

**November 6, 2023**

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

**RE: CDMP20230008 - EIP IV FL Round Hammock Land Co. "Round Hammock"**

Planning Advisory Board Members,

The Hold the Line 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 CDMP20230008, filed by EIP IV FL Round Hammock Land Co., hereafter "Round Hammock". County Planning staff have issued an initial recommendation to transmit this application without recommendation. The Hold The Line Coalition concurs with the staff recommendation to obtain more information and conduct a full analysis of the project. We urge the Board to join Planning staff to request additional documentation on financial compliance, site administration and maintenance, and preservation of existing environmental attributes.

**Proposed Comprehensive Development Master Plan (CDMP) Amendments**

Round Hammock requests that the County redesignate a 239.9-acre property in Commission District 9 on the LUP Map from "Agriculture" to "Environmental Protection" to create a private wetland mitigation bank.

**Needs Analysis**

The intent of the application is to meet the need for wetland mitigation credits which will be generated by the creation and management of the area designated as a wetlands mitigation bank. Only two mitigation banks have been established in MDC: Florida Power & Light Company's Everglades Mitigation Bank Phase I (1996), and Phase II (2003) and Hole in the Donut Mitigation Bank (1996). As a result, the supply of wetland mitigation credits in the County is scarce. Rigorous permitting and oversight requirements to ensure performance standards of the bank and delivery of environmental benefits must be met prior to credits being released. The proposed wetland mitigation bank seeks to help to address the shortage.

**First, it must be emphasized that the creation of wetlands mitigation banks to mitigate wetland destruction and degradation is always the least preferred option.** Florida Administrative Code emphasizes impacts to wetlands should be avoided and minimized. County policy embodied in CDMP Objective CON-7 prioritizes the preservation and public acquisition of wetlands with the use of mitigation as a secondary option. We strongly urge the Board and the administration to exercise caution to avoid a scenario where expanding the supply of mitigation credits reduces adherence to these principles. Mitigation can meet or exceed performance expectations and provide measurable environmental benefits, but can never fully replicate natural features and habitat created by evolutionary timeframes.

**Second, the Round Hammock mitigation bank may be unnecessary based on the conclusions of a feasibility study to determine if areas acquired by the Environmentally Endangered Lands (EEL) Program can be utilized to generate wetlands mitigation credits.** The final report is expected in mid-2024. The initial estimate of acreage available is approximately 2,488 or more than ten times the acreage of the entire Round Hammock site before considering areas, such as the Natural Forest Community or buffer zones likely to be ineligible for restoration. A County managed mitigation bank would also presumably benefit from established coordination, data sharing, and the local expertise of County agencies. A County administered bank could also minimize any financial risk associated with a private third-party site administrator.

