

**April 27th, 2022**

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

[district12@miamidade.gov](mailto:district12@miamidade.gov)

**RE: Aligned Real Estate Holdings LLC application to expand the Urban Development Boundary via CDMP Amendment Proposal CDMP20210003**

Dear Chairman Diaz,

The Hold the Line Coalition reached out to university experts and technical experts across a variety of fields and disciplines to review, gather facts on, and provide technical input on, and a thorough analysis of, proposed CDMP Amendment #CDMP20210003 and claims the Aligned Realty applicant has advanced in support of the application. The committee of experts, including scientific and technical experts from a variety of disciplines relevant for assessing the merits and potential impacts of the application, has been meeting since December of 2021.

The committee’s report, which is attached, points to sea-level rise, pollution and hydrologic off-site impacts, habitat impacts and conflicts with efforts to restore and protect Biscayne Bay as serious issues, risks and threats posed by this massive proposal. The site occupies the low-lying coastal plain. The seasonal king tides already cause flooding in eastern portion of the site. The proposed development would straddle the C-102 canal, the primary outlet for stormwater drainage from the Princeton Basin. This site was identified in 2005 for inclusion in the Biscayne Bay Coastal Wetlands project, now part of the Biscayne Bay Southern Everglades Ecosystem Restoration project and that is an ongoing planning effort that is important for bay recovery.

The applicant has not provided sufficient justification for why this project must be located in the specific parcel identified. We encourage working within the many acres of land within the UDB currently zoned for industrial use, including over 500 acres in the South Dade area specifically zoned for this purpose.

The main findings of the committee’s report are as follows:

- 1. The applicant has failed to provide the information that is needed to adequately assess both the foreseeable risks and the potential benefits of the proposed development.**

Aligned Realty’s proposal is based on a cursory analysis and presumably genuine confusion over the nature and functioning of the local hydrologic system as well as the status of ongoing environmental restoration efforts. The stormwater analysis is clearly insufficient to even begin accounting for the potential impacts of the project.

The stormwater and drainage analyses are vital to the health and safety of county residents and the preservation of county resources. County staff and multiple state agencies have consistently noted that the applicant has not provided sufficient information to allay their concerns that the project would not impact regional flood protection operations, surrounding property and resources or contradict established county goals.

The applicant's cursory assessment of potential stormwater impacts on adjacent properties relies on overly simplistic and insufficient methods using land elevation data as the principal data point; such claims are not credible without a comprehensive engineering and environmental analysis of the entire site and surrounding area. The applicants base their stormwater calculations on a conceptual 40-acre site to determine the height of the perimeter berm which presumably will surround the entire project. The site, however, is about 20 times larger than the conceptual model, and the applicant's attempt to scale-up a stormwater management plan is impractical, overly-simplistic, and invalid.

The applicant also uses inappropriate values in several of its calculations. For instance, the 100 year 3-day rainfall is 16 inches but the calculation uses a credit of 3.28 inches with little or no explanation as to the basis for this adjustment. In addition, the applicant does not anticipate future extremes, which must be considered in the context of climate change including sea level rise. The applicant also does not account for recent evidence indicating that stormwater retention ponds retain only about 50 percent or less of the nutrients they are designed to capture.

Because the C-102 East basin is largely undeveloped and agricultural, the part of the basin where the project is located provides flood storage during storms. That storage is extremely important to maintain flood protection in the region, particularly for the residential areas in the C-102 west basin. Paving and elevation of the property will eliminate those benefits and may be detrimental to the flood protection operation of the entire C-102 basin particularly in view of future sea level rise without addressing the regional flood protection of the entire basin under future conditions.

Aligned Realty's project plan states that the project site's topographic elevation will be increased by more than 8 feet. This is proposed to be accomplished by adding many tons of fill and will likely have unintended consequences. There is a high likelihood of groundwater mounding in this large, elevated site compared to surrounding neighborhoods. Such a mound may change the groundwater flow patterns resulting in propagation of mounded groundwater toward residential areas to the north, west, and southwest of the site.

