.

Table 2.1
Residential Land Supply/Demand Analysis
Miami-Dade County, 2019 to 2040

Analysis Done Separately for Each Type, i.e. No Shifting of Demand between Single & Multifamily Type	Structure Type		
	Single Family	Multi-Family	Both Types
Capacity in 2019	28,581	233,655	262,236
Annual Demand in 2015-2020	4,728	8,391	13,119
Capacity in 2020	23,853	225,264	249,117
Annual Demand in 2020-2025	5,478	5,263	10,741
Capacity in 2025	0	198,949	195,412
Annual Demand in 2025-2030	5,482	5,007	10,489
Capacity in 2030	0	173,914	142,967
Annual Demand in 2030-2035	5,405	4,806	10,211
Capacity in 2035	0	149,884	91,912
Annual Demand in 2035-2040	5,292	4,587	9,879
Capacity in 2040	0	126,949	42,517
Depletion Year	2024	2040+	2040+

Source: Miami-Dade County, Department of Regulatory and Economic Resources, Research and Economic Analysis Section, November 2019.

Table 2.2
Projected Absorption of Industrial Land
Miami-Dade County, Florida 2020 - 2040

Analysis Tier*	Vacant Industrial Land 2020 (Acres)	Industrial Land in Use 2020 (Acres)	Avg Annual Absorption Rate 2020-2040 (Acres)	Projected Year of Depletion
North Tier	1,127.46	3,510.10	30.24	2040+
North Central Tier	983.02	8,230.00	48.80	2040+
South-Central Tier	102.38	949.30	10.15	2030
South Tier	447.85	637.30	5.11	2040+
Countywide	2,660.71	13,326.70	94.30	2040+

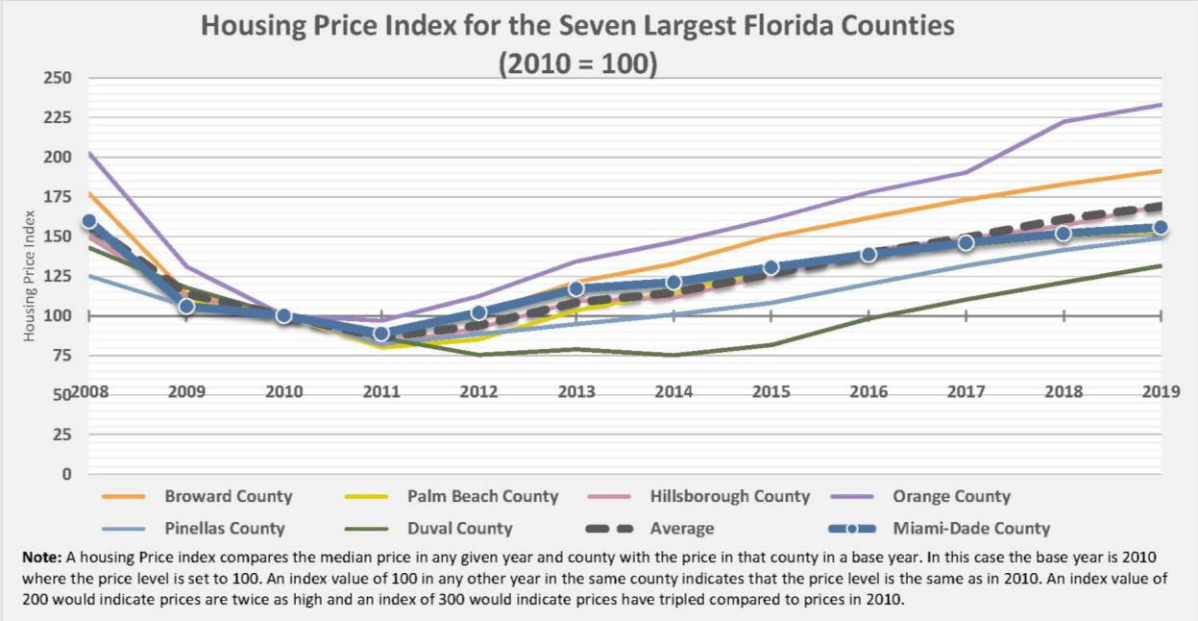
Source: Miami-Dade County, Department of Regulatory and Economic Resources, Planning Division, Research Section, December 2020.

* A map of the Analysis Tiers can be found on Appendix Page 22 of this report.

Impact on Housing Prices

Miami-Dade County, like other major metropolitan areas, has experienced sharp increases in housing costs in recent years. Analysis conducted by the County's Planning Division has found that it is not possible to isolate the Urban Development Boundary as a contributing factor to housing price inflation. There are numerous factors that affect the cost of housing including locational factors, neighborhood amenities, and influence by foreign markets, among others. Housing price changes since 2008 in Miami-Dade County were compared with the seven largest counties in Florida (see Table 3). Similar to Miami-Dade County, the comparison counties have policies that constrain development in certain areas and prioritize development in other areas. However, none of the comparison counties were found to have a growth boundary as restrictive as Miami-Dade County. The data shows that price fluctuations in Miami-Dade County over time were consistent with the average price increases of the comparison counties which supports a conclusion that the UDB does not appear to be exerting inflationary pressure on housing prices.

Table 3



Note: A housing Price index compares the median price in any given year and county with the price in that county in a base year. In this case the base year is 2010 where the price level is set to 100. An index value of 100 in any other year in the same county indicates that the price level is the same as in 2010. An index value of 200 would indicate prices are twice as high and an index of 300 would indicate prices have tripled compared to prices in 2010.

Data Source: Zillow.com accessed on October 21, 2019; Planning Research and Economic Analysis

Miami-Dade County Urban Expansion Area Task Force

The Miami-Dade County Urban Expansion Area Task Force was created in 2017 for the purpose of providing recommendations on the following topics:

1) Changes to the current boundaries of the Urban Expansion Areas;
2) Creation of new Urban Expansion Areas; and
3) Changes to the criteria that should be considered for applications requesting expansion of the UDB.

The Task Force met 14 times between August 2017 and May 2018. During the course of the meetings, Task Force members heard presentations from governmental agencies and various experts on issues pertinent to the charge of the Task Force. Recommendations of the Task Force were compiled through member surveys and only those recommendations receiving at least 51% support were advanced as recommendations of the Task Force in the Final Report.

Many of the recommendations of the Task Force have already been considered within Application No. 5 of the May 2019 CDMP Amendment Cycle including the bifurcated portion addressing contraction of the current Urban Expansion Areas. As previously noted, the Task Force was charged with providing recommendations on the creation of new Urban Expansion Areas, however, they did not garner majority support for the identification of any new UEAs. There was, however, majority support against maintaining a minimum amount of acreage in the UEAs and against the designation of a new UEA in the area bounded on the north by UEA No. 2, south by SW 184th Street, and west by Krome Avenue. Details on the UEA Task Force and the Final Report can be found at: www.miamidade.gov/planning/urban-expansion-area-task-force.asp

Municipal Boundaries Outside the UDB

Two cities in Miami-Dade County contain land outside of the Urban Development Boundary, Homestead and Florida City, as depicted on Figure 2. Section 2-116.1.2 of the County Code sets out the applicability of the County's CDMP to municipalities, as follows:

a) The location of the Urban Development Boundary (UDB) and permitted land uses outside the UDB shall be governed by the Miami-Dade County comprehensive Development Master Plan (CDMP) notwithstanding the fact that the UDB may lie within a municipality.
b) Any amendments to the UDB line or land uses permitted by the CDMP shall be filed and processed in accordance with procedures for applications located within the unincorporated area.
c) All municipal land use decisions outside the UDB line shall be consistent with the CDMP.

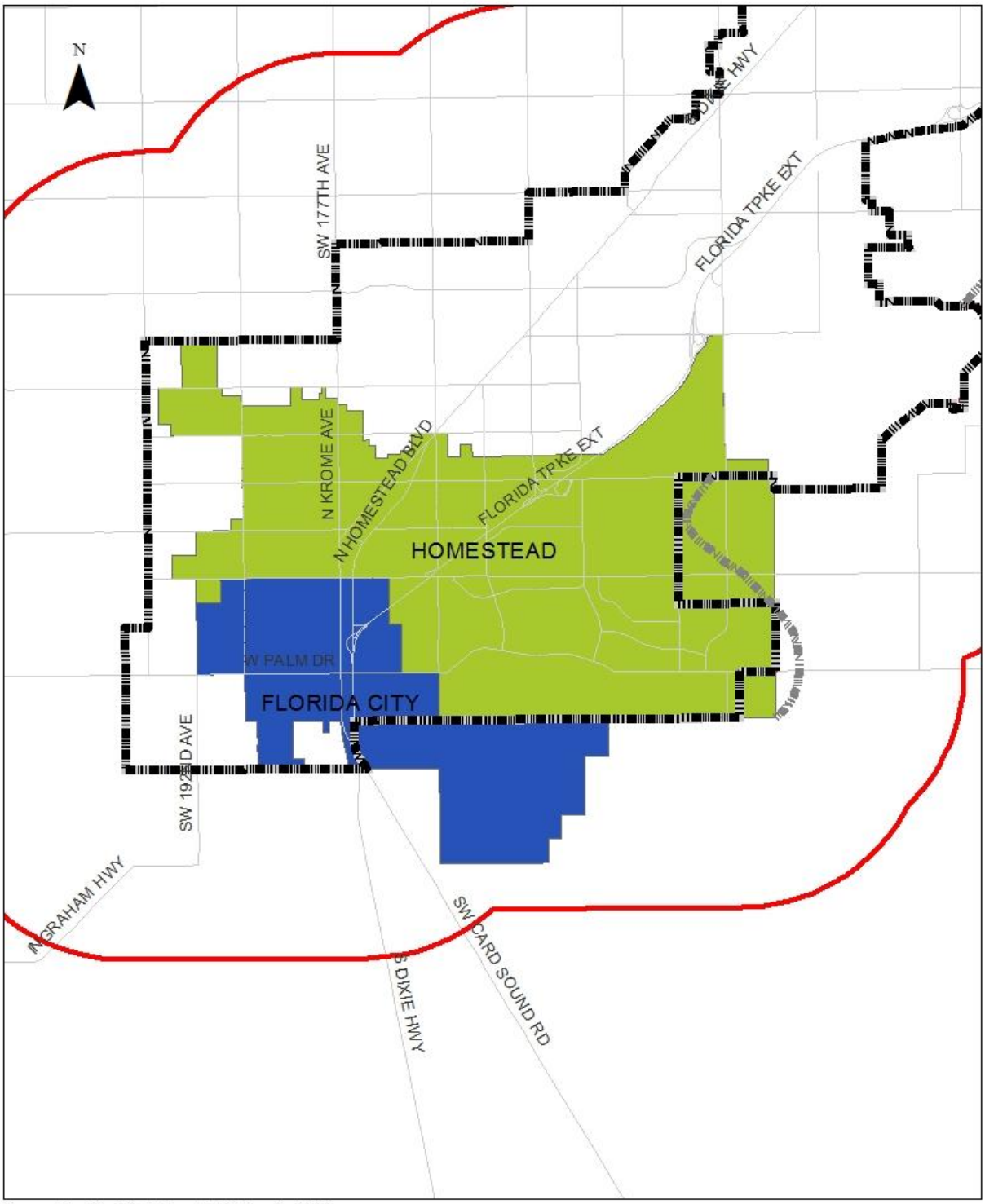


Figure 2

Municipal Boundaries Outside UDB

Chapter 2

Policy Considerations

I. Wetlands and CERP Water Management Areas

Wetland systems serve significant functions including filtering and purifying surface and groundwater, providing habitat for wildlife, providing direct recharge of water to the Biscayne Aquifer (the County's primary source of drinking water), and providing natural flood protection. Figure 3 below identifies Wetlands of Regional Significance which are also identified in the CDMP (Page I-88). Figure 3 does not represent an exhaustive list of wetland communities in the County, it depicts the general boundaries of wetland systems that serve regionally significant functions. The ownership pattern of land in the Wetlands of Regional Significance are depicted on Figure 4.

The CDMP notes that the most important factors affecting the future viability of these wetland systems will be the ability of Miami-Dade County and the South Florida Water Management District (SFWMD) to maintain more natural water table levels or hydroperiods in these areas; the ability of the U.S. Army Corps of Engineers to recreate a more natural flow of water into the NE Shark River Slough, Everglades National Park and Biscayne National Park; the speed with which biological or other controls for the spread of invasive exotic plant species such as Melaleuca can be found, tested and implemented; and the commitment to wetland management and restoration efforts including the Comprehensive Everglades Restoration Plan (CERP).

CDMP Policy CON-7A indicates that the degradation or destruction of Wetlands of Regional Significance is limited to activities that 1) are necessary to prevent or eliminate a threat to public health, safety or welfare; or 2) are water dependent and no other reasonable alternative exists; or 3) clearly in the public interest and no other reasonable alternative exists; or 4) are carried out in accordance with an approved basin management plan; or 5) are in areas that have been highly disturbed or degraded and where restoration of a wetland with an equal or greater value in accordance with federal, State and local regulations is feasible. Policy CON-7A further states that habitats critical to endangered or threatened species shall not be degraded or destroyed.

Portions of the Wetlands of Regional Significance are identified as areas that shall not be considered for expansion of the UDB in CDMP Policy LU-8G. These areas include Everglades National Park, Biscayne National Park, Water Conservation Areas, Pennsuco Wetlands, Bird Drive Wetlands and CERP project footprints identified in a Tentatively Selected Plan and/or Project Implementation Report. The remaining portions of the Wetlands of Regional Significance are identified as areas that should be avoided for expansion of the UDB. CDMP Policy CM-1A also prohibits the alteration of mangroves within and adjacent (to the landward extent of the mangroves) to Biscayne National Park, Everglades National Park, Card Sound, Manatee Bay, Florida Bay and Barnes Sound. Those areas of the Wetlands of Regional Significance that are identified as areas that shall not be considered for the expansion of the UDB are described in more detail below:

National Parks. Everglades National Park is identified as a World Heritage Site by the United Nations Educational, Scientific and Cultural Organization (UNESCO). The 2017 Conservation Outlook for World Heritage Sites prepared by the International Union for Conservation of Nature (IUCN) identified the current state of Everglades National Park to be critical and documented the need for ecosystem restoration projects outside of the Park boundaries that deliver more clean

water to the site.[1] The shoreline area of Biscayne National Park includes mangrove wetlands that serve to filter the water reaching the Bay, stabilize the shoreline, provide habitat for animals, birds and marine life and provide storm surge attenuation for inland areas. For this reason, mangrove and scrub mangroves within and adjacent to Biscayne National Park and Everglades National Park to the landward extent of the mangroves are designated as Mangrove Protection Areas pursuant to CDMP Policy CM-1A.

Pennsuco Wetlands. The Pennsuco Wetlands are generally bounded on the west and north by Levee 30, on the east by the Dade-Broward Levee and on the south by the Tamiami Canal (C-4). The area has been identified as a mitigation area for wetland impacts associated with limestone mining activities in the Miami-Dade County Lake Belt. Land acquisition and restoration efforts are ongoing, although nearing completion. Approximately 88% of the Pennsuco Wetlands have been or are actively being restored, however additional land acquisition and restoration is anticipated.

Bird Drive Wetlands. The Bird Drive Wetlands are identified as a prime recharge area by the SFWMD which includes areas displaying infiltration rates greater than or equal to 42 inches/year. Further, the Bird Drive Everglades Basin Special Area Management Plan found that the area has several characteristics that give it a high potential for aquifer recharge. The area experiences abundant rainfall, has a fairly high water infiltration rate and, due to elevations in the surrounding area, loses very little water to surface flow out of the area. In addition, the water flowing to the area is of high quality due to limited upstream sources of pollution. The area also contains high-quality wetland resources that improve the quality of the water filtering to the aquifer and could provide foraging habitat for federally-designated threatened and endangered species.

Comprehensive Everglades Restoration Plan. The Comprehensive Everglades Restoration Plan (CERP) as authorized in the Water Resources Development Act (WRDA) of 2000, also referred to as the "Restudy", included 68 projects necessary to restore important functions and values of the Everglades and south Florida ecosystems and plan for the long-term water resource needs of south Florida. CERP project footprints are depicted on Figure 3 below. The CERP projects, as presented in the April 1999 "Final Integrated Feasibility Report and Programmatic Environmental Impact Statement", are conceptual in nature and were expected to take approximately 30 years to implement. Project Implementation Reports (PIR) are finalized for each CERP project to evaluate its effectiveness and identify needed refinements or modifications. Project Implementation Reports are prepared by multi-jurisdictional Project Delivery Teams (PDT) in accordance with the CERP Programmatic Regulations. Identification of the tentatively selected plan occurs as part of the PIR process following plan formulation and evaluation and before plan design.[2]

CERP projects authorized through the Restudy in Miami-Dade County are shown in Table 4. CERP projects that have been deauthorized pursuant to Section 6001(d) of the Water Resources Reform and Development Act include the Lake Belt In-Ground Reservoir Technology project and

[1] Accessed online at: https://worldheritageoutlook.iucn.org/explore-sites/wdpaid/2012

[2] USACE and SFWMD. Central and Southern Florida Project CERP Programmatic Regulations: Six Program-Wide Guidance Memoranda. April 2005.

the Wastewater Reuse Technology project. The Bird Drive Wetlands are also depicted as being within a CERP project footprint, however, this CERP project was not found to be feasible for the purposes envisioned in the 2000 CERP authorization and has not been authorized for construction. There is general consensus that the project as conceptually designed would need to be modified or redesigned based on aquifer characteristics in the area. Alternatives are being considered to recapture some of the anticipated benefits from the Bird Drive Wetlands CERP project. In 2020, the US Army Corps of Engineers began the Project Implementation Report process for the Biscayne Bay and Southeastern Everglades Ecosystem Restoration (BBSEER) project of CERP. The primary focus of the project is on Phase II of the Biscayne Bay Coastal Wetlands project and Phase II of the C-111 Spreader Canal project, however, the study will also encompass other CERP areas. Most notably the study also involves the CERP area in and adjacent to the Lake Belt in an effort to determine whether additional water can be stored and/or delivered from this area to restore southern Biscayne Bay and northeast Florida Bay including the adjacent wetlands. The BBSEER planning effort, which is scheduled to conclude in several years, is expected to provide additional insight into the feasibility of water delivery for benefit of these areas and also to reduce salt intrusion in the groundwater for the protection of well fields in south Miami-Dade County.

Table 4: Miami-Dade County CERP Projects

ID# on Figure 3	Project Name	Project Description
1	North Lake Belt Storage Area	In-ground 90,000 acre-foot capacity storage reservoir including canals, pumps, and water control structures. To be located within a proposed rock mining area
2	Central Lake Belt Storage Area	Combination above-ground and in-ground 190,000 acre-foot storage reservoir including stormwater treatment area, pumps and water control structures. To be located within the Northwest Wellfield Protection Area
N/A	Dade-Broward Levee/Pennsuco Wetlands	Water control structures and modifications to the Dade-Broward Levee and associated conveyance system designed to reduce seepage losses to the east from the Pennsuco Wetlands and southern WCA3B, enhance hydroperiods in the Pennsuco Wetlands, and provide recharge to the Northwest Wellfield
N/A	C-4 Control Structures	Two water control structures located in the C-4 (Tamiami) Canal designed to enhance wetland hydroperiods and recharge to Northwest Wellfield.
3	Bird Drive Recharge Area	Above-ground 11,500 acre-foot capacity recharge area including pumps, water control structures and canals designed to recharge groundwater and reduce seepage from Everglades National Park buffer areas
4	L-31 N Improve for Seepage Mgmt and S-356 Structures	Relocation and enhancement of L-31N, groundwater wells, and sheet flow delivery system designed to improve water deliveries to Northeast Shark River Slough and restore wetland hydro patterns in Everglades National Park
N/A	West Miami-Dade County Reuse	Expansion of a future West Miami-Dade Wastewater Treatment Plant to produce advanced treatment of wastewater to meet demands for the Bird Drive Recharge Area, South Dade Conveyance System, and Northeast Shark River Slough
5	C-111 Spreader Canal	Construction, modification or removal of levees, canals, pumps, water control structures and a stormwater treatment area in the Model Lands and South Glades (C-111 Basin) designed to improve deliveries and enhance connectivity and sheet flow, reduce wet season flows, and decrease potential flood risk in far south Miami-Dade County
6	Biscayne Bay Coastal Wetlands	Pump stations, spreader swales, stormwater treatment areas, flowways, levees, culverts, and backfilling canals covering 13,600 acres from Deering Estate at C-100C, south to FPL Turkey Point Nuclear Power Plant, generally along L-31E.

N/A	South Miami-Dade County Reuse	Expansion of existing South District Wastewater Treatment Plan located north of the C-1 (Black Creek) Canal to produce advanced treatment of wastewater to be supplied to the South Biscayne Bay Coastal Wetlands Project
N/A	Restoration of Pineland & Hardwood Hammock in C-111	Re-establishment of native slash pine and hardwood hammock forest in a portion of rock plowed land in the Frog Pond purchased by the SFWMD in order to restore the Taylor Slough portion of the Everglades.
*Source: Central and Southern Florida Project Comprehensive Review Study, US Army Corps of Engineers, 1998** **This table depicts projects authorized in the CERP 1999 Final Integrated Feasibility Report and Programmatic Environmental Impact Statement and does not account for project revisions.*		

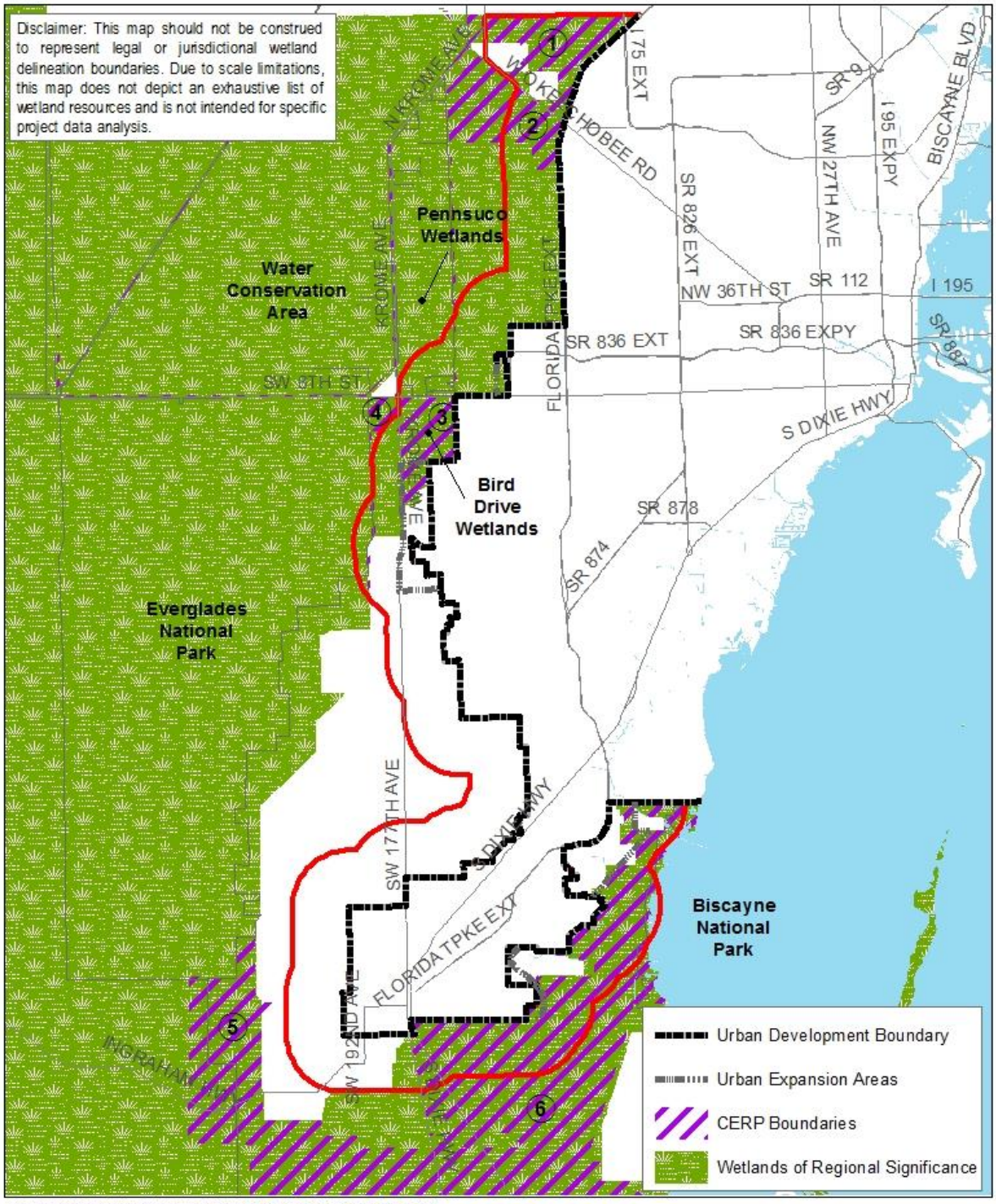
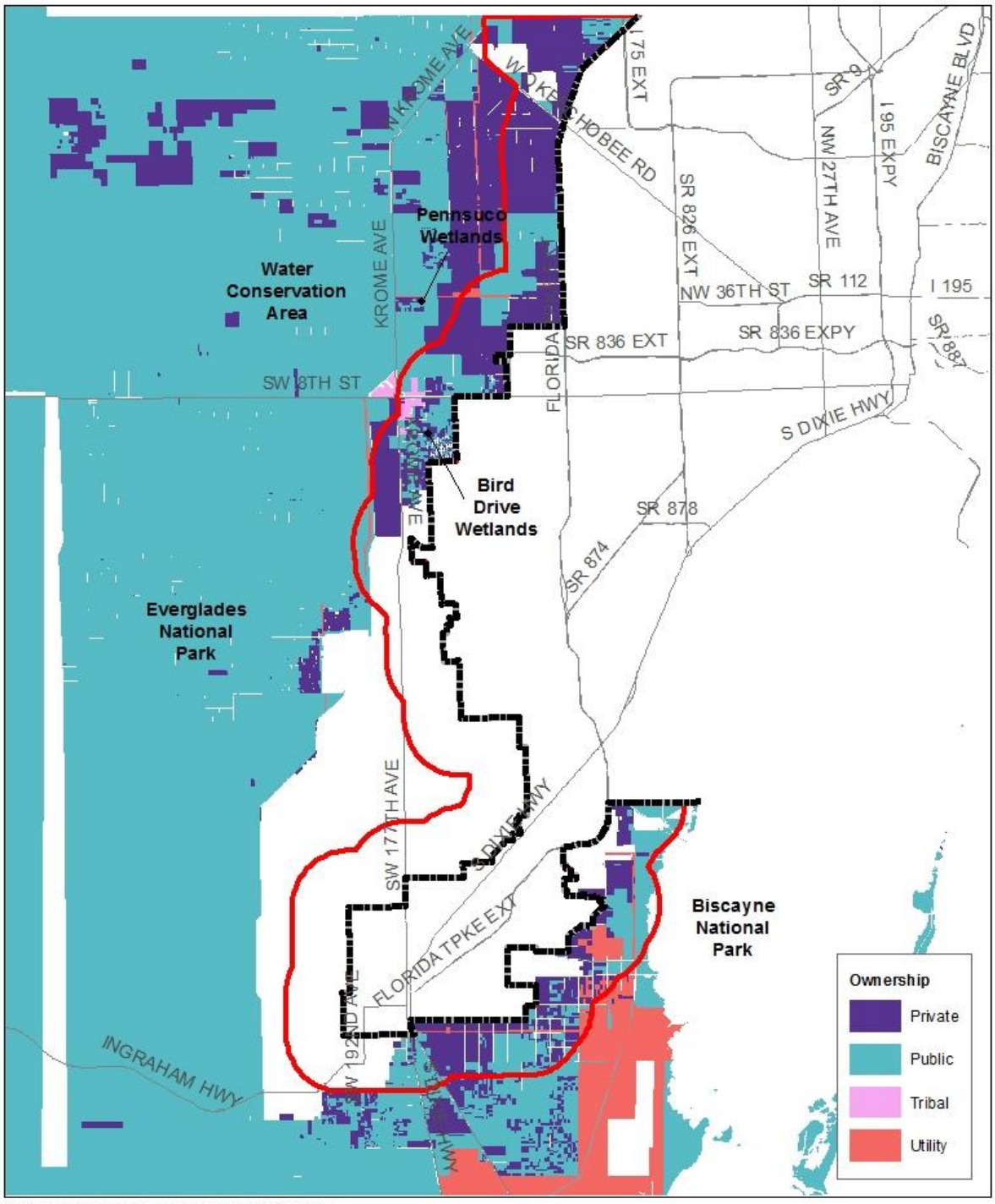


Figure 3

Wetlands of Regional Significance (outside UDB)



Source: Miami-Dade County Property Appraiser Data

Figure 4
Ownership Pattern

II. Threatened and Endangered Species

Miami-Dade County is a biological hotspot for a number of species and habitats. Appendices A and B of the CDMP Conservation Element enumerate over 400 federal-, state- and county-listed species of plants and animals that are either present or were historically present in the County. Some, but not all, listed species have critical habitat that has been designated under the Federal Endangered Species Act.

Federal designation of critical habitat affects development applications that involve federal permits or federal funding. Local protections are also important to ensure protection of listed species. CDMP Policy CON-9A states that "all activities that adversely affect habitat that is critical to federal or State designated, endangered or threatened species shall be prohibited unless such activity(ies) are a public necessity and there are no possible alternative sites where the activity(ies) can occur." CDMP Policy CON-9B states that "all nesting, roosting and feeding habitats used by federal or State designated endangered or threatened species, shall be protected and buffered from surrounding development or activities and further degradation or destruction of such habitat shall not be authorized." A detailed analysis of specific threatened and endangered species is presented in the following paragraphs.

State and Federally Listed Bird Species

State and federally listed bird species, as listed in Appendix B of the CDMP Conservation Element, utilize a range of habitats in Miami-Dade County such as freshwater wetlands, tidal marshes, farm fields, open urban spaces and forests. Occurrence data is frequently collected by the public during the annual winter bird count and through the eBird birding program. While providing lower quality data (sightings need to be verified three times before considered research quality), the data, at a minimum, gives an indication of relative abundance of these species. Two federally listed bird species known to be present in or near the Study Area, the Wood Stork and Everglades Snail Kite, are discussed in more detail below.

Wood Stork. The Wood Stork is currently designated as "threatened" under the federal Endangered Species Act and by the State of Florida. The species was upgraded from a designation as "endangered" in 2014 due to successful conservation and recovery efforts. There are currently three wood stork rookeries located near Krome Avenue and Tamiami Trial (see Figure 5). The foraging area for the wood stork can extend approximately 18 miles around the rookery and include freshwater and estuarine wetlands with depths less than 12 inches. Wood storks prefer to establish rookeries over wetlands that maintain high water stages since these conditions provide protections from potential predators. However, ideal foraging areas include shallow wetland depressions where fish tend to become concentrated. According to the United States Fish and Wildlife Service (FWS) report "Habitat Management Guidelines for the Wood Stork in the Southeast Region" wetlands with varying hydroperiods provide important feeding sites for the Wood Stork as excerpted below:

> *Successful nesting colonies are (sic) those that have a large number of feeding site options, including sites that may be suitable only in years of rainfall extremes. To maintain the wide range of feeding site options requires that many different wetlands, with both relatively short and long annual hydroperiods, be preserved. For example, protecting only, the larger wetlands, or those with longer annual hydroperiods, will result in the eventual loss of smaller, seemingly less important wetlands. However, these small scale wetlands*

are crucial as the only available feeding sites during the wetter periods when the larger habitats are too deeply flooded to be used by storks.

The FWS notes that regional declines in wood stork numbers have been largely due to the loss or degradation of essential wetland habitat.[3] In order to address this issue, the Habitat Management Guidelines for the Wood Stork in the Southeast Region provide recommended land use restrictions for areas within 2,000 feet of the rookeries. Further, the U.S. Fish and Wildlife Service has identified Core Foraging Areas that extend approximately 18 miles around established Wood Stork rookeries but noted that suitable foraging habitat proximate to the nesting colonies is particularly important to the success of wood stork populations.[4] Characteristics that make wetlands more suitable to Wood Stork foraging include sparse or no vegetative canopy and longer hydroperiods that allow for greater fish densities.[5]

Everglade Snail Kite. The Everglade Snail Kite has been designated as "endangered" pursuant to the Endangered Species Act since 1967. Critical habitat was designated in 1977 and is reflected on Figure 7. It is also designated as "endangered" by the State of Florida. The medium-sized raptor primarily feeds on apple snails. Foraging habitat for the Snail Kite primarily consists of freshwater marshes, as well as natural and man-made lakes that contain apple snails. Roosting sites for the Snail Kite primarily consist of Cypress trees.[6] In Miami-Dade County, Snail Kites have been documented in Everglades National Park, Water Conservation Area 3, the C-111 Basin and smaller dispersed wetlands within this range.[7] The Everglade Snail Kite Recovery Plan notes that the principal threat to the species is the loss or degradation of wetlands.

Florida Bonneted Bat

The Florida Bonneted Bat has been listed as "Endangered" under the Endangered Species Act since 2013. They have been documented in a variety of natural habitats including: pine flatwoods, pine rocklands, cypress, hardwood hammocks, mangroves, wetlands, rivers, lakes, ponds and canals. In addition to natural roosts, bats will also roost in artificial structures such as bat houses and building crevices in urban and rural areas. However, the US Fish and Wildlife Service notes that roosting sites may be at risk of inadvertent or purposeful removal or disturbance when located near residences.[8] In Miami-Dade County, primary foraging habitat includes areas that provide a combination of open area and water sources within urban and agricultural areas. For example, one area of high utilization includes artificial freshwater lakes adjacent to intact pine rocklands. Known active roosting sites include seven bat houses at or near Zoo Miami.[9]

In June 2020, the US Fish and Wildlife Service issued proposed rulemaking to designate critical habitat for the Florida Bonneted Bat which focuses on large connected natural areas which are

[3] United States Fish and Wildlife Service's "Habitat Management Guidelines for the Wood Stork in the Southeast Region"

[4] US Fish and Wildlife Service. Wood Stork: Multi-Species Recovery Plan for South Florida. Accessed online at: https://www.fws.gov/verobeach/msrppdfs/woodstork.pdf

[5] https://www.fws.gov/verobeach/BirdsPDFs/20120712_WOST%20Forage%20Assessment%20Methodology_Appendix.pdf

[6] https://www.fws.gov/verobeach/MSRPPDFs/EvergladeSnailKite.pdf

[7] https://www.fws.gov/verobeach/MSRPPDFs/EvergladeSnailKite.pdf

[8] Federal Register. Volume 85, Number 112. June 10, 2020.

[9] Federal Register. Volume 85, Number 112. June 10, 2020.

relatively free of human disturbances. In Miami-Dade County, the proposed critical habitat includes the last remaining high-quality natural habitat on the east coast of Florida.[10] Figure 7 depicts the proposed critical habitat for the Florida Bonneted Bat in Miami-Dade County. The proposed rule notes that special management considerations or protections may be needed for the designated area. The US Fish and Wildlife Service is expected to detail this guidance in a forthcoming recovery plan for the Florida Bonneted Bat.

Florida Panther

The Florida Panther has been designated as "Endangered" under the federal Endangered Species Act since 1967. It is also designated as "Endangered" by the State of Florida. Large contiguous areas of land are needed in order for Panther populations to expand and thrive. Areas with dense understory vegetation provide important habitat for panthers.[11] While USFWS has not designated critical habitat for the Florida Panther, it has identified a series of "zones" that are considered important to supporting the protection and expansion of panther populations (see Figure 6). The Florida Panther Recovery Plan (March 1995) establishes the goal of maintaining the quantity and quality of habitat in the Primary Zone, maintaining the quantity and improving the quality of habitat in the Secondary Zone, as well as preventing negative impacts of roads. The Recovery Plan further details the vulnerabilities to panther habitat as follows:

> *Habitat loss, degradation, and fragmentation is the greatest threat to panther survival, while lack of human tolerance threatens panther recovery. Panther mortality due to collisions with vehicles threatens potential population expansion. Potential panther habitat throughout the Southeast continues to be affected by urbanization, residential development, road construction, conversion to agriculture, mining and mineral exploration, and lack of land use planning that recognizes panther needs.*

Bartram's Scrub Hairstreak and Florida Leafwing Butterflies

The Bartram's scrub-hairstreak and Florida leafwing butterflies were listed as "endangered" under the federal Endangered Species Act in 2014. Critical habitat was designated at the same time (see Figure 7). The species have also been designated "endangered" by the State of Florida.

The Bartram's scrub-hairstreak and Florida Leafwing occur only within pine rocklands, specifically those with pineland croton, the only known hostplant for the butterflies.[12] The US Fish and Wildlife Service notes that the extent of pineland croton within remaining pine rockland habitat fragments is not fully known, however a review of County land by the Miami-Dade County Division of Environmental Resources Management (DERM) has identified abundance within certain natural areas. Additional studies are ongoing to identify the presence of pineland croton within remaining pine rockland habitat. The Florida Natural Areas Inventory identifies pine rockland as "critically imperiled globally" due to its rarity and high risk of extinction. Both species of butterfly are teetering on the edge of extinction, with Florida Leafwing only regularly being found in a small area of Everglades National park and with rare sightings in a County preserve near Florida City.

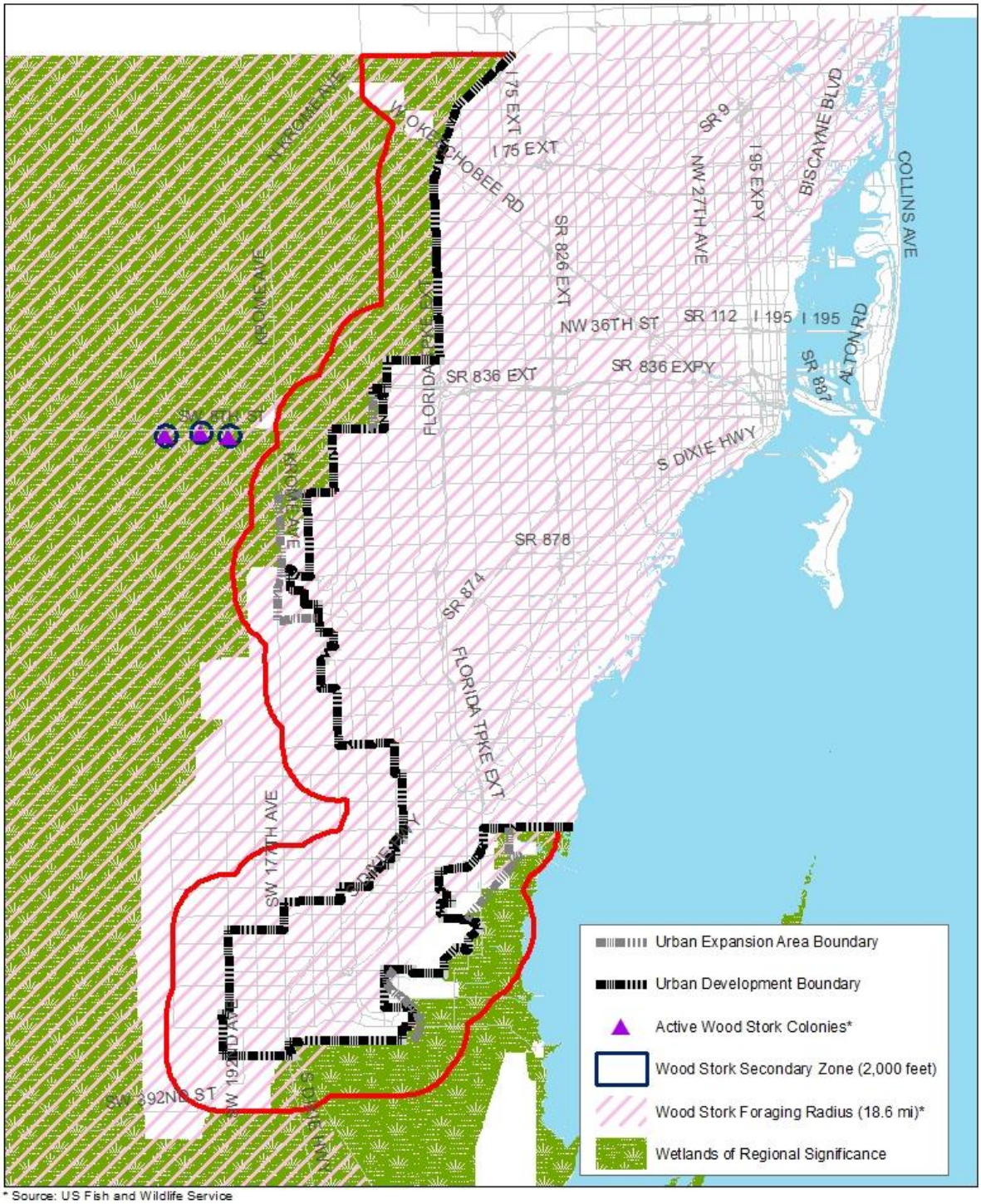
[10] Federal Register. Volume 85, Number 112. June 10, 2020.
[11] U.S. Fish and Wildlife Service. Florida Panther Recovery Plan. March 1995.
[12] https://www.fws.gov/verobeach/StatusoftheSpecies/20151006_SOS_BartramsScrubHairstreak.pdf

Fire maintenance is essential to maintaining the viability of pine rockland communities. Land uses that inhibit the ability to maintain the necessary fire regimen can threaten the remaining pine rockland communities. To support the reestablishment of pine rockland vegetation, Fairchild Tropical Botanic Gardens, has partnered with Federal, State, local, and nonprofit organizations, to establish the “Connect to Protect Network” which encourages property owners to plant native pine rockland species.

Federal and State Listed Plant Species

Florida Brickell Bush, deltoid spurge, pineland sandmat, Gould’s sandmat, garber’s spurge, small’s milk pea, crenulate lead plant, Blodgett’s silver bush, Florida prairie clover, sandflax, tiny polygala, Florida bully, and Carter’s Sandflax are plant species listed under the endangered species act that are found in the pine rockland in Miami-Dade County. Additional plant species listings include Florida Bristle Fern (in rockland hammocks) and coastal upland plants: fragrant prickly apple, beach jacquemontia, and Florida semaphore cactus. Those portions of the study area containing hammocks and pine rocklands are likely to contain the designated upland plants typical of those areas.

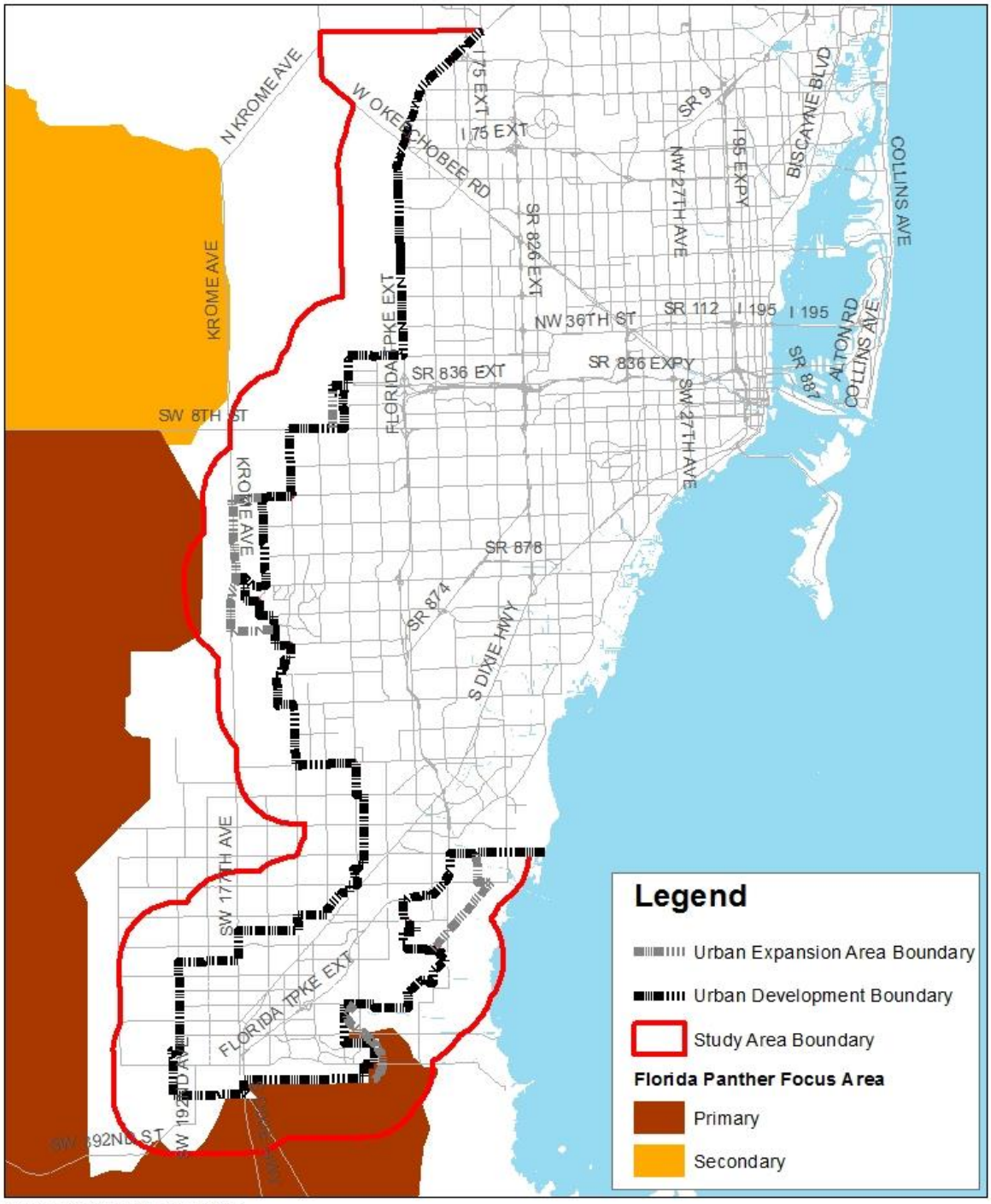
Critical habitat for the Florida brickell bush and Carter’s Sandflax was designated in 2015 and is depicted on Figure 7. In 2020, the US Fish and Wildlife Service issued proposed rulemaking to designate critical habitat for the Florida Bristle Fern. The extent of the proposed designated habitat is depicted on Figure 7.



* Source: US Fish and Wildlife Service

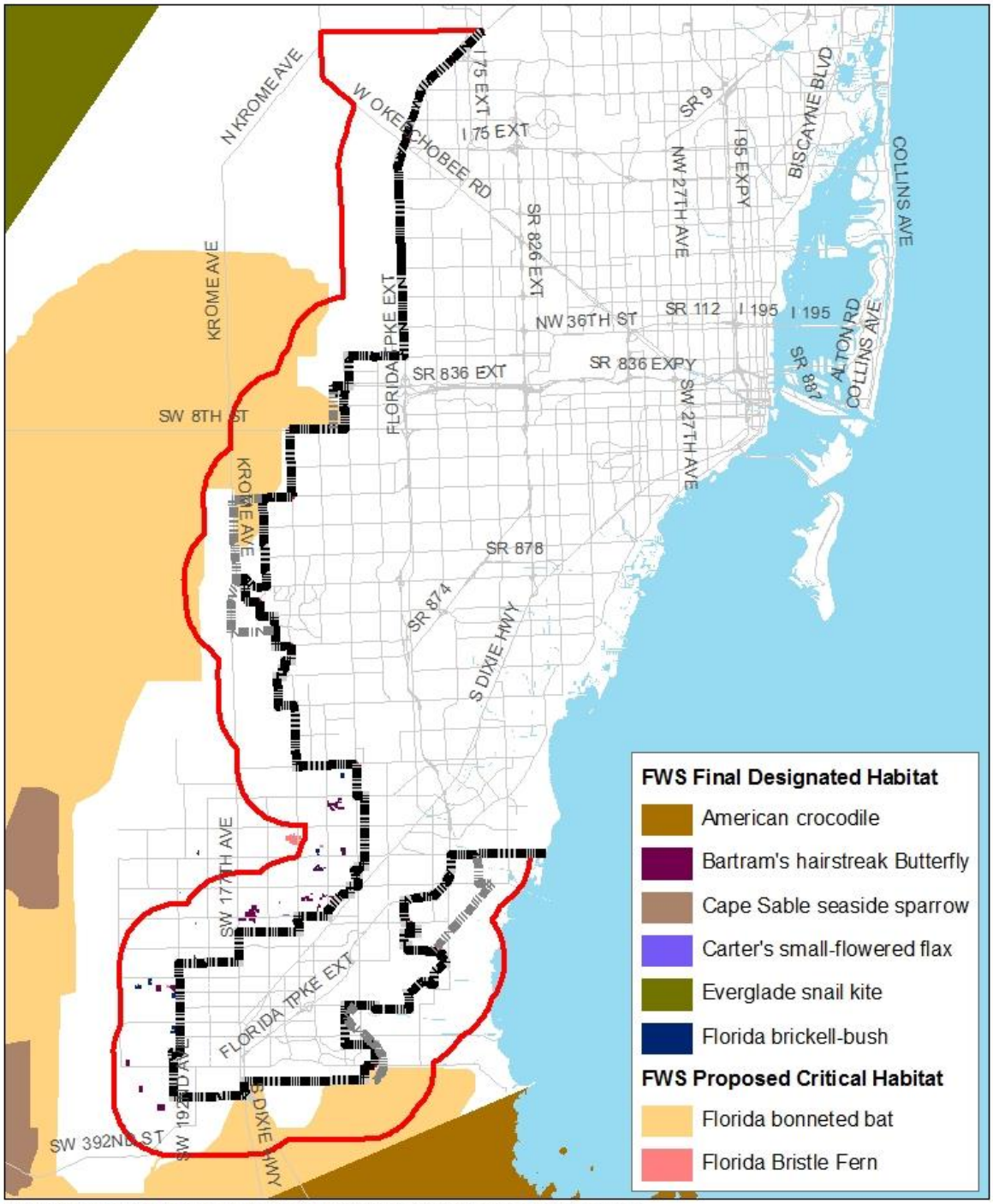
Figure 5

Wood Stork Considerations Map



* Source: US Fish and Wildlife Service

Figure 6
Florida Panther Focus Areas



* Source: US Fish and Wildlife Service (FWS) - only resources located outside of the UDB are depicted

Figure 7

Federal Designated Critical Habitat

III. Aquifer Recharge and Wellfield Protection

The Biscayne Aquifer is a highly transmissive unconfined aquifer that serves as the County's primary source of drinking water. Recharge of the Biscayne Aquifer occurs throughout the County but is greatest in undeveloped areas with high infiltration rates and abundant precipitation. Due to the importance of these areas, Objective CON-4 states that the "aquifer recharge and water storage capacity of the presently undeveloped areas in western and southern Miami-Dade County shall be maintained or increased." Since urban uses change the water quality and timing of runoff when compared with open land, Policy CON-5F requires cut and fill criteria in order to "protect natural hydrological characteristics of the basins, protect against flooding of developed land in the basins and downstream, and ensure continued proper recharge of groundwater supplies". The SFWMD identifies areas displaying infiltration rates greater than or equal to 42 inches/year as prime recharge areas. Figure 8 depicts aquifer recharge potential, which includes prime recharge areas and average precipitation rates.[13]

The County's water supply system includes eight major Biscayne Aquifer wellfields and twelve minor water supply wells (located in south Miami-Dade County). In addition, there is one wellfield located in the County that serves Monroe County, the Florida Keys Aqueduct Authority. The characteristics of the Biscayne Aquifer make it highly vulnerable to contamination from activities on the land surface. The Miami-Dade County Board of County Commissioners has adopted ordinances that establish wellfield protection zones in response to the documented association between land use and groundwater contamination. These ordinances prohibit land uses that use, handle, generate, dispose of or store hazardous materials and hazardous waste within wellfield protection areas.

To protect water quality at the County's wellfields, Chapter 24 also includes limitations on sewage loading within the wellfield travel time contours which are based, in part, on generalized survival times of bacteria and viruses in soils and groundwater. These restrictions may limit the amount of development that can be achieved on a given site. For example, land uses within the 10 day travel-time of a wellfield protection area that are served by public sanitary sewers are subject to a sewage loading restriction of 850 gallons per day (gpd) per acre. Based on Chapter 24-43.1 of the Code of Miami-Dade County, sewage flows for a single family residence are estimated to be 210 gpd/unit. This would allow for a maximum of 4 units per acre within the 10-day travel-time contour.

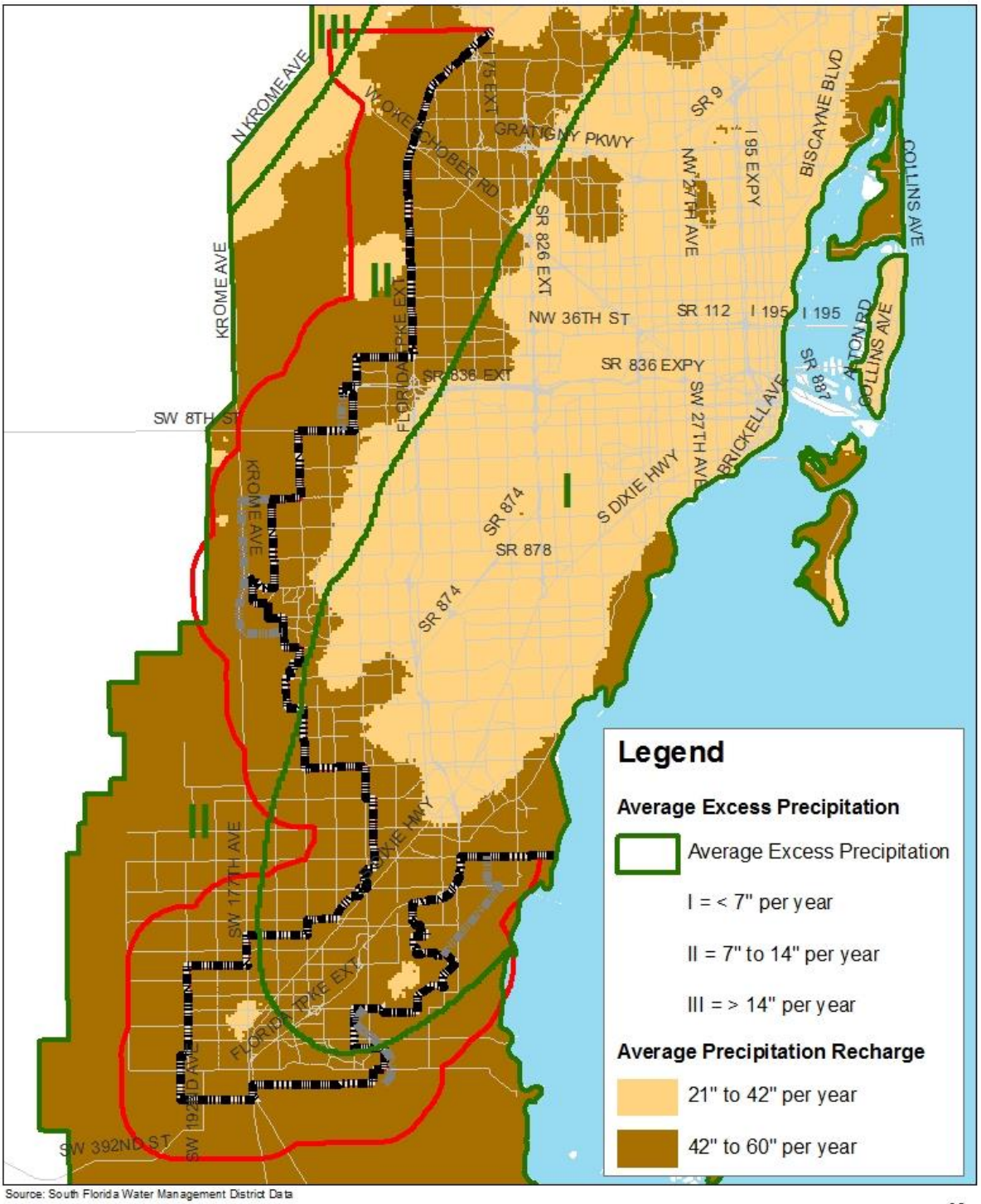
The adopted wellfield protection areas are depicted on Figure 9. Miami-Dade County is in the process of developing new groundwater flow and transport models for the Northwest and West Wellfield Protection Areas of Miami-Dade County which will form the basis for revising the travel time and drawdown contours for these wellfields and updating the wellfield protection area maps. The four wellfields located in or near the Study Area are described below:

1) **Northwest Wellfield (NWWF).** The Northwest Wellfield is a major source of drinking water for Miami-Dade County. It consists of fifteen wells, with the installed design capacity for up to 225 MGD. Land uses and activities within the cone of influence from the wellheads have the potential to directly impact the quality of water ultimately withdrawn from the

[13] Figure 8 is derived from SFWMD Technical Publication 95-02: Mapping Recharge Throughout the South Florida Water Management District. Excess Precipitation, as depicted on Figure 8, reflects the difference between long-term average annual rainfall and actual evapotranspiration data.

wells. The CDMP affords a high level of protection for the Northwest Wellfield recognizing that this wellfield provides the opportunity to maintain pristine water quality since the area within the full extent of the cone of influence is largely undeveloped (CDMP, Page I-78). CDMP Policy CON-3E states that the entire area west of the Turnpike, north of NW 25th Street and south of Okeechobee Road shall remain unurbanized.

2) **West Wellfield (WWF).** The West Wellfield was originally proposed as a 140 MGD wellfield. However, due to concerns regarding the impact of wellfield drawdown on hydrologic resources of Everglades National Park, a Memorandum of Understanding between the County, SFWMD, FDEP and the US Department of the Interior was executed to limit withdrawals at the West Wellfield to a peak pumpage of 40 MGD, provided the authorized withdrawal meets the applicable criteria pursuant to Chapter 373, Florida Statutes. However, the County may request additional allocation upon satisfactorily demonstrating that the additional pumpage will have no adverse impacts to Everglades National Park. The County is permitted under the current 20-year Water Use Permit (#13-00017-W) to withdrawal 15 MGD from the Biscayne Aquifer at the West Wellfield.
3) **Everglades Labor Camp (ELC).** Everglades Labor Camp is part of the South Dade Water System which serves a population of approximately 43,207. It has an installed design capacity of 5.04 MGD.
4) **Florida Keys Aqueduct Authority (FKAA).** The Florida Keys Aqueduct Authority (FKAA) has supply wells, a treatment facility and a transmission main in southern Miami-Dade County. The facilities provide service to Monroe County and do not serve Miami-Dade.



Source: South Florida Water Management District Data

Figure 8
Aquifer Recharge Potential

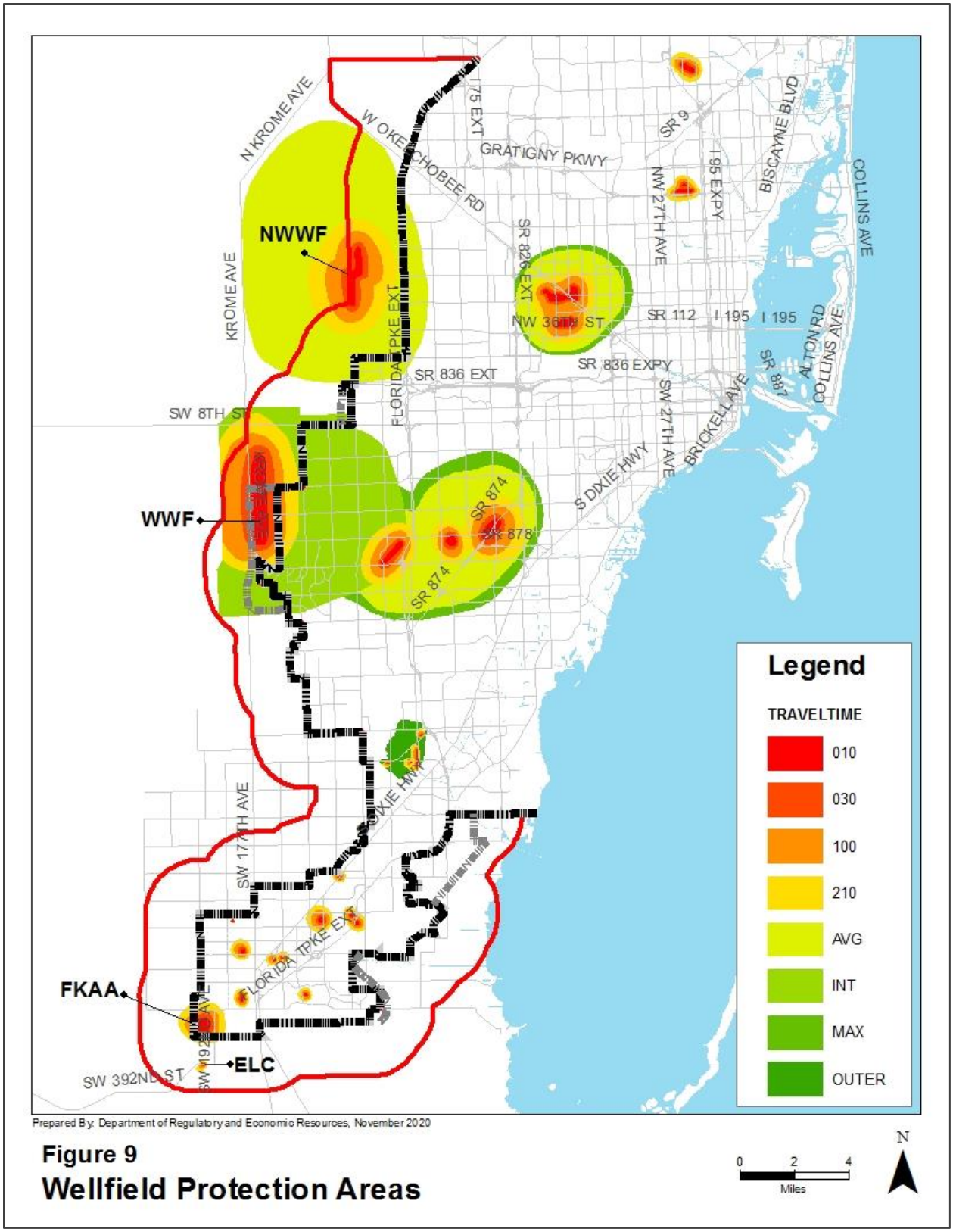


Figure 9
Wellfield Protection Areas

IV. Agricultural Suitability

South Florida's subtropical climate allows for year-round production of tropical fruits, tropical vegetables and ornamentals which provides a unique agricultural advantage. Agriculture employment and output adds to the economic diversity of Miami-Dade County's economy. It creates jobs and at the same time is part of a base economy that generates millions of dollars. Miami-Dade County is currently second in the state in terms of market value of agricultural products sold at $837,734,000.[14] In 2018, the agriculture sector had 11,329 jobs and generated $1.45 billion in GDP (Gross Domestic Product). This accounted for 0.7% of total private-sector jobs and 0.6% of total private-sector GDP in the County.[15]

Given the importance of agriculture to the local economy, the policies of the CDMP have long supported agriculture as a viable economic use of suitable lands (CDMP, Page I-73). Further CDMP Policy LU-1R states, in part, that Miami-Dade County shall take steps to reserve the amount of land necessary to maintain an economically viable agricultural industry. A 2002 study by the Miami-Dade County Planning Division found that 52,000 acres are needed to maintain an economically viable agriculture industry. There are approximately 64,287 acres identified as Farmland of Unique Importance by the U.S. Department of Agriculture, Natural Resources Conservation Service (NRCS) within the area designated "Agriculture" on the CDMP Land Use Plan Map. Within this area, parcels with an agricultural classification from the Miami-Dade County Property Appraiser comprise approximately 53,000 acres. This figure is important because it represents the properties that contain agricultural uses within the area best suited for agricultural production due to the soil capacity and land use. The remaining acreage within the area identified as Farmland of Unique Importance may be used for purposes other than agriculture or in public ownership. However, it is important to note that the data used in the 2002 study is twenty years old. The County would benefit from an update utilizing more current data.

<u>Farmland of Unique Importance</u>

The U.S. Department of Agriculture, NRCS identifies areas that are considered important farmlands and classifies them as Prime Farmland and Farmland of Unique Importance. Prime farmland is land that has the best combination of physical and chemical characteristics for meeting the Nation's food supply. The NRCS classifies Farmland of Unique Importance as land other than prime farmland that is used for the production of specific high-value food and fiber crops such as tree nuts, fruits, and vegetables.[16] It is commonly identified in areas where there is a special microclimate.[17] There are no areas within Miami-Dade County that are identified as Prime Farmland, however, land with the following five soil types are classified as Farmland of Unique Importance by NRCS: 1) Biscayne gravelly marl, drained; 2) Perrine marl, drained; 3) Krome very gravelly loam; 4) Biscayne marl, drained; and 5) Chekika very gravelly loam.

[14] United States Department of Agriculture. Census of Agriculture. 2017

[15] Miami-Dade County Department of Regulatory and Economic Resources, Planning Research Section.

[16] Federal Register Vol. 43, No.21, January 31, 1978

[17] United States Department of Agriculture, Natural Resources Conservation Service. Accessed online at: https://efotg.sc.egov.usda.gov/references/Delete/2014-12-6/FL686_Prime_and_other_Important_Farmlands--Miami-Dade_County_Area_Florida.pdf

Descriptions of these soils and their suitability for agricultural production are included in Appendix 3. The location of these soils is shown on Figure 10.

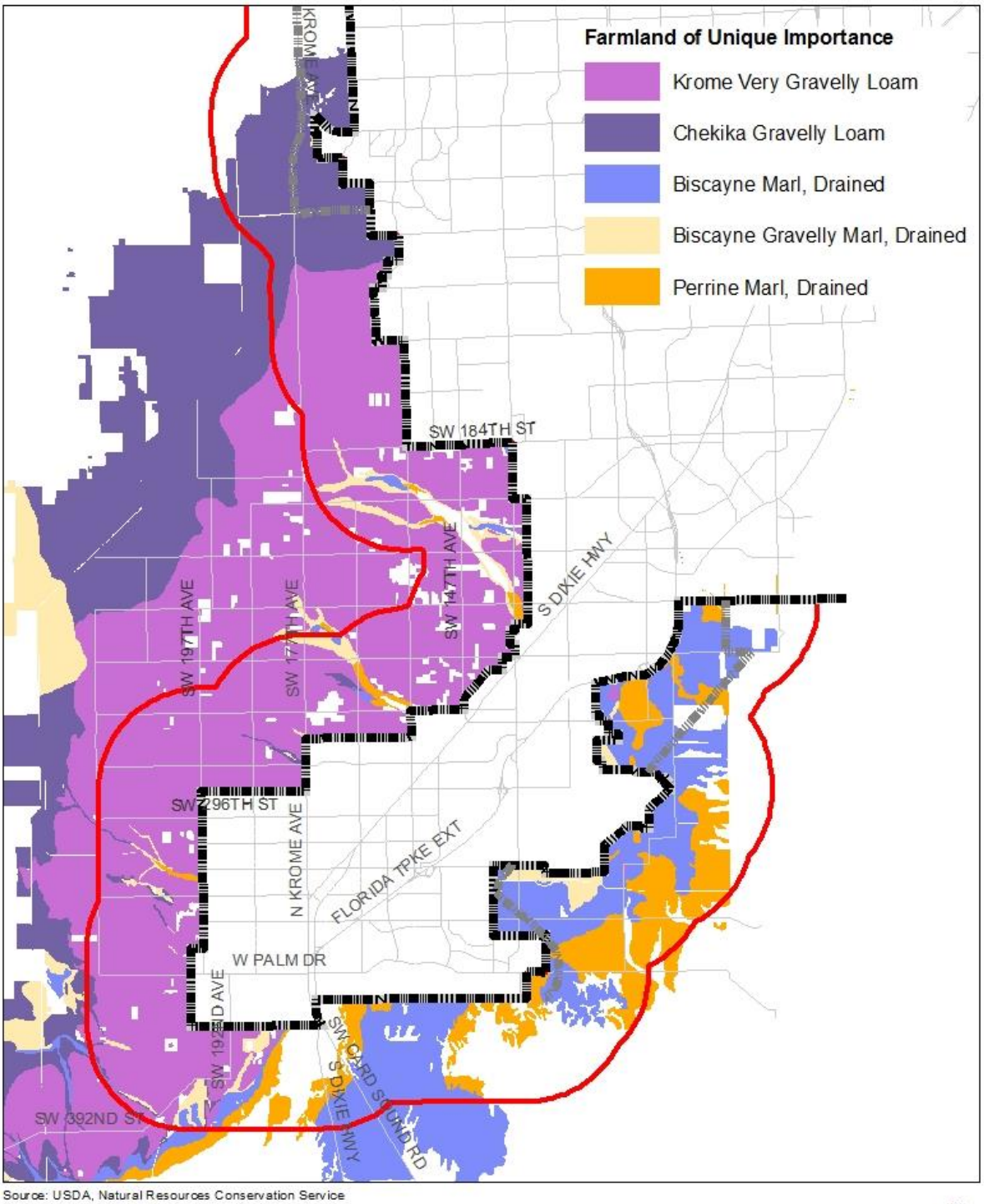
Agricultural Land Characteristics and Trends

There are approximately 64,287 acres of land that are identified as Farmland of Unique Importance in the area designated "Agriculture" on the CDMP Land Use Plan Map. Parcels with an agricultural classification from the Miami-Dade County Property Appraiser comprise approximately 53,000 acres.[18] Parcels with an existing residential land use that do not have an agricultural classification comprise approximately 4,500 acres. These areas are identified on Figure 11.

The total acres outside of the Urban Development Boundary with an agricultural classification from the Miami-Dade County Property Appraiser has decreased by 3,026 acres between 2011 and 2019. Generally, the number of farms in Miami-Dade County have been increasing since 1992 while the size of farms has been decreasing.[19]

Lot sizes within the agricultural area vary greatly. The average lot size of parcels with an agricultural classification north of SW 184th Street is 23.3 acres. For the area between SW 184th Street and SW 296th Street, the average lot size is 6.6 acres. South of SW 296th Street, the average lot size is 9.6 acres. In the East Glade area (south and east of the Urban Development Boundary), the average lot size is 24 acres.

