

November 6, 2023

Miami-Dade County Planning Advisory Board
111 NW 1st Street, Suite 220
Miami, FL 33128

RE: CDMP20230011- TMC Naranja 66 Holdings LLC

Planning Advisory Board Members,

The Hold the Line (HLT) Coalition, an alliance of individuals, community groups, businesses, municipalities, and organizations dedicated to responsible and sustainable land management in Miami-Dade County (MDC), hereby submit the following comments on application CDMP20230011, filed by Naranja 66 Holdings LLC, hereafter “Naranja”.

The HLT Coalition recommends transmitting for more information, but issuing a recommendation of denial for the application due to the lack of need to add land for residential development inside the Urban Development Boundary (UDB).

Proposed CDMP Amendments

Naranja requests several amendments to the CDMP:

- a UDB expansion to include the Application Site and to change the Future Land Use Map from “Agriculture” to “Special District”.
- a text amendment to revise the CDMP Land Use Element “Special District” to create the “Westend at Princeton” District.
- Add three proffered Declaration of Restrictions into the Restrictions Table into Appendix A of the CDMP Land Use Element upon acceptance by the Board of County Commissioners (BCC).

Needs Analysis and CDMP Compliance

Naranja states “The purpose of the Westend at Princeton District (the “Special District”) is to provide affordable residential, multi-family and townhome housing to meet the needs of the underserved Southwest Miami-Dade County region.” Naranja intends to construct 43 residential townhomes and 587 multifamily units along with a small amount of retail space to serve residents’ needs.

In order to demonstrate the need to move the UDB, the applicant must show that there is an insufficient supply of developable land to sustain projected countywide residential demand for a period of 10 years. MDC staff analysis indicates there is a sufficient supply in the area containing this application to meet the 10-year projected residential capacity requirement. **Therefore, Naranja has not demonstrated the requisite need for a UDB expansion.**

The Naranja site also carries multiple designations set out to inhibit the UDB expansions in Policy LU-8G. The land is designated Agricultural Use, is part of the Redland area south of SW 184th St and is not in a designated Urban Expansion Area (UEA). All these designations, combined with a lack of need, should result in a denial of the application to uphold county CDMP requirements.

The site is within a half mile of the SMART corridor and $\frac{3}{4}$ of a mile from a South Dade Transit Way station. In general, locating dense development, especially housing designed to provide affordable options near transit conforms to smart growth principles and MDC policies. If and when there is a need for more housing this type of project should be considered.

Conversion of Agricultural Land

The recently released Agricultural Lands Final Report highlighted the need to maintain until 2030 a minimum of 64,800 acres available for agricultural production to support a viable sector. With very few agricultural acres available to be repurposed without breaching this threshold, extreme caution should be exercised before granting any conversion for other uses.

This application draws particular scrutiny since the site is being actively farmed to produce row crops. Naranja has included a covenant provision to mitigate the loss of agricultural land by providing \$8,750 per acre of farmable land converted to MDC. It is unclear how this money will be used to sustain or encourage agriculture in other areas. The per acre value should be comparable to development rights on agricultural land elsewhere in the county so that agriculture can continue as a viable economic driver in South Dade, moreover the developer should find a willing seller to compensate for the per acre loss.

Suggested Changes To Improve The Application

Approving this application would contradict multiple important objectives and policies of the CDMF. However, this application and the analogous Infinity Gardens site to the north indicate a strong appetite to build in this area. Both applications include mandatory housing minimums, proximity to the South Dade Transit way, and compact development, which are all desirable attributes for new construction. Both applications consume relatively few acres of agricultural land with relatively low impact to unique environmental and other natural resources.

All these factors should qualify a location as a candidate for a new UEA. Commissioners and the administration should evaluate this area in the upcoming Evaluation and Appraisal Report for redesignation, as the Coalition and other groups have noted the problematic characteristics (e.g., the existence of wetlands, wellfields CERF footprints and Coastal High Hazard areas) of the existing UEAs. See figure 1 below for the location of existing UEAs and the “Study Area” from the UEA Task Force report that contains the Naranja and Infinity Gardens applications in purple.