The Florida Department of Environmental Protection's review of the project noted that "substantial analysis" will be required to assure compliance with state regulations governing discharge to Outstanding Florida Waters, specifically Biscayne Bay. Changes to the application filed in February 2022 include the redirection of Canal C-102, which would require the approval of the South Florida Water Management District. The District has not yet analyzed this proposal, and there is no clear evidence that the applicant has performed sufficient analysis to justify the agency granting their request.

**2. In the short term, the proposed development risks increased flooding on adjacent properties, increased saltwater intrusion in the Biscayne aquifer, harm to wildlife, and decreased health of Biscayne Bay.**

Currently, the land's use for agricultural operations provides stormwater and flood management, protects against saltwater intrusion by allowing infiltration into the aquifer, facilitates flow of freshwater to Biscayne Bay, reduces nutrients in water reaching Biscayne Bay, and provides critical land and edge habitat. The development of the site for industrial and commercial use will permanently alter the hydrology of the site by raising the land surface elevation by more than 8 feet and paving over large portions of the parcel, largely eliminating or even reversing these benefits.

In its current state, the low-lying site is perfectly suited to perform hydrological functions essential for protecting the developed areas just to the west and north. The site is located near the mouth of the

watershed and is in a critical location for the restoration of Biscayne Bay. Historically, , water flowed through freshwater sloughs that extended northwestward to the Everglades through the coastal ridge, known as transverse glades, and across the coastal plain into Biscayne Bay. The C-102/Princeton canal follows the path of one of these transverse glades. The parcel is able to provide a pathway to deliver more freshwater, store water during the wet season, help clean-up watershed runoff and create sheet-flow through the coastal mangroves before the water reaches Biscayne Bay.

Aligned Realty claims that the SDLTD development project will improve the health of Biscayne Bay - that the total nutrient loads will be reduced from 1,058 KG to 278 kg per year, based on the combined loading of nitrogen and phosphorous. This assertion, however, over-states the amount of fertilizer currently used on site, and misunderstands the scale of the problem of nutrient pollution in Biscayne Bay and the current conditions in the area. Mainly, the applicant appears to misunderstand, the hydrologic function in the area, the environmental needs of Biscayne Bay, and the status of current environmental restoration projects and initiatives.

Our assessment of the impacts of development at this site leads us to conclude that it is likely to impair the health of Biscayne Bay. We examined the available data on water quality and flow in the C-102 canal throughout the Princeton/C-102 basin and from adjacent areas on the coastal plain. The site comprises approximately 2.5 percent of the C-102 basin area; and less than 5 percent of the total agricultural area in the basin. Therefore, the potential benefits to Biscayne Bay of completely eliminating runoff from this site from reaching the bay are small compared with the much larger amount of nutrients contributed from the rest of the basin. Our analysis of water quality data leads us to conclude that development will not eliminate it as a source of pollution, as the applicant claims. Surface runoff and pollution captured the stormwater management system likely will reach Biscayne Bay via a groundwater pathway; the Applicant's analysis does not take this into consideration. But, more significantly, development of this site removes the possibility of using the site to reduce the larger amount of nutrients that reach Biscayne Bay from the rest of the basin.

Further, if allowed to proceed, the proposed development will increase the risk of injury and death for endangered and other species in the area from the loss and disruption of feeding areas on the proposed site. The SDLTD site report lists 7 endangered species found on or near the proposed development site, and the distance of the proposed development to nearby critical habitat boundaries ranges between .77 and 1.52 miles. The Applicant's proposed development site report invalidly minimizes the potential harm and risk for endangered and other species currently residing or using the proposed development site.

