

Chairman Oliver G. Gilbert, III  
Board of County Commissioners  
Miami-Dade County  
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Miami, FL 33128  
[District1@miamidade.gov](mailto:District1@miamidade.gov)

January 17th, 2022

**RE: CDMP Amendment CDMP20220011 “Agrihoods”**

Chairman Oliver G. Gilbert III &  
Members of the Board of County Commissioners

We write on behalf of the Hold the Line Coalition, an association of community organizations, individuals, municipalities, and businesses dedicated to promoting smart growth policies in Miami-Dade County. We are voicing our opposition to the “Agrihoods” application (item CDMP20220011 Out-of-Cycle Application 2022) a text change to the Comprehensive Development Master Plan (CDMP). This modification would unnecessarily expand allowable development in the agricultural land use designation outside of established County procedure and would create conflicts with Land Use and Conservation Elements of the CDMP. Moreover, it is unusual and inappropriate to make sweeping changes to a land use designation outside of the County’s established Evaluation and Appraisal Process with the participation of all impacted stakeholders.

The proposed amendment changes text in the **Agricultural land use category** of the CDMP Land Use Element and requests:

- 1) to provide for the creation of agricultural neighborhoods (or “Agrihood”) as an alternative land use in the South Dade agricultural area through clustering, establishing allowable uses and percentage thresholds for such uses, and requires the preservation of farmland by instrument, and
- 2) to allow for uses directly supportive of agriculture but not ancillary to an on-site agricultural use and uses related to and promotion of agritourism.

This **countywide amendment** claims to be supportive and protective of Florida agriculture while details of this application clearly indicate that the overall impact would be detrimental to agricultural activities and compromise the County’s agricultural output. This application seeks to introduce CDMP text into the Agriculture Land Use category that is commonly associated with residential and commercial developments, contrary to the plain English meaning of the term “agriculture.” In addition, the applicants have submitted a site plan for an Agrihood named The Hammocks on land outside the Urban Development Boundary that should be evaluated as a map amendment, not a text change to an entire land use category.

We urge you to reject this proposal on the grounds that this application would undermine long established goals and objectives of the CDMP and encourage urban sprawl at the expense of Miami-Dade County’s agricultural sector and ecological systems

**This application should be Denied and Not Transmitted for the following reasons:**

- 1) The CDMP changes the Applicant proposes would principally **facilitate the removal of significant acreages from agricultural production** by allowing 250-acre or larger ‘planned residential community’ developments (“Agrihoods”) in the South Dade agricultural area inconsistent **with and contrary to the CDMP** (see Fig. 1, a map of the southern part of the Miami-Dade County, highlighting areas currently in agricultural use that the proposed amendment is targeting).

The application purports to protect farming by clustering existing residential density allowances on agricultural lands while preserving areas reserved for agriculture and related uses. However, the proposed amendment and subsequent revisions facilitate the loss of large amounts of farmland and the County’s agricultural capacity. The application now requires **50% of an “Agrihood” to be designated for the combined uses of farmland, agricultural uses, and open space**, inclusive of landscaped recreation areas, already-protected environmental lands, and retention ponds. The application requires **only 30% of the “Agrihood” land to be designated for agriculture, with no covenant or requirement that any acreage remain in production.**

The most recent version of the text amendment requires each 2.5-acre privately owned residential lot to dedicate a minimum of 33% of land for agricultural uses and allows these individual allotments to count towards the “Agrihoods” minimum 30% agricultural acreage. As a result, an “Agrihood” could result in **only 13.5% of its area reserved for contiguous agricultural operations.** This revision would result in a forced fragmentation of agricultural land that is counterproductive to the goal of maintaining a viable agricultural industry.

If approved, the proposed amendment, would allow lands designated “Agriculture” on the CDMP Adopted 2030 and 2040 Land Use Plan (LUP) map, west of the Urban Development Boundary (UDB), and south of SW 184 Street, to be developed in a manner that could significantly deplete available agricultural lands, potentially leading to the loss of “economies of scale”. It is important to note that this amendment applies to more than half (52.1%), or ±29,763 acres, of total Agriculture-designated lands outside the UDB even when located south of SW 184 Street. This application continues to be in direct conflict with the Land Use Element Goal, Policies LU-1P, LU-1S, LU-1R, and LU-8C, and Conservation, Aquifer Recharge and Drainage Element Objective CON-6 and Policies CON-6D and CON-6E, which together require the preservation of agricultural lands and the protection and promotion of agriculture as a viable economic activity in the County.