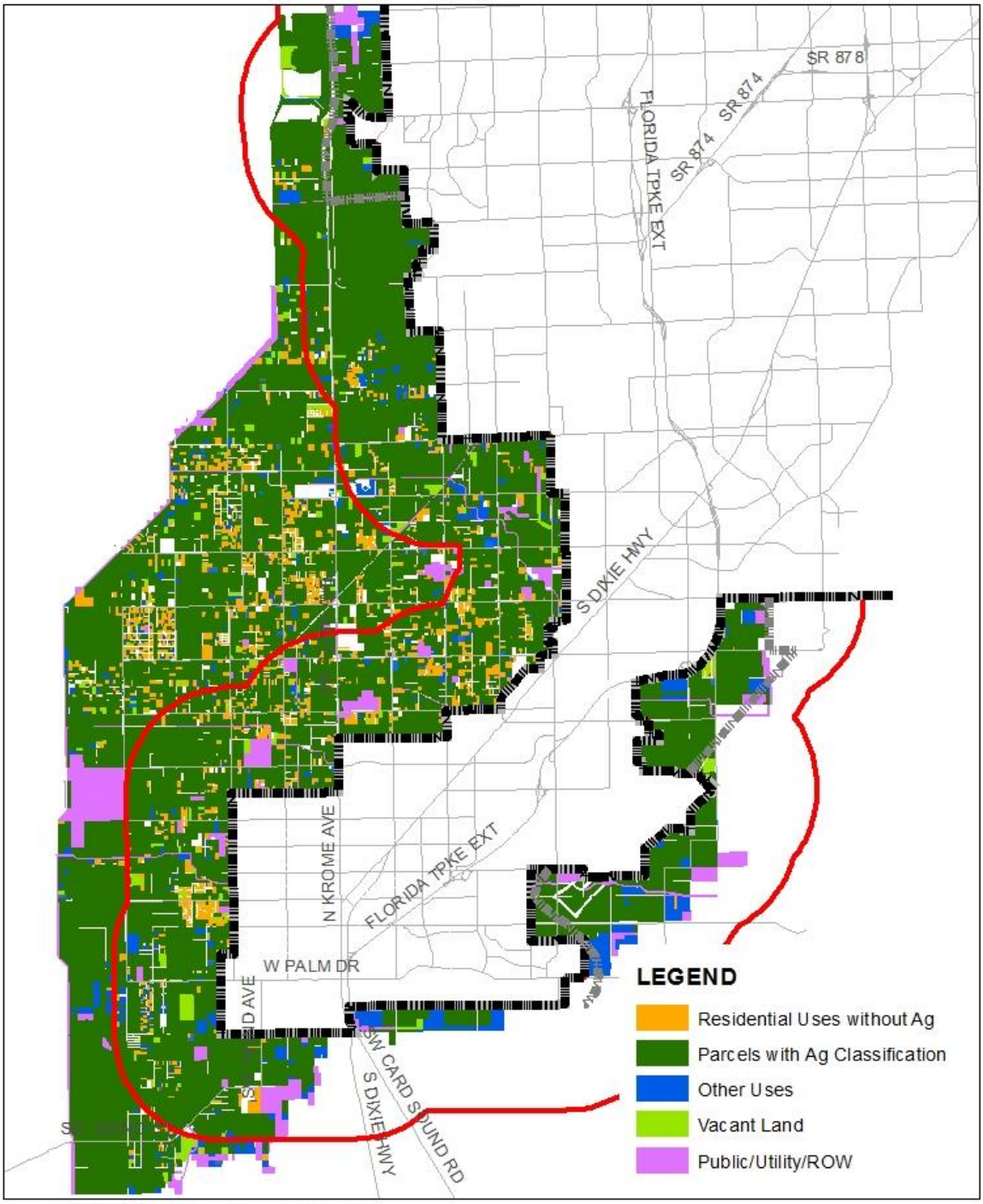
[18] This includes the total lot size for parcels with an agricultural classification from the Miami-Dade County Property Appraiser, not the portion of the property with a bona fide agricultural use.
[19] United States Department of Agriculture. 2017 Census of Agriculture.



Source: USDA, Natural Resources Conservation Service

Figure 10

Farmland of Unique Importance



Source: Miami-Dade County Property Appraiser Data, 2020

Figure 11

Land Uses in the Agricultural Area

Agricultural Commodities in Miami-Dade County

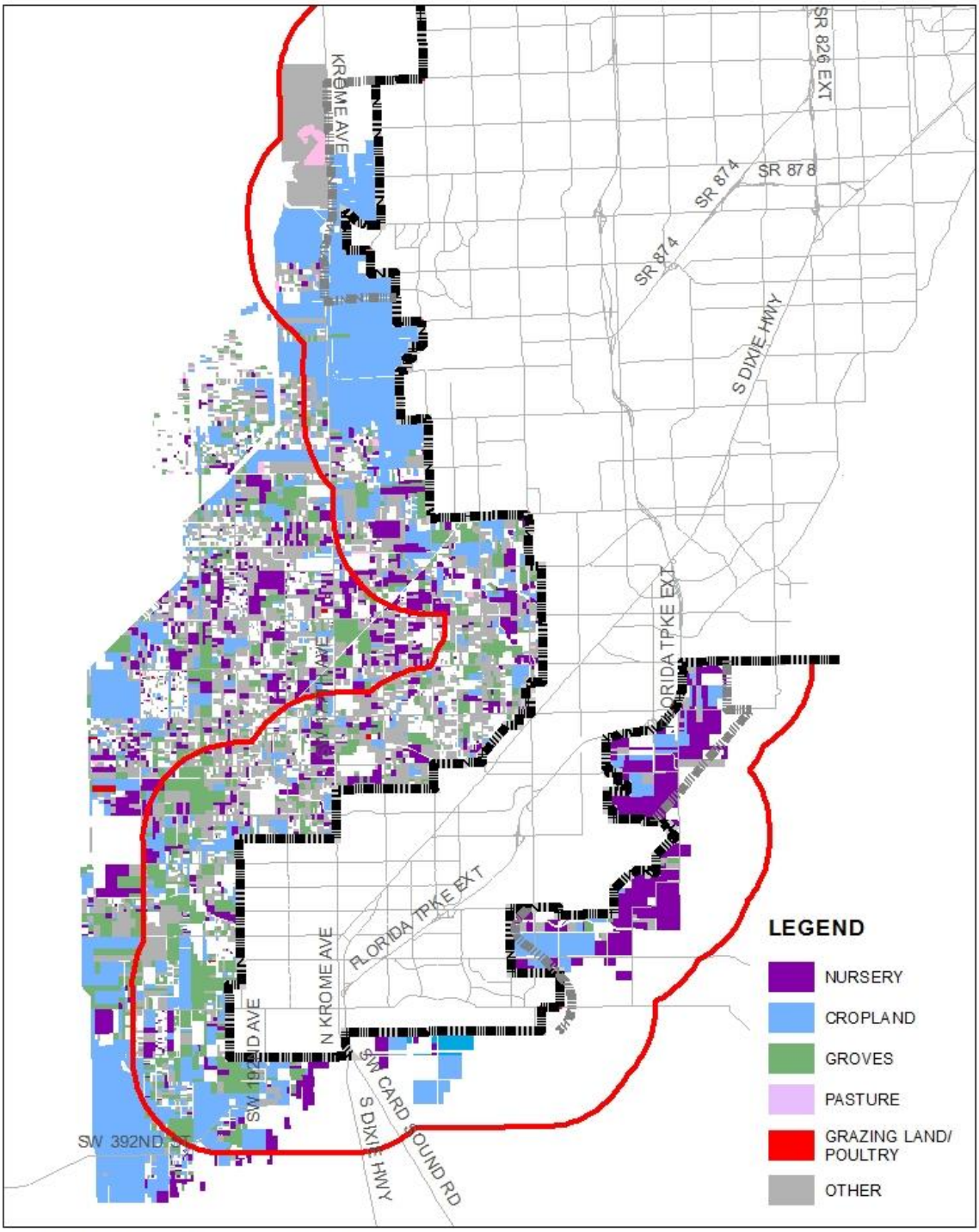
Figure 12 shows the location of agricultural commodities in Miami-Dade County. However, it should be noted that agricultural commodities on a given site can change seasonally and over time. As shown, the primary areas for cropland in the County include the area west of Miami Executive Airport and south near Ingraham Highway. The Redland agricultural area contains a mix of cropland, groves, nurseries and pasture. Both of these areas are underlain by loam soils. The East Glade area, which is underlain by marl soils, primarily contains nurseries and cropland.

Table 5 shows the acres harvested for the main crops and fruits cultivated in Miami-Dade County based on the 2017 Census of Agriculture and the change in acreage since 2012. Primary agricultural commodities in Miami-Dade County include Snap Beans, Tomatoes, Squash, Sweet Corn, Sweet Potatoes, Avocados and Mangos. Combined, these crops represented more than half of all Harvested Cropland in 2017.[20]

Table 5
Acreage Trends for Major Vegetable and Fruit Crops
Miami-Dade County

Commodity	2017 Acreage 1,000 Acres	Change from 2012 - 1,000 acres/year
Snap Beans	7.55	-0.71
Tomatoes	2.35	-0.29
Squash	1.62	-0.11
Sweet Corn	3.33	-0.38
Sweet Potatoes	3.19	N/A
Avocados	6.91	-1.17
Mangos	1.81	0.00

[20] October 2020. Agricultural Land in Miami-Dade County. Miami-Dade County Department of Regulatory and Economic Resources, Planning Research Section.



Source: Miami-Dade County Property Appraiser Data

Figure 12

Agricultural Commodities

Environmental and Land Use Considerations

The viability of agriculture in Miami-Dade County is dependent upon various issues that are beyond the scope of this study including market conditions, federal trade policies, diseases, and natural disasters. Due to the limited scope of this study, this section focuses on local conditions and policies that may affect the future viability of agricultural operations.

Land designated for agricultural uses may be further limited by environmental conditions. As Depicted on Figure 13, approximately 1,203 acres of land that are identified as Farmland of Unique Importance are located within Wetlands of Regional Significance. Formal wetland delineation would be needed to determine the exact extent and quality of jurisdictional wetlands within the area. Agricultural uses may also be limited on sites with Natural Forest Communities as depicted on Figure 13.

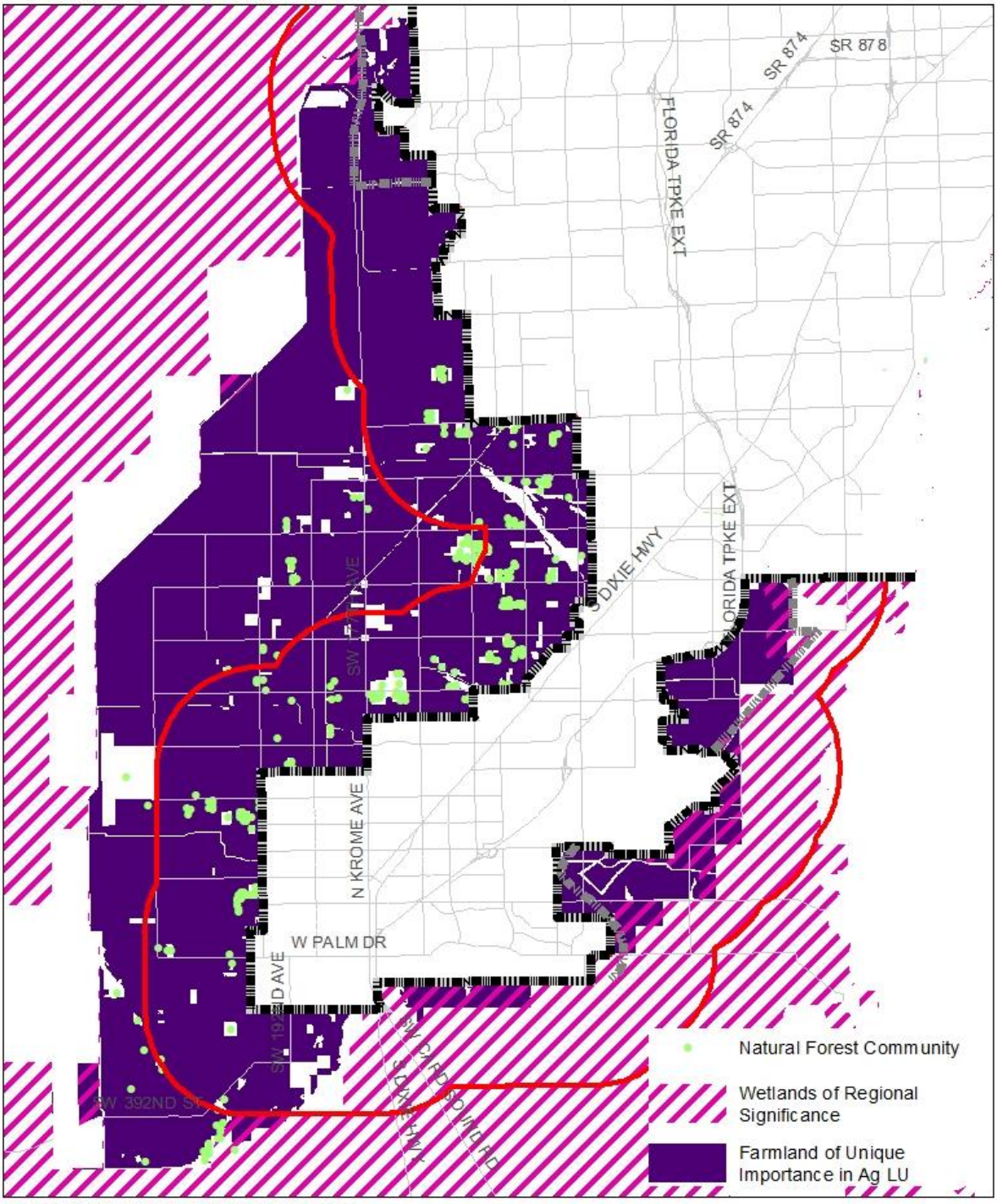
The East Glade agricultural area (east of the UDB) is made farmable by seasonal drawdowns of the water table that have occurred since 1981. The area affected by the seasonal drawdown is depicted on Figure 14. The SFWMD has identified negative impacts to Biscayne Bay as a result of the seasonal drawdown including increased salinity levels at the end of the dry season. However, without these seasonal drawdowns, there is a high probability of ground water penetrating the crop root zone for periods long enough to cause crop damage or crop loss.[21] These seasonal drawdowns may also become harder to maintain as groundwater levels increase in the East Glade area as a result of sea level rise.

Conflicts can occur where agricultural activities occur near developed areas. Conflicts primarily arise from pesticide spray drift, odor, noise, and farm traffic. These conflicts are more pronounced with large-scale vegetable production operations that rely on aerial application of pesticides. The potential for these land use conflicts is greatest where agricultural uses are immediately adjacent to moderate and high-density residential development. In addition, the conversion of agricultural land to non-agricultural land uses can increase the potential for land use conflicts.

Relevance to the Study

Currently, approximately 86% of the area identified as Farmland of Unique Importance is comprised of parcels with an agricultural classification demonstrating the suitability of the area to support agriculture. However, it is important to continue to monitor pressures that may impact the viability of farming operations such as operational changes to the East Glade seasonal drawdown and the conversion of agricultural land to non-agricultural land uses.

[21] 2010. South Florida Water Management District. Seasonal Operations Overview Presentation.



Source: USDA, Natural Resources Conservation Service

Figure 13

Environmental Considerations for Agriculture

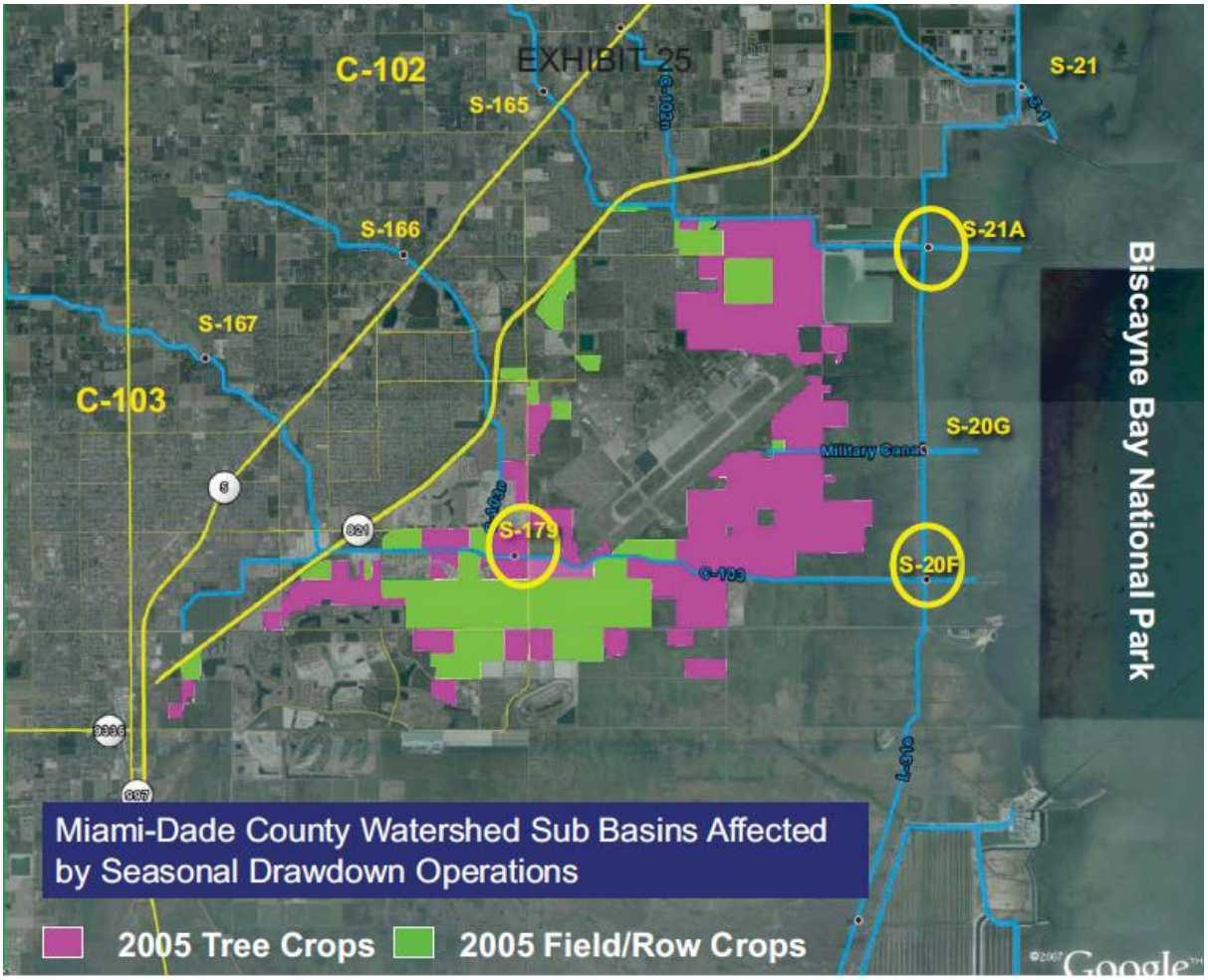


Figure 14: Watershed Sub Basins Affected by Seasonal Drawdown
Source: South Florida Water Management District (2005)

V. Military and Airport Compatibility

Homestead Air Reserve Base (HARB)

Section 163.3177(6)(a)(3)(a), Florida Statutes requires local governments' comprehensive plans to achieve compatibility of lands adjacent or closely proximate to military installations. In addition, the Miami-Dade County Zoning Code contains land use restrictions for areas proximate to airports and military installations that may impact development potential in certain areas.

Figure 15 depicts the accident potential zones and noise contours of the Homestead Air Reserve Base (HARB) as identified in the Air Installation Compatible Use Zone (AICUZ) Study prepared by the United States Air Force. The accident potential zones represent the areas with potential for aircraft accidents and are comprised of three zones; Clear Zone, Accident Potential Zone I (APZ I), and Accident Potential Zone II (APZ II). The AICUZ indicates that all land uses except agriculture are incompatible in the Clear Zones. The AICUZ indicates that residential uses and uses with large congregations of people are incompatible in APZ I and only very low density residential is compatible in APZ II.

The AICUZ also provides recommended compatible land uses for areas within the HARB noise contours which represent areas that may be impacted by aircraft noise exposure. Cumulative noise levels, resulting from multiple single events, are used to characterize community noise effects from aircraft operations and are expressed in A-weighted decibels (dBA). The AICUZ indicates that residential uses are incompatible in the 75dBA and greater noise contours. Residential uses are discouraged within the 65dBA to 69dBA noise contour and strongly discouraged in the 70dBA to 74dBA noise contour. Where residential uses are permitted, the AICUZ recommends that measures be included to achieve outdoor to indoor noise level reduction.

Chapter 33, Article XXXV (Homestead Air Reserve Base Zoning) of the Miami-Dade County Code regulates land uses proximate to Homestead Air Reserve Base (HARB). Section 33-295 prohibits buildings with large congregations of people including schools, hospitals, apartment buildings, and religious facilities within the Accident Potential Zones and the 75 dBA and greater noise contours. Further, residential uses at densities greater than 1 dwelling unit per 5 acres are prohibited in the 75 dB DNL and greater noise contour zones. Outdoor to indoor noise level reduction is required for residential uses located within the noise contour zones. The HARB Accident Potential Zones are also identified as areas that shall not be considered for expansion of the UDB pursuant to Policy LU-8G.

Airport Land Use Compatibility

A portion of the Study Area includes areas subject to airport compatibility restrictions for Miami Executive Airport and Miami Homestead General Aviation Airport. Article XXXVII (Airport Zoning) governs County owned and managed airports. The land use compatibility restrictions contained in Section 33-333 assure compatible land uses in the areas surrounding these airports and compliance with Chapter 333, Florida Statutes, which addresses airport hazards and the incompatible use of land in airport vicinities.

- ***Runway Protection Zones (RPZ).*** The following uses are prohibited in the RPZ: (1) Within the RPZ, new stormwater retention/detention facilities shall be permitted, following receipt of an opinion from the FAA. All other new buildings and structures, recreational uses, transportation facilities, fuel storage facilities, hazardous material storage, wastewater treatment facilities, and above-ground utility infrastructure proposed to be located within the RPZ shall only be permitted after review and approval by MDAD to assure compatibility with airport operations, following receipt of an opinion from the FAA. (2) Uses prohibited in the Outer Safety Zone (OSZ) and Critical Approach Zone (CAZ) shall also be prohibited in the RPZ. (3) In no event shall these prohibitions be varied.
- ***Outer Safety Zone (OSZ).*** The following uses are prohibited in the OSZ: (1) Within the OSZ, new residential construction, educational facilities, hospitals, religious facilities, and other buildings for public assemblage, shall be prohibited. In no event shall these prohibitions be varied with respect to Miami International Airport. It is provided, however, that aviation-related schools, hotels and motels and their ancillary uses, and structures used in connection with public transportation shall not be subject to this prohibition. (2) Uses prohibited in the Critical Approach Zone (CAZ) shall also be prohibited in the OSZ.
- ***Critical Approach Zone (CAZ).*** The following uses are prohibited in the CAZ: (1) Hospitals, stand-alone emergency rooms, urgent care facilities, skilled nursing facilities, assisted living facilities, adult day care facilities, day nurseries, and educational facilities, excluding aviation-related schools are prohibited. In no event shall the prohibition on educational facilities be varied. (2) Establishments or uses that emit smoke, gases, or dust in quantities or densities sufficient to jeopardize the safe use of the airport. In no event shall these prohibitions be varied. (3) Establishments or uses that create electrical interference with radio communications between the airport and aircraft; make it difficult for aircraft pilots and tower control operators to distinguish between airport lights, aircraft and others; result in glare in the eyes of aircraft pilots using the airport, or tower control operators; impair visibility in the vicinity of the airport; or otherwise endanger the landing, taking off, or maneuvering of aircraft. In no event shall these prohibitions be varied. (4) Landfills, as defined in Section 403.703, Florida Statutes; and any associated uses that attract or sustain birds and bird movements. In no event shall these prohibitions be varied.
- ***Noise Compatibility Restriction Zones (NCRZ).*** The following restrictions apply within the NCRZ: (1) New residential construction and educational facilities, excluding aviation-related schools, are prohibited within the 75 DNL Zone. (2) All new uses in the 65 to 74 DNL Zone shall incorporate at least a 25 decibel outdoor-to-indoor Noise Level Reduction (NLR) into design and construction. For Miami Homestead General Aviation Airport, new residential construction and educational facilities, excluding aviation-related schools, are prohibited within the full extent of the noise contour depicted on Figure 15.

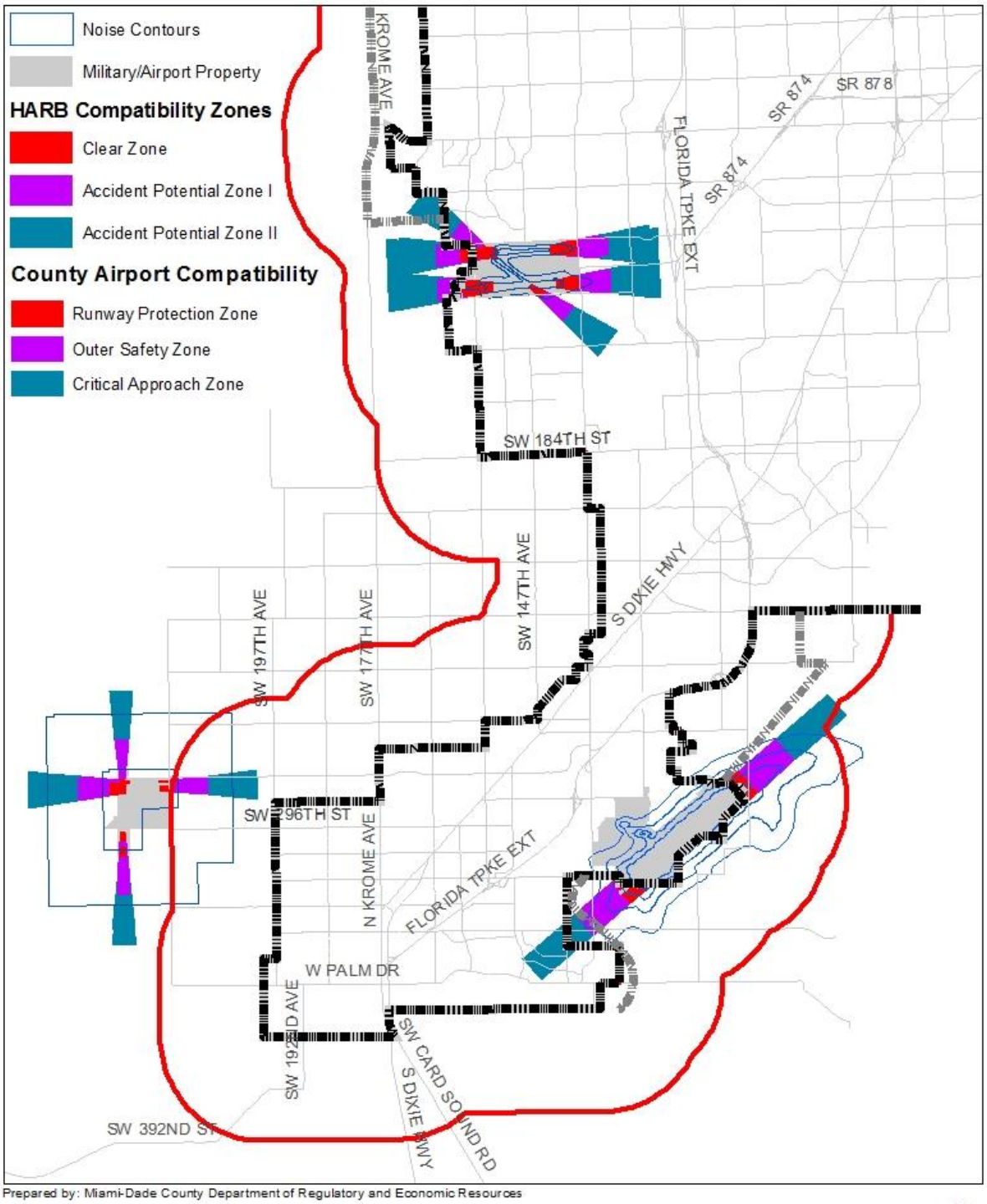


Figure 15

Military and Airport Compatibility

VI. Rockmining Considerations

The Lake Belt is a 77.5 square mile area in northwestern Miami-Dade County that was established by the Florida Legislature in 1997 to provide a comprehensive plan for limestone extraction. The limestone mined in the Lake Belt is used for construction of buildings, roads, and infrastructure. The Lake Belt provides approximately one-half of the total limestone demand in the State of Florida.[22] Major mines located within the Lake Belt are depicted on Figure 16. The Lake Belt area, as defined in state law, is depicted on Figure 17.

The Lake Belt Report and Plan Phase I (1997) identified specific areas for mining within the County, provided recommendations for streamlining the permitting process and a strategy for wetland mitigation. Areas identified in the report for wetland mitigation include the Pennsuco and Bird Drive wetlands. The recommendations of the report are adopted by reference into state law and form the basis for the lake belt provisions contained in s. 373.4149, Florida Statutes which are summarized in Table 6.

Key provisions of state law related to the Lake Belt area include the requirement that amendments to local comprehensive plans located within one mile of the Lake Belt be compatible with limestone mining activities and that Miami-Dade County strongly consider limestone mining activities and ancillary operations (i.e., lake excavation, use of explosives, rock processing, cement, concrete and asphalt products manufacturing) when amending local comprehensive plans. State law also prohibits amendments to the local comprehensive plan for residential uses in a specified area of the County (as depicted on Figure 17) until there is no active mining within two miles.

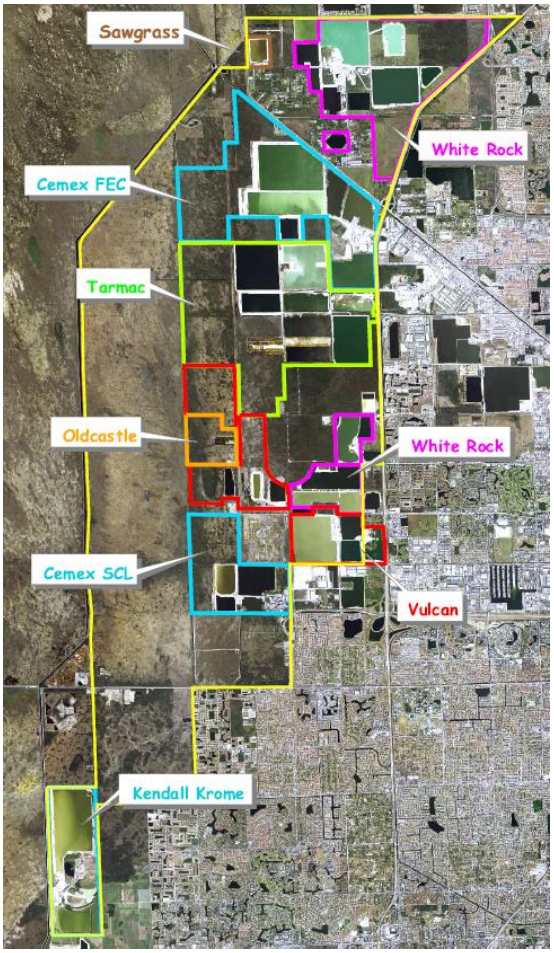


Figure 16: Major Mines in Lake Belt
Source: Alan Whitehouse, FDEP Mining and Mitigation Program

Table 6: Rockmining Considerations

State Law (Florida Statutes)

s. 373.4149(4), Florida Statutes. The identification of the Miami-Dade County Lake Belt Area shall not preempt local land use jurisdiction, planning, or regulatory authority in regard to the use of land by private land owners. When amending local comprehensive plans, or implementing zoning regulations, development regulations, or other local regulations, Miami-Dade County shall strongly consider limestone mining activities and ancillary operations, such as lake excavation, including use of explosives, rock

[22] South Florida Water Management District Lake Belt Mitigation Committee website. Accessed on November 20, 2020 at https://www.sfwmd.gov/our-work/lake-belt-committee.

processing, cement, concrete and asphalt products manufacturing, and ancillary activities, within the rock mining supported and allowable areas of the Miami-Dade County Lake Belt Plan adopted by subsection (1); provided, however, that limerock mining activities are consistent with wellfield protection. Rezonings, amendments to local zoning and subdivision regulations, and amendments to local comprehensive plans concerning properties that are located within 1 mile of the Miami-Dade County Lake Belt Area shall be compatible with limestone mining activities. No rezonings, variances, amendments to local zoning and subdivision regulations which would result in an increase in residential density, or amendments to local comprehensive plans for any residential purpose may be approved for any property located in sections 35 and 36 and the east one-half of sections 24 and 25, Township 53 South, Range 39 East until such time as there is no active mining within 2 miles of the property. This section does not preclude residential development that complies with current regulations.

Policy CON-6A of the CDMP states that "Areas of highest suitability for mineral extraction in Miami-Dade County shall be reserved for that use and shall be protected from encroachment by incompatible uses." To that end, CDMP Policy CON-3E states that "The area west of the Turnpike, east of the Dade-Broward Levee, north of NW 12th Street and south of Okeechobee Road shall be reserved for limestone mining and approved ancillary uses as provided for in Chapters 24 and 33 of the Miami-Dade County Code and the entire area west of the Turnpike, north of NW 25th Street and south of Okeechobee Road shall remain unurbanized." The CDMP indicates that limestone quarrying and ancillary uses may be considered for approval within Open Land Subareas 1, 2 (in keeping with the Northwest Wellfield Protection Plan and environmental regulations), 3 and 5 as identified in the CDMP Land Use Element.

Miami-Dade County further defines the area where rockmining uses are permitted in Article XLI of the Code which identifies the Rockmining Overlay Zoning Area (ROZA) as depicted on Figure 17. The Rockmining Overlay Zoning Area is within the area designated Open Land on the CDMP Land Use Plan Map and specifically within Open Land Subarea 1, 2 and 3. Within the ROZA, rockmining uses are permitted in all zoning districts without a public hearing, subject to compliance with specified criteria. Rockmining uses are not permitted in any other area of unincorporated Miami-Dade County unless approved after public hearing pursuant to the unusual use criteria contained in the County Code and consistency with the CDMP.

The use of explosives associated with rockmining activities can have negative impacts on nearby structures and cause human distress. Section 552, Florida Statutes vests regulation of the use of explosives for limestone extraction solely and exclusively with the State Fire Marshal. The rules governing ground vibration limits for construction materials mining activities are contained in Chapter 69A-2.024 of the Florida Administrative Code. The ground vibration limits are generally based on the particle velocity and frequency.[23] However, the use of explosives within two miles of a residential subdivision containing 25 or more occupied residences within the urban development boundary, is not permitted to exceed a peak particle velocity of more than 0.5 inches per second. Vibration at this level was found to be generally tolerable to about 95% of people perceiving it as distinctly perceptible and reduces the risk for structural damage.[24]

[23] Limits referenced in Ch. 69A-2.024 FAC are contained in the United States Bureau of Mines Report of Investigations No. 8507.

[24] United States Bureau of Mines. Report of Investigations No. 8507. Structure Response and Damage Produced by Ground Vibration from Surface Mine Blasting

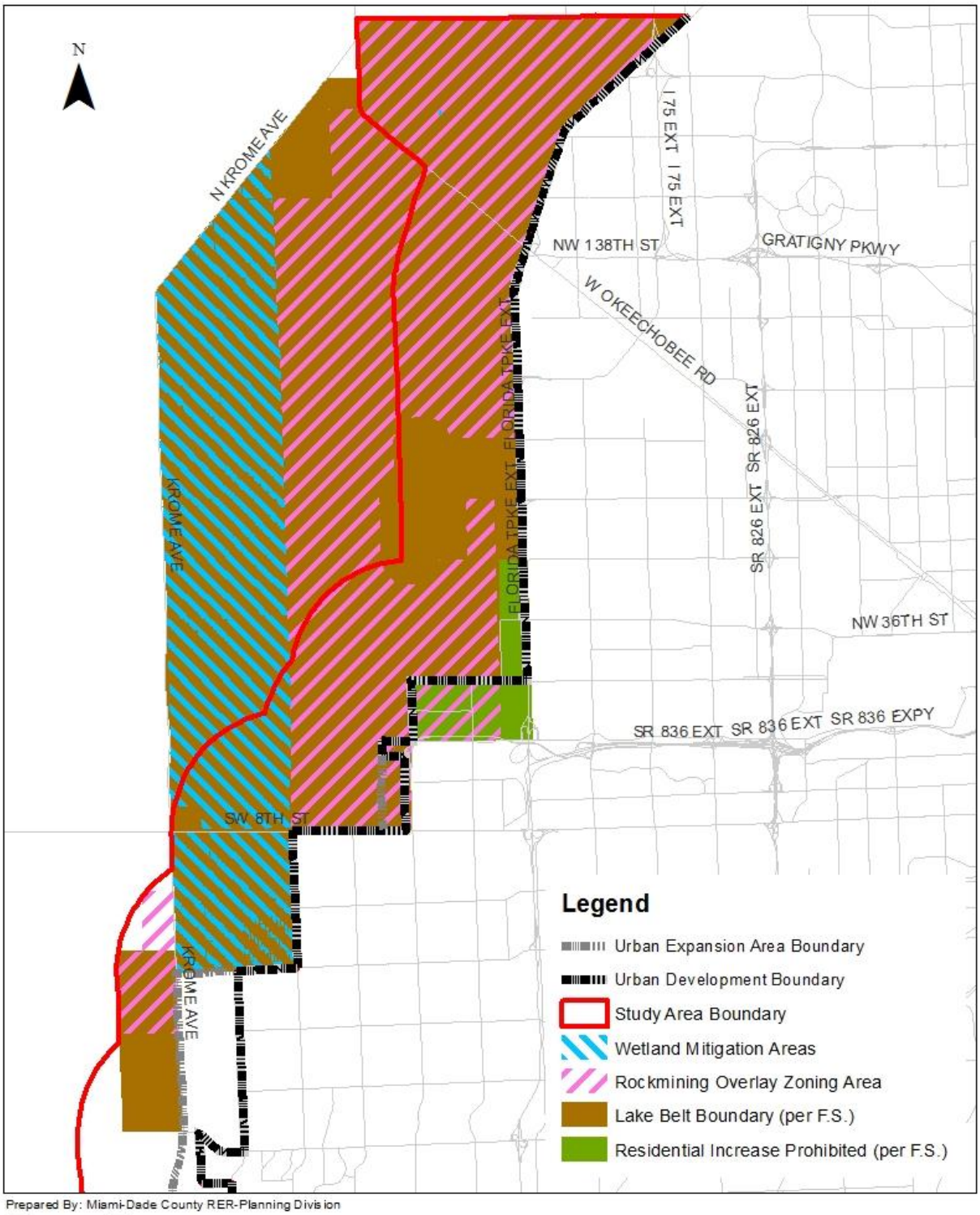


Figure 17

Rockmining Considerations Map

VII. Vulnerability to Flooding and Natural Disasters

The region's current land development pattern and unique geophysical and socioeconomic conditions lead to a broad and heightened level of exposure to the effects of climate change. Miami-Dade County's vulnerability to flooding is being compounded by rising sea and groundwater levels. Other climate change consequences may also exacerbate flood risk such as more intense tropical storms and more extreme rainfall events. The increase in flood risk also increases the County's need for infrastructure retrofitting and the cost for those measures.

Vulnerability to flooding is not only a coastal concern. Low-lying inland areas of the County are also vulnerable to flooding and rely upon the drainage provided by the South Florida Water Management District, the County, and local stormwater infrastructure to reduce flooding risks. Projects such as the C-4 basin emergency stormwater detention area are designed to manage these flooding risks. These inland areas are also expected to experience increased flooding as sea level rises due to higher groundwater levels and decreased capacity of the stormwater drainage systems. Because of these factors, maintaining the region's delicate balance of water management to serve multiple needs will likely become more challenging and expensive in the face of climate change and increased tidal flooding.

Sea level in Miami has risen approximately 10 inches since 1931, when tide gauge records began locally.[25] According to the 2019 Unified Sea Level Rise Projection published by the Southeast Florida Regional Climate Change Compact, sea levels are projected to rise between 10 and 17 inches within the CDMP long-term planning horizon of 2040 and between 21 and 40 inches by 2070. These projections are depicted on Table 7.

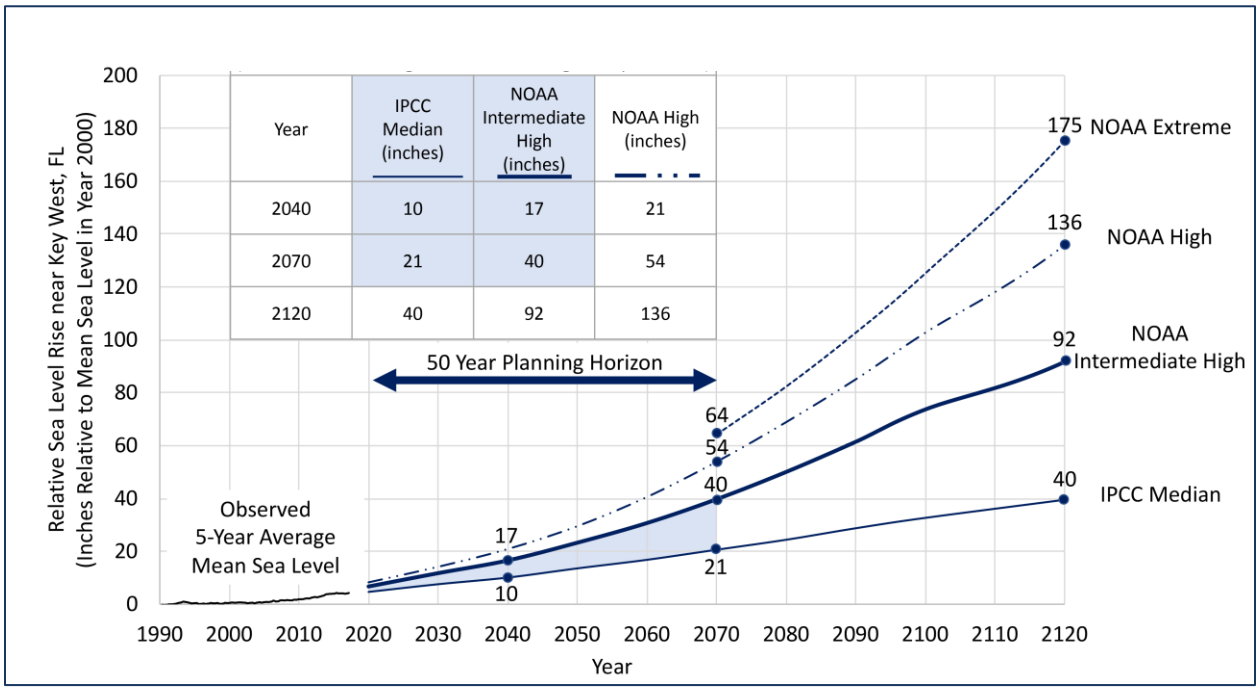


Table 7: Sea Level Rise Projections, Southeast Florida Regional Climate Change Compact (2019)

[25] Sea Level Trends - NOAA Tides & Currents (the observed change in 2.92 mm/year over a period of 89 years)

The County has completed multiple studies of the potential impact of sea level rise on existing infrastructure systems such as roadways, septic systems, sewer infrastructure, and stormwater systems.[26] While these risks are manageable, all previous reports have indicated that rising water levels will require existing infrastructure to be modified or replaced. The pace of repairs, improvements, and replacements is likely to increase as sea level rise increases.

The Urban Land Institute worked with the Southeast Florida Climate Change Compact to analyze the business case for resilience in the region which included Miami-Dade County, Broward County, Palm Beach County, and Monroe County.[27] The graph below in Table 8 shows the estimated property tax revenues that could be lost over the next half century, based on property identified to be vulnerable to permanent sea level rise and the modeled daily high-tide conditions from the Unified Sea Level Rise Projection. The analysis identified Miami-Dade County as most vulnerable of the four counties in the study to property tax revenue loss out to 2070 with a total loss of approximately $1.345 billion. This study illustrates that Miami-Dade County will need to carefully consider how and where future development expansion is allowed or encouraged since there is already a substantial amount of the County's tax revenue base at risk to impacts of sea level rise.

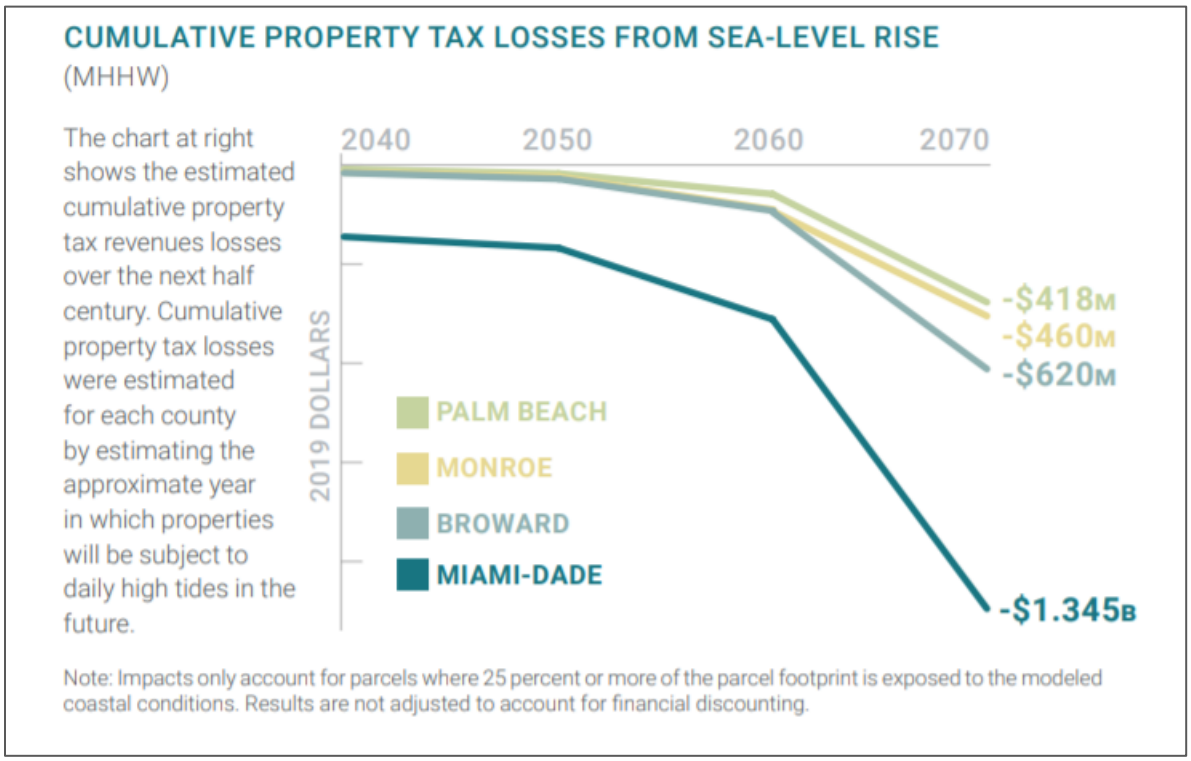


Table 8: Estimated cumulative property tax revenue loss by County out to 2070 (ULI 2020)

[26] Miami-Dade County Office of Resilience. Accessed online at: https://www.miamidade.gov/global/economy/resilience/home.page
[27] Urban Land Institute. The Business Case for Resilience in Southeast Florida: Regional Economic Benefits of Climate Adaptation. Washington, DC: Urban Land Institute, 2020. Accessed online at: https://knowledge.uli.org/-/media/files/research-reports/2020/the-business-case-for-resilience-in-southeast-florida_final.pdf?rev=81609c7f6b72479d89c49aff72fea446&hash=FB2E953B8A456CFE781169A0CAA82333

Floodplain Management. The Flood Insurance Rate Maps (FIRMs) prepared by the Federal Emergency Management Agency (FEMA) provide the foundation for the National Flood Insurance Program (NFIP) regulations and flood insurance requirements. It is expected that FEMA will release updated FIRMs for Miami-Dade County in 2021. The Code of Federal Regulations, Chapter 44, Part 60 sets forth the minimum criteria local governments must follow in order to be eligible for flood insurance through the NFIP. Miami-Dade County implements standards that meet or exceed the criteria contained in 44 C.F.R. Part 60 through the CDMP, Chapter 11C (Development within Flood Hazard Districts), Chapter 24 (Environmental Regulations), and Chapter 8 (Building Code) of the County Code which adopts the Florida Building Code and addresses unsafe structures.

The FIRM identifies the Special Flood Hazard Area (SFHA) which is that portion of the floodplain subject to inundation by the base flood (1% annual chance) and/or flood-related erosion hazards. However, the FIRM does not depict the heightened level of flooding expected as a result of sea level rise. Floodplain management regulations must be enforced, and mandatory purchase of flood insurance applies within the SFHA. The Special Flood Hazard Areas, as defined by FEMA, are depicted on Figure 18 and described below:

- Zones A, AE and AH (Moderate to High Flooding Risk). Includes areas subject to inundation by the 1-percent-annual-chance flood event. Development in this zone must incorporate floodproofing techniques. Projects within the portion of the floodplain that conveys the majority of the floodwater, known as the floodway, must include analysis from a registered professional engineer demonstrating that the project will not increase flooding or that any increases do no impact structures on other properties. Property owners can also petition FEMA to change the floodplain designation if the property has been elevated above the base flood by the placement of earthen fill.
- Zone VE (High Flooding Risk). Areas subject to inundation by the 1-percent-annual-chance flood event with additional hazards due to storm-induced velocity wave action of 3 feet or more. Coastal waves lead to a heightened exposure to property losses and life safety risks in the VE Zone. The NFIP regulations prohibit the placement of structural fill and require that the lowest horizontal member of buildings in the VE Zone be elevated on engineered piles or columns to or above the base flood elevation. CDMP Policy LU-8G identifies the FEMA VE Zone as an area that should be avoided for expansion of the Urban Development Boundary.

FEMA also administers the NFIP Community Rating System (CRS) which is a voluntary incentive program that provides insurance premium discounts for local governments that implement floodplain management activities that exceed the minimum NFIP requirements. Unincorporated Miami-Dade County participates in the NFIP Community Rating System (CRS) Program and has achieved a Class 5 Community rating on a scale of 1 (highest) to 10 (lowest). As a result, policyholders in special flood hazard areas of the Unincorporated Municipal Service Area of the County are eligible to receive a premium discount of up to 25%. CDMP Policy CM-9H establishes the goal of achieving a Class 4 rating in the NFIP community rating system for unincorporated Miami-Dade County.

Storm Surge. Storm surge is an abnormal rise of water caused primarily by the strong winds in a hurricane or tropical storm. The winds associated with the storm produce vertical circulation in the ocean. As the storm reaches shallower waters near the coast, the vertical circulation pushes

up and inland creating storm surge that can travel several miles inland. According to the National Oceanic and Atmospheric Administration (NOAA), storm surge can result in large loss of life and cause massive destruction.[28]

NOAA models storm surge using the Sea, Lake and Overland Surges from Hurricanes (SLOSH) computerized storm surge model. In Florida, the SLOSH model outputs are further refined by the Florida Division of Emergency Management (FDEM) which takes the surge height outputs from SLOSH and compares them to local high-resolution ground elevation data. Miami-Dade County uses the SLOSH outputs, as refined by FDEM, for purposes of establishing storm surge planning zones that inform emergency evacuation decisions. The data provided by NOAA and FDEM do not account for the compounding effects of sea level rise on future storm surge depths.

State law defines the Coastal High Hazard Area as the area vulnerable to storm surge from a Category 1 storm event. CDMP Policy LU-8G identifies the Coastal High Hazard Area (CHHA) as an area that shall not be considered for expansion of the Urban Development Boundary for residential land uses due to the public safety risks of placing additional population in the CHHA. CDMP Policy CM-9A states that development and redevelopment activities in the CHHA (as well as the areas vulnerable to storm surge from a Category 3 storm event) shall be limited to those land uses that have acceptable risks to life and property and includes a series of guidelines that encourage development density and intensity to be maintained at current levels within the CHHA. These various considerations are summarized in Table 9 below. The Coastal High Hazard Area is depicted on Figure 18.

TABLE 9: Storm Surge Considerations

State Law (Florida Statutes)

Section 163.3178(2)(f), Florida Statutes requires local governments to include, development and redevelopment principles, strategies, and engineering solutions in their comprehensive plans that reduce flood risks and losses in coastal areas, which result from high-tide events, storm surge, flash floods, storm water runoff, and the related impacts of sea-level rise.

Chapter 163.3177, Florida Statutes requires local governments to incorporate policies into the Coastal Management Element that limit public expenditures that subsidize development in Coastal High Hazard Areas.

Strategic Regional Policy Plan

Goal No. 19 of the Strategic Regional Policy Plan for South Florida (2004) prepared by the South Florida Regional Planning Council states that local governments should reduce allowable residential development densities in the Coastal High Hazard Area to densities no greater than the current use of the property and require any development or redevelopment that occurs in a Coastal High Hazard Area to include features that mitigate hazard impacts and promote public safety and welfare.

Comprehensive Development Master Plan

Policy CM-9A. Development and redevelopment activities in the Coastal High Hazard Area (CHHA), and the Hurricane Vulnerability Zone shall be limited to those land uses that have acceptable risks to life and property. The basis for determining permitted activities shall include federal, State, and local laws, the pre-disaster study and analysis of the acceptability of various land uses reported in the County's Comprehensive Emergency Management Plan required by Policy CM-10A, when approved, and the following guidelines:

i. Discourage development on the CHHA, including the barrier islands and shoreline areas susceptible to destructive storm surge;

[28] National Oceanic and Atmospheric Administration. Accessed online at: https://www.weather.gov/media/owlie/surge_intro.pdf

ii. Direct new development and redevelopment to high ground along the Atlantic Coastal Ridge and inland environmentally suitable lands;
iii. Maintain, or reduce where possible, densities and intensities of new urban development and redevelopment within the Coastal High Hazard Area; to that of existing development and zoning;
iv. Prohibit construction of new mobile home parks and critical facilities in the Coastal High Hazard Area;
v. Prohibit Land Use Plan map amendments or rezoning actions that would increase allowable residential density in the FEMA "V" Zone, the CHHA or on land seaward of the Coastal Construction Control Line (CCCL) established pursuant to Chapter 161, F.S. unless it can be demonstrated that measures will be undertaken to maintain the existing evacuation period in accordance with Policy CM-8F; and,
vi. Continue to closely monitor new development and redevelopment in areas subject to coastal flooding to implement requirements of the federal flood insurance program.

Policy CM-9E. Land use approvals, or zoning or other development permits or development orders that would allow for the construction or operation of new non-water dependent industrial or business facilities that would generate, use or handle more than 55 gallons of hazardous wastes or materials per year shall be prohibited in the Coastal High Hazard Area unless demonstrated that: no suitable site exists outside of these areas and appropriate measures will be taken to prevent an accidental release during a storm event. Miami-Dade County shall take steps to ensure that existing County facilities of this type are adequately protected to prevent an accidental release during a storm event.

Policy CIE-2A. Public funds will not be used to subsidize increased overall density or intensity of urban development in coastal high hazard areas. However, public beach, shoreline access, resource restoration, port facilities or similar water-dependent projects may be constructed.

Relevance to the Study.

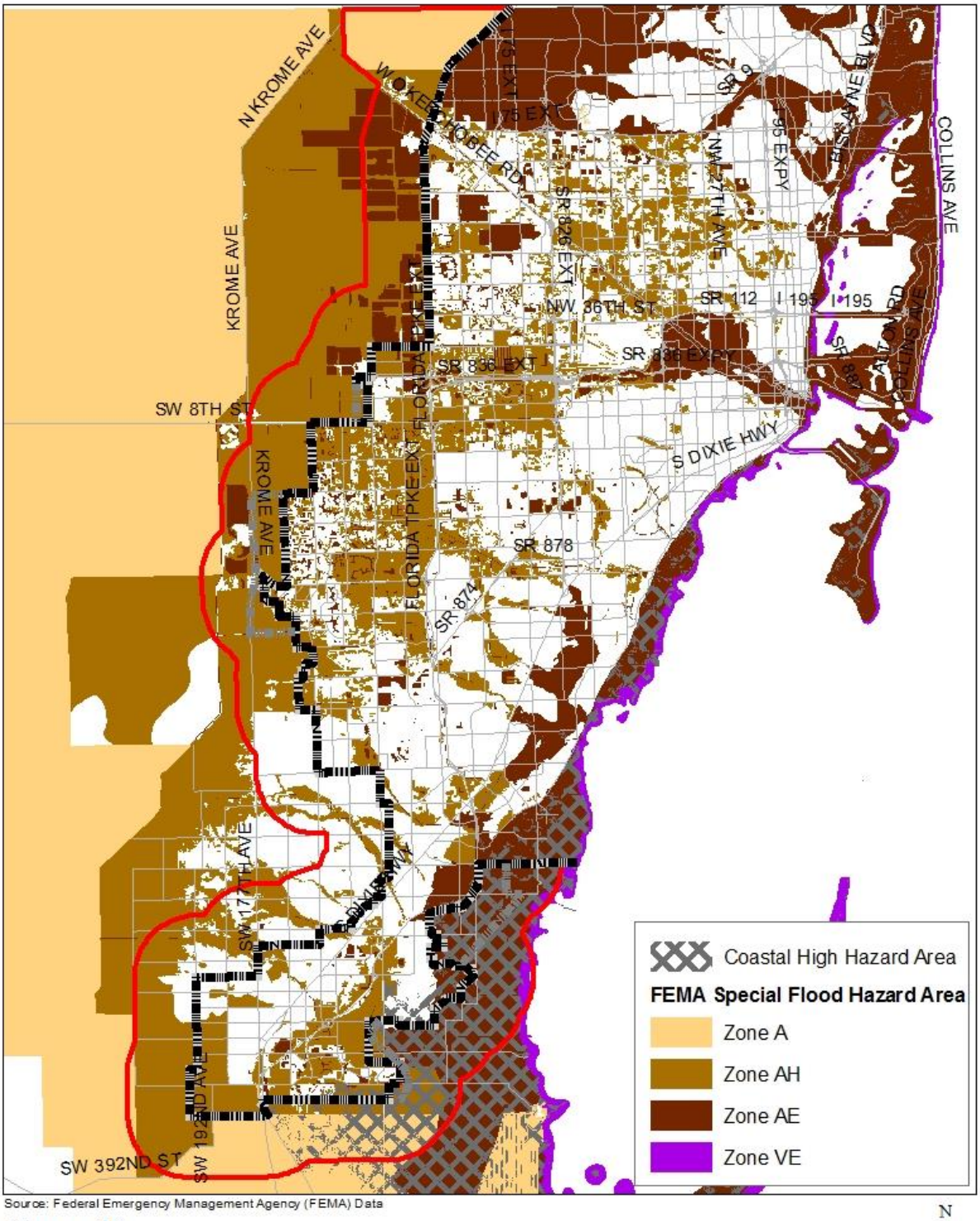
When planning for new areas of growth, important considerations include public safety risks, impacts to emergency management resources, property losses, public infrastructure capacity, and maintaining the County's compliance with the federal NFIP and CRS programs. Floodplain management regulations and storm surge vulnerabilities can also increase development costs and reduce potential density thereby making an area less suitable for development. Sea level rise is expected to increase the frequency and depth of flooding in vulnerable areas and this additional vulnerability is not reflected in the FEMA Special Flood Hazard Areas or the Coastal High Hazard Areas.

It is also important to consider projected flooding and sea level rise over the lifetime of the development and supporting infrastructure to ensure the safety and viability of communities and assets in a given area. CDMP Policy LU-13E states that the design, location, and development of infrastructure and buildings operated by or on behalf of Miami-Dade County shall include evaluation of sea level rise utilizing the Unified Sea Level Rise Projection presented in Table 7 of this report. This policy has implications for siting future public facilities intended to serve newly developed communities in areas vulnerable to future flooding made worse by projected sea level rise.

Areas within the FEMA A Zone are subject to inundation by the base flood. Projects within these areas must incorporate floodproofing techniques and demonstrate that development within the floodway will not increase flooding or that any increases do no impact structures on other properties. Areas within the FEMA VE Zone are subject to additional hazards due to storm-induced velocity wave action of 3 feet or more which leads to a heightened exposure to property losses and life safety risks. For these reasons, CDMP Policy LU-8G identifies the FEMA VE Zone as an area that should be avoided for expansion of the Urban Development Boundary.

Storm surge can result in large loss of life and cause massive destruction. The area most vulnerable to storm surge includes the Coastal High Hazard Area (CHHA) which state law defines

as the area below the Category 1 storm surge line as established by the NOAA SLOSH model. Placing additional population within the Coastal High Hazard Area increases life safety risks and may further strain emergency management resources. For these reasons, CDMP Policy LU-8G identifies the Coastal High Hazard Area as an area that shall not be considered for expansion of the UDB for residential uses.



Source: Federal Emergency Management Agency (FEMA) Data

Figure 18
Flooding and Storm Surge Vulnerability

VIII. Roadway Capacity

The capacity of the local roadway network to support growth in new areas of the County is an important consideration. Many of the major thoroughfares in the County are already over capacity and projected growth will further strain these roadways. This is particularly true in areas that lack high-volume transit service.

Figure 19 shows major intra-County commute patterns for areas located along the Urban Development Boundary ("areas of trip origination"). It could be anticipated that additional residential development within the adjacent area located outside of the UDB would have similar commute patterns. Alternatively, new commercial or industrial development that provides jobs suitable for nearby residents can keep more residents within the area for work.

For the area of trip origination south of SW 184th Street, the majority of intra-County commuters remain within the area. The second largest proportion of commuters travel to the area that includes Downtown Miami (Area 5). For the areas of trip origination north of SW 184th Street, the majority of intra-County commuters travel to the area that includes Downtown Miami (Area 5). Commute patterns for the trip origination area north of Kendall Drive also show a significant number of commuters traveling to the area that includes Downtown Doral (Area 6).

The Miami-Dade Long Range Transportation Plan (LRTP) is the County's comprehensive transportation plan that identifies needed highway, transit, freight, and non-motorized transportation improvements and serves as a mechanism for implementation and prioritization of identified improvements. Figure 20 shows the Directional Peak Period Volume/Capacity Ratio for the LRTP baseline year of 2015. Roadways with a directional peak period volume-over-capacity ratio that exceeds 1.0 are considered "failing" and those that are between 0.8 and 1.0 are considered "near failing".[29] Many of the roadways with failing segments, including US-1, SR 836, and US 27 are the major throughfares used to connect areas along the UDB with major employment hubs such as Downtown Miami, Miami International Airport and Port Miami.

Figure 21 shows the Directional Peak Period Volume/Capacity Ratio with projected growth through 2045 and "cost-feasible" transit and roadway improvements, as identified in the LRTP. The programmed increase in road capacity resulting from cost feasible improvements would not be sufficient to handle the future traffic needs arising from the projected population growth, hence the SMART Plan corridors are expected to complement the roadway network in moving the traffic from the urban fringes to the interior employment destinations. These corridors are discussed in Section IX (Mass Transit Availability) of this report. In addition, the map includes capacity improvements associated with the Kendall Parkway extension of State Road 836 as adopted by BCC Ordinance No. 18-109. The Kendall Parkway approval is the subject of an administrative challenge and will not become effective unless the approval is upheld.

[29] 2045 Miami-Dade Long Range Transportation Plan. Technical Report #6: Travel Demand Model

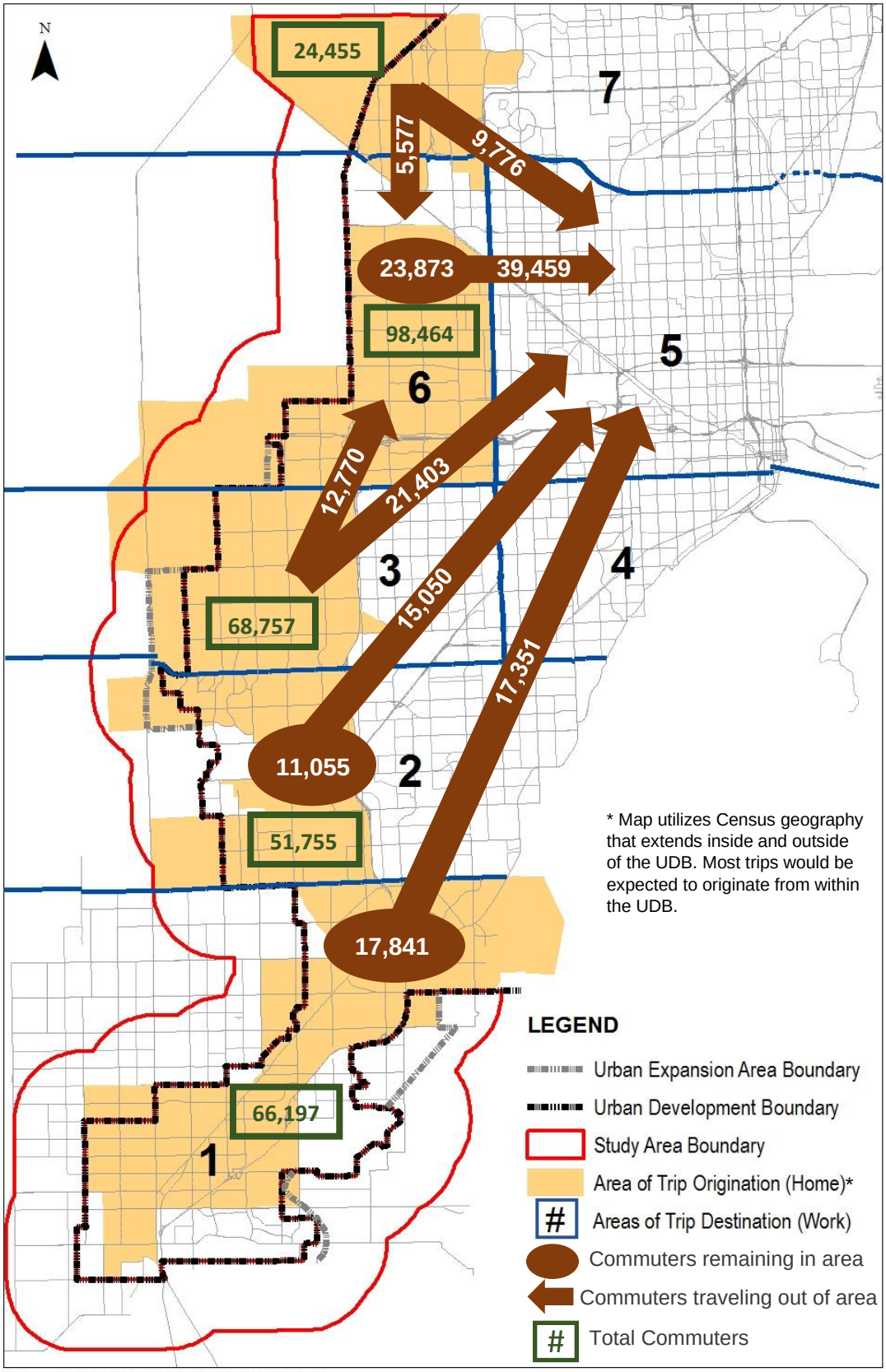


Figure 19

Generalized Commute Patterns

Figure 20

Directional Peak Period Volume/Capacity Ratio
2015 Base Year Network

LONG RANGE TRANSPORTATION PLAN 2045

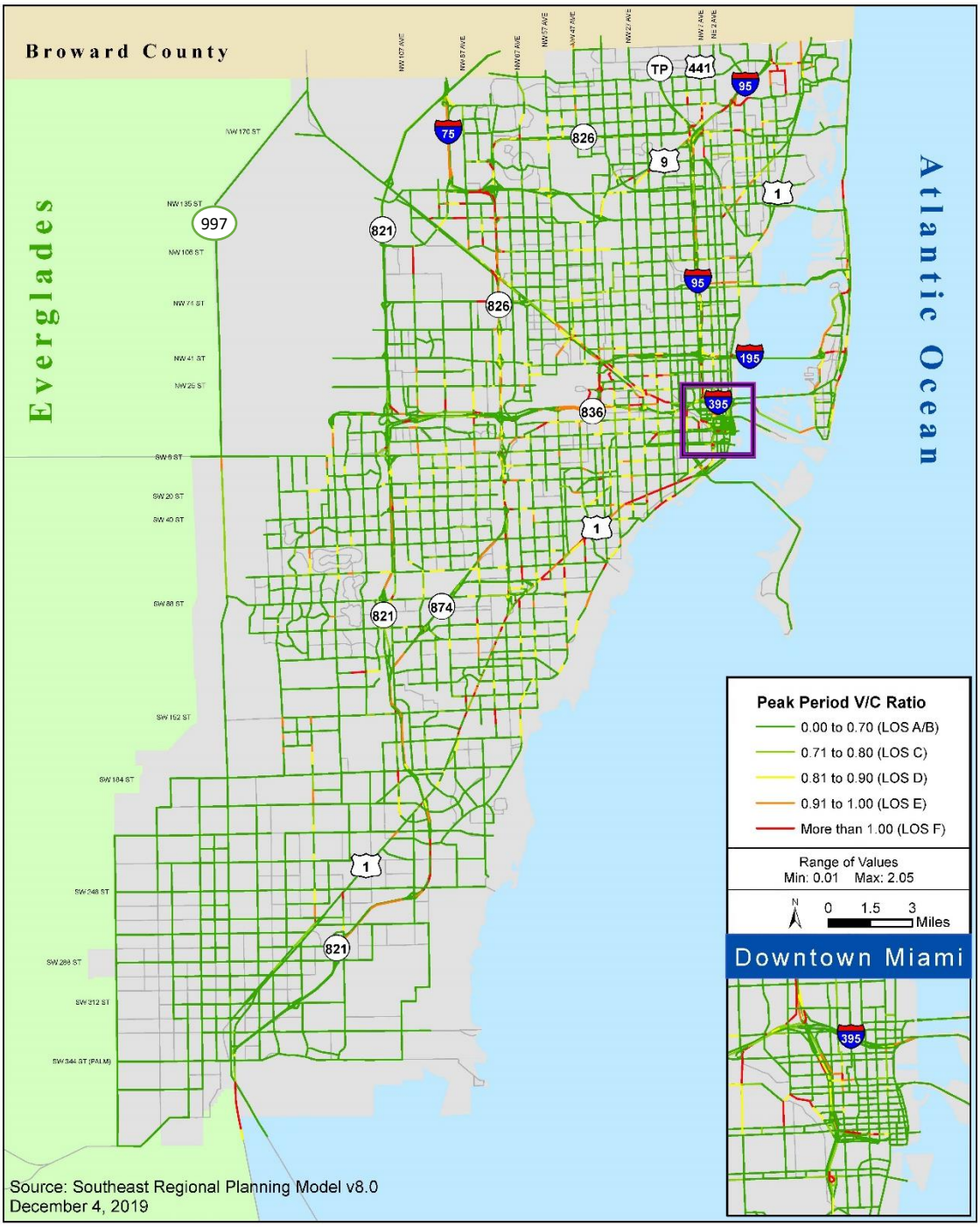
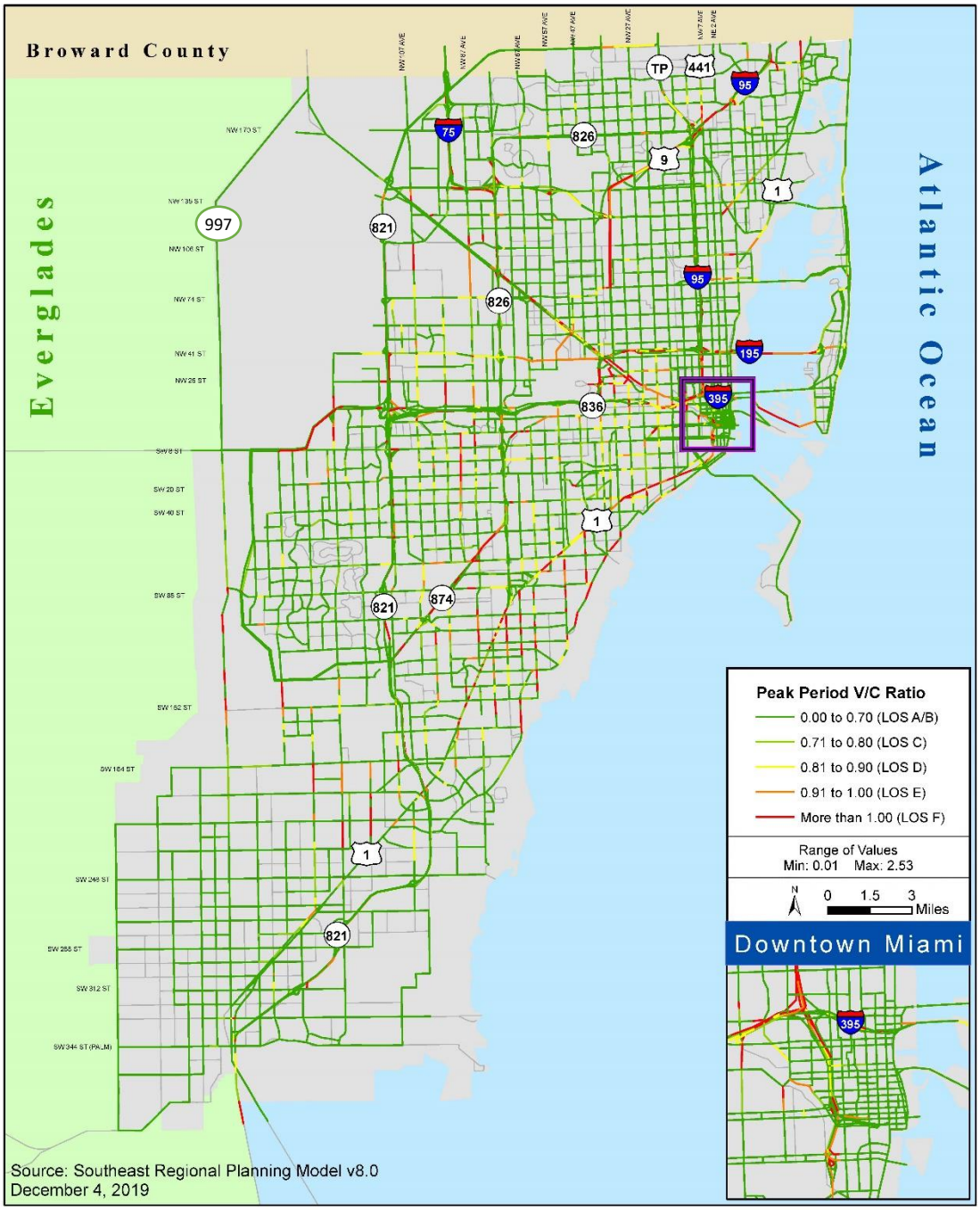


Figure 21

Directional Peak Period Volume/Capacity Ratio
2045 Cost Feasible Plan Network

LONG RANGE TRANSPORTATION PLAN 2045



Note: Consistency of the Kendall Parkway project (as depicted on map) with the CDMP is dependent on amendment adopted by BCC Ordinance 18-109 becoming effective.