### **3. Development will drastically alter the site, precluding its use for environmental restoration projects and hampering efforts to protect and enhance the natural resources of Miami Dade County.**

The South Florida Water Management District and Army Corps of Engineers are currently planning the implementation of the BBSEER project, which will address the agricultural drawdown issue alluded to by the Aligned Realty, reduce nutrient loading in Biscayne Bay, increase water storage and recharge capacity, increase flow of freshwater to Biscayne Bay, and improve wildlife habitat conditions, among other positive impacts on the Biscayne Bay system and surrounding areas. In the vicinity of the proposed SDLTD site, the BBSEER aims to increase the resiliency of coastal mangroves, improve ecological and hydrological connectivity north and south along the coast, and improve the quantity, timing and distribution of freshwater inflow to estuarine and nearshore subtidal areas of Biscayne National Park, and reduce the damaging pulsed releases of water to the bay from drainage canals. BBSEER is also slated to provide recreation opportunities.

The site occupies a geographical location that is central to the overall success of the BBSEER project. Almost 50 percent of the SDLTD site is within the boundaries of the land designated by the Comprehensive Everglades Restoration Plan (CERP) to be a Miami-Dade County Water Preservation Area. The CERP plan Phase II plan includes more than 2/3's of the total land area within the boundaries of the proposed SDLTD Site. CERP planners currently have 13 alternative projects, and this property is included within many of those alternatives. The Project Delivery Team is currently moving forward with modeling the different alternatives for consideration by the team.

Development of the site would limit the ability of the County to employ nature-based solutions to mediate the impact of sea level rise on surrounding properties. These are preferred over more expensive "hard" shoreline protection, such as flood walls. Miami Dade County municipalities have begun allocating significant funds towards land-protection in order to provide these natural buffers. North Bay Village, for example, has a proposal to spend \$5 Billion to acquire land for protection. We should prioritize saving land for protection from sea level rise. Restoring the site to its former status as a freshwater wetland is feasible and offers both immediate and long-term benefits. Restored freshwater wetlands on the 763 acres would generate \$12.6 million per year in ecosystem services. The site also overlaps conservation areas designated for the Agricultural Drawdown Dewatering Wells.

**4. The applicant's estimate of the number of new jobs, the main benefit claimed for the project, is greatly exaggerated, at best, and probably just wrong given the absence of a specific development plan for Phase III.**

The initial May 2021 proposal proclaimed that the project would create 25,000 new jobs. The applicant later lowered the estimates of permanent jobs by 32% to 17,446 while keeping the original estimate of 13,000 construction jobs. The applicant now claims their project will produce "more than 11,000 jobs to South Dade over the next 10–15 years." These ever-shifting estimates have been consistently critiqued on technical and professional grounds.

Aligned Realty's job-creation estimates are based on flawed data, outdated methodology, and an unsubstantiated assumption of the participation of landowners in the designated Phase III development location. Specifically, the applicant misrepresents employees per square foot calculations based on methodologies that do not match modern warehouse practices. The applicant also fails to account for job losses as a result of this project. The result of this flawed and misleading methodology is a significant exaggeration of jobs creation numbers.

Warehouse automation is projected to continue or accelerate to reduce labor costs for the foreseeable future at a rate of 10 percent per year, further reducing the number of direct jobs for the SDLTD site. For example, a 5,000 worker warehouse would need only 399 workers after 25 years of operation from automation. If the automation trend continues to increase as projected—for example by 1 percent per year above the 10 percent per year, after 25 years the same facility would need only 10 workers to continue at the same or higher levels of productivity (Research and Markets, "Warehouse Automation - Robots, Technologies, and Solutions Market, 2021-2030," Report 5342799).

Our independent analysis was based upon current methodologies of the IMPLAN model that indicate the number of temporary construction jobs to be created would be 17% of what the applicant has claimed. Similarly, the actual direct jobs the applicant claims is over-estimated by 56%, leaving South Dade with a total maximum of 5,000 new direct jobs. These numbers will be proportionately less if the full 800 acres are not built out, and there are uncooperative landowners who may want to continue farming or have a different plan for the future. The applicant can only speculate that it will be able to acquire the land necessary for the full build out of phase III which is assumed in its job estimates. Absent the

development of phase III, the expected jobs would be less than 3,000 direct warehouse jobs, and only 270 temporary construction jobs. (See pp. 9-15 of Full Committee Report.)