- 2) The application, if approved, would **introduce an internal inconsistency into the CDMP by expanding the types of uses considered directly supportive of agriculture** to include lodging accommodations, convenience retail facilities, food establishments, recreational facilities etc. within the agriculture designation contrary to the intent of protecting viable agriculture. Although the Applicant’s recent changes limit the allowance for their proposed additional supportive uses to areas within an “Agrihood,” the changes still significantly expand the non-agricultural uses allowed in areas designated “Agriculture.”

The changes **expand ancillary non-agricultural uses by allowing any such uses to support the local agricultural “community” instead of the local agricultural “industry”**. While the applicants specifically reference ancillary uses that may be allowed only in an “Agrihood,” the broader change will affect all agriculturally designated lands. This is compounded by the removal of the qualifier that such uses must “primarily” support the local community, which lowers the standard by which a use must be demonstrated to be “supportive” of either agriculture or the local agricultural community. Therefore, approval of the Application will result in a significant expansion of non-agricultural uses that would be allowed in areas designated “Agriculture”.

- 3) **The application proposes highly inefficient clustering of 1 unit per 5 gross acres residential density allowed on Agriculture designated properties**, which Applicant claims is designed to protect farmland. However, the inefficient clustering proposal, combined with the broad allowance for commercial and other non-agricultural uses on agricultural properties could lead to additional subdivisions, fragmentation of large agricultural parcels, and **introduce uses that are currently not allowed outside the UDB**. This proposal as structured not only fails to provide any significant benefit to the agricultural industry, it would reduce the availability of large, contiguous acres of land which agricultural industry relies upon for efficient production.

**Approval of this application is premature prior to release of the County’s ongoing Agricultural Lands Study conducted by the University of Florida.** The study is designed to determine the amount of land needed to maintain and support a viable agricultural industry and make recommendations to improve the economic sustainability of agriculture in Miami-Dade County. Florida is also facing challenges stemming from sea level rise and global climate change – such a sweeping CDMP modification should not proceed before updated information about the consequences of building outside the UDB are better understood, making conclusion of the study a paramount priority. Contrary to the applicant’s assertions this would be protective of agriculture, the Agricultural Practices Board passed resolution AG-022-04 (Figure 8) stating that the application is “not acceptable to the agricultural community nor would encourage the best agricultural practices.”

- 4) **The amended application explicitly allows private septic systems** and well water to serve “Agrihood” lots, whereas the prior version required an “Agrihood” to be served by a private utility for potable water and sanitary sewer service. This change is in direct conflict with County efforts to connect properties served by septic systems to sewer infrastructure and wastewater treatment facilities. Combined with the introduction of non-agricultural uses, the proposed new septic and well allowance increases the risk of environmental degradation. Septic tanks pose huge environmental and public health risks as they were not designed with the assumption that groundwater levels would rise gradually over time (see Fig. 1 demonstrating areas in Miami-Dade County with vulnerable septic systems). Failing septic systems risk contaminating the Biscayne aquifer that provides drinking water to the entire County. This contamination could lead to the outbreak of water-borne diseases, causing public health risks as well as result in contamination of coastal waters and subsequent degradation of vulnerable South Florida ecosystems, including Biscayne Bay and Everglades National Parks.

- 5) **The area currently considered for “The Hammocks” Agrihood (Fig. 4, 6, 7) is not topographically or environmentally suitable for residential or commercial purposes.** The proposed application contains highly sensitive low-lying areas that are subjected to routine flooding, making agricultural activities in the area - particularly those in the context of an “Agrihood” requiring mixed cropping- challenging. Negative environmental effects of such developments are further compacted by location’s proximity to federally protected wetlands and Everglades National Park. See Figs 2 and 3 showing site’s general location and proximity to federally protected parks and wetlands.
- 6) The Agrihood text change and proposed site of The Hammocks development not only change CDMP rules but would **conflict with pending state legislation.** HB 175 filed by Rep. Demi Busatta Cabrera would create a 2-mile buffer zone from the Everglades Protection Area in which proposed development would be subject to review by state of Florida agencies. **Notably, the application for “The Hammocks” is located entirely within the proposed buffer zone (Fig. 5).**

Allowing the CDMP text change in general, and specifically the Hammocks site to be built may also conflict with programs and funding resulting from Gov. DeSantis executive order to direct \$3.5 billion dollars to Everglades restoration.