IX. Mass Transit Availability

The availability of mass transit is an important consideration when identifying areas for new growth since it can alleviate congestion on the roadway network and support increased development density and intensity. CDMP Policy LU-8H requires applications proposing expansion of the Urban Development Boundary to include commitments to ensure that the proposed development will be served by mass transit with at least 20-minute peak hour headways or include a plan to provide such service. Areas located within one mile of premium transit routes are identified on Figure 22.

On April 21, 2016, the Miami-Dade Transportation Planning Organization (TPO) Governing Board endorsed the Strategic Miami Area Rapid Transit (SMART) Plan which identified six planned rapid transit corridors. The SMART Plan corridors are envisioned to be rapid transit corridors that operate on an exclusive transitway. The specific technology for each corridor will be determined as project development advances. The Miami-Dade County Board of County Commissioners further endorsed the SMART Plan by Resolution No. R-523-16, adopted on June 7, 2016. The SMART Plan Corridors will connect with the existing 25-mile Metrorail system. A network of Bus Express Rapid Transit (BERT) routes operating on limited access facilities will connect with the SMART Plan rapid transit corridors. The existing rapid transit system and SMART Plan network are depicted on Figure 22. Also depicted are existing bus routes operating at peak hour headways of 20 minutes or less. However, it should be noted that future operational changes on these routes could lead to increases in the headways.

Models run as part of the Miami-Dade Long Range Transportation Plan demonstrate that concentrating population growth along the SMART Plan corridors creates the most significant reductions in overall vehicle trips, vehicle miles traveled and vehicle hours traveled.[30] The CDMP contains strong policies that support increased densities and intensities along rapid transit corridors in the County. These policies serve to support transit ridership and funding, as well as, accommodating population growth in a manner that prevents discontinuous sprawl-type development. Specifically, CDMP Objective LU-7 states that “Miami-Dade County shall require all new development and redevelopment in existing and planned transit corridors and urban centers to be planned and designed to promote transit-oriented development (TOD), and transit use, which mixes residential, retail, office, open space and public uses in a safe, pedestrian and bicycle friendly environment that promotes mobility for people of all ages and abilities through the use of rapid transit services.”

To promote transit-oriented development along the rapid transit corridors, the CDMP contains policies that provide for the development of moderate to high density, design-unified urban centers within one-half mile of rapid transit stations. The CDMP permits densities up to 125 dwelling units per acre within Community Urban Centers. In addition, the areas along planned rapid transit corridors located between designated urban centers are permitted densities up to 60 dwelling units per acre within one-quarter mile of the corridor and 36 dwelling units per acre between one-quarter mile and one-half mile of the corridor for mixed-use projects. If such areas were to be brought into the Urban Development Boundary, they would be eligible for densities in accordance with the aforementioned mixed-use development text of the CDMP.

[30] 2045 Miami-Dade Long Range Transportation Plan. Technical Report #6: Travel Demand Model

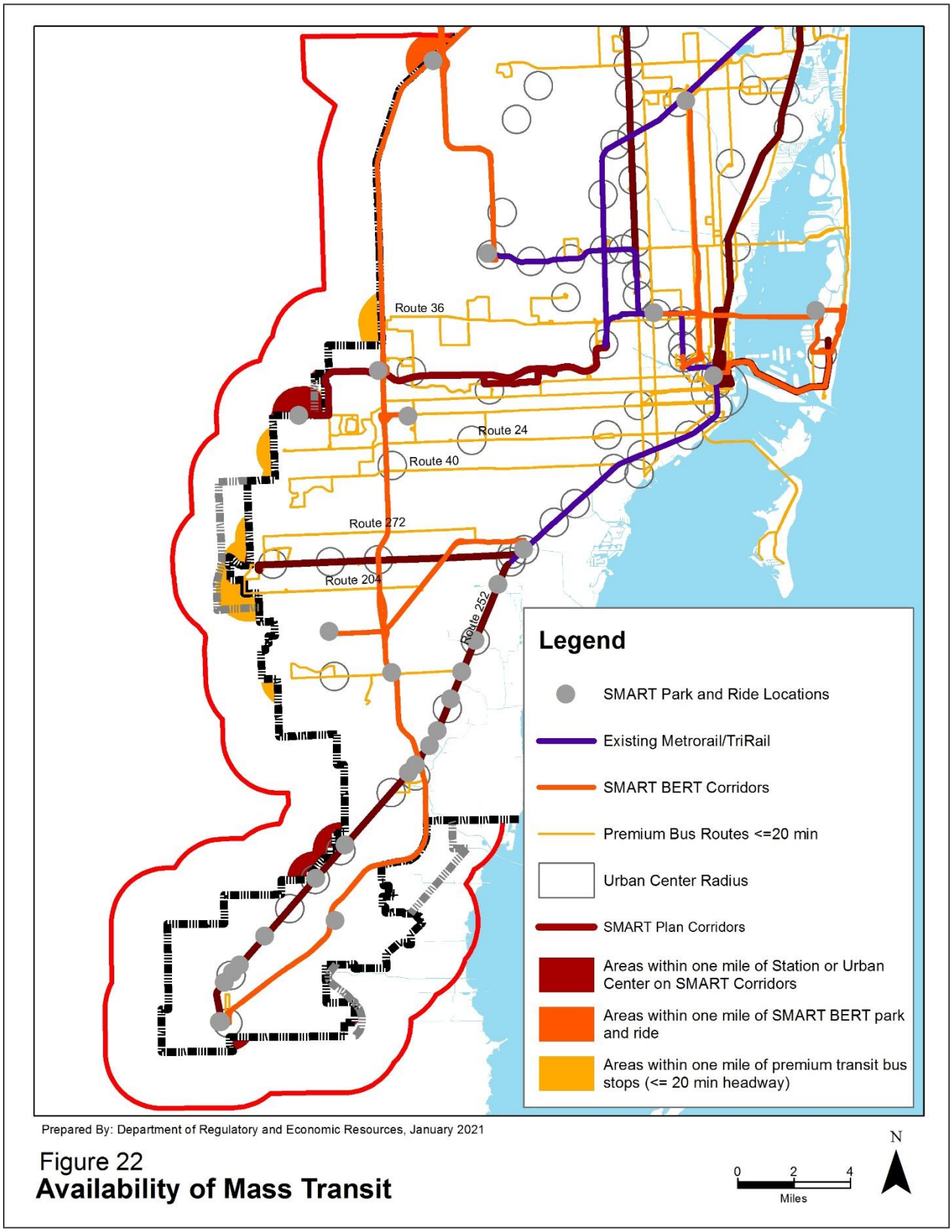


Figure 22
Availability of Mass Transit

X. Water and Sewer Availability

CDMP Policy LU-8H requires applications proposing expansion of the Urban Development Boundary (UDB) to be served by utility water and sewer service. The availability of these services, therefore, is an important consideration when identifying areas suitable for future growth.

The Miami-Dade Water and Sewer Department (WASD) water service area contains interconnected systems and thus, for the most part, function as a regional system. The service area includes the Hialeah-Preston area serving the northern part of Miami-Dade County, the Alexander Orr, Jr. area serving the central and portions of the southern part of the County and the South Dade area (formerly known as the Rex Utility District) serving the remaining southern part of Miami-Dade County. The Biscayne Aquifer is the major source of drinking water for the County. Groundwater from the brackish Floridan Aquifer is the drinking water source for the Hialeah Reverse Osmosis Water Treatment Plant. Figure 23 shows areas along the UDB with a water connection point located within one-quarter mile of the UDB. Areas that are not served by utility water service, utilize private wells for potable water needs.

Currently, all of the WASD potable water treatment facilities have capacity to treat and supply water in accordance with the level of service standards outlined in the CDMP. The County's current Water Use Permit, issued by the South Florida Water Management District, contains restrictions on the amount of water that can be withdrawn from the Biscayne Aquifer. Additional water needs must be met through alternative water supply projects, which include withdrawals from the upper Floridan Aquifer. During the planning and building permit phase, each project is analyzed to determine the overall proposed water demand. The future water demand is reserved through the water allocation process.

WASD operates three regional wastewater treatment facilities that serve over 2.7 million customers: the North District, South District and Central District Plants. The North and Central District Wastewater Treatment Plants currently utilize ocean outfall to dispose of the treated effluent. The South District Wastewater Treatment Plan utilizes injection wells as its primary disposal method. Figure 24 shows areas along the UDB with a sewer force main located within one-quarter mile. Areas that are not served by utility sewer service utilize septic tanks for wastewater disposal.

Properties that are connected to a centralized sewer system dispose of wastewater via a collection and transmission system that includes a network of sanitary sewer gravity mains, sanitary sewer force mains and sanitary sewers pump stations that ultimately discharge to a wastewater treatment plant. Currently, all of the Miami-Dade Water and Sewer Department (MDWASD) wastewater treatment plants have capacity to treat and dispose of current wastewater flow demands in accordance with the level of service standards outlined in the CDMP.

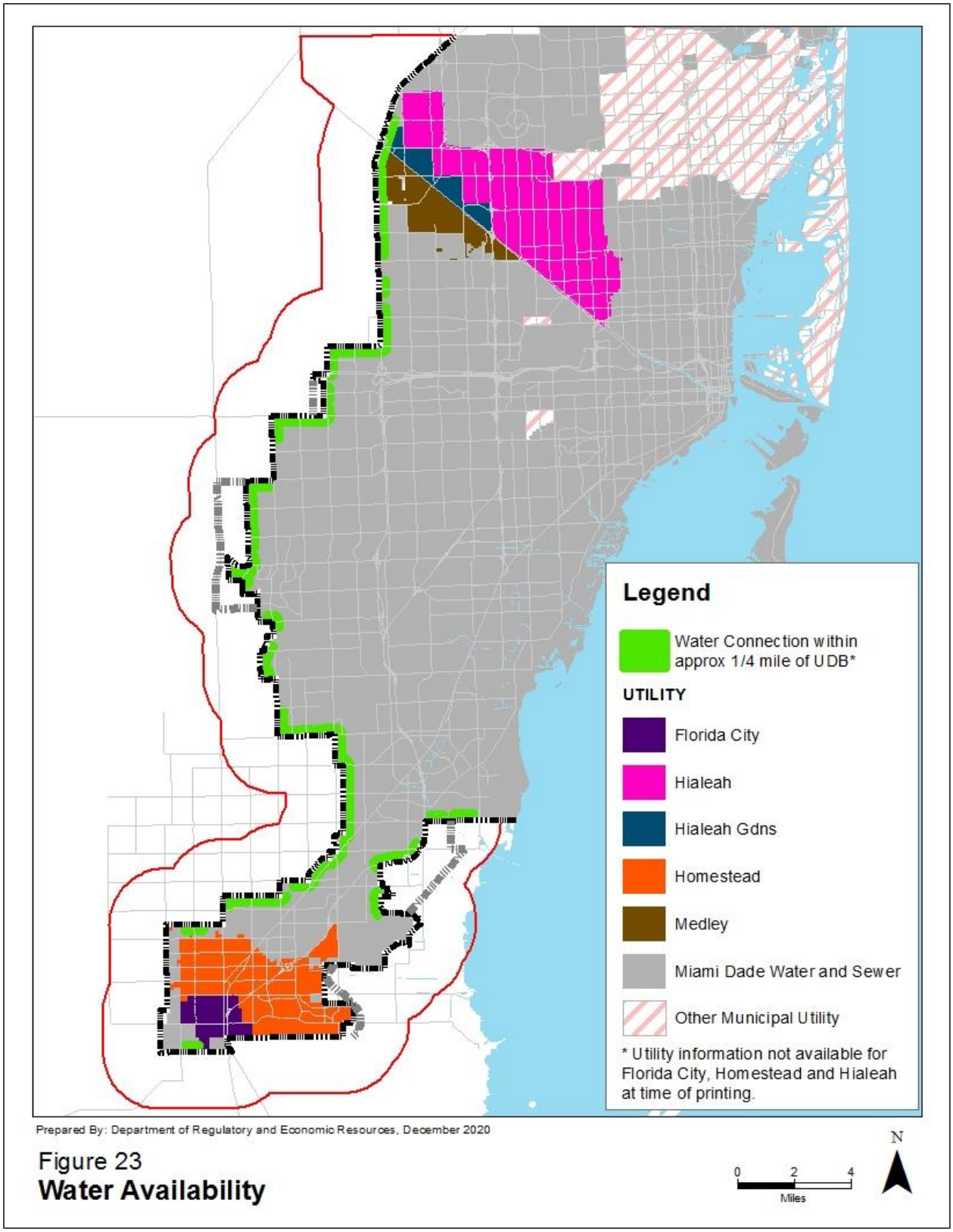


Figure 23
Water Availability

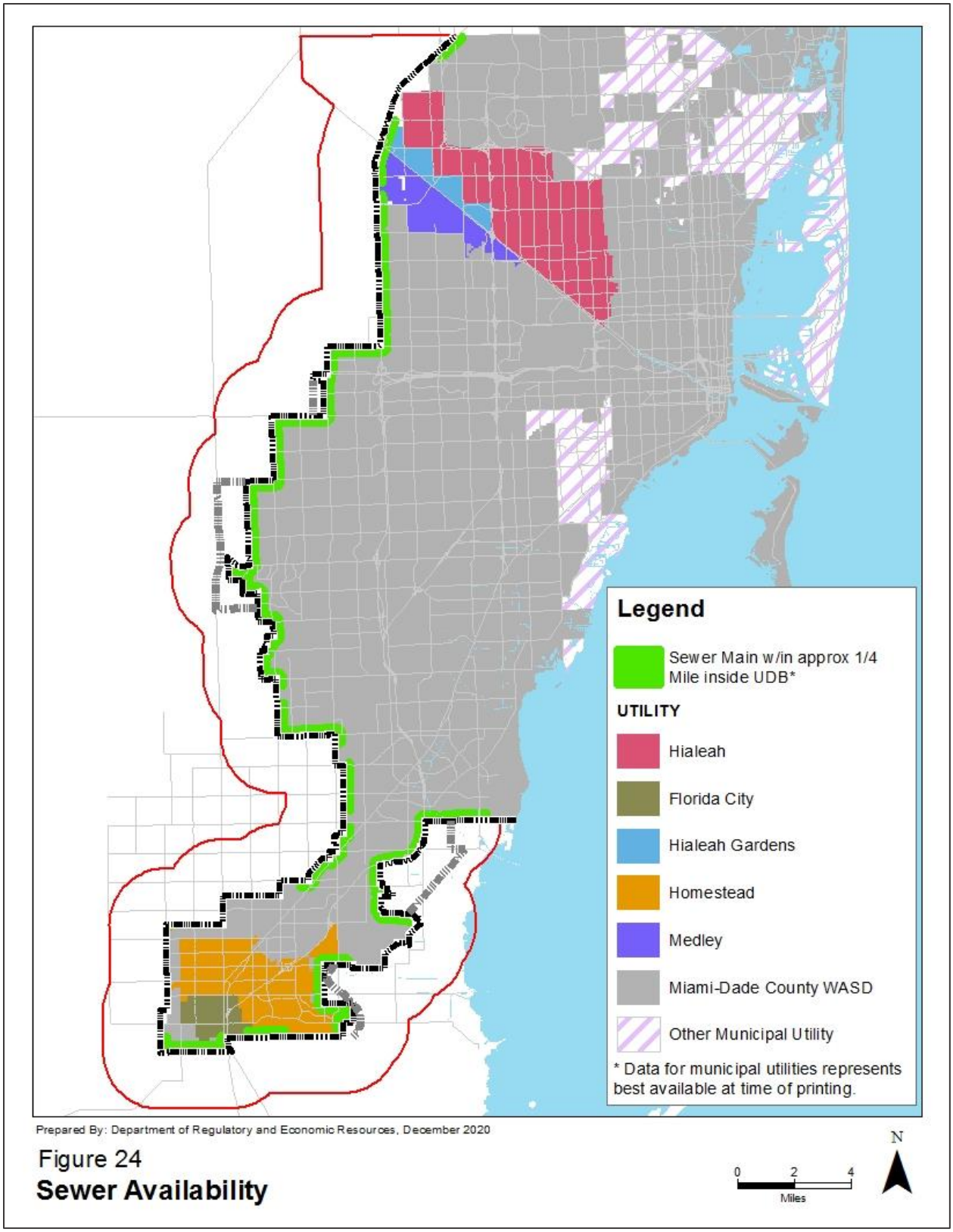


Figure 24
Sewer Availability

Chapter 3

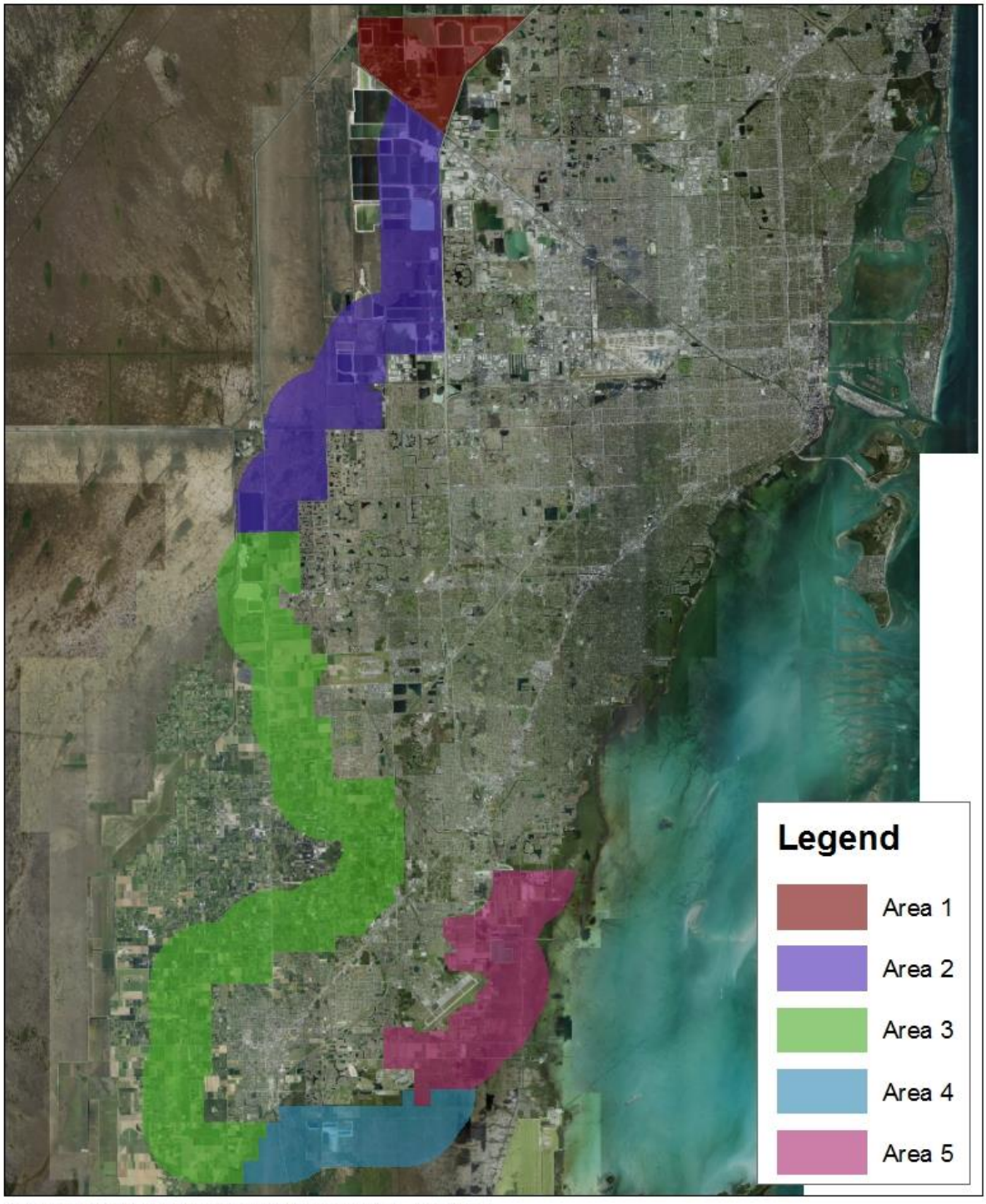
Detailed Area Analysis

Introduction

Land outside of the Urban Development Boundary serves important human health, environmental and economic functions for the County. Decisions regarding where future growth should be accommodated outside of the current UDB requires a balancing of the anticipated benefits of growth against the loss of those functions. Identifying new UEAs should focus on decreasing impacts to identified resources, particularly those related to the human and ecological health of the County, while ensuring that the selected area can be well served by transportation infrastructure and utilities and is resilient to the impacts of coastal storms and climate change.

Section 163.3177(6)(a)(9), Florida Statutes, requires the CDMP future land use element and any amendment to the future land use element to discourage the proliferation of urban sprawl. The section provides primary indicators used to determine whether a proposed amendment does or does not adequately discourage urban sprawl. The identification of new areas for future growth should also consider the ability of the area to support development that would not be seen as furthering urban sprawl. The urban sprawl indicators contained in state law are included as Appendix 4.

CDMP Policy LU-8G identifies areas that 'shall not be considered' and areas that 'should be avoided' for expansion of the UDB. Areas that shall not be considered include areas that have clearly defined boundaries and where urban-type development is considered to be undesirable due to environmental or other constraints. Areas that should be avoided include areas that warrant a case-by-case review to determine whether a particular application would have a deleterious impact on the area identified for avoidance. This Chapter analyzes the various constraints and infrastructure availability, as identified in the Policy Considerations (Chapter 2). For purposes of the analysis, the Study Area is divided into five "Analysis Areas" as depicted on Figure 25 below. In addition, a detailed analysis is provided for areas with fewer constraints and good infrastructure availability.



Prepared By: Department of Regulatory and Economic Resources, January 2021

Figure 25
Area Analysis Map

0 10,000 20,000
SCALE IN FEET

I. Area 1 – Open Land Subarea 1 (see Figure 25 for boundaries)

Area 1 (Snake-Biscayne Canal Basin) is located in northwestern Miami-Dade County and is generally bounded by Broward County and the Snake Creek Canal (C-9) on the north, the Homestead Extension of the Florida Turnpike (HEFT) to the east/southeast, West Okeechobee Road (US 27 & SR 25) and the Miami Canal (C-6) to the south/southwest and theoretical NW 147 Avenue/ East Coast Protective Levee to the northwest. Approximately 78% of Area 1 is identified as areas that should be avoided for expansion of the UDB in CDMP Policy LU-8G. The areas include CERP project footprints and Wetlands of Regional Significance. These constraints are depicted on Figure 26.

Land Uses.
The area is currently designated Open Land (Subarea 1) on the CDMP Land Use Plan Map which allows residential uses at a maximum density of one dwelling unit per five acres, limestone quarrying and related uses, necessary institutions and public facilities, utility facilities, communication facilities, recreational uses, and agricultural uses (some agricultural uses are limited based on limited flood protection provided in the area). The area also includes the decommissioned Opa-Locka West Airport site. The CDMP provides for outdoor vehicle recreational areas and recreational motorsport facilities at the site with Board of County Commissioners approval. The CDMP was amended in 2020 to allow for commercial truck parking facilities to occur throughout this area on parcels 10 acres or greater, with the exception of the former Opa Locka West Airport property.

Rockmining activities cover more than half of the total acreage in the area. Approximately 27 percent of the area is vacant land with most of it being owned by governmental agencies. Agriculture is next largest land user with 16.6 percent of the total area. The institutional uses in this area consist of two cemeteries. There are only approximately 90 dwelling units within the area, 57 mobile homes in the Jones Trailer Park on North Krome Avenue and 25 single-family dwellings and 8 duplex units along West Okeechobee Road.

Rockmining is the primary use to the immediate south and west of Area 1 with environmentally sensitive areas such as the State Water Conservation Area being located further west of Area 1. Uses north of Area 1 (in Broward County) include low density residential and conservation land. Land uses east of Area 1 (across the Turnpike) include industrial uses and the location of the approved American Dream Mall and Graham developments. The American Dream Mall project included approval for up to 3.5 million square feet of retail use, 1.5 million square feet of entertainment use, 2,000 rooms of lodging, and 1.2 million square feet of back of house uses on the property. The Graham Property was approved for up to 3 million square feet of business park use, 1 million square feet of commercial/retail, 2,000 multi-family units, and hotel uses.

Constraints.
Area 1 includes the North Lake Belt Comprehensive Everglades Restoration Plan (CERP) project which is identified as an area that should be avoided for expansion of the UDB in CDMP Policy LU-8G. The project is envisioned to be an in-ground storage reservoir with a total capacity of

approximately 90,000 acre feet that would store water during the wet season. The North Lake Belt project relies on the completion of mining to create the in-ground reservoir, however, mining has not yet commenced within the area. A 2018 report by the National Academies of Science, an independent committee charged with assessing CERP progress, lists the project status as "feasibility unproven" and states that the feasibility of the project "has also been questioned, and very little, if any, progress has been made to resolve uncertainty about the Lake Belt reservoirs."[31] In 2020, the US Army Corps of Engineers (COE) began the Project Implementation Report process for the Biscayne Bay and Southeastern Everglades Ecosystem Restoration (BBSEER) project of CERP. The primary focus of the project is on Phase II of the Biscayne Bay Coastal Wetlands project, however, the study will also encompass other CERP components including the North Lake Belt project. The BBSEER effort, which is expected to conclude in a couple of years, could provide additional insight into the feasibility of the North Lake Belt project.

Area 1 also includes Wetlands of Regional Significance which are identified as areas that should be avoided for expansion of the UDB in CDMP Policy LU-8G. The area is part of the western regional system of wetlands, however, wetlands in this area are considered to be highly disturbed.[32] Formal wetland delineation will be needed to determine the exact extent and quality of jurisdictional wetlands within the area. CDMP Policy CON-7A indicates that the degradation or destruction of Wetlands of Regional Significance is limited to activities that 1) are necessary to prevent or eliminate a threat to public health, safety or welfare; or 2) are water dependent and no other reasonable alternative exists; or 3) clearly in the public interest and no other reasonable alternative exists; or 4) are carried out in accordance with an approved basin management plan; or 5) are in areas that have been highly disturbed or degraded and where restoration of a wetland with an equal or greater value in accordance with federal, State and local regulations is feasible. Policy CON-7A further states that habitats critical to endangered or threatened species shall not be degraded or destroyed. Area 1 does not include designated habitat, however, the area may still be utilized by federal and state designated species.

The area is located in the northern portion of the Miami-Dade Lake Belt and includes several active mines. State law requires that amendments to local comprehensive plans located within one mile of the Lake Belt be compatible with limestone mining activities and that Miami-Dade County strongly consider limestone mining activities and ancillary operations (i.e., lake excavation, use of explosives, rock processing, cement, concrete and asphalt products manufacturing) when amending local comprehensive plans. Uses that would generally be compatible with active rockmining uses include industrial uses that do not have groundwater impacts. Residential uses and uses that include large congregations of people would generally be incompatible in close proximity to active rockmining.

Historical Resources.
Area 1 contains cultural and archaeological resources but no designated historic structures at the time of publication. There are several recorded sites on the Florida Master Site List that is maintained by the Florida State Division of Historical Resources. Recorded sites include historic canals and prehistoric tree island midden sites. Area 1 is considered to have a high probability of containing additional archaeological resources, likely prehistoric tree island sites that have yet to

[31] National Academies of Sciences, Engineering and Medicine. Progress Toward Restoring the Everglades: The Seventh Biennial Review. 2018.
[32] South Florida Water Management District. Land Assessment: East Coast Buffer. 2013.

be identified. Tree island archaeological sites may contain unmarked human remains protected under State Statute Section 872.05, Florida's Unmarked Human Burial Act. Prior to any development or ground disturbing activities, a Cultural Resource Assessment Survey (CRAS) may be required in accordance with applicable federal, state and local requirements. Areas with a high probability for the presence of archeological resources are not more or less suitable for the location of future UEAs, and it should be noted that many areas with significant archaeological resources are located in developed areas inside the current UDB. Rather the potential or known presence of archaeological resources is a factor that should be considered in conducting ground-disturbing activities in areas with a high probability of archaeological resources, including rock mining, agriculture and development.

Most of Open Land Subarea 1 has a rating of AH on Flood Insurance Rate Maps produced by Federal Emergency Management Agency (FEMA). This rating indicates shallow flooding with average depths of one to three feet can occur during a 100-year storm, which is defined as an event that has a one percent chance to occur in any one year. The County does not currently provide flood protection in this area.

Infrastructure.
Roadway access to the area is provided by two four-lane arterial state roadways, West Okeechobee Road (US 27) and Krome Avenue (SR 997), in addition to the Homestead Extension of the Florida Turnpike which connects to I-75 just north of the area. The area does not currently have nearby premium transit service, however, the northeastern portion of Area 1 falls within one mile of the proposed SMART Plan Northwest Bus Express Rapid Transit (BERT) Corridor.

Recommendation for Further Analysis.
The area south of NW 170th Street, as shown on Figure 26, is recommended for further analysis. The area north of NW 170th Street was excluded from the area for further analysis since it is largely mined or held in public ownership. It is also the primary location for the North Lake Belt CERP project components. The detailed analysis for the area south of NW 170th Street is provided in the following paragraphs.

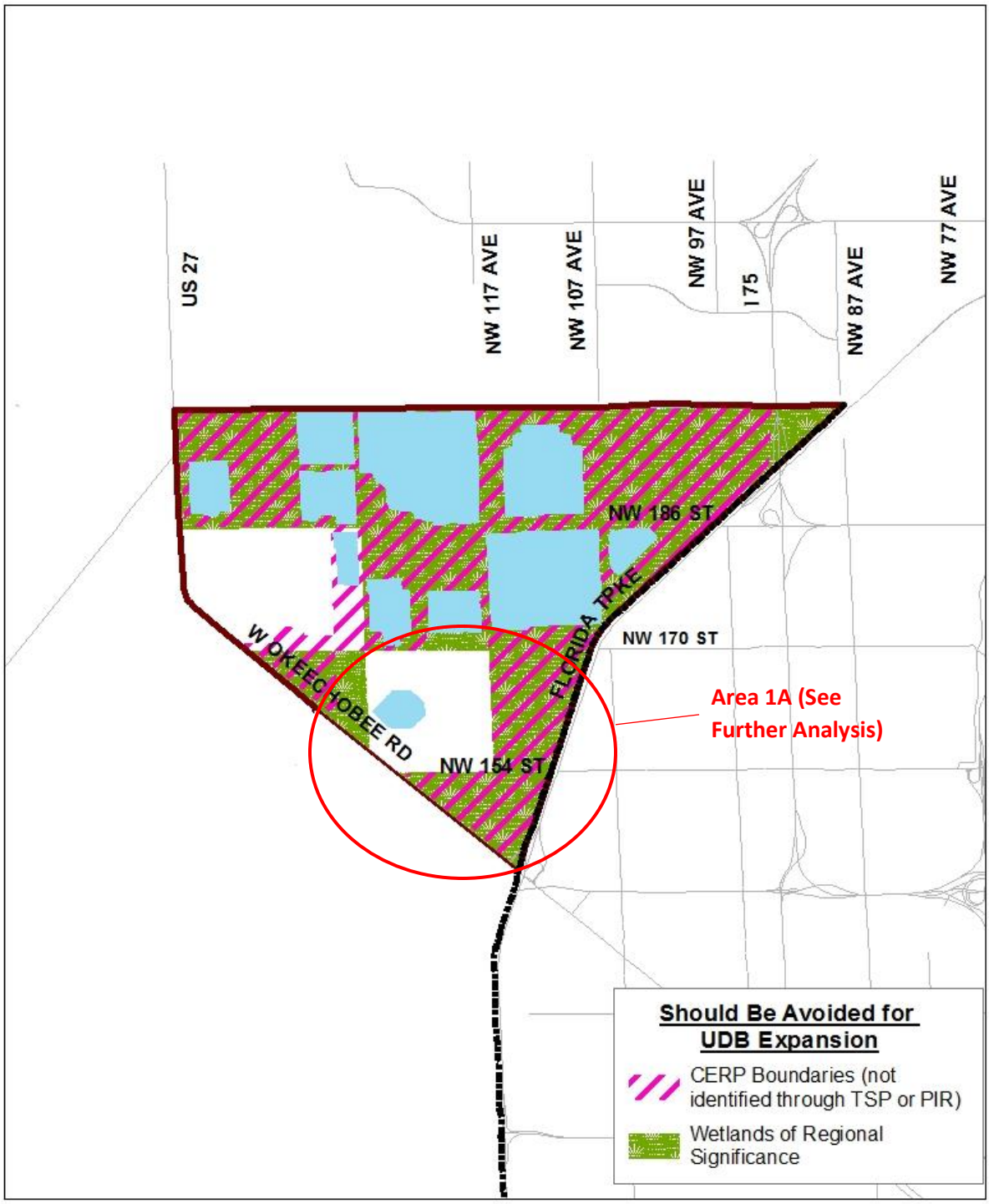


Figure 26
Area 1 - Constraints Map

Detailed Analysis Area 1A.

Within Area 1, a ±1,398.8-acre area located south of NW 170th Street, as depicted on Figure 27, was reviewed in more detail. Major policy considerations in this analysis area include consistency with the CERP, compatibility with nearby rockmining uses, and protection of wetland functions. These issues are discussed in more detail in the following paragraphs.

Approximately 634 acres of the area is within the North Lake Belt Comprehensive Everglades Restoration Plan (CERP) project which is identified as an area that should be avoided for expansion of the UDB in CDMP Policy LU-8G. As discussed previously, the purpose of the North Lake Belt project is to capture and store a portion of the stormwater runoff from the C-6, western C-11 and C-9 Basins to maintain water levels stages and to provide water deliveries to Biscayne Bay that would help meet salinity targets. The project is expected to be implemented when mining concludes. Figure 29 identifies the project components, as identified in the initial CERP authorization. As shown, components planned for the analysis area include an in-ground reservoir in the area where future mining is anticipated and adjacent stormwater treatment areas. A major consideration within this area is protection of land needed for full implementation of CERP and to prevent constraints for the proposed CERP restoration of Biscayne Bay. In 2020, the US Army Corps of Engineers began the Project Implementation Report process for the Biscayne Bay and Southeastern Everglades Ecosystem Restoration (BBSEER) project of CERP. The potential for the delivery of water from this area to Biscayne Bay is currently being reviewed as part of the CERP BBSEER effort.

Detailed Analysis Area 1A includes Wetlands of Regional Significance which generally follow the CERP boundaries. Wetlands of Regional Significance are identified as areas that should be avoided for expansion of the UDB in CDMP Policy LU-8G. The area is part of the western regional system of wetlands, however, wetlands in this area are considered to be highly disturbed and are located outside of the wellfield protection area. CDMP Policy CON-7A limits allowable activities in Wetlands of Regional Significance. Formal wetland delineation would be needed to determine the exact extent and quality of jurisdictional wetlands within the area. There is no designated habitat within the area, however, it may still be utilized by federal and state designated species.

The area has access to US 27 and the Homestead Extension of the Florida Turnpike which provides a direct connection to I-75. The proposed SMART Plan Bus Express Rapid Transit (BERT) station that is planned north of NW 170th Street will provide transit connections to the area. The planned BERT corridor is expected to connect to the existing Metrorail and south Dade. In addition, the area has utility water and sewer connections located within one-quarter mile (inside the UDB).

As shown on Figure 28, the primary existing uses in the area include vacant land, agricultural land and surface parking lots. A substantial portion of the area is owned by rockmining interests but has not been mined to date. The area is located in the northern portion of the Miami-Dade Lake Belt and includes several active mines. State law requires that amendments to local comprehensive plans located within one mile of the Lake Belt be compatible with limestone mining activities and that Miami-Dade County strongly consider limestone mining activities and ancillary operations (i.e., lake excavation, use of explosives, rock processing, cement, concrete and asphalt products manufacturing) when amending local comprehensive plans.

The broader area that includes the detailed analysis area is considered to have a high probability for containing archaeological resources, likely prehistoric tree island sites that have yet to be identified. Tree island archaeological sites may contain unmarked human remains protected under State Statute Section 872.05, Florida's Unmarked Human Burial Act. Prior to any development or ground disturbing activities, a Cultural Resource Assessment Survey (CRAS) may be required in accordance with applicable federal, state and local requirements.

It should be noted that the analysis area is the subject of a pending annexation application by the City of Hialeah Gardens. The numerous constraints that exist in areas located outside of the UDB, as documented in the Policy Considerations (Chapter 2) of this report, should be considered when reviewing applications for annexation or incorporation outside of the UDB.



Figure 27

Detailed Analysis Area 1A Boundary

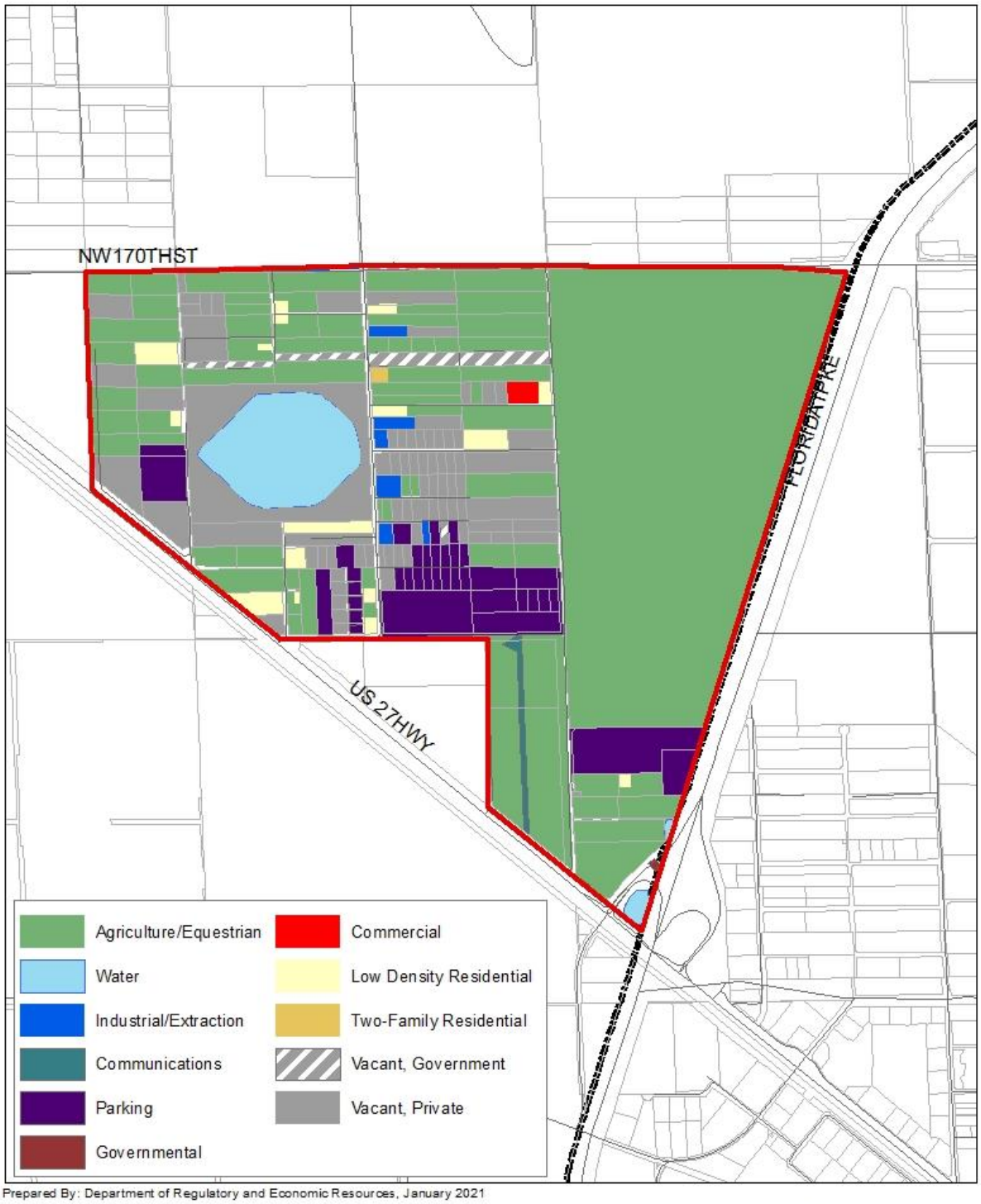


Figure 28
Area 1A - Existing Land Use

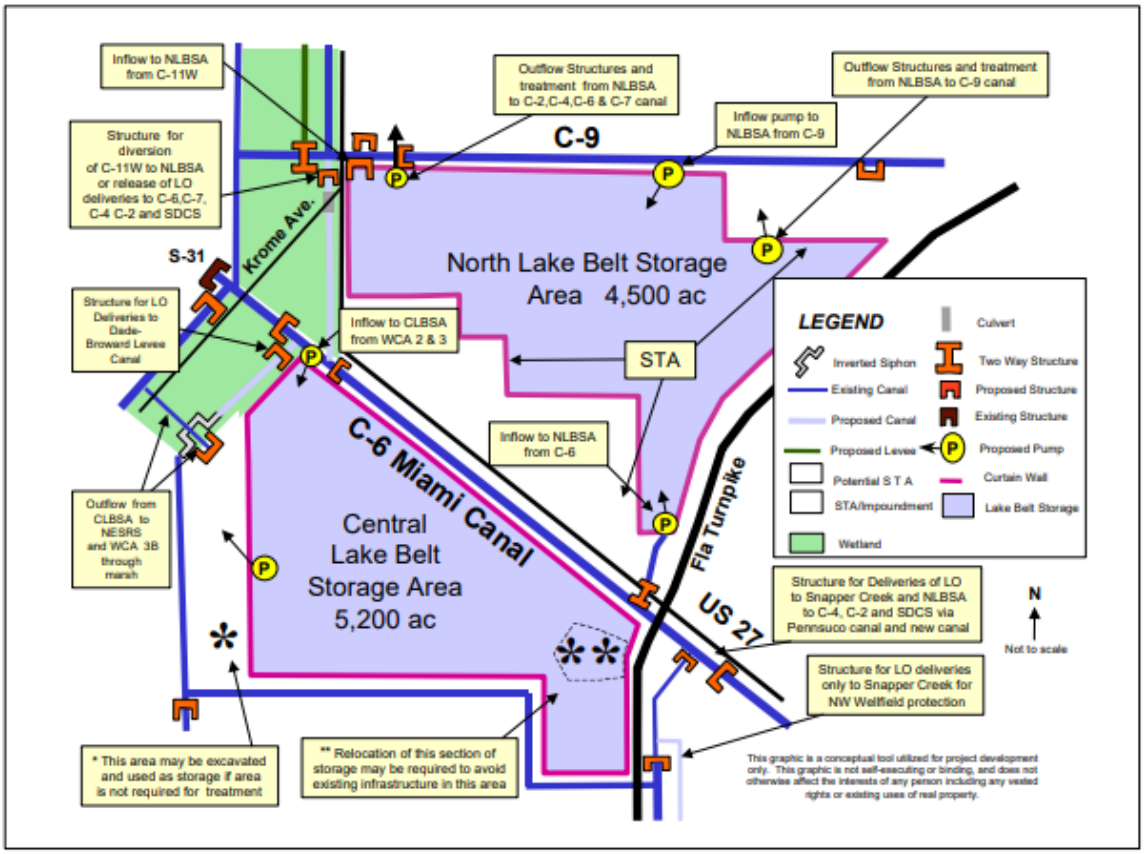


Figure 29 – North Lake Belt CERP Project Components

Source: Central and Southern Florida Project Comprehensive Review Study, US Army Corps of Engineers, 1998

II. Area 2 - Northwest Wellfield/Bird Drive Wetlands (See Figure 25 for boundaries)

Approximately 86% of Area 2 is identified as areas that shall not be considered for expansion of the UDB in CDMP Policy LU-8G. These areas include the Pennsuco Wetlands, Bird Drive Wetlands, the Northwest Wellfield Protection Area (west of the Turnpike Extension between Okeechobee Road and NW 25 Street) and the West Wellfield (west of SW 157 Avenue between SW 8 Street and SW 42 Street). These constraints are identified on Figure 30. In addition, CDMP Policy CON-3E states that "The area west of the Turnpike, east of the Dade-Broward Levee, north of NW 12th Street and south of Okeechobee Road shall be reserved for limestone mining and approved ancillary uses as provided for in Chapters 24 and 33 of the Miami-Dade County Code and the entire area west of the Turnpike, north of NW 25th Street and south of Okeechobee Road shall remain unurbanized."

Land Uses.
Area 2 is designated Open Land on the CDMP Land Use Plan Map and includes Subarea 2 (Northwest Wellfield) and Subarea 3 (Tamiami-Bird Canal Basins). These areas generally allow limestone quarrying, utility facilities, seasonal agriculture, and residential uses at 1 dwelling unit per 5 acres. The area is primarily used for rockmining and includes a significant amount of publicly owned land that is anticipated for use as part of ecosystem restoration efforts. The area immediately west of Urban Expansion Area No. 1 was acquired by Miami-Dade County for future construction of a West District Wastewater Treatment Plant. The property located west of the treatment plant site is utilized by the South Florida Water Management District for an emergency detention basin that provides flood protection for low-lying areas in and around Sweetwater and West Miami.

Constraints.
The Northwest Wellfield is a major source of drinking water for Miami-Dade County. It consists of fifteen wells, with the installed design capacity for up to 225 million gallons per day. Land uses and activities within the cone of influence from the wellheads have the potential to directly impact the quality of water ultimately withdrawn from the wells. The CDMP affords a high level of protection for the Northwest Wellfield recognizing that this wellfield provides the opportunity to maintain pristine water quality since the area within the full extent of the cone of influence is largely undeveloped (CDMP, Page I-78). To protect water quality at the County's wellfields, Chapter 24 also includes limitations on sewage loading within the cones of influence. These restrictions may limit the amount of development that can be achieved on a given site. For example, land uses within the 10 day travel-time of a wellfield protection area that are served by public sanitary sewers are subject to a sewage loading restriction of 850 gallons per day (gpd) per acre. Based on Chapter 24-43.1 of the Code of Miami-Dade County, sewage flows for a single family residence are estimated to be 210 gpd/unit. This would allow for a maximum of 4 units per acre within the 10-day travel-time contour.

The area of the Bird Drive Wetlands is also the northernmost area of the West Wellfield Interim Protection Area. This portion of the West Wellfield (west of SW 157 Avenue between SW 8 Street and SW 42 Street) is identified as an area that shall not be considered for expansion of the UDB.

The Bird Drive Wetlands are also separately identified as an area that shall not be considered for expansion of the UDB in Policy LU-8G due to the aquifer recharge value of the area. The Bird Drive Wetlands currently extend into UEA No. 2 but have been proposed for exclusion in staff application May 2019 CDMP Cycle, Application No. 5. Consideration of the proposed contractions is on-hold, pending release of this Study.

Area 2 contains inland freshwater wetlands which are identified as Wetlands of Regional Significance on Figure 14 of the CDMP Land Use Element. Formal wetland delineation will be needed to determine the exact extent and quality of jurisdictional wetlands within the area. CDMP Policy CON-7A indicates that the degradation or destruction of Wetlands of Regional Significance is limited to activities that 1) are necessary to prevent or eliminate a threat to public health, safety or welfare; or 2) are water dependent and no other reasonable alternative exists; or 3) clearly in the public interest and no other reasonable alternative exists; or 4) are carried out in accordance with an approved basin management plan; or 5) are in areas that have been highly disturbed or degraded and where restoration of a wetland with an equal or greater value in accordance with federal, State and local regulations is feasible. Policy CON-7A further states that habitats critical to endangered or threatened species shall not be degraded or destroyed.

The area contains a range of habitats that includes a mixture of seasonally flooded wetlands with forested and open areas that may support federal or state protected wildlife species. Portions of Area 2 are included within areas that are proposed to be designated as critical habitat for the Florida Bonneted Bat by US Fish and Wildlife Services (FWS). The designation focuses on large connected natural areas which are relatively free of human disturbances. The FWS is expected to detail additional guidance in a forthcoming recovery plan for the Florida Bonneted Bat. Based on analysis from FWS, the perpetuation of the Florida Bonneted Bat could be negatively impacted by land use changes that introduce human activity into the natural areas that have been identified as critical habitat to the survival of the species, as depicted on Figure 7 of this report. The wetlands in this area are also located in close proximity to established rookeries for the federally-endangered Wood Stork and provide ideal foraging conditions.

There are several active rockmining operations in the area. Policy CON-6A of the CDMP states that “areas of highest suitability for mineral extraction in Miami-Dade County shall be reserved for that use and shall be protected from encroachment by incompatible uses.” To that end, CDMP Policy CON-3E states that “The area west of the Turnpike, east of the Dade-Broward Levee, north of NW 12th Street and south of Okeechobee Road shall be reserved for limestone mining and approved ancillary uses as provided for in Chapters 24 and 33 of the Miami-Dade County Code and the entire area west of the Turnpike, north of NW 25th Street and south of Okeechobee Road shall remain unurbanized.” In addition, state law requires that amendments to local comprehensive plans located within one mile of the Lake Belt be compatible with limestone mining activities and that Miami-Dade County strongly consider limestone mining activities and ancillary operations (i.e., lake excavation, use of explosives, rock processing, cement, concrete and asphalt products manufacturing) when amending local comprehensive plans.

The area includes the footprint for the Central Lake Belt CERP project. A 2018 report by the National Academies of Science, an independent committee charged with assessing CERP progress, lists the project status as “feasibility unproven” and states that the feasibility of the project “has also been questioned, and very little, if any, progress has been made to resolve

uncertainty about the Lake Belt reservoirs."[33] The BBSEER effort did not specifically incorporate the Central Lake Belt CERP project due to a specific focus of the effort on Biscayne Bay. The project is expected to be reviewed in more detail in a future CERP Project Implementation Report effort. CERP projects identified in the 1998 Central and Southern Florida Project Comprehensive Review Study ("Yellow Book") that have not received more detailed analysis through a project implementation report are identified as areas that should be avoided for expansion of the UDB in CDMP Policy LU-8G. The Bird Drive Wetlands are also depicted as being within a CERP project footprint, however, this CERP project was not found to be feasible for the purposes envisioned in the 2000 CERP authorization and has not been authorized for construction. There is general consensus that the project as conceptually designed would need to be modified or redesigned based on aquifer characteristics in the area. Alternatives are being considered to recapture some of the anticipated benefits from the Bird Drive Wetlands CERP project.

Areas within the FEMA A Zone are subject to inundation by the base flood. Projects within these areas must incorporate floodproofing techniques and demonstrate that development within the floodway will not increase flooding or that any increases do no impact structures on other properties.

Historical Resources.

Area 2 contains cultural and archaeological resources but no designated historic structures at the time of publication. Designated archaeological sites are located immediately west of the Area 2 boundaries and there are several recorded sites on the Florida Master Site List that is maintained by the Florida State Division of Historical Resources. Recorded sites include prehistoric tree island midden sites. Area 2 is also considered to have a high probability of containing additional archaeological resources, likely prehistoric tree island sites that have yet to be identified or recorded. Tree island archaeological sites may contain unmarked human remains protected under State Statute Section 872.05, Florida's Unmarked Human Burial Act. Prior to any development or ground disturbing activities, a Cultural Resource Assessment Survey (CRAS) may be required in accordance with applicable federal, state and local requirements. Areas with a high probability for the presence of archeological resources are not more or less suitable for the location of future UEAs, and it should be noted that many areas with significant archaeological resources are located in developed areas inside the current UDB. Rather the potential or known presence of archaeological resources is a factor that should be considered in conducting ground-disturbing activities in areas with a high probability of archaeological resources, including rock mining, agriculture and development.

Infrastructure.

The area near and including Urban Expansion Area No. 1 is located within one mile of a planned East-West SMART Plan Corridor station. The majority of areas within the one-mile radius that are not already within an Urban Expansion Area are publicly owned. The areas north of NW 25 Street and the Bird Drive Wetlands fall within one mile of bus routes that currently operate with headways of 20-minute or less, however, CDMP policies noted above identify these areas as being unsuitable for urban growth.

Recommendation for Further Analysis.

[33] National Academies of Sciences, Engineering and Medicine. Progress Toward Restoring the Everglades: The Seventh Biennial Review. 2018.

Area 2 is the location of existing Urban Expansion Area No. 1 which comprises approximately 309 acres. The remaining portions of Area 2 would generally be considered least suitable for future growth as it contains important resources related to the human and ecological health of the County. The areas within Area 2 with the fewest constraints include limestone excavation mines or are in public ownership. Therefore, no areas were identified for further analysis in Area 2.

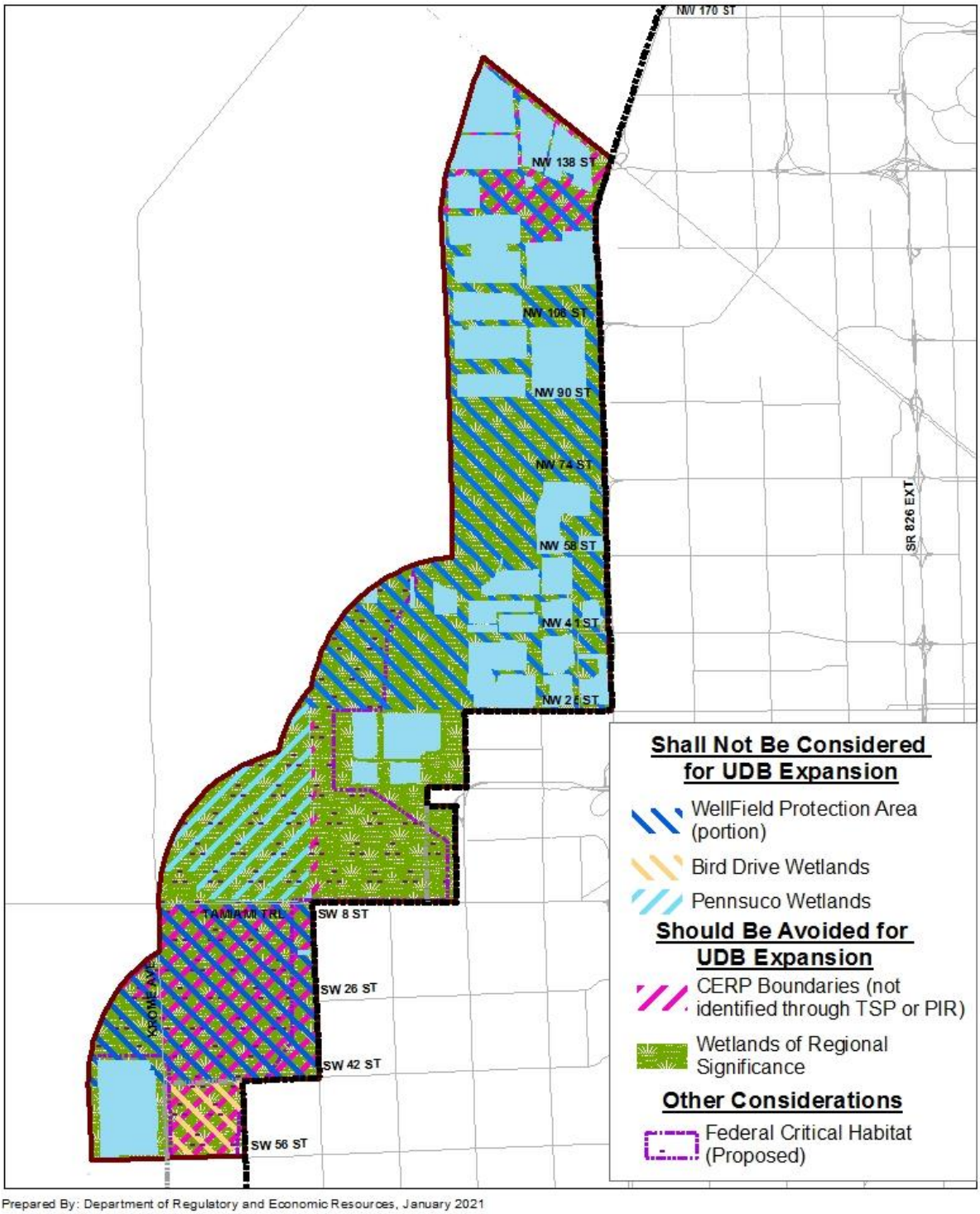


Figure 30
Area 2 - Constraints Map

III. Area 3 – Western Agricultural Area (See Figure 25 for boundaries)

Area 3 includes the western agricultural area which extends from south of the Bird Drive Wetlands to south of Ingraham Highway. The current Urban Expansion Area No. 2 is located within this area. The Redland agricultural area located south of Eureka Drive (SW 184th Street) is identified as an area that shall not be considered for expansion of the UDB. The southern boundary of the Redland area is not defined in the CDMP so it could conceivably be interpreted to include all areas designated Agriculture on the CDMP Land Use Plan Map located south of Eureka Drive which would constitute 68% of Area 3. The remaining agricultural areas located outside of a designated Urban Expansion Area (±23% of Area 3) are identified as areas that should be avoided for expansion of the UDB in CDMP Policy LU-8G. These constraints are depicted on Figure 32.

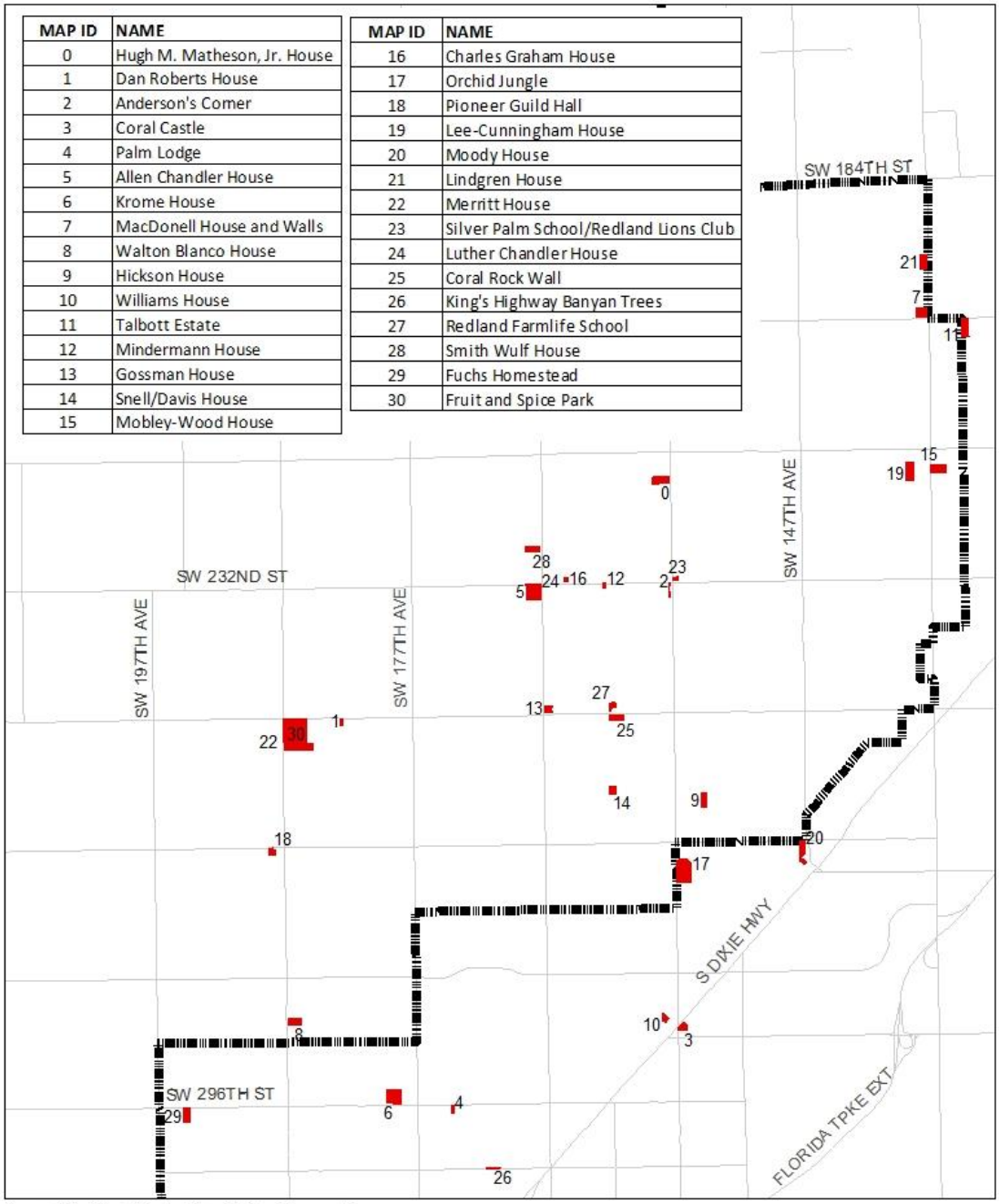
Land Use.
Area 3 is primarily designated Agriculture on the CDMP Land Use Plan Map (see Appendix 1). Allowable uses in the area include agriculture (including ancillary and supportive uses), residences at a maximum density of one dwelling unit per five acres and uses to support the rural residential community including houses of worship. Primary uses in the area include agriculture and rural residences.

Constraints.
Area 3 includes the County's primary agricultural area. The majority of the area is identified as Farmland of Unique Importance by the U.S. Department of Agriculture, Natural Resources Conservation Service (NRCS). Lot sizes within the agricultural area vary greatly. The average lot size of parcels with an agricultural classification north of SW 184th Street is 23.3 acres. For the area between SW 184th Street and SW 296th Street, the average lot size is 6.6 acres. South of SW 296th Street, the average lot size is 9.6 acres. The area north of SW 152 Street includes some of the County's larger agricultural operations and is currently one of the primary areas for cropland.

Homesteading and agricultural production in Redland and Silver Palm (which collectively became known as "Redland") began in the late 1800s. Both of these historic areas are located west of the current South Dixie Highway. The Homestead Act of 1862 allowed US citizens to homestead on 160-acre parcels of public land. Homesteaders acquired the parcels if they lived on the land and produced a crop within a five-year period. Farmers were attracted to south Florida which allowed them to grow a wide variety of exotic fruits that could not be grown in other areas. Prior to the construction of the Miami-Homestead line of the Florida East Coast (FEC) Railway in 1905, the Silver Palm area was reached by a trail that led from the village of Cutler on Biscayne Bay. The historic core of the Silver Palm community is located northwest of the Study Area at the intersection of Silver Palm Drive and Newton Road where Will Anderson's 1911 general merchandise store, Lowry Anderson's blacksmith shop and the 1904 Silver Palm schoolhouse were situated. Most designated historic structures associated with the Redland community are located between SW 184th Street and SW 312th Street as depicted on Figure 31.

MAP ID	NAME
0	Hugh M. Matheson, Jr. House
1	Dan Roberts House
2	Anderson's Corner
3	Coral Castle
4	Palm Lodge
5	Allen Chandler House
6	Krome House
7	MacDonell House and Walls
8	Walton Blanco House
9	Hickson House
10	Williams House
11	Talbott Estate
12	Mindermann House
13	Gossman House
14	Snell/Davis House
15	Mobley-Wood House

MAP ID	NAME
16	Charles Graham House
17	Orchid Jungle
18	Pioneer Guild Hall
19	Lee-Cunningham House
20	Moody House
21	Lindgren House
22	Merritt House
23	Silver Palm School/Redland Lions Club
24	Luther Chandler House
25	Coral Rock Wall
26	King's Highway Banyan Trees
27	Redland Farmlife School
28	Smith Wulf House
29	Fuchs Homestead
30	Fruit and Spice Park



Source: Miami-Dade County Office of Historic Preservation

Figure 31: Historic Properties in the Redland Agricultural Area

The West Wellfield, which is located in UEA No. 2, was originally proposed as a 140 MGD wellfield. However, due to concerns regarding the impact of wellfield drawdown on hydrologic resources of Everglades National Park, a Memorandum of Understanding between the County, SFWMD, FDEP and the US Department of the Interior was executed to limit withdrawals at the West Wellfield to a peak pumpage of 40 MGD. The County is permitted under the current 20-year Water Use Permit (#13-00017-W) to withdrawal 15 MGD from the Biscayne Aquifer at the West

Wellfield. To protect water quality at the County's wellfields, Chapter 24 also includes limitations on sewage loading within the cones of influence. These restrictions may limit the amount of development that can be achieved on a given site.

Approximately 300 acres in the area south of UEA No. 2 and north of SW 152nd Street includes areas within the Outer Safety Zone and Runway Protection Zone for Miami Executive Airport. New residential construction, educational facilities, hospitals, religious facilities, and other buildings for public assemblage, are prohibited within these zones. Additionally, the area located just north of Bauer Drive south to SW 320th Street, west of SW 202nd Avenue, lies within the outer noise contour for Miami Homestead General Aviation Airport. New residential construction and educational facilities, excluding aviation-related schools, are prohibited within the full extent of the noise contour depicted on Figure 15 of this report.

The area north of SW 152 Street is located within a FEMA Special Flood Hazard Area. Areas within the FEMA A Zone are subject to inundation by the base flood. Projects within these areas must incorporate floodproofing techniques and demonstrate that development within the floodway will not increase flooding or that any increases do no impact structures on other properties.

Historical Resources.
Area 3 contains cultural and archaeological resources and a number of designated historic structures, as identified in Figure 31. Recorded sites are kept on file with the Florida Master Site List, maintained by the Florida State Division of Historical Resources. The portion of Area 3 located within the Bird Drive Wetlands is considered to have a high probability of containing additional archaeological resources, likely prehistoric tree island sites that have yet to be identified or recorded. Tree island archaeological sites may contain unmarked human remains protected under State Statute Section 872.05, Florida's Unmarked Human Burial Act. The remaining areas are considered to have a low probability of containing archaeological resources. While it is possible that previously unrecorded archaeological resources could be found in this area, there is a low likelihood, based on part on the level of ground disturbance that has occurred in this area already. Prior to development activities, a Cultural Resource Assessment Survey (CRAS) may be required in accordance with applicable federal, state and local requirements. Areas with a high probability for the presence of archeological resources are not more or less suitable for the location of future UEAs, and it should be noted that many areas with significant archaeological resources are located in developed areas inside the current UDB. Rather the potential or known presence of archaeological resources is a factor that should be considered in conducting ground-disturbing activities in areas with a high probability of archaeological resources, including rock mining, agriculture, and development.

Infrastructure.
The areas located within one mile of premium transit corridors are depicted on Figure 22 of this report and summarized below:

- As depicted on Figure 22, portions of the area are located within one mile of express bus routes located at SW 104th Street (Killian Kat) and SW 152nd Street (Coral Reef Max). These routes currently provide service with headways of 20-minutes or less. Future operational changes on these routes could lead to increases in the headways.
- A portion of Area 3 is located near the South Dade Transitway, a 20-mile exclusive busway that operates local and limited stop Metrobus service between the Dadeland South Metrorail

Station and Florida City. The South Dade Transitway Corridor has been identified as one of the six rapid transit corridors in the SMART (Strategic Miami Area Rapid Transit) Plan. The Miami-Dade County Transportation Planning Organization adopted Resolution No. 31-18 which established the locally preferred alternative for the corridor. It provides for an enhanced bus rapid transit system with further direction to take all necessary steps to convert from bus rapid transit to at-grade Metrorail upon reaching an average weekday ridership of 35,000 daily trips. A small area located south of the UDB also falls within one mile of the southern terminus of the South Dade Transitway SMART Plan Corridor.

