The following information is provided by

EAR Task Force Member Craig Grossenbacher

(representative of Miami Waterkeeper)

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May 27th, 2026

Kimberly Brown, AICP,
Chief, Long Range and Neighborhood Planning
Miami-Dade County Department of Regulatory and Economic Resources
111 NW 1st Street, Suite 1210
Miami, FL 33128

Re: Miami Waterkeeper Recommendations for the Evaluation and Appraisal Report (EAR) — Miami-Dade County Comprehensive Development Master Plan (CDMP)

Dear Ms. Brown and Members of the EAR Task Force,

Miami-Dade County is in a period of intense development and redevelopment. For much of its history, development projects have typically been one-dimensional and have failed to view the development as part of a holistic county ecosystem. As a result, most developments have missed opportunities for addressing societal challenges alongside project plans. Instead of solving problems, new developments have been placed on top of old infrastructure, increasing paved surfaces, septic tanks, traffic, and more. Instead, we intend that the new revision of the CDMP will utilize development as a driver for solving problems facing the County. Development, with proper strategic alignment, can be a force for good, providing solutions and adding upgrades to our community as new developments come online, such as green spaces, parks, updating wastewater systems, improving water quality, reducing flooding, and greater tree canopy. Miami Waterkeeper's recommendations complement broader community calls to strengthen climate resilience, protect wetlands and the Urban Development Boundary, and direct growth toward existing infrastructure. Our recommendations offer solutions, organized by policy theme, to align around these goals and to move Miami toward a shared resilient future.

Miami Waterkeeper is a science-based non-profit organization dedicated to protecting South Florida's waterways, from the Everglades to Biscayne Bay and the Florida Reef Tract, through science, policy, and community engagement. As Miami-Dade County undertakes the current Evaluation and Appraisal Report (EAR) process to update the CDMP through a 2050 planning horizon, we urge the County to take bold, science-driven action to address the interconnected crises of water pollution, coastal degradation, sea level rise, and increasing land use pressure from urban sprawl. The following recommendations reflect Miami Waterkeeper's ongoing research, monitoring, and advocacy work, and are organized by theme.

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I. Wastewater and Septic System Reforms

1. **Industrial and Sewage Discharge Prohibition.** Miami Waterkeeper recommends that the CDMP be updated to prohibit the discharge of industrial wastewater and sewage effluent, whether treated or untreated, to the surface waters or ground waters of the Biscayne Aquifer for all new construction within those portions of the County where wetlands of regional significance are designated. This measure is essential to prevent additional nutrient and other pollution to groundwater from wastewater systems in environmentally sensitive areas. We further recommend that large industrial developments examine the feasibility of using reuse wastewater to meet the County's reuse goals.

2. **Binding Phased Schedule for Urban Septic Conversion.** Miami-Dade County has more than 108,000 septic tanks, and county-commissioned research found that over 64%, more than 67,000 properties, could experience periodic septic failure by 2040 due to rising groundwater driven by sea level rise. Despite a 1971 commitment to eliminate conventional urban septic tanks, that goal remains unmet. Element V's Sanitary Sewer Subelement must be amended to establish a binding, phased schedule for converting all urban septic systems to centralized sewer connections, with interim milestones, a completion target year, and annual progress reporting. Priority should be set by both proximity to a sewer main, septic vulnerability to sea level rise, proximity to sensitive water bodies, and drinking water wellfields. Financing mechanisms, including low-interest loans, grants, and subsidies for low-income households, should be embedded in Element V and reflected in the six-year capital program of Element IX.

3. **Co-location of utility improvements.** Miami-Dade County should amend the Infrastructure Element of the CDMP to require the co-location of utility improvements whenever public rights-of-way are opened for septic-to-sewer conversions, sewer main extensions, or other wastewater infrastructure projects. The CDMP should establish a policy requiring County agencies, municipalities, and utility providers, including Florida Power & Light (FPL), to coordinate the undergrounding of overhead power lines concurrent with any road-opening associated with sewer construction. This approach is consistent with FPL's existing Storm Secure Underground Program, which replaces overhead neighborhood power lines with underground lines to improve grid resiliency during hurricanes and severe weather.