We reiterate this application is in conflict with an extensive list of CDMP goals, objectives, and policies (i.e. LU-1, LU-1C, LU-1O, LU-1P, LU-1R, LU-1S, LU-1U, LU-2B, LU-3B, LU-4A, LU-4B, LU-8C, LU-8D, LU-10A, CON-6D, CON-6E, TC-4C, CIE-3, SW-1A. In addition, **applicants’ choice of a text amendment rather than a site-specific map amendment leads agencies and departments to cite lack of necessary information to complete their analysis and provide a complete recommendation** (e.g. MDFR, PROS and others). Absent these reviews, transmitting this application for State of Florida agency review is premature, and wastes staff time and taxpayer money.

Miami-Dade County has committed to maintain a flourishing agricultural sector as a critical component of a diversified economy and for the ecological services provided by productive and non-producing lands in the Agriculture designation. To uphold this commitment, the County must avoid taking steps that deplete the stock of agricultural lands, especially prior to receiving the Agricultural Lands Study scheduled to be delivered in August 2023. The Board should also adhere to established procedure for CDMP land use designations during the EAR process and require the applicant to submit their proposal as a map amendment so agencies and staff may conduct a complete evaluation. The members of the Hold the Line Coalition respectfully ask that you reject this overreaching text amendment that redefines agriculture in Miami-Dade County, and **we urge you to Deny and Do Not Transmit** this application.

Sincerely, **Laura Reynolds**



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

**Hold The Line Coalition Steering Committee Members:**

**Eve Samples**

Executive Director  
Friends of the Everglades

**Lauren Jonaitis**

Conservation Director  
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**Elizabeth Fata Carpenter**

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**Mary Waters**

President Tropical Fruit Growers  
Former President Community Council 14

**Grace Perdomo**

Former Executive Director  
Transit Alliance

**May Rodriguez**

Executive Director  
So Florida Community Development Coalition

**Katy Sorenson**

Former Miami-Dade County Commissioner  
District 8

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1000 Friends of Florida

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Volunteer Cleanup, Founder  
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US Army Corps of Engineers, Ret.