The applicant has proffered a minimum of 20% of the units to be affordable to individuals earning up to 140% of Area Median Income (AMI). This application would be strengthened by increasing the minimum at least 40% of units priced in that range and participating in the County’s Workforce Housing Development Program to increase opportunities for cost burdened families earning between 60-110% of AMI. These residents are facing unique challenges in the area and should not be included in any housing project requiring a UDB change, especially those sited near transit.

To provide additional value to residents and alleviate traffic congestion, the County and Naranja should evaluate upgrading pedestrian, bicycle, and other mobility options to connect residents to the Princeton Circulator stop at SW 139th Ave and the South Dade Transitway Station at SW 264th. Both sites are less than $\frac{3}{4}$ of a mile from the Naranja location and would provide opportunities to reduce resident commuting and travel expenses.

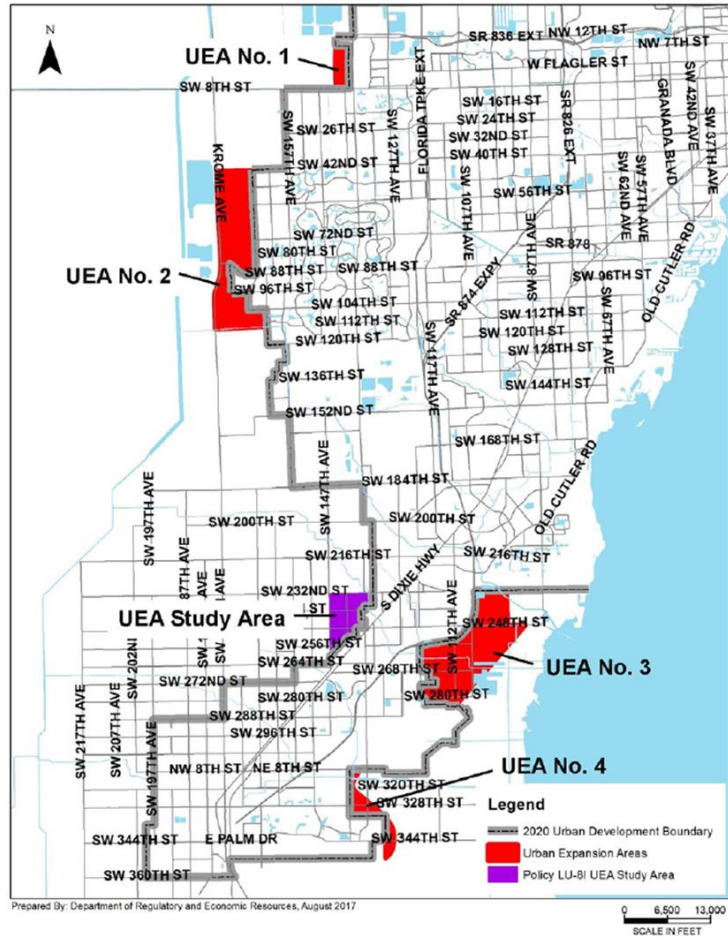


Figure 1: Urban Expansion Study Area shown in purple, Current UEA's shown in Red, Source Miami Dade Planning Department UEA Report

Conclusion and Recommendation

This application should not be considered in isolation. The Naranja and Infinity Gardens applications both request UDB expansions to provide high density residential units near the South Dade Transit Way. There are clear benefits to these proposals, but experience shows that granting exemptions to CDMP requirements can set undesirable precedents and encourage copycat applications.

An Evaluation and Appraisal Report cycle begins in 2024. We believe these applications should begin a broader reconsideration of where UEA's are located. In the past, the Coalition supported the proposal for a Urban Expansion Area at this study location, with the retraction of all CERP wetlands from current UEA's. This would be a welcome change so we are not pointing developers in the wrong direction.

As noted by County staff in their Initial Recommendations Report, the application does not establish a need and violates multiple CDMP provisions. The Coalition understands Planning staff's recommendation to transmit to the state for additional information and comments due to the positive elements of the proposal. **However this should be accompanied by a recommendation of denial because of the lack of demonstrated need at this time, a declaration of restrictions will not change the lack of need.**

We look forward to answering questions or providing more information to support smart growth in Miami-Dade County.

Sincerely,

Laura Reynolds



**Organizing Representative
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