4. **Septic System Offset Requirement.** For the construction of new or replacement septic systems, the CDMP should require that the developer or property owner either: (a) abandon two existing septic systems within the same municipality for every new one installed, or (b) donate to a county-maintained fund that the County will utilize exclusively to finance septic-to-sewer conversions.

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II. Stormwater Management and Pervious Surface Requirements

5. Enhanced Stormwater Standards. Miami-Dade County should enhance stormwater performance standards and onsite retention, prioritizing low-impact development strategies by requiring applicants to demonstrate that green infrastructure alternatives have been evaluated and, where feasible, incorporated as the means of stormwater management. Specifically, the CDMP should mandate the use of rainwater harvesting systems, reuse, bioswales, and vegetated swales along roadways and parking areas to filter and slow runoff, and permeable or pervious paving materials in surface parking lots, driveways, and pedestrian corridors. These requirements should be codified through amendments to the Land Use and Infrastructure Elements, with complementary zoning overlays applied to critical aquifer recharge zones, wellfield protection areas, and wetland buffers where conventional impervious stormwater systems pose the greatest risk.

III. Water Quality and Pollution Prevention

6. Time-Bound Water Quality Improvement Goals for Biscayne Bay. The CDMP should be amended to require explicit, time-bound water quality improvement goals for Biscayne Bay and its tributaries, tied to the Reasonable Assurance Plan (RAP) currently underway with FDEP. The RAP must include measurable nutrient reduction benchmarks, expressed in total nitrogen and phosphorus loads consistent with Biscayne Bay's Total Maximum Daily Loads (TMDL) requirements, and regular public reporting. New development should showcase compatibility with the Reasonable Assurance Plan (RAP).

7. Waterfront Edge Design Guidelines. Miami-Dade County should amend the CDMP's Coastal Management and Infrastructure Elements to require that all new waterfront development and significant redevelopment of waterfront properties adhere to the Waterfront Edge Design Guidelines (WEDG) standards, as developed by the Waterfront Alliance. WEDG provides a nationally recognized framework for resilient, sustainable, and publicly accessible waterfront design, and its adoption within the CDMP would ensure that waterfront properties do not contribute to the degradation of Biscayne Bay and its tributaries through unmanaged stormwater discharge, hardened shorelines, or loss of marine habitat. Specifically, the County should require WEDG compliance for all waterfront development proposals above a minimum threshold of site area or development intensity, prioritizing green infrastructure features such as nutrient-reducing baffle box systems, rain gardens with native vegetation, permeable hardscape, and living shorelines over conventional seawalls and hardened edges. Miami's own Jose Marti Park on the Miami River, the first WEDG-verified project in Florida, demonstrates that these standards are achievable in a South Florida context.

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Ⅳ. Urban Development Boundary (UDB) Integrity

8. UDB Expansions Threatening Environmental Resources. The CDMP should affirm the UDB as a water quality protection instrument, a flood mitigation tool, and a fiscal responsibility mechanism — not merely a planning line — and expressly link UDB integrity to the conservation goals of Element IV and the infrastructure priorities of Element IX. Growth should continue to be directed to the Urban Infill Area, where water, sewer, and transit infrastructure already exist.

Ⅴ. Wetland Protection

9. Prohibition on Dredging or Filling of Publicly Owned Wetlands Outside the UDB. Miami Waterkeeper recommends that the Conservation Element of the CDMP be strengthened to prohibit any further dredging or filling of publicly owned wetlands located outside the Urban Development Boundary (UDB), except in cases where extreme hardship would result and where all applicable state and federal wetland regulatory requirements are satisfied.

10. In-Basin Mitigation Requirement for Wetlands of Regional Significance. The Conservation Element should further require that all dredging or filling of wetlands designated on the CDMP Wetlands of Regional Significance map be fully mitigated within the same basin as the impacted area.

Ⅵ. Biscayne Bay South Estuary Ecosystem Restoration (BBSEER)

11. Designation of BBSEER Project Areas as Critical Environmental Concern. Miami Waterkeeper recommends that the County declare all areas needed for the BBSEER project that are located outside of the UDB, as defined by the Army Corps of Engineers' Tentatively Selected Plan, as areas of Critical Environmental Concern under Chapter 33B of the County Code.

