



January 19, 2021

Commissioner Jose Pepe Diaz - Chairman Miami- Dade County Commission

Commissioner Oliver Gilbert III - Vice- Chairman Miami- Dade County Commission

Commissioner Jean Monestime – District 2

Commissioner Keon Hardemon – District 3

Commissioner Sally A. Heyman– District 4

Commissioner Eileen Higgins – District 5

Commissioner Rebeca Sosa – District 6

Commissioner Raquel Regalado – District 7

Commissioner Danielle Cohen – District 8

Commissioner Kione Mc Ghee – District 9

Commissioner Javier D. Souto – District 10

Commissioner Joe A. Martinez – District 11

Commissioner Rene Garcia – District 13

CC. Mayor Daniella Levine Cava

Sean McCrackine – Miami Dade County

Re: Agenda Item 5H – January 20, 2021 – CDMP Code Amendment

Dear County Commissioners:

I am writing on behalf of Tropical Audubon Society, representing residents of Miami Dade County interested in the conservation of South Florida's precious ecosystems. We are writing to strongly express our concern and opposition to the changes proposed to the County's Code regarding the Urban Development Boundary to be voted on January 20th 2021, (Agenda item 5H). The changes proposed in the resolution would disrupt the orderly process in which Comprehensive Development Master Plan (CDMP) amendments are considered, thus threatening the County's long standing protections of the Urban Development Boundary (UDB) and the careful balance between environmental and development interests.

Miami Dade's CDMP is the gold standard to protect the County's agricultural and environmental lands and has been critical to balance competing interests and buffer the Everglades from the urban core. Through the CDMP and the protection of the UDB, the County has demonstrated its leadership and commitment to smart growth, while providing reasonable flexibility through the current CDMP amendment cycle. The proposed resolution would disrupt this cycle, dismantling critical analysis when considering changes to the CDMP and the UDB.

Given the critical role of the UDB, the current rules to propose changes should not be modified. The County Commission needs to be able to analyze the applications in an orderly and comprehensive way, through the established CDMP cycle. Changes to the UDB need to be analyzed with extremely careful consideration of the consequence of the land use changes. The proposed resolution does not allow for this comprehensive and holistic review.



Protecting the integrity of the CDMP and its UDB is essential to defending the County's water resources given the critical role that the Everglades and the agricultural areas play in recharging the Biscayne aquifer. Providing a secure source of water for Miami-Dade residents is a much higher priority than the interests of the limited number of individuals that would benefit from increased flexibility in the CDMP amendment cycle. The UDB protects the County's rare agricultural lands, as well as the Everglades National Park and Biscayne Bay. The proposed resolution will threaten the Biscayne Bay watershed and the implementation of the recommendations from the Biscayne Bay Task Force that were approved by the Commission.

Finally, the resolution also proposes to eliminate existing limitations to UDB amendments and applications that seek to re-designate non-urban uses to other non-urban uses. This proposal would weaken protections for agricultural and environmental uses and should also be rejected. These changes would weaken the protection of land for environmental protection or agriculture use without full consideration. Given the sensitivity and shortage of these lands, proposals to change them deserve the orderly analysis of the current CDMP amendment cycle.

In conclusion, we strongly urge the County Commission to oppose the proposed resolution to amend the County Code and continue to protect the CDMP and its UDB. Our system has served us well and we should retain it.

Respectfully,

Paola Ferreira
Executive Director
Tropical Audubon Society