


# Memorandum



**Date:** May 11, 2021

**To:** Honorable Chairman Jose “Pepe” Diaz  
and Members, Board of County Commissioners

**From:** Daniella Levine Cava  
Mayor 

**Subject:** Transmittal of Final Urban Expansion Area Report (provided pursuant to CDMP Policy LU-8J)

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The attached final report is being transmitted to the Board in fulfillment of CDMP Policy LU-8J, adopted by the Board on July 22, 2020. The policy states “by no later than the time to file an application in the May 2021 CDMP Amendment Cycle to amend the Urban Expansion Areas (UEA), Miami-Dade County shall complete a study of (i) additional areas that may be identified as urban expansion areas, with a goal of replacing the 1,993 acres that were proposed for removal in Application No. 5 of the Evaluation and Appraisal Report amendments in the May 2019 CDMP Amendment Cycle, and (ii) potential additional uses that would be appropriate for the urban expansion areas, particularly near the Homestead Air Reserve Base. A draft of this study shall be made available for review by the public by March 15, 2021”. As required by Policy LU-8J, a draft version of the study was made available for public review on March 15, 2021. Comments received during the public review period, as contained in Appendix 6 of the report, were considered in the final report.

Pursuant to Section 2-116.1 of the Code, applications to amend the Urban Expansion Area boundaries can only be filed between January and May in odd-numbered years. While the identification of new UEAs does not move the Urban Development Boundary (UDB), it does have implications for future growth. The UEAs represent areas that the County has prioritized for future growth once there is a demonstrated need to move the UDB. The timing and location of those designations signal the County’s vision for the future of our community to our constituents and the elected officials that will someday succeed us. The County has committed significant resources to supporting a robust transit system, improving the ecological health of the Everglades and Biscayne Bay, and making the County more resilient to the impacts of coastal storms and climate change. Decisions on how to guide future growth must work in conjunction with these efforts. The focus is not on stifling growth, but rather guiding it in a responsible way.

Among the primary considerations when assessing the need for new Urban Expansion Areas is the development capacity inside the current UDB and UEAs. The UDB and UEAs are tools used to plan for near-term and long-term growth while protecting important resources. The County’s near-term planning period, currently 2030, serves as the planning horizon for the UDB and land use patterns and densities expressed on the Land Use Plan map, as well as for near-term facility planning. The long-term planning period, currently 2040, is used principally for identifying areas most appropriate for long-term urban growth, including the UEAs, and facilities with long-term consequences. **The recommendations provided in the**

**final report are underpinned by analysis demonstrating that the UDB and UEAs, including proposed contractions, are sufficient to accommodate long-term population growth beyond 2040.**

It is important to recognize that almost all areas along the UDB that are outside of current UEAs are constrained in some way. There is no perfect area, and the identification of almost 2,000 acres of new UEA, as directed by Policy LU-8J, requires a balancing of those constraints against the County’s future land needs. The final report identifies two Analysis Areas that attempt to best balance those considerations: a ±1,398-acre area located in the Northwest Lake Belt (Analysis Area 1A) and a ±596-acre area located along the South Dade Transitway (Analysis Area 3A). However, analysis showing that the County currently has sufficient countywide supply of residential and non-residential land beyond the long-term planning horizon of 2040 provides an opportunity to thoughtfully time the designation of new UEAs.

Four issues from the public comments received on the draft report warrant additional discussion: 1) the County should first look to areas along the South Dade Transitway when identifying new areas for future growth; 2) there are concerns about whether the designation of a UEA within the North Lake Belt Comprehensive Everglades Restoration Plan (CERP) boundary will hinder restoration efforts; 3) the County should avoid substantial losses of agricultural land; and 4) there are concerns about whether the UDB is affecting housing affordability. These issues are discussed in more detail in the following paragraphs.

As changing conditions have made some areas less suitable for future growth, other areas have been made more suitable for future growth. Such is the case with Analysis Area 3A (±596-acres) located along the South Dade Transitway. The County has made significant efforts to improve transit along the corridor and to support it with appropriate land uses that provide ridership and funding for those improvements. The presence of this high-volume transit service would allow the area to accommodate a significant amount of residential capacity with minimal loss of agricultural land. As depicted on Table 2.1 of the UEA Study, the countywide demand for residential uses is projected to be approximately 10,000 units per year in 2040. It is estimated that Analysis Area 3A has the capacity to support over 17,000 units, which represents over 1.7 years of residential capacity. The area could also support a significant amount of non-residential capacity.