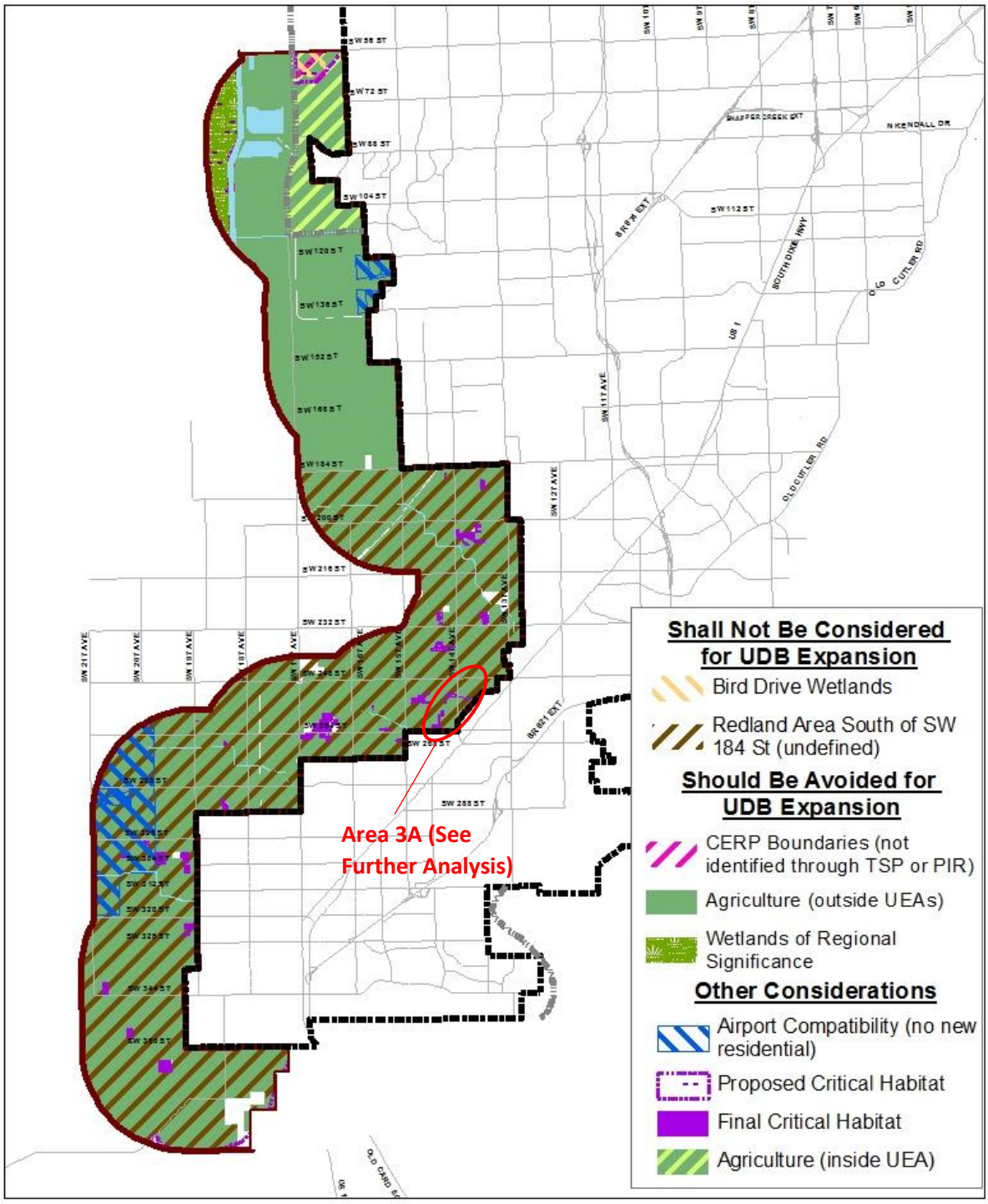
Recommendation for Further Analysis. The area generally located within one-half mile of the South Dade Transitway SMART Plan Corridor (Area 3A) was identified for further analysis due to its ability to support a significant amount of residential capacity with minimal loss of agricultural land. It is estimated that the ±596.5-acre area has the capacity to support over 17,000 units which represents over 1.7 years of residential capacity. The analysis for this area is provided on Page 82 of this report.

While some areas located between UEA No. 2 and SW 184th Street could support residential or non-residential development, the area contains constraints that would affect the development potential. Approximately 300 acres in the area is located within the Outer Safety and Runway Protection Zones for Miami Executive Airport. In 2019, the Board adopted airport land use compatibility standards to address airport operational matters, Florida statutory changes, and Federal Aviation Administration guidance. The regulations prohibit new residential construction, educational facilities, hospitals, religious facilities, and other buildings for public assemblage within the Outer Safety Zone and Runway Protection Zone for the County airports. Therefore, these areas would not be eligible for residential density increases.

As depicted on Figure 22, portions of the area are located within one mile of express bus routes located at SW 104th Street (Killian Kat) and SW 152nd Street (Coral Reef Max), however the area is not served by high-capacity transit. The Kendall Parkway extension of State Road 836, as adopted by BCC Ordinance No. 18-109, may bring rapid transit options to the area. However, the Kendall Parkway approval is the subject of an administrative challenge and will not become effective unless the approval is upheld. Therefore, the remaining area between UEA No. 2 and SW 184th Street would only be expected to support densities that are close to the minimum allowable for UDB expansion applications (10 du/acre). At these densities, 1,000 acres would be depleted to supply one year of residential capacity. Thus development in the area could result in significant depletion of agricultural land. In order to achieve the residential capacity that could be accommodated within the analysis area along the South Dade Transitway (Analysis Area 3A), approximately 1,700 acres of agriculturally designated land would be impacted. This is significantly greater than the 597 acres that would potentially be impacted along the South Dade Transitway to achieve the same capacity.

The area north of SW 152nd Street and a large portion of the area between SW 152nd Street and SW 184th Street currently contains agricultural uses. The area, particularly north of SW 152 Street, includes the County's larger agricultural operations and is currently one of the primary areas for cropland. The average lot size of parcels with an agricultural classification in this area is 23.3 acres, while the average lot size south of SW 184th Street is only 6.6 acres. Loss of agricultural land in this area may have detrimental impacts to the diversity of the County's agricultural industry.

Minimizing the loss of agricultural land is a key consideration within Area 3. CDMP Policy LU-1R states, in part, that Miami-Dade County shall take steps to reserve the amount of land necessary to maintain an economically viable agricultural industry. A 2002 study by County planning staff found that 52,000 acres are needed to maintain an economically viable industry. There are approximately 64,287 acres identified as Farmland of Unique Importance by the U.S. Department of Agriculture in the area designated “Agriculture” on the CDMP Land Use Plan Map. Within this area, parcels with an agricultural classification from the Miami-Dade County Property Appraiser comprise approximately 53,000 acres. This acreage is important because it represents the properties that contain agricultural uses within the area best suited for agricultural production due to the soil capacity and land use. The remaining acreage within the area identified as Farmland of Unique Importance may be used for purposes other than agriculture or in public ownership. However, it is important to note that the data used in the 2002 study is twenty years old. The County would benefit from an update utilizing more current data.



Prepared By: Department of Regulatory and Economic Resources, January 2021

Figure 32

Area 3 - Constraints Map

Detailed Analysis Area 3A.

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A ±596.5-acre area along the South Dade Busway was identified for further analysis (See Figure 33). This area was selected due to its proximity to the South Dade Transitway SMART Plan corridor. The presence of this high-volume transit service would allow the area to accommodate a significant amount of residential capacity with minimal loss of agricultural land. Important considerations in the area include protection of Natural Forest Communities that provide habitat to federal and state designated species as well as impacts to agricultural lands located in the Redland agricultural area.

The area is located along the South Dade Transitway which has been identified as one of six rapid transit corridors in the SMART (Strategic Miami Area Rapid Transit) Plan. The Miami-Dade County Transportation Planning Organization adopted Resolution No. 31-18 which established the locally preferred alternative for the South Dade Transitway. It provides for an enhanced bus rapid transit system with further direction to take all necessary steps to convert from bus rapid transit to at-grade Metrorail upon reaching an average weekday ridership of 35,000 daily trips.

A distance of one-half mile is typically considered ideal for multi-modal access to transit service. To promote transit-oriented development along the rapid transit corridors, the CDMP contains policies that provide for the development of moderate to high density, design-unified urban centers within one-half mile of rapid transit stations. The CDMP permits densities up to 125 dwelling units per acre within Community Urban Centers with densities tapering down in areas located farther from the transit hub. In addition, the areas along planned rapid transit corridors located between designated urban centers are permitted densities up to 60 dwelling units per acre within one-quarter mile of the corridor and 36 dwelling units per acre between one-quarter mile and one-half mile of the corridor for mixed-use projects. Figure 34 depicts the areas that are located within the radius of a Community Urban Center and along the SMART Plan corridor. If these areas were to be brought into the Urban Development Boundary, they would be eligible for densities in accordance with the aforementioned mixed-use development text of the CDMP. Based on these densities. It is estimated that the area has the capacity to support over 17,000 units which represents over 1.7 years of residential capacity.[34]

The area is within Redland agricultural area which includes a larger area south of SW 184th Street (Eureka Drive). CDMP Policy LU-8G currently identifies the Redland area as an area that shall not be considered for expansion of the UDB. Historically-designated structures in the Redland area are depicted on Figure 31. There are no designated structures located within Detailed Analysis Area 3A. If this area is considered for future designation as an Urban Expansion Area, an exception should be included in Policy LU-8G for portions of the Redland located within a designated UEA.

The area includes pockets of designated habitat for the federally-endangered Bartram's Scrub-Hairstreak Butterfly, as depicted on Figure 35. The Bartram's scrub-hairstreak butterflies occur only within pine rocklands, specifically those with pineland croton, the only known hostplant for the butterflies. The Florida Natural Areas Inventory identifies pine rockland as "critically imperiled

[34] Estimated maximum capacity is based on average density of 45 du/ac for areas within the Urban Center radius and maximum density for mixed use projects within ½ mile of the SMART Plan corridor.

globally" due to its rarity and high risk of extinction. Historically, these habitats covered approximately 180,000 acres in South Florida and today have been reduced to about 3,000 acres due to development and agriculture.[35] CDMP Policy LU-3B states, in part, that all significant natural resources and systems shall be protected from incompatible land use including forested portions of Environmentally Sensitive Natural Forest Communities as identified in the Natural Forest Inventory.

In response to a prior policy in the CDMP, the Miami-Dade County Planning Division previously reviewed a 920-acre area for designation as an Urban Expansion Area that included a portion of Detailed Analysis Area 3A. A report summarizing the County's analysis was transmitted to the Board on August 26, 2019. The analysis included two public meetings that identified community concerns including; impacts to the rural character of the area, loss of agricultural land, inadequate infrastructure and services to support new growth, as well as additional traffic congestion. Many of the concerns expressed by the community could be resolved through implementation of the SMART Plan, as well as policies requiring infrastructure improvements and buffering to agricultural and rural land.

After considering the input from the community and the recommendation from the Urban Expansion Area Task Force that no new UEAs be designated, the report concluded that the area should not be designated as an Urban Expansion Area at that time. However, the report also concluded that designation of the area as an Urban Expansion Area may need to be reassessed in the future if it is found that the County's efforts to increase densities inside the current UDB prove insufficient to accommodate projected demand (as required by state law and CDMP Policy LU-8F) and if unconstrained land inside the current UEAs is not adequate to accommodate the need for additional urban land. Once the Board identifies the need for additional Urban Expansion Areas to be designated, reconsideration of this area would be warranted.

As depicted in Figure 34, there are currently agriculturally designated areas outside of the UDB that abut Urban Centers where densities up to 125 dwelling units are permitted. Conflicts can occur where agricultural activities occur near developed areas. Conflicts primarily arise from pesticide spray drift, odor, noise, and farm traffic. These conflicts are more pronounced with large-scale vegetable production operations that rely on aerial application of pesticides. Tapering down of densities and additional buffering between the urban and agricultural land uses would reduce the potential for conflicts.

Within Detailed Analysis Area 3A, there are five parcels that are located partially inside and partially outside of the UDB. These split parcels are depicted on Figure 33 and described below.

Parcel 1 – Parcel 1, as identified on Figure 33, is a ±24.8-acre parcel that is bifurcated by the UDB, thus placing the northern ±10.5-acre portion of the parcel outside of the UDB and the southern ±14.3 acres of the parcel inside of the UDB. The Land Use Plan (LUP) map of the CDMP designates the ±10.5-acres located outside of the UDB as "Agriculture" and the remaining ±14.3 acres inside the UDB as "Industrial and Office". On July 12, 1956 the Board of County Commissioners (BCC) adopted Resolution No. 10011, which rezoned the property from AU to IU-1 (Light Manufacturing). In 2005, the southernmost approximately 4.7-acres of the property were included within the boundaries of the

[35] Miami-Dade County Division of Environmental Resources Management.

Princeton Community Urban Center (PCUC) and designated “ID” (Industrial District) on the Land Use Plan on the PCUC district regulations.

Following application by the owner of the subject property, the Board of County Commissioners adopted a change to the interpretive text of the CDMP in 2018 that allowed for the full range of IU-1 uses on the property with limitations. The CDMP text, as included below, applies solely to the subject property:

> “*It is provided, however, that existing parcels that: a) have existing lawful zoning of IU-1 (Industry-Light) since November 29, 1988; and b) are bifurcated by the UDB; and c) have any portion of the parcel located within a designated urban center, may be developed with any of the industrial uses permitted in the IU-1 zoning district, as long as adequate buffering and drainage is provided to limit impacts to adjacent agriculturally-designated properties.”*

To offset the loss of agricultural land associated with the aforementioned application, the property owner proffered a Declaration of Restrictions for a 10.5-acres portion of a property located at the northeast corner of SW 207 Avenue and SW 272 Street that limits the allowable uses to agriculture, agricultural production, ranching, forest management, timber harvesting, and farming. Residential uses are prohibited.

Parcel 2 – Parcel 2, as identified on Figure 33, is bifurcated by the Urban Development Boundary with ±16.3 acres being located inside of the UDB and ±49.4 acres being located outside of the UDB. The property owner has submitted an application for a 518-unit multi-family residential development on the portion of the property located inside of the UDB. No changes are proposed to the portion of the property located outside of the UDB. The application is currently under review.

Parcel 3 – Parcel 3, as identified on Figure 33, is bifurcated by the Urban Development Boundary with ±2.8 acres being located inside of the UDB and ±16.9 acres being located outside of the UDB. The property has an active agricultural use and no development plans have been submitted to date.

Parcels 4 and 5 – Parcel 4, as identified on Figure 33, is bifurcated by the Urban Development Boundary with ±5 acres being located inside of the UDB and ±0.1 acres being located outside of the UDB. Parcel 5, as identified on Figure 33, is bifurcated by the Urban Development Boundary with ±4.3 acres being located inside of the UDB and ±8.9 acres being located outside of the UDB. The properties received administrative site plan approval for a 175-unit residential development on the portion of the properties located inside of the UDB. The approval included a condition that requires the portion of the property zoned IU-C located outside of the UDB to be maintained as open space in accordance with the submitted site plan.

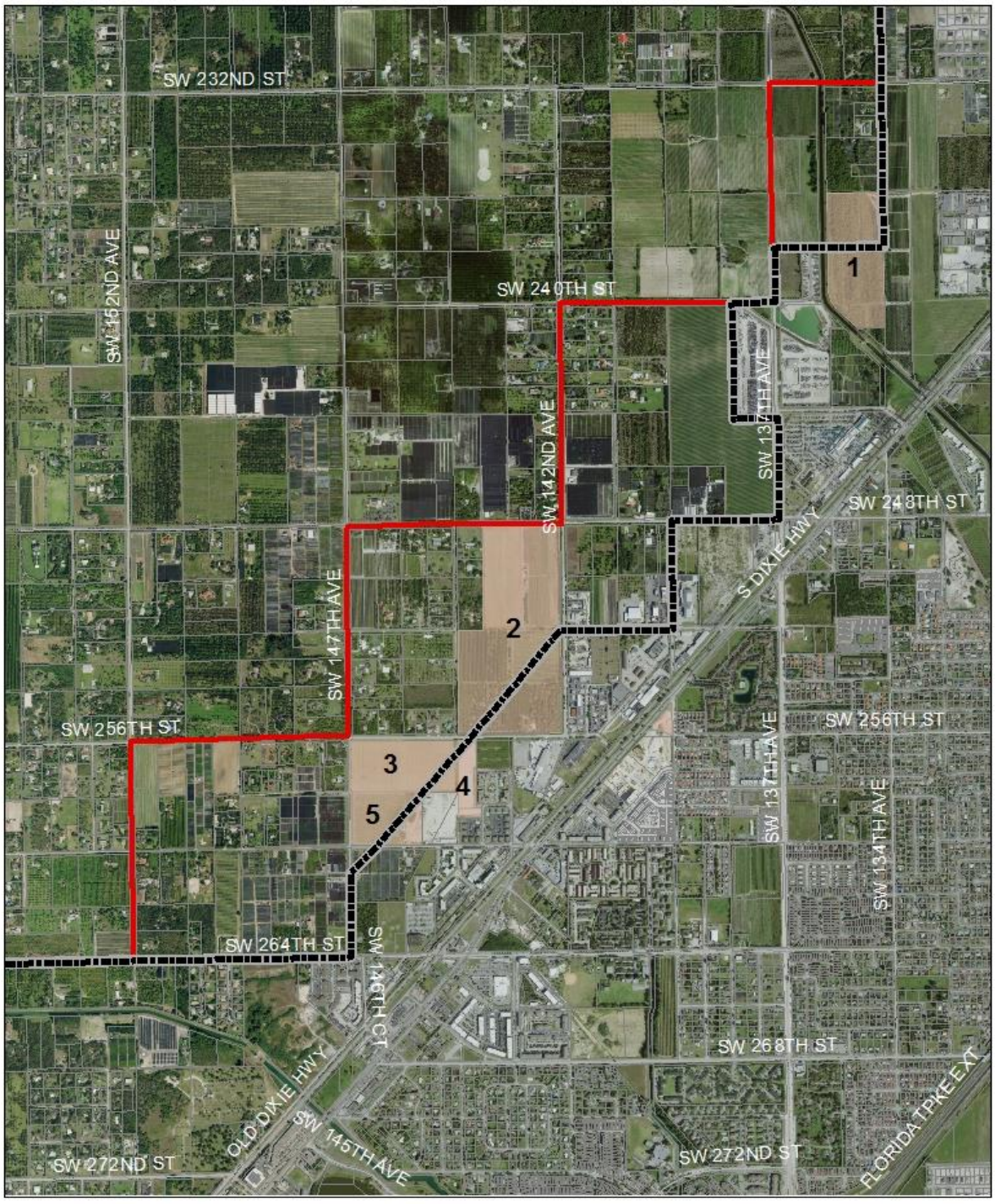


Figure 33

Detailed Analysis Area 3A Boundary

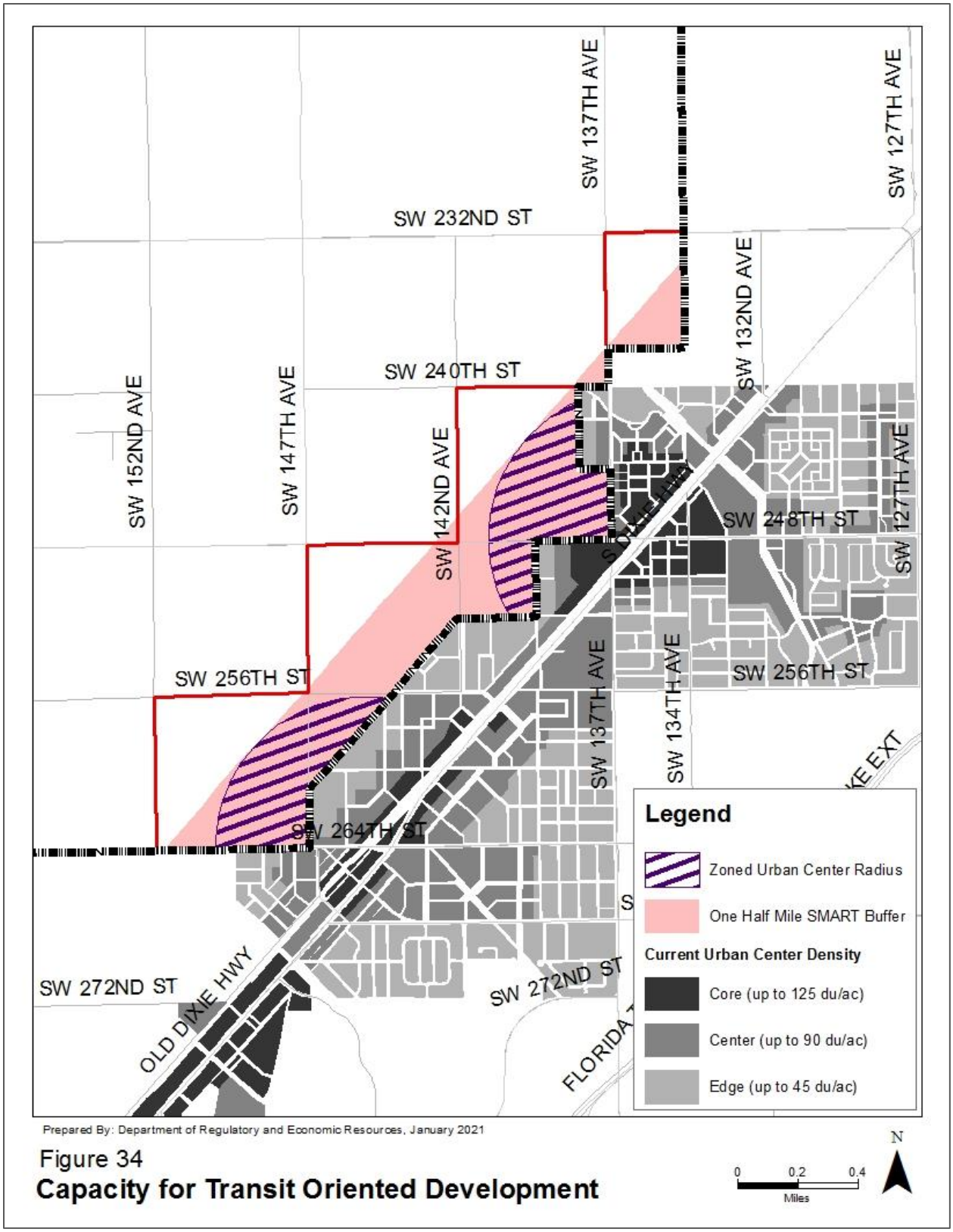


Figure 34
Capacity for Transit Oriented Development

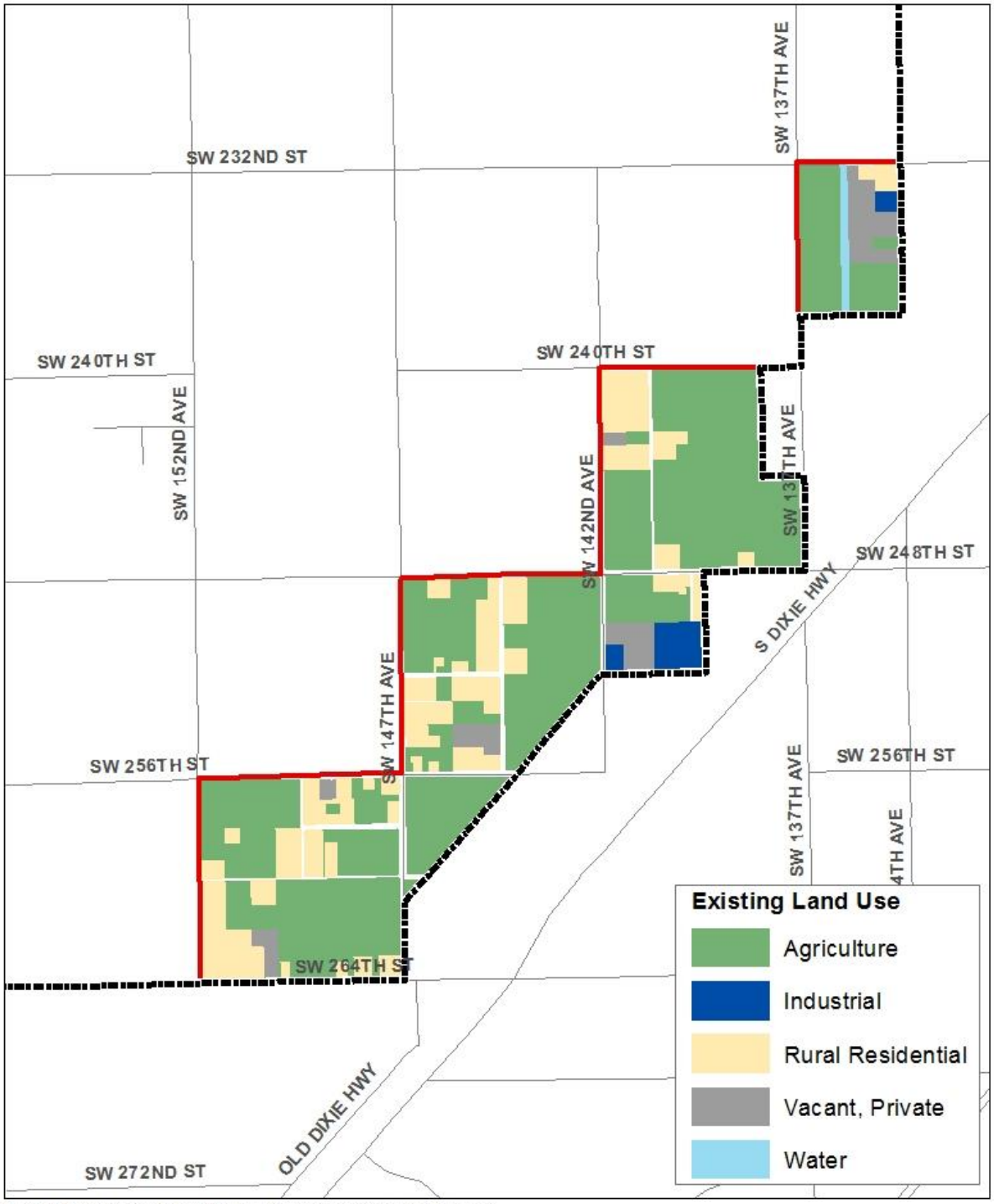
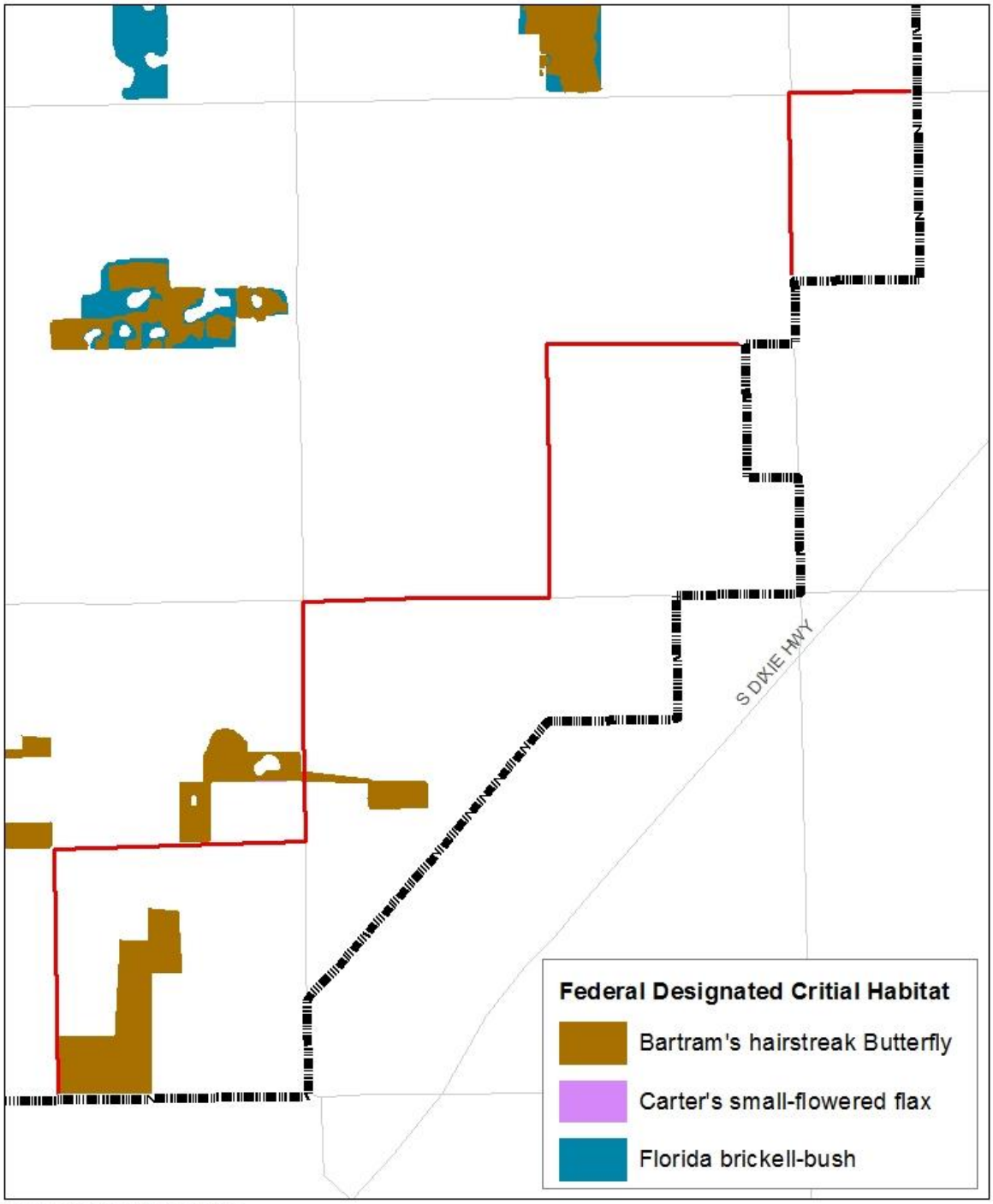


Figure 35

Existing Land Use



* Source: US Fish and Wildlife Service

Figure 36

Federal Designated Critical Habitat

IV. Area 4 - South Dade Wetlands (See Figure 25 for boundaries)

Area 4 is primarily comprised of high-quality Wetlands of Regional Significance, most of which are also within the footprint of the Biscayne Bay Coastal Wetlands (BBCW) Phase II Comprehensive Everglades Restoration Plan (CERP) project. Areas within the BBCW Phase II CERP project, which comprise ±90% of Area 4, are identified as areas that shall not be considered for expansion of the UDB in CDMP Policy LU-8G. These constraints are depicted on Figure 37.

Land Use.
The majority of Area 4 is designated "Environmental Protection" on the CDMP Land Use Plan Map and includes land within Subareas C (Canal-111 Wetlands) and D (Southeast Wetlands). Uses in these areas are subject to case-by-case evaluation due to the environmental sensitivity of the areas. Other designations in the area include a small area along the UDB designated Agriculture and a small area of active rockmining that is designated Open Land (Subarea 5) on the CDMP Land Use Plan Map.

Constraints.
Approximately 90% of Area 4 is located within the BBCW Phase II CERP project footprint. The BBCW project aims to improve the ecology of Biscayne National Park and Biscayne Bay by rehydrating coastal wetlands, reducing freshwater point source discharges, and redistributing surface water through a spreader canal system. This is considered to be a critical project to South Florida ecosystem restoration due to its potential to substantially improve the biological integrity and stability of the coastal ecosystem.[36] Areas within the BBCW Phase II CERP project are identified as areas that shall not be considered for expansion of the UDB in CDMP Policy LU-8G The boundaries of the Wetlands of Regional Significance mostly correspond with the CERP project footprint in Area 4. Wetlands of Regional Significance are identified as areas that should be avoided for expansion of the UDB in CDMP Policy LU-8G. Wetlands in this area serve the important functions of preventing saltwater intrusion into the wellfields and attenuating storm surge. The wetland areas also serve as habitat for federal and state designated species, including the Florida Panther and Bonneted Bat. With the exception of a small area just south of the UDB, the entire area has been placed on the County's Environmentally Endangered Lands (EEL) Acquisition List. The South Dade Wetlands were placed on the EEL acquisition list in 1993 and the County has actively worked since that time, along with state and federal partner agencies, to acquire land within this area.

A portion of the area is within the Primary Zone for the endangered Florida Panther. While U.S. Fish and Wildlife Service (FWS) has not designated critical habitat for the Florida Panther, it has identified a series of zones that are considered important to supporting the protection and expansion of panther populations. The Florida Panther Recovery Plan (March 1995) establishes the goal of maintaining the quantity and quality of habitat in the Primary Zone. Portions of the area are also proposed to be designated as critical habitat for the Florida Bonneted Bat by FWS. The designation focuses on large connected natural areas which are relatively free of human disturbances. Based on analysis from FWS, the perpetuation of the Florida Bonneted Bat could be negatively impacted by land use changes that introduce human activity into the natural areas that have been identified as critical habitat to the survival of the species.

[36] Central and Southern Florida Project Comprehensive Review Study. US Army Corps of Engineers. 1998

Portions of the area are located within a FEMA Special Flood Hazard Area and the Coastal High Hazard Area (CHHA) which state law defines as the area vulnerable to storm surge from a Category 1 storm event. CDMP Policy LU-8G identifies the Coastal High Hazard Area (CHHA) as an area that shall not be considered for expansion of the Urban Development Boundary for residential land uses due to the public safety risks of placing additional population in the area vulnerable to destructive storm surge. CDMP Policy CM-9A states that development and redevelopment activities in the CHHA shall be limited to those land uses that have acceptable risks to life and property and includes a series of guidelines that encourage development density and intensity to be maintained at current levels within the CHHA.

Historical Resources.
Area 4 is considered to have a low probability of containing archaeological resources, but could contain isolated prehistoric sites that have yet to be identified. Potential sites may include prehistoric sites in areas with higher elevations. Archaeological sites may contain unmarked human remains protected under State Statute Section 872.05, Florida's Unmarked Human Burial Act. Prior to any development or ground disturbing activities, a Cultural Resource Assessment Survey (CRAS) may be required in accordance with applicable federal, state and local requirements.

Other Considerations.
Portions of Area 4 are also within the municipal boundaries of Homestead and Florida City. As noted in the Background section (Chapter 1) of this report, the County retains jurisdiction over the UDB line and land uses outside of the UDB even when located within a municipality. A small portion also falls within one mile of the southern terminus of the South Dade SMART Plan Corridor.

Recommendation for Further Analysis.
Areas 4 would generally be considered least suitable for future growth as it contains important resources related to the human and ecological health of the County. No areas were identified for further analysis in Area 4.

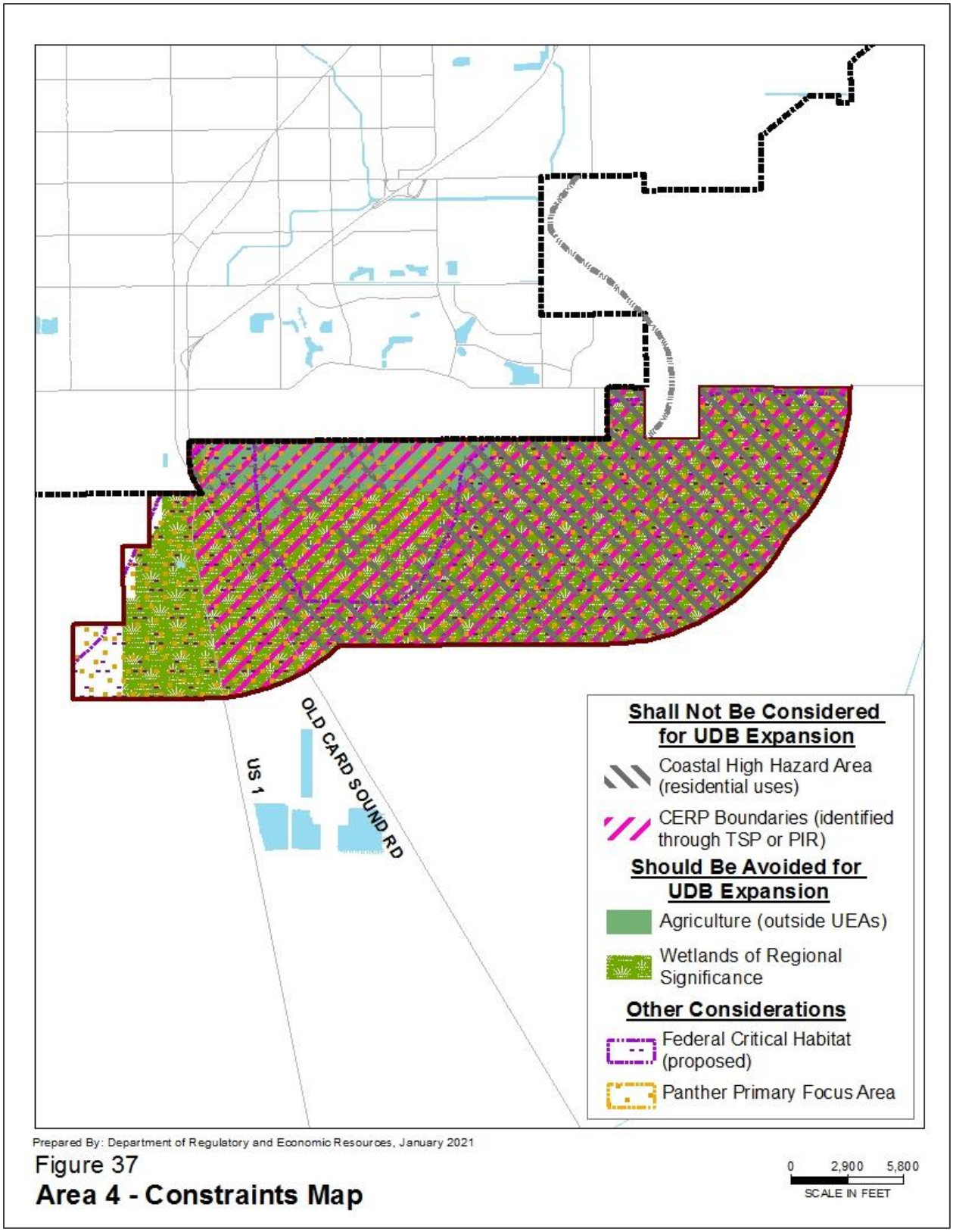


Figure 37

Area 4 - Constraints Map

Area 5 - East Glade and Coastal Wetlands (See Figure 25 for boundaries)

The eastern portion of this area is within the Biscayne Bay Coastal Wetlands (BBCW) CERP project. In addition, Area 5 includes areas within the Accident Potential Zones of the Homestead Air Reserve Base. These areas, which comprise ±66% of Area 5, are identified as areas that shall not be considered for expansion of the UDB in CDMP Policy LU-8G. The majority of Area 5 is located within the Coastal High Hazard Area which state law defines as the area vulnerable to storm surge from a Category 1 storm event. CDMP Policy LU-8G identifies the Coastal High Hazard Area (CHHA) as an area that shall not be considered for expansion of the Urban Development Boundary for residential land uses. Area 5 also includes Wetlands of Regional Significance and land designated Agriculture (located outside of a designated UEA) which are identified as areas that should be avoided for expansion of the UDB in CDMP Policy LU-8G. These constraints are identified on Figure 38.

Land Use.
The western portion of Area 5 is designated "Agriculture" which generally allows agriculture (including ancillary and supportive uses), residences at a maximum density of one dwelling unit per five acres and uses to support the rural residential community including houses of worship. CDMP Amendment No. 4 in the May 2019 Cycle allowed for commercial truck parking facilities in ±240-acres located west of the South Dade Landfill. A portion is also designated Open Land (Subarea 5). Future uses that may be considered for approval in this area generally include seasonal agriculture, limestone quarrying and utility facilities, and residences at a maximum density of 1 dwelling unit per 5 acres. The area of the South Dade Landfill is designated 'Institutions, Utilities and Communications'. The eastern portion of Area 5 is designated "Environmental Protection (Subarea 5)" and "Environmentally Protected Parks" on the CDMP Land Use Plan Map.

Constraints.
The goal of the Biscayne Bay Coastal Wetland (BBCW) CERP project is to improve the ecology of Biscayne National Park and Biscayne Bay by rehydrating coastal wetlands, reducing freshwater point source discharges, and redistributing surface water through a spreader canal system. Areas within the CERP footprint are identified as areas that shall not be considered for expansion of the UDB in CDMP Policy LU-8G. BBCW is considered to be a critical project to South Florida ecosystem restoration. UEA Nos. 3 and 4 currently include portions of the BBCW CERP project. These areas have been proposed for exclusion in staff application May 2019 CDMP Cycle, Application No. 5. Consideration of the proposed contractions is on-hold, pending release of this Study.

The area also includes mangrove wetlands which help to protect inland areas from coastal storm surge by providing surge attenuation. The eastern portion of this area is identified as Wetlands of Regional Significance on Figure 14 of the CDMP Land Use Element which are identified as areas that should be avoided for expansion of the UDB in CDMP Policy LU-8G. Wetlands in this area serve the important functions of preventing saltwater intrusion into the wellfields and attenuating storm surge. The wetland areas also serve as habitat for federal and state designated species, including the Florida Panther and Bonneted Bat. With the exception of a small area just south of the UDB, the entire area has been placed on the County's Environmentally Endangered Lands (EEL) Acquisition List. The South Dade Wetlands were placed on the EEL acquisition list in 1993

and the County has actively worked since that time, along with state and federal partner agencies, to acquire land within this area.

This area contains Accident Potential Zones associated with the Homestead Air Reserve Base (HARB) which are identified as areas that shall not be considered for expansion of the UDB in CDMP Policy LU-8G. The accident potential zones represent the areas with potential for aircraft accidents and are comprised of three zones; Clear Zone, Accident Potential Zone I (APZ I), and Accident Potential Zone II (APZ II). The HARB accident potential zones currently extend into UEA Nos. 3 and 4 but have been proposed for exclusion in staff application May 2019 CDMP Cycle, Application No. 5. Consideration of the proposed contractions is on-hold, pending release of this Study.

State law defines the Coastal High Hazard Area (CHHA) as the area vulnerable to storm surge from a Category 1 storm event. CDMP Policy LU-8G identifies the CHHA as an area that shall not be considered for expansion of the Urban Development Boundary for residential land uses due to the public safety risks associated with placing additional population in the area vulnerable to destructive storm surge. CDMP Policy CM-9A states that development and redevelopment activities in the CHHA and Hurricane Vulnerability Zone (areas vulnerable to storm surge from a Category 3 storm event) shall be limited to those land uses that have acceptable risks to life and property and includes a series of guidelines that encourage development density and intensity to be maintained at current levels within the CHHA.

Area 5 includes land identified as Farmland of Unique Importance by NRCS. The area is made farmable by seasonal drawdowns of the water table administered by the South Florida Water Management District. Future operational changes to the seasonal drawdown may negatively impact agriculture in this area. This area includes some of the larger agricultural parcels in the County, with an average lot size of 24 acres for parcels with an agricultural classification by the Miami-Dade County Property Appraiser. Currently, major agricultural products produced in the area include nurseries and cropland. Land designated “Agriculture” on the CDMP Land Use Plan Map, located outside of a designated Urban Expansion Area, is identified as an area that should be avoided for expansion of the UDB in CDMP Policy LU-8G.

A portion of the area is within the Primary Zone for the endangered Florida Panther. While USFWS has not designated critical habitat for the Florida Panther, it has identified a series of “zones” that are considered important to supporting the protection and expansion of panther populations. The Florida Panther Recovery Plan (March 1995) establishes the goal of maintaining the quantity and quality of habitat in the Primary Zone.

Historical Resources.
Area 5 is considered to have a low probability of containing archaeological resources, but could contain isolated prehistoric sites that have yet to be identified. Archaeological sites may contain unmarked human remains protected under State Statute Section 872.05, Florida’s Unmarked Human Burial Act. Prior to any development or ground disturbing activities, a Cultural Resource Assessment Survey (CRAS) may be required in accordance with applicable federal, state and local requirements.

Infrastructure.
There are no current or planned transit corridors that provide premium transit to this area. A planned Bus Express Rapid Transit (BERT) corridor passes near UEA No. 3, but no stops are currently planned for the area.

Recommendation for Further Analysis.
Current Urban Expansion Area Nos. 3 and 4 are located within Area 5. The eastern portion of Area 5 would generally be considered least suitable for future growth as it contains important resources related to the human and ecological health of the County. No additional Urban Expansion Areas are recommended for this area.

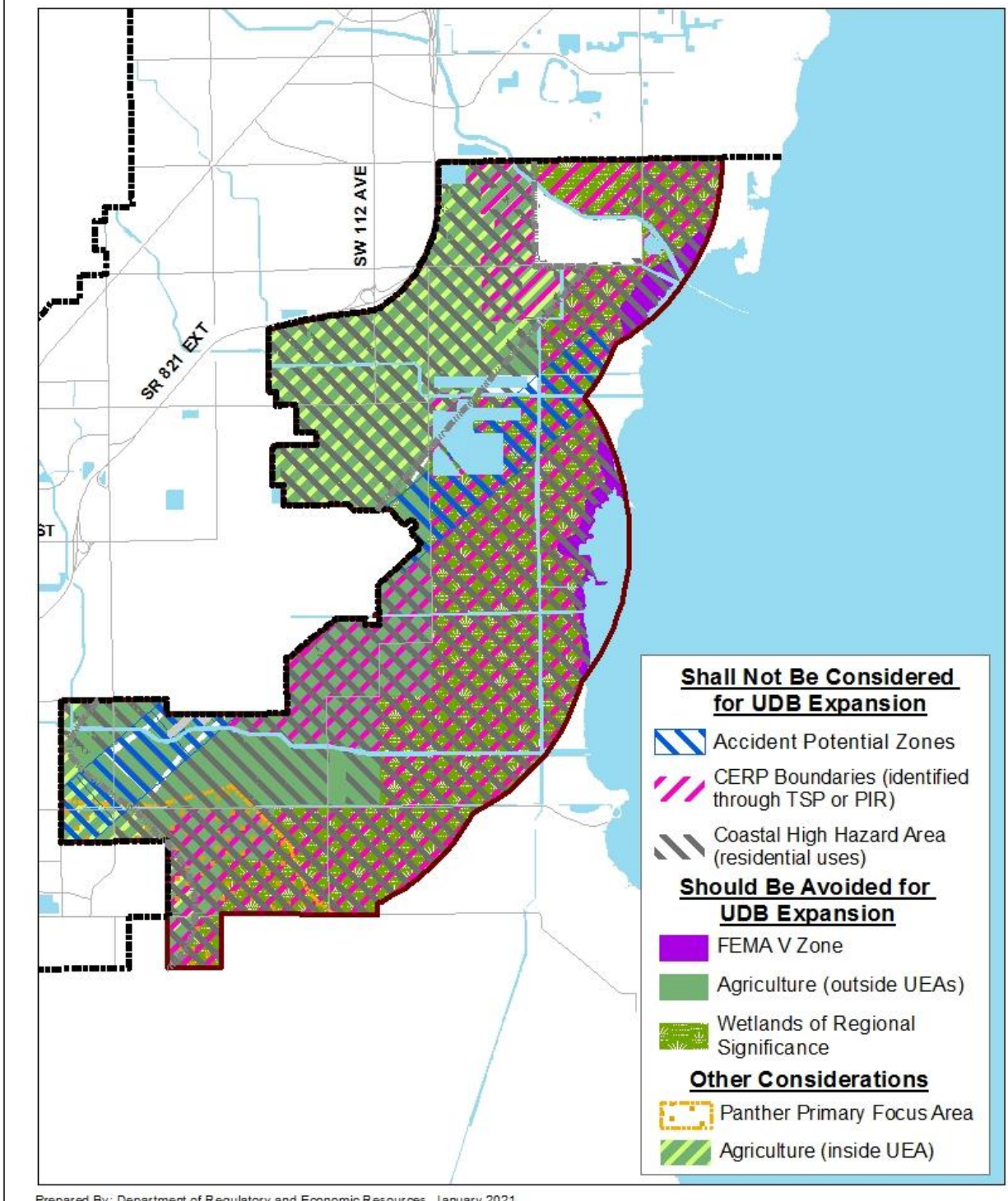


Figure 38

Area 5 - Constraints Map

Chapter 4

Recommendations

Recommendations

CDMP Policy LU-8J, to which this report responds, directs the study to address additional areas that may be identified as Urban Expansion Areas (UEA), with a goal of replacing the 1,993 acres that were proposed for removal in Application No. 5 of the Evaluation and Appraisal Report Amendments in the May 2019 CDMP Amendment Cycle. As was detailed in Chapter 1 (Background) of this report, there is sufficient residential capacity within the UDB beyond 2040, which is beyond the County's short-term and long-term planning horizons. In addition, there are approximately 2,000 acres in the current UEAs (including contractions proposed in Application No. 5 of the May 2019 Cycle) that are generally suitable for residential development which represents approximately two years of additional capacity. Within the UDB, there is sufficient capacity of industrial land countywide and within each analysis tier beyond 2040, except for the South-Central Tier which has a projected depletion year of 2030. In addition, there are approximately 2,700 acres in the current UEAs (including contractions proposed in Application No. 5 of the May 2019 Cycle) that are generally suitable for non-residential uses.

For these reasons, no additional Urban Expansion Areas are recommended at this time. Once the need exists to identify additional Urban Expansion Areas, the County should look to areas with fewer constraints and good access to infrastructure such as Detailed Analysis Areas 1A (±1,398.8 acres) and 3A (±596.5) as assessed in Chapter 3 of this report. Together, these areas are roughly equivalent to the acreage proposed for contraction in Application No. 5 of the May 2019 CDMP Amendment Cycle. As is apparent from the Policy Considerations (Chapter 2) of this report, all areas outside of the Urban Development Boundary (UDB) contain constraints and new growth beyond the current UDB will require policy trade-offs. However, policies specifically addressing these issues can ameliorate associated impacts. Recommendation Nos. 1 and 2 provide recommended measures to address potential impacts associated with growth into new Urban Expansion Areas that may be identified in the future.

CDMP Policy LU-8J also directs the study to address potential additional uses that would be appropriate for the Urban Expansion Areas, particularly near the Homestead Air Reserve Base. Identifying additional uses that may be allowed without expanding the UDB must be balanced against the future growth potential of the UEAs for urban development. Given that the UEAs represent areas that have been identified for future urban growth, the types of uses permitted in the UEAs in the interim should not create a conflict with that potential future growth. Additional uses near HARB must also be carefully analyzed to ensure that they do not negatively impact the future viability of the military installation. Recommendations Nos. 3 and 4 address the second portion of the policy by recommending the incorporation of criteria into the CDMP to address uses that must locate outside of the UDB and providing for a reassessment of commercial truck parking needs by 2030.

The analysis provided in this report elucidated four additional issues. First, a review of existing residential uses in the County identified a dearth of attached single family housing that could provide a housing option for moderate income families. Second, an analysis of the various constraints that exist outside of the UDB brought to light the need for continued County governance over these areas. Third, CDMP Policy LU-8G(i)(d) currently defines the Redland area located south of Eureka Drive as an area that shall not be considered for expansion of the UDB but does not define the remaining boundaries. During the July 22, 2020 Board of County

Commissioners hearing that adopted the policy directing this study, Commissioners stressed the importance of further defining the boundaries of the Redland area in Policy LU-8G. The analysis also identified the need to update data related to the acreage needed to maintain an economically viable agricultural industry. Recommendation Nos. 5, 6, 7 and 8 address these issues.

Recommendation No. 1 – Amend CDMP Policy LU-8G(i)(d), which identifies the area south of SW 184th Street as an area that "shall not be considered" for expansion of the UDB, to exclude areas that are generally located within one half mile of the South Dade Transitway. Additionally, any future designation of a UEA in the ±596.5 acres located along the South Dade SMART Plan Corridor ("Analysis Area 3A") should include the concurrent adoption of policies to ensure protection of Natural Forest Communities, appropriate land use transitions to agricultural land, and additional public outreach to ensure that the concerns of the community are addressed.

CDMP Policy LU-8G(i)(d) currently identifies the Redland area, south of SW 184th Street, as an area that shall not be considered for expansion of the UDB. This broad area includes areas located proximate to the South Dade Transitway. In 2016, the Miami-Dade Transportation Planning Organization Governing Board and Board of County Commissioners (Board) endorsed the Strategic Miami Area Rapid Transit (SMART) Plan which identified six planned rapid transit corridors, including the South Dade Transitway. The Board subsequently established the Transportation Infrastructure Improvement District (TIID) which pledges future ad valorem tax revenue increases within one-half mile of the South Dade Transitway to help fund the rapid transit projects and amended the CDMP to provide for transit-oriented development within one-half mile of the South Dade Transitway to support ridership and funding. Based on the analysis provided in this report, it is recommended that CDMP Policy LU-8G(i)(d) be amended to exclude areas that are generally located within one-half mile of the South Dade Transitway. To prevent the creation of split parcels and allow for appropriate transition to agricultural areas, the exclusion should also include areas necessary to provide for logical boundaries that follow the nearest minor or major roadway as depicted on the CDMP Land Use Plan Map.

Given the proximity to high volume transit service, Analysis Area 3A has the ability to support a significant amount of development capacity while also providing for a more logical transition to adjacent agricultural uses. Currently, the UDB abuts urban center areas that permit densities up to 90 dwelling units per acre and, in some areas, up to 125 dwelling units per acre. Conflicts can occur where agricultural activities occur near developed areas, particularly where adjacent to moderate and high-density residential development. Conflicts primarily arise from pesticide spray drift, odor, noise, and farm traffic. Any future designation of a UEA in Analysis Area 3A should include the concurrent adoption of policies to ensure appropriate land use transitions to agricultural land by requiring a gradual tapering down of density where located adjacent to agricultural areas located outside of the designated Urban Expansion Area.

Analysis Area 3A includes designated habitat for the federally-endangered Bartram's Scrub-Hairstreak Butterfly, as depicted on Figure 36. The Bartram's scrub-hairstreak butterflies occur only within pine rocklands, specifically those with pineland croton, the only known hostplant for the butterflies. The Florida Natural Areas Inventory identifies pine rockland as "critically imperiled globally" due to its rarity and high risk of extinction. Historically, these habitats covered

approximately 180,000 acres in South Florida and today have been reduced to about 3,000 acres due to development and agriculture. CDMP Policy LU-3B states, in part, that all significant natural resources and systems shall be protected from incompatible land use including forested portions of Environmentally Sensitive Natural Forest Communities as identified in the Natural Forest Inventory. Any future designation of a UEA in Analysis Area 3A should incorporate concurrent policies providing for delineation and protection of Natural Forest Communities.

Recommendation No. 2 – Any future designation of a UEA in the ±1,398.8 acres located in the North Lake Belt (Analysis Area 1A) should not occur until it can be positively affirmed that the designation would be consistent with Comprehensive Everglades Restoration Plan (CERP) goals. In addition, any future designation of a UEA in this area should include the concurrent adoption of policies to ensure compatibility with nearby rockmining uses and adequate protection of wetland functions.

Analysis Area 1A includes ±634 acres of the North Lake Belt Comprehensive Everglades Restoration Plan (CERP) project which is identified as an area that should be avoided for expansion of the UDB in CDMP Policy LU-8G. The purpose of North Lake Belt project is to capture and store a portion of the stormwater runoff from the C-6, western C-11 and C-9 Basins to maintain water level stages and to provide water deliveries to Biscayne Bay that would help meet salinity targets. The project is envisioned to be an in-ground storage reservoir with a total capacity of approximately 90,000 acre feet that would store water during the wet season. The North Lake Belt project relies on the completion of mining to create the in-ground reservoir, however, mining has not yet commenced within the area. As detailed in this report, independent studies of CERP progress have noted uncertainty about the feasibility of the Lake Belt reservoirs.

In 2020, the US Army Corps of Engineers (COE) began the Project Implementation Report process for the Biscayne Bay and Southeastern Everglades Ecosystem Restoration (BBSEER) project of CERP. The primary focus of the project is on Phase II of the Biscayne Bay Coastal Wetlands project, however, the study will also encompass other CERP components including the North Lake Belt project. The BBSEER effort, which is expected to conclude in the next few years, could provide additional insight into the feasibility of the North Lake Belt project or similar project to capture the anticipated benefits. Given the ongoing effort, it is recommended that a new UEA not be designated in Analysis Area 1A until it can be positively affirmed that the designation would be consistent with CERP goals.

The area includes Wetlands of Regional Significance which generally follow the CERP boundaries. Wetlands of Regional Significance are identified as areas that should be avoided for expansion of the UDB in CDMP Policy LU-8G. The area is part of the western regional system of wetlands, however, wetlands in this area are considered to be highly disturbed and are located outside of the wellfield protection area. Formal wetland delineation will be needed to determine the exact extent and quality of jurisdictional wetlands within the area. There is no designated habitat within the proposed UEA, however the area may still be utilized by federal and state designated species. Any future designation of a UEA in this area should require completion of a threatened and endangered species survey and strongly encourage mitigation of impacted wetlands that are utilized by threatened or endangered species to be achieved within areas that can continue to support those species.

The area is located in the northern portion of the Miami-Dade Lake Belt and includes several active mines. State law requires that amendments to local comprehensive plans located within one mile of the Lake Belt be compatible with limestone mining activities and that Miami-Dade County strongly consider limestone mining activities and ancillary operations when amending local comprehensive plans. Any future designation of a UEA in this area should specifically prohibit residential uses when located in close proximity to active rockmining operations.

Recommendation No. 3 - Establish criteria for urban-type uses that have a unique need to locate outside of the Urban Development Boundary

The need for large expanses of land, to be isolated from residential areas or for access to certain infrastructure may lead to a unique need for a use to locate outside of the Urban Development Boundary (UDB). Currently, the policies of the CDMP do not provide guidance for how these applications should be reviewed or criteria that should be applied. Examples of such uses may include correctional facilities, large-scale solar arrays, wastewater treatment plants, and liquified natural gas facilities. These changes would facilitate the siting of projects of this nature which may not be feasible to locate within the UDB. It would also provide guidelines to ensure that such uses would not hinder the ability of UEAs to support future urban growth.

It is recommended that the policies of the CDMP be amended to provide criteria for determining when a use must locate outside of the UDB and to ensure that the use is developed in a manner that is sensitive to the unique conditions that exist outside of the UDB. The policies should consider the appropriateness of the following criteria:

1) require a demonstration that the use cannot be accommodated within the UDB;
2) provide guidance on where uses should and should not locate,
3) provide a process to determine the appropriateness of extending water and sewer infrastructure to serve the use,
4) establish criteria to ensure that the use accomplishes the following:
    a. minimizes coastal storm risks,
    b. avoids impacts to environmentally sensitive areas,
    c. is adequately buffered to rural residential areas,
    d. is compatible with rockmining activities when located within one mile of the Lake Belt,
    e. minimizes impacts to agricultural land and incorporates agricultural uses where appropriate,
    f. is compatible with airport and military operations,
    g. mitigates potential nuisances including, but not limited to, traffic, noise, fumes and light.

Recommendation No. 4 – Add a policy to the CDMP to reevaluate truck parking demand by 2030 to determine whether the current land supply is sufficient.

A 2010 report conducted by the Miami-Dade Transportation Planning Organization (TPO) documented a severe truck parking shortage in Miami-Dade County, identifying a need for

approximately 1,177 useable acres to accommodate commercial truck parking.[37] In October 2020, the Board adopted amendments to the CDMP that provided for commercial truck parking as an allowable use on ±6,800 acres located outside of the UDB. These areas included ±6,560 acres in Open Land Subarea 1 and ±242 in current Urban Expansion Area No. 3.

It is estimated that there are ±2,091 useable acres within the area where commercial truck parking was permitted.[38] The ability of this land to meet the countywide need for truck parking depends on whether the land is developed for this use. It is recommended that a policy be added to the CDMP directing a reassessment of the land supply needs for commercial truck parking by 2030 including recommendations to address any identified deficiencies.

Recommendation No. 5 – Add a policy to the CDMP to identify opportunities to increase the diversity of housing options inside the Urban Development Boundary with particular focus on increasing the supply of attached single family housing while maintaining the character of established neighborhoods.

As noted in the Background Chapter of this report, the supply of single family residential uses in the County is projected to be depleted by 2024. A review of current residential land uses in the County shows that single family residential (including detached single family and townhomes) comprises approximately 87% of the residential land area. However, due to the land intensive nature of single family housing, it does not contribute significantly to residential capacity.

The gap in depletion years between single family and multi-family housing warrants consideration of how the County can ensure a sufficient mix of housing options, particularly for families. A closer look at the current residential land uses in the County shows that townhome development is underrepresented within the single-family category, comprising only six percent. With its lower land costs, townhome-type development provides an important housing option for moderate income families. The County should aim to strategically increase the diversity of housing options, focusing on the area within the UDB, while maintaining the character of established neighborhoods.

Recommendation No. 6 – Provide for continued County governance over land that is located outside of the Urban Development Boundary.

Land located outside of the UDB serves important functions including filtering and purifying surface and groundwater, providing habitat for wildlife, providing direct recharge of water to the Biscayne Aquifer (the County's primary source of drinking water), and providing natural flood protection. Agricultural areas provide a local economic benefit and contribute to national agricultural production. In addition, limestone mining operations in the County contribute over half of the construction mining material for the State of Florida. These resources are best managed

[37] Miami-Dade Transportation Planning Organization. Comprehensive Parking Study for Freight Transport in Miami-Dade County. 2010.

[38] Estimate of useable acreage excludes public land, water and parcels smaller than 10 acres. It assumes that 30% of the land area will be needed for cut and fill requirements.

under the broader focus of countywide governance. It is recommended that areas located outside of the UDB be identified as areas that cannot be annexed.

This recommendation is consistent with a recommendation from a report commissioned by the Board, pursuant to Resolution No. R-1006-1, to review pending annexation and incorporation proposals and develop a plan to address the remaining unincorporated areas. The 2015 report entitled "Analysis of Incorporation and Annexation within the Unincorporated Areas" prepared by PMG Associates, Inc. recommended that Section 20-3.2 of the Code be amended to prohibit annexations and incorporations outside of the Urban Development Boundary.

Recommendation No. 7 – Define the boundaries of the Redland area for purposes of CDMP Policy LU-8G following consideration of community input.

CDMP Policy LU-8G identifies the Redland area south of Eureka Drive (SW 184th Street) as an area that shall not be considered for expansion of the UDB. The remaining boundaries, most important of which is the southern boundary, are not defined in the policy. Given the lack of a defined southern boundary, the policy could be interpreted to include agricultural land extending to south of Ingraham Highway. It is recommended that these boundaries be clarified within Policy LU-8G following input from the community.

Homesteading and agricultural production in Redland and Silver Palm began in the late 1800s. These areas have collectively come to be known as Redland. As identified on Figure 31 of this report, there is a concentration of historic sites between SW 184th Street and SW 312th Street that reflect this history. In addition, there are several destinations that build on the historical and cultural aspects of the Redland and attract visitors to the area. These destinations are located between SW 184th Street and SW 360th Street and include 'Robert is Here', Schnebly Redland's Winery and Brewery, Knaus Berry Farm, and Fruit and Spice Park. While some of these properties are located inside of the UDB, they serve as a gateway into the Redland area.

A community workshop was held on this issue on October 28, 2020. It is clear from public input that the Redland area is generally viewed to extend across a broad portion of the western agricultural area. As the boundaries in Policy LU-8G are clarified, the policy should also be amended to indicate that the boundaries refer to a portion of the Redland area to avoid the inference that the boundaries have broader applicability. It is also important to note that the agricultural areas located outside of the Redland area are equally important to the agricultural industry of South Dade and include some of the County's larger agricultural properties. CDMP Policy LU-8G identifies land designated Agriculture on the CDMP Land Use Plan Map located outside of a designated Urban Expansion Area as an area that should be avoided for expansion of the UDB.

Recommendation No. 8 – Add a CDMP policy directing completion of a study, in partnership with a research institution, that identifies the amount of land needed to maintain an economically viable agricultural industry and the associated challenges with maintaining the necessary acreage. The study will commence upon identification of a funding source which may include grant funding, if available.

CDMP Policy LU-1R states, in part, that Miami-Dade County shall take steps to reserve the amount of land necessary to maintain an economically viable agricultural industry. Depletion of agricultural land below a certain threshold may lead to a loss of the economies of scale enjoyed by the industry and an associated reduction in agricultural support services such as packing houses and agricultural research. A 2002 study by County Planning staff provided analysis on this issue by projecting future land needs for the County's major agricultural products and the anticipated loss of agricultural land due to urbanization. The analysis showed a need for 51,885 acres for agriculture in 2025. It is important to recognize that the analysis provided in the study is almost twenty years old and the County would benefit from an update. The 2002 study was able to build on data from a larger analysis that was conducted by the University of Florida Institute of Food and Agricultural Sciences (IFAS) with financial support from the Florida Department of Agriculture and Consumer Services. The larger study provided important data on agricultural commodity trends that informed the County's report. It is recommended that funding be identified for an update of the 2002 study to allow for a determination as to the amount of land necessary to maintain an economically viable agricultural industry in Miami-Dade County.

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Appendix 1

Relevant CDMP Policies and CDMP Land Use Plan Map Designations

Policy LU-8F. The Urban Development Boundary (UDB) should contain developable land having capacity to sustain projected countywide residential demand for a period of 10 years. The estimation of this capacity shall include the capacity to develop and redevelop around transit stations at the densities recommended in policy LU-7F. The adequacy of non-residential land supplies shall be determined on the basis of land supplies in subareas of the County appropriate to the type of use, as well as the Countywide supply within the UDB. The adequacy of land supplies for neighborhood- and community-oriented business and office uses shall be determined on the basis of localized subarea geography such as Census Tracts, Minor Statistical Areas (MSAs) and combinations thereof. Tiers, Half-Tiers and combinations thereof shall be considered along with the Countywide supply when evaluating the adequacy of land supplies for regional commercial and industrial activities.

Policy LU-8G. When considering land areas to add to the UDB, after demonstrating that a need exists, in accordance with the foregoing Policy LU-8F:

i) The following areas shall not be considered:

a) The Northwest Wellfield Protection Area located west of the Turnpike Extension between Okeechobee Road and NW 25 Street and the West Wellfield Protection Area west of SW 157 Avenue between SW 8 Street and SW 42 Street;

b) Water Conservation Areas, Everglades National Park, Biscayne National Park, Pennsuco Wetlands, and Bird Drive Wetlands, as depicted on Figure 14;

c) Comprehensive Everglades Restoration Plan project footprints delineated in Tentatively Selected Plans and/or Project Implementation Reports;

d) The Redland area south of Eureka Drive (SW 184 Street);

e) Areas within the accident potential zones of the Homestead Air Reserve Base; and

f) applications for residential land uses within the Coastal High Hazard Areas

ii) The following areas should be avoided:

a) Wetlands of Regional Significance as depicted on Figure 14 of the Land Use Element not otherwise listed in subsection (i)(b) of this policy; and

b) land designated Agriculture on the Land Use Plan map, except where located in designated Urban Expansion Areas (UEAs) and;

c) Comprehensive Everglades Restoration Plan projects identified in the 1999 Final Integrated Feasibility Report and Programmatic Environmental Impact Statement, as may be modified formally or informally by the United States Army Corps of Engineers or the South Florida Water Management District; and

d) land located within the FEMA V Zone.

iii) The following areas shall be given priority for inclusion, subject to conformance with Policy LU-8F and the foregoing provision of this policy:

a) Land within Planning Analysis SubTiers having the earliest projected supply depletion year; and

b) Land within the UEAs and contiguous to the UDB; and

c) Locations within one mile of a planned urban center or transit service station or bus stop providing peak hour headways of 20 minutes or less; and

d) Locations having projected surplus service capacity or where necessary facilities and services can be readily extended.

iv) Notwithstanding Policy LU-8G (iii), other land may be included to expand an existing unique regional facility, defined as an existing public facility or attraction of regional prominence that has been constructed on publicly owned land with significant public funding and intergovernmental coordination, if it satisfies all of the following criteria:

a) The land is within the UEA, is contiguous to the UDB, and is contiguous to a unique regional facility;

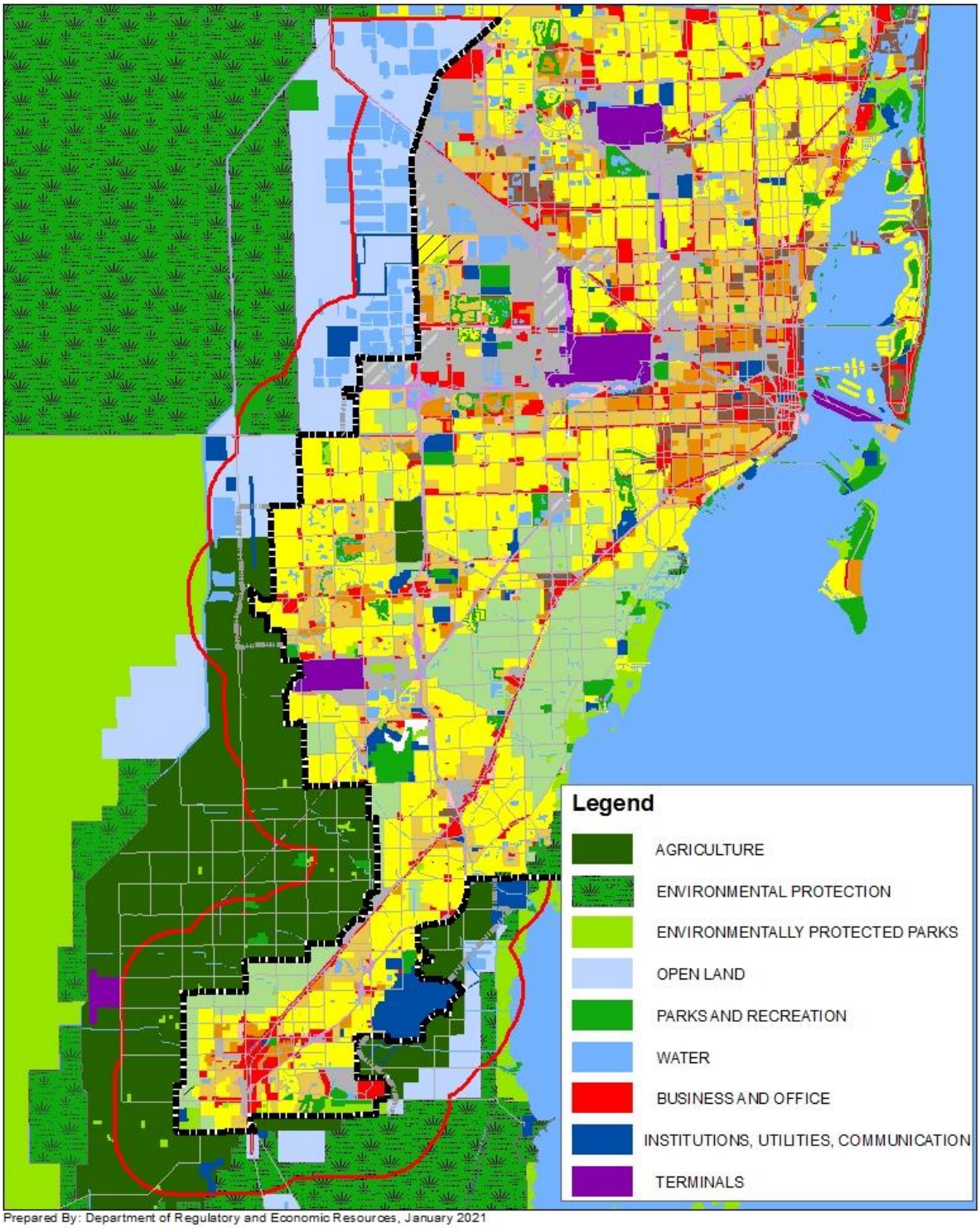
b) The use of the land will be limited to the expansion of the unique regional facility, together with ancillary uses; and

c) The expansion will have a positive economic impact, including increased economic development and tourism.