**5 . The proposed development would impose significant and difficult-to-estimate costs on the County related to increased demand on municipal services (water, sewer, traffic) and to increasing the footprint of infrastructure at risk to sea-level rise.**

Should the proposal be approved, county taxpayers would be expected to provide the infrastructure and tax incentives to attract new industry. The SDLTD development will require the construction of all new infrastructure for municipal water and sewer over the entire site. The applicant estimates that water use by the SDLTD will be 246,085 GPD (Table 5). We believe the best estimate of water use by the SDLTD will be 1.3 million GPD, nearly six times the amount reported by Aligned Realty. All of this is new water demand. Aligned Realty equates current water use for agriculture, supplied by on site wells, with the use of municipal water and sewer services, to be supplied by the County, at the proposed facility. This is misleading and inappropriate. Currently, irrigation for onsite agriculture is self-supplied without municipal assistance or infrastructure and any excess water percolates to groundwater to recharge the Biscayne aquifer system directly. Actual water use for agriculture reported by landowners and producers is significantly lower than permitted amounts.

The SDLTD would also impose upon county resources by increasing the amount of infrastructure vulnerable to sea level rise and coastal flooding. The entire parcel is located within the Coastal High Hazard Area. Eastern parts of the site currently flood during the seasonally high “King Tides.” This presents a potential long term drain on county resources, and increases the county’s risk exposure to storm surge. With future sea level rise the flood protection challenge will be further exacerbated unless additional capacity at S21A is provided to ensure the level of service for flood protection in the western part of the basin.

Furthermore, the development of the SDLTD will have severe impacts on aquifer recharge and recovery and exacerbate saltwater intrusion. Protection of the County’s water supply depends on maintaining hydrologic conditions favorable to recharge into the aquifer across the coastal plain. This will exacerbate conditions of saltwater intrusion and degrade county freshwater resources.

**6. Loss of productive farmland will harm the agricultural economy across the entire County.**

As noted previously, Agricultural activities on the site annually produce \$28.6 million of product and labor income of \$18.6 million. Ecosystem services of the current agricultural land use total \$844,000 per year due mostly from existing tropical tree nurseries. The Florida Department of Agriculture and Consumer Services describes the current land use as “an integral part of the vibrant South Dade County agricultural foundation.”

What’s more, this project would pave over approximately 800 acres of land deemed “farmland of unique importance”, forever displacing it’s productive agricultural use. Should the project render surrounding parcels less capable of supporting productive and profitable agriculture, this impact to the county’s agricultural land reserves would be even higher. Previous studies suggest that should agricultural land capacity fall below a certain threshold, the economies of scale which farmers rely upon to remain profitable could begin to unravel, jeopardizing a several billion dollar industry which serves as a major source of employment. The county is currently in the process of reviewing the conditions necessary to maintain a robust agricultural economy, and any action that would disrupt agriculture to this extent should not be considered until that analysis is complete.

## **7. The project will decrease the quality of life of nearby residents.**

The development of this parcel would significantly contribute to urban sprawl, with its predictable attendant impacts on transportation and mobility. The applicant has not conducted a sufficient analysis of the transportation impacts or requirements of this project, nor have they demonstrated the capacity to adequately serve the facility with public transit.

As also stated previously, the applicant has not performed an adequate stormwater assessment that assures that the development of the SDLTD will not increase flood impacts to nearby residential properties or degrade the productive capacity of surrounding parcels currently used for agriculture. The evidence suggests that this massive development would in fact negatively impact surrounding landowners.