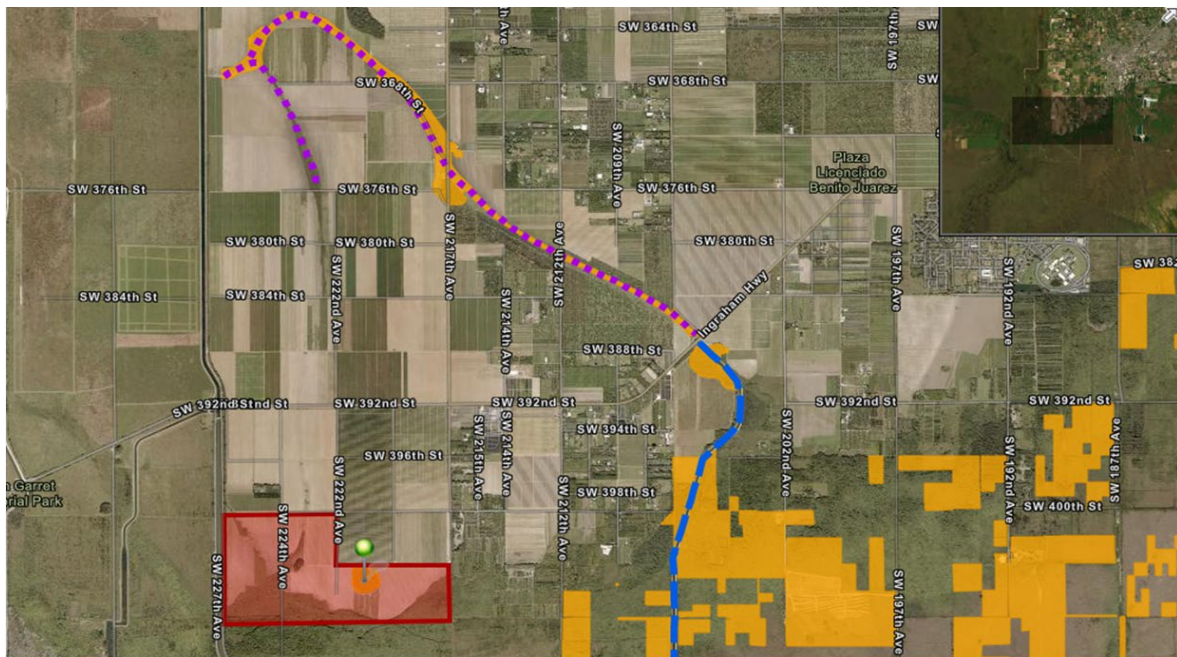
### **Analysis of the Application**

As of November 1st, the application is incomplete and does not provide enough detail to support a full analysis by County staff or Commissioners' offices. Multiple elements essential to a successful mitigation bank project have not been addressed or require further explanation and supporting documentation. Primarily, Round Hammock provides insufficient information regarding mitigation bank operations and administration, including no tentative operational timeframe, the number of mitigation credits anticipated to be made available, or the associated service area.

It is impossible to evaluate the merits of the application without a clear and detailed site management plan and a financial model with a pro forma estimate of costs of the initial restoration, revenue from sale of credits, and expenses related to ongoing site management. These provisions should carry a covenant or other enforcement mechanism protecting the County and nearby residents from any offsite damage or failure to meet onsite performance standards.

### **Environmental Factors**

Round Hammock has not presented a plan to protect desirable environmental features existing on the site or to manage possible conflicts with other beneficial land uses including:



**Proposed Mitigation Bank** **EEL acquisition list** **Love Land slough (BBSEER)** **C-111 canal (BBSEER)** **NFC**

- An existing hardwood hammock designated as an environmentally sensitive Natural Forest Community (NFC);
- Parcels on site designated for the Environmentally Endangered Lands (EEL) acquisition list;
- Parcels evaluated in the Comprehensive Everglades Restoration Plan (CERP) Biscayne Bay and Southeastern Everglades Ecosystem Restoration (BBSEER) effort in both alternatives of the final modeling round.

BBSEER represents a large-scale, complex, multi-agency project aimed at improving the quantity, timing, and distribution of freshwater flows to estuarine and nearshore areas in southern Biscayne Bay, which is implemented under CERP. These efforts are federally funded, and therefore require compliance and coordination under Policy CON-7J of the CDMP Conservation, Aquifer Recharge and Drainage Element. As such, the applicant must demonstrate how the proposed mitigation bank will coordinate its plans with those of the CERP-BBSEER project. The current (and final) round of BBSEER modeling includes use of the nearby C-111 canal and Love Land Slough as water conveyance features and storage.

### **Effect On Availability of Agricultural Lands and Impacts To Adjacent Cultivation**

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.

At the October 30th Community Council meeting, the Coalition asked the applicant to provide more information prior to the Planning Advisory Board meeting so that all the facts were presented before deciding. More information from State agencies will be critical as the project

will require the approval of the Florida Department of Environmental Protection (FDEP) and the South Florida Water Management District (SFWMD). The input of the FDEP and SFWMD will carry more weight than a CDMP application focused primarily on County needs.

We urge the Board to join Planning staff to request additional documentation on financial compliance, site administration and maintenance, and preservation of existing environmental attributes. It would be prudent to receive the feasibility study results for the EEL lands mitigation bank before proceeding with a much smaller project next to private lands. Above all, the Board should exercise extreme caution before converting any existing agricultural lands to other uses, especially without a full understanding of the plan to maintain this property in perpetuity. There is not enough information currently to offer an opinion on the merits of this application.

We look forward to gathering more information and working to balance the interests of all stakeholders to create an outcome that benefits Miami-Dade's ecology, economy, and residents.

**Sincerely,**

**Laura Reynolds**



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**Hold the Line Coalition**

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