Policy LU-8H. In addition to conformance with Policies LU-8F and LU-8G, applications requesting expansion of the UDB must request designation as a "Special District" on the CDMP Land Use Plan map and include a text amendment under the "Special District" CDMP text to outline the allowable uses, maximum density, maximum floor area ratio, and how the proposed development will satisfy the criteria set forth in this policy. A zoning application must be filed concurrently with the CDMP Land Use Plan map amendment and should meet the following criteria to be approved:

a) contain a minimum of 10 acres unless the Board of County Commissioners determines a lesser acreage is appropriate; and
b) provide a mix of housing types at a minimum density of 10 du/acre for applications that include residential development; and
c) provide a minimum FAR of 0.25 for applications that include non-residential development, excluding public uses, public utilities, public institutions, and public facilities, except when such non-residential uses are provided to support residential uses located on the same site; and
d) where multiple project phases are proposed, include a phasing schedule that demonstrates that the minimum density and FAR outlined in subsections (b) and (c) will be accomplished in the first phase of development in a recordable instrument in favor of the County; and
e) demonstrate that the project will be served by utility water and sewer service and that adequate public facilities and infrastructure (including water, sewer, roadways, mass transit, solid waste, flood protection, parks and schools) are available or, where not available, ensure the provision of such improvements through a recordable instrument in favor of the County; and
f) provide for the non-residential needs of the future residents including but not limited to shopping, schools, parks, and necessary public uses or demonstrate that such uses are available within an acceptable distance of the subject property; and
g) demonstrate that a jobs to housing ratio of at least 1.5:1 is available within five miles of the subject property or will be provided on-site for future residents; and
h) demonstrate that the proposed development will utilize sound urban design principles contained in the County's Urban Design Manual or other document approved by action of the Board of County Commissioners and will provide for compatibility and connectivity with adjacent urban land uses; and
i) incorporate bicycle and pedestrian accessibility throughout the development with connections to adjacent areas, where appropriate; and
j) provide adequate buffering to adjacent agricultural land; and
k) provide a minimum of 15% of the gross area as open space; and

l) protect environmentally-sensitive areas to the maximum extent feasible including consideration of impacts to threatened and endangered species; and
m) demonstrate that the proposed development will have a positive net fiscal impact to Miami-Dade County; and
n) at least 12.5% of the proposed residential units must be priced affordably for individuals earning up to 140% of the Area Median Income; and
o) include commitments to ensure that the proposed development will be served by mass transit with at least 20 minute peak hour headways or include a plan to provide such service; and
p) include commitments to ensure that the proposed development will not cause a roadway to exceed its adopted level of service standard or further erode the level of service on a failing roadway.
q) provide for the preservation of agricultural land commensurate with the impacts of the application on agriculturally-designated land which may include participation in a Transfer of Development Rights program, Purchase of Development Rights program or other similar effort; however, notwithstanding anything in this paragraph to the contrary, in no event shall properties within the Urban Expansion Area be obligated to preserve agricultural land at a 1-to-1 ratio.



Prepared By: Department of Regulatory and Economic Resources, January 2021

Figure C-2
CDMP Land Use

0 10,000 20,000
SCALE IN FEET

Appendix 2

Land Capacity Methodology Report

Residential Land Supply/Demand Report & Methodology



DEPARTMENT OF REGULATORY AND ECONOMIC RESOURCES

PLANNING RESEARCH AND ECONOMIC ANALYSIS SECTION

NOVEMBER 2019

Residential Land Use and Capacity Designation Methodology

The purpose of the following development capacity analysis is to describe the methodology and ascertain the amount of land available for future residential growth inside the Urban Development Boundary (UDB). This growth includes both new development on green fields and redevelopment. As main references, the approach uses the current zoning and future land use from the Comprehensive Development Master Plan (CDMP) in Miami-Dade County. The analysis seeks to determine the capacity for developing both additional single-family and multi-family type residential dwelling units. This analysis of capacity addresses land in both the municipal and unincorporated areas within the County's current UDB line. Sites are analyzed utilizing a consistent set of criteria that reflects a group of assumptions based on existing and future land development policies including ongoing county and municipal amendments, zoning regulations, approved development orders, covenants and restrictions, development, environmental considerations, ownership patterns and infrastructure requirements.

Two very closely related concepts are addressed in the following discussion and warrant clarification. In the following, when the term "supply" of housing units is used it is a reference to the entire currently existing supply of units in the geographic area. On the other hand, the term "capacity" will be used in the following to refer to the potential for future or additional units. The key issue to be resolved in this analysis is the capacity for additional development in order to accommodate future population growth.

Residential Capacity

Residential capacity is estimated in numbers of units that could be accommodated in aggregate an all parcels or sites according to the various factors enumerated above.

Residential capacity estimates are based on an analysis of the capacity in all areas available for development for additional units including on vacant properties, agricultural parcels within the UDB, potential redevelopment sites and in major approved or proposed projects. This analysis is based on *real time information* (such as real property records and water and sewer agreements), and *administrative regulations* (including zoning covenants and agreements, approved redevelopment projects, administrative site plan approvals, county and municipal development resolutions and ordinances, etc.) available for determining capacity objectively and accurately.

Residential capacity derives from two sources. First is the ability of land without an existing use (except agriculture) to accommodate the development of additional housing units. It is, simply, developable vacant land without severe constraints such as: physical (size, shape, accessibility), legal restrictions (dedicated platted areas like landscape parcels, entrances, lakes, or right of ways and easements, etc.), or environmental constraints (conservation areas, environmentally sensitive parcels, preserves, etc.), and ownership limitations (government owned properties, private institutionally owned properties, community associations), etc. Second is the ability and probability that land with an existing use which, under certain circumstances, will be redeveloped and add to existing capacity.

The county maintains data sets on existing land use and zoning on every parcel inside the urban development boundary (UDB) and mapped with Geographic Information Systems (GIS)

technologies. The estimation of development capacity is ai process that involves the compilation of existing and future uses on a parcel-by-parcel basis across the County. This process involves the updating of current digitized uses on all parcels from high resolution aerial photography that the County acquires almost every year; the continual monitoring of municipal and county legislation amending land use or zoning law; tracking of permitted projects at the municipal and county levels; and an extensive monitoring process that is performed through field work in order identify land use changes.

This monitoring process is, of necessity, highly complex and involves scores of development regulations from municipalities and unincorporated Miami-Dade County. Multiple sources of information are continually consulted during this process, including water and sewer agreements available in GIS data format through the Water and Sewer Department; zoning changes, and administrative development approvals that are collected when published online, for either unincorporated Miami-Dade County or municipalities. In addition, proposed and approved plats available online through Miami-Dade County Public Works Department and plat committee agendas; development plans and proposed projects that are approved through the Board of County Commissioners or from municipal governments usually collected from the municipal web sites and Board of County Commissioners agendas, and Clerk of Court online records, are continually consulted.

The Planning Research Section has implemented a comprehensive local land monitoring process to assess and assign future development capacity. There are eight steps involved in conducting such an assessment:

1. Identify vacant or agricultural land which is available for development according to the development rights that are granted by governing zoning and master plan designations.
2. Identify and subtract vacant or agricultural land proposed and approved for urban public or private institutional services.
3. Identify and subtract vacant or agricultural land with physical or environmental constraints.
4. Identify and limit the development capacity according to approved projects considering restrictive covenants, and administrative development approvals and agreements.
5. Identify land meeting the requirements to be considered for redevelopment.
6. Identify and limit the redevelopment capacity according to the criteria elaborated on below.
7. Identify and further limit the development capacity according to approved projects considering restrictive covenants, and administrative development approvals and agreements.
8. Estimate the residential capacity.

The technical procedures to estimate the capacity are:

1. Vacant or Agricultural Land

- Development capacity assignment is calculated only inside the UDB.

- All land inside the UDB is assigned to a site. Typically, sites are the same as parcels. However, there are instances when properties might be aggregated or split for assignment

to a site. These instances include but are not limited to: common ownership, platted subdivisions, approved development boundaries and site plans, covenants and agreements, and split zoning districts and/or future land use designations.

- The zoning district regulations are the first criteria for determining the capacity on a site. Sometimes future land use map amendments are introduced in order to modify the zoning criteria; if that is the scenario, the new future land use designation prevails over the current zoning district regulations at the time of capacity assignment. For example, future land uses in urban centers and special districts have been revised specifically in order to increase development density in those areas.

- The development information recorded on the real-time-data source (real property file, water and sewer agreements and redevelopment approvals), and other official administrative records like zoning covenants and agreements, administrative site plan approvals, development resolutions, etc.) will prevail over the zoning district regulations and future land use designations for assigning capacity on a site.

- Three exclusions to the capacity of vacant and agricultural sites inside the UDB are addressed. The first is institutional ownership, second are environmental restrictions, and the third is the size, shape and accessibility of the property that doesn't allow for development.

- Sites under a conservation category or officially designated as environmentally sensitive land by any governmental agency; as well as sites that are government-owned or controlled are removed from capacity assignment unless there is an officially approved development plan for the mentioned areas.

- The above analysis is used to determine a total site capacity - how many housing units can be built on vacant and agricultural sites across the county. This total capacity of vacant or agricultural sites is reduced by 20 percent to account for build-out limitations such as roads or utility easements. In addition, there is a 3 percent reduction in capacity to account for the existence of very small vacant parcels that prevail even in a mature built-out area.

2. Redevelopment Capacity

The last step in estimating supply is the estimate of residential units resulting from the redevelopment of existing units. The procedure to estimate redevelopment capacity was restricted to developed sites with any land use designation that allows residential as a permitted use or those zoned a category that allows residential uses, whether or not residential currently exists on the site. In addition, single-family-type parcels and condominiums were excluded as were sites with a designation as historic or in a district with a historic designation. To qualify as a candidate for redevelopment a site had to satisfy the following requirements: (i) located inside the UDB (Previously the redevelopment analysis was limited to parcels inside the Urban Infill Area); (ii) the structure had to be built before 1980 (versus 1970 in the previous analysis); (iii) the building-to-land-value ratio had to be 0.75 or lower. The qualified sites were reviewed by staff and each was

assigned a probability factor. The factor was based on the potential number of net additional units for all qualifying sites (i. ii and iii) by deducting the number of existing units from the total potential units that could be developed. Sites with a net unit gain of less than seven units was assigned a redevelopment probability factor of 0.33 to be redeveloped. The sites with a net gain of seven to 14 units was assigned a redevelopment probability factor of 0.66, and those with a net gain of 15 or more units, a factor of 0.99. The factors were then applied to each respective site's net potential additional units to derive the final countywide estimate of capacity from redevelopment which is 83,142 units.

One final category of redevelopment capacity does not go through the above analysis - major projects on the redevelopment list. Major projects included on the redevelopment list are existing large-scale proposed projects, projects approved by county or municipal commissions, and projects already under construction. Unlike residential redevelopment capacity that is adjusted with a probability factor, these major projects are counted at 100 percent of their proposed, approved or under-construction capacity. Previously, such projects were only counted at 50 percent until commencement of construction.

Update and Analysis of Baseline Data Population. Miami-Dade is Florida's most populous county, a position it has held for several decades. In 2018, Miami-Dade County ranked 7th in population among all metropolitan areas in the United States, up from 8th in 2010 and 12th in 2000. Miami-Dade grew by an average of more than 30,000 people annually every decade between 1950 and 2000. Adding 439,000 residents in the 1950's, 332,000 in the 1960's, 357,000 in the 1970's, 311,000 in the 1980's, and 316,000 in the 1990's. In the decade from 2000 to 2010 the 30,000 annual average growth floor was breached for the first time since the 1940's, with an addition of 243,000 residents.

Until the 2020 Census release more than one year from now, a definite outlook of the 2010's is not possible, but by looking at proxies of population growth, it is widely expected that the growth in the second decade of the current century will surpass the growth of the first.

Population Projections. The Department of Regulatory and Economic Resources periodically revises its population estimates and projections countywide and by subarea. The population projections are a fundamental growth management component of the CDMP used both for land use planning and to coordinate the planning of public facilities and services with the LUP map. The basis for revisions in the projected subarea population typically includes: modification of the countywide population projections; updated housing counts; changes in development capacity of the CDMP LUP that result from cumulative changes to zoning and/or LUP map of the CDMP; and, identified redevelopment trends.

In 2013 a major revision of the countywide population projections was completed, mainly due to the release of the 2010 census. It found a lower population growth between 2000 and 2010 than had been expected, 243,000 new residents as opposed to 310,000. After several years of new inter-census data releases, in 2018 a follow-up revision was completed with an estimated population for 2016 and projected figures out to 2040.

These countywide projections were developed in the same manner as previous series, by using the component method for population projections. The component method uses data on births, deaths, and migration flows, domestic and international. The components of population change

are estimated separately and then combined for total population change. For all components, a linear regression was run using data from 1990 to 2016 to project out to 2040. Historical data was analyzed to spot possible outliers, which could skew the results, for consideration of removal from the projection calculations. Finally, each component's raw projected values were assessed in terms of the need of adjustments in order to make initial projected values consistent with the final historical data points.

Looking forward, the total resident population of the county is expected to rise to 3,086,543 in 2030 and 3,367,040 by 2040. Births are expected to decline from 33,537 in 2018 to 31,120 in 2030 and 27,781 in 2040. Deaths are projected to remain in the 19,000 range up to 2032 and, following its historical downward trend, slide to 18,010 in 2040. Domestic out-migration flows are projected to increase steadily but at a lower rate than in the past. Increasing steadily to 104,009 a year in 2040 from 83,164 in 2016, while in-migration increases at a somewhat faster rate from 60,534 in 2016 to 83,690 in 2040. In net, domestic migration moves from an average of -19,986 in the 2010 – 2016 period to -20,345 in the 2035 – 2040 period. This continued steady drain on the county's population is projected to be offset by immigration, which is projected to remain positive, averaging just over 37,700 in the 2035-2040 period slightly up from an average of 35,568 in the 2011-2016 period. Population projections for Miami-Dade County are shown in Table 1.1-2 below.

Table 1.1-2
Population Projections
Components of Change
Miami-Dade County, Florida: 2000 to 2040

Year Ending March 31	Resident Population	Population Change	Net Migration	Natural Increase (Birth-Death)	Resident Births	Resident Deaths	Net Immigration	Domestic Migration
2010	2,496,436	36,087	21,862	14,225	32,090	17,865	30,364	-8,502
2011	2,549,780	53,344	40,017	13,327	31,339	18,012	35,791	4,226
2012	2,563,954	14,174	1,181	12,993	31,132	18,139	34,358	-33,177
2013	2,568,281	4,327	-7,787	12,114	30,642	18,528	34,605	-42,392
2014	2,594,280	25,999	13,183	12,816	31,358	18,542	36,751	-23,568
2015	2,629,878	35,598	22,480	13,118	32,101	18,983	36,336	-13,856
2016	2,674,279	44,401	31,488	12,913	32,493	19,580	54,118	-22,630
2017	2,702,695	28,416	16,411	12,005	32,331	20,326	36,969	-20,558
2018	2,732,727	30,032	16,458	13,574	33,537	19,963	37,006	-20,548
2019	2,762,698	29,971	16,506	13,465	33,402	19,937	37,043	-20,537
2020	2,792,599	29,901	16,553	13,348	33,254	19,906	37,080	-20,527
2021	2,822,427	29,828	16,601	13,227	33,095	19,868	37,117	-20,516
2022	2,852,175	29,748	16,648	13,100	32,924	19,824	37,154	-20,506
2023	2,881,836	29,661	16,696	12,965	32,740	19,775	37,192	-20,496
2024	2,911,406	29,570	16,744	12,826	32,545	19,719	37,229	-20,485
2025	2,940,877	29,471	16,791	12,680	32,338	19,658	37,266	-20,475
2026	2,970,244	29,367	16,839	12,528	32,118	19,590	37,303	-20,464
2027	2,999,500	29,256	16,886	12,370	31,887	19,517	37,340	-20,454
2028	3,028,639	29,139	16,933	12,206	31,643	19,437	37,377	-20,444
2029	3,057,655	29,016	16,981	12,035	31,387	19,352	37,414	-20,433
2030	3,086,543	28,888	17,028	11,860	31,120	19,260	37,451	-20,423
2031	3,115,297	28,754	17,076	11,678	30,840	19,162	37,488	-20,412
2032	3,143,911	28,614	17,124	11,490	30,548	19,058	37,526	-20,402
2033	3,172,378	28,467	17,171	11,296	30,244	18,948	37,563	-20,392
2034	3,200,692	28,314	17,219	11,095	29,928	18,833	37,600	-20,381
2035	3,228,847	28,155	17,266	10,889	29,600	18,711	37,637	-20,371
2036	3,256,838	27,991	17,314	10,677	29,260	18,583	37,674	-20,360
2037	3,284,658	27,820	17,361	10,459	28,908	18,449	37,711	-20,350
2038	3,312,302	27,644	17,408	10,236	28,544	18,308	37,748	-20,340
2039	3,339,765	27,463	17,456	10,007	28,169	18,162	37,785	-20,329
2040	3,367,040	27,275	17,504	9,771	27,781	18,010	37,823	-20,319
Decade				**Ten-Year Annual Change, 1991 to 2040**				
1991-2000		31,639	17,732	13,907	32,458	18,551	38,986	-21,253
2001-2010		24,295	9,685	14,610	32,818	18,208	33,569	-23,884
2011-2020		29,616	16,649	12,967	32,159	19,192	38,006	-21,357
2021-2030		29,394	16,815	12,580	32,180	19,600	37,284	-20,470
2031-2040		28,050	17,290	10,760	29,382	18,622	37,656	-20,366

Source: U.S. Bureau of the Census, Decennial Census 2010. Post-2010 figures, Miami-Dade County, Department of Regulatory and Economic Resources, Research Section, 2018.

Population Distribution. For most planning purposes, the geographic distribution and change in population are analyzed using 32 areas of the County called Minor Statistical Areas (MSAs). Minor Statistical Areas are based on census tracts, which are a component of the United States Census geography and may contain one large census tract or an aggregation of census tracts. The

Department of Planning and Zoning established MSAs as planning areas to standardize areas within the County for the development of statistical data and projections.

The relative population distribution projected for 2040 shows that the western part of the County, particularly MSAs 3.1, 3.2, 6.1, and 6.2, that has been the main area of relative growth for the county since the 1970s, peaked as a share of the county's population in 2015 at 28.5 percent, and will have a growth in population more in line with the countywide growth going forward. Receding to 27 percent in 2030 and 26.4 percent in 2040 (see Population Estimates and Projections map below).

The central core comprised of Downtown Miami (MSA 4.7) and the Brickell area (MSA 5.2) that had accounted for 7 percent of the county's population in 1970 and subsequently declined to 4 percent by 2000 is projected to increase to 7 percent again by 2030 and reach 7.4 percent in 2040.

In South Miami-Dade, the current population projections show approximately 10.7 percent of the total County population living south of Eureka Drive (SW 184 Street) in 2020; up from 10.2 percent in 2010 and 8.0 percent in 2000. Going forward the area is projected to account for 12.0 percent of the county's population in 2030 and 12.5 percent in 2040The distribution of projected population growth out to the year 2040 is presented in Tables 1.1-3 and 1.1-4 and Figure 1.1-7 below.

Table 1.1-3

Proposed Population Projections, 2000 to 2040

Miami-Dade County by Minor Statistical Area

Area	2000	2010	2015	2020	2025	2030	2035	2040	Capacity
1.1	16,278	21,751	22,997	29,470	30,527	32,325	33,470	33,470	30,427
1.2	10,513	12,389	12,608	12,698	12,737	13,064	13,430	13,786	12,683
1.3	108,526	108,960	113,948	127,485	131,536	137,042	142,651	148,051	130,264
2.1	160,589	172,876	179,219	193,994	199,993	208,675	217,740	226,631	202,042
2.2	48,988	54,587	57,140	59,546	60,476	62,595	64,893	67,151	62,277
2.3	82,976	83,312	85,115	85,715	89,613	92,767	95,704	98,520	87,635
2.4	78,931	80,165	81,747	82,785	87,779	91,829	95,577	99,134	87,489
3.1	201,811	225,910	234,666	244,014	246,784	254,612	263,159	271,501	250,662
3.2	122,540	147,957	163,852	180,709	183,772	191,458	200,380	209,798	199,736
4.1	87,834	85,289	90,551	93,212	99,590	104,815	109,649	114,215	100,336
4.2	80,689	78,441	81,563	83,904	93,096	99,915	106,024	111,714	97,259
4.3	115,905	116,176	119,583	120,813	124,454	127,821	131,090	134,285	119,897
4.4	16,060	16,182	16,512	16,648	17,265	17,792	18,292	18,776	16,741
4.5	122	7	7	440	899	1,096	1,226	1,330	1,505
4.6	47,631	48,378	51,624	53,857	58,810	62,867	66,663	70,298	62,810
4.7	35,945	49,654	56,328	91,027	111,843	123,629	133,329	142,473	150,863
5.1	122,903	132,529	138,805	141,931	148,620	155,938	163,158	170,075	149,640
5.2	55,896	70,629	77,402	87,947	89,482	93,272	97,704	102,432	99,218
5.3	120,126	127,979	134,314	141,619	147,634	154,740	161,899	168,842	149,742
5.4	102,262	102,113	103,494	103,853	107,517	110,363	113,003	115,559	103,561
5.5	80,111	79,926	82,877	87,585	91,144	94,752	98,269	101,641	89,576
5.6	32,431	32,014	32,795	33,695	35,728	37,331	38,806	40,204	35,541
5.7	25,346	25,078	25,828	26,432	27,769	28,868	29,893	30,872	27,362
5.8	35,040	35,697	36,310	37,310	40,178	42,501	44,640	46,653	40,856
6.1	156,640	186,579	193,240	195,077	197,591	204,567	212,343	220,114	197,188
6.2	125,812	146,136	158,245	162,626	165,646	172,301	179,725	187,274	170,812
7.1	41,575	62,081	67,563	69,888	73,036	76,909	81,065	85,413	84,387
7.2	39,327	47,187	49,985	51,821	64,468	71,815	77,906	83,582	81,019
7.3	32,367	37,836	39,756	40,230	45,098	48,703	52,017	55,228	51,507
7.4	48,364	73,780	86,086	99,251	110,513	118,798	126,544	134,303	138,186
7.5	14,635	28,259	28,496	29,647	39,349	44,434	48,404	52,018	56,534
7.6	5,189	6,578	7,222	7,370	7,930	8,949	10,194	11,697	28,700
Total	2,253,362	2,496,435	2,629,878	2,792,599	2,940,877	3,086,543	3,228,847	3,367,040	3,116,455

Note: Capacity includes capacity outside the Urban Development Boundary.

The decrease in population from 2000 to 2010 in MSA 4.5 was due to the realignment of the boundary of Census Tract 98.05.

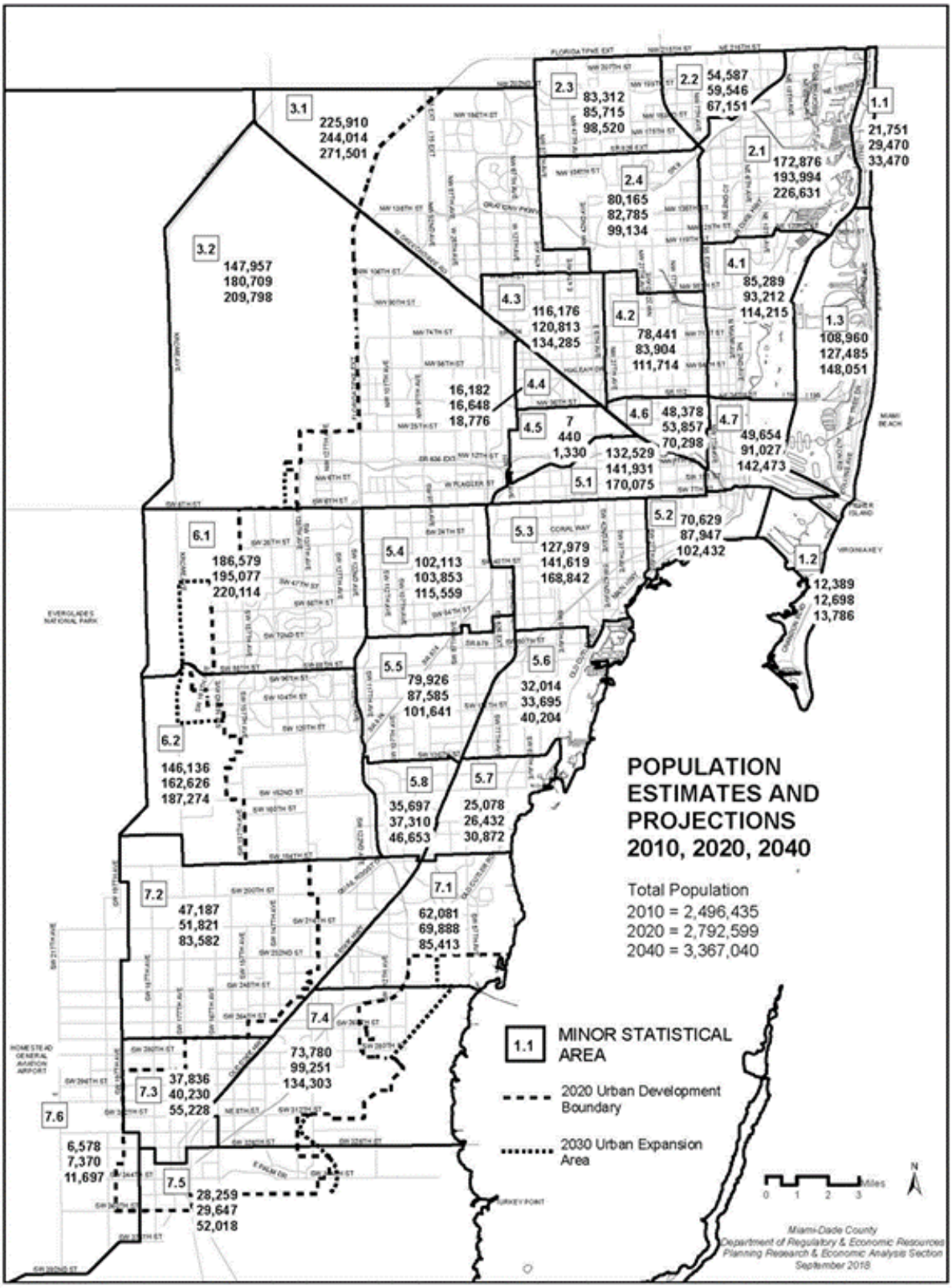
Source: Miami-Dade County, Department of Regulatory and Economic Resources, Research Section 2019.

Table 1.1-4
Annual Average Change
Population Projections 1970-2040
Miami-Dade County by Minor Statistical Area

Area	2000-2010	2010-2020	2020-2030	2030-2040
1.1	547	772	286	115
1.2	188	31	37	72
1.3	43	1,853	956	1,101
2.1	1,229	2,112	1,468	1,796
2.2	560	496	305	456
2.3	34	240	705	575
2.4	123	262	904	731
3.1	2,410	1,810	1,060	1,689
3.2	2,542	3,275	1,075	1,834
4.1	-255	792	1,160	940
4.2	-225	546	1,601	1,180
4.3	27	464	701	646
4.4	12	47	114	98
4.5	-12	43	66	23
4.6	75	548	901	743
4.7	1,371	4,137	3,260	1,884
5.1	963	940	1,401	1,414
5.2	1,473	1,732	533	916
5.3	785	1,364	1,312	1,410
5.4	-15	174	651	520
5.5	-19	766	717	689
5.6	-42	168	364	287
5.7	-27	135	244	200
5.8	66	161	519	415
6.1	2,994	850	949	1,555
6.2	2,032	1,649	968	1,497
7.1	2,051	781	702	850
7.2	786	463	1,999	1,177
7.3	547	239	847	653
7.4	2,542	2,547	1,955	1,551
7.5	1,362	139	1,479	758
7.6	139	79	158	275
Total	24,307	29,616	29,394	27,639

Source: Miami-Dade County, Department of Regulatory and Economic Resources, Research Section 2019.

Figure 1.1-7


3.1
225,910
244,014
271,501
3.2
147,957
180,709
209,798
2.3
83,312
85,715
98,520
2.2
54,587
59,546
67,151
1.1
21,751
29,470
33,470
2.1
172,876
193,994
226,631
2.4
80,165
82,785
99,134
4.1
85,289
93,212
114,215
1.3
108,960
127,485
148,051
4.3
116,176
120,813
134,285
4.2
78,441
83,904
111,714
4.4
16,182
16,648
18,776
4.5
7
440
1,330
4.6
48,378
53,857
70,298
4.7
49,654
91,027
142,473
5.1
132,529
141,931
170,075
5.2
70,629
87,947
102,432
1.2
12,389
12,698
13,786
6.1
186,579
195,077
220,114
5.4
102,113
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127,979
141,619
168,842
5.5
79,926
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101,641
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40,204
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162,626
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37,310
46,653
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99,251
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7.3
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55,228
7.6
6,578
7,370
11,697
7.5
28,259
29,647
52,018
POPULATION ESTIMATES AND PROJECTIONS 2010, 2020, 2040
Total Population
2010 = 2,496,435
2020 = 2,792,599
2040 = 3,367,040
1.1 MINOR STATISTICAL AREA
2020 Urban Development Boundary
2030 Urban Expansion Area
Miles
0 1 2 3
N
Miami-Dade County
Department of Regulatory & Economic Resources
Planning Research & Economic Analysis Section
September 2018

Seasonal/Transient Population. Miami-Dade County has been a major destination for tourists and winter visitors since the 1920s. Although, as a share of the resident population, seasonal and overnight visitors has decreased, its size is still substantial and must be accounted for in all types of planning. This group, just as permanent residents, places demands on urban services and facilities. They constitute a "peak load" factor for water and sewer facilities, solid waste collection and disposal, health care, recreational facilities and many other services and facilities. This population includes all nonresidents of Miami-Dade who spend at least one night in the County. Non-residents are distinguished from residents based on their usual home, i.e. the place where they live most of the time (more than six months is the Census criterion).

The measure used in analyzing transient population in Miami-Dade County was the average daily population in the peak month. The basic approach was to estimate the peak seasonal population based on the fluctuations in sales tax data. The annual change was added to a low season tourism base established via hotel/motel occupancy rates. Table 1.1-5 shows the average daily overnight visitors by month for Miami-Dade County, Florida, for 2017 and 2018. As can be seen in the table below the peak month for 2017 was March, while the peak month for 2018 was December when, on average, 218,345 overnight visitors were staying in Miami-Dade County. These visitors were then classified by type. The geographic distribution of this population within Miami-Dade County was also estimated.

Table 1.1-5
Average Daily Overnight Visitors
Monthly
Miami-Dade County 2017 - 2018

Month	2017	2018
January	191,088	174,228
February	204,285	192,875
March	**217,288**	209,924
April	189,941	182,474
May	161,660	163,119
June	154,423	157,506
July	170,556	159,183
August	140,922	160,908
September	110,151	155,235
October	152,108	162,687
November	169,997	172,638
December	217,280	**218,345**
Average	173,308	175,760

Source: Miami-Dade County, Department of Regulatory and Economic Resources. Research and Economic Analysis Section 2019.

Table 1.1-6 presents the distribution of visitors by category in Miami-Dade County by MSA. Just over 40 percent of all visitors stayed in MSAs 1.1, 1.3, and 2.1, the coastal locations. The second largest concentration (about 13 percent) stayed in the downtown Miami - Brickell – Coconut Grove area, that are within MSAs 4.7 and 5.2. The areas adjacent to the airport, MSAs 3.2 and 5.1 accounted for almost 11 percent of visitors with the rest distributed in all other areas of the County.

Table 1.1-6

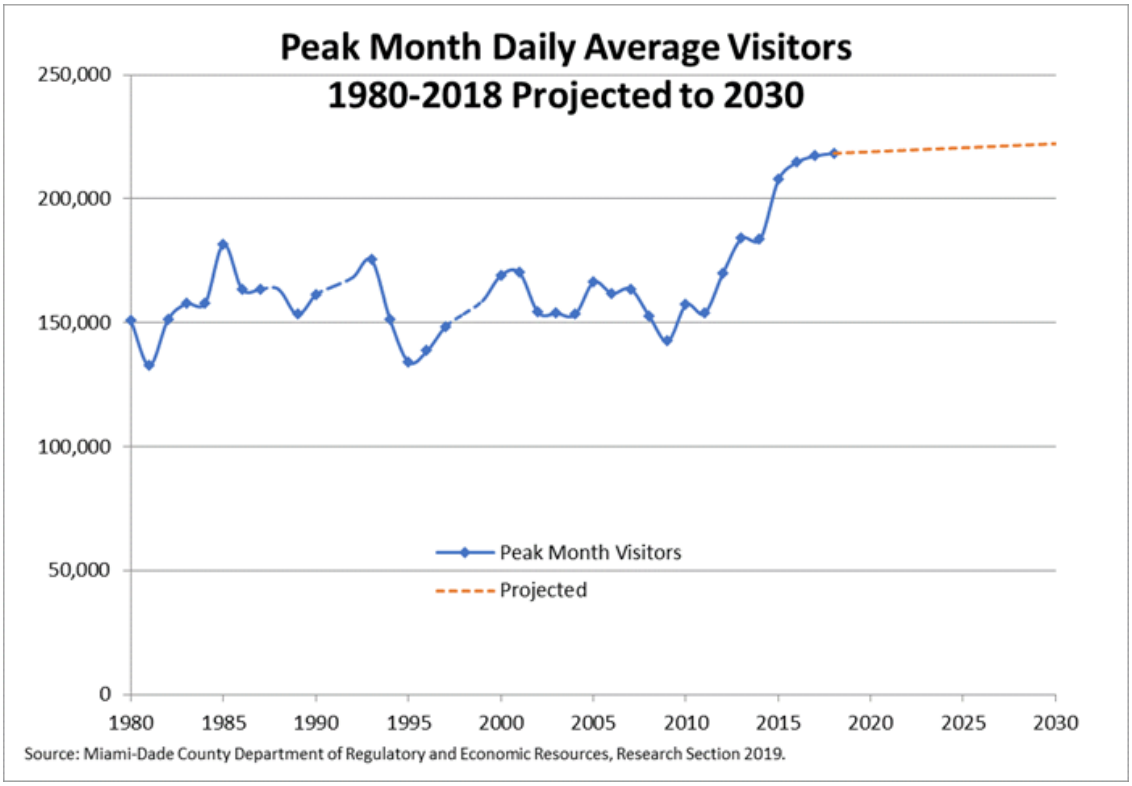
Peak Month Distribution of Transient Population
by Type of Accommodation
Miami-Dade County 2018 by Minor Statistical Area

Area	Total Visitors	Hotels, Motels, & Rooming Houses	Short Term Peer to Peer Rental	With Family & Friends	Trailer Park, Marinas & Campgrounds	Nonresident Households
1.1	12472	2614	1019	578	23	8238
1.2	3289	646	59	251	521	1812
1.3	59352	35339	3972	2959	250	16832
2.1	18234	2136	1046	3388	828	10836
2.2	1499	0	120	995	0	384
2.3	1821	347	80	1227	0	167
2.4	1636	49	127	1345	0	115
3.1	6047	1703	209	3826	81	228
3.2	15695	10384	361	2632	56	2262
4.1	5221	1074	1530	1726	181	710
4.2	1947	112	162	1370	28	275
4.3	3628	1313	25	2042	33	215
4.4	3431	2913	115	313	0	90
4.5	6101	6101	0	0	0	0
4.6	1772	314	174	946	97	241
4.7	14201	8177	1550	1308	114	3052
5.1	8030	3976	852	2825	0	377
5.2	14859	5759	1763	1718	117	5502
5.3	8721	3805	1125	2596	8	1187
5.4	2326	208	206	1629	0	283
5.5	3922	1625	308	1619	0	370
5.6	1009	0	78	616	176	139
5.7	756	158	54	428	14	102
5.8	646	0	54	585	0	7
6.1	3966	189	316	3088	0	373
6.2	3861	678	342	2425	0	416
7.1	1846	443	107	1099	183	14
7.2	2423	8	76	787	1504	48
7.3	1817	478	54	561	649	75
7.4	3225	1310	154	1286	428	47
7.5	3579	1586	17	449	1330	197
7.6	1013	0	0	101	879	33
Totals	**218,345**	**93,445**	**16,055**	**46,718**	**7,500**	**54,627**
	100.0%	42.8%	7.4%	21.4%	3.4%	25.0%

Source: Research Section, Miami-Dade, Regulatory and Economic Resources Department, Research Section 2019

For at least thirty years, between 1980 and 2010, the peak month daily average visitors remained within a defined range, around a 155 thousand average, and showed no clear trend either upward or downward. Over this period, the difference between the peak month and the rest of the months compressed, and in doing so, total yearly visitors to the area has generally increased. With the vantagepoint of several years gone by, it is now clear that after a low in 2009 during the great recession, the peak month daily average visitors started on an upward trend, breaking the thirty-

year average and by 2015 surpassing the 200,000 mark. Over the last9 years, the increase has been sharp and then moderated towards the very last three years, giving an indication that the value will settle at around 220,000 for the foreseeable future.



Projected Residential Land Supply and Demand

Supply and demand analysis is done to determine the adequacy of the existing capacity to accommodate projected growth.

Residential supply is based on the amount of developable vacant and agricultural land inside the UDB, and redevelopment capacity. Residential demand is assessed in terms of housing units that will be needed to accommodate projected population growth of the county over the planning horizon. Future population figures for the county are developed by using the component method as described in a sperate document. The projected population is allocated to the county's 32 Minor Statistical Areas (MSAs) by extrapolating from historic trends and capacity. The population figures are converted into housing units by applying the persons per household ratio to determine residential demand. In order to adjust for the demand for second homes, a procedure to estimate the number of units used by non-residents for seasonal purposes was added. (The percent of units used for this purpose, by MSA, was derived from the 2010 Census.

Before reviewing the new figures, it is worth noting a caution that has invariably accompanied population and housing projections for Miami-Dade County. The numbers that are projections, not predictions, of future conditions. They are an indication of what will happen if the current assumptions hold true. These assumptions are based on a thorough review of current trends and conditions in Miami-Dade County. However, experience has shown that the Miami-Dade County

housing market, like its population growth, is quite variable. The future will be different from the projections. This was especially relevant during the recent period of high foreclosures and exceedingly high vacancy rates.

Table 1.1 shows that the projected demand for single-family and multi-family housing countywide and compares this with the existing residential land supply within the year 2019 UDB. Currently, enough capacity exists within the UDB to accommodate projected demand beyond the year 2040. The single-family supply is projected to be exhausted by 2024; the multi-family beyond 2040.

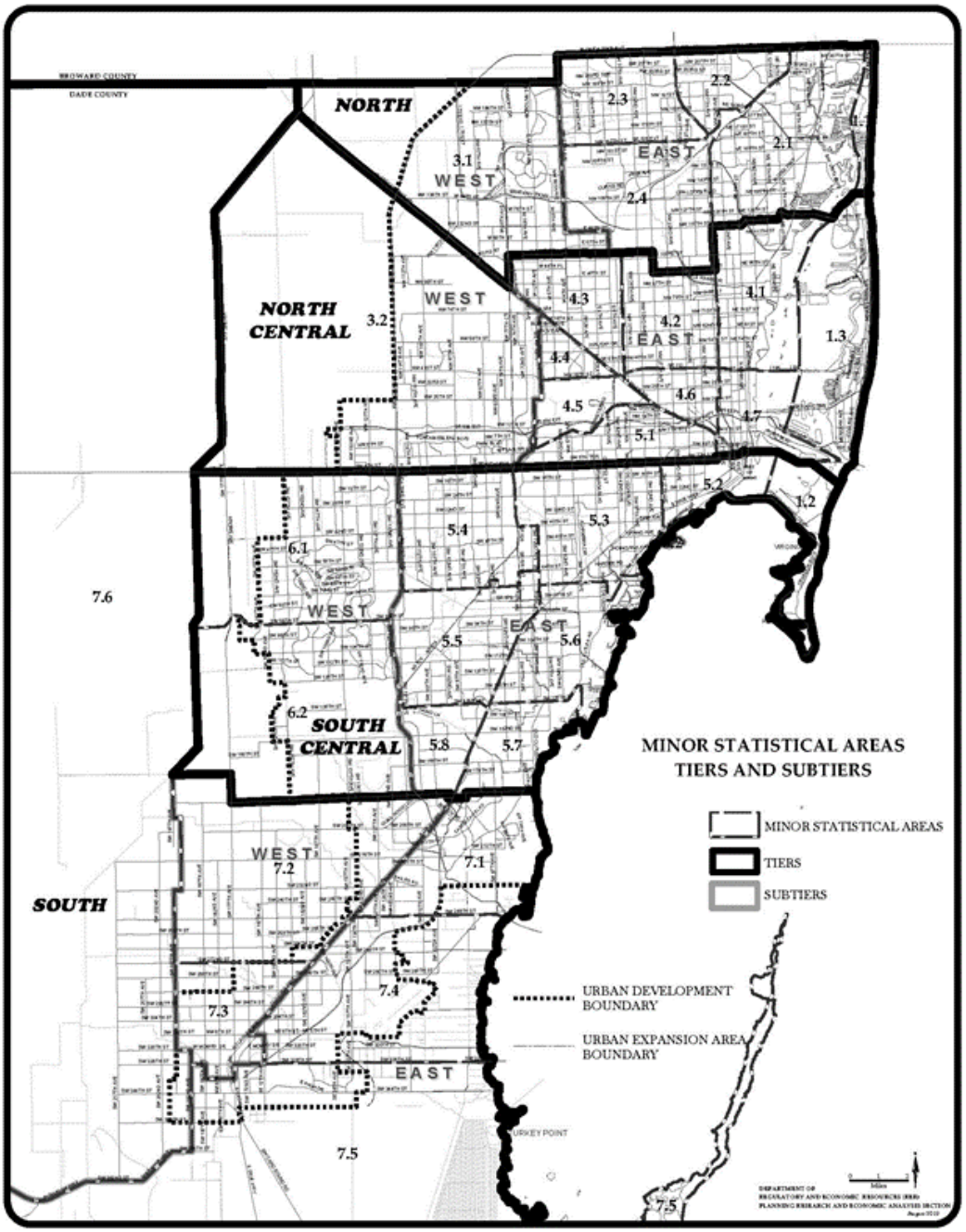
Table 1.1
Residential Land Supply/Demand Analysis
Miami-Dade County, 2019 to 2040

Analysis Done Separately for Each Type, i.e. No Shifting of Demand between Single & Multifamily Type	Structure Type		
	Single Family	Multi-Family	Both Types
Capacity in 2019	28,581	233,655	262,236
Annual Demand in 2015-2020	4,728	8,391	13,119
Capacity in 2020	23,853	225,264	249,117
Annual Demand in 2020-2025	5,478	5,263	10,741
Capacity in 2025	0	198,949	195,412
Annual Demand in 2025-2030	5,482	5,007	10,489
Capacity in 2030	0	173,914	142,967
Annual Demand in 2030-2035	5,405	4,806	10,211
Capacity in 2035	0	149,884	91,912
Annual Demand in 2035-2040	5,292	4,587	9,879
Capacity in 2040	0	126,949	42,517
Depletion Year	2024	2040+	2040+

Source: Miami-Dade County, Department of Regulatory and Economic Resources, Research and Economic Analysis Section, November 2019.

Tables 1.1-8 through 1.1-11 show similar data for the four tiers used for the residential supply/demand analysis. These tiers are further broken down by sub tier into eastern and western halves.

Figure 1.1-8



The North Tier has enough capacity to accommodate projected demand through the year 2034. The single-family supply is projected to be exhausted by 2025, whereas the multi-family supply is depleted after 2040. The projected demand for housing is lower in the western half. The capacity there is projected to be depleted by 2031. In the eastern half the projected depletion year is 2036.

Table 1.1-8
Residential Land Supply/Demand Analysis
North Miami-Dade Tier, 2019 to 2040

Analysis Done Separately for Each Type, i.e. No Shifting of Demand between Single & Multifamily Type	Subtier: Eastern Part Single Family	Eastern Part Multi-Family	Eastern Part Both Types	Western Part - MSA 3.1 Single Family	Western Part - MSA 3.1 Multi-Family	Western Part - MSA 3.1 Both Types	North Miami-Dade Total Single Family	North Miami-Dade Total Multi-Family	North Miami-Dade Total Both Types
Capacity in 2019	2,945	20,173	23,118	2,205	2,603	4,808	5,150	22,776	27,926
Annual Demand in 2015-2020	641	1,358	1,999	328	267	595	969	1,625	2,594
Capacity in 2020	2,304	18,815	21,119	1,877	2,336	4,213	4,181	21,151	25,332
Annual Demand in 2020-2025	609	541	1,150	97	79	176	706	620	1,326
Capacity in 2025	0	16,110	15,369	1,392	1,941	3,333	651	18,051	18,702
Annual Demand in 2025-2030	657	748	1,405	274	224	498	931	972	1,903
Capacity in 2030	0	12,370	8,344	22	821	843	0	13,191	9,187
Annual Demand in 2030-2035	645	707	1,352	300	244	544	945	951	1,896
Capacity in 2035	0	8,835	1,584	0	0	0	0	8,436	0
Annual Demand in 2035-2040	613	595	1,208	293	238	531	906	833	1,739
Capacity in 2040	0	5,860	0	0	0	0	0	4,271	0
Depletion Year	2023	2040+	2036	2030	2033	2031	2025	2040+	2034

Source: Miami-Dade County, Department of Regulatory and Economic Resources, Research and Economic Analysis Section, 2019.

The more established and heavily developed North Central Tier has enough capacity to accommodate project demand beyond the year 2040. The single-family supply is projected to be exhausted by 2021, whereas the multi-family supply will be depleted after 2040. The projected demand for housing is higher in the eastern half and land is projected to be exhausted beyond the year 2040. In the western half the projected depletion year is 2036.

Table 1.1-9
Residential Land Supply/Demand Analysis
North Central Tier, 2019 to 2040

Analysis Done Separately for Each Type, i.e. No Shifting of Demand between Single & Multifamily Type	Subtier: Eastern Part Single Family	Eastern Part Multi-Family	Eastern Part Both Types	Western Part - MSA 3.2 Single Family	Western Part - MSA 3.2 Multi-Family	Western Part - MSA 3.2 Both Types	North Central Total Single Family	North Central Total Multi-Family	North Central Total Both Types
Capacity in 2019	2,890	140,054	142,944	1,198	7,712	8,910	4,088	147,766	151,854
Annual Demand in 2015-2020	952	4,776	5,728	560	579	1,139	1,522	5,355	6,867
Capacity in 2020	1,938	135,298	137,216	638	7,133	7,771	2,576	142,411	144,987
Annual Demand in 2020-2025	1,400	3,308	4,708	102	105	207	1,502	3,413	4,915
Capacity in 2025	0	118,738	113,676	128	6,608	6,736	0	125,346	120,412
Annual Demand in 2025-2030	1,176	2,501	3,677	255	264	519	1,431	2,765	4,196
Capacity in 2030	0	106,233	95,291	0	5,288	4,141	0	111,521	99,432
Annual Demand in 2030-2035	1,098	2,272	3,370	296	306	602	1,394	2,578	3,972
Capacity in 2035	0	94,873	78,441	0	3,758	1,131	0	98,631	79,572
Annual Demand in 2035-2040	1,045	2,162	3,207	313	323	636	1,358	2,485	3,843
Capacity in 2040	0	84,063	62,406	0	2,143	0	0	86,206	60,357
Depletion Year	2021	2040+	2040+	2025	2040+	2036	2021	2040+	2040+

Source: Miami-Dade County, Department of Regulatory and Economic Resources, Research and Economic Analysis Section, 2019.

The South-Central Tier has enough capacity to accommodate projected demand through the year 2036. The single-family supply is projected to be exhausted by 2021, whereas the multi-family supply is depleted after 2040. The projected demand for housing is higher in the eastern part and the capacity there is higher. This capacity is projected to be depleted after 2040. In the western

half, the projected depletion year is by the year 2025. Here the single-family depletion year is 2021.

Table 1.1-10
Residential Land Supply/Demand Analysis
South Central Tier, 2019 to 2040

Analysis Done Separately for Each Type, i.e. No Shifting of Demand between Single & Multifamily Type	Subtier								
	East of Turnpike			West of Turnpike			South Central Total		
	Single Family	Multi-Family	Both Types	Single Family	Multi-Family	Both Types	Single Family	Multi-Family	Both Types
Capacity in 2019	2,091	37,834	39,925	810	1,955	2,765	2,901	39,789	42,690
Annual Demand in 2015-2020	1,088	1,039	2,127	317	72	389	1,405	1,111	2,516
Capacity in 2020	1,003	36,795	37,798	493	1,883	2,376	1,496	38,678	40,174
Annual Demand in 2020-2025	1,078	483	1,561	278	67	345	1,356	550	1,906
Capacity in 2025	0	34,380	29,993	0	1,548	651	0	35,928	30,644
Annual Demand in 2025-2030	1,103	643	1,746	682	168	850	1,785	811	2,596
Capacity in 2030	0	31,165	21,263	0	708	0	0	31,873	17,664
Annual Demand in 2030-2035	1,089	678	1,767	761	187	948	1,850	865	2,715
Capacity in 2035	0	27,775	12,428	0	0	0	0	27,548	4,089
Annual Demand in 2035-2040	1,061	681	1,742	767	188	955	1,828	869	2,697
Capacity in 2040	0	24,370	3,718	0	0	0	0	23,203	0
Depletion Year	2020	2040+	2040+	2021	2033	2025	2021	2040+	2036

Source: Miami-Dade County, Department of Regulatory and Economic Resources, Research and Economic Analysis Section, 2019.

The South Tier has enough capacity to accommodate projected demand up to the year 2040. The single-family supply is projected to be depleted by 2029, whereas the multi-family supply is exhausted after 2040. The projected demand for housing is greater in the eastern half, and there is more capacity in there. This capacity is projected to be depleted after 2040. In the western half, the projected depletion year is 2038.

Table 1.1-11
Residential Land Supply/Demand Analysis
South Dade Tier, 2019 to 2040

Analysis Done Separately for Each Type, i.e. No Shifting of Demand between Single & Multifamily Type	Subtier								
	East of US-1			West of US-1			South Total		
	Single Family	Multi-Family	Both Types	Single Family	Multi-Family	Both Types	Single Family	Multi-Family	Both Types
Capacity in 2019	10,150	14,927	25,077	6,282	8,612	14,894	16,432	23,539	39,971
Annual Demand in 2015-2020	723	268	991	119	32	151	842	300	1,142
Capacity in 2020	9,427	14,659	24,086	6,163	8,580	14,743	15,590	23,239	38,829
Annual Demand in 2020-2025	1,059	425	1,484	855	255	1,110	1,914	680	2,594
Capacity in 2025	4,132	12,534	16,666	1,888	7,305	9,193	6,020	19,839	25,859
Annual Demand in 2025-2030	768	293	1,061	567	166	733	1,335	459	1,794
Capacity in 2030	292	11,069	11,361	0	6,475	5,528	0	17,544	16,889
Annual Demand in 2030-2035	709	267	976	507	145	652	1,216	412	1,628
Capacity in 2035	0	9,734	6,481	0	5,750	2,268	0	15,484	8,749
Annual Demand in 2035-2040	705	261	966	495	139	634	1,200	400	1,600
Capacity in 2040	0	8,429	1,651	0	5,055	0	0	13,484	749
Depletion Year	2030	2040+	2040+	2028	2040+	2038	2029	2040+	2040

Source: Miami-Dade County, Department of Regulatory and Economic Resources, Research and Economic Analysis Section, 2019.

Commercial, Office and Industrial Land

The Department's most recent assessment of commercial and industrial land availability is presented below. This will provide the reader with a picture of the existing land use character and development rates throughout the County for these types of uses.

The adequacy of the Plan's existing capacities to accommodate projected commercial and office development is evaluated both on a countywide basis, and for smaller areas of the County, namely the Planning Analysis Tiers and MSAs. Absorption tables are presented for Commercial and Office, and Industrial land.

Projected Commercial and Industrial Land Supply and Demand

The Research Section of the Department of Regulatory and Economic Resources has conducted an inventory (2019) of the supply, and assessed the use of land for industrial and commercial development in Miami-Dade County to determine whether it can sustain projected commercial and industrial demand through the years 2030 and 2040. Following are projections of commercial and industrial absorption in Miami-Dade County.

Commercial Land

The first step in deriving countywide control totals was to obtain existing commercial acreage, commercial employment, and total population for the years 2000 to 2019. Secondly, a linear regression was run with commercial acres being the dependent variable and commercial employment and population as the independent variable.

The historical population figures come from the U.S. Census Bureau. Commercial employment is derived from employment figures derived from the U.S Bureau of Economic Analysis and defined as 100 percent of employment in "retail trade", "finance and insurance", "real estate and rental and leasing", 75 percent of employment in "services" and 8 percent of "wholesale trade".

The regression coefficients were then applied to the independently projected population and commercial employment to arrive at projected demand for commercial land.

The next step consisted in the allocation of projected countywide demand for commercial land to each MSA. To obtain the MSA's share of the countywide demand for commercial land, the following procedures were followed: The annual change in "in-use" commercial land was calculated for the periods of two-year intervals from 2000-2001 through 2018-2019. Then the average of these periods, by MSA, was computed. If the average was negative, the MSA's share was set at zero. Next, the growth in population from 2019 to 2040, based on population projections for each MSA, was used. The final step involved averaging the annual growth in commercial land and the population growth for each MSA. This was done to better consider the historical demand for commercial land and the projected growth in population by MSA. Lastly, the countywide demand was distributed proportionately to the MSA's share of the total average growth (average of historical growth of "in-use" commercial land and projected population growth) for all MSAs. The result is an annual absorption rate for the 2019-2040 period.

Table 1 below presents countywide projections of commercial land absorption. For purposes of this analysis, the only vacant land included in commercial supply is land that is specifically zoned for business, professional office, office park, or designated "Business and Office" on the LUP map

of the CDMP. While vacant industrially zoned or designated land may be and often is used for commercial use (in particular for office development, but including retail uses such as hotels and restaurants), for purposes of this analysis none was included in the commercial land supply.

The first four columns of Table 1 summarize the result of applying the method described. Countywide, the 2,262.2 acres of vacant commercially designated land available in 2019 would still not be depleted by the year 2040, at the average annual absorption rate of 77.7 acres. However, the projected depletion year varies from Tier to Tier. Only in the South-Central and North Central Tiers will supply be depleted before 2040. However, individual MSAs reveal more variability. In MSAs 1.1-1.3, 4.4, 5.1- 5.8, 6.1, 6.2 and 7.6 the supply of commercial land will be depleted before 2030. It should be noted that MSA 7.6 lies almost wholly outside the UDB. The projected year of depletion provides only one indication of the areas within the County where additional land for commercial use may be warranted. However, it cannot be concluded that land for commercial use should automatically be added in the specific MSAs where the numbers indicate depletion of supply before the year 2030. Because of the dual purposes of commercial land use category, the land allocation process and planning for future land availability are more complex than for the case of residential or industrial land use.

One important consideration related to the absorption of commercial land in the future is the land cost factor. As the supply of vacant developable land keeps decreasing and land becomes more expensive, commercial developments will tend to be built and sized more efficiently by utilizing a higher ratio of building square footage to land acreage. As a result, the average annual absorption rate for commercial uses may be lower in the future than it has been in the past.

It is worth noting that by redeveloping or adding additional uses to existing sites, the existing supply could accommodate significant growth. A second consideration is that some commercial uses are “population serving” and should be distributed throughout the community with consideration for convenience to the residential population, while some commercial uses can be categorized as “export” uses which may be better located in areas having good transportation access, and where other similar or complementary uses can agglomerate into commercial or employment centers. In this regard, “export” oriented commercial centers - like regional centers, industrial centers, and transportation facilities - can help give structure to the urban pattern and comprehensive planning should foster this.

To gauge what is an appropriate allocation of commercial land to “population serving” commercial uses, the ratio of commercial acres per 1,000 persons by MSA, Tier, and countywide was analyzed. The final two columns of Table 1 indicate commercial acres per 1,000 persons for each MSA, Tier and the countywide average. The countywide ratio for 2030 is projected to be 4.7 acres per 1,000 persons declining to 4.3 per 1,000 persons by the year 2040. This assumes that no industrial land is used for commercial purposes and no further supply is added. While 4.7 acres of commercial land per 1,000 persons is the County average, this includes commercial uses that are characterized as “export” uses such as regional centers, and other such commercial uses. If a local area registers a commercial land/population ratio below average, it does not necessarily indicate an undesirable condition. However, those MSAs or Tiers showing ratios significantly below the Tier or countywide ratio should warrant closer review to determine whether the commercial needs of the area’s population would be adequately met.

Where both measures – projected commercial land depletion year and the commercial acres per 1,000 population ratio – indicate a possible future need for additional commercial land, it is probable that this need will become apparent during the projection period, unless additional land is designated on the LUP map for Commercial or Office use. Thus, both the amount of vacant

land and the adequacy of the commercial land to population ratio need to be considered when determining locations where additional commercial land should or need not be added.

Another factor that must be considered is the existence of vacant industrial land. There has been a continuing pattern in which there is much crossover in the use of industrial land for commercial purposes.

Table 1
PROJECTED ABSORPTION OF COMMERCIAL LAND
MIAMI-DADE COUNTY, FLORIDA 2019- 2040

Tier and Minor Statistical Area	Vacant Commercial Land 2019 (Acres)	Commercial Land in Use 2019 (Acres)	Avg Annual Absorption Rate 2019-2040 (Acres)	Projected Year of Depletion	Commercial Land per Thousand Persons (Acres) 2030	2040
North Tier						
1.1	3.8	40.00	0.52	2026	1.4	1.3
2.1	114.7	1,029.60	2.68	2040+	5.5	5.0
2.2	5.4	235.10	0.94	2024	3.8	3.6
2.3	165.7	298.10	2.91	2040+	5.0	4.7
2.4	36.4	427.80	0.94	2040+	5.1	4.7
3.1	593.1	910.10	8.84	2040+	5.9	5.5
Total	919.1	2,940.70	16.83	2040+	5.2	4.8
North Central Tier						
1.3	10.6	212.60	1.50	2026	1.6	1.5
3.2	190.4	1,459.10	5.92	2040+	8.6	7.9
4.1	35.1	345.60	1.36	2040+	3.6	3.3
4.2	38.9	418.20	1.74	2040+	4.6	4.1
4.3	12.1	641.70	0.94	2031	5.1	4.9
4.4	0.4	55.00	0.14	2021	3.1	3.0
4.5	12.1	214.00	0.73	2035	--	--
4.6	26.0	270.50	1.05	2040+	4.7	4.2
4.7	58.2	230.10	3.50	2035	2.3	2.0
5.1	7.5	455.30	1.84	2023	3.0	2.7
Total	391.2	4,302.10	18.71	2039	4.6	4.2
South-Central Tier						
1.2	0.0	76.70	0.08	2019	5.9	5.6
5.2	5.9	204.10	1.06	2024	2.3	2.1
5.3	16.5	570.90	1.83	2028	3.8	3.5
5.4	3.9	556.20	1.02	2022	5.1	4.8
5.5	3.9	558.70	0.97	2023	5.9	5.5
5.6	2.6	212.40	0.43	2025	5.8	5.3
5.7	3.0	246.30	0.30	2029	8.6	8.1
5.8	5.8	98.00	1.37	2023	2.4	2.2
6.1	24.9	504.00	5.41	2023	2.6	2.4
6.2	107.9	546.80	9.99	2029	3.8	3.5
Total	174.4	3,574.10	22.47	2026	3.9	3.6
South Tier						
7.1	68.4	307.50	1.01	2040+	4.9	4.4
7.2	55.1	205.40	4.05	2032	3.6	3.1
7.3	184.6	194.80	0.93	2040+	7.8	6.9
7.4	180.1	404.10	8.25	2040+	4.9	4.3
7.5	289.4	196.70	4.98	2040+	10.9	9.3
7.6	0.0	4.70	0.44	2019	0.5	0.4
Total	777.5	1,313.20	19.65	2040+	5.7	5.0
Grand Total	2,262.2	12,130.1	77.7	2040+	4.7	4.3

-- Insignificant population.
Source: Miami-Dade County, Department of Regulatory and Economic Resources, Planning Division, Research Section, January 2020.

Industrial Land

The adequacy of the Plan's existing capacities to accommodate projected industrial development is evaluated both on a countywide basis, and for smaller areas of the County, namely the Planning Analysis Tiers and MSAs. An absorption table is presented for Industrial land.

Projected Industrial Land Supply and Demand

The Research Section of the Department of Regulatory and Economic Resources conducts an inventory of the supply and assesses the use of land for industrial development in Miami-Dade County to determine whether it can sustain projected industrial demand through the years 2030 and 2040. Following is the methodology for this analysis.

Table 1 presents countywide projections of industrial land absorption. The first step in projecting Miami-Dade County's future industrial land use was to develop control totals for countywide use of industrial land in each projection year. Historical land use data from 2000 through 2020 was divided by industrial employment to obtain acre per employee ratios for each year. The average ratio was applied to industrial employment projections to obtain countywide projected demand for industrial land.

Historic industrial employment was derived from employment figures from the U.S Bureau of Economic Analysis and defined as 100 percent of employment in "manufacturing", 95 percent of "information", 92 percent of "wholesale trade", 30 percent of "construction", 20 percent of "transportation and warehousing" and 15 percent of "services".

The next step consisted in the allocation of projected countywide demand for industrial land to each MSA. To obtain the MSA's share of the countywide demand for industrial land, the following procedures were followed: The annual change in "in-use" industrial land was calculated for the two-year periods 2000-2001 through 2019-2020. Then the average of these periods, by MSA, was computed. If the average was negative, the MSA's share was set at zero. Next, the countywide demand was distributed proportionately to the MSA's share of the total average growth for all MSAs. The result is an annual absorption rate for the 2020-2040 period, presented in the fourth column of table 1.

The projected Year of Depletion in Table 1 is the result of applying the Average Annual Absorption Rate 2020-2040 to the Vacant Industrial Land 2020 presented in the second column of the table. Before drawing conclusions from Table 1, it is important to consider the assumptions and methods used in developing the information presented, the high potential for cross-over among the land uses which may occur on industrially designated land, and the spatial distribution of uses and sites in an area. A significant amount of cross-over can occur among business, office, and industrial uses, with commercial uses occurring in industrially designated land.

It is inappropriate to draw conclusions regarding the adequacy or inadequacy of supply in any individual MSA solely from the information provided in Table 1, as well as the projected supply and demand in a single MSA; it is also necessary to consider land in adjoining MSAs.

Table 1 provides the results of the analysis of the supply and demand for industrial land. In the North Tier, MSA 1.1 has no industrial land available, but it is not considered an industrial area. Likewise, in the North-Central Tier there appears to be no need for additional designations of

industrial land. The MSAs in the South-Central Tier mostly have small or no amounts of industrial land, and correspondingly low or no absorption rates. MSAs 1.2, 5.2, 5.5, 5.7, 5.8 and 6.1 have essentially no vacant industrial land available, they also exhibit very low absorption rates. The large supply in MSA 6.2 can meet the overall needs in this Tier up to 2030. Similarly, no MSA in the South Tier shows deficient industrial land supply at the time of this analysis. However, there is significant conversion of vacant industrially zoned land for other uses. If this conversion continues to increase, the depletion of industrial land will take place earlier than projected.

TABLE 1

PROJECTED ABSORPTION OF INDUSTRIAL LAND
MIAMI- DADE COUNTY, FLORIDA 2020 - 2040

Tier and Minor Statistical Area	Vacant Industrial Land 2020 (Acres)	Industrial Land in Use 2020 (Acres)	Avg Annual Absorption Rate 2020-2040 (Acres)	Projected Year of Depletion
North Tier				
1.1	0.00	0.90	0.03	2020
2.1	4.88	305.00	0.00	--
2.2	4.25	149.70	0.00	--
2.3	151.70	142.10	4.62	2040+
2.4	244.48	1775.80	16.03	2035
3.1	722.15	1136.60	9.55	2040+
Total	1,127.46	3,510.10	30.24	2040+
North Central Tier				
1.3	0.00	3.90	0.00	--
3.2	880.98	6202.70	47.08	2038
4.1	2.47	166.30	0.42	2025
4.2	40.68	770.00	1.02	2040+
4.3	2.41	507.40	0.00	--
4.4	0.00	3.70	0.00	--
4.5	22.78	104.20	0.00	--
4.6	18.16	315.40	0.28	2040+
4.7	5.09	116.90	0.00	--
5.1	10.45	39.50	0.00	--
Total	983.02	8,230.00	48.80	2040+
South-Central Tier				
1.2	0.00	0.00	0.00	--
5.2	0.00	4.60	0.00	--
5.3	9.21	49.20	0.00	--
5.4	0.54	155.70	0.52	2021
5.5	0.00	79.00	0.00	--
5.6	0.00	14.50	0.07	2020
5.7	0.00	2.10	0.01	2020
5.8	0.00	13.50	0.00	--
6.1	0.00	12.20	0.47	2020
6.2	92.63	618.50	9.08	2030
Total	102.38	949.30	10.15	2030
South Tier				
7.1	0.00	26.10	0.00	--
7.2	66.07	303.30	2.37	2040+
7.3	39.56	132.80	0.59	2040+
7.4	80.37	76.60	2.16	2040+
7.5	261.85	98.50	0.00	--
7.6	0.00	0.00	0.00	--
Total	447.85	637.30	5.11	2040+
Grand Total	2,660.71	13,326.70	94.30	2040+

-- Insignificant Demand

Source: Miami-Dade County, Department of Regulatory and Economic Resources, Planning Division, Research Section, December 2020.

Appendix 3

Description of Soils Classified as Farmland of Unique Importance

- ***Krome very gravelly loam (Soil Survey ID No. 7)*** *– This soil is suitable for a wide variety of fruit and vegetable crops, but special management is needed. This management includes yearly rock-plowing, bedding, regularly adding fertilizer, and irrigating during the winter growing season. Because of a favorable climate, the water available for irrigation, and the demand by northern markets, this high level of management is practical. This soil is suitable for the production of fruit and citrus, but this production requires trenching, drilling, or blasting into the limestone. Regular applications of fertilizer and irrigation water also are needed. This soil is suited to pasture. This soil generally is not used as rangeland or forest land. (Source: 1996 Soil Survey)*
- ***Chekika very gravelly loam (Soil Survey ID No. 23)*** *– This soil is suitable for a wide variety of fruit and vegetable crops, but special management is needed. This management include yearly rock-plowing, bedding, regularly adding fertilizer, and irrigating during the winter growing season. Because of a favorable climate, the water available for irrigation, and the demand by northern markets, this high level of management is practical. This soil is suitable for the production of fruit and citrus, but this production requires trenching, drilling, or blasting into the limestone. Regular application of fertilizer and irrigation water also are needed. This soil is suited to pasture. Common bermudagrass and improved bahiagrass grow well if the pasture is properly maintained. This soil is not used as rangeland or forest land. (Source: 1996 Soil Survey)*
- ***Biscayne Marl, drained (Soil Survey ID No. 16)*** *– All areas have been drained and cultivated at some time in the past. A water control system has been installed in most areas. If the water control system is properly maintained, this soil is well suited to a variety of shallow-rooted cultivated crops. Much of the cultivated acreage is used for corn, potatoes, snap beans, sorghum malanga, or ornamental trees and shrubs. Land grading and smoothing fill in the small depressions that are common in areas of this soil and thus improve surface drainage and permit more efficient use of farm equipment and more uniform application of irrigation water. Bedding is necessary if ornamental plants or root crops are grown. This soil is suited to pasture. Deferred grazing during the wet periods helps prevent compaction of the soil. This soil is poorly suited to the production of citrus and mangos because of the wetness. It is unsuited to the production of avocados. This soil is generally not used as rangeland or forest land. (Source: 1996 Soil Survey)*
- ***Biscayne gravelly marl, drained (Soil Survey ID No. 2)*** *– This very shallow, nearly level, poorly drained soil is on broad, low flats, in sloughs, and in traverse glades that extend from the Pineland Ridge. The water table in the Biscayne soil remains within 10 inches of the surface for 2 to 4 months during most years, receding to as deep as 36 inches during dry periods. All areas have been drained, rock-plowed or mechanically scarified, and cultivated at some time in the past. In most areas, a water-control system has been installed. If the water-control system is properly maintained, this soil is well suited to a variety of shallow-rooted cultivated crops. Much of the cultivated acreage is used for corn, snap beans, potatoes, malanga, or bananas. Yearly rock-plowing may be necessary to incorporate some of the finer textured soil material in solution holes. Bedding is necessary if root crops are gown. Important management practices include preparing a good seedbed and applying fertilizer according to the results of soil test and the needs of the crop. This soil is poorly suited to the production of ornamental trees and shrubs for nursery*

stock because of the depth to bedrock. It is poorly suited to the production of citrus and mangos because of the wetness. It is unsuited to the production of avocados. This soil is suited to pasture, common bermudagrass and improved bahiagrass grow well if the pasture is properly managed. This soil is not used as rangeland or forest land. (Source: 1996 Soil Survey)

- ***Perrine marl, drained (Soil Survey ID No. 6)*** *– This moderately deep, nearly level, poorly drained soil is on broad, low coastal flats and in transverse glades. A water-control system has been installed in most areas. If the water-control system is properly maintained, this soil is well suited to a variety of cultivated vegetable and grain crops. Much of the cultivated acreage is used for corn, potatoes, snap beans, sorghum, malanga, or ornamental trees and shrubs. Bedding generally is necessary if ornamental plants or root crops are gown. Important management practices include preparing a good seedbed, applying fertilizer according to the results of soil tests and the needs of the crop, and controlling weeds and bush. Because of a high pH, some micronutrients may not be available to certain crops. Boron toxicity may affect some crops. This soil is suited to pasture, Common bermudagrass and improved bahiagrass grow well if the pasture is properly managed. This soil is poorly suited to the production of citrus and mangos because of the wetness. It is unsuited to the production of avocados. This soil generally is not used as rangeland or forest land. (Source: 1996 Soil Survey)*

Appendix 4

Sprawl Indicators in State Law

Section 163.3177(6)(a)(9), Florida Statutes

a. The primary indicators that a plan or plan amendment does not discourage the proliferation of urban sprawl are listed below. The evaluation of the presence of these indicators shall consist of an analysis of the plan or plan amendment within the context of features and characteristics unique to each locality in order to determine whether the plan or plan amendment:

(I) Promotes, allows, or designates for development substantial areas of the jurisdiction to develop as low-intensity, low-density, or single-use development or uses.

(II) Promotes, allows, or designates significant amounts of urban development to occur in rural areas at substantial distances from existing urban areas while not using undeveloped lands that are available and suitable for development.

(III) Promotes, allows, or designates urban development in radial, strip, isolated, or ribbon patterns generally emanating from existing urban developments.

(IV) Fails to adequately protect and conserve natural resources, such as wetlands, floodplains, native vegetation, environmentally sensitive areas, natural groundwater aquifer recharge areas, lakes, rivers, shorelines, beaches, bays, estuarine systems, and other significant natural systems.

(V) Fails to adequately protect adjacent agricultural areas and activities, including silviculture, active agricultural and silvicultural activities, passive agricultural activities, and dormant, unique, and prime farmlands and soils.

(VI) Fails to maximize use of existing public facilities and services.

(VII) Fails to maximize use of future public facilities and services.

(VIII) Allows for land use patterns or timing which disproportionately increase the cost in time, money, and energy of providing and maintaining facilities and services, including roads, potable water, sanitary sewer, stormwater management, law enforcement, education, health care, fire and emergency response, and general government.

(IX) Fails to provide a clear separation between rural and urban uses.

(X) Discourages or inhibits infill development or the redevelopment of existing neighborhoods and communities.

(XI) Fails to encourage a functional mix of uses.

(XII) Results in poor accessibility among linked or related land uses.

(XIII) Results in the loss of significant amounts of functional open space.

b. The future land use element or plan amendment shall be determined to discourage the proliferation of urban sprawl if it incorporates a development pattern or urban form that achieves four or more of the following:

(I) Directs or locates economic growth and associated land development to geographic areas of the community in a manner that does not have an adverse impact on and protects natural resources and ecosystems.

(II) Promotes the efficient and cost-effective provision or extension of public infrastructure and services.

