

March 18, 2024

Miami-Dade County Board of County Commissioners
111 NW 1st Street, Suite 220
Miami, FL 33128

RE: Agricultural Zoning and Agritourism Ordinance

Chairman Gilbert and Members of the Board,

The Hold the Line Coalition (HTL), an alliance of individuals, community groups, businesses, municipalities, and organizations dedicated to responsible and sustainable land management in Miami-Dade County (MDC), asks you to vote against Item 7B on the March 19th Board of County Commissioners agenda. **A vote for this ordinance poses an unacceptable risk to the survival of Miami-Dade's agricultural economy and has the potential to transform rural areas into lightly regulated business zones.** We urge you to oppose this ordinance in order to defend our agricultural economy, rural areas, and encourage responsible, legitimate agritourism.

Broadly stated, the primary reasons to vote No are:

- **The MDC Agricultural Practices Board, composed of long-established farmers and rural stakeholders, has passed multiple resolutions opposing the ordinance in its entirety. The Miami Countryside Agritourism Association and Redland Homes & Farms Association also oppose the legislation.**
- **7B authorizes a variety of commercial and entertainment uses under the rubric of “agritourism,” but goes beyond the definitions in Florida Statutes to authorize uses unrelated to bona fide agricultural production.**
- **Increased commercial uses including food service, alcohol production, and construction of structures for the general public will substantially increase on- and off-site impacts such as noise, traffic, solid and liquid waste production, and air pollution. The cumulative impacts are detrimental to continued growing operations and contradict multiple Comprehensive Development Master Plan Objectives and Policies.**
- **Creating the “Krome Agritourism District” imperils as many as 12,700 acres of productive agricultural land, putting the viability of the entire agricultural sector at risk.**
- **Permitting expanded commercial activities unrelated to bona fide agricultural production on Agricultural Use (AU) land outside the Urban Development Boundary (UDB) degrades the effectiveness of the UDB and would be unsupported by the infrastructure necessary for public health and safety.**

Due to the broad scope of this legislation and its potential to radically alter usage patterns for thousands of acres of productive land, the BCC should follow the administration’s recommendation and consider the proposed changes as an application in the CDMP process. The diversity and intensity of proposed commercial and entertainment uses require review and analysis commensurate with the extensive economic, social, and environmental impacts that would be created by approving this ordinance.

Miami-Dade's Agricultural Economy In The Balance

The UF-IFAS Agricultural Lands Study released last year determined that accelerating development outside the UDB posed an existential threat to MDC's \$1.55 billion agricultural economy and the unique lifestyle and recreational opportunities rural communities provide. The study identified 67,889 agricultural acres outside the UDB and concluded that a minimum of 64,800 acres were required to sustain an agricultural economy through 2030. Among the study's recommendations to sustain agriculture were to preserve the UDB in order to maintain sufficient supply of land for agricultural production and to promote carefully managed agritourism activities to provide supplemental revenue to bona fide farming operations. Any policy change to AU usage should incorporate these recommendations to determine consistency with MDC policy to encourage agriculture.

A primary reason for the UDB's existence is to preserve land for use by the agricultural sector. By extending the range of acceptable uses on AU land to include activities previously limited to designations inside the UDB, the utility of the UDB is diminished. **As one farmer put it, "This moves the UDB without moving the UDB."** We urge the Board to maintain the sensible standard requiring lands with Agricultural Use designations to be limited to activities directly involved in, related to, and supportive of agriculture.

Moreover, since the expanded uses in the ordinance can be applied in whole or in part on any land zoned AU, up to 49% of agricultural land countywide will be at risk of being permanently removed from agricultural production. If even a small portion of that 49% is dedicated to other uses, MDC will fall below the minimum viable acreage threshold stipulated in the Agricultural Lands Study. This contradicts long standing MDC policy articulated by the BCC and embodied in the CDMP.

HTL supports genuine agritourism and compatible rural economic activity, and we have heard heartfelt testimonies from many established local agritourism proprietors opposing this ordinance. Bona fide agricultural operations already have the right to conduct agritourism activities guaranteed by Florida statute 570.65. While the ordinance states its intent to promote agritourism by reducing the requirement for commercial uses in rural areas to be linked to bona fide agricultural activities, the ordinance introduces competition to established agritourism operations.

Before voting, Commissioners should consult with RER and Miami Dade Police and Fire to estimate the additional resources required to perform effective code enforcement and maintain public safety as a consequence of expanded activities. Regulations exist not only to enforce standards but to maintain the public's trust in a reasonable expectation of physical safety and a sanitary environment when entering a facility or attending an event. Implementing the ordinance without enhanced enforcement will eventually result in an injury, illness, or worse, which will tarnish the reputation of the entire agritourism sector.

Local residents have highlighted the extensive record of code violations, including multiple cease and desist orders, involving properties that would gain relief from this ordinance. It appears that some locations promoting agritourism activities are replacing agricultural production by building new structures, which are currently out of compliance with code, and support commercial or entertainment activities. Every row of crops paved over, grove of trees chopped down, or horse barn turned dance floor pulls another thread from the fabric of a viable agricultural economy. Expanding uses in this area will further strain the overburdened Code officers and first responders working tirelessly in these

areas.

A Better Way Forward

All stakeholders have been placed in a difficult position by the lack of detail in the Florida agritourism statute. The BCC should seek a comprehensive evaluation and definition of agritourism rules in Florida statutes and County Code. Until then, applying the precautionary principle to requests for new uses is the course of action most likely to reduce harm to established land use practices. If passed, the ordinance will green light the repurposing of land essential to the survival of Miami-Dade's agricultural sector.

There are elements of this ordinance that have merit, particularly administrative relief from the need to obtain a Certificate of Use for many standard agricultural activities. The Agricultural Practices Board and participants in the Redland Charette suggested these consensus measures could be introduced as discrete legislative items and would face little opposition.

We propose a simple test: Commissioners should review each provision of this ordinance with one simple question in mind: **Does this measure serve to preserve or increase legitimate agricultural production or agritourism as defined by Florida statute?** If the answer is no, why is it included and appropriate for properties designated for Agricultural Use, many of which receive a tax exemption explicitly linked to agricultural production? The attempt to shoehorn incompatible commercial activity onto agricultural use properties is fundamentally misguided. Surely Commissioners would be reluctant to support an ordinance authorizing irrigation pumps, manure application, and tractors adjacent to their constituents' homes or businesses inside the UDB.

Heed the advice of the experts and practitioners on the Agricultural Practices Board. There is no shortage of restaurants, breweries, waterslides, or miniature golf courses that demands urgent action. On the contrary, dwindling agricultural lands are an acute and growing crisis. Rushing to approve this suite of changes creates unforeseeable, irreversible consequences and exposes our rural communities, agricultural economy, and the general public to unacceptable risks. This ordinance should be divided into manageable, germane parts or moved into the CDMP process as recommended by the administration to allow for public input and evaluation. It is vital to the future of Miami-Dade that this is resolved correctly, not expediently. Thank you for your time, and please vote No on 7B.

Sincerely,



Laura Reynolds

**Organizing Representative
Hold the Line Coalition**

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