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**Philip Kushlan**

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Friends of the Everglades

**Paul Owens**

President  
1000 Friends of Florida

# Exhibits

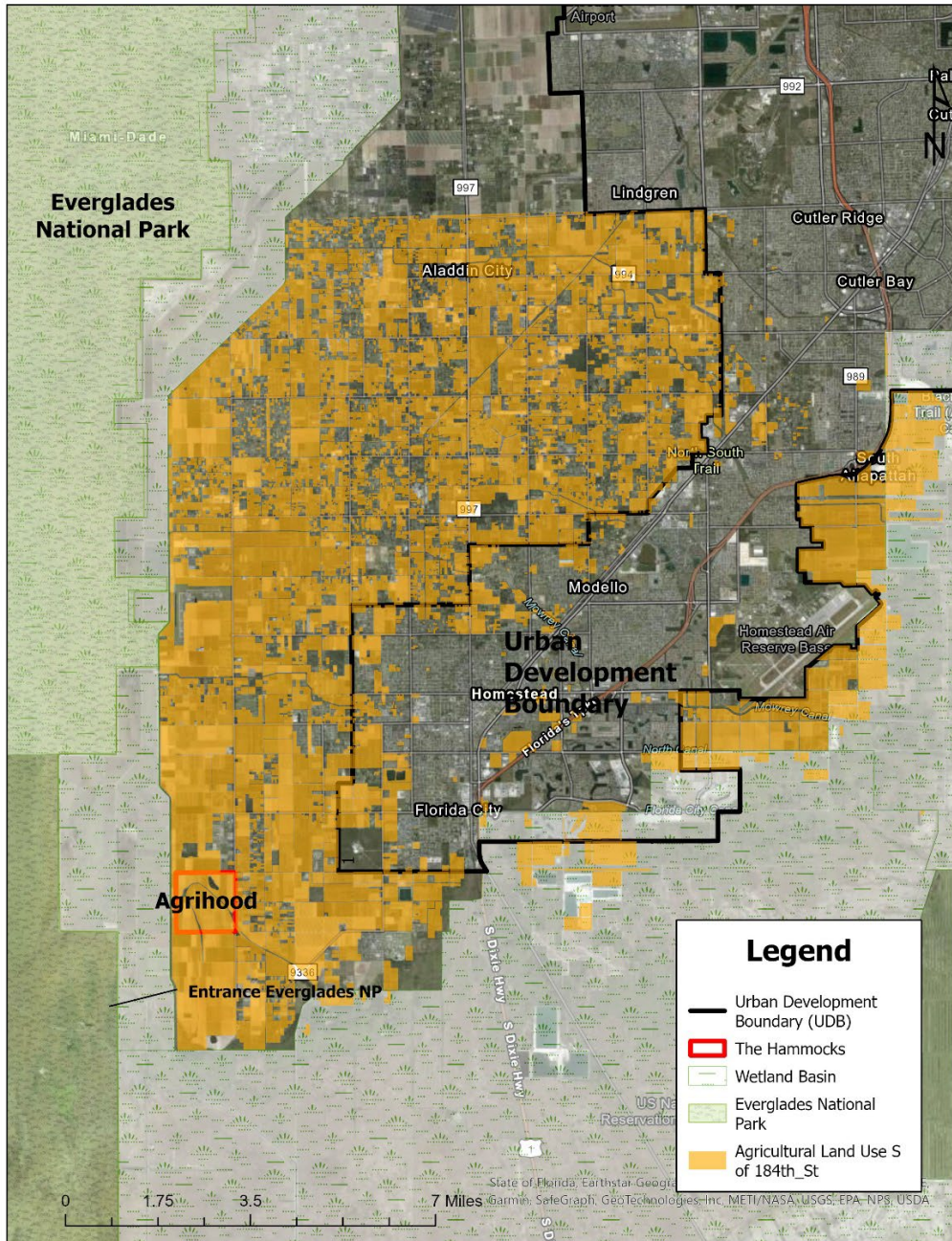


Figure 1. Map of the southern part of the Miami-Dade County, highlighting areas currently in agricultural use. Urban Development Boundary (UDB) is shown with black bold line.