(III) Promotes walkable and connected communities and provides for compact development and a mix of uses at densities and intensities that will support a range of housing choices and a multimodal transportation system, including pedestrian, bicycle, and transit, if available.

(IV) Promotes conservation of water and energy.

(V) Preserves agricultural areas and activities, including silviculture, and dormant, unique, and prime farmlands and soils.

(VI) Preserves open space and natural lands and provides for public open space and recreation needs.

(VII) Creates a balance of land uses based upon demands of the residential population for the nonresidential needs of an area.

(VIII) Provides uses, densities, and intensities of use and urban form that would remediate an existing or planned development pattern in the vicinity that constitutes sprawl or if it provides for an innovative development pattern such as transit-oriented developments or new towns as defined in s. 163.3164.

Appendix 5

Urban and Agricultural Land Use Trends and Projections Report

2005-03

Urban and Agricultural Land Use Trends & Projections

1985, 1994, 2000, 2025, 2050
Miami-Dade County, Florida

Urban Development Expansion

The attached Table 1 contains actual land use data for Miami-Dade County for three historical years, 1985, 1994, and 2000. Using these three trend years, "baseline" projections to 2025 for the large aggregate categories of land use were prepared. This was accomplished by first deriving ratios of population and employment to the developed urban land for those years.[1] Then applying a log-linear regression equation to the ratios a value for the year 2025 was obtained. This ratio was then applied to the average of population and employment from existing projections for those variables to derive the associated urban land use for 2025. Countywide, this figure is 297,863 acres, an increase of 49,415 acres from 2000. This exceeds the stock of undeveloped private land by only 1,666 acres so it would seem that little agricultural land would be converted during this time period. However, as the table shows the stock of agricultural land declines substantially (by 26,437 acres). This would occur under the likely scenario that new development takes place incrementally starting from the existing Urban Development Boundary (UDB).

The approach used to reach these final results proceeded in steps. A judgment was made about the future increase in protected and government owned land. From 1985 to 2000 more than 61,000 acres was added to this category. The present information available from various sources indicates that this magnitude will not be repeated out to 2025. The best assumption appears to be that only 3,750 acres (150 acres/year) would be transferred to this category over the 25-year period from areas that would affect agriculture. Increases in the amount of inland water were estimated by using historical relationships between urban development and the associated lake excavations. This resulted in projecting a figure of 3,301 acres. With these three variables in place, the next step was to determine how the growth in urban developed land would be allocated between undeveloped private land and agriculture in accordance with the assumption stated above (from the UDB outward, as needed).

[1] In the average of population and employment, population was given double weight since residential acreage greatly exceeds commercial and industrial acreage and the three together are a proxy for all urban land uses. The regression equation is given by Y=a+b ln X where Y=total urban acres and X= ratio (Pop)2+emp./urban acres.

As Table 2 shows, as of 2000 within the UDB there were 18,330 acres of undeveloped private land and 12,958 acres of agriculture. To meet the requirements for urban development, which includes only urban land uses, the increase in protected land and inland water, this total of 30,738 acres (allows for 3 percent unused) is exhausted just beyond the year 2015. At that time the UDB would need to be adjusted. The first land to be utilized would very likely be the undeveloped private land in the Urban Expansion Area (UEA) and the agricultural land within the UEA.[2] This totals about 10,400 acres, most of it agriculture land. At this point about 18,000 acres of agricultural land will have been converted. However, to absorb the urban growth out to 2025 more than 8,000 additional acres of agricultural land is converted.

Table 1
Land Use Trends & Projections
Urban Development Accommodation
Total County
1985, 1994, 2000, 2025
Miami-Dade County, Florida

	1985		1994		2000		2025	
Land Use	Acres	%	Acres	%	Acres	%	Acres	%
Developed-Urban Uses*	209,564	16.9	236,737	19.2	248,448	20.2	297,863	24.2
Undev- Private	139,253	11.2	71,398	5.8	47,749	3.9	17,720	1.44
Agriculture**	94,932	7.7	90,388	7.3	80,403	6.5	53,966	4.4
Protected & Gov. Owned***	794,789	64.2	836,098	67.7	856,013	69.5	859,763	70.0
Total Land	1,238,538	100	1,234,621	100	1,232,613	100	1,229,312	100
Water^	309,837	-----	313,754	-----	315,748	-----	319,049	-----
Total County	1,548,375	-----	1,548,375	-----	1,548,361	-----	1,548,361	-----

* Residential, Commercial, Industrial, Hotels, Institutional, Urban Parks and Beach, Transportation, Comm., and Utilities

** Groves, Crops, Grazing, Horse trng.& stables, Poultry, Fallow land, Plant nurseries, Aquaculture, Farm storage& Other

*** National Parks, Water Cons. Areas, CDMP Env. Protected and Vacant Government Owned. Assumes 150 acres per year average increase, 2000-2025.

^ Inland and Coastal Water; change is entirely due to additions to inland water.

Source: Research Section, Miami-Dade Department of Planning & Zoning

[2] Specific crop losses within the UDB and UEA are estimated (acres) at: Vegetables-8,140; Nurseries- 3,452; Fruit Groves- 1,000 plus some fallow land and miscellaneous agricultural uses totaling about 500 acres. This does not include a few thousand "out" acres which consist of parcels that were recently in agriculture but have been withdrawn and no longer receive an agriculture exemption. Source is special GIS coverages found in University of Florida, Institute of Food and Agricultural Sciences, Miami-Dade County Agricultural Land Retention Study, Vol.1, Summary and Recommendations, April, 2000.

Table 2
Land Use Trends & Projections
Urban Development Accommodation
Within Existing UDB
1985, 1994, 2000, 2025
Miami-Dade County, Florida

	1985		1994		2000		2015*	
Land Use	Acres	%	Acres	%	Acres	%	Acres	%
Developed-Urban Uses**	180,224	76.3	205,580	80.9	216,024	85.1	244,216	96.9
Undev- Private***	34,632	14.7	27,750	10.9	18,330	7.2	338	0.1
Agriculture^	18,033	7.6	17,472	6.9	12,958	5.1	-	0
Protected & Gov. Owned^^	3,208	1.4	3,386	1.3	6,682	2.6	7,575	3.0
Total Land	236,097	100	254,188	100	253,994	100	252,129	100
Water^^^	9,907	-----	12,107	-----	12,297	-----	14,162	-----
Total UDB	246,004	-----	266,295	-----	266,291	-----	266,291	-----

* All values are actually for first quarter of 2016.
** Residential, Commercial, Industrial, Hotels, Institutional, Urban Parks and Beach, Transportation, Comm., and Utilities
*** Three percent of undeveloped private land is assumed to be held from development.
^ Groves, Crops, Grazing, Horse trng.& stables, Poultry, Fallow land, Plant nurseries, Aquaculture, Farm storage& Other
^^ National Parks, Water Cons. Areas, CDMP Env. Protected and Vacant Government Owned. Assumes 886 acres added, 2000-2015. This increase is one-fourth annual rate of 1985-2000.
^^^ Inland Water. Increase is derived using 1985-2000 ratio of inland water to developed land.

Source: Research Section, Miami-Dade Department of Planning & Zoning

The reason for this is that a large portion of the 47,749 acres of undeveloped private land countywide is in scattered sites or larger pieces on the outlying fringe which will not be developed until much later, if at all, except at very low densities. Some of this land may also be purchased by governmental agencies. In this analysis a relatively small amount of this scattered land was assumed to be developed (about 2,000 acres). Again, this estimate was based on the historical experience from 1985-2000 of residential expansion beyond the UDB.

Table 1 provides the land use breakdown for the year 2025 after all conversions are made. About 24.2 percent is urban developed land, with only 1.44 percent remaining as private undeveloped and 4.4 percent agriculture. The largest use is the various protected and vacant government owned land; the majority being in the first category. Almost 54,000 acres of agricultural land is still available and, under the growth assumptions herein, it would be largely contiguous.

Of course, these projections are based on the assumption of a continuation of essentially the same land use trends that occurred during the 1985 to 2000 period. If in the future higher densities can be achieved then considerable reductions in the amount of urban land required can be realized. For example, a modest 12 percent increase in the residential population density from the year 2000 figure would result in a savings of 15 square miles of land by 2025 (10,000 acres). This could be available for agriculture. But even absent this, the analysis presented here indicates that by 2025 a substantial supply of land for agriculture will be retained despite the very large growth in urban land uses. However, the viability of agriculture in the future is dependent upon

many variables other than urban growth pressures. Thus, the long-term future of agriculture land use needs must be assessed independently.

Land Requirements for Agriculture

Before doing this it is instructive to list recently published figures for total agricultural land from three reliable sources. The U.S. Census of Agriculture reports 85,093 (published in 1999 for the year 1997); the Miami-Dade Department of Planning and Zoning land use counts, 80,403 (2000); the University of Florida GIS coverage, 76,423 (2000).[3] Given the difficulties of arriving at accurate counts of land used for all types of agricultural purposes, these values are quite consistent with each other even though different methods were used in measurement.

A good place to start in projecting future use is to review the historical trend for agriculture land use, and data from the five year Censuses of Agriculture by the U.S. Department of Commerce, Bureau of the Census, is one of the best sources. Data from the six agricultural censuses are available (Table 3). The three variables shown, Acreage in Farms, Total Cropland and Harvested Cropland show a high degree of stability. Over this 23-year period Acreage in Farms has a mean value of 85,691 and figures for all years except 1978 are quite close to this (the 1974 number is 11 percent below). The same is true for Total Cropland with 1974 now being the outlier with a mean value of 68,674. The variable, Harvested Cropland has the lowest variation of the three with a mean of 60,798 and no value differing by more than eight percent. Not surprisingly, regression analysis yields almost a straight line projection for the first two. Total farm acreage drifts downward slightly and total cropland shows a very small upward tilt. Harvested cropland however, displays a fairly strong upward trend.[4]

Table 3
Trends and Projections of Agricultural Land
1974-2025

Year	Acreage in Farms	Total Cropland	Harvested Cropland
1974	76,318	62,096	55,730
1978	98,574	74,506	64,084
1982	87,420	72,784	58,940
1987	83,061	66,313	61,997
1992	83,681	68,795	61,342
1997	85,093	67,550	62,693
2005	**84,706**	**68,780**	**64,365**
2015	**84,217**	**68,833**	**66,133**
2025	**83,731**	**68,885**	**67,893**

Note: Bold indicates projected values.

Source: U.S. Department of Commerce, Economics and Statistics Administration, Bureau of the Census, Census of Agriculture, 1974, 1978, 1982, 1987, 1992, and 1997. U.S. Government Printing Office (Washington, D.C.).

Projections by Research Section, Miami-Dade Department of Planning & Zoning.

[3] This figure does not include "out" land.
[4] The regression is a simple time trend (log linear): Y= a+b ln X; Y= total ag. Acres and X = year value.

While these Census of Agriculture data are probably the most reliable and certainly the most consistent source, the period since 1997 is crucial in making any prognostication of long-term trends. Several events have occurred since that date which have significant implications for the future of agriculture in Miami-Dade County.[5] The impact of these events has shown up in the data as the 2000 total for agricultural acreage is given as 80,403 compared to 90,388 in 1994.[6] When this value is added to the six data points from the Agriculture Censuses a decidedly downward trend appears for total farm acreage, as shown below. The total for 2025 is now 4,500 acres below the value in Table 3.

Acreage in Farms: Total-Revised

1974	1978	1982	1987	1992	1997	2000	2005	2015	2025
76,318	98,574	87,420	83,061	83,681	85,093	80,403	82,229	80,726	79,230

Likewise, when an estimate for year 2000 is provided for acreage of harvested crops, the projected growth shown in Table 3 drops off to almost a straight line projection (see below).[7] No reliable 2000 estimate for total cropland is available.

Acreage in Farms: Harvested Crops-Revised

1974	1978	1982	1987	1992	1997	2000	2005	2015	2025
55,730	64,084	58,940	61,997	61,342	62,963	58,059	61,415	61,975	62,532

These results are not definitive but certainly emphasize the importance of utilizing more recent data in constructing future projections. The recent University of Florida study of Miami-Dade agriculture has done this and a particularly important analysis is displayed in Table 4, the contents being taken from that document. As the authors of the study state, the table is designed to provide a "more current picture of the economic health of the most important vegetable and fruit crops" grown in this area. The data runs from the 1980/81 season to 1999/00 with tomatoes being 2000/01. The full table in the report also contains data on revenues but the authors note that; "Acreage trends are important because they are thought to reflect profitability over time".[8] Acreage utilized is thus a prime indicator for the bundle of factors that determine profitability. And it is expectations of profits which dictate the ultimate health of an industry. The eight commodities shown in the table have a total of 45,200 acres in production which is almost 80 percent of the estimated 58,059 harvested acres for all commodities shown above. Two of the eight crops clearly show statistically significant downward trends and a third, limes, has practically disappeared although statistics are not shown.

[5] These include Hurricane Andrew, the implementation of NAFTA, several recent years of heavy flooding, and the citrus canker eradication program, along with continued intrusion from urban development.
[6] Measured by Research Section, Miami-Dade Department of Planning & Zoning, 2001.
[7] The estimate for 2000 was made by using data provided in the Miami-Dade County Agricultural Land Retention Study, Summary and Recommendations & Appendix B, Economic Issues, prepared by the University of Florida, Institute of Food and Agricultural Sciences, April, 2002. See List of References for specific volumes and tables.
[8] Ibid. Summary & Recommendations, p.26.

Table 4
Acreage Trends for Major Vegetable and Fruit Crops
Miami-Dade County

Commodity	Year	Latest Acreage 1,000 Acres	Change from previous year 1,000 acres/year	Time Trend[a] 1,000 acres/year		P-value[b] Probability
Snap Beans	1999/00	18.50	1.00	-0.070	N.S.	0.562
Tomatoes	2000/01	3.66	0.53	-0.567	**	1.15E-10
Squash	1999/00	7.35	-0.45	0.124	**	0.004
Sweet Corn	1997/98	4.23	0.98	0.090	*	0.015
Potatoes	1999/00	2.90	-1.00	-0.092	**	0.001
Avocados	2000/01	6.0	0.10	0.038	N.S.	0.346
Mangos	1998	1.4	0.00	-0.008	N.S.	0.665
Limes	2000/01	1.15	-1.65	N/A	N/A	N/A

[a] Statistical significance of the time trend coefficient at the 0.05 probability level is indicated by "*" and at the 0.01 probability level by "**". Coefficients that are not statistically significant at the 0.05 level are labeled "N.S.".

[b] The P-value is the probability that the coefficient values for the time trend in the previous column are actually equal to zero, or that there is no statistical trend. P-values equal to or smaller than 0.05 are deemed to be statistically significant.

Source: University of Florida, Institute of Food and Agricultural Sciences. Miami-Dade County Agricultural Land Retention Study, Appendix B, Economic Issues, Section 2, Table 1.

In order to come to a conclusion regarding the future, this table is examined taking each crop individually. In addition to the trends developed and discussion provided for each crop in the IFAS study, the conclusions presented here are also influenced by very recent analysis of urbanization pressure. Specifically, data from the Miami-Dade Property Appraiser was assembled which showed building activity in the major agriculture area for the years 1998 through 2001.The main purpose of this undertaking is to make an assessment of the extent of "fragmentation" of agriculture by the construction of residential structures on land primarily in the AU and GU zoning districts which requires a minimum of five acres. Complete urbanization such as will occur within the UDB and UEA clearly will supplant agriculture. Additionally, the proliferation of the very low-density residential development will be incompatible with most agricultural production for commercial markets. The most pressure is on field crops such as beans, tomatoes and squash which require relatively large tracts of land for efficient production (preferably at least 40 acres). The more land that is divided into five-acre tracts the more difficult it is to assemble the larger tracts. This is also true for fruit groves, but to a lesser extent (a ten acre tract can suffice for a profitable operation if well managed). Nurseries are even less affected from a tract size standpoint. However, other conflicts occur if residential development becomes pervasive in the agricultural area, even at these very low densities. Simply put, the area moves from being rural to being semi-rural with the majority of residents not committed to commercial agriculture.

Even though a trend of development of one unit per five acres is recognized, precise data on its magnitude are ambiguous. The Department's land use files show that between 1994 and 2000, there were 334 acres of residential development outside the UDB on agriculturally designated land. This implies 668 units since the housing "footprint" which is measured typically averages

one-half acre. This gives an annual average of 111 units compared to 73 units per year for the period 1994-2001 using Property Appraiser files. The difference might be explained by the slightly different time periods and methods, but the actual number is not that important; the trend is clear. For the purpose here, the significant information is the location of this activity which is provided by the Property Appraiser data. In general, that shows that current vegetable production areas are most impacted, fruit groves somewhat less so and nurseries least of all. If even the lower figure of 73 units per year is used, extending that average out to 2025 gives an additional 1,752 units. With a minimum of five acres required to build a house, this means at least 8,750 acres have been partially urbanized; almost certainly to the detriment of agriculture. Obviously, if the higher unit average is selected, this acreage total would increase substantially. With this information and the crop acreages referred to in footnote #2, an evaluation of each crop's potential is undertaken.

Snap beans show a declining trend over the 20-year period but it is not significant statistically. If the 70 acres per year were accepted it would mean a loss of 1,750 acres. The 20-year average in production is 18,000 but it seems unrealistic that this can be retained even though snap beans have been quite profitable recently. A reduction of 1,750 acres would be about ten percent of the historic average which seems too low given the losses within the UDB and the urbanization pressures anticipated. Also, at some point snap beans will likely be susceptible to competition from off-shore sources and the domestic market is not a rapidly expanding one. Given these factors, at least a 25 percent reduction in snap bean acreage appears likely

The future for tomatoes is not bright, primarily due to foreign imports and sometime between the present and 2025 commercial production will likely cease but perhaps 500 acres will remain to supply the local market. Squash shows an upward trend of 124 acres annually that, if carried out to 2025 would just about duplicate the growth from 1980/81 to 1999/00 which appears unrealistic. The regression result was heavily influenced by the low acreages of the early 1980s and the very high figures of the past three seasons of data (3,900 acres in 1980; 7,350 in 1999). In fact squash acreage has been quite variable, ranging from a low of 3,400 to a high of 7,800. A realistic assumption for 2025 might best be a reversion to the level of 1980, i.e. 3,900 acres. . A similar situation holds for sweet corn with its positive time trend of + 90 acres per year implying an addition of 2,250 acres by 2025. However, compared to the historic trend of 2,800 acres in production, this seems high. The last five years for which data are available (1993-1998) the average jumped to 3,900 but this too may be unsustainable. A compromise between these two figures of about 3,000 acres in the out year may be reasonable. Sweet corn production may also be supported by the growth in the local consumption market. The last of the vegetables in Table 4 are potatoes and a declining trend is calculated. The 20 year average is 4,800 planted but the year 2000 figure was a historic low for the period; only 2,900 acres. Extending the time trend loss of 92 acres annually predicts a decline of 2,300 acres. It is difficult to fault this conclusion, the question being how much acreage will remain to supply the local market. As an approximation 500 acres will be assumed.

If the above assessment is accurate, it gives a total acreage in 2025 for these five vegetables of 21,400 versus 36,640 for the years reported in Table 4. Next, the three fruits included in the table will be discussed.

Starting with the last one, limes, the future seems very problematical. The ravages of Hurricane Andrew coupled with the citrus canker outbreak practically eliminated the lime industry. It is reported that some lime acreage is being replanted with other tree crops. The retention of the current acreage (about 500 acres) is probably the best to be hoped for. The latest data for avocados shows 6,000 acres being harvested. In 1987/88 over 11,000 acres were in production but land in avocado groves was trending down even before Hurricane Andrew wiped out about 2,500 acres. Since then acreage has held steady at about the 6,000 level but some further decline seems likely despite the time trend in Table 4 being positive (not statistically significant) at 38 acres per year. There is almost sure to be further competition from Mexico which will erode the market for the Miami-Dade product. However, even accepting that avocado groves can exist rather well with increasing urbanization, some further decline in commercial acreage is probably a foregone conclusion due to the "one house on five acres" trend. A figure of 4,000 acres for 2025 may be attainable. The mango story is similar to the one for avocados. From just under 1,500 acres in 1980, bearing acreage expanded to 2,500 in 1989 and held steady until raked by Hurricane Andrew in 1992. Since then acreage has held steady at about 1,500, the same as in 1980. Increases in this level are highly unlikely due to strong competition, mostly from Mexico. As with avocado groves, the mango counterpart can also exist with expanding urban growth so a somewhat arbitrary number of 1000 acres is suggested for 2025. Thus, the 2025 total for the three major fruits is 5,500 acres compared to 8,550 listed in Table 4.

Overall, the projected acreage for 2025 for the eight commodities is 27,200 compared to the 45,200 total of Table 4. Given the various pressures being exerted on South Miami-Dade agriculture and the uncertainty regarding their future magnitude and direction, this acreage projection must be considered a best attempt at interpreting the existing evidence. If anything, it may be optimistic. Table 1 shows a drop of almost 10,000 acres for the six years between 1994 and 2000 albeit for total land in agriculture. In so far as possible the figures referred to above are for harvested acres.

There are several other crops that contribute to the totality of Miami-Dade agriculture. These are other traditional vegetables such as cucumbers, eggplant, strawberries, bell peppers, okra and cabbage with a combined acreage of 4,120 in 1997/98, the latest available. Then there are tropical vegetables with boniato and malanga far and away being the most significant with a combined 6,000 acres out of the estimated total for the many tropical vegetables of 6,609 acres (1997/98). Finally, there are the minor tropical fruits, the major ones being lychee, carambola, longan, mamey sapote, banana, guava, and papaya. There are more than a dozen other unique tropical fruits grown in the area but the combined acreage is under 300. The total for all tropical fruits in 1997/98 was 2,424 acres. The most recent estimate of land devoted to these crop groups is 13,153, not a trivial number but projecting these acreages is more difficult for a number of reasons. Principal among these are often a lack of adequate time series data. Many of these products are primarily for specialty markets and often only a very few growers are devoting acreage to them.

Taking them in groups, it appears almost certain that other traditional vegetables will decline in the future. There is strong competition for many of these so the local market may be all that is left by 2025. The assumption is made that the current figure of 4,120 will drop by half by 2025 to a level of 2,060. Tropical vegetables should fare relatively well into the future. Most of this production is for export to niche markets in other areas of Florida and to the Northeast. There is

also a substantial local market which will likely grow as the Hispanic population increases. It is assumed that acreage for this group will stabilize at 6,000 acres. The same conclusion is adopted for the minor tropical fruits; the existing small acreage should stabilize. These fruits all have some local market and export niche markets. Expanding these markets would be difficult but without that any significant increase in production will rapidly drive down prices. But since the acreage required for this collection of tropical fruits is small and the niche markets will probably expand somewhat, future success for these fruits may be assured. A total of 2,500 acres is assigned. Together, these estimates amount to 10,560 acres for these three minor crop groups in 2025.

Lastly, the ornamental horticulture industry has to be examined. The decade of the 1990s witnessed rapid expansion of the nursery industry in Miami-Dade County. In 1992 there were 6,069 acres devoted to nursery and greenhouse crops and by 2001 the estimate was more than 12,000; almost a doubling. Clearly this rate of growth cannot continue and it may even be that there is over capacity presently. The next few years will provide an answer. In the meantime, in the light of evidence of increasing competition from other areas in Florida and some indications that portions of the industry are earning low rates of return it is not expected that significant growth is in the cards.[9] In fact, given that 3,452 acres will be lost when the UDB and UEA buildout, unless these can be relocated further west, total acreage will be below 9,000. Since nurseries will be competing with urban uses for the remaining land, it might not be feasible. An estimate of 8,000 acres is put forth as reasonable for the year 2025.

Accepting that the previous review of the data and conclusions drawn are valid, following is a summary of numeric results.

Total Harvested (Producing) Acres in Year 2025

Traditional Vegetables:	21,400
Major Fruits:	5,500
Other Traditional Veg.:	2,060
Tropical Vegetables:	6,000
Minor Tropical Fruits:	2,500
Ornamental Horticulture:	8,000
Total	45,400

Using this total figure for harvested acres, a total agricultural acreage can be derived by using the ratio of harvested to total acreage in farms from Table 3. This value is .811 and it is higher than the average from the 1974-1997 Agriculture Census figures of .711. This trend seems reasonable since with a reduced amount of agricultural land available and higher land costs, the product mix would most likely be chosen to avoid having much fallow land sitting idle. Using the .811 ratio gives a figure of 10,580 acres for fallow and other less intensive uses. Thus, a somewhat higher ratio of .875 is selected which implies a total of 51,885 acres required for agriculture in 2025.[10] This figure is considerably less than the 79,230 acres resulting from the time trend analysis. This is not unexpected. The trend analysis had as the basis a 23-year period in which local agriculture

[9] Ibid. Appendix B, Section 3, p. 170 addresses the business analysis of ornamental plant nurseries.

[10] This figure includes, in addition to the categories listed, some small amount of acreage for pasture & grazing, aquaculture, bee keeping and miscellaneous activities.

adapted to many changes and yet maintained a strong presence in the County. The next 23 years are undoubtedly to be an even greater challenge and the impacts on agriculture have been assessed, hopefully in a reasonable manner in light of recent events. If so, then it appears that accommodating urban growth will leave just sufficient acreage for agriculture in 2025, with about 52,000 required versus 54,000 available. Of course, these are rather gross estimates and it is an open question with respect to the actual product mix.

The preceding analysis is based on fairly extensive data, some extending back almost as many years as the projection period. Even so, it should be recognized that the final results have a rather high degree of uncertainty, i.e. a range of possible values around the ones shown.

Extending this analysis further out to the year 2050 must be viewed as essentially a hypothetical exercise given the length of time involved. Even so, the following is offered for consideration. Population and employment projections were developed out to the year 2050. The historical relationship between urban land use and the growth in population and employment was then used to project total urban land in 2050. This figure is 336,354 acres; 38,483 more than the amount projected for 2025. If the policy is simply to continue accommodating urban expansion, a good portion of this could come from the remaining undeveloped private land. But not all of this land is useable or it would be too costly to develop so probably about two-thirds of it would be consumed. In that case, over 26,000 acres would have to come from the remaining agricultural land. This still leaves about 27,000 acres of agricultural land and the question is; would this be sufficient to sustain a viable agricultural presence in Miami-Dade County? Certainly the ornamental horticulture industry and some high value vegetables and fruits could exist even given the massive urban growth. Research has shown that significant amounts of "adaptive" farming continues to thrive in and around most of the large metropolitan areas in the United States. If the 52,000 acres is used as another point with the 1985, 1994 and 2000 agriculture land use figures (Table 1) and the regression extended to 2050, a derived value for agriculture is 25,580 acres. This theoretically could be accommodated on the 27,000 acres of agricultural land remaining. What the prospects may be for each commodity group individually is unknown.

Accordingly, the following numbers are provided based on the same shares for each group as they are in 2025.

Total Harvested (Producing) Acres in Year 2050

Traditional Vegetables:	10,614
Major Fruits:	2,688
Other Traditional Veg:	1,008
Tropical Vegetables:	2,687
Minor Tropical Fruits:	1,223
Ornamental Horticulture:	3,918
Total:	22,390

Using a ratio of .90, this harvested acreage converts to 24,880 acres of total agricultural land. This total is 2,120 acres below the projected amount of agricultural land remaining under the urban growth accommodation alternative. It should be possible to maintain this agriculture presence with appropriate development regulations, but it will not be the major economic activity that it presently is in Miami-Dade County.

Source: Prepared by Miami-Dade Department of Planning & Zoning, Sept. 4, 2002. Revised, October 9, 2002.

Appendix 6

Public Outreach Comments

Brown, Kimberly (RER)

From: Regency <rafael@regencypool.com>
Sent: Wednesday, March 17, 2021 12:55 PM
To: UEA Study Comments (RER)
Subject: EXPANSION AREAS

Dear sirs,
Miami-Dade County is like a “island” limited on boundaries mostly by water, east (Atlantic) and west (Everglades), so north and south is the common sense to continues development low density areas, but limited too. Time to rezoning old communities and residential areas in order to increase density, building vertical products, understanding subsoil is a challenge due to water table.
Swimmcerely,

Rafael Imbert,
Assoc. AIA/CPC
Founder
Regency Pool & Spa, Inc.
Prime Aquatic Consulting. Inc.
Sent from my iPadPro

Brown, Kimberly (RER)

From: Maritza DeMaintenon <m.demaintenon@icloud.com>
Sent: Wednesday, March 24, 2021 1:03 PM
To: UEA Study Comments (RER)
Subject: Homestead sprawl

If this is approved, it will contribute to our (yours included) increasing threat to our food security. Please, if you value what's left of our lovely drives through rural South Miami- vote No!

Gracias,
Maritza S. Fuentes

Brown, Kimberly (RER)

From: susan kurzban <susan.kurzban@icloud.com>
Sent: Wednesday, March 24, 2021 1:42 PM
To: UEA Study Comments (RER)
Subject: UDB

We are against any building outside the protected property. This land needs to be preserved for preservation and agriculture. We certainly have enough land to use for commerce and industry without ruining what remains in these protected spaces.
Susan Kurzban
Susan.kurzban@icloud.com
305 992 3353
33176

Sent from my iPhone

Brown, Kimberly (RER)

From: Miami Crystal <tomboycemiami@gmail.com>
Sent: Friday, March 26, 2021 4:43 AM
To: UEA Study Comments (RER)
Subject: Comment on expansion of or waiver to the Urban Development Boundary.

https://www.miamidade.gov/global/news-item.page?Mduid_news=news1615993637790 54

The Draft Urban Expansion Area Report responds to Comprehensive Development Master Plan (CDMP) Policy LU-8J, which was adopted by the Board of County Commissioners on July 22, 2020. The policy directs completion of a study that addresses the following:

- additional areas that may be identified as urban expansion areas, with a goal of replacing the 1,993 acres that were proposed for removal in Application No. 5 of the Evaluation and Appraisal Report Amendments in the May 2019 CDMP Amendment Cycle, and
- potential additional uses that would be appropriate for the Urban Expansion Areas, particularly near the Homestead Air Reserve Base.

Comments received on or before April 15, 2021

I am writing in this comment period to strongly opposed to the expansion of or waivers to the Urban Development Boundary. As you know UDB is designed to prevent uncontrolled urban sprawl and protect agricultural and environmentally sensitive lands.

Given the scientific consensus on sea level change that the county and municipalities and in fact the entire nation has recognized, the current statement above should be expanded to include: preventing cost shifting from developers and land speculators onto the county and national, tax base that would occur by expanding urban sprawl into low lying areas pone to flooding , poor drainage, and especially vulnerable to sea level rise. These areas need to remain as buffer areas and not developed

In addition to the county's own draft of the urban expansion area report I could cite all the recent studies by individual cities and Universities regarding the availability of redevelopable land and vacant land within their munipalities which would improve existing service efficiencies, the tax base, while reducing cut through traffic in these area but I'm sure you are well aware of them.

Instead I will emphasize that the lands proposed for expansion will be the first to surfer from catastrophic flooding by hurricanes and the anticipated increase in torrential down pours that will occur because of global warming, amplifying the drainage problems of these low lying areas after such storms as sea level rise accelerates. We area already paying home owners to move out of similar areas with repurchase agreements as maintain them is far more costly if not impossible.

Additionally the expansion would further aggravate the transportation problems in the county that always accompanies urban sprawl despite what paid transportation experts hired by developers state in return for profitable contractual engagement from their developer clients.

The only reason developers want to expand into these areas is that they have already purchased the land in anticipation of an expansion, or have purchased options to buy the land at an advantageous set price, as is easier to develop these areas rather than create assemblages of brownfield land inside the UDB or vacant properties that are of smaller size and a little more costly to develop that wide open tracts of farm or wetlands outside the current UDB. Many have invested in politicians political campaigns via pacts for years anticipating that the next cycle will be “their time”.

This amounts to putting the profit of land speculators above holding the line on the costs to the environment, traffic, and associated infrastructure costs such as roads, bridges, water and sewers, utilities etc., and shifting those cost onto the tax payer in the rest of the county and the disaster recovery cost onto the nation as a whole. A strategy that voters and board members and County officials have wisely rejected time and time gain for valid reasons.

I urge you not to given in to lobbying pressure and maintain the UDB.

Respectfully, Tom Boyce
2699 Tigertail Ave.
#54
Miami, Florida
(305) 857-04766

Sent from Mail for Windows 10

Brown, Kimberly (RER)

From: Duane Smith <airborneshodan@yahoo.com>
Sent: Friday, March 26, 2021 5:36 PM
To: UEA Study Comments (RER)
Subject: Homestead Airbase UDB

We need to keep farmland around the Homestead Air Base not only for environmental reasons, but to preserve our resilience to natural disasters. When Hurricane Irma arrive, at one point we were all fish in a barrel that lived east of US1, subject to a seven foot storm surge and no room to escape with the evacuation routes overwhelmed. My family evacuated five days out and it took three days to reach our second home in North Carolina. The expansion of agricultural lands to residential is especially troublesome. The base has fudged its sound level contours for the F-16 and will presumably fudge the F-35 sound contour levels for environmental study. The current study shows the FAA approved level of 65 db to be well within the base. I am recording an average of 71 db in a calibrated sound meter and a high of 100 recorded inside my house located a 1/2 mile north of the base. For reference 65 db is equivalent to your garbage disposal going off in your kitchen. The F-35 is four times as loud.

Sent from Yahoo Mail on Android

LAW OFFICES
FRANCISCO J. PINES, P.A.
3301 PONCE DE LEON BOULEVARD
SUITE 220
CORAL GABLES, FLORIDA 33134
OFFICE: 305.529.0317
FACSIMILE: 305.444.1273

April 6, 2021

Lourdes M. Gomez, AICP
Director of Regulatory & Economic Resources
Miami-Dade County
111 N W First Street, 12th Floor
Miami, FL 33128

Via Emails: Lourdes.Gomez@miamidade.gov
UEAStudyComments@miamidade.gov

RE: Comments supporting UEA Study as written by RER-Staff Transmittal of Draft Urban Expansion Area Report provided pursuant to CDMP Policy LU-8J / Deferral on portion of Application No. 5 of the May 2019 CDMP Amendment Cycle

Dear Ms. Gomez:

I write to express my support of the Urban Expansion Area Report ("UEA Report") as written by the Department of Regulatory and Economic Resources ("RER") and request our elected officials to accept and adopt the conclusions of the report that no new Urban Expansion Areas ("UEAs") are warranted at this time as a result of the contractions proposed in the deferred portion of Application No. 5 of the May 2019 CDMP Amendment Cycle.

RER has done a remarkable job in their analysis and conclusions of the UEA Report. The report clearly reflects and adheres to the land use goals, objectives, and policies of our Comprehensive Development Master Plan ("CDMP"). Additionally, the UEA Report concludes similarly to the findings of the Urban Expansion Area Task Force, where I served as the Western Property Owners' Representative. This Task Force met 14 times between August 2017 and May 2018 and after extensive discussion and dialogue, the Task Force recommended the contraction of certain UEAs that were not suitable for development. The Task Force, like RER, concluded there was no need for the creation of new UEAs as a result of contractions to the UEAs.

The UEAs as proposed by RER in the UEA Report will contain 4,725 acres of land, of which "approximately 2,000 acres" are suitable for residential development and approximately 2,850 acres are suitable for non-residential uses. Based on the CDMP, that would allow for more than 20,000 residential units to be built within the revised UEAs. The 20,000 residential units will help address the housing affordability crisis facing our County when the need arises as called for in the CDMP.

Further, agriculture is a vital industry to our County. Given the importance of agriculture to the local economy, there are numerous policies contained in the CDMP to ensure that our County's agricultural communities continue to flourish while protecting and securing our domestic food supply.

In closing, I kindly urge all our elected officials to follow the sound planning analysis of RER and the UEA Task Force in concluding that no new UEAs are warranted at this time and ignore the narrative that is being presented by development industry groups claiming the UEA Report as presented by RER will have an impact on housing affordability and future jobs. The recommended UEAs as proposed by RER can easily accommodate our County's proper and affordable future growth.

Sincerely,

Francisco J. Pines

CC Distribution List:
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Commissioners and Chiefs of Staff @ BOCC-CCS@miamidade.gov
Mr. Jerry Bell @ jerry.bell@miamidade.gov
Ms. Kimberly Brown @ Kimberly.Brown@miamidade.gov
Mr. Charles LaPradd @ Charles.LaPradd@miamidade.gov; lapradd@miamidade.gov;
& agriculture@miamidade.gov

From the Desk of Hon. Katie Edwards-Walpole

April 6, 2021

Ms. Lourdes M. Gomez, Lourdes.Gomez@miamidade.gov
UEA Report Public Comments, UEAStudyComments@miamidade.gov

Thank you for the opportunity to provide comment on the Transmittal of Draft Urban Expansion Area Report. I urge you to adopt the Report. For the reasons articulated herein, I strongly believe that no new Urban Expansion Areas are warranted at this time.

After participating in the December 2019, January 2020 and April 2021 meetings of the Agricultural Practices and Study Advisory Board, it was painfully clear that there was an avoidable war brewing against and among the agricultural industry. I say avoidable because the debate should be focused not on whether or when to move the Urban Development Boundary (UDB) or whether to create a municipality, Redland, outside of the UDB. The time and energy should be focused on local policy changes and County-supported initiatives that have the effect of keeping agriculture profitable. If we keep agriculture profitable, the pressure to sell farmland for development eases tremendously. How do I know this? Look to the largest owners of agricultural land. These are largely generational farmers- not disinterested absentee landowners. These are families who for generations have cultivated the land, grown our food, created jobs, and provided incredible environmental benefits.

Zoning practices outside of the UDB have led to an increase in the number of farms and nurseries. A one-hundred acre vegetable farm sold and converted to development can yield roughly 40 new "farms" under 2.25 acre zoning. These smaller farms can produce everything from tropical fruits, honey, ornamental fish, and plants. The Census of Agriculture confirms that the number of farms under 5 acres has soared, allowing individuals to participate in agriculture, be they as full-time growers or individuals with outside or retirement income whose livelihoods are not dependent upon their farm income. This important delineation between farming as your livelihood and farming as secondary or supplement income ultimately creates a vast divide between philosophies and positions.

There are some who believe that creating a city, Redland, will best protect agriculture as a way of life and preserve the characteristics that make this area attractive to existing and potential residents. Others believe further regulation by an added layer of local government will place undue burden and unnecessary operating expenses on farms and nurseries without providing additional benefits.

The UDB will remain a heated, divisive topic for reasons too numerous to list. At its core, the debate is less about whether there should be a UDB and more about whether and when to modify the UDB.

That takes us to the debate over whether and when. Urban Expansion Areas (UEA) per the County's Comprehensive Development Master Plan (CDMP) are designated areas of land located outside of the UDB that represent areas where further urban development outside of the UDB is warranted some time between the year 2020 and 2030 based on an analysis of available residential supply inside of the UDB. Our County currently has four designated UEA areas. The Miami-Dade County Urban Expansion Area Task Force and Miami-Dade County staff are not recommending

any new UEAs at this time. However, the County has a process in place to designate a new UEA following public involvement and study. Further, the UEA is designated as a place to absorb and control projected growth over time. Decisions to create new UEAs should follow the procedures in place to establish such and should maximize stakeholder involvement from affected landowners.

Policy debates often boil down to reality versus rhetoric. I urge you to focus on the reality presented in the Report rather than the rhetoric that may be well-intentioned but is not a matter for properly before the Commission. To be clear, the decision before the Commission is whether to accept the Report and adopt its recommendations. This is the reality: the County Commission is not voting to incorporate Redland; is not voting to create new UEAs as to do so would violate well-established procedures for the creation of new UEAs; and is not voting to expand the UDB. Any other political fights over matters not squarely before the County Commission at the present time are intended to tear the community apart. That won't help agriculture's profitability and long-term viability.

The existing UEAs will, over time, serve to absorb growth and provide for additional housing units once they have been brought into the UDB only after the County has determined that there is a need to add more land into the UDB to address the housing needs. Per the County's CDMP, the existing UEAs get priority for inclusion into the UDB. After the existing UEAs are put to their intended use, new potential UEA areas can be examined per the County's CDMP. Any future studies for any new UEAs shall take place only after the existing UEAs have depleted their supply or at the very least, only after the existing UEAs become part of the UDB.

In closing, the Commission should accept the Urban Expansion Area Report and provide finality and closure to a years-long public study and participation process. Once that's done, I welcome the opportunity to fully engage with you on how you can help our local farmers and nursery growers of all sizes.



Katie Edwards-Walpole served as Executive Director of the Dade County Farm Bureau from 2002-2010 and was the first woman inducted into Farm Bureau's Hall of Honor. A former State Representative, she has been recognized by numerous organizations for her contributions to Florida Agriculture. Katie remains actively engaged in agricultural and environmental policy matters in South Dade, while she and her husband farm in Okeechobee County.

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Commissioner Garcia @ district13@miamidade.gov & Rene.garcia13@miamidade.gov

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COO, RER, & Agricultural Manager

Mr. Jimmy Morales @ jimmy.morales2@miamidade.gov
Lourdes Gomez @ Lourdes.Gomez@miamidade.gov
Jerry Bell @ jerry.bell@miamidade.gov
Ms. Kimberly Brown @ Kimberly.Brown@miamidade.gov
Mr. Charles LaPradd @ lapradd@miamidade.gov; & agriculture@miamidade.gov

UEAStudyComments@miamidade.gov

Brown, Kimberly (RER)

From: michaelpwanek@gmail.com
Sent: Friday, April 9, 2021 11:26 AM
To: UEA Study Comments (RER)
Subject: RE: urban expansion

To Whom It May Concern:

Urban expansion MUST be closely regulated since agricultural land must be preserved in the areas of South and West Miami-Dade County. Instead of continuing the urban sprawl, high density housing projects should be the solution, but only well within the urban development boundary to the extent possible and never removing land from agricultural use or threatening any protected area. Therefore, our organization, Redland Homes and Farms Association, opposes the use of the 1993 acres of land for further urban development as described by the "Urban Expansion Area Report" dated March 10, 2021.

Best Regards,

Michael Wanek
President Redland Homes and Farms Association
305.726.7688
20520 SW 190th St. Miami, FL 33187



Brown, Kimberly (RER)

From: Jeanne Rothchild <jmrothchild9446@gmail.com>
Sent: Saturday, April 10, 2021 7:19 AM
To: UEA Study Comments (RER)
Subject: Comments on Draft UEA Report

Dear Director Jerry Bell,

I am writing to comment on the Miami-Dade County Department of Regulatory and Economic Resources Draft Urban Expansion Area (UEA) Report in response to the Board of County Commissioners' adoption of Policy LU-8J into the Comprehensive Development Master Plan (CDMP) last year. The policy directs completion of a study addressing the following:

- Additional areas that may be identified as urban expansion areas, with a goal of replacing the 1,993 acres that were proposed for removal in Application No. 5 of the Evaluation and Appraisal Report Amendments in the May 2019 CDMP Amendment Cycle, and

- Potential additional uses that would be appropriate for the Urban Expansion Areas, particularly near the Homestead Air Reserve Base.

No developable land was actually lost from the proposed contractions in the May 2019 CDMP Amendment Cycle, so there should be no need to recoup acreage for reductions unless no other alternative exists. At this time we do have other alternatives, please pursue those and keep our current boundaries in place and focus our tax dollars on infrastructure investments we so desperately need.
The proposed UEAs conflict with future projects for the Comprehensive Everglades Restoration Plan (CERP) and they would lead to further degradation and loss of farmlands and wetlands in unincorporated Miami-Dade County. Given what we are facing we should be in a NO NET LOSS OF GREENSPACE MODE as a county.

As the study points out, there are 4,660 available acres total and an additional 2,000 acres for accommodating future residential growth within the Urban Development Boundary (UDB) that would allow for development beyond 2040. If there is no sensible or verifiable need to utilize the current UEAs, then the County should rely on the available acreage that exists inside the UDB and existing UEAs 1-4 and not expand them at this time.

If and when there is a demonstrable need to add acreage and create a new UEA, this would be best located in an area closest to existing infrastructure. Study Area (3a) would allow residents to utilize public transportation, whereas Study Area (1a) would not. We are opposed to Study Area (1a) as its footprint would conflict with projects for CERP and with mining operations in the Northern Lake Belt.

Thank you for your departments' excellent work on this report, and I hope you will take my comments into consideration when moving forward with your final report and your recommendations to the Commission.

Sincerely,

Jeanne Rothchild
6711 N Kendall Dr., Apt 509
Pinecrest, FL 33156

Brown, Kimberly (RER)

From: skobola (Y Mail) <skobola@yahoo.com>
Sent: Sunday, April 11, 2021 11:55 AM
To: Miami-Dade County
Cc: UEA Study Comments (RER)
Subject: Re: Miami-Dade County Weekly News & Provide comments on County's draft Urban Expansion Area Report

I believe that you should provide the description of the area that the picture shows, which is on the web page Provide comments on County's draft Urban Expansion Area Report (miamidade.gov) = https://www.miamidade.gov/global/news-item.page?Mduid_news=news1615993637790 54.
In other words, it should show a description of the approximate area it shows, like from SW 280 Street to SW 290 St, SW 127 Ave to SW 137 Ave.
In general, I believe that more information that you provide is/will be better.
Thank you.
Regards,
S. Kobola

On Friday, April 9, 2021, 04:31:01 PM EDT, Miami-Dade County <gov@info.miamidade.gov> wrote:

Ap



dults eligible for the COVID-19 vaccine

Brown, Kimberly (RER)

From: Nelson Gonzalez <nelsongonzalez_00@hotmail.com>
Sent: Monday, April 12, 2021 10:09 AM
To: UEA Study Comments (RER)
Cc: Bracy, Bobby (DIST8); Abreu, Jorge (DIST9)
Subject: Urban expansion

To Whom It May Concern:

Urban expansion MUST be closely regulated since agricultural land must be preserved in the areas of South and West Miami-Dade County. Instead of continuing the urban sprawl, high density housing projects should be the solution, but only well within the urban development boundary to the extent possible and never removing land from agricultural use or threatening any protected area. Therefore, oppose the use of the 1993 acres of land for further urban development as described by the "Urban Expansion Area Report" dated March 10, 2021.

Best Regards,
Nelson Gonzalez
20605 SW 184th ST
Miami, FL 33187

Tropical Fruit Growers of South Florida, Inc.
18710 S.W. 288 Street, Homestead, FL 33030 Telephone: 305-401-1502 Fax: 305-246-2932
Website: tropicalfruitgrowers.com Email: tropicalfruitgrowers@gmail.com

Kimberly Brown, AICP, Supervisor
Long-Range Planning Section, Planning Division
Regulatory and Economic Resources Department
Miami-Dade County

Via Email Attachment 13 April 2021

Dear Kim,

This note is in response to the 10 March 2021 draft of the Urban Expansion Area (UEA) Report prepared by you and your colleagues pursuant to CDMP Policy LU-8J.

First of all, congratulations on preparing such a clear and thoroughly and thoughtfully researched and well-analyzed document. It is one of the best, perhaps the very best, item of its kind that has been produced by County Staff.

Our organization was represented (by Steven Green) at the many UEA task force meetings as one of the stakeholders in the County appointed by Mayor Carlos Gimenez. We also note that a number of development/builders groups were also represented at those meetings and they concurred with its final report that the UEAs should remain protected and not be opened for development. Those meetings were well attended, all participants put in many hours of preparation and attendance, all those wishing to speak were heard, County staff did an excellent job preparing materials for review, and it was overall a good example of collaboration in making a recommendation regarding an important land use planning issue.

It is disturbing that the builders are now attempting to subvert the report to which they were a party and are doing so via 'backdoor' lobbying County Commissioners rather than having made their representations to the task force for consideration.

The original task force report is consistent with our position that all new residential and other developments should only be within the urban development boundary, should never remove land from agricultural use, should not threaten any area designated for protection of forests and of endangered habitats or biota, and should not adversely impact our water supply or our coastal marine environments.

The Board of Directors of the Tropical Fruit Growers of South Florida, Inc., have authorized us to inform you that we are in complete agreement with and are in full support of all the recommendations outlined in Chapter 4 of your Draft Report.

Sincerely,

Matthew Porter

Matthew Porter, President

Steven Green, Ph.D., past President, member of the Board of Directors, and representative to the UEA Task Force.

Brown, Kimberly (RER)

From: Peter Ehrlich <petersobe@aol.com>
Sent: Tuesday, April 13, 2021 1:35 PM
To: UEA Study Comments (RER)
Subject: Hold the Line

Please Hold the Line. Please oppose and vote against any schemes to invade the Everglades.

Thank you,

Peter R. Ehrlich, Jr.
President

Urban Environment League

Scenic Miami
Friends of Indian Hill Park
Urban Environment League
Virginia Key Advisory Board

Please excuse spelling and/or grammar errors.

Brown, Kimberly (RER)

From: Dewey Steele <outlook_377D1AA8DBB9D544@outlook.com>
Sent: Tuesday, April 13, 2021 4:37 PM
To: UEA Study Comments (RER)
Subject: UEA Study Report

I would like to comment on this report.

The planning staff has done an excellent job putting this one together. The report clearly shows the layout of the county and points out that the rapid movement of the UDB would be pre mature.

The county leaders need to be aware that open land, protection of our waters and the Bay, The Everglades and agriculture should take priority over moving the UDB. Expanding industrial and commercial areas should be limited to those parcels inside the UDB.

Let's preserve our quality of life by smart planning and resisting the pressure to develop and pave over the remaining lands in Miami Dade County.

Thanks,

Dewey E. Steele

Sent from Mail for Windows 10

TROPICAL AUDUBON SOCIETY

Jerry Bell
Assistant Director for Planning
Department of Regulatory and Economic Resources
Miami-Dade County

April 13, 2021

Dear Director Bell,

The Tropical Audubon Society appreciates the opportunity to provide comments on your Department's excellent draft Urban Expansion Area (UEA) report. We particularly appreciate the clarity and analysis on the various issues. We similarly appreciate the discussion on role of Miami-Dade County's Comprehensive Development Master Plan (CDMP) as the key planning tool to achieve responsible growth while protecting the iconic natural areas that define our county. Tropical Audubon has long supported the CDMP and its included Urban Development Boundary (UDB) as vital tools that have protected the excellent quality of life in our county for over 35 years.

We have three broad comments, followed by a few specific suggestions for improving the document. First, we appreciate, support and agree with the conclusion in the report that no additional UEA's be designated at this time. The report correctly concludes that there is sufficient residential and industrial development capacity within the UDB to accommodate projected population growth thru 2040, far beyond the county's short and long-term planning horizons. The report also notes that there currently exists sizable capacity within the existing UEAs for industrial and residential development.

Second, the Draft Report's conclusions are important as the County proceeds to implement the recommendations of the recently completed Biscayne Bay Task Force. Seeking to restore and protect Biscayne Bay as the county's premier natural treasure, the Task force recommended and the County Commission adopted several recommendations to achieve those goals. One of those key recommendations is to: "Elevate and further amend the Comprehensive Develop Master Plan (CDMP) to further include Biscayne Bay watershed management planning elements". These future plans to improve the health of Biscayne Bay will require the spatial extent to accommodate these watershed improvements. Equally important is the parallel responsibility to protect vital lands that are part of the Comprehensive Everglades Restoration Plan. Our current UDB protects these vital lands and the report correctly concludes that the UDB need not and should not be expanded.

Third, we appreciate and agree with the report's focus on protecting agricultural production and its continued economic viability in Miami-Dade County—a major objective of the UDB. In particular, the report notes that the threshold for a viable agricultural industry in the county is 52,000 acres. It cites the loss of over 3,000 acres during the past decade, leaving the county with only 53,000 acres of land designated for exclusive agricultural use. The report concludes that here is no need to expand the UDB, also noting that there are still over 2,000 acres of land existing within the remaining UEAs in the CDMP. Based on these factors, the report recommends that the county retract the 1993 acres proposed in Application 5 and not expand the UEA's at this time. We agree with this recommendation.

Tropical Audubon Society | 5530 Sunset Drive Miami, FL 33143 | (305) 667-7337 | www.tropicalaudubon.org

To conclude, we have a few concerns and suggestions:

First, we note that UEA Study Area 1a overlaps the Everglades Restoration's Lakebelt component and we urge that you remove that area from consideration as a new Urban Expansion Area. These lands, and other lands needed for the restoration effort in the CERP. should not be considered for future development at this time. As noted above, these expansion areas are not necessary now and we believe that there are more viable areas for consideration of future expansion.

Second, we highlight the special needs of the mangrove fringe and wetlands that abut Biscayne Bay. We cannot provide the necessary protection for Biscayne Bay by simply providing a thin strip of natural lands adjacent to the bay. With planning already underway for addressing and protecting these vital resources, the CDMP needs to ensure that the necessary buffer lands remain in agriculture production as part of the Biscayne Bay restoration planning. We also note that these buffer lands will become important protections in the face of sea-level rise, especially in the vulnerable flood-prone areas in Southern Dade County.

Finally, we cannot ignore the recent applications to expand the UDB in the vicinity of the Homestead Air Reserve Base. These proposed changes would convert Agricultural lands to urban development in areas that seriously challenge many of the policy priorities described throughout this report. Although these recent applications are not part of your report, these new applications present a new urgency to the issues.

All the best,



Paola Ferreira Miani

Executive Director

cc. Daniela Levine Cava – Mayor Miami-Dade County

Irela Bague – Chief Bay Officer

Sean McCrakine – Director of Policy for Mayor Levine Cava

Commissioner Oliver Gilbert III; Commissioner Jean Monestime; Commissioner Keon Hardemon; Commissioner Sally Heyman; Commissioner Eileen Higgins; Commissioner Rebecca Sosa; Commissioner Raquel Regalado; Commissioner Danielle Cohen Higgins; Commissioner Keone McGhee; Commissioner D. Souto; Commissioner Joe A. Martinez, Commissioner Pepe Diaz, Commissioner Rene Garcia.

Tropical Audubon Society | 5530 Sunset Drive Miami, FL 33143 | (305) 667-7337 | www.tropicalaudubon.org

Brown, Kimberly (RER)

From: Peggy Machin <rosegarden678@gmail.com>
Sent: Tuesday, April 13, 2021 7:19 PM
To: UEA Study Comments (RER)
Subject: UEA

Director Jerry Bell,

I am writing to comment on the Miami-Dade County Department of Regulatory and Economic Resources Draft Urban Expansion Area (UEA) Report in response to the Board of County Commissioners' adoption of Policy LU-8J into the Comprehensive Development Master Plan (CDMP) last year. The policy directs completion of a study addressing the following:

- Additional areas that may be identified as urban expansion areas, with a goal of replacing the 1,993 acres that were proposed for removal in Application No. 5 of the Evaluation and Appraisal Report Amendments in the May 2019 CDMP Amendment Cycle, and
- Potential additional uses that would be appropriate for the Urban Expansion Areas, particularly near the Homestead Air Reserve Base.

No developable land was actually lost from the proposed contractions in the May 2019 CDMP Amendment Cycle, so there should be no need to recoup acreage for reductions unless no other alternative exists. At this time we do have other alternatives, please pursue those and keep our current boundaries in place and focus our tax dollars on infrastructure investments we so desperately need.

The proposed UEAs conflict with future projects for the Comprehensive Everglades Restoration Plan (CERP) and they would lead to further degradation and loss of farmlands and wetlands in unincorporated Miami-Dade County. Given what we are facing we should be in a NO NET LOSS OF GREENSPACE MODE as a county.

As the study points out, there are 4,660 available acres total and an additional 2,000 acres for accommodating future residential growth within the Urban Development Boundary (UDB) that would allow for development beyond 2040. If there is no sensible or verifiable need to utilize the current UEAs, then the County should rely on the available acreage that exists inside the UDB and existing UEAs 1-4
and not expand them at this time.

If and when there is a demonstrable need to add acreage and create a new UEA, this would be best located in an area closest to existing infrastructure. Study Area (3a) would allow residents to utilize public transportation, whereas Study Area (1a) would not. We are opposed to Study Area (1a) as its footprint would conflict with projects for CERP and with mining operations in the Northern Lake Belt.

Thank you for your departments excellent work on this report, and I hope you will take my comments into consideration when moving forward with your final report and your recommendations to the Commission.

Sincerely,

Peggy Machin
786-267-1017

Brown, Kimberly (RER)

From: cat100@tac123.com
Sent: Wednesday, April 14, 2021 10:16 AM
To: UEA Study Comments (RER)
Subject: RE: DRAFT UEA STUDY COMMENTS

Dear Director Jerry Bell,

I am writing to comment on the Miami-Dade County Department of Regulatory and Economic Resources Draft Urban Expansion Area (UEA) Report in response to the Board of County Commissioners' adoption of Policy LU-8J into the Comprehensive Development Master Plan
(CDMP) last year. The policy directs completion of a study addressing the following:

- Additional areas that may be identified as urban expansion areas, with a goal of replacing the 1,993 acres that were proposed for removal in Application No. 5 of the Evaluation and Appraisal Report Amendments in the May 2019 CDMP Amendment Cycle, and
- Potential additional uses that would be appropriate for the Urban Expansion Areas, particularly near the Homestead Air Reserve Base.

No developable land was actually lost from the proposed contractions in the May 2019 CDMP Amendment Cycle, so there should be no need to recoup acreage for reductions unless no other alternative exists. At this time we do have other alternatives, please pursue those and keep our current boundaries in place and focus our tax dollars on infrastructure investments we so desperately need.

The proposed UEAs conflict with future projects for the Comprehensive Everglades Restoration Plan (CERP) and they would lead to further degradation and loss of farmlands and wetlands in unincorporated Miami-Dade County. Given what we are facing we should be in a NO NET LOSS OF GREENSPACE MODE as a county.

As the study points out, there are 4,660 available acres total and an additional 2,000 acres for accommodating future residential growth within the Urban Development Boundary (UDB) that would allow for development beyond 2040. If there is no sensible or verifiable need to utilize the current UEAs, then the County should rely on the available acreage that exists inside the UDB and existing UEAs 1-4 and not expand them at this time.

If and when there is a demonstrable need to add acreage and create a new UEA, this would be best located in an area closest to existing infrastructure. Study Area (3a) would allow residents to utilize public transportation, whereas Study Area (1a) would not. We are opposed to Study Area
(1a) as its footprint would conflict with projects for CERP and with mining operations in the Northern Lake Belt.

Thank you for your departments excellent work on this report, and I hope you will take my comments into consideration when moving forward with your final report and your recommendations to the Commission.

Sincerely,

Turner Cathey
8631 NW 4 Ter, Apt 7
Miami, FL 33126

For the message of the cross is foolishness to those who are perishing, but to us who are being saved it is the power of God. 1 Cor. 1:18

Brown, Kimberly (RER)

From: Alan Thomas <alandottwo@aol.com>
Sent: Wednesday, April 14, 2021 10:20 AM
To: UEA Study Comments (RER)
Subject: Development plans

Please keep the current boundaries in place. Our wetlands are already stressed enough !
Sincerely,
Alan Thomas

Brown, Kimberly (RER)

From: Barbara Delgado <delgado_barbara@yahoo.com>
Sent: Wednesday, April 14, 2021 10:25 AM
To: UEA Study Comments (RER)
Subject: comments on Draft UEA Report

Director Bell,

As a lifelong resident of Miami-Dade County, I am writing to comment on the Draft UEA Report in which Miami-Dade County is considering increasing density in an area that is currently outside the Urban Development Boundary (UDB).

I am strongly opposed to this proposal. This will undoubtedly lead to increased development, traffic, and loss of natural areas in South Florida. It will jeopardize the ongoing efforts to restore the ecological health of Biscayne Bay and exacerbate the risks of salt-water intrusion in South Dade. The proposal is unnecessary as there are 2,660 acres of developable industrial land within the current UDB. We should be looking into protecting more land, not looking for ways to decrease protection.

No developable land was actually lost from the proposed contractions in the May 2019 CDMP Amendment Cycle, so there should be no need to recoup acreage for reductions unless no other alternative exists. At this time, we do have other alternatives. I urge you to pursue those and keep our current boundaries in place and focus our tax dollars on infrastructure investments we so desperately need.

Additionally, the proposed UEAs conflict with future projects for the Comprehensive Everglades Restoration Plan (CERP) and they would lead to further degradation and loss of farmlands and wetlands in unincorporated Miami-Dade County. The restoration of our Everglades is extremely important, and nothing should be done to jeopardize this.

I do hope you will take my comments into consideration when moving forward with your final report and your recommendations to the Commission.

Respectfully yours,

Barbara Delgado

Brown, Kimberly (RER)

From: Philip Stoddard <pkstoddard@gmail.com>
Sent: Wednesday, April 14, 2021 10:40 AM
To: UEA Study Comments (RER)
Subject: Draft UEA Report

I write to oppose creation of new UEAs, particularly those that could conflict with CERP and limestone extraction in the lake belt. As the RER Draft Urban Expansion Area (UEA) Report notes, within the UDB and the existing UEAs 1-4, the County currently has 4660 acres available for development, of which almost half is suitable for residential construction. We have no pressing need for expansion outside these areas.

regards,

Philip K. Stoddard
6820 SW 64 CT
South Miami FL 33143-3209
305-342-0161 m

April 15, 2021

Via e-mail: UEAStudyComments@miamidade.gov

RE: DRAFT UEA STUDY COMMENTS

To Director Jerry Bell,

I am writing to comment on the Miami-Dade County Department of Regulatory and Economic Resources Draft Urban Expansion Area (UEA) Report in response to the Board of County Commissioners' adoption of Policy LU-8J into the Comprehensive Development Master Plan (CDMP) last year. The policy directs completion of a study addressing the following:

- Additional areas that may be identified as urban expansion areas, with a goal of replacing the 1,993 acres that were proposed for removal in Application No. 5 of the Evaluation and Appraisal Report Amendments in the May 2019 CDMP Amendment Cycle, and
- Potential additional uses that would be appropriate for the Urban Expansion Areas, particularly near the Homestead Air Reserve Base.

No developable land was actually lost from the proposed contractions in the May 2019 CDMP Amendment Cycle, so there should be no need to recoup acreage for reductions unless no other alternative exists. At this time we do have other alternatives, please pursue those and keep our current boundaries in place and focus our tax dollars on infrastructure investments we so desperately need.

The proposed UEAs conflict with future projects for the Comprehensive Everglades Restoration Plan (CERP) and they would lead to further degradation and loss of farmlands and wetlands in unincorporated Miami-Dade County. Given what we are facing we should be in a NO NET LOSS OF GREENSPACE MODE as a county.

As the study points out, there are 4,660 available acres total and an additional 2,000 acres for accommodating future residential growth within the Urban Development Boundary (UDB) that would allow for development beyond 2040. If there is no sensible or verifiable need to utilize the current UEAs, then the County should rely on the available acreage that exists inside the UDB and existing UEAs 1-4 and not expand them at this time.

If and when there is a demonstrable need to add acreage and create a new UEA, this would be best located in an area closest to existing infrastructure. Study Area (3a) would allow residents to utilize public transportation, whereas Study Area (1a) would not. We are opposed to Study Area (1a) as its footprint would conflict with projects for CERP and with mining operations in the Northern Lake Belt.

Thank you for your departments excellent work on this report, and I hope you will take my comments into consideration when moving forward with your final report and your recommendations to the Commission.

Sincerely,

Guadalupe García
14912 SW 74 Pl
Palmetto Bay FL 33158

Brown, Kimberly (RER)

From: mybarr38@aol.com
Sent: Wednesday, April 14, 2021 12:14 PM
To: UEA Study Comments (RER)
Subject: The Everglades Need Your Help

To Director Jerry Bell,

I am writing to comment on the Miami-Dade County Department of Regulatory and Economic
Resources Draft Urban Expansion Area (UEA) Report in response to the Board of County
Commissioners' adoption of Policy LU-8J into the Comprehensive Development Master Plan
(CDMP) last year. The policy directs completion of a study addressing the following:

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- Potential additional uses that would be appropriate for the Urban Expansion Areas, particularly near the Homestead Air Reserve Base.

No developable land was actually lost from the proposed contractions in the May 2019 CDMP
Amendment Cycle, so t**here should be no need to recoup acreage for reductions unless no other alternative exists. At this time we do have other alternatives, please pursue those and keep our current boundaries in place and focus our tax dollars on infrastructure investments we so desperately need.**

Thank you.

Sincerely,

Mylene Barrientos
8940 SW 68th Court, # G5
Pinecrest, FL 33156

Brown, Kimberly (RER)

From: jeffrey christo <jeffreychristo@yahoo.com>
Sent: Wednesday, April 14, 2021 12:48 PM
To: UEA Study Comments (RER)
Subject: UDB Increase

To Whom It May Concern,

I thank you for reading my comments on the subject of increasing the UDB area for development. Continuing to increase development little business little in protected areas that directly affect the ecosystem is not sustainable for any of us. Without these protected areas we will continue to see the quality of our economic as well as natural growth and quality of life decline. I ask that you do not allow any increase to the UDB for the profit of a small few, and cause irreparable harm to the majority.

Respectfully,

Jeffrey P Christo
Voter in Miami Dade

Sent from my iPhone

Brown, Kimberly (RER)

From: Lynn Forsht <lforsht@gmail.com>
Sent: Wednesday, April 14, 2021 1:13 PM
To: UEA Study Comments (RER)
Subject: DRAFT UEA STUDY COMMENTS

To Director Jerry Bell,

I am commenting on the Miami-Dade County Department of Regulatory and Economic Resources Draft Urban Expansion Area (UEA) Report in response to the Board of County Commissioners' adoption of Policy LU-8J into the Comprehensive Development Master Plan (CDMP) last year. The policy directs completion of a study addressing the following:

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The proposed UEAs conflict with future projects for the Comprehensive Everglades Restoration Plan (CERP) and they would lead to further degradation and loss of farmlands and wetlands in unincorporated Miami-Dade County. Given what we are facing we should be in a NO NET LOSS OF GREENSPACE MODE as a county.

As the study points out, there are 4,660 available acres total and an additional 2,000 acres for accommodating future residential growth within the Urban Development Boundary (UDB) that would allow for development beyond 2040. If there is no sensible or verifiable need to utilize the current UEAs, then the County should rely on the available acreage that exists inside the UDB and existing UEAs 1-4
and not expand them at this time.

If and when there is a demonstrable need to add acreage and create a new UEA, this would be best located in an area closest to existing infrastructure. Study Area (3a) would allow residents to utilize public transportation, whereas Study Area (1a) would not. We are opposed to Study Area (1a) as its footprint would conflict with projects for CERP and with mining operations in the Northern Lake Belt.

Thank you for your departments excellent work on this report, and I hope you will take my comments into consideration when moving forward with your final report and your recommendations to the Commission.

Sincerely,
Lynn Forsht
17895 SW 272 Street
Homestead, FL 33031-2218

Brown, Kimberly (RER)

From: Jhrma <jhrma@aol.com>
Sent: Wednesday, April 14, 2021 2:05 PM
To: UEA Study Comments (RER)
Subject: Draft Urban Expansion Area

RE: DRAFT UEA STUDY COMMENTS

To Director Jerry Bell,

I am writing to comment on the Miami-Dade County Department of Regulatory and Economic Resources Draft Urban Expansion Area (UEA) Report in response to the Board of County Commissioners' adoption of Policy LU-8J into the Comprehensive Development Master Plan (CDMP) last year. The policy directs completion of a study addressing the following:

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and not expand them at this time.

If and when there is a demonstrable need to add acreage and create a new UEA, this would be best located in an area closest to existing infrastructure. Study Area (3a) would allow residents to utilize public transportation, whereas Study Area (1a) would not. We are opposed to Study Area (1a) as its footprint would conflict with projects for CERP and with mining operations in the Northern Lake Belt.

Thank you for your departments excellent work on this report, and I hope you will take my comments into consideration when moving forward with your final report and your recommendations to the Commission.
Richard M Acosta

Brown, Kimberly (RER)

From: santacruz305@aol.com
Sent: Wednesday, April 14, 2021 3:44 PM
To: UEA Study Comments (RER)
Subject: Have Empathy

April 15, 2021

Via e-mail: UEAStudyComments@miamidade.gov

RE: DRAFT UEA STUDY COMMENTS

To Director Jerry Bell,

I am writing to comment on the Miami-Dade County Department of Regulatory and Economic Resources Draft Urban Expansion Area (UEA) Report in response to the Board of County Commissioners' adoption of Policy LU-8J into the Comprehensive Development Master Plan (CDMP) last year. The policy directs completion of a study addressing the following:

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No developable land was actually lost from the proposed contractions in the May 2019 CDMP Amendment Cycle, so there should be no need to recoup acreage for reductions unless no other alternative exists. At this time we do have other alternatives, please pursue those and keep our current boundaries in place and focus our tax dollars on infrastructure investments we so desperately need.

The proposed UEAs conflict with future projects for the Comprehensive Everglades Restoration Plan (CERP) and they would lead to further degradation and loss of farmlands and wetlands in unincorporated Miami-Dade County. Given what we are facing we should be in a NO NET LOSS OF GREENSPACE MODE as a county.

As the study points out, there are 4,660 available acres total and an additional 2,000 acres for accommodating future residential growth within the Urban Development Boundary (UDB) that would allow for development beyond 2040. If there is no sensible or verifiable need to utilize the current UEAs, then the County should rely on the available acreage that exists inside the UDB and existing UEAs 1-4
and not expand them at this time.

If and when there is a demonstrable need to add acreage and create a new UEA, this would be best located in an area closest to existing infrastructure. Study Area (3a) would allow residents to utilize public transportation, whereas Study Area (1a) would not. We are opposed to Study Area (1a) as its footprint would conflict with projects for CERP and with mining operations in the Northern Lake Belt.

Thank you for your departments excellent work on this report, and I hope you will take my comments into consideration when moving forward with your final report and your recommendations to the Commission.

Sincerely, S. Arguello

Brown, Kimberly (RER)

From: isa bird <message4isa@gmail.com>
Sent: Wednesday, April 14, 2021 7:08 PM
To: UEA Study Comments (RER)
Subject: UEA STUDY COMMENTS

To Director Jerry Bell,

I reaching out with the intent to express my comments on the **Miami-Dade County Department of Regulatory and Economic Resources Draft Urban Expansion Area (UEA) Report** in response to the Board of County Commissioners' adoption of Policy LU-8J into the Comprehensive Development Master Plan CDMP) last year. The policy directs completion of a study addressing the following:

- Additional areas that may be identified as urban expansion areas, with a goal of replacing the 1,993 acres that were proposed for removal in Application No. 5 of the Evaluation and Appraisal Report Amendments in the May 2019 CDMP Amendment Cycle, and
- Potential additional uses that would be appropriate for the Urban Expansion Areas, particularly near the Homestead Air Reserve Base.

No developable land was actually lost from the proposed contractions in the May 2019 CDMP Amendment Cycle, so there should be no need to recoup acreage for reductions unless no other alternative exists.

At this time we do have other alternatives, please pursue those and keep our current boundaries in place and focus our tax dollars on infrastructure investments we so desperately need.

The proposed UEAs conflict with future projects for the Comprehensive Everglades Restoration Plan (CERP) and they would lead to further degradation and loss of farmlands and wetlands in unincorporated Miami-Dade County.

Given what we are facing we should be in a NO NET LOSS OF GREENSPACE MODE as a county.

As the study points out, there are 4,660 available acres total and an additional 2,000 acres for accommodating future residential growth within the Urban Development Boundary (UDB) that would allow for development beyond 2040. If there is no sensible or verifiable need to utilize the current UEAs, then the County should rely on the available acreage that exists inside the UDB and existing UEAs 1-4
and not expand them at this time.