In 2019, the Department of Regulatory and Economic Resources (RER) Planning Division studied a larger 920-acre area that included a portion of Analysis Area 3A for possible designation as a UEA. Concerns raised by the community at that time included impacts to the rural character of the area, loss of agricultural land, traffic congestion, and inadequate infrastructure and services. This UEA Study analyzed a smaller area than what was previously studied in 2019. Based on public comments, this revised area appears to be more palatable. **However, an Urban Expansion Area should not be designated in this area without the concurrent adoption of policies to ensure protection of Natural Forest Communities, appropriate land use transitions to agricultural uses, and additional public outreach to ensure that the concerns of the community are addressed.** It is important to reconcile the policies of the CDMP to recognize the County’s efforts to provide

transit-supportive land uses along the South Dade Transitway. To that end, it is recommended that CDMP Policy LU-8G(i)(d), which identifies the area south of SW 184<sup>th</sup> Street as an area that “shall not be considered” for expansion of the UDB, be amended to exclude areas that are generally located within one half mile of the South Dade Transitway.

The Comprehensive Everglades Restoration Plan (CERP) represents the single greatest opportunity to dramatically improve the ecological health and function of the Everglades and Biscayne Bay, goals that have been prioritized through the CDMP and other policies adopted by the Board. The County must remain steadfast in its support of CERP and the much-needed federal and state funding that it can provide to accomplish these important goals. For Analysis Area 1A, 634 acres out of the 1,398-acre Analysis Area include portions of the North Lake Belt CERP project. Uncertainty about the viability of the North Lake Belt CERP in-ground reservoir project has existed since the time it was authorized and continues today. Deauthorization of the pilot project that was planned to test the viability of in-ground storage in the Lake Belt likely hindered efforts to confirm its viability. The CERP Biscayne Bay and Southeastern Everglades Ecosystem Restoration (BBSEER) project is offering a renewed look at the North Lake Belt project and may offer alternatives to retain its anticipated benefits. Much will be learned over the next few years. If the identified area is found to be infeasible or unnecessary for CERP, it could have potential for future non-residential growth. **To that end, an Urban Expansion Area should not be designated in this area until it can be positively affirmed that the designation would be consistent with CERP goals.** In addition, any future designation of a UEA in this area should include the concurrent adoption of policies to ensure compatibility with nearby rockmining uses and adequate protection of wetland functions.

**Minimizing the loss of agricultural land is a key consideration when identifying areas for future growth.** Encouraging agriculture as a viable economic use of land is a long-standing principle of the CDMP. Further, CDMP Policy LU-1R states, in part, that Miami-Dade County shall take steps to reserve the amount of land necessary to maintain an economically viable agricultural industry. Decisions on whether the County should strive to maintain agriculture as an \$800M+ industry are policy choices. However, depletion of agricultural land below a certain threshold may lead to a loss of the economies of scale enjoyed by the industry and an associated reduction in agricultural support services, including packing houses and agricultural research. It is not easy to determine where that tipping point lies. A 2002 study by County Planning staff analyzed this issue by projecting future land needs for the County’s major agricultural products and the anticipated loss of agricultural land due to urbanization. The analysis showed a need for 51,885 acres for agriculture in 2025. It is important to recognize that the analysis is almost twenty years old, and the County would benefit from an update. The 2002 study built on data from a larger analysis conducted by the University of Florida Institute of Food and Agricultural Sciences (UF-IFAS) with financial support from the Florida Department of Agriculture and Consumer Services. The larger study provided important data on agricultural commodity trends that informed the County’s report. **It is recommended that a CDMP policy be added directing completion of a study, in partnership with a research institution, that identifies the amount of land needed to maintain an economically viable agricultural industry and the associated challenges with maintaining the necessary acreage.** The study will

commence upon identification of a funding source, which may include grant funding, if available. This recommendation is reflected in the final report.

Some of the public comments centered on the need to expand single-family residential capacity and replace acreage from the areas of the proposed contractions, particularly south of UEA No. 2. While some areas may be suitable for such uses, it is important to recognize that, in addition to the analysis regarding agricultural lands presented above, other constraints affect the development of additional residential density in this area. Approximately 300 acres in the area is located within the Outer Safety and Runway Protection Zones for Miami Executive Airport. In 2019, the Board adopted airport land use compatibility standards to address airport operational matters, Florida statutory changes, and Federal Aviation Administration guidance. The regulations prohibit new residential construction, educational facilities, hospitals, religious facilities, and other buildings for public assemblage within the Outer Safety Zone and Runway Protection Zone for the County airports. Therefore, these areas would not be eligible for residential density increases.