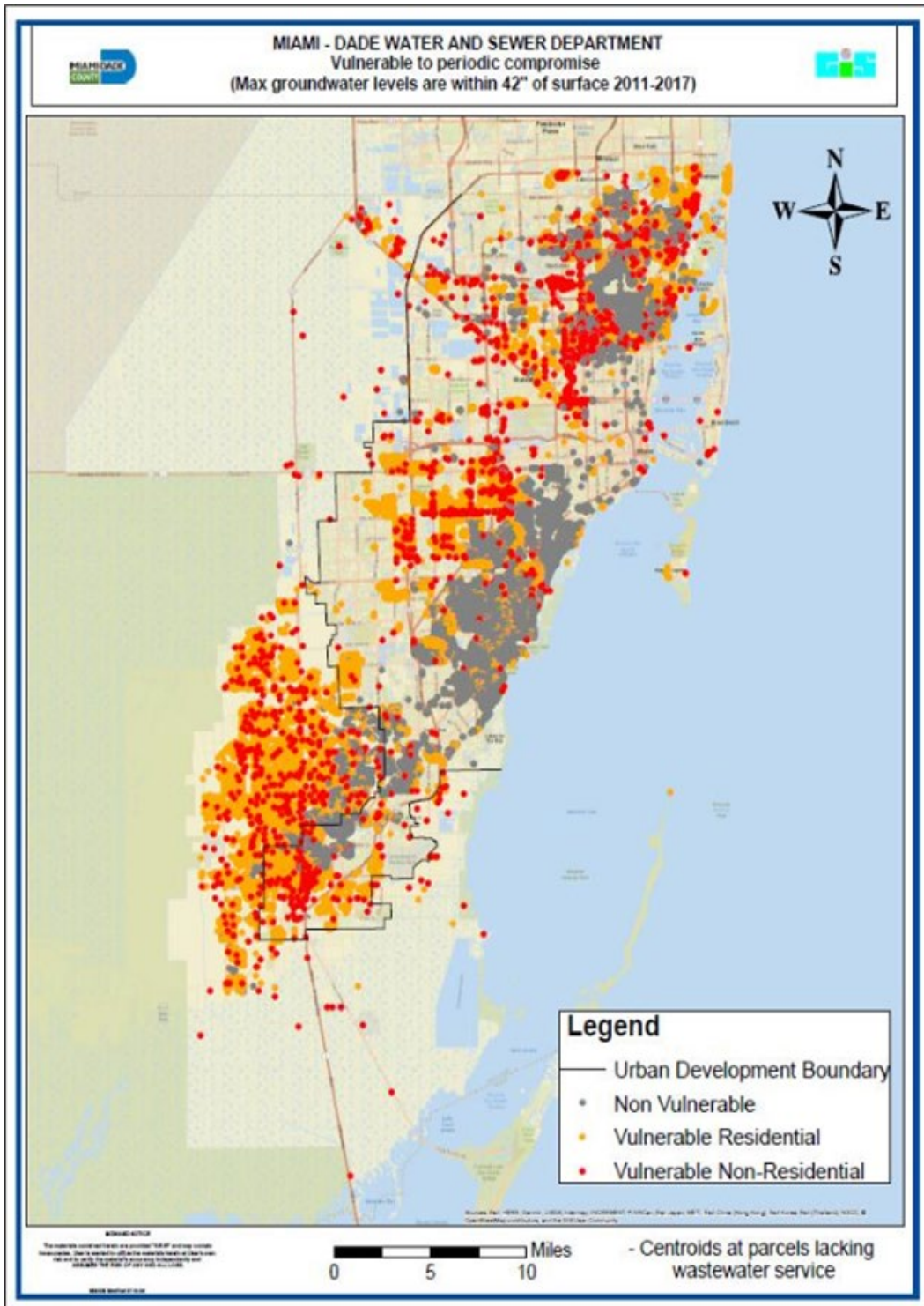


Figure 2. Map showing the areas in Miami-Dade County with vulnerable septic systems. Accessed from: <https://www.miamidade.gov/green/library/vulnerability-septic-systems-sea-level-rise.pdf>.