If and when there is a demonstrable need to add acreage and create a new UEA, this would be best located in an area closest to existing infrastructure. Study Area (3a) would allow residents to utilize public transportation, whereas Study Area (1a) would not. We are opposed to Study Area (1a) as its footprint would conflict with projects for CERP and with mining operations in the Northern Lake Belt.

Thank you for your departments excellent work on this report, and I hope you will take my comments into consideration when moving forward with your final report and your recommendations to the Commission.

Sincerely,

isa zuluaga
2350 NE 135th st apt 1512

north miami, fl 33181

Brown, Kimberly (RER)

From: Norma Restrepo <12noser@comcast.net>
Sent: Wednesday, April 14, 2021 7:13 PM
To: UEA Study Comments (RER)
Subject: RE: DRAFT UEA STUDY COMMENTS

April 15, 2021

To Director Jerry Bell,

I am writing to comment on the Miami-Dade County Department of Regulatory and Economic Resources Draft Urban Expansion Area (UEA) Report in response to the Board of County Commissioners' adoption of Policy LU-8J into the Comprehensive Development Master Plan (CDMP) last year. The policy directs completion of a study addressing the following:

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- Potential additional uses that would be appropriate for the Urban Expansion Areas, particularly near the Homestead Air Reserve Base.

No developable land was lost from the proposed contractions in the May 2019 CDMP Amendment Cycle, so there should be no need to recoup acreage for reductions unless no other alternative exists. Currently, we do have other alternatives, please pursue those, and keep our current boundaries in place and focus our tax dollars on infrastructure investments we so desperately need.

The proposed UEAs conflict with future projects for the Comprehensive Everglades Restoration Plan (CERP) and they would lead to further degradation and loss of farmlands and wetlands in unincorporated Miami-Dade County. Given what we are facing we should be in a NO NET LOSS OF GREENSPACE MODE as a county.

As the study points out, there are 4,660 available acres total and an additional 2,000 acres for accommodating future residential growth within the Urban Development Boundary (UDB) that would allow for development beyond 2040. If there is no sensible or verifiable need to utilize the current UEAs, then the County should rely on the available acreage that exists inside the UDB and existing UEAs 1-4 and not expand them currently.

If there is a demonstrable need to add acreage and create a new UEA, this would be best located in an area closest to existing infrastructure. Study Area (3a) would allow residents to utilize public transportation, whereas Study Area (1a) would not. We are opposed to Study Area (1a) as its footprint would conflict with projects for CERP and with mining operations in the Northern Lake Belt.

Thank you for your department's excellent work on this report, and I hope you will take my comments into consideration when moving forward with your final report and your recommendations to the Commission.

Sincerely,

Norma Eugenia Restrepo

22945 SW 122 Place

Miami-Florida 33170

Brown, Kimberly (RER)

From: Monica Woll <monicamcmanus@yahoo.com>
Sent: Wednesday, April 14, 2021 7:57 PM
To: UEA Study Comments (RER)
Subject: Everglades preservation

I am writing against any further building at the Everglades boundary. This fragile ecosystem is home to many animals and plants and is also the water source for Miami and the Florida Keys, where I live. Please stop pretending that we can continue to encroach on this wetland of critical importance without serious consequences!

Monica Woll
Tavernier FL 33070

Sent from my iPhone

Brown, Kimberly (RER)

From: Natalie Alatriste <natalie.alatriste@gmail.com>
Sent: Wednesday, April 14, 2021 9:23 PM
To: UEA Study Comments (RER)
Subject: DRAFT UEA STUDY COMMENTS

Director Jerry Bell:

I am writing to comment on the Miami-Dade County Department of Regulatory and Economic Resources Draft Urban Expansion Area (UEA) Report in response to the Board of County Commissioners' adoption of Policy LU-8J into the Comprehensive Development Master Plan (CDMP) last year.

The policy directs completion of a study addressing the following:

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- Potential additional uses that would be appropriate for the Urban Expansion Areas, particularly near the Homestead Air Reserve Base.

No developable land was actually lost from the proposed contractions in the May 2019 CDMP Amendment Cycle, so there should be no need to recoup acreage for reductions unless no other alternative exists.

At this time, we do have other alternatives. Please pursue those and keep our current boundaries in place and focus our tax dollars on infrastructure investments we so desperately need.

The proposed UEAs conflict with future projects for the Comprehensive Everglades Restoration Plan (CERP) and they would lead to further degradation and loss of farmlands and wetlands in unincorporated Miami-Dade County. Given what we are facing, we should be in a no net loss of greenspace mode as a county.

As the study points out, there are 4,660 available acres total and an additional 2,000 acres for accommodating future residential growth within the Urban Development Boundary (UDB) that would allow for development beyond 2040. If there is no sensible or verifiable need to utilize the current UEAs, then the County should rely on the available acreage that exists inside the UDB and existing UEAs 1-4 and not expand them at this time.

If and when there is a demonstrable need to add acreage and create a new UEA, this would be best located in an area closest to existing infrastructure. Study Area (3a) would allow residents to utilize public transportation, whereas Study Area (1a) would not. We are opposed to Study Area (1a) as its footprint would conflict with projects for CERP and with mining operations in the
Northern Lake Belt.

Thank you for your department's excellent work on this report, and I hope you will take my comments into consideration when moving forward with your final report and your recommendations to the Commission.

I appreciate your time.

Regards,
Natalie Alatriste

COMMUNICATIONS PROFESSIONAL

ENVIRONMENTAL CHAIR,
LEAGUE OF WOMEN VOTERS MIAMI-DADE COUNTY
305-801-8775

Brown, Kimberly (RER)

From: Louise King <royalgrove@att.net>
Sent: Wednesday, April 14, 2021 9:36 PM
To: UEA Study Comments (RER)
Subject: UEA Report

To whom it may concern,

I am a resident of the Redland area and a tropical fruit grower.

I am in full support of the UEA Report as written.

Thank you,

Louise King
21910 SW 250 St.
Homestead, FL 33031

Brown, Kimberly (RER)

From: Barbara Overton <boverton@gmail.com>
Sent: Thursday, April 15, 2021 7:09 AM
To: UEA Study Comments (RER)
Subject: Don't expand the UAE

To Director Jerry Bell,

I appreciate it is tough to balance development and environmental protection. I am writing to comment on the Miami-Dade County Department of Regulatory and Economic Resources Draft Urban Expansion Area (UEA) Report in response to the Board of County Commissioners' adoption of Policy LU-8J into the Comprehensive Development Master Plan (CDMP) last year.

Given that no developable land was actually lost from the proposed contractions in the May 2019 CDMP Amendment Cycle, so there should be no need to recoup acreage for reductions unless no other alternative exists. At this time we do have other alternatives, please pursue those and keep our current boundaries in place and focus our tax dollars on infrastructure investments we so desperately need.

We need to protect our green space! The proposed UEAs conflict with future projects for the Comprehensive Everglades Restoration
Plan (CERP) and they would lead to further degradation and loss of farmlands and wetlands in unincorporated Miami-Dade County.

I hope you will take my comments into consideration when moving forward with your final report and your recommendations to the
Commission.

Barbara Overton
Coral Gables
Sent from Mail for Windows 10

Brown, Kimberly (RER)

From: Camila Quaresma-Sharp <camila@sharpdentistry.com>
Sent: Thursday, April 15, 2021 10:21 AM
To: UEA Study Comments (RER)
Subject: DRAFT UEA STUDY COMMENTS

To Director Jerry Bell,

Please, consider my comment on the Miami-Dade County Department of Regulatory and Economic Resources Draft Urban Expansion Area (UEA) Report in response to the Board of County Commissioners' adoption of Policy LU-8J into the Comprehensive Development Master Plan (CDMP) last year. The policy directs completion of a study addressing the following:

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● Potential additional uses that would be appropriate for the Urban Expansion Areas, particularly near the Homestead Air Reserve Base.

Please pursue other alternatives available and keep our current boundaries in place while focusing our tax dollars on infrastructure investments we so desperately need.

The proposed UEAs conflict with future projects for the Comprehensive Everglades Restoration Plan (CERP) and they would lead to further degradation and loss of farmlands and wetlands in unincorporated Miami-Dade County. We cannot afford any NET LOSS OF GREENSPACE MODE as a county, specially when the latest study points out, there are 4,660 available acres total and an additional 2,000 acres for accommodating future residential growth within the Urban Development Boundary (UDB) that would allow for development beyond 2040. The County should rely on the available acreage that exists inside the UDB and existing UEAs 1-4 and not expand them at this time.

Thank you for considering my comments.

Best regards,

CAMILA QUARESMA-SHARP

**Sharp Dentistry
Director of Business Development
Office (305) 857-0990
camila@sharpdentistry.com
www.sharpdentistry.com

**Coconut Grove Chamber of Commerce
BOD and Chair of Sustainability & Resilience Committee
https://www.coconutgrovechamber.com

**Friends of the Everglades
BOD
http://www.everglades.org

**Biscayne Bay Health Coalition
Chair Steering Committee
www.biscaynebayfl.com

**Biscayne Bay Marine Health Summit
Steering Committee and Chair Logistics Committee

**Eco-Logical Solutions
Sustainability Consultant

**Woman's Club of Coconut Grove
Environment Committee

"The human task is to make decisions in the present that grant as much equity across the spectrum of species as possible and help create a future with less tragedy for all species."
Boundaries: A Casebook in Environmental Ethics

ahand@aqhlaw.com
Direct: 305-733-2800

April 15, 2021

Re: Comments on UEA Report dated March 10, 2021

To whom it may concern:

This firm represents Alger Farms, which owns over 1200 acres and farms over 2500 acres of land in South Miami-Dade County. Alger Farms has been a family agricultural business for over 50 years, and there are two more generations that plan to operate the family business for at least 50 more years in the future.
However, the Miami-Dade agricultural industry is under extreme pressure- S&L Farms, Torcise Brothers, Hagen Farms, Dunn Brothers Farms and Darrel Wilson– all large scale multigenerational operations- were forced to close their businesses within the last few years. The remaining large scale multigenerational operations – including Alger Farms- are facing the same tough questions.

The County has identified many challenges facing the agricultural industry, including market factors, labor costs, natural disasters, climate change and sea level rise, saltwater intrusion, etc. The problem is that all of the large-scale agricultural operations are outside the UDB, where the permitted land uses are only agriculture or residential at 1 unit per 5 acres. If land outside the UDB is designated Agriculture, but cannot be cultivated due to the lengthy list of issues identified here and in the County reports, then what is the plan? Is 1 house on 5 acres the best alternative use?

Since almost all privately held land outside the UDB is designated agriculture, any decisions about the UDB and the UEA are inextricably intertwined with the future of agriculture in Miami-Dade County. The County has identified some recommendations in the sea level rise report to support agriculture, but more work needs to be done. There are many stakeholders that should be working together on a comprehensive approach – namely the County, the SFWMD, the HARB, the State through Florida Forever, CERP, and the Federal Government.

Before the County makes any decisions regarding the UEA or the UDB, we respectfully request that the County, together with the agricultural community and other stakeholders mentioned herein, work in earnest to answer the question: What can be done to support and maintain the viability of agriculture in Miami-Dade County? Otherwise, what is the best use of the 53,000 acres of privately held land outside the UDB which is designated agriculture? Is 1 house on 5 acres the best alternative use?

For these reasons and the reasons stated in the County's reports, we respectfully request that the County defer any modifications to the UEA until a coalition of stakeholders proposes a plan for the 53,000 acres of privately held agricultural land outside the UDB.

The following are more specific comments on the March 10, 2021 UEA Report and the County Sea Level Rise Impacts on the Agricultural Community Report.

UEA No. 4

First, the Algers own almost all of UEA No. 4. There have been no changed circumstances since UEA No. 4 was created, and the HARB was in existence at that time. UEA 4 includes Accident Potential Zone 2. The Airport Installation Compatible Use Zone Study *completed by the HARB* shows that there are many uses that are actually compatible with the HARB APZ 2 (see attached). Thus, UEA No. 4 does not need to be contracted to accommodate the HARB because the HARB's own study provides many compatible uses with the UEA. In other words, (a) there is *no new compatibility issue or changed circumstance* that justifies contracting the UEA; and (b) the HARB's AICUZ study identifies many uses that are compatible with the UEA.

Furthermore, there is property in UEA No. 4 that is outside the APZ zone, but still proposed for contraction. There is no justification for this change. As the owner of almost the entire UEA No. 4, the Alger family respectfully requests that you deny the contraction of UEA No. 4 and maintain the status quo.

Imminent Pressures Facing Agriculture

In the March 10, 2020 UEA Report, the County reviews many pressures that the Agricultural community is facing today. In addition, the County Commission will receive the Sea Level Rise Impacts on the Agricultural Community Report at its April 20 meeting about the devastating and imminent impacts of sea level rise, climate change, and environmental factors on the future of Ag operations in Miami-Dade County.

1. **Environmental Conditions.** As noted in the County's Sea Level Rise Report, Climate Change is impacting agriculture now, and those impacts will only increase. Rising temperatures leads to increased competition on Winter crops from producers farther North. Late season heavy rains lead to flooded fields, such that the SFWMD canal system cannot carry water away fast enough to avoid crop loss. Sea level rise does and will continue to impact the seasonal drawdown, which if ceased, would prohibit farming of thousands of acres of land. Hurricanes- even if they occur prior to planting season- prohibit the ability to farm property East of the UDB in South Dade because of saltwater intrusion.

    a. **Sea level Rise.** Sea level rise results in saltwater intrusion into the aquifer and a higher water table. All of these farms are irrigated on site with irrigation wells. Alger Farms and others have lost hundreds of acres due to saltwater intrusion, most recently in 2017. Furthermore, the higher water table makes planting and harvesting difficult, and sometimes impossible, because the farm equipment cannot operate in the muddy field.

b. **Seasonal Drawdown.** As noted in the County's sea level rise report, there is a seasonal drawdown that starts October 15, and has been done for over 40 years. The SFWMD draws down the water table to allow for crop planting and to prevent flooding. The seasonal drawdown is absolutely critical to the ability to farm thousands of acres (as shown on Fig. 14 of the County Sea Level Rise report).

c. **Weather events.** South Florida farmers plant on October 15 of each year, to avoid hurricanes and the heavy rain season. However, recent seasons have had November rains so heavy that the SFWMD could not reduce flooding fast enough to avoid the loss of hundreds of acres of crops.

d. **Hurricanes.** If there is a late season hurricane, farmers cannot plant October 15. Planting October 15 is critical to timing the market for harvest and the possibility of earning a profit. Planting late means (a) more competitors at harvest time; and/or (b) limitation to harvest only one round (instead of 2) of crops. Hurricane Irma (Sept. 2017) also pushed so much saltwater into the aquifer that (a) hundreds of acres of crops were lost due to saltwater intrusion; and (b) hundreds of acres have been out of rotation for subsequent seasons until salinity returns to pre- hurricane levels.

e. **CERP**. The redirection of water as part of CERP is resulting in an increased water table and flow to areas that were previously dry.

2. Market conditions

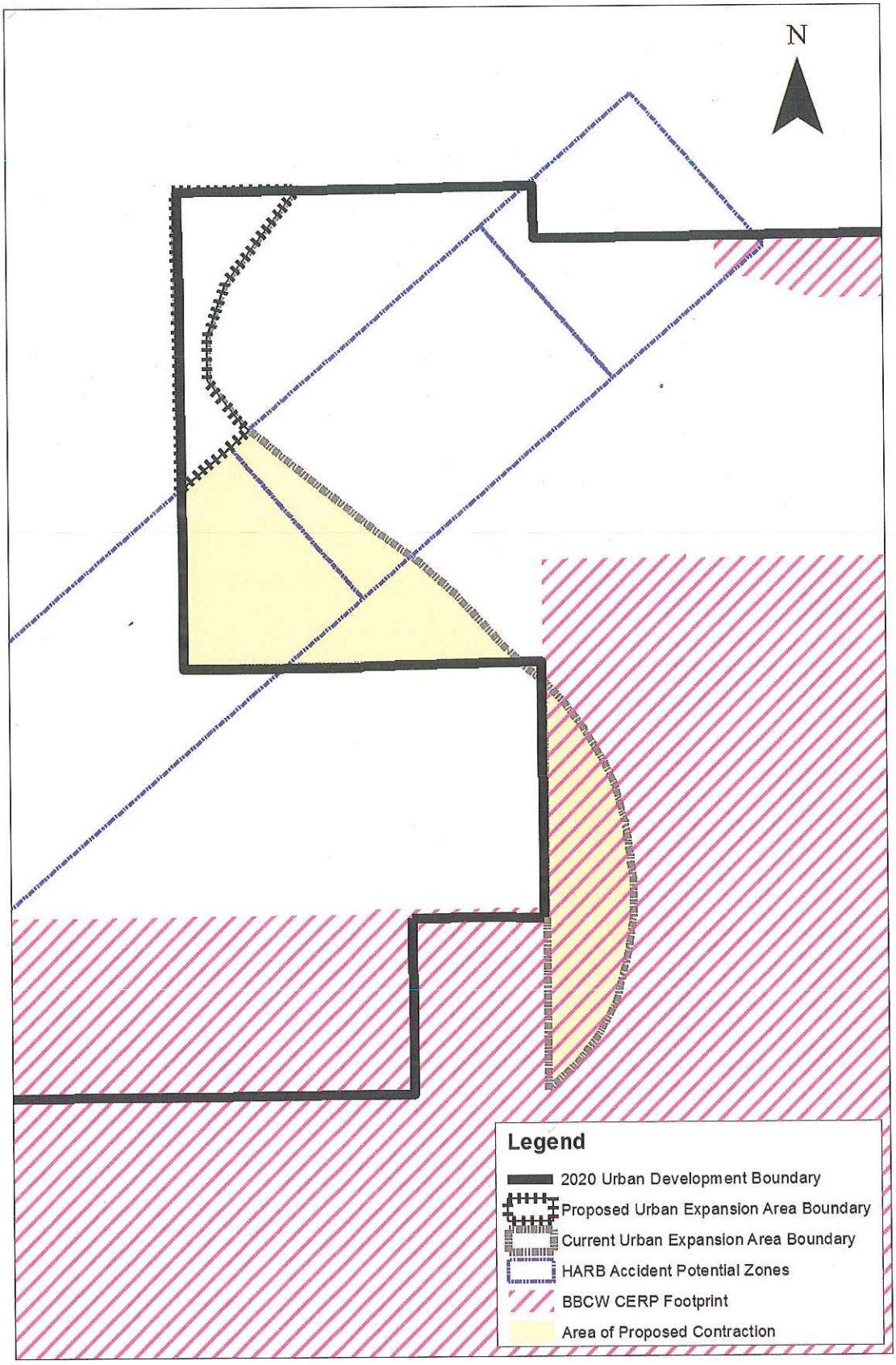
a. **Foreign trade advantage.** Federal Trade policies have given an unfair trade advantage to Foreign produce, and in particular Mexican crops and produce, for at least 10 years. On top of the legislative trade advantages, foreign producers have lower labor costs, lack of environmental regulation which provide an additional advantage.

b. **Competition from Belle Glade/ Immokalee**. In years past, South Miami-Dade County was the only place in the United States that could obtain crop insurance for winter crops because of the risk of freeze everywhere else. This allowed crop farms like Alger Farms to plant and harvest two rounds of crops from October through April each year. Now, farmers in Central Florida are willing to take the risk that due to climate change, there will not be a freeze. Therefore, producers in Belle Glade, Immokalee, and Central Florida plant and harvest in the same 2 cycles, which floods the market and lowers produce market price. On top of that, Central Florida producers have lower production costs, so they enjoy a higher profit margin per acre. This additional competition- brought about by climate change- has made turning a profit near impossible.

Thank you for your thoughtful consideration of these issues that are impacting the viability of the agricultural industry today, and which impacts will only increase. We look forward to working with the County and other stakeholders on a comprehensive plan for the property designated agriculture outside the UDB, including over 1,000 acres owned by Alger Farms.

Sincerely,

By: /s/ Amanda Quirke Hand
Amanda Quirke Hand, P.A.


N
Legend
2020 Urban Development Boundary
Proposed Urban Expansion Area Boundary
Current Urban Expansion Area Boundary
HARB Accident Potential Zones
BBCW CERP Footprint
Area of Proposed Contraction

	Accident & Hazard Zones			Noise Zones	
Land Use	**CZ/ ECZ**	**APZ 1**	**APZ 2**	**Noise Zone 65 dBA**	**Noise Zone 70 dBA**
Residential					
Single units; detached	X	X	C[1]	C[2]	C[3]
Single units; semidetached	X	X	X	C[2]	C[3]
Single units; attached row	X	X	X	C[2]	C[3]
Two units; side-by-side	X	X	X	C[2]	C[3]
Two units; one above the other	X	X	X	C[2]	C[3]
Apartments; walk-up	X	X	X	C[2]	C[3]
Apartments; elevator	X	X	X	C[2]	C[3]
Group quarters	X	X	X	C[2]	C[3]
Residential hotels	X	X	X	C[2]	C[3]
Mobile home parks or courts	X	X	X	X	C[3]
Transient lodgings	X	X	X	C[2]	C[3]
Other residential	X	X	X	C[2]	C[3]
Manufacturing					
Food and kindred products; manufacturing	X	X	A	A	C[5]
Textile mill products; manufacturing	X	X	A	A	C[5]
Apparel and other finished products made from fabrics, leather, and similar materials; manufacturing	X	X	C[4]	A	C[5]
Lumber and wood products (except furniture); manufacturing	X	C[4]	A	A	C[5]
Furniture and fixtures; manufacturing	X	C[4]	A	A	C[5]
Paper and allied products; manufacturing	X	C[4]	A	A	C[5]
Printing, publishing, and allied industries	X	C[4]	A	A	C[5]
Chemicals and allied products; manufacturing	X	X	X	A	C[5]
Petroleum refining and related industries	X	X	X	A	C[5]

	Accident & Hazard Zones			Noise Zones	
Land Use	**CZ/ ECZ**	**APZ 1**	**APZ 2**	**Noise Zone 65 dBA**	**Noise Zone 70 dBA**
Manufacturing					
Rubber and misc. plastic products; manufacturing	X	C[4]	A	A	C[5]
Stone, clay, and glass products manufacturing	X	C[4]	A	A	C[5]
Primary metal industries	X	C[4]	A	A	C[5]
Fabricated metal products; manufacturing	X	C[4]	A	A	C[5]
Professional, scientific, and controlling instruments; photographic and optical goods; watches and clocks; manufacturing	X	X	X	A	C[5]
Transportation, communications, and utilities					
Railroad, rapid rail transit, and street railroad transportation	X	C[6]	A	A	C[5]
Motor vehicle transportation	X	A	A	A	C[5]
Aircraft transportation	X	C[6]	A	A	C[5]
Marine craft transportation	X	C[6]	A	A	C[5]
Highway and street right-of-way	X	A	A	A	C[5]
Automobile parking	X	C[6]	A	A	C[5]
Communications	X	C[6]	A	A	C[5]
Utilities	X	C[6]	A	A	A
Other transportation communications and utilities	X	C[6]	A	A	C[5]
Trade					
Wholesale trade	X	C[4]	A	A	C[5]
Retail trade: building materials, hardware, and farm equipment	X	C[4]	A	A	C[5]
Retail trade: general merchandise	X	C[4]	C[4]	A	C[5]
Retail trade: food	X	C[4]	C[4]	A	C[5]
Retail trade: automotive, marine craft, aircraft, and accessories	X	C[4]	C[4]	A	C[5]
	Accident & Hazard Zones			**Noise Zones**	

Land Use	CZ/ ECZ	APZ 1	APZ 2	Noise Zone 65 dBA	Noise Zone 70 dBA
Retail trade: apparel and accessories	X	C[4]	C[4]	A	C[5]
Retail trade: furniture, home furnishings, and equipment	X	C[4]	C[4]	A	C[5]
Retail trade: eating and drinking establishments	X	X	C[4]	A	C[5]
Other retail trade	X	C[4]	C[4]	A	C[5]
Services					
Finance, insurance, and real estate services	X	X	C[8]	A	C[5]
Personal services	X	X	C[8]	A	C[5]
Cemeteries	X	C[7]	C[7]	A	C[5]
Business services	X	A	A	A	C[5]
Repair services	X	C[4]	A	A	C[5]
Professional services	X	X	A	A	C[5]
Hospitals, nursing homes	X	X	X	C[2]	C[3]
Other medical facilities	X	X	X	C[2]	C[5]
Contract construction services	X	C[8]	A	A	C[5]
Governmental services	X	X	C[8]	A	C[5]
Educational services	X	X	X	C[2]	C[3]
Cultural, entertainment, and recreational					
Cultural activities, including places of worship and public assembly	X	X	A	C[2]	C[3]
Nature exhibits	X	C[4]	A	X	X

	Accident & Hazard Zones	Noise Zones

Land Use	CZ/ ECZ	APZ 1	APZ 2	Noise Zone 65 dBA	Noise Zone 70 dBA
Outdoor music shell, amphitheaters	X	X	X	X	X
Outdoor sports arenas, spectator sports	X	X	X	X	X
Amusements	X	X	A	X	X
Recreational activities (including golf courses, riding stables, water recreation)	X	C[9]	C[9]	A	C[5]
Resorts and group camps	X	X	X	C[2]	C[3]
Parks	X	C[9]	C[9]	A	C[5]
Other cultural, entertainment, and recreation	X	C[9]	C[9]	C[2]	C[3]
Resources production and extraction					
Agriculture (except livestock)	C[10]	A	A	C[11]	C[12]
Livestock farming and animal breeding	C[10]	A	A	C[11]	C[12]
Agricultural-related activities	C[10]	A	A	C[11]	C[12]
Forestry activities and related services	C[10]	A	A	C[11]	C[12]
Fishing activities and related services	X	C[10]	A	A	A
Mining activities and related services	X	C[10]	A	A	A
Other resources production and extraction	X	C[10]	A	C[11]	C[12]

Notes:

1 Maximum density may not exceed one (1) dwelling unit per acre, except where pursuant to section 1.6 (4) of this section 30-6, development rights are transferred from APZ I, in which case density may not exceed two (2) dwelling units per acre.

2 Development is conditioned on design and construction providing for an average minimum Noise Level Reduction (NLR) of average minimum twenty-five (25) dBA throughout the facility or dwelling. NLR criteria will not eliminate outdoor noise problems. However, building location and site planning, and design and use of berms and barriers can help mitigate outdoor exposure, particularly from near ground level sources.

3 Development is conditioned on design and construction providing for an average minimum Noise Level Reduction (NLR) of average minimum thirty (30) dBA throughout the facility or dwelling. NLR criteria will not eliminate outdoor noise problems. However, building location and site planning, and design and use of berms and barriers can help mitigate outdoor exposure, particularly from near ground level sources.

4 Small neighborhood stores and uses are allowed but shopping malls and shopping centers are prohibited.

5 Development is conditioned on design and construction providing for an average minimum Noise Level Reduction (NLR) of average minimum twenty-five (25) dBA in the portions of these buildings where the public is received, office areas, noise-sensitive areas, employee lounge areas, or where the normal noise level is low.

6 No passenger terminals or aboveground transmission lines.

7 Chapels are prohibited.

8 Office uses that do not involve the regular reception of customers are allowed. Meeting places, auditoriums, and similar structures are prohibited.

9 Clubhouses, enclosed gathering places, and other large gatherings of people are prohibited.

10 Enclosed buildings are prohibited.

11 Residential buildings require an average minimum NLR of average minimum twenty-five (25) dBA throughout the dwelling.

12 Residential buildings require an average minimum NLR of average minimum thirty (30) dBA throughout the dwelling.

15 April 2021

Miami-Dade County Planning and Zoning Officials:

The South Florida Defense Alliance (SFDA) works to unite, champion, and grow the defense and national security-related community here in South Florida. We take a view of issues designed to support our local military installations and commands, balanced with the needs and requirements of our local communities. In that spirit, we express caution that the recently proposed Urban Development Boundary (UDB) expansion efforts in South Miami-Dade County needs to be done in advance coordination with the Commander of the 482nd Fighter Wing at Homestead Air Reserve Base (HARB) as required in Florida Statute 163.3175. That state legislation requires:

"…local government must transmit to the commanding officer of the relevant associated installation or installations information relating to proposed changes to comprehensive plans, plan amendments, and proposed changes to land development regulations which, if approved, would affect the intensity, density, or use of the land adjacent to or in close proximity to the military installation. At the request of the commanding officer, affected local governments must also transmit to the commanding officer copies of applications for development orders requesting a variance or waiver from height or lighting restrictions or noise attenuation reduction requirements within areas defined in the local government's comprehensive plan as being in a zone of influence of the military installation. Each affected local government shall provide the military installation an opportunity to review and comment on the proposed changes."

HARB provides a strong economic engine for South Miami-Dade County, and new opportunities there such as the Florida National Guard expansion plans, introduction of the F-35 Joint Strike Fighter aircraft and a potential Joint Use Agreement for general aviation support, all offer to increase the economic and civilian community support benefits of continued, robust military operations at HARB. HARB also recently completed an update to their Air Installations Compatible Use Zone (AICUZ) assessment that takes into account the potential change in aircraft operating from HARB.

The SFDA urges that Miami-Dade County strongly consider all of these factors to ensure UDB changes, and associated updates to planning and zoning, are compatible with successful and sustained military operations at HARB.

Sincerely,

Richard M. Miller
Captain, USN (Ret)
Executive Director

Steven C. Williamson
Colonel, USA (Ret)
President & Chairman of the Board

Brown, Kimberly (RER)

From:	Christina Miskis <CMiskis@sfrpc.com>
Sent:	Thursday, April 15, 2021 5:11 PM
To:	UEA Study Comments (RER)
Cc:	Isabel Cosio Carballo; Mark Cassidy; Jason McMahon; Eralda Agolli; Kathe Lerch
Subject:	SFRPC Comments on the Draft Miami-Dade County Urban Expansion Area Report

To Whom it May Concern:

Thank you for the opportunity to comment on the Draft Miami-Dade County Urban Expansion Area Report.

As background, the South Florida Regional Planning Council (SFRPC) serves three counties: Monroe, Miami-Dade, and Broward; 71 municipalities; and 4.3 million residents in the region. Mandated by statute and adopted by rule into the Florida Administrative Code, the Strategic Regional Policy Plan for South Florida (SRPP) was created through a regional process in which key public, private, and non-profit stakeholders participated in the identification of key issues and development of regional goals and policies.

Using the SRPP regional goals and policies as a guide, the SFRPC offers the following comments on the Draft Miami-Dade County Urban Expansion Area Report.

SFRPC Comments Specific to Recommendations

- **"Recommendation No. 1 – Once the need exists to identify additional Urban Expansion Areas, the County should look to areas with fewer constraints and good access to infrastructure and incorporate policies into the CDMP to address potential impacts." (Pgs. 94-95).**
    - SFRPC COMMENT - The county should recommend specific policies that require extensive review of costs associated with infrastructure quality and future flood risk in areas within and outside the UDB. The increase in flood risk will accelerate the need for infrastructure retrofitting in areas of development at a cost to the county (P. 42). It is already estimated that Miami-Dade will experience a loss of $1.345 billion in property tax revenues which will be in addition to keeping up with the cost of improvements and replacements of infrastructure (Table 8; P. 42). The recommended policies should require the consideration of costs related to infrastructure replacements and retrofitting; increased flood vulnerability; and changes in NFIP Community Rating and classification. These policies should go beyond the review of sea level rise.

- **"Recommendation No. 3 – Add a policy to the CDMP to reevaluate truck parking demand by 2030 to determine whether the current land supply is sufficient." (Page 96)**
    - SFRPC COMMENT - Regarding the recommended reassessment of truck parking needs in the County, consider including language that directs the reassessment to identify strategies

to implement low impact and resilient development in truck parking such as using permeable surfaces.

- **"Recommendation No. 4 – Add a policy to the CDMP to identify opportunities to increase the diversity of housing options inside the Urban Development Boundary with particular focus on increasing the supply of attached single family housing while maintaining the character of established neighborhoods." (Page 96)**
    - SFRPC COMMENT - To support a diversity of housing, consider recommending a follow-up assessment to previous reports, regarding allowing ADUs (accessory dwelling units) in more zoning districts. Models of ADUs can be pre-approved for selection by property owners to shorten the time needed for review and approval by the County. A successful model can be found in California: https://www.hcd.ca.gov/policy-research/accessorydwellingunits.shtml
    - In townhouse developments, consider adding guidance on increasing points of entry and exits to facilitate connectivity of active and automated modes and improve access of emergency vehicles.

- **"Recommendation No. 5 – Designate land that is located outside of the Urban Development Boundary as a Regional Asset and provide for continued County governance over such areas." (Page 97)**
    - SFRPC COMMENT - Recommendation No. 5 and the originally recommended contractions of the Urban Expansion Area (UEA) would protect Natural Resources of Regional Significance identified in the SFRPC Strategic Regional Policy Plan by removing CERP and important wetlands from within the UEA. This is vital for the long term environmental and economic resilience of South Florida. The CERP and regionally significant wetlands protect the health of regional ecosystems and wildlife habitats like Biscayne Bay and Florida Bay, as well as the viability and quality of the Florida and Biscayne Aquifers.
    - SFRPC COMMENT - Recommendation No. 5 and the originally recommended contractions of the Urban Expansion Area (UEA) would protect the compatibility of military activity, a regionally important activity, with surrounding uses in Homestead.

General SFRPC Comments

- **Consider including a vacant land map and analysis** in addition to numerical analysis of square footage available would benefit the report.
    - Proximity (ability to assemble) and parcel size are also important considerations in the usefulness of available vacant land.
    - Parcels that are small and scattered are less desirable for development. A spatial component to the analysis can show if it the vacant land is desirable for industrial development. It can also identify the opportunities for infill development, which would support the analysis of the UDB and UEA boundaries.

- **Examine balance and availability of non-residential uses.**
    - Regardless of the magnitude, we expect a high likelihood of demand for office space and retail to trend lower in the future and the report could note the trends.
    - It is a reasonable expectation that in addition to the vacant land currently available for industrial, we can expect that a portion of the now-surplus office and retail can be converted to industrial.
    - Example article: https://www.globest.com/2020/08/12/big-box-retail-transforms-into-industrial-warehouses/?slreturn=20210312102941
    - This further supports recommendations on contracting the UDB/UAE area.

- **Consider including more detailed policy direction in the recommendations.**
    - Consider using implementing policy to standardize the use of economic development tools such as Community Benefits Agreements or Impact Fees to accommodate the economic, environmental, or transportation related impacts to the community when considering development tools like expanding urban development boundaries or relaxing other development regulations.
    - Standardized policy not only ensures that the community receives adequate benefits to local development without compromising future capacity, but that the process is fairly applied to all market players without cherry picking development proposals to require undue exactions.

- **Consider including an analysis of labor force characteristics** of various areas of the County in the report.
    - Consider adding data for Civilian Labor Force Level, educational attainment and other employment projections which are a factor in demand for industrial and commercial land use.

Thank you for the opportunity to comment. Please let us know if you have any questions or require further input.

Best,
Christina

.....

Christina Miskis, MURP
Senior Planner
South Florida Regional Planning Council
One Oakwood Blvd, Suite 250
Hollywood, FL 33020

cmiskis@sfrpc.com (954) 924-3653
Confidentiality Notice: Please note that Florida has a broad public records law and all correspondence sent to me via email may be subject to disclosure.

April 15, 2021

Ms. Lourdes M. Gomez, Director
Regulatory and Economic Resources Department
Miami-Dade County

Re: Transmittal of Draft Urban Expansion Report and comments to Impact on Housing

Dear Ms. Gomez

This letter is a summary of the attached economic and housing data on affordability. The summary provides commentary about Miami-Dade's housing costs as unaffordable and the highest in Florida.

Miami-Dade is dealing with a housing affordability crisis in which residents face challenging housing cost relative to household incomes. Miami-Dade is the least affordable market in Florida as shown by the price comparison on Table 1.

In Table 1's review of other counties like **Miami-Dade, the comparison counties have policies that constrain development in certain areas and prioritize development in other. However, none of the comparison counties were found to have a growth boundary as restrictive as Miami-Dade.**

The data provided in the Transmittal Draft Urban Expansion Report does not present fairly to the County Commission the right information to help decide on how to create more affordable housing. The information as presented only reflects the percentage of **price rise** on housing – which confirms their current policy position: there is sufficient land inside the UDB to provide affordably priced housing.

The index is not correct, when discussing the County's housing affordability issue. Instead, an Affordability Index, would accurately show how many families – on a percentage basis – can afford to purchase a home. The Housing Affordability Index measures whether a typical family earns enough income to qualify for a mortgage loan on a typical home at the county levels based on the most recent price and income data.

Thus, as part of an overall strategy to make housing more affordable priced to more families, it is recommended that County policies be amended, to reduce the policies which overly constrain smart growth and good development by allowing a balance of supply and demand. This will help to ease the housing cost and price burden on many families.

Sincerely,



Craig Perry

To understand home pricing, Table 3, shown below, was included in the Transmittal Draft of the Urban Expansion Report.

- **However, the fact of using 2010 as a base year of 100, does not provide clarity on the affect of pricing.** Using a base year analysis does not assume every county starts at the same base year price.
- **Therefore, this type of index is not a measurement on home price but a percentage gain in the price of homes.** If you do not account for the starting price point of a home as above, then the index has no meaning.

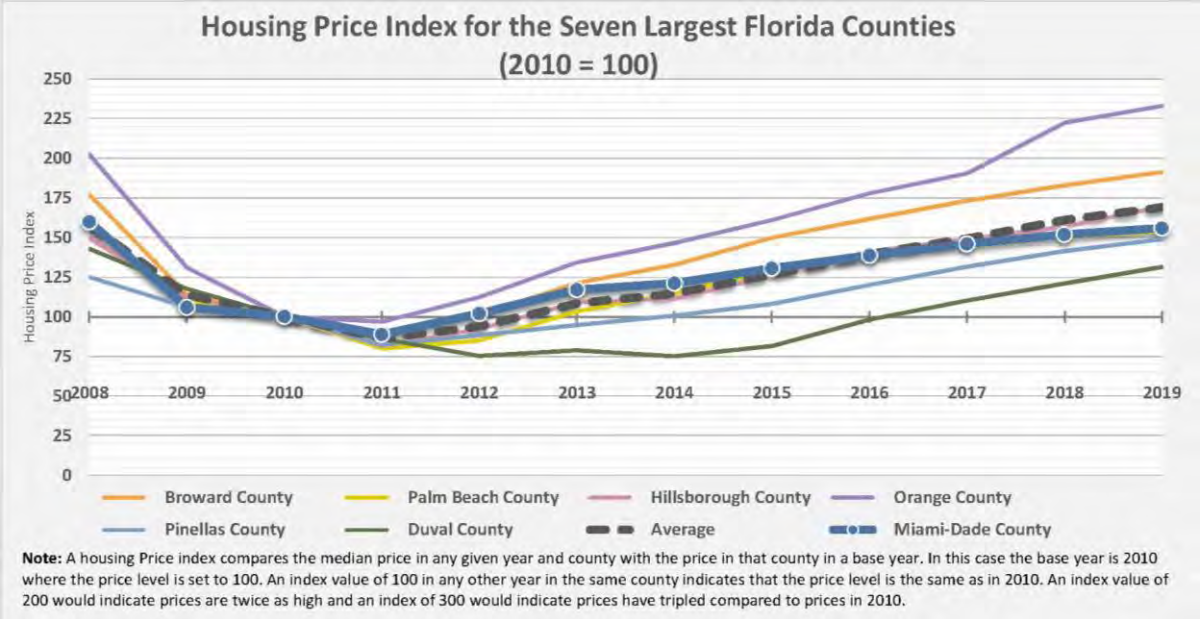
Impact on Housing Prices

Miami-Dade County, like other major metropolitan areas, has experienced sharp increases in housing costs in recent years. Analysis conducted by the County's Planning Division has found that it is not possible to isolate the Urban Development Boundary as a contributing factor to housing price inflation.

There are numerous factors that affect the cost of housing including locational factors, neighborhood amenities, and influence by foreign markets, among others. Housing price changes since 2008 in Miami-Dade County were compared with the seven largestcounties in Florida (see Table 3).

Similar to Miami-Dade County, the comparison counties have policies that constrain development in certain areas and prioritize development in other areas. However, none of the comparison counties were found to have a growth boundary as restrictive as Miami-Dade County. The data shows that price fluctuations in Miami-Dade County over time were consistent with the average price increases of the comparison counties which supports a conclusion that the UDB does not appear to be exerting inflationary pressure on housing prices.

Table 3



Data Source: Zillow.com accessed on October 21, 2019; Planning Research and Economic Analysis

- **The Housing Affordability Index measures whether a typical family earns enough income to qualify for a mortgage loan on a typical home at the county levels based on the most recent price and income data.**
- But: the data provided below, is a measurement showing just the opposite effect as drafted, Impact on home pricing is a direct function of supply and demand.
- Thus, it is clear based on the data shown below, that Miami Dade County is the least affordable market and the most expensive home prices as measured by the below counties.

Table 1

	Median Home Price	Average Annual Income	Affordability Index	Average Home Price
Miami-Dade County	**375,000**	**58,032**	**6.46**	**775,286**
Orange County	280,000	54,912	5.10	340,300
Palm Beach County	343,000	57,980	5.92	640,803
Broward	316,500	56,160	5.64	461,583
Tampa MSA (Pinellas and Hillsborough County)	295,000	48,698	6.06	355,275
Duval	237,000	55,796	4.25	283,530

Source:
US Bureau of Labor Statistics 3rd Quarter 2020
Realtors Multiple Listing Service February 2021
Affordability Index is equal to Median Home Price divided by Average Annual Income

Brown, Kimberly (RER)

From: Glenn Brearley <brearleyg@bellsouth.net>
Sent: Thursday, April 15, 2021 6:55 PM
To: UEA Study Comments (RER)
Subject: study comments

Having read the report, I fully support the statement on page 94 "no additional UEA's are recommend at this time". Farmlands of unique importance are critical to maintaining the acreage necessary for a viable agriculture industry in Miami Dade. It became clear during the Covid crisis that U.S. farmland is of strategic importance and any loss of these farmland only increases our reliance on foreign markets for food.

Sent from AT&T Yahoo Mail on Android

Brown, Kimberly (RER)

From: David King <treewalking@att.net>
Sent: Friday, April 16, 2021 11:20 AM
To: UEA Study Comments (RER)
Subject: March 10 Urban Expansion Area Report

Please know that my wife and I fully support this report as drafted.

David King
21910 SW 250 Street

Brown, Kimberly (RER)

From: Manning, Terese <tmanning@sfwmd.gov>
Sent: Friday, April 16, 2021 12:27 PM
To: UEA Study Comments (RER)
Cc: Bell, Jerry (RER)
Subject: Informal Review Comments on Miami-Dade County Draft Urban Expansion Area Report

Dear Mr. Bell:

The South Florida Water Management District (District) has completed its informal review of the Draft Urban Expansion Area Report, developed pursuant to Miami-Dade County Comprehensive Development Master Plan (CDMP) Policy LU-8J. The Policy requires completion of a study of additional areas that may be identified as Urban Expansion Areas, with a goal of replacing the 1,993 acres that were proposed for removal in Application No. 5 of the Evaluation and Appraisal Report Amendments in the May 2019 CDMP Amendment Cycle. The Policy also requires identification of potential additional uses that would be appropriate for the Urban Expansion Areas, particularly near the Homestead Air Reserve Base. There appear to be no regionally significant water resource issues; therefore, the District forwards no comments on the proposed draft Report.

An informal review does not constitute a final determination for a potential proposed Comprehensive Plan Amendment adopting the Urban Expansion Area Report into the CDMP. At the time a proposed amendment is provided to the District for review the District will evaluate the amendment and further comments may be provided. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

Ms. Terry Manning, Policy and Planning Analyst
South Florida Water Management District
Water Supply Implementation Unit
3301 Gun Club Road
West Palm Beach, FL 33406
Phone: 561-682-6779
Fax: 561-681-6264
E-Mail: tmanning@sfwmd.gov

Builders Association
of South Florida
BUILDING GREAT CITIES
SINCE 1944

www.basfonline.org
111 NW 183rd Street, Suite 111
Miami Gardens, FL 33169

April 16, 2021

Ms. Lourdes M. Gomez, Director
Regulatory and Economic Resources Department
Miami-Dade County
111 NW First Street, 29th Floor
Miami, FL 33128

Via email only

Re: Builders Association of South Florida ("BASF") Comments to Draft Urban Expansion Area ("UEA") Report / Dated March 10, 2021 ("Report")

Dear Ms. Gomez:

This letter sets forth the BASF's comments on the above-referenced Draft Report. The purpose of the proposed Report was to respond to Resolution No. 81-20, adopted by the Board of County Commissioners (BCC) during the discussion of CDMP Application No. 5, prepared by staff, during the Comprehensive Development Master Plan ("CDMP") meeting held on July 20, 2020 and pursuant to Policy 8J of the CDMP. Specifically, the purpose of this exercise is to "complete a study of (I) additional areas that may be identified as Urban Expansion Areas, **with a goal of replacing the 1,993 acres that were proposed for removal in Application Number 5 … (emphasis provided).** It is important to note that the Urban Expansion Areas that were depleted were within Urban Expansion Areas 2, 3 and 4, and had been designated for, "Future Development" for over the past 40 years on the County's CDMP Future Land Use Plan map.

Recommendations

Upon review, it appears that the Draft Report's actual **goal was** just the opposite. Rather than review the County with an intent to replace potential expansion lands, the Draft Report concludes that there is no apparent need to make an effort to replace the 1,993 acres. The **BASF respectfully disagrees and makes the following points:**

A. **Recommendation No. 1 of the report does not propose to replace acreage into UEAs 2, 3 and 4 - from which land is proposed to be removed.** Instead, Recommendation No. 1 simply identifies land in UEA 1, once "need exists" and then proceeds to outline why there is no need - and why there won't be a need - for decades (save a significant demand for single-family housing). (Report at p. 94). **This is hardly attempting to meet the requested goal. Rather, just the opposite is proposed.**

B. **Recommendation No. 2** proposes, among other things, that a policy be added to the CDMP which requires that a demonstration that a particular use cannot be accommodated within the UDB and to provide "extraordinary vote requirements" to accomplish the same, a virtual impossibility that hardly meets the stated goal.

C. **Recommendation No. 3** discusses the need for land to accommodate truck parking demands primarily in UEA No. 1. While commercial truck parking is an important need to be addressed, the Report appears to promote that use for UEA No. 1 - which is also the same land the report contemplates, to support potential UEA expansion.

D. **Recommendation No. 4** seeks to "...identify opportunities to increase the diversity of housing options inside the UDB with particular focus on increasing supply of attached single-family housing..." While the BASF supports any effort by the County to expand the residential land supply anywhere, we suggest that policies which effectively replace single family detached densities with townhouse densities does not solve the problem. This recommendation does not consider inherent additional increases in land and construction costs on parcels inside the UDB. Smaller-scale construction has a set of built-in cost drivers, which have not been considered. Given Miami-Dade's chronic housing affordability crisis, a short list includes these points:

- Required homeowner maintenance costs to live in a townhome community usually built with private roads.
- A lack of available infrastructure and subsequent cost to install additional infrastructure.
- Time and cost required to demolish and remove existing buildings on some parcels before construction can begin.

A major issue which continues to remain unaddressed is the fact that, while industrial absorption is appropriately measured using individual tiers and regional data, residential land supply and demand analysis is evaluated on a County-wide basis. This approach to calculating absorption rates results in providing skewed residential demand information. By calculating residential need and absorption on a county-wide basis, this would make a "residential unit" on Brickell Avenue - priced at $1 million – comparable to a "residential unit" priced at $375, 000 in West Miami-Dade. This matter needs to be corrected as soon as possible, to ensure the County Commission receives the most accurate information about residential demand. Correcting this error will more accurately portray the true state of how much land is needed – based on a more accurate calculation of who is buying housing, where and at what price-point.

Again, Recommendation No. 4 does not consider inherent additional construction costs on parcels inside the UDB. Smaller-scale construction has another set of built-in cost driver, which have not been considered and does nothing to address Miami-Dade's chronic housing affordability crisis.

E. **Recommendation No. 5** actually seeks to designate existing land as a "Regional Asset," a new concept that runs directly contrary to the County Commission's stated goal of replacing the 1,993 acres that were proposed for removal in Application Number 5.

F. **Recommendation No. 6** suggests that the Redland boundaries be better defined in order to preserve this largely hobby-farm area. Even though Recommendation 6 calls for a delineation of a southern boundary for the Redland, (report at page 97) no southern boundary is proposed. Instead of providing more certainty for the public, the door is left open for continued public policy debates in the future.

While the Draft Report suggests that there may be acreage numbers within UEA No. 1 may "add up" to the loss of the over 1,900 acres, the areas proposed for future inclusion into a UEA – once a need has been identified – are unsuitable due to multiple drawbacks. While the BASF suggests that the land within UEA No. 1 be considered for UEA expansion, it too is complicated to develop and access. The nearby presence of rock-mining operations alone has impacted the land use decisions in northwest Miami-Dade County for decades.

Conclusion

In conclusion, instead of this important effort being one that clarifies and achieves the desired goal of identifying new UEA acreage, and where our County's future development opportunities should be located, the report:

- Continues to justify the removal of 1,900 acres without replacing them.
- Identifies two areas for "future development" that offer extremely limited options for future development.
- Ignores the single-family land depletion date of 2024 without making any recommendations for future single-family communities; and
- Reduces housing choices for Miami-Dade County residents to townhomes, inside the UDB instead. This would significantly limit the consumer's choices for where and how to live and work.

Rather than adopt a report which offers extremely limited and unattractive options- and little future progress - it is respectfully recommended that the County Commission ask staff to do the following: 1) meet with members of the building and development community who know where the opportunities are, and 2) jointly develop a map based on these opportunities.

BASF looks forward to the opportunity to continue working with County staff on this very important community plan: it's about our future. Thank you for the opportunity to present the Association's views.

Sincerely,

Truly Burton

Ms. Truly Burton
Executive Vice President

cc: Mr. Jerry Bell, Assistant Director, Planning Director
Miami-Dade County Commission Chair Jose Diaz
and County Commissioners
Mayor Daniella Levine-Cava

South Dade Logistics & Technology District

Via E-Mail

Ms. Lourdes M. Gomez
Director
Department of Regulatory and Economic Resources
111 NW 1st Street
Miami-Dade County
Miami, Florida

April 16, 2021

Re: Draft Urban Expansion Area Report, dated March 10, 2021

Dear Ms. Gomez:

We represent the Phase I and the Phase II applicants in the pending CDMP amendment application submitted to create the South Dade Logistics & Technology District (SDLTD).

We have reviewed County staff's draft Urban Expansion Area Report, provided pursuant to CDMP Policy LU-8J, dated March 10, 2021. We have concluded that the report falls far short of its goals, for the reasons set forth in the attached White Paper.

We look forward to continued dialogue with you and your excellent team of County staff professionals.

Sincerely yours,

Jeffrey Bercow, Esq.
Bercow Radell Fernandez Larkin & Tapanes
Counsel for SDLTD Phase I
200 S. Biscayne Boulevard, Suite 300
Miami FL 33131

Juan J. Mayol, Jr.

Holland & Knight LLP
Counsel for SDLTD Phase II
701 Brickell Avenue, Suite 3300
Miami, FL 33131

cc: Mayor and County Commissioners

South Dade Logistics & Technology District

Response to Draft UEA Report

On behalf of the South Dade Logistics & Technology District, we submit this response to the draft Urban Expansion Area Report, provided pursuant to CDMP Policy LU-8J, dated March 10, 2021.

The Board of County Commissioners, adopted Ordinance No. 20-77 on July 22, 2020, which directed County planning staff to "complete a study of (i) additional areas that may be identified as urban expansion areas, with a goal of replacing the 1,993 acres that were proposed for removal in Application No. 5 of the Evaluation and Appraisal Report amendments in the May 2019 CDMP Amendment Cycle, and (ii) potential additional uses that would be appropriate for the Urban Expansion Areas, particularly near the Homestead Air Reserve Base."

The Report does not accomplish its intended goal: Replacing 1,993 acres.

- The draft UEA Report fails to identify additional lands to replace the 1,993 acres proposed for removal in Application No. 5 of EAR-based CDMP amendments, as the BCC directed. Instead, the Report asserts that "the UDB and UEAs, including proposed contractions, are sufficient to accommodate long-term population growth" and that "no additional Urban Expansion Areas are recommended." (Draft UEA Report, p. iv, p.94).

- The Report argues that even though there is no current need for additional UEA lands, when there is a need to identify additional Urban Expansion Areas, the County should "look to" two Detailed Analysis Areas: 1A, the truck parking area in Open Land Area 1; and 3A, the area along the Busway.

- The suggestion to "look to" 2 additional areas falls far short of the BCC directive to replace the 1,993 acres proposed for removal from the UEA.

- The two Detailed Analysis Areas are riddled with land use and environmental constraints that doom any future urbanization attempts. Area 1A includes a significant area within the North Lake Belt Comprehensive Everglades Restoration Plan (CERP) that is also designated as Wetlands of Regional Significance. Both designations are areas that should be avoided for UDB expansion in CDMP Policy LU-8G. Furthermore, a substantial portion of the area is owned by rock mining interests but has not been excavated to date. The area may also have archeological resources.

- Area 3A, located adjacent to the Busway, is within the Redland agricultural area which CDMP Policy LU-8G identifies as an area that shall not be considered for expansion of the UDB. The Area also includes pockets of designated habitat for the federally-endangered Bartram's Scrub-Hairstreak Butterfly. This habitat area is pine rocklands, with pineland croton, the only known hostplant for the butterflies. The Florida Natural Areas Inventory identifies pine rockland as "critically imperiled globally" due to its rarity and high risk of extinction. Further, a large portion of Detailed Analysis Area 3A was included in a prior effort to designate lands as Urban Expansion Area that was withdrawn due to strident stakeholder opposition.

The Report does not accomplish its intended goal: Additional uses near HARB.

- The draft UEA Report also does not identify potential additional uses that would be appropriate for the Urban Expansion Areas, particularly near the Homestead Air Reserve Base (HARB). Instead the Report recommends the incorporation of criteria into the CDMP to address uses that have a unique need to locate outside of the UDB and providing for a reassessment of commercial truck parking needs by 2030. (Draft UEA Report, p. iv, pp 95,96). These recommendations fall far short of identifying uses appropriate for the UEAs, especially the UEA near the HARB as the BCC intended.

- The draft UEA Report is really not a study about the UEAs. It is the author's argument about why the Urban Development Boundary (UDB) does not need to be expanded. For example:

    - "There is sufficient residential capacity within the UDB to accommodate projected population growth beyond 2040." (p. 10).

    - "There is sufficient countywide capacity of industrial beyond 2040. In addition, there is sufficient capacity of industrial land in each of the Planning Tiers beyond 2040, except for the South-Central Tier which has a projected depletion year of 2030." (p. 10).

The Report overstates available industrial capacity.

- With respect to industrial land capacity in the South Tier, the draft Report overstates the actual available capacity. The South Tier extends south from SW 184th Street and includes Minor Statistical Areas (MSAs) 7.1 through 7.5. The report states that in the South Tier there currently are 447.85 vacant acres of industrial land, which we have determined is based upon 174 separate folio numbers assigned by the Property Appraiser.

- In order to attract and facilitate the development of industrial parcels by end-users such as Federal Express, UPS, and Amazon – just to name some of the more recent major industrial land tenants in the South tier – land must be of a sufficient size, regular configuration and be proximate to the expressway network. Although 20 acres is the preferred minimum size, a 10 acre parcel can accommodate some smaller users.

- We have determined the following with respect to the South Tier vacant industrial land inventory:

    - Just 18 of the parcels, or just over 10 percent of the total number of parcels, are 10 acres or larger.

    - Only 10 parcels are greater than 20 acres in size.

    - Of the 18 parcels comprised of more than 10 acres, 7 are either currently being developed, have approved plans for their near-term development or have submitted

- plans to the appropriate governmental agency for review. Those 7 parcels constitute approximately 288 acres, or 64% of the total "vacant" industrial acreage.

- The remaining 11 parcels are constrained in various ways, either because they are in a HARB Accident Protection Zone, are irregularly shaped and thus inefficient or unable to accommodate large scale users, are adjacent to residential uses which could make entitlements difficult to achieve, or are in the Homestead Park of Commerce (HPOC) which has been unsuccessful in attracting users for a variety of reasons including poor access to the County's highway network.

The Report understates industrial absorption.

- The report states that the annual absorption rate of vacant industrial land in the South Tier is approximately 5 acres per year. However, since 2017,a total of approximately155.5 acres were absorbed including 2 relatively small parcels in HPOC, land for non-operable vehicle storage in Princeton, and economic development "gift lands" that FedEx now occupies, and on which facilities are currently being constructed for Amazon.

It is also anticipated that before the end of the 2021, an additional 208 acres will either be under development or placed into service as inoperable vehicle storage sites. Thus, the average annual absorption during the 2017 – 2021 5-year period will approximate 72.7 acres per year or **more than 14 times the County's estimate for the area**. We recognize that the County's estimate is based on a period longer than 5 years. However, this approach is flawed when analyzing an area like the South Tier that has an emerging economy and is changing rapidly.

Agriculture East of the UDB depends on artificial water table drawdowns.

- The East Glade agricultural area (east of the UDB) is made farmable by seasonal drawdowns of the water table that have occurred since 1981. The area affected by the seasonal drawdown is depicted on Figure 14 of the Report (p. 35). Without these seasonal drawdowns, there is a high probability of ground water penetrating the crop root zone and causing crop damage or crop loss. These seasonal drawdowns may also become harder to maintain as groundwater levels increase in the East Glade areas as a result of sea level rise.

- These operational drawdowns are inconsistent with the Report's inclusion of the East Glade area in the figure of farmlands of unique importance (Figure 10). Farmlands of unique importance exist only where the property can produce high yield crops when the soil is treated and managed in accordance with acceptable farming methods. The East Glade area is only arable due to the artificial SFWMD drawdowns.

The Report mischaracterizes the minimum acreage of agricultural land.

- The Report refers to the County's Agricultural lands study from 2002, as the basis for the assertion that 52,000 acres of land is necessary for a viable agricultural industry. In fact, the 2002 analysis is much more nuanced.

- The study's 52,000 acres figure was based on historical trends and assumptions holding true until the year 2025. The study actually states that by the year 2050, the amount of agricultural land required would be only 27,000 acres.

Generalized Commute Patterns (Figure 19)

- The report states that for the area south of SW 184th Street, the majority of intra-County commuters remain within the area. The statement is inconsistent with the American Community Survey for the five-year period 2015 to 2019, which shows that approximately 65 percent of the people 16 years of age or older who live in the South Tier and work outside their home commute to work for 30 minutes of more. Further, 45 percent of those individuals commute for more than 60 minutes and 10 percent for more than 90 minutes.

The Report also disregards single family housing depletion.

- The report states that single family housing inventory will be depleted by 2024, warranting County consideration of how it can ensure a sufficient mix of housing options: "the County should aim to strategically increase the diversity of housing options, **focusing primarily within the UDB**" (emphasis added) (pg. 4). Why doesn't the report consider including more land to the UEAs to help address single family housing depletion, since the BCC specifically requested replacement of 1,993 acres eliminated from the UEAs?

Brown, Kimberly (RER)

From: Dannielle Temple <dtemp001@gmail.com>
Sent: Sunday, April 18, 2021 1:42 AM
To: UEA Study Comments (RER)
Subject: Land Development

I am opposed to opening additional land for development when there are already over 2,660 acres of developable Industrial land within the current UDB.

Sincerely,

Danielle Temple

Why do all buffer lands around the UDB matter to the health of Biscayne Bay?

By: Albert Gomez

My name is Albert Gomez, a local business man and technologist born and raised in Miami. Most of my life has been spent on the water diving, fishing, sailing, boating and kayaking, enjoying the natural wonder that is Biscayne Bay. My studies focused on Ecology and Environmental Sciences, but also Business, Marketing, and International Studies. My business is manufacturing and technology, and I support all sorts of industries that touch all parts of our day-to-day lives. For this reason, I can speak from a position of experience, when I say, businesses vitality and jobs are critical for a vibrant community and economy. That said, respecting and understanding the importance of our natural resources is also just as important. To borrow a statement from various politicians, “the environment is the economy”.

With this in mind, I helped co-found the Biscayne Bay Marine Health Summit in 2017 with mutual friends and advocates. We have convened 3 summits and released recommendations and ordinances, some which have come to fruition, such as the push for a task force, and a CBO-Chief Bay Officer. Both the Biscayne Bay Task Force and CBO were realized and the recommendations ratified by commission. Today we find ourselves dealing with fish kills, algae blooms, and sea grass die offs. Our bay is in peril and it is directly related to our activities.

Now more than ever, we need to have common sense governance that properly values our environment and acknowledges that our actions thus far, is what has imperiled our one-of-a-kind national monument, Biscayne Bay. For this reason, I would like to address the importance of the environment, and more specifically buffer lands and the UDB-Urban Development Boundary in relation to Biscayne Bay health.

Right now there are various campaigns being mounted with associated ordinances under the auspice of the economy, jobs, and land rights. Each of these campaigns looks to disregard the Urban Development Boundary, by converting agricultural land into commercial logistics hubs and/or general development. These plans disregard federal guidances from the Department of the Interior highlighting the importance of buffer lands for reducing the negative impacts of urban development towards natural ecosystems and to help reduce the interactions of humans & endangered species, their nesting areas and habitat.

Furthermore, as a Floridian, we all know the CERP-Comprehensive Everglades Restoration Plan. We also know its importance to Biscayne Bay. This is why our CBO has fought for so many years in an attempt to reconnect the fresh water flow to the Southern Biscayne Bay. We are now at a critical state, as our Southern bay is dying, with a nearly 70% sea grass die off just in the last few years. Luckily, the Federal, State, and County have taken note and have identified mangrove wetland restoration areas that can help reconnect the flow, some of which include habitat adjacent to coastal and western edge farm lands. This is a great opportunity to replenish the Souther Bay with naturally flowing clean water, while recharging our water lens and wells with fresh water by maintaining our green spaces.

When these mangrove wetland restoration areas are realized, it should also expand habitat for all sorts of endangered species, while naturally protecting us from storm surges and sea level rise. The adjacent agricultural lands will truly serve as the buffer lands needed to further recharge your fresh water while buffering human activity from the restored habitat areas. This leads me to the situation at hand and why more than ever, buffer lands are so important to the health and security of Biscayne Bay and our fresh water supply.

Miami Dade county recently completed a study related to the Urban Expansion Areas within our CDMP-Comprehensive Development Master Plan. Within that study, it clearly details how we as a county have plenty of unused commercial land within the urban development boundary for development and densification. More specifically, it highlights some of the guiding principals within the Resilient 305 strategy where transit corridors can be further developed to help spurn business activity, affordable housing development and further advance logistics and tech hubs near and around key public transit corridors. To that end, Miami-Dade County is currently seeking comments on a report related to the County's Urban Expansion Areas.

The report responds to Comprehensive Development Master Plan (CDMP) Policy LU-8J which was adopted by the Board of County Commissioners on July 22, 2020. The policy directs completion of a study that addresses the following:

(i) additional areas that may be identified as urban expansion areas, with a goal of replacing the 1,993 acres that were proposed for removal in Application No. 5 of the Evaluation and Appraisal Report Amendments in the May 2019 CDMP Amendment Cycle; and

(ii) potential additional uses that would be appropriate for the Urban Expansion Areas, particularly near the Homestead Air Reserve Base.

It is clear that Miami-Dade county has concluded that we have plenty of developable land within the Urban Development Boundary. The report clearly concludes this fact. To that point, you can view the draft report and provide comments at the Miami-Dade County Department of Regulatory and Economic Resources website. Comments received on or before April 15, 2021 will inform the final report. Comments can be submitted to UEAStudyComments@miamidade.gov.

Additional Context:

- The UDB-Urban Development Boundary application for Industrial use is near HARB-Homestead Air Reserve Base.
- The Miami Dade County Board of County Commissioners recently passed a resolution to allow for a small "fixed base operator" that would cater to private planes on HARB-Homestead Air Reserve Base.
- The HARB has a long runway that can be used for large freight operations.
- The application request is in excess of 800 Acres on the Southern Tier agricultural area that is only 447.85 Acres of zoned industrial farm land. It is adjacent to a Wetland Preserve and CERP-Comprehensive Everglades Restoration plan area.
- Lloyd Miller, the father of Biscayne Bay National Park, fought hard to prevent further freight commercialization of the Southern Bay, specific to Homestead Air Force Reserve Base, because of the negative repercussions it would have on wildlife and the general environment.

Table 2.2
Projected Absorption of Industrial Land
Miami-Dade County, Florida 2020 - 2040

Analysis Tier*	Vacant Industrial Land 2020 (Acres)	Industrial Land in Use 2020 (Acres)	Avg Annual Absorption Rate 2020-2040 (Acres)	Projected Year of Depletion
North Tier	1,127.46	3,510.10	30.24	2040+
North Central Tier	983.02	8,230.00	48.80	2040+
South-Central Tier	102.38	949.30	10.15	2030
South Tier	447.85	637.30	5.11	2040+
Countywide	2,660.71	13,326.70	94.30	2040+

Source: Miami-Dade County, Department of Regulatory and Economic Resources, Planning Division, Research Section, December 2020.

* A map of the Analysis Tiers can be found on Appendix Page 22 of this report.



(above)Area of vacant land showcased in red box. (right) Red circle highlights the farmland being proposed for a commercial logistics hub.

Agricultural & Aquifer Context:

- 2010 MDC study shows that Agricultural lands must remain above 52,000 Acres to remain a viable agricultural area. We are already very close to that minimum threshold, which negatively impact the financial viability of the agricultural area. Reducing the agricultural area negatively impacts our food security and our food economy.
- Agricultural lands along the UDB-Urban Development Boundary act as wildlife natural buffer lands and fresh water recharge areas for our groundwater, fresh water wells, and aquifer to help stave off salt water intrusion.
- The Southern Tier Agricultural lands in question are adjacent to the South Dade Wetland Preserve, part of the CERP-Comprehensive Everglades Restoration plan. Further industrialization could negatively impact CERP.
- If Southern Tier Agricultural lands in questions are rezoned and developed for a large scale industrial use, the buffer lands will have been eliminated which are against CERP guidelines and the Department of Interior guidances.

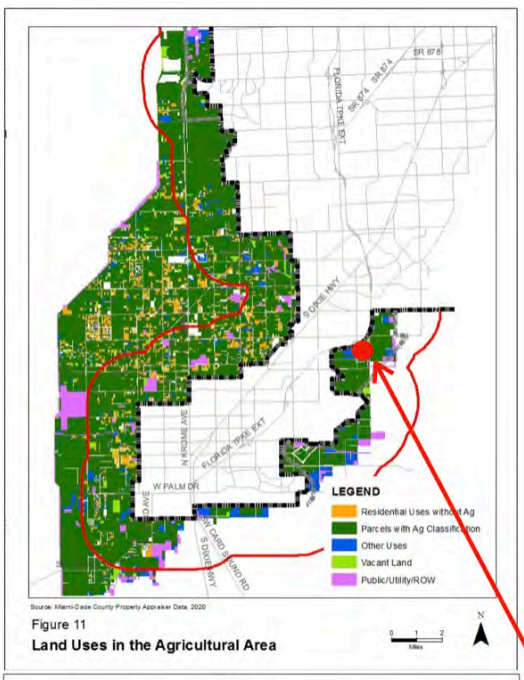


Figure 11
Land Uses in the Agricultural Area

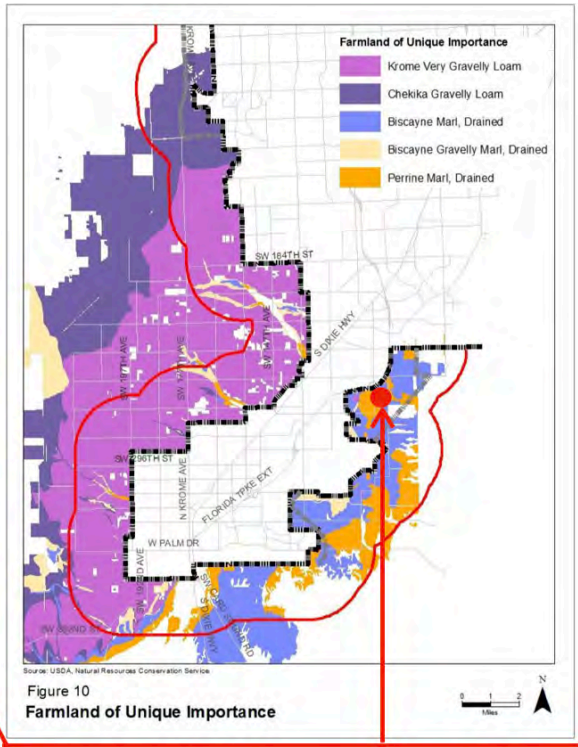


Figure 10
Farmland of Unique Importance

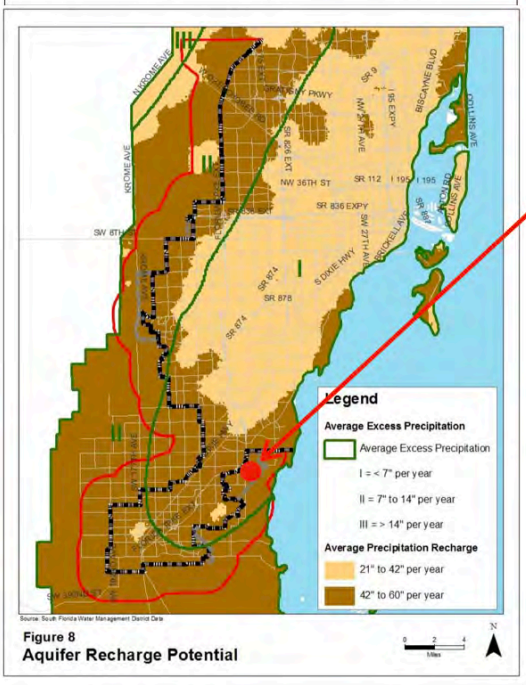


Figure 8
Aquifer Recharge Potential

CDMP Ammendment for rezoning of agricultural land and land outside of the UDB for large scale industrial use.

