

**December 5th, 2022**

Planning Advisory Board  
Stephen P. Clark Government Center  
111 NW 1 Street, Miami, FL 33128

**RE: CDMP20220011 - Application to Amend the Comprehensive Development Master Plan (CDMP) to provide for creation of “Agrihoods” filed by LVMD LLC.**

To Chairman Wayne Rinehart Members of the Miami-Dade County Planning Advisory Board,

We write on behalf of the Hold the Line Coalition, a collection of community organizations, municipalities, businesses, and individuals dedicated to promoting smart growth policies in Miami-Dade County. We oppose the “Agrihood” application (item CDMP20220011 Out-of-Cycle Application 2022) and urge you to recommend denial and non-transmittal as recommended by County Staff on November 23rd, 2022.

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

- 1) to provide for the creation of agricultural neighborhoods (or “Agrihoods”) 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 agritourism.

This countywide amendment would be vastly detrimental to the agricultural activities at large and the future viability of Miami’s second largest economic sector. Currently the University of Florida is studying the amount of Agriculture needed in Miami Dade County and those results are set to be back before us in the summer of 2023. We would hope before making such a broad text amendment change you would wait for all of that information to come back before you. We urge you to reject this proposal on the grounds that this application would encourage proliferation of urban sprawl outside of the UDB, without moving it and do so at the expense of Florida agriculture.

This application should be denied and not transmitted for the following reasons:

- 1) The changes to the CDMP that the Applicant is proposing 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. The application purports to protect farming by clustering existing residential density allowances on agricultural lands while preserving areas from which the residential density would be removed for agriculture and related uses. However, the proposed amendment guarantees that only 30% of an Agrihood site would remain in agriculture or agriculturally related use(s). In other words,

the proposed amendment would facilitate up to 70% of the agricultural acreage to be converted to a non-agricultural use. This application is 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. The proposed amendment, if approved, 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” currently enjoyed by the agricultural industry and its support services and undermine the industry’s economic viability. This is a particularly troubling prospect, given that Florida is one of the major agricultural states within the US, and impacts to local agriculture could then potentially extend to a country-wide level;

- 2) The application proposes highly inefficient clustering of the 1 unit per 5 gross acres residential density allowed on Agriculture designated properties and would facilitate up to 70% of the acreage in an Agrihood being converted to a non-agricultural use, which is once again inconsistent with the CDMP provisions to preserve agricultural lands and the viability of the agriculture industry;
- 3) The application, if approved, would introduce an internal inconsistency into the CDMP by expanding the range of uses considered directly supportive of agriculture (*allowing a range of lodging accommodations [e.g. hotels, motels], convenience retail facilities, food establishments, recreational facilities etc.*) within the agriculture area that would run contrary to the intent of protecting viable agriculture. It is unclear how the proposed range of uses would be directly supportive of agriculture, and the proposed text does not provide criteria to guide how and when such uses would be directly supportive of agriculture. This is in addition to the allowance for agrihoods proposed in the application as a ‘planned residential community’ that would itself remove significant acreage from agricultural use.
- 4) Approval of this application would be premature prior to the conclusion of the County’s ongoing Agricultural Lands Study conducted by the University of Florida, which is designed to determine the amount of land needed to maintain and support a viable agricultural industry and make recommendations for improvement of the economic sustainability of agriculture within Miami-Dade County. Florida is also facing additional challenges stemming from sea level rise and global climate change – such significant CDMP modifications should not proceed before a comprehensive strategy is established, making conclusion of the aforementioned study a paramount priority, and finally;
- 5) This application, if approved, will make residential the primary use for large swaths of land located south of SW 184th St outside of the UDB, and designated “Agriculture” on the CDMP LUP map, relegating agriculture to a residential amenity maintained by a homeowner’s association. Approval of the application could result in a proliferation of similar “farm-themed subdivisions,” reducing the supply of land for true agricultural production and setting the stage for additional conflicts between agriculture and residential uses.

We once again emphasize that this application is currently 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* – to name a few). In addition, due to the nature of this application, a series of agencies and departments cite lack of necessary information and are unable to complete their analysis and provide a complete recommendation (e.g. MDFR, PROS and others). We encourage you to have the applicant provide the information necessary so this can be fully evaluated as well as wait for the University of Florida study before making such a broad change to Agricultural lands.

The County Commission is constrained by state law to render a decision that is in accordance with our Comprehensive Development Master Plan. **On behalf of the Hold the Line Coalition, we urge you to Deny and Do Not Transmit this application.**

Sincerely,

**Laura Reynolds**



**Organizing Representative Hold the Line Coalition**

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