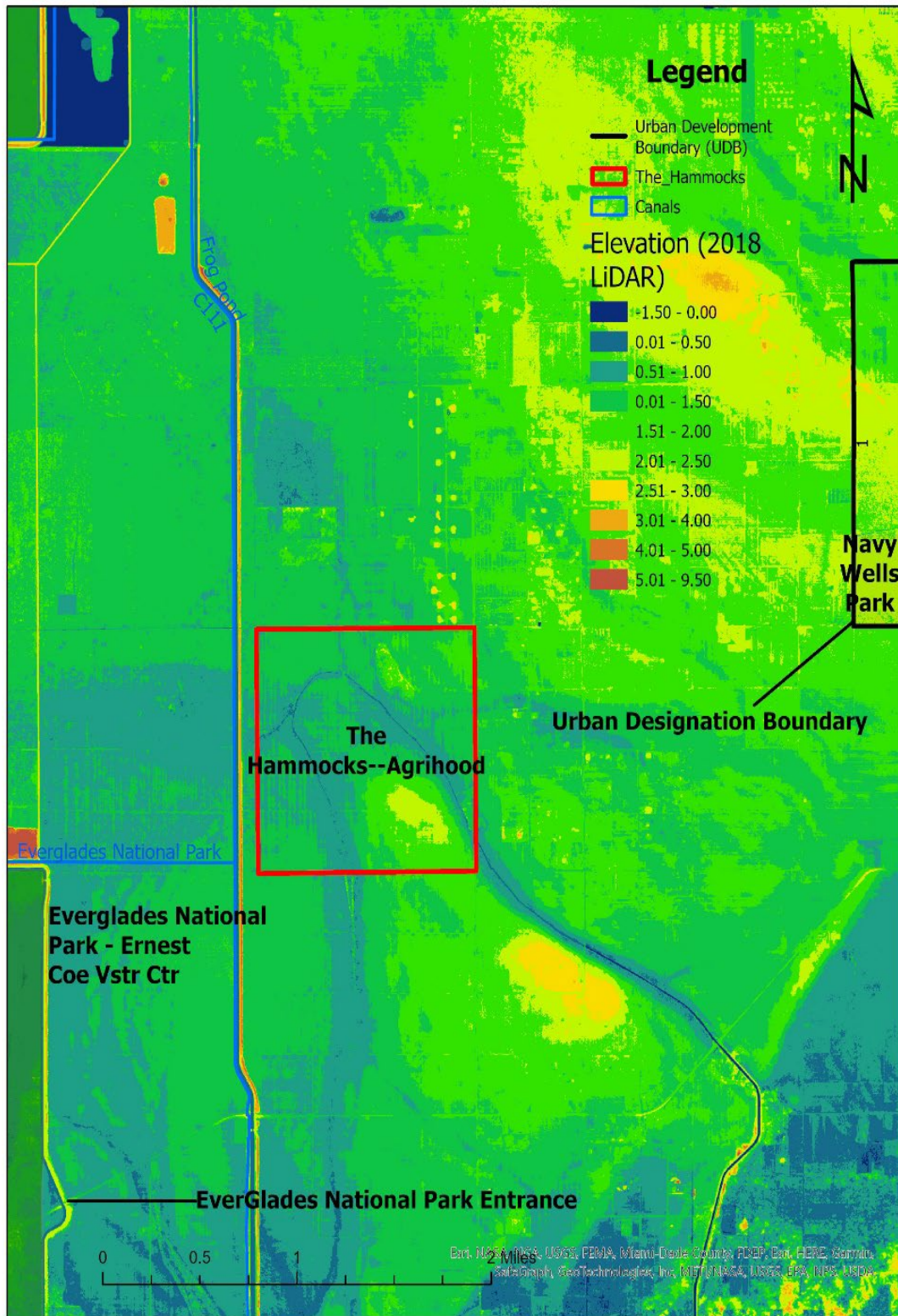


Figure 3. Lidar map of the area proposed for The Hammocks (perspective “Agridhood” development) showing local topography and the very low elevations characteristic of the area.