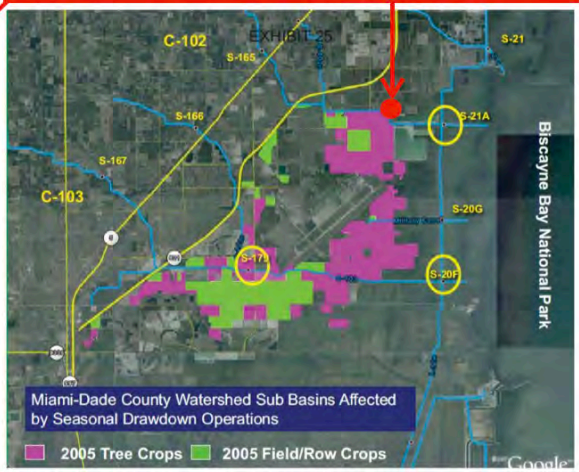


Figure 14: Watershed Sub Basins Affected by Seasonal Drawdown
Source: South Florida Water Management District (2005)

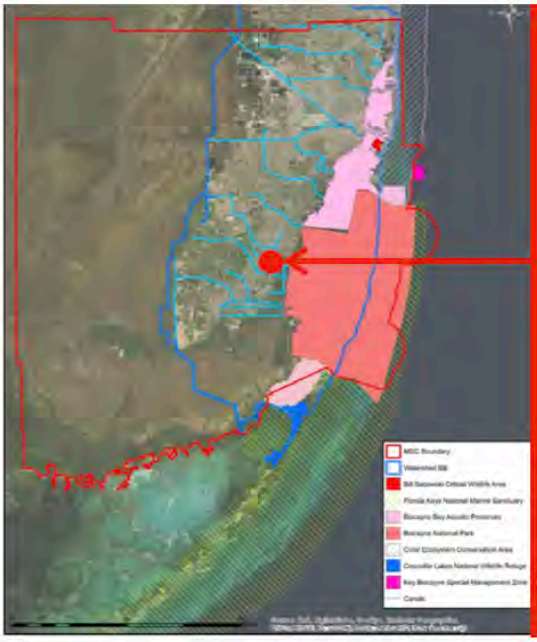
Miami-Dade Biscayne Bay Task Force Recommendations

WATERSHED HABITAT RESTORATION AND NATURAL INFRASTRUCTURE

4A	Develop ecologically acceptable living shoreline design options that are consistent with the existing Biscayne Bay Aquatic Preserve Act	Immediate (I)
4B	Raise awareness of the value of mangroves through a homeowner education campaign	Short-Term (S)
4C	Increase enforcement of existing rules for protecting existing mangroves and mangrove shorelines	Short-Term (S)
4D	Identify vulnerable properties along the coastline and partner with municipalities to focus on public properties and private property owners to create a voluntary Mangrove Protection and Restoration Zone Program	Short-Term (S)
4E	Prioritize existing and identify new green and blue infrastructure approaches and restoration projects	Immediate (I)
4F	Continue to work with SFWMD and to have the State of Florida allocate the funds necessary to ensure the timely commencement of construction of the Cutler Flow Way in accordance with the project timeline in the Integrated Delivery Schedule	Immediate (I)
4G	Continue to advocate for funding to support the Biscayne Bay Southern Everglades Ecosystem Restoration (BBSEER) project (also known as the BBCW / C-111)	Mid-Term (M)
4H	Establish seagrass targets and maintenance requirements	Short-Term (S)
4I	Accelerate green infrastructure solutions for flooding, resiliency and water quality	Short-Term (S)

WATER QUALITY

		BENCHMARK
1A	Establish science-based, pollutant load reduction goals and interim targets	Short-Term (S)
1B	Develop, implement and continuously monitor and demonstrate progress toward meeting 1A's pollutant load reduction goals and interim targets	Short-Term (S)
1C	Activate additional Department of Regulatory and Economic Resources' (RER) resource management functions	Immediate (I)
1D	County should conduct an immediate assessment of land-based hotspot areas prioritized based on existing, known impairments	Immediate (I)
1E	Review, develop (as needed), implement and enforce local ordinances and policies to attain pollution load reduction goals set forth in the Watershed Restoration Plan (WRP)	Short-Term (S)
1F	Coordinate, staff and provide an annual budget for comprehensive, centralized Biscayne Bay Watershed data and research coordination and data management infrastructure	Immediate (I)
1G	Undertake and secure funding for new pilot projects and research projects focused on reducing pollutant loads	Immediate (I)
1H	Elevate and further amend the Comprehensive Develop Master Plan (CDMP) to further include Biscayne Bay watershed management planning elements	Mid-Term (M)
1I	Conduct a climate change vulnerability assessment for Biscayne Bay	Short-Term (S)
1J	Initiate and fund studies that illuminate specific knowledge gaps for application toward watershed restoration	Immediate (I)
1K	Pass a county-wide fertilizer ordinance	Short-Term (S)
1L	Increase compliance of all marinas and commercial operations along waterways	Immediate (I)
1M	Continue to monitor the progress of the October 7th, 2015 Consent Agreement between FP&L and Miami-Dade County	Immediate (I)



Converting 447.85 Acres of Agricultural land & moving the UDB by another 400 + Acres for a large scale Industrial logistics hub will negatively impact the CERP by reducing freshwater recharging & natural buffer lands adjacent to protected wetlands, which goes against several BBTF Recommendations * See Above

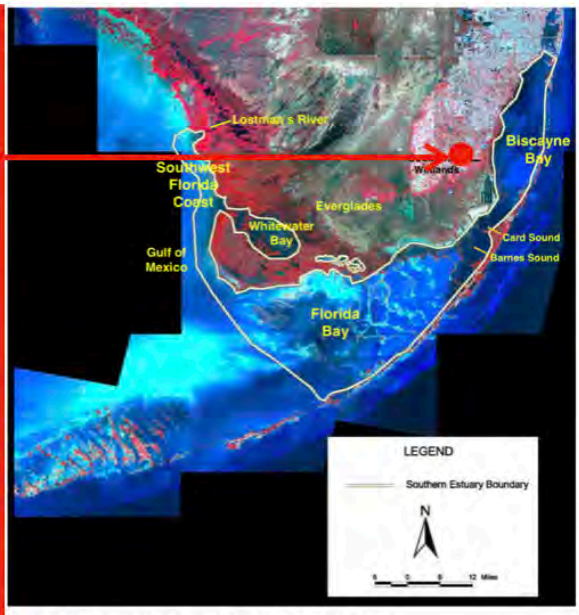


Figure 3-22: Southern Estuaries within the Influence of CERP

In closing, jobs and opportunity are critical, but they are not mutually exclusive to maintaining our natural resources, supporting a vibrant environment, where a quality of life and livability can be enjoyed by all. The environment is the economy and we need 21st century jobs that truly value it as the foundation of economy and life. As the report finds, we are not at odds with maintaining our urban development boundary, maintaining and bolstering our agricultural lands, and expanding development, and in so jobs, within available industrial lands inside the UDB, and helping to realize the CERP, while restoring our environment and protecting our natural wonder that is Biscayne Bay; only then will the Environment truly be the economy.

Atlantic Civil, Inc.

15600 SW 288 Street, Ste 310, Homestead FL 33033 ■ 305-670-9610

April 19, 2021

Mayor Daniella Levine Cava
111 NW 1st Street, 29th Floor
Miami, FL 33128

Dear Madame Mayor,

The following are in response to the Miami-Dade County Department of Regulatory and Economic Resources Draft Urban Expansion Area (UEA) Report respondent to Comprehensive Development Master Plan (CDMP) Policy LU-8J adopted by the Miami Dade County Board of County Commissioners last year. The policy directs completion of a study addressing the additional areas that may be identified as UEA's, with a goal of replacing the 1,993 acres that were proposed for removal in Application No. 5 of the Evaluation and Appraisal Report Amendments in the May 2019 CDMP Amendment Cycle.

As a longtime property owner in South Miami Dade County, I have a vested interest in which land is chosen next to be developed. I believe the County should avoid Coastal High Hazard Zones or at least have them low on the priority list, when pursuing future development generally to ensure we are locating our future developments in the areas best suited now to address the impacts from Sea Level Rise and storm surge.

Please consider adding to the Study Area our property south of SW 352 Street and north of SW 360 Street between SW 167 Ave. and SW 147 Ave. as a proposed New Urban Expansion Area (UEA). The majority of this property in this area is ***not a wetland and is not deemed Costal High Hazard Zone.*** *The property is within the municipality of the City of Florida City. The area south of this area has been permitted for rock mining, thereby limiting the ability of the UDB to be expanded future south. CERP and endangered species issues were thoroughly addressed during the mining permitting process and do not affect same. The area is in an AH (elevation +4.0 from FIRM map) or X (No elevation required) flood zone. Most importantly, our areas within this proposed UEA expansion area are at elevation +4.7 ft. Utilities are available from either Homestead or Florida City.*

We believe these unique features ***of this "portion" of Area 4 meet the highest suitable UEA criteria*** *and should be included in the UEA at this time, if not placed at the top of the list.*

For all of the above, I would urge you to add the area shown on the attached exhibit.

Please contact me with any questions.

Steve Torcise Jr.
President
Atlantic Civil, Inc.

Cc: Murley, James (RER) james.murley@miamidade.gov, Vazquez, Jeannette (Office of the Mayor) Jeannette.Vazquez@miamidade.gov Sean McCrackine(Office of the Mayor) sean.mccrackine@miamidade.gov, Bell, Jerry (RER) Jerry.Bell@miamidade.gov UEAStudyComments@miamidade.gov, Otis Wallace - flcitymayo@aol.com, Commissioner Kionne McGhee – District 9 (Jorge.Abreu@miamidade.gov

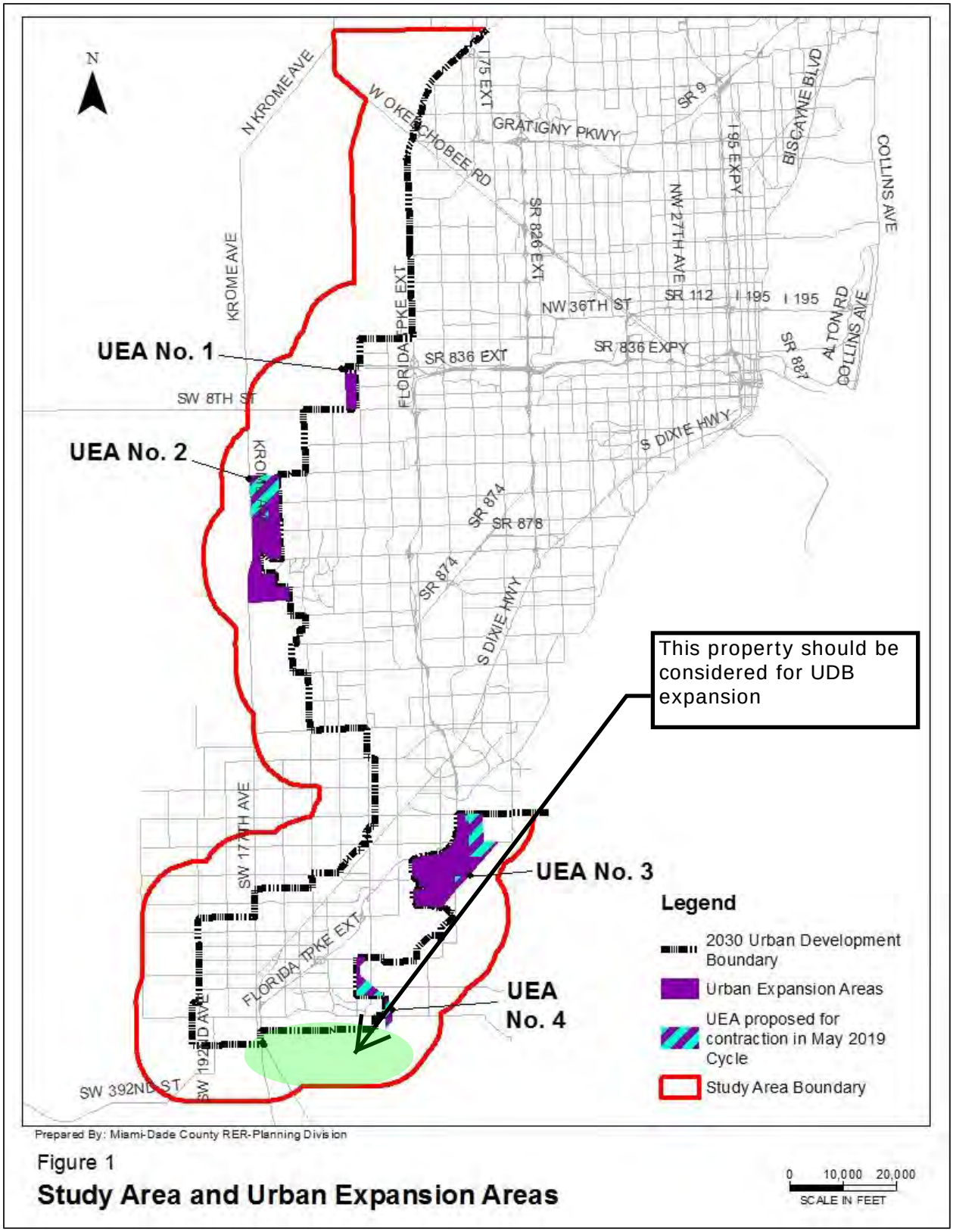


Figure 1

Study Area and Urban Expansion Areas

Everglades Coalition

1000 Friends of Florida
Angler Action Foundation
Audubon Florida
Audubon of Southwest Florida
Audubon Western Everglades
Audubon Everglades
Backcountry Fly Fishers of Naples
Calusa Waterkeeper
Cape Coral Friends of Wildlife
Center for Biological Diversity
Conservancy of Southwest Florida
Defenders of Wildlife
"Ding" Darling Wildlife Society
Earthjustice
Environment Florida
Everglades Foundation
Everglades Law Center
Everglades Trust
Florida Bay Forever
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
Lake Worth Waterkeeper
Last Stand
League of Women Voters of Florida
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
Peace River Audubon Society
Reef Relief
Sanibel-Captiva Conservation Foundation
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
South Florida Audubon Society
Southern Alliance for Clean Energy
The Florida Wildlife Federation
The Institute for Regional Conservation
The National Wildlife Federation
Theodore Roosevelt Conservation
Partnership
Tropical Audubon Society

April 19, 2021

Via e-mail: UEAStudyComments@miamidade.gov

RE: DRAFT UEA STUDY COMMENTS

Dear Assistant Director Bell,

We submit the following comments on behalf of Everglades Coalition, an alliance of 61 local, state and national conservation and environmental organizations dedicated to full restoration of the greater Everglades ecosystem, from the Kissimmee Chain of Lakes into Lake Okeechobee, through the "River of Grass," out to Florida Bay and Biscayne Bay. The Everglades is widely recognized as one of the world's most unique and spectacular natural wonders, and Florida has a compelling interest in protecting and restoring the ecosystem due to its tremendous economic and ecological value.

Our comments are in response to the Miami-Dade County Department of Regulatory and Economic Resources Draft Urban Expansion Area (UEA) Report respondent to Comprehensive Development Master Plan (CDMP) Policy LU-8J adopted by the Miami Dade County Board of County Commissioners last year. The policy directs completion of a study addressing the additional areas that may be identified as UEA's, with a goal of replacing the 1,993 acres that were proposed for removal in Application No. 5 of the Evaluation and Appraisal Report Amendments in the May 2019 CDMP Amendment Cycle, as well as potential additional uses that would be appropriate for the Urban Expansion Areas (UEA), particularly near the Homestead Air Reserve Base (HARB).

It is important to recognize that no developable land would actually be lost from the proposed contractions outlined in the May 2019 CDMP Amendment Cycle, as these areas all fall within the "shall be avoided" categories which the county has identified as unsuitable for development, including the Bird Drive Wetlands, land falling within Comprehensive Everglades Restoration Plan (CERP) boundaries, land within the Homestead Air Reserve Base accident zone, and land falling within the Coastal High Hazard Area.

The report recommends that no additional UEA's be designated at this time, as there is sufficient residential and industrial development capacity within the UDB to accommodate projected population growth beyond 2040, far beyond the county's short and long-term planning horizons. The report goes on to note that even with the exclusion of non-developable land as recommended under Application 5, there are approximately 2,000 acres within the remaining UEAs 1-4 that may be suitable for industrial and residential development. **We fully support the recommendations of this study.**

However, the study considers two study areas, area 1a in the Northern Lake Belt, and area 3a in the Redland Protection Area. There is no need at this time to expand the UDB or add additional land into the UEA footprint, but the following comments address the study areas:

Study Area (1a) Northern Lake Belt

Study Area 1a should not be considered at all for designation as a UEA Study Area. 1a is located south of NW 170th Street, adjacent to land designated for CERP purposes. The area is bounded by CERP project areas (Specifically the CERP North Lake Belt project area) and are wetlands of regional significance, and both present and future wetlands are planned here.

The North Lake Belt Storage Area project—an in-ground 90,000 acre-foot capacity storage reservoir made up of canals, pumps, and water control structures designed to transport water for restoring southern Biscayne Bay, northeast Florida Bay, and the adjacent wetlands. The project is scheduled for completion in 2035 and is sponsored by the U.S. Army Corps of Engineers (USACE) and the South Florida Water Management District (SFWMD). In 2020, the USACE began the Project Implementation Report process as part of the Biscayne Bay and Southeastern Everglades Ecosystem Restoration (BBSEER) project of CERP and will be focusing specifically on the water delivery potential from this area to Biscayne Bay and Taylor Slough.

The success of CERP projects delivering water to Biscayne Bay has never been more critical. In August of 2020, Biscayne Bay suffered a major fish-kill event[1]. The recurrence of a separate fish kill event in early October has lent ever more credence to concerns that events of this type may become recurrent unless distributed freshwater inputs can be increased and nutrient inputs into the system reduced dramatically[2].The Bay currently stands at the virtual brink of collapse as a result of eutrophication and looming seagrass die-offs.

The Urban Development Boundary Is Critical to Protecting Restoration Investments

The UDB was incorporated into the CDMP Land Use Plan map in 1983 out of specific recognition of the fact that land falling on the county periphery is generally unsuited to new development and contains valuable natural and agricultural resources.

The major objectives of the UDB are as follows:

1. Protect agriculture as an economically viable industry
2. Protect environmental resources, wellfields (drinking water supply), and wetlands
3. Protect areas designated for limestone and mineral extraction
4. Work in conjunction with other CDMP growth policies to conserve natural resources and prevent sprawl development
    a. Promote infill and urban center development
5. Facilitate efficient delivery of public services and infrastructure

Miami-Dade County faces unique challenges in managing its urban growth. The narrow strip of elevated land which runs through the center of the county is bounded by low lying, flood prone land which provide the basis of our agricultural economy and buffers two national parks, the Everglades and Biscayne Bay, areas that are of significant importance to the South Florida community and are afforded exclusive protections accordingly.

[1] Thousands of fish turn up dead in Biscayne Bay. FWC will test water for algae blooms. Adriana Brasileiro. 08/11/2016. Miami Herald.

[2] Dead fish have been reported northern Biscayne Bay. Miami Waterkeeper is investigating, KARINA ELWOOD, 10/03/2020, Miami Herald

Both the study areas investigated in the report contain a mix of the assets which county planners intended to preserve or avoid development outside the UDB, including valuable agricultural land, native habitat, and safety considerations. If UEA expansion was approved, the newly-proposed UEAs would conflict with ongoing projects for the Comprehensive Everglades Restoration Plan (CERP) and would lead to further degradation and loss of farmlands and wetlands in unincorporated Miami-Dade County. Wetland systems serve numerous essential functions, including filtration and purification of surface and groundwater, direct recharging of water to the Biscayne Aquifer, providing habitat for wildlife, and natural attenuation of flood impacts.

Everglades and the Economy

Tens of thousands of jobs are supported by a healthy Everglades in Florida's multibillion-dollar tourism, boating, real estate, recreational and commercial fishing industries:

• Nearly eight million people –about one-third of Florida's population– depend on the Everglades for their daily water supply.
• 1.6 million Florida jobs depend on tourism.
• 114,898 jobs supported by the recreational saltwater fishing industry, and contributed $8 billion to the state's economy in 2014.2
• 14,000 jobs supported by Florida's freshwater fisheries, contributed an additional $1.7 billion economic impact in 2014.
• 86,000 jobs supported by the commercial seafood industry in 2017. Florida is second in the nation when it comes to highest sales, income and value-added impacts with $19.6 billion in sales impacts.
• In 2017, U.S. fisheries supported 1.74 million jobs and contributed $244 billion in sales, with 40% of all recreational fishing trips taken in Florida.
• Florida's waterways have been impacted by recurrent harmful algal blooms and seagrass die offs that have damaged local economies and businesses, harmed wildlife, and threatened human health and safety.

For the reasons stated above, we recommend that the county retract the 1,993 acres proposed in Application 5 but not expand the UEA's at this time. There is no need to expand the UDB at all to meet projected development demands over the next 20 years.

We ask instead that the county continue to study area 3a, although area 1a should be discounted entirely due to its proximity to important CERP projects and wetlands. Area 1a's proximity to the transit corridor makes it arguably better suited for development than other lands designated as UEAs that are in close proximity to the Everglades. As such, this area should be considered as an option before any other UEA is added to the UDB.

Sincerely,



Mark Perry, Co-Chair



Marisa Carrozzo, Co-Chair

CC:
Mayor Daniella Levine Cava
mayor@miamidade.gov

Lourdes Gomez
Director, Department of Regulatory and Economic Resources
lourdes.gomez@miamidade.gov

Jerry Bell
Assistant Director of Planning, DRER
jerry.bell@miamidade.gov

Commissioner Oliver G. Gilbert, III
district1@miamidade.gov

Commissioner Jean Monestime
district2@miamidade.gov

Commissioner Keon Hardemon
district3@miamidade.gov

Commissioner Sally A. Heyman
district4@miamidade.gov

Commissioner Eileen Higgins
district5@miamidade.gov

Commissioner Rebeca Sosa
district6@miamidade.gov

Commissioner Raquel A. Regalado
district7@miamidade.gov

Commissioner Danielle Cohen Higgins
district8@miamidade.gov

Commissioner Kionne L. McGhee
district9@miamidade.gov

Commissioner Javier D. Souto
district10@miamidade.gov

Commissioner Joe A. Martinez
district11@miamidade.gov

Commissioner Jose "Pepe" Diaz
district12@miamidade.gov

Commissioner René Garcia
district13@miamidade.gov

Brown, Kimberly (RER)

From: ATT Inc. <stevenleidner@att.net>
Sent: Monday, April 19, 2021 5:50 PM
To: UEA Study Comments (RER)
Subject: UEA Study

Director Jerry Bell,

I am writing to comment on the Miami-Dade County Department of Regulatory and Economic Resources Draft Urban Expansion Area (UEA) Report in response to the Board of County Commissioners' adoption of Policy LU-8J into the Comprehensive Development Master Plan (CDMP) last year. The policy directs completion of a study addressing the following:

- Additional areas that may be identified as urban expansion areas, with a goal of replacing the 1,993 acres that were proposed for removal in Application No. 5 of the Evaluation and Appraisal Report Amendments in the May 2019 CDMP Amendment Cycle, and
- Potential additional uses that would be appropriate for the Urban Expansion Areas, particularly near the Homestead Air Reserve Base.

No developable land was actually lost from the proposed contractions in the May 2019 CDMP Amendment Cycle, so there should be no need to recoup acreage for reductions unless no other alternative exists. At this time we do have other alternatives, please pursue those and keep our current boundaries in place and focus our tax dollars on infrastructure investments we so desperately need.

The proposed UEAs conflict with future projects for the Comprehensive Everglades Restoration Plan (CERP) and they would lead to further degradation and loss of farmlands and wetlands in unincorporated Miami-Dade County. Given what we are facing we should be in a NO NET LOSS OF GREENSPACE MODE as a county.

As the study points out, there are 4,660 available acres total and an additional 2,000 acres for accommodating future residential growth within the Urban Development Boundary (UDB) that would allow for development beyond 2040. If there is no sensible or verifiable need to utilize the current UEAs, then the County should rely on the available acreage that exists inside the UDB and existing UEAs 1-4
and not expand them at this time.

If and when there is a demonstrable need to add acreage and create a new UEA, this would be best located in an area closest to existing infrastructure. Study Area (3a) would allow residents to utilize public transportation, whereas Study Area (1a) would not. We are opposed to Study Area (1a) as its footprint would conflict with projects for CERP and with mining operations in the Northern Lake Belt.

Thank you for your departments excellent work on this report, and I hope you will take my comments into consideration when moving forward with your final report and your recommendations to the Commission.
Sincerely,
Steve Leidner,Conservation Chair Miami Sierra Club

Sent from AT&T Yahoo Mail on Android

Brown, Kimberly (RER)

From: maryannette robinson <sandyacreredland@bellsouth.net>
Sent: Monday, April 19, 2021 6:04 PM
To: UEA Study Comments (RER)
Subject: UEA Resolution by Comm McGee

No need to remove Ag area to Industrial classification from the county's surplus of existing land —— Important note: the municipality of Homestead has much existing industrial land for development already zoned. The city of Homestead and also Fla City Have a stake in this industrial quest that Commissioner McGee and his developer have for Industrial uses; both cities deserve the industrial benefit, not the county.
Sent from my iPhone

GT GreenbergTraurig

Kerri L. Barsh, Esq.
Telephone: 305-579-0772
barshk@gtlaw.com

April 19, 2021

Mr. Jerry Bell
AICP, Assistant Director for Planning
Miami-Dade County Department of Regulatory and Economic Resources, Planning Division
111 NW First Street, 12th Floor
Miami, Florida 33128
Email: Jerry.Bell@miamidade.gov

Ms. Kimberly Brown
AICP, Supervisor
Long-Range Planning, Planning Division
Regulatory and Economic Resources Department
111 NW First Street, 12th Floor
Miami, FL 33128
Email: Kimberly.Brown@miamidade.gov

Re: Draft UEA Study – Comments by the Miami-Dade Limestone Products Association (the "M-DLPA")

Dear Mr. Bell and Ms. Brown,

I am writing on behalf of the Miami-Dade Limestone Products Association ("M-DLPA") and its four principal rock mining companies, CEMEX Construction Materials Florida, LLC, Titan Florida LLC, Vecellio & Grogan, Inc. (d/b/a/ White Rock Quarries), and Vulcan Materials Company in response to the request by Miami-Dade County Planning Division for public comment on the draft Urban Expansion Area (UEA) Study ("Report"). The draft UEA Report was prepared by the Planning Division at the request of the Miami-Dade County Commission during the Commission's consideration and ultimate approval of the Evaluation and Appraisal Report (EAR) Amendments in the May 2019 CDMP Amendment Cycle. All four of the principal rock mining companies have operations within the statutorily recognized area of Miami-Dade County known as the Miami-Dade Lake Belt region and collectively own more than 27,000 +/- acres (42 square miles) of real property in this region, the vast majority of which is located outside the Urban Development Boundary (UDB) in the Open Lands category of the CDMP.

At the foundation of M-DLPA and the four principal companies is the mining of limestone aggregate using advanced technologies and techniques what will continue to allow Florida to boast the lowest construction costs in the country. This is largely attributed to the fact that Lake Belt limestone is among the most cost-effective in the nation, with Florida's highest quality limestone aggregate sourced directly from western Miami-Dade County. Specifically, the state of Florida uses over 139 million tons of limestone aggregate, 60 million of which is produced in Miami-Dade County alone. As a result, the M-DLPA and the principal rock mining companies support this

same region by providing over 10,000 jobs and contributing $544 million to South Florida workers and businesses.

As rock mining industry leaders, the M-DLPA respectfully submits the following comments for your consideration:

1) Rockmining Considerations. There is a component of the draft Report entitled Policy Considerations, in which rockmining-related issues are discussed. These considerations appear to be based upon and reflective of the information provided by the representatives of the rockmining companies and Florida Department of Environmental Protection as part of the UEA Task Force. The M-DLPA is generally supportive of these considerations and is very appreciative of the significant effort and time made by the Planning Division in incorporating these factors into the draft Report.

2) Recommendation No. 5 of the draft Report – The draft Report recognizes that more than 50% of the State of Florida's needs for construction materials mining are supplied from lands outside the UDB and the M-DLPA members have quarries within the state designated area known as the Lake Belt region. One of the land use policies recommended by the Planning Division is to denote the rockmining that occurs outside the UDB as an asset of regional significance for which the County would maintain land use control and which would not be subject to annexation. As you may recall, the rockmining companies have seen an increasing stream of annexation attempts for the Lake Belt properties over the past several years. Given the fact that the rock mining industry is already heavily regulated and does not currently possess or anticipate in the near future a need for municipal services at any significant level, the M-DLPA *supports* Recommendation No. 5.

3) Recommendation No. 1 of the draft Report – Planning Division staff is not recommending the creation of any new UEAs at this time. But, "once the need exists to identify additional UEAs," Planning staff recommends that the County look to areas with fewer constraints and access to infrastructure. The draft Report identifies two such areas for additional evaluation as possible UEAs – Area 1A (1,398.8 acres) and Area 3A (596.5 acres). The Planning Division also recommends that residential uses should be prohibited in any such new UEA when in close proximity to rockmining. Based upon the information presented to date, the M-DLPA does *not oppose* further evaluation by the County of whether other Subareas meet the criteria for a future, new UEA; provided that the Rockmining Considerations described above are adhered to and any new designation is compatible with their respective real estate holdings in the Lake Belt and does not, in any way, directly or indirectly, impact their currently established property or development rights.

Respectfully submitted,

Kerri L. Barsh

Kerri L. Barsh

April 19, 2021

Via e-mail: UEAStudyComments@miamidade.gov

RE: Urban Expansion Area (UEA) STUDY COMMENTS

Dear Director Jerry Bell,

We submit the following comments on behalf of the Hold the Line Coalition, an alliance of individuals, community groups, businesses, elected officials, and organizations dedicated to responsible and sustainable land management in Miami Dade County. The Coalition sees the need to focus our limited tax dollars on improving Miami-Dade County's current built environment for the better, solidifying our status as a world-class city. By enhancing access to affordable housing, enabling mobility via improved public transportation, protecting our water and ecosystems through accelerated Everglades restoration, sustaining our agricultural industry, and improving infrastructure to protect property and water, we can become truly resilient in the face of climate change.

Our comments are directed towards the Miami-Dade County Department of Regulatory and Economic Resources Draft Urban Expansion Area (UEA) Report, prepared pursuant to Comprehensive Development Master Plan (CDMP) *Policy LU-8J* adopted by the Miami Dade County Board of County Commissioners last year. The policy directs completion of a study addressing the additional areas that may be identified as urban expansion areas, with a goal of replacing the 1,993 acres that were proposed for removal in Application No. 5 of the Evaluation and Appraisal Report Amendments in the May 2019 CDMP Amendment Cycle, as well as potential additional uses that would be appropriate for the Urban Expansion Areas (UEA), particularly near the Homestead Air Reserve Base (HARB).

Our initial comment goes directly to the premise of the policy which directed the study. It is neither realistic nor good planning to insist on completely replacing the 1,993 acres that were proposed for removal from the UEA. As any community grows to maturity and build-out, it is simply not possible, and is contrary to basic urban planning principles, to expect to maintain the same amount of developable land in perpetuity. There is a finite amount of land and water resources in the County and, as acknowledged by the Draft Report, most of the remaining undeveloped land serves important public functions and purposes that the people of Miami-Dade County will require in perpetuity. The natural implications of climate change, sea level rise, the requirements for Everglades Restoration and coastal resilience all suggest narrowing development envelopes and the need for smarter infill development, as the County has acknowledged in the past.

These regionally significant functions are irreplaceable and cannot be lost. To the contrary, as sea level continues to encroach, a growing population requires drinking water, the need for wetlands to protect buildable areas from flooding and recharge lands for water

supply will only increase. The very essence of the Comprehensive Everglades Restoration Project (CERP) as it relates to Miami-Dade County is the restoration of wetlands previously harmed by development and roads. The County can ill-afford to lose any more of them. As the Draft Report explains:

> "The CDMP notes that the most important factors affecting the future viability of these wetland systems will be the ability of Miami-Dade County and the South Florida Water Management District (SFWMD) to maintain more natural water table levels or hydroperiods in these areas; the ability of the U.S. Army Corps of Engineers to recreate a more natural flow of water into the NE Shark River Slough, Everglades National Park and Biscayne National Park; the speed with which biological or other controls for the spread of invasive exotic plant species such as Melaleuca can be found, tested and implemented; and the commitment to wetland management and restoration efforts including the Comprehensive Everglades Restoration Plan (CERP)." Draft Report, p. 10.

In other words, even development that encroaches near to these areas compromises restoration because the presence of that development inhibits the ability of water managers to increase necessary water flows into the Everglades. The recent multi-million dollar curtain wall the US Army Corp of Engineers (USACE) is required to build because of development in the "8.5 Square Mile Area" is a stark example of this problem.

The Staff Report, at pp. 10-26, explains well the sensitivity and importance of all of the lands that are part of the federal-state mission to restore the Everglades and Biscayne bay, and to threatened and endangered wildlife and the County's water supply.

These considerations support the 2017 Miami-Dade County Urban Expansion Area Task Force-recommended contractions of the UEA, without corresponding expansions. As the Draft Report explains:

> "land outside of the UDB **serves important human health, environmental and economic functions** for the County. Decisions regarding where future growth should be accommodated outside of the current UDB requires a balancing of the anticipated benefits of growth against the loss of those functions." Draft Report, p. 4.

In addition, there is good reason for the Draft Report to not recommend targeting lands near the Homestead Air Reserve Base for future urbanization. Doing that would violate the 2001 USAF Record of Decision and subsequent surplus land conveyance to the County, which directed the development of a mixed use development on the former HARB lands, conditioned on an *increase in development restrictions on the surrounding lands* so as to protect the remaining military operations, farmland, wetlands and the Bay.

We urge the commission to reject the framing that the 1,993 acres proposed for re-designation must necessarily be 'replaced'. No developable land would actually be lost

from the contractions proposed in the May 2019 CDMP Amendment Cycle, as these areas all fall within the "shall be avoided" categories which the county has identified as unsuitable for development, including the Bird Drive Wetlands, land falling within Comprehensive Everglades Restoration Plan (CERP) boundaries, land within the Homestead Air Reserve Base accident zone, and land falling within the Coastal High Hazard Area. Inclusion of land within a UEA at no point constituted a guarantee of eventual approval for development. County policy already precluded urban development on this land. As pointed out in the study, there is no pressing need to recoup acreage for these 'reductions'.

The Board should approve the portion of 2019 Application No. 5 that proposed to contract the boundaries of the UEAs. The staff recommendation to remove certain lands from the UEA was well-supported and resulted from months of work and a formal Task Force process—the Miami-Dade County Urban Expansion Area Task Force. To insist on adding a corresponding amount of lands into the UEA at other locations is to insist on ignoring the realities of the diminishing and finite amount of land in the county needed to meet the county's water supply, recreational, ecological and physical needs in perpetuity.

Infill development and the investment in robust public transportation infrastructure in the urban core contained within the UDB, including intense transit-oriented development, offer a superior model for development than the urban sprawl which has historically characterized Miami-Dade County's growth patterns. We ask that the County pursue infill and redevelopment, connected to increased public transit options, and keep our current boundaries in place while focusing our tax dollars on infrastructure investments geared towards the urban core which we so desperately need.

This approach is consistent with the 2019 UEA Task Force decision not to recommend new UEAs, and to recommend that only areas within one mile of a planned urban center or extraordinary transit service be considered.[1] We urge the county to act upon the special report's recommendations that the designation of new UEAs is unnecessary at this time.

The report wisely recommends that no additional UEA's be designated at this time, as there is sufficient residential and industrial development capacity within the UDB to accommodate projected population growth beyond 2040, far beyond the county's short and long-term planning horizons. The report finds that even with the exclusion of non-developable land as recommended under Application 5, there are approximately 4,700 acres within the remaining UEAs 1-4 that may be suitable for industrial and residential development.

Urban Development Boundary Background

The UDB was incorporated into the CDMP Land Use Plan map in 1983 out of specific recognition of the fact that land falling on the county periphery is generally unsuited to new

[1] https://www.miamidade.gov/planning/library/reports/uea-final-report.pdf

development and contains valuable natural and agricultural resources. The major objectives of the UDB are as follows:

1. Protect agriculture as an economically viable industry
2. Protect environmental resources, wellfields (drinking water supply), and wetlands
3. Protect areas designated for limestone and mineral extraction (Rockmining Overlay Area)
4. Work in conjunction with other CDMP growth policies to conserve natural resources and prevent sprawl development
    a. Promote infill and urban center development
5. Facilitate efficient delivery of public services and infrastructure

Miami-Dade County faces unique challenges in managing its urban growth. The narrow strip of elevated land which runs through the center of the county is bounded by low lying, flood prone land which provide the basis of our agricultural economy and buffers two national parks—the Everglades and Biscayne Bay, areas that are of significant importance to the South Florida community and are afforded exclusive protections accordingly.

Specific Comments on the Draft Report

The Draft Report's reasons for not recommending any future consideration of the UEA into most of the geographic areas it analyzed are well-supported, as mentioned above.

Our specific comments will focus on the two areas the Draft Report suggested may at some point be the focus on a UEA expansion if and when the day comes that necessary urban development simply cannot be accommodated anywhere else. The Draft Report considers the designation of two study areas—Area 1a in the North Lake Belt and Area 3a in the Redland Protection Area. The authors suggest that these areas (specifically Area 3a) may be better suited for development than other areas already designated as UEAs.

Both study areas contain some mix of the assets which county planners intended to preserve or avoid development outside the UDB, including valuable agricultural land, native habitat, and safety considerations. If approved, the newly-proposed UEAs would conflict with ongoing projects for the CERP and would lead to further degradation and loss of farmlands and wetlands in unincorporated Miami-Dade County. Wetland systems serve numerous essential functions, including filtration and purification of surface and groundwater, direct recharging of water to the Biscayne Aquifer, providing habitat for wildlife, and natural attenuation of flood impacts.

<u>Study Area (1a) North Lake Belt</u>

Study Area 1a should not be considered at all for designation as a UEA. Study Area 1a is located south of NW 170th Street, adjacent to land designated for CERP purposes. The area is bounded by CERP project areas—specifically the CERP North Lake Belt project area, Wetlands of Regional Significance, and both present and future wetlands.



Figure 1. Study Area 1a

CDMP *Policy CON-7A* sets strict limits on activities that would destroy or degrade Wetlands of Regional Significance. Additionally, CDMP *Policy LU-8G* expressly states that areas falling within CERP project footprints—identified by a Tentatively Selected Plan and/or a Project Implementation Report—shall not be considered for UDB expansion. Figure 3 below displays Wetlands of Regional Significance and the CERP boundaries, which are identified in the CDMP (Page I-88).

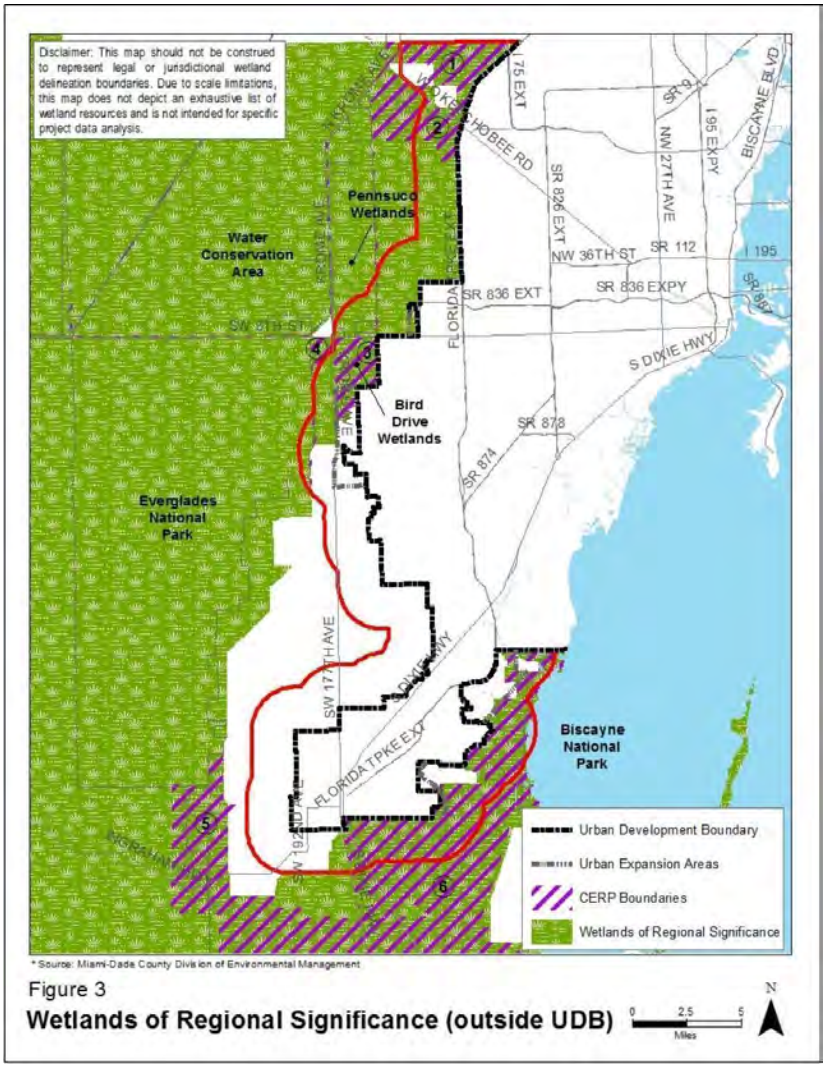


Figure 2. Wetlands of Regional Significance outside the UDB

Location 1 (see Figure 2) identifies the North Lake Belt Storage Area project—an in-ground 90,000 acre-foot capacity storage reservoir made up of canals, pumps, and water control structures designed to transport water for restoring southern Biscayne Bay, northeast Florida Bay, and the adjacent wetlands. The project is scheduled for completion in 2035 and is sponsored by the USACE and the SFWMD. In 2020, the USACE began the Project Implementation Report process as part of the Biscayne Bay and Southeastern Everglades Ecosystem Restoration (BBSEER) project of CERP and will be focusing specifically on the water delivery potential from this area to Biscayne Bay and Taylor Slough.

The success of CERP projects delivering water to Biscayne Bay has never been more critical. In August of 2020 Biscayne Bay suffered a major fish-kill event.[2] The recurrence of a separate fish kill event in early October has lent ever more credence to concerns that

[2] *Thousands of fish turn up dead in Biscayne Bay. FWC will test water for algae blooms*. Adriana Brasileiro. 08/11/2016. Miami Herald.

events of this type may become recurrent unless distributed freshwater inputs can be increased and nutrient inputs into the system dramatically reduced.[3] The Bay currently stands at the virtual brink of collapse as a result of eutrophication and looming seagrass die-offs.

The Biscayne Bay Task force Report issued 3 broad recommendations and over 60 specific recommendations, including recommendation 1H, "to elevate and further amend the Comprehensive Develop Master Plan (CDMP) to further include Biscayne Bay watershed management planning elements".[4] A more overarching recommendation of the task force was to take a watershed level approach to supporting Biscayne Bay health, which includes orienting out planning decisions to maintain a healthy conveyor for freshwater flow from the Everglades to Biscayne Bay.

Rockmining Considerations

State law (§ 373.4149(4), Fla. Stat.) requires all local comprehensive plans located within one mile of the Belt to be compatible with limestone mining activities and that the County strongly considers these activities as well as ancillary operations when modifying local comprehensive plans.

Rock Mining presents major incompatibilities with residential development. Residents of areas adjacent to rock mining operations have reported major distress and disruption of quality of life from the noise associated with operations, as well as material damage to their property in the form of cracks and fissures.[5]

[3] Dead fish have been reported in northern Biscayne Bay. Miami Waterkeeper is investigating, KARINA ELWOOD, 10/03/2020, Miami Herald

[4]https://environment.fiu.edu/research/biscayne-bay-health/_assets/bague-et-al.---biscayne-bay-task-force-report-and-recommendations.pdf

[5] https://www.miamiherald.com/news/local/community/miami-dade/article187589028.html

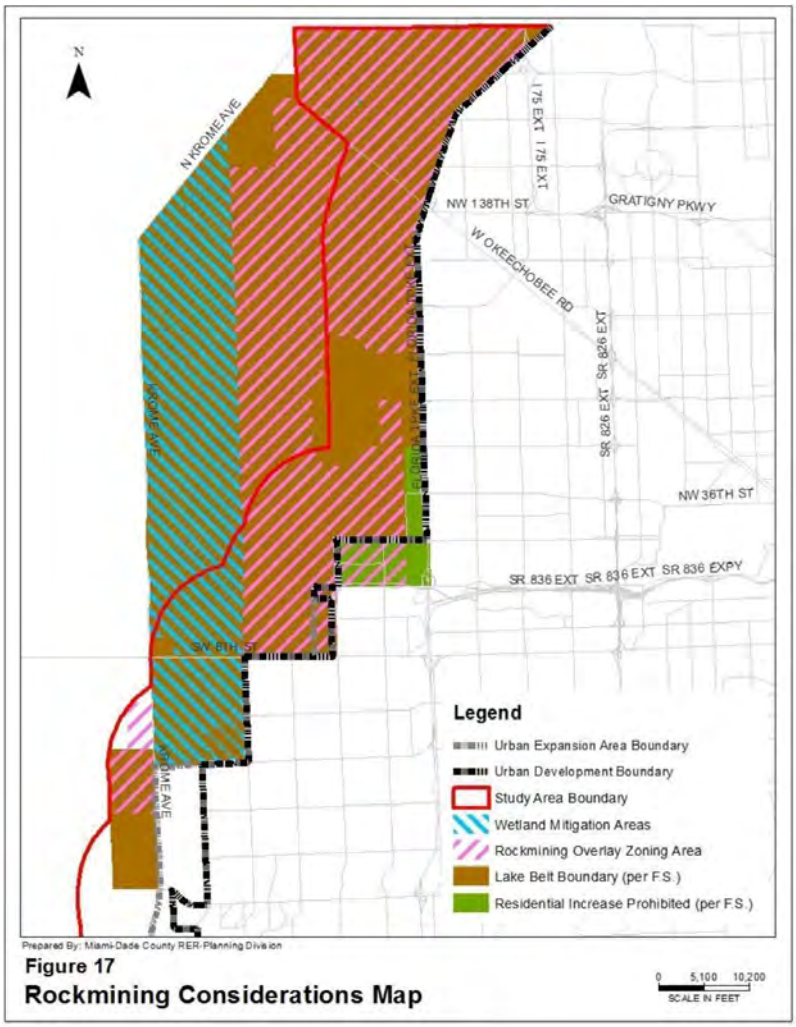


Figure 3. Rockmining Considerations Map

Study Area (1a): Assessment and Recommendations

This study area, shown in Figure 26, encompasses a ±1,398.8-acre area located south of NW 170th Street. Approximately 634 of those acres are within the boundary for the North Lake Belt CERP project which is an area that should be avoided for UDB expansion according to CDMP *Policy LU-8G*. Moreover, CDMP *Policy CON-7A* limits activities allowed in Wetlands of Regional Significance. There is also the issue of Study Area (1a)'s footprint incorporating vacant land which is currently owned by rockmining interests. For these reasons, we do not recommend that Study Area (1a) be designated as a new UEA or even be studied further.

Study Area (3a) Redland Protection Area

Study Area (3a) is a nearly 600-acre area, shown in Figure 4 below. It is the second location which was considered for inclusion as a new UEA by the draft study. The area is within the Redland agricultural area and incorporates a wider area south of SW 184th Street. CDMP *Policy LU-8G* designates the Redland agricultural area as land that shall not be considered for UDB expansion.



Figure 4. Study Area 3A Boundaries

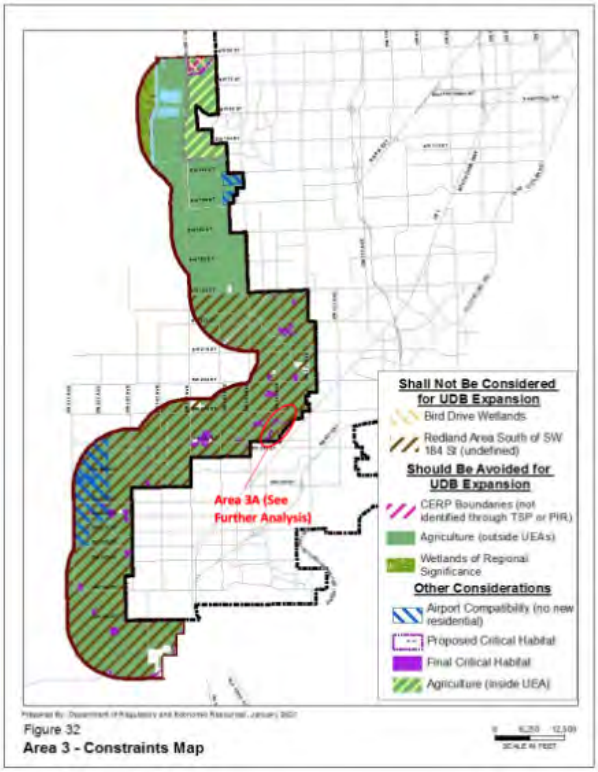


Figure 5. Study Area 3A constraints

Agricultural Production and Economic Viability

Because South Florida's climate allows for year-round production of tropical fruits, vegetables, and other crops, agriculture is an essential part of Miami-Dade County's economy. In fact, the County is second in Florida in terms of market value for agricultural products sold and over 12,000 jobs are supported by this sector. The U.S. Department of Agriculture, Natural Resources Conservation Service has identified roughly 64,287 acres as Farmland of Unique Importance in the "Agricultural Area" of the CDMP Land Use Plan map. Land classified as Farmland of Unique Importance is used specifically for the production of high-value food and fiber crops, providing beneficial agriculture employment opportunities to the County.

Of the total farmland acreage, about 53,000 acres of land currently have exclusive agricultural classification by the Miami-Dade County Property Appraiser (see Figure 6). These areas are particularly important because their soil capacity and land use make them

best suited for agricultural production. Between 2011 and 2019, land with agricultural classification fell by 3,026 acres down to the current total. The Miami-Dade County Planning Division states that a minimum of 52,000 acres of this land are needed to sustain an economically viable agriculture industry, leaving the difference from the current acreage at just 1,000 acres. CDMP *Policy LU-1R* directs the County to reserve the minimum necessary amount of land needed in order to maintain economic viability.

Biodiversity

The area includes pockets of designated habitat for the federally-endangered Bartram's scrub-hairstreak butterfly, native to the rare and ever-shrinking pine rockland habitat native to Dade County. Pine rocklands are an important part of Miami-Dade's ecological heritage. Having once covered Miami-Dade County with over 180,0000 acres of contiguous forest, their range has been reduced to just 3,000 acres. Pine rockland is unique to this region, and recognized by the Florida Natural Areas Inventory as critically imperiled globally.

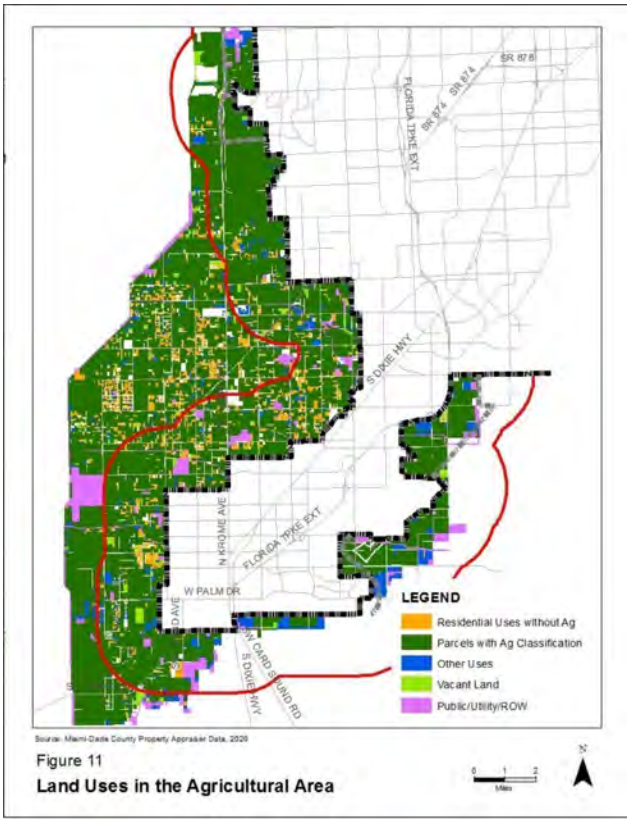


Figure 6. Land Uses in the Agricultural Area Map

Transportation Considerations

The estimates for roadway capacity in the report may be exaggerated due to the models inclusion of capacity improvements associated with the Kendall Parkway extension of State Road 836 as adopted by BCC Ordinance No. 18-109. While the County has approved the project, the project has been deemed incompatible with state and county law by a state administrative law judge.[6] Moreover, the agency that championed this project, the Miami-Dade Expressway Authority (MDX), has been abolished by state law and replaced by the Greater Miami Expressway Authority, *see* Fla. Stat. § 348.001 *et seq.* (repealed), and MDX's challenges to the law have been rejected. *See State of Fla. Dep't of Transportation v. Miami-Dade Cty. Expressway Auth.*, No. 1D19-3653, 2021 WL 1205920, at *2 (Fla. Dist. Ct. App. Mar. 31, 2021). It appears highly unlikely that this project will receive the state land use and wetland permit approvals necessary for its construction. As such, we feel the report should assume that the SR-836 extension project will not come to fruition.

Assessment of Currently Available Alternatives

Both the Urban Expansion Area Task Force Report and the UEA Draft Study Report state there is no need for the inclusion of any additional land into the UDB at this time, let alone expansion of new UEAs. The developable capacity within the UDB extends beyond 2040 for all but the South-Central tier. As such, the UDB as it currently stands more than fulfills the county's obligation to maintain development potential sufficient to accommodate 10 years of population growth. See Table 1 and 2 below:

Table 2.1
Residential Land Supply/Demand Analysis
Miami-Dade County, 2019 to 2040

Analysis Done Separately for Each Type, i.e. No Shifting of Demand between Single & Multifamily Type	Structure Type		
	Single Family	Multi-Family	Both Types
Capacity in 2019	28,581	233,655	262,236
Annual Demand in 2015-2020	4,728	8,391	13,119
Capacity in 2020	23,853	225,264	249,117
Annual Demand in 2020-2025	5,478	5,263	10,741
Capacity in 2025	0	198,949	195,412
Annual Demand in 2025-2030	5,482	5,007	10,489
Capacity in 2030	0	173,914	142,967
Annual Demand in 2030-2035	5,405	4,806	10,211
Capacity in 2035	0	149,884	91,912
Annual Demand in 2035-2040	5,292	4,587	9,879
Capacity in 2040	0	126,949	42,517
Depletion Year	2024	2040+	2040+

Source: Miami-Dade County, Department of Regulatory and Economic Resources, Research and Economic Analysis Section, November 2019.

Table 1. Projected Depletion of Residential Land Supply

[6] https://www.miamiherald.com/news/local/community/miami-dade/article241618056.html

Table 2.2
Projected Absorption of Industrial Land
Miami-Dade County, Florida 2020 - 2040

Analysis Tier*	Vacant Industrial Land 2020 (Acres)	Industrial Land in Use 2020 (Acres)	Avg Annual Absorption Rate 2020-2040 (Acres)	Projected Year of Depletion
North Tier	1,127.46	3,510.10	30.24	2040+
North Central Tier	983.02	8,230.00	48.80	2040+
South-Central Tier	102.38	949.30	10.15	2030
South Tier	447.85	637.30	5.11	2040+
Countywide	2,660.71	13,326.70	94.30	2040+

Source: Miami-Dade County, Department of Regulatory and Economic Resources, Planning Division, Research Section, December 2020.
* A map of the Analysis Tiers can be found on Appendix Page 22 of this report.

Table 2. Projected Absorption of Industrial Land

Draft Report Recommendation No. 1

The Draft Report also provides recommended measures to address potential impacts associated with growth into new Urban Expansion Areas that may be identified in the future. We applaud that effort and make the following suggested edits to the text proposed by staff in the interests of strengthening those recommendations:

It is recommended that any areas identified as Urban Expansion Areas in the future include specific policies to address known constraints such as the following:

- Require densities within the Urban Expansion Area located adjacent to land designated Agriculture on the CDMP Land Use Plan Map that is outside of a designated UEA to be comparable to and compatible with the uses allowed on the adjacent agricultural land.

- Where Natural Forest Communities are located within a proposed Urban Expansion Area, policies should be written into the CDMP that specifically provide for the delineation and of the Natural Forest Communities.

- Include a plan that has been determined by the U.S. Army Corps of Engineers and the South Florida Water Management District to further and not compromise the success or increase the cost of any CERP project and to further and support the relevant CERP project goals and objectives. Such plan shall be separate and in addition to any required compensatory wetlands mitigation.

- Require completion of a threatened and endangered species survey and require full type for type mitigation of impacted wetlands that are utilized by threatened or endangered species to be achieved within areas that can continue to support those species.

- Where a proposed Urban Expansion Area is located within close proximity to active rockmining operations, residential uses should be prohibited.

Conclusion

The Staff Report accurately points out something that UDB expansion proponents never mention:

> Adequate countywide development capacity is maintained within the UDB by *increasing development densities or intensities inside the UDB*, or by expanding the UDB. Draft Report, p. 2.

In fact, CDMP *Policy LU-8F* prioritizes density and intensity increases within the UDB as the means of accommodating population increases. The need to use land more efficiently is reflected in the following staff recommendation:

> "A closer look at the current residential land uses in the County shows that townhome development is underrepresented within the single-family category, comprising only six percent. With its lower land costs, townhome-type development provides an important housing option for moderate income families. The County should aim to strategically increase the diversity of housing options, focusing primarily within the UDB, while maintaining the character of established neighborhoods." Draft Report, p. 4.

The County is not required to expand the UDB in order to accommodate future growth. The County should complete the process of approving 2019 Application 5 to contract the UEA. With the proposed contractions, there would still be at least 4,725 acres within the UEA. That is still a lot of land, and as the Report explains:

> "The recommendations provided in this report are underpinned by analysis demonstrating that the UDB and UEAs, including proposed contractions, are sufficient to accommodate long-term population growth." Draft Report, p. 4.

The Draft Study makes clear that there is no need to replace the UEA contractions for many years into the future. Draft Report, p. 4.

The lands removed from the UEAs under *Policy LU-8J* were not developable, and their original inclusion within the UEA boundaries was made prior to the passage of CERP, and at a time when the natural resource values and development constraints of these areas were not adequately understood. County policy had already long since precluded the possibility of development in the areas removed. As such, the removal of their UEA designation should not be considered grounds to justify the inclusion of new land.

The designation of a new UEA should not be taken lightly. While such a designation does not create development pressure in theory, it has the capacity to set expectations and aspirations among current landowners which do not suit the goals of the county.

For the reasons stated above, we recommend that the county retract the 1,993 acres proposed in Application 5 but not expand the UEAs at this time. There is no need to expand the UDB at all to meet projected development demands over the next 20 years. Even if there were some need to expand the UDB, there are still over 4,700 acres of land existing within the remaining UEAs.

We ask instead that the county continue to study Area 3a, although Area 1a should be discounted entirely due to its proximity to important CERP projects and wetlands. Area 3a's proximity to the transit corridor makes it arguably better suited for development than other lands designated as UEAs. As such, this area should be considered as an option before any other UEA is added to the UDB.

Sincerely,

Laura Reynolds
Coordinator
Hold the Line Campaign

Richard Grosso, Esq.
Board Member
Florida Conservation Voters

Eve Samples
Executive Director
Friends of the Everglades

Jane West, Esq.
Policy & Planning Director
1000 Friends of Florida

Diana Umpierre, AICP, GISP
Chair, Night Sky Conservancy
International Dark-Sky Association Florida

Steven Green, Ph.D.
Former President and Director
Tropical Fruit Growers of South Florida, Inc.

Noel Cleland
Chair
Sierra Club Miami Group

Craig Diamond
Chair, Everglades Committee
Sierra Club Florida Chapter

Adriene Barmann
Vice Chair and Outings Leader
Sierra Club Broward

Paola Ferreira Miani
Executive Director
Tropical Audubon Society

Katy Sorenson
Fmr. County Commissioner, District 8 (1994-2010)
District 8 Resident

Paul Schwiep, Esq.
Director
Urban Environment League

Mary K. Waters
Chair
Redland Community Council (14)

Camila Quaresma-Sharp
Chair, Steering Committee
Biscayne Bay Marine Health Coalition

Yoca Arditi Rocha
Executive Director
The CLEO Institute

Carol Eannace Respondek
President
Collaboration Miami

Allan Respondek
President
Set by Design

Sam Basté
President, Sam Basté Media
District 8 Resident

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Commissioner Martinez
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Commissioner Diaz
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Commissioner Garcia
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Brown, Kimberly (RER)

From: Diana Umpierre, AICP, GISP <diana.umpierre@sierraclub.org>
Sent: Monday, April 19, 2021 7:50 PM
To: UEA Study Comments (RER); Bell, Jerry (RER); Gomez, Lourdes (RER)
Cc: District1; District2 (DIST2); District3; District4; District5; District6; District7; District8; District9; District10; District11; District12; District 13; Cava, Daniella Levine (Office of the Mayor); Email (RER)
Subject: Comments on Draft UEA Report

April 19, 2021

Via e-mail: UEAStudyComments@miamidade.gov

SUBJ: Comments on Draft UEA Report

As a longtime resident of South Florida (over 20 years), I consider Miami-Dade, its natural resources and its people part of my daily life. Because decisions you make will affect me, my neighbors and our children's future, I am submitting the following comments on the Miami-Dade County Department of Regulatory and Economic Resources Draft Urban Expansion Area (UEA) Report, dated March 10, 2021. These comments are also based on my experience working as a geologist, geographer, planner and currently as a grassroots organizer for Sierra Club working to advance ecosystem restoration efforts that lead to an equitable and just Florida Everglades.

I ask you to **keep the current urban boundaries in place and focus on environmentally responsible and climate resilient infrastructure investments, including natural and nature-based infrastructure and ecosystem restoration that Miami-Dade desperately needs within its urban core.** *Let the painful history of the Everglades be a reminder of how costly it is to make wrong decisions* that give in to developer pressure to "build" with little regard to long-term consequences.

Any future proposed UEAs, *which are NOT needed at this time as the draft study report clearly demonstrates*, MUST avoid potential conflicts with Everglades, Biscayne Bay and other ecosystem restoration goals, including climate resiliency goals that favor nature-based solutions versus gray hard infrastructure. We also need the county to lead in the protection of our remaining wetlands and farmlands and in ensuring NO further loss of green and wildlife-friendly habitat. **The proposed UEA contractions in the May 2019 CDMP Amendment Cycle did NOT lead to a loss of developable land as some have incorrectly claimed.**

County must rely on the available acreage that exists inside the Urban Development Boundary (UDB) and existing UEAs 1-4 and not expand them at this time, and that includes a firm NO to the suggested Study Area (1a) as its footprint would conflict with envisioned Everglades restoration projects. Also expanding to areas close to mining operations in the Northern Lake Belt is plainly irresponsible. Miami-Dade residents that live near the existing mining operations already face the constant environmental injustice of vibrations and noise affecting their health, quality of life and their properties, injustices that are the result of similar poor land use decisions.

Miami-Dade children want you to remember that you are stewards of their future. Let's stop stealing from them.

Thank you for the opportunity to comment. ***We are in a climate and species extinction crisis. Now more than ever, we need Miami-Dade County to walk the talk and be the leader we need you to be.***

Respectfully,

Diana Umpierre, AICP, GISP
1105 NW 122nd Ter

Pembroke Pines, FL 33026

Explore, enjoy and protect the planet
Water, Wetlands and Life are Inseparable! #RestoreWetlands

GUNSTER
FLORIDA'S LAW FIRM FOR BUSINESS

Writer's Direct Dial Number: 305-376-6098
Writer's Direct Fax Number: 786-425-4084
Writer's E-Mail Address: mdportilla@gunster.com

April 19, 2021

Via Email Only

Ms. Lourdes M. Gomez, Director
Regulatory and Economic Resources Department Miami-Dade County
111 NW First Street, 29th Floor
Miami, FL 33128

Re: Farmers for Property Rights, LLC Comments to Draft Urban Expansion Area Report/ Dated March 10, 2021

Dear Ms. Gomez:

I represent Farmers for Property Rights, LLC ("Farmers"). Farmers is comprised of property owners who own most of the land in south Miami-Dade, and who currently run the bulk of farming operations in the area. This letter sets forth Farmers comments to the Draft Urban Expansion Area ("UEA") Report/ Dated March 10, 2021 ("Report"). The purpose of the Report was to respond to Resolution No. 81-20, adopted by the Miami-Dade County Board of County Commissioners (BCC) during the discussion of Comprehensive Development Master Plan (CDMP) Application No. 5, prepared by staff, during the CDMP meeting held on July 20, 2020, and pursuant to Policy 8J of the CDMP.

As I stated at the July 20, 2020 CDMP meeting, Farmers firmly believes that the "Redland Area" does not belong under the "shall not be considered" category of policy LU-8G (i) of the CDMP, along with the Northwest Wellfield Protection Area, Water Conservation Areas, areas within the accident potential zones of the Homestead Air Reserve Base. A simple glance at the list of areas under the proposed "shall not be considered" category of policy LU-8G (i) of the CDMP clearly shows why the "Redland Area" should not be under the same category as the other areas on the list.

Please note that the Report does not advance the identification of a boundary for the Redland Area. It is impossible to determine if an area is environmentally or otherwise constrained when you cannot even define its boundaries. Including all land south of Eureka Drive as the "Redland Area" is overbroad, and adversely impacts the property rights of Farmers, and others south of Eureka Drive, who own developable land outside the Urban Development Boundary ("UDB").

Lastly, Farmers would like to express its support for the Builder's Association of South Florida

(BASF) position as expressed in its letter to you dated April 16, 2021. Please see BASF letter attached.

Thank you for the opportunity to present the Farmers' position. We look forward to working with County staff on this continued effort. Should you have any questions, or otherwise wish to discuss, please feel free to contact me.

Sincerely,



Miguel Diaz de la Portilla

MDDLP/ar

cc: Mr. Jerry Bell, Assistant Director, Planning Director
Miami-Dade County Commission Chair Jose Diaz and County Commissioners
Mayor Daniella Levine-Cava

Builders Association
of South Florida
BUILDING GREAT CITIES
SINCE 1944

www.basfonline.org
111 NW 183rd Street, Suite 111
Miami Gardens, FL 33169

April 16, 2021

Ms. Lourdes M. Gomez, Director
Regulatory and Economic Resources Department
Miami-Dade County
111 NW First Street, 29th Floor
Miami, FL 33128

Via email only

Re: Builders Association of South Florida ("BASF") Comments to Draft Urban Expansion Area ("UEA") Report / Dated March 10, 2021 ("Report")

Dear Ms. Gomez:

This letter sets forth the BASF's comments on the above-referenced Draft Report. The purpose of the proposed Report was to respond to Resolution No. 81-20, adopted by the Board of County Commissioners (BCC) during the discussion of CDMP Application No. 5, prepared by staff, during the Comprehensive Development Master Plan ("CDMP") meeting held on July 20, 2020 and pursuant to Policy 8J of the CDMP. Specifically, the purpose of this exercise is to "complete a study of (I) additional areas that may be identified as Urban Expansion Areas, **with a goal of replacing the 1,993 acres that were proposed for removal in Application Number 5 … (emphasis provided).** It is important to note that the Urban Expansion Areas that were depleted were within Urban Expansion Areas 2, 3 and 4, and had been designated for, "Future Development" for over the past 40 years on the County's CDMP Future Land Use Plan map.

Recommendations

Upon review, it appears that the Draft Report's actual **goal was** just the opposite. Rather than review the County with an intent to replace potential expansion lands, the Draft Report concludes that there is no apparent need to make an effort to replace the 1,993 acres. The **BASF respectfully disagrees and makes the following points:**

A. **Recommendation No. 1 of the report does not propose to replace acreage into UEAs 2, 3 and 4 - from which land is proposed to be removed.** Instead, Recommendation No. 1 simply identifies land in UEA 1, once "need exists" and then proceeds to outline why there is no need - and why there won't be a need - for decades (save a significant demand for single-family housing). (Report at p. 94). **This is hardly attempting to meet the requested goal. Rather, just the opposite is proposed.**

B. **Recommendation No. 2** proposes, among other things, that a policy be added to the CDMP which requires that a demonstration that a particular use cannot be accommodated within the UDB and to provide "extraordinary vote requirements" to accomplish the same, a virtual impossibility that hardly meets the stated goal.

C. **Recommendation No. 3** discusses the need for land to accommodate truck parking demands primarily in UEA No. 1. While commercial truck parking is an important need to be addressed, the Report appears to promote that use for UEA No. 1 - which is also the same land the report contemplates, to support potential UEA expansion.

D. **Recommendation No. 4** seeks to "...identify opportunities to increase the diversity of housing options inside the UDB with particular focus on increasing supply of attached single-family housing..." While the BASF supports any effort by the County to expand the residential land supply anywhere, we suggest that policies which effectively replace single family detached densities with townhouse densities does not solve the problem. This recommendation does not consider inherent additional increases in land and construction costs on parcels inside the UDB. Smaller-scale construction has a set of built-in cost drivers, which have not been considered. Given Miami-Dade's chronic housing affordability crisis, a short list includes these points:

- Required homeowner maintenance costs to live in a townhome community usually built with private roads.
- A lack of available infrastructure and subsequent cost to install additional infrastructure.
- Time and cost required to demolish and remove existing buildings on some parcels before construction can begin.

A major issue which continues to remain unaddressed is the fact that, while industrial absorption is appropriately measured using individual tiers and regional data, residential land supply and demand analysis is evaluated on a County-wide basis. This approach to calculating absorption rates results in providing skewed residential demand information. By calculating residential need and absorption on a county-wide basis, this would make a "residential unit" on Brickell Avenue - priced at $1 million – comparable to a "residential unit" priced at $375, 000 in West Miami-Dade. This matter needs to be corrected as soon as possible, to ensure the County Commission receives the most accurate information about residential demand. Correcting this error will more accurately portray the true state of how much land is needed – based on a more accurate calculation of who is buying housing, where and at what price-point.

Again, Recommendation No. 4 does not consider inherent additional construction costs on parcels inside the UDB. Smaller-scale construction has another set of built-in cost driver, which have not been considered and does nothing to address Miami-Dade's chronic housing affordability crisis.

E. **Recommendation No. 5** actually seeks to designate existing land as a "Regional Asset," a new concept that runs directly contrary to the County Commission's stated goal of replacing the 1,993 acres that were proposed for removal in Application Number 5.

F. **Recommendation No. 6** suggests that the Redland boundaries be better defined in order to preserve this largely hobby-farm area. Even though Recommendation 6 calls for a delineation of a southern boundary for the Redland, (report at page 97) no southern boundary is proposed. Instead of providing more certainty for the public, the door is left open for continued public policy debates in the future.

While the Draft Report suggests that there may be acreage numbers within UEA No. 1 may "add up" to the loss of the over 1,900 acres, the areas proposed for future inclusion into a UEA – once a need has been identified – are unsuitable due to multiple drawbacks. While the BASF suggests that the land within UEA No. 1 be considered for UEA expansion, it too is complicated to develop and access. The nearby presence of rock-mining operations alone has impacted the land use decisions in northwest Miami-Dade County for decades.

Conclusion

In conclusion, instead of this important effort being one that clarifies and achieves the desired goal of identifying new UEA acreage, and where our County's future development opportunities should be located, the report:

- Continues to justify the removal of 1,900 acres without replacing them.
- Identifies two areas for "future development" that offer extremely limited options for future development.
- Ignores the single-family land depletion date of 2024 without making any recommendations for future single-family communities; and
- Reduces housing choices for Miami-Dade County residents to townhomes, inside the UDB instead. This would significantly limit the consumer's choices for where and how to live and work.

Rather than adopt a report which offers extremely limited and unattractive options- and little future progress - it is respectfully recommended that the County Commission ask staff to do the following: 1) meet with members of the building and development community who know where the opportunities are, and 2) jointly develop a map based on these opportunities.

BASF looks forward to the opportunity to continue working with County staff on this very important community plan: it's about our future. Thank you for the opportunity to present the Association's views.

Sincerely,

Truly Burton

Ms. Truly Burton
Executive Vice President

cc: Mr. Jerry Bell, Assistant Director, Planning Director
Miami-Dade County Commission Chair Jose Diaz
and County Commissioners
Mayor Daniella Levine-Cava