12. CDMP Amendments to Facilitate the BBSEER Project. The CDMP should be amended to facilitate the Army Corps of Engineers' BBSEER project by incorporating language that:

- Prioritizes the use of undeveloped county-owned and other government-owned parcels within the footprint of proposed BBSEER project features for the construction and operation of this CERP project;
- Modifies or updates any CDMP language that is inconsistent with the implementation of the BBSEER project; and
- Adds policy language to address Miami-Dade County's historical position to certify county-owned lands needed for CERP to the South Florida Water Management District and/or the Army Corps of Engineers.

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VII. Species Habitat Protection

13. Strengthening policies to more robustly protect fish, wildlife, and plant species. Miami Waterkeeper recommends:

- All activities that adversely affect habitat critical to federal, state, or county-designated endangered or threatened species shall be prohibited unless such activity is a public necessity with no feasible alternative site. Critical habitat loss should be mitigated at a ratio of not less than 3:1 (new habitat to impacted habitat), with all mitigation approved by DERM before any permit issuance.
- Require that all nesting, roosting, and feeding habitats used by federal, state, or county-designated endangered or threatened species be protected and buffered from surrounding development, and that no further degradation or destruction of such habitat be authorized.

- Rookeries and nesting sites used by federal, state, or county-designated endangered or threatened species shall not be moved or destroyed and shall be protected from degradation or destruction. At development sites, rookeries and nesting areas shall be incorporated into landscape plans with appropriate permanent buffers of not less than 330 feet to protect them from disturbance. No clearing or other work shall occur within 330 feet during agency-established nesting and when there are active nests. Lighting impacts on listed species nesting or feeding habitat are prohibited.

- Conservation of upland wildlife habitats shall be taken into consideration during development evaluation and permitting processes, and critical habitat shall be protected as well as managed at all times to prevent the growth of non-native exotic vegetation.

VIII. Mitigation for Environmental Impacts

14. Miami-Dade County shall require mitigation for the loss, conversion, or development of lands designated or utilized for parks and recreation purposes. Such mitigation shall occur within Miami-Dade County and shall include the provision of replacement parkland of substantially equivalent or greater acreage, recreational function, accessibility, and public benefit. Replacement parkland shall be located within an appropriate distance of the affected parcel to continue serving the recreational needs of the impacted population and maintain adopted level-of-service standards.

15. Mitigation for all unpermitted environmental impacts where Miami-Dade County is the local sponsor. Miami-Dade County should amend the CDMP to require that the County, in its capacity as local sponsor for state or federal projects, ensure full mitigation for all unpermitted

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environmental impacts resulting from such projects, including impacts to wetlands, seagrass, coral, shoreline habitat, and water quality. The CDMP should explicitly close this gap by establishing a policy that holds the County to the same mitigation standards it applies to private applicants, requiring that any unpermitted environmental impact resulting from a County-sponsored project be fully mitigated at a minimum ratio of 2:1 within the same basin or ecosystem as the impact, and that a mitigation plan be reviewed and approved by the Miami-Dade Department of Environment and Management (DERM).

The recommendations set forth above reflect our ongoing efforts to ensure that the CDMP provides the strongest possible framework for protecting South Florida's water resources, natural systems, and long-term resilience. We welcome the opportunity to discuss any of these recommendations in further detail.

Miami-Dade County sits at the intersection of a climate crisis and a water quality emergency. The decisions embedded in the CDMP over the next planning cycle will determine whether the county charts a path toward genuine resilience or doubles down on development patterns and infrastructure failures that put communities, ecosystems, and the economy at risk. Miami Waterkeeper urges the County to use this EAR process to produce a CDMP that is grounded in the best available science, enforceable in practice, and equitable in its distribution of both burdens and benefits.

Respectfully,



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CEO and Waterkeeper

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Additional information distributed at the June 15, 2026 EAR Taskforce Meeting:

By 2030. require at least 50% of the glass in Miami-Dade County's waste stream to be recovered and used by Miami-Dade County as follows:

crushed glass "landfilling" to raise ground elevations in support of future development including redevelopment of low lying areas

for use in County and other public-works-type infrastructure projects for reuse oft his material, thereby reducing the dependency on limestone fill material (an important and finite resource)

to aid in the filling in of canals and ditches to be eliminated pursuant to resilience projects and CERP projects

for use in County restoration projects to reduce the need to mine sand or limestone from quarries thereby preserving more quarry material for development projects as well as preserving landfill space where glass is currently disposed..