As depicted on Figure 22 of the report, portions of the area are located within one mile of express bus routes located at SW 104<sup>th</sup> Street (Killian Kat) and SW 152<sup>nd</sup> Street (Coral Reef Max), however the area is not served by high capacity transit. Therefore, the remaining area between UEA No. 2 and SW 184<sup>th</sup> Street would only be expected to support densities that are close to the minimum allowable for UDB expansion applications (10 du/acre). At these densities, 1,000 acres would be depleted to supply one year of residential capacity. Given that the area south of UEA No. 2, particularly north of SW 152<sup>nd</sup> Street, contains the County’s larger agricultural parcels, loss of agricultural land in this area may have detrimental impacts to the diversity of the County’s agricultural industry. Identification of new UEAs that would result in the depletion of a significant amount of agricultural land should not occur until additional analysis is obtained on the impact it would have on the agricultural industry through the aforementioned study.

**Moving the UDB cannot be our affordable housing strategy.** Miami-Dade County, like other major metropolitan areas, has experienced sharp increases in housing costs in recent years, which have only heightened our challenges in addressing housing affordability. However, it is not possible to isolate the Urban Development Boundary as a contributing factor to housing price inflation. Numerous factors affect the cost of housing, including locational factors, neighborhood amenities, construction cost, and influence of foreign markets, among others. Data provided in the report shows that price fluctuations in Miami-Dade County over time were consistent with the average price increases of other large counties in Florida. While those comparison counties have policies that constrain development in certain areas and prioritize development in other areas, none have a growth boundary as restrictive as Miami-Dade County’s. This comparison thus supports the conclusion that the UDB does not exert significant inflationary pressure on housing prices.

We want our County to remain welcoming to families of all income levels and should make a concerted effort to maintain diversity within our housing supply. However, low density development beyond our UDB is unsustainable and is not the solution to housing affordability or diversity. As stated in the UEA Study, developing 1,000 acres of land outside

of the UDB at the minimum density of 10 dwelling units per acre would only provide about one year of supply and we would continue to be faced with the same challenge year-after-year. The report recommends increasing the diversity of housing options by focusing on increasing the supply of attached single family housing on smaller lots while maintaining the character of established neighborhoods.

CDMP Policy LU-8J(ii) directs the study to address potential additional uses that would be appropriate for the UEAs, particularly near Homestead Air Reserve Base (HARB). Several recent approvals have already liberalized allowable uses in the agricultural area, including in the current UEAs. For example, in the May 2019 CDMP Amendment Cycle, the Board allowed truck parking in UEA No. 3 and eased limitations on agriculturally supportive uses. In 2020, the Board also authorized rural event venues in the agricultural area. Identifying additional uses that may be allowed without expanding the UDB must be balanced against the future growth potential of the UEAs for urban development. **Given that the UEAs represent areas that have been identified for future urban growth, the types of uses permitted in the UEAs during the interim should not create a conflict with that potential future growth.** Additional uses near HARB must also be carefully analyzed to ensure that they do not negatively impact the future viability of the military installation. The recommendations presented in the final report respond to the directive from the Board while providing for these considerations. These include incorporating criteria to address uses that have a unique need to locate outside of the UDB and to reanalyze, by 2030, the County’s truck parking needs.

**Finally, contraction of the current UEAs, as proposed in the May 2019 CDMP Amendment Cycle, should proceed regardless of whether new UEAs are designated.** The proposed contractions were deferred on July 22, 2020 pending release of this final report. Contraction would provide for internal consistency with other existing CDMP policies that govern UDB expansions. The areas proposed to be removed are identified in CDMP Policy LU-8G as areas that “shall not be considered” for UDB expansions. Although approximately 1,282 acres of the 1,993 acres proposed for removal are in private ownership, the contraction areas are not considered to have future urban growth capacity due to these policy constraints. In addition, the remaining 711 acres is already in public ownership. Removing the 1,993 acres will therefore provide a clearer indication of the areas that are available to support future growth and provide for more logical boundaries for the UEAs.

In addition to the discussion of replacement UEA acreage, the report provides recommendations for additional CDMP policies that should be adopted by the Board in light of the UEA analysis. **The eight final recommendations are summarized below and detailed in Chapter 4 of the report.** Advancement of these recommendations, including contraction of the current UEAs, requires Board sponsorship.

- 1) Amend CDMP Policy LU-8G(i)(d), which identifies the area south of SW 184th Street as an area that “shall not be considered” for expansion of the UDB, to exclude areas that are generally located within one half mile of the South Dade Transitway. Additionally, any future designation of a UEA in the ±596.5 acres located along the South Dade SMART Plan Corridor (“Analysis Area 3A”) should include the concurrent adoption of policies to ensure protection of Natural Forest Communities,

appropriate land use transitions to agricultural land, and additional public outreach to ensure that the concerns of the community are addressed.

