

October 5, 2022

**Chairman Jose “Pepe” Diaz**  
Board of County Commissioners  
Miami-Dade County  
111 NW 1st St, Suite 220  
Miami, FL 33128

**RE: Hold the Line Coalition is opposed to item 11A2 and supports item 11A22 in its current form**

Dear Honorable Chairman Diaz and the County Commission,

The Hold the Line Coalition writes to you today to urge you to vote no on item 11A2 and reject the notion that we will change our policies for one developer. This item would extend Urban Expansion Area (UEA) No. 2 by 2,673 acres, matching up with the pending parkland (now City Park) application just waiting to be filed once this passes. Instead we ask you to help actually solve the County’s ongoing housing crisis by supporting the Cava-Diaz compromise item 11A22.

**Opposition to 11A2**

**Item 11A2 will promote development on thousands of acres of land currently used for agriculture.** Miami-Dade County should not consider expanding UEAs to include agricultural land until the pending agricultural report is completed and reviewed. Without updated information, the County risks depleting the agricultural land supply to such a point that it is no longer economically viable to farm in South Florida, crushing the County’s second largest economic drivers.

The land included in Item 11A2 is located far from transit. We should be encouraging development around existing public transit and SMART Plan corridors. Any potential developments in this area will likely just increase congestion and put further strain on our roads.

The proposed UEA Expansion in UEA2 overlaps the boundary for the proposed City Park development (formally Lennar’s Parkland that is over 900 acres from 2007) Decisions on future growth like this expansion of UEA No. 2 should be made based on careful consideration of natural resources, transit availability, and environmental considerations, not based on the preferences of developers. This expansion is not in line with the UEA Task Force’s findings:

They noted that 950 acres of UEA No. 2 are unsuitable for development due to conflicts with CERP project footprints.<sup>1</sup> In addition, the UEA Task Force did not recommend the expansion of UEA no. 2 even with this retraction. We should be making decisions that are consistent with the recommendations of the UEA Task Force, which were only to retract the CERP footprint and not to expand at this time.

### **Considerations for 11A22**

We would like to thank the Mayor and Chairman Diaz for compromising on this final version of item 11A22, while we are uncomfortable with adding 35,000 single-family homes to the housing supply by 2025. **We support this proposal because it prioritizes development on land within the UDB.** We are still uncomfortable with the fact that as it stands, detached single-family homes are the most unaffordable classification of homes. We hope to see that in practice, this proposal prioritizes more affordable housing types through lot-splitting, townhouses, duplexes, triplexes, etc. inside our urban boundary to help bolster transit investments and redevelopment.

The County should be focused on infill development and work on legislation that would incentivize these investments; we are sandwiched between two national parks and must make better use of our land surface area. It is clear that a more affordable lifestyle can occur in the urban core because the overall transportation cost goes down for family's the closer they are to public transit and places of work. **Our coalition supports smart growth with more mixed-use, high-density developments with access to public transit.**

We urge you to vote no on item 11A2 we simply cannot put our agriculture economy in jeopardy or lead anyone to believe this is the best place for future growth in Miami Dade, it is not. Item 11A2 will encourage sprawl further westward into agricultural land in direct conflict with the goals and priorities outlined in our CDMP. It is clear this is for one developer who has a pending application to file once this passes. Reject this proposal and instead support real solutions to our housing crisis by passing item 11A22 which, while not perfect, is a great compromise to address the pressing need for affordable housing in the County.

Sincerely,

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<sup>1</sup> Miami-Dade County Urban Expansion Area Task Force Final Report, 05/07/2018  
<https://www.miamidade.gov/planning/library/reports/uea-final-report.pdf>

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Hold the Line Coalition

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