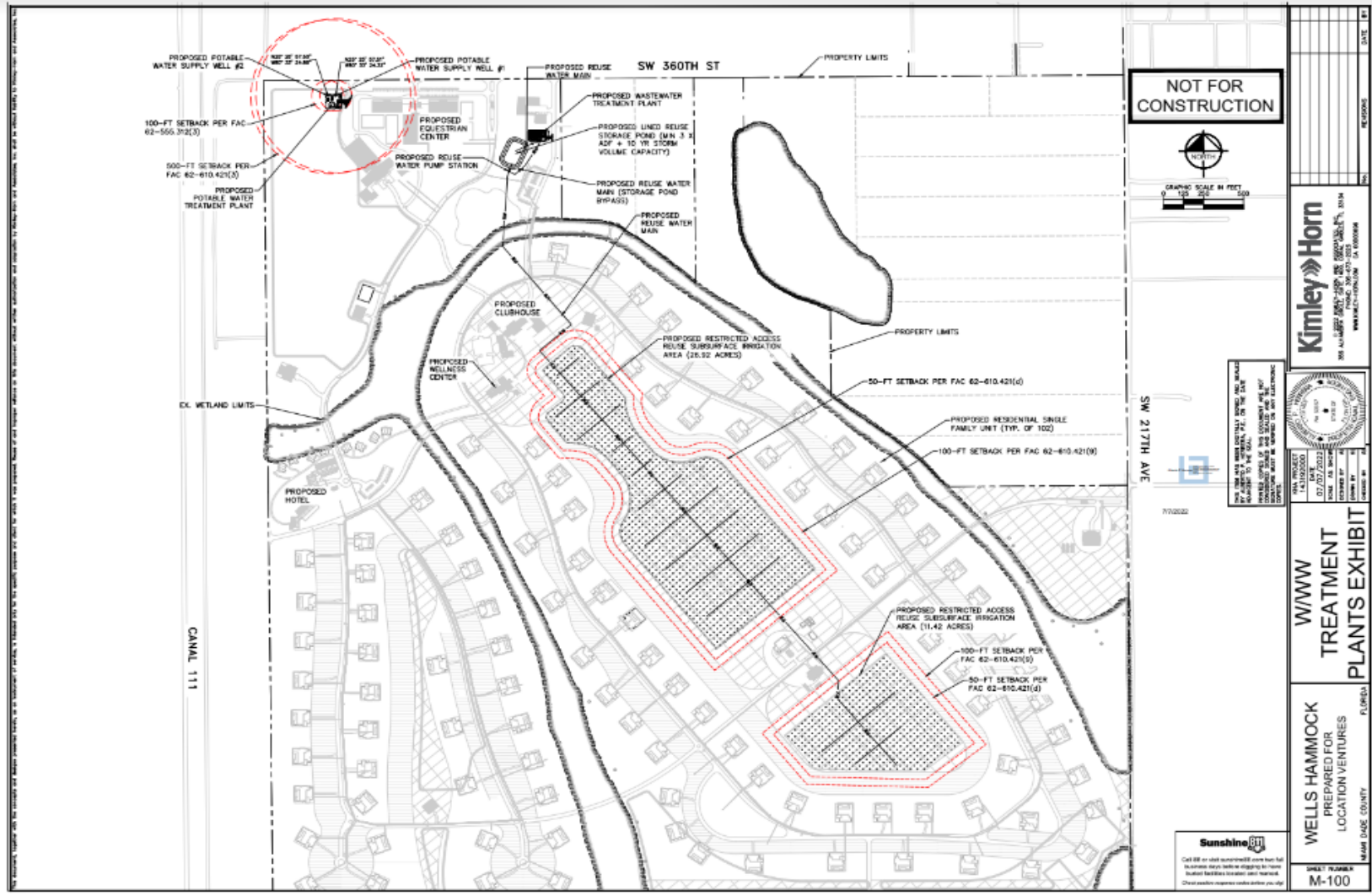


Figure 4. Conceptual Site Plan for “The Hammocks” Agrihood showing residential subdivision around Loveland Slough. Hotel, equestrian center, and now replaced wastewater treatment plant are also shown in the upper left-hand corner. The entire area pictured, and all development is currently agricultural land.

