

**November 6, 2023**

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

**RE: CDMP20230010 - Infinity Gardens Apartments LLC**

Planning Advisory Board Members,

The Hold the Line (HTL) Coalition, an alliance of individuals, community groups, businesses, municipalities, and organisations dedicated to responsible and sustainable land management in Miami-Dade County, hereby submit the following comments on application CDMP20230010, filed by Infinity Gardens LLC, hereafter “Infinity Gardens”.

**County Planning staff’s Initial Recommendation is to transmit the application for state review but Deny approval. The HLT Coalition concurs with this assessment due to the lack of need to add land for residential development inside the Urban Development Boundary (UDB). Also, the request for text amendments is contradictory to established and beneficial Comprehensive Development Master Plan (CDMP) policies.**

**Proposed (CDMP) Amendments**

Infinity Gardens requests several changes to the CDMP:

- Amend the CDMP Future Land Use Map designation from “Agriculture” to “Special District” for 8.48 acres of a property outside of the UDB contained within a larger parcel that is diagonally bifurcated by the UDB.
- Redesignate the entire Application Area from “Agriculture” & “Industrial/Office” to “Special District” & “Industrial Office”.
- Expand the UDB to include the entire Application Area.
- Implement text revisions to Policies LU-8G and LU-8H of the CDMP Land Use Element, revision to the “Policies for Development of Urban Centers” and CDMP Future Land Use Element “Special Districts” text.

Infinity Gardens is requesting these changes to develop the application area into a 773-unit mixed use development, incorporating residential and commercial uses.

**Needs Analysis and CDMP Compliance**

Infinity Gardens demonstrates mixed compliance with multiple CDMP Policies and Elements, in particular Policy LU-8G that establishes criteria for a UDB expansion. The application site is within a half-mile of the South Dade Transitway, a Strategic Miami Area Rapid Transit (SMART) Plan corridor, bifurcated by the UDB and the portion inside the UDB is located in a CDMP designated Urban Center. These elements support an argument for expansion.

**County staff’s analysis shows Infinity Gardens has failed to demonstrate the need to expand the UDB to supply land for residential development.** Infinity Gardens' application also fails to demonstrate full compliance with Policy LU-8H governing creation of “Special Districts” and is

generally not compliant with Policy LU-8E designed to evaluate Land Use Plan map amendment applications. The application site is in the Redland area south of Eureka Drive where UDB expansion is prohibited. Further, it requests redesignation of a property utilised for Agricultural purposes outside of an Urban Expansion Area (UEA) which the CDMP identifies as unsuitable for development.

Additionally, Infinity Gardens proposes three CDMP Land Use Element text changes. First, to allow the external portion of properties bifurcated by the UDB in the Redland area to be eligible for development. Second, allowing those same properties to waive the mitigation requirement for impacts to properties designated Agriculture Use. Third, allowing Urban Center development to extend beyond the UDB for properties compliant with the first two elements. County staff have recommended denying the second and third proposed text changes in their current form due to incompatibility with core CDMP objectives.

### **Conversion of Agricultural Land**

The conclusions of the Agricultural Lands Final Report indicate that extreme caution should be exercised before authorising any agricultural land conversion for other uses. The report established that in order to maintain a viable agricultural industry, the County must maintain a minimum of 64,800 acres available for agricultural production until 2030, a threshold that is likely to be breached given the current rates of agricultural land consumption.

### **Suggested Changes To Improve The Application**

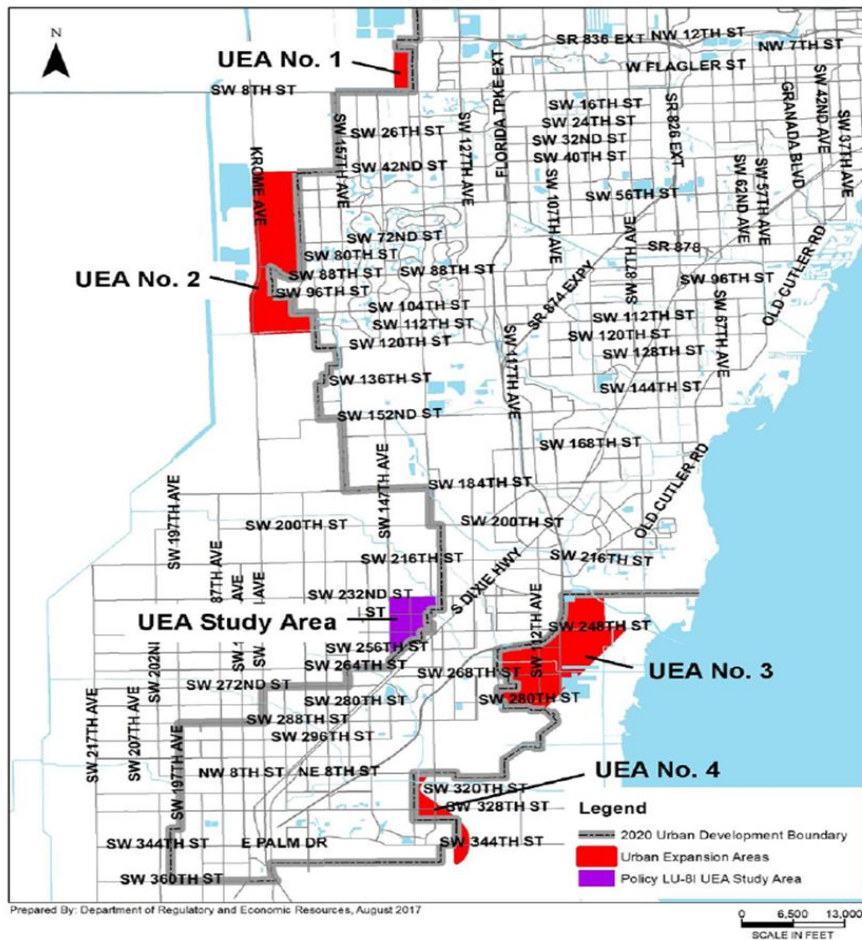
The Coalition is supportive of development proposals addressing the need for more affordable housing, particularly with public transit access. The applicant has committed to 40% of the units, as workforce housing with access to enhanced transit service, in alignment with Housing Element Objective HO-6 and Policy HO-6A and exceeding the minimum requirement of Land Use Element Policy LU-8H.

Funds should be proffered on a per acre agriculture impact to mitigate and offset the impacts to the Redland agricultural area. 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.

The applicant has proffered a minimum of 30% 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 there should be an effort to upgrade pedestrian, bicycle, and other mobility options to connect residents to public transit options. In the past the Coalition has supported proposals for a UEA Study Area that includes the application site due to its proximity to the Rapid Transit Zone (figure 1). HTL greatly values proposals that minimise impacts to County's natural resources. Further, UDB expansion in this area would not encroach on the existing County wetlands or other valuable natural resources or interfere with Comprehensive Everglades Restoration Program (CERP) or Biscayne Bay and Southeastern

Everglades Ecosystem Restoration Project (BBSEER) implementation (figure 1).



*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 CDMR requirements can set 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 new Urban Expansion Area "Study Area" that could be modified to include these application areas. In exchange, existing UEA locations that are problematic and contain CERP footprints should be retracted.

**The Coalition reiterates staff's analysis that there is not a demonstrated need to expand the UDB or to support the requested text amendments. The Board of County Commissioners should Transmit the application for more information but recommend Denial because of the lack of demonstrated need and the text amendment which would impact more than just this location.**

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

Sincerely,



**Laura Reynolds**

**Organizing Representative**  
**Hold the Line Coalition**

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