- 2) Any future designation of a UEA in the ±1,398.8 acres located in the North Lake Belt (Analysis Area 1A) should not occur until it can be positively affirmed that the designation would be consistent with Comprehensive Everglades Restoration Plan (CERP) goals. In addition, any future designation of a UEA in this area should include the concurrent adoption of policies to ensure compatibility with nearby rockmining uses and adequate protection of wetland functions.
- 3) Establish criteria for urban-type uses that have a unique need to locate outside of the Urban Development Boundary.
- 4) Add a policy to the CDMP to reevaluate truck parking demand by 2030 to determine whether the current land supply is sufficient.
- 5) Add a policy to the CDMP to identify opportunities to increase the diversity of housing options inside the Urban Development Boundary with particular focus on increasing the supply of attached single family housing while maintaining the character of established neighborhoods.
- 6) Provide for continued County governance over land that is located outside of the Urban Development Boundary.
- 7) Define the boundaries of the Redland area for purposes of CDMP Policy LU-8G following consideration of community input.
- 8) Add a CDMP policy directing completion of a study, in partnership with a research institution, that identifies the amount of land needed to maintain an economically viable agricultural industry and the associated challenges with maintaining the necessary acreage. The study will commence upon identification of a funding source which may include grant funding, if available.

A summary of substantive changes from the draft report (dated March 10, 2021) to the final report is included as an attachment to this memorandum. If you have questions regarding this information, please contact Lourdes Gomez, AICP, Director of Regulatory and Economic Resources at (305)375-2886 or [Lourdes.Gomez@miamidade.gov](mailto:Lourdes.Gomez@miamidade.gov).

#### Attachment

- c: Geri Bonzon-Keenan, County Attorney  
Gerald Sanchez, First Assistant County Attorney  
Jess McCarty, Executive Assistant County Attorney  
Office of the Mayor Senior Staff  
Jimmy Morales, Chief Operations Officer  
Lourdes M. Gomez, Director, Department of Regulatory and Economic Resources  
Jennifer Moon, Chief, Office of Policy and Budgetary Affairs  
Yinka Majekodunmi, Commission Auditor  
Melissa Adames, Director, Clerk of the Board

**Miami-Dade County Urban Expansion Area Study**  
**Summary of Changes from the Draft Report to the Final Report**

Date: May 7, 2021

Listed below are substantive changes to the Urban Expansion Area Study from the draft report (dated March 10, 2021) to the final report (dated May 7, 2021). A document depicting all changes is available upon request from the Department of Regulatory and Economic Resources, Planning Division.

- 1) The Development Capacity Methodology (Appendix 2) was amended to include the methodology for commercial and industrial land capacity.
- 2) Chapter 3 (Detailed Analysis Areas) was amended to include additional discussion on the likelihood of areas containing archaeological resources.
- 3) A study completed in 2002 by Miami-Dade County Department of Planning and Zoning titled "Urban and Agricultural Land Use Trends and Projections" was added as Appendix 5 to the report.
- 4) Comments received during the public comment period (March 15, 2021 through April 19, 2021) were added as Appendix 6 to the report.
- 5) The Executive Summary was amended to indicate the amount of the proposed UEA contraction area, as presented in the May 2019 CDMP Amendment Cycle, that is in public ownership.
- 6) "Figure 19: Generalized Commute Patterns" of Chapter 2 was amended to correct the number of commuters depicted on the map. This change did not affect the commute patterns depicted on the map.
- 7) "Figure 22: Mass Transit Availability" of Chapter 2 was updated to remove the proposed SMART Plan Bus Express Rapid Transit station at SW 136<sup>th</sup> Street and SW 157<sup>th</sup> Avenue based on communication from Miami-Dade County Department of Transportation and Public Works indicating that the tentative location for the station has moved east to SW 137<sup>th</sup> Avenue.
- 8) Within Chapter 4 (Recommendations), Recommendation No. 1 from the draft report which addressed both Analysis Area 1A and Analysis Area 3A was separated into new Recommendation Nos. 1 and 2 addressing each area individually and expanded to include new recommendations.
- 9) Chapter 4 (Recommendations) was amended to add a new Recommendation No. 8 adding a CDMP policy directing completion of a study, in partnership with a research institution, that identifies the amount of land needed to maintain an economically viable agricultural industry and the associated challenges with maintaining the necessary acreage.
- 10) Chapter 4 (Recommendations) was amended to add flexibility related to the proposed creation of standards addressing uses that have a unique need to locate outside of the Urban Development Boundary.
- 11) Chapter 4 (Recommendations) was amended to clarify Recommendation No. 6 which proposes to identify areas located outside of the UDB as areas that cannot be annexed.

*Copies of the draft UEA Study, dated March 10, 2021, can be obtained from the Department of Regulatory and Economic Resources, Planning Division.*