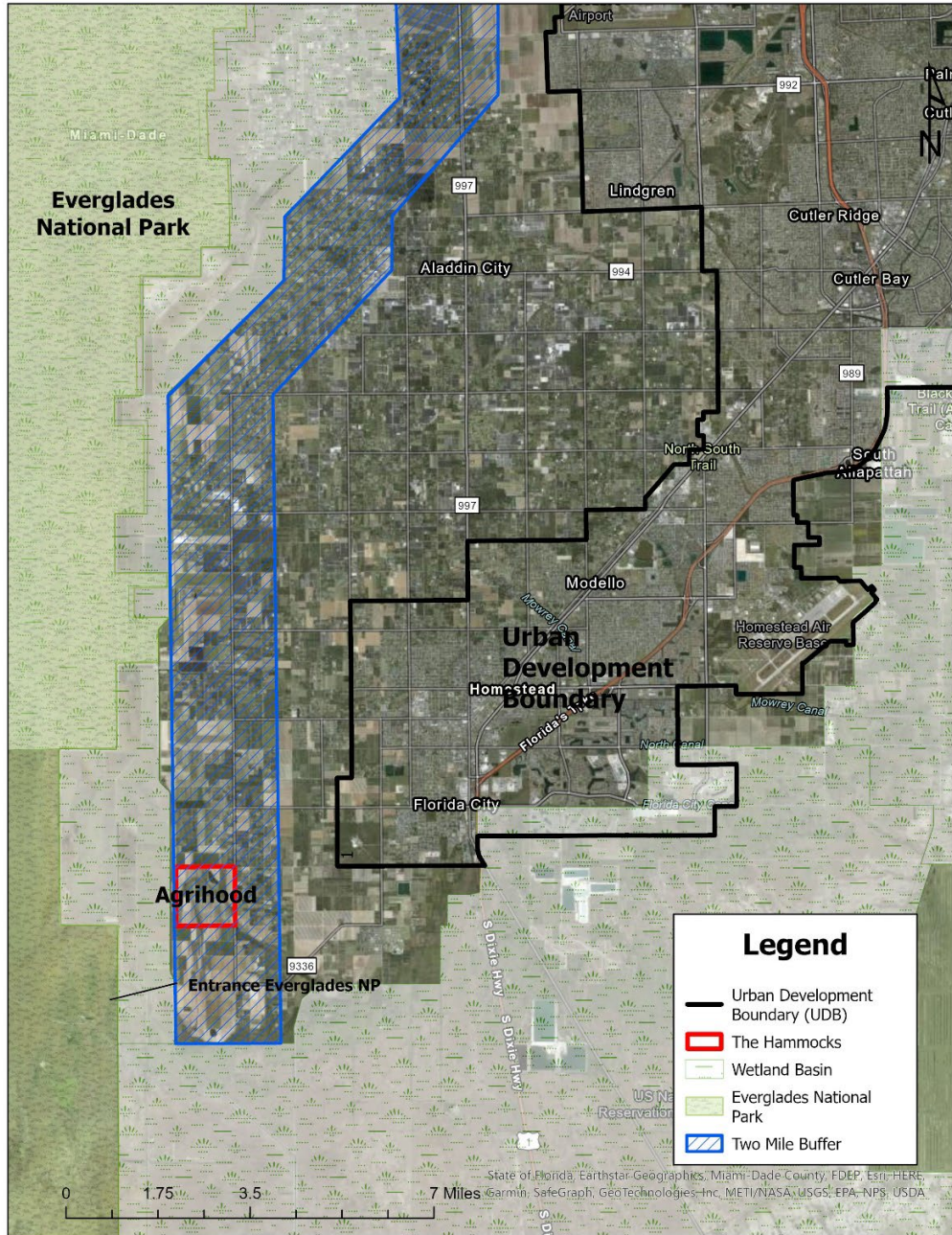


Figure 5. Satellite image showing southern portion of the Miami-Dade County and locations of Florida wetlands as well as the Everglades National Park (ENP) relative to the proposed “Hammocks” development. Chosen location is right at the ENP’s doorstep and within the proposed 2-mile buffer zone.



Figures 6 and 7. Photos of flooding in and around Loveland Slough at the proposed Hammocks site. Pictures courtesy of Don Pybas, taken 8/28/2005.

RESOLUTION NO. AG-22-04

A RESOLUTION OF THE MIAMI-DADE COUNTY AGRICULTURAL PRACTICES ADVISORY BOARD TO THE BOARD OF COUNTY COMMISSIONERS RECOMMENDING THAT THE PROPOSED AGRIHOOD CDMP APPLICATION AS CURRENTLY FRAMED IS NOT ACCEPTABLE TO THE AGRICULTURAL COMMUNITY NOR WOULD ENCOURAGE THE BEST AGRICULTURAL PRACTICES

WHEREAS, Sections 2-931 through 2-936 of the Code of Miami-Dade County provide for the creation, composition, terms, purpose and duties of the Miami-Dade County Agricultural Practices Advisory Board (APAB); and

WHEREAS, in order to fulfill its purpose as defined in Section 2-931 of the Code, the APAB shall provide recommendations to the Board of County Commissioners regarding the regulation of agricultural practices in Miami-Dade County, Florida.

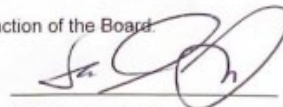
NOW, THEREFORE, BE IT RESOLVED that the Miami-Dade County Agricultural Practices Advisory Board recommends to the Board of County Commissioners that the "Agri-hood" Comprehensive Development Master Plan Application (CDMP20220011), as currently framed, is not acceptable to the agricultural community nor would encourage the best agricultural practices.

The foregoing resolution was offered by Board Member Motes, who moved its adoption. The motion was seconded by Board Member Philcox and, upon being put to a vote, the vote was 6 to 2 as follows:

Ivonne Alexander	N/A	Mark Philcox	Yes
Larry Caudle	Yes	Barney Rutzke, Jr.	No
Marc Ellenby	Yes	Tommy Vick	N/A
Arturo Lopez	Yes	Arie de Zwart	N/A
Martin Motes	Yes		
	Sam Accursio, Chair	No	
	Erik Tietig, Vice Chair	Yes	

The above action was taken by the Agricultural Practices Advisory Board at its public hearing on December 7, 2022.

I hereby certify the above information reflects the action of the Board.



Sam Accursio, Chair  
Agricultural Practices Advisory Board

Figure 8. Agricultural Practices Board Resolution opposing the Agrihoods application to expand uses allowed under the Agricultural land designation. Passed 12-20-2022.

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