The economic impacts on the value of surrounding parcels is also not accounted for. The total value of houses in the four subsections bordering the west and south sides of the proposed project can be expected to decline by up to 20% of their value due to their location and proximity to the warehouse project. On the other hand, studies show an increase from 10 to 20% of home values that are in close proximity to parks and nature sites such as those which may be developed under the BBSEER project. The market has shown that South Dade is an attractive place to live, and the availability of land that has been converted into high-density attached housing that also creates a need for open space and accessible recreational facilities.

## **8. This proposal has been rushed through in a manner that is inappropriate.**

The proposal has been rushed for consideration and has flooded county staff and the public with ever-changing technical arguments and documents since the initial submission over a year ago. The Aligned Realty applicant wants to circumvent the rules that have governed development in Miami-Dade County for the past 50 years. The proposed site is located outside the Miami-Dade Urban Development Boundary (UDB). The applicant seeks an exemption from County planning protocols for the County's Comprehensive Development Master Plan (CDMP). The proposed exemption would allow expansion of the UDB without the normal full analysis to support the proposal. Instead, the applicant proposes to designate the SDLTD site as a "Special District" that would remove the planning safeguards that protect our quality of life.

The applicant submitted the application "out of cycle", and has thus far consistently failed to provide adequate analyses. The Aligned Realty applicants are still seeking approval for core project elements. The UDB was established 50 years ago for the purpose of protecting agriculture and natural areas that provide great benefit to the County. We must adhere to a coherent and measured process in choosing to expand it.

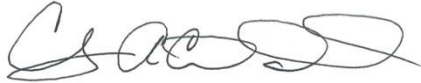
The application would submit four critical changes to the county's Comprehensive Development Master Plan, including weakening of protections against undue development in coastal high hazard areas, incorporation of land outside the Urban Development Boundary into the Urban Development Boundary, and the rezoning of the land in question for the development of the so called "South Dade Logistics and Technological District".

Based on our collective analysis of the materials submitted by the applicant and thorough investigation of the watershed and hydrology in the area the undersigned feel that the applicant has failed to demonstrate that they have met the standards of the County and State requirements and best industry practices and as such feel this application should be rejected on the merits.

**If you have any questions about our work and would like to meet with the team please contact  
Laura Reynolds: 786-543-1926 or email: lreynolds@conservationconceptsllc.org**

Sincerely,


Dr. Christy Crandall



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PhD, Environmental Science, Aquatic and Terrestrial Ecology, FAMU  
MS, Watershed Sciences, Hydrogeology, Colorado State University  
BS, Indiana University Bloomington, Geology, Area Certificate in Environmental Studies  
Former Senior Hydrologist, US Geological Survey  
Research Associate for the Water Resources Center at Florida A&M University

Dr. James Fourqurean



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PhD, Environmental Sciences, University of Virginia  
Professor of Biological Sciences,  
Associate director of the Institute of Environment at Florida International University

Dr. William Nuttle



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PhD, Civil Engineering, Massachusetts Institute of Technology  
Consulting Hydrologist

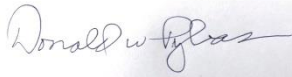
Dr. Jayantha Obeysekera, P.E.,



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PhD in Civil Engineering and Water Resources, Colorado State University  
Registered Professional Engineer  
Research Professor and director of the Sea Level Solutions Center in the Institute of Environment at  
Florida International University, former chief modeler at the South Florida Water Management District

Don Pybas



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MS, Agricultural Resource Management and Development, Texas A&M University  
Former Agent of Sea Grant and  
Retired Miami Dade County Extension Director for the University of Florida

Laura Reynolds



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Current MS Environmental Science Florida International University  
BS Marine Science Jacksonville University  
Founding and Managing Member, Conservation Concepts LLC  
Former Executive Director Tropical Audubon Society

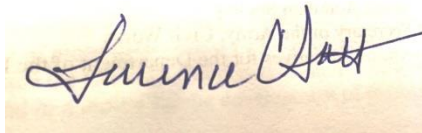
Dr. Richard Weisskoff



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PhD, Economics, Harvard University  
Department Chair and Professor of International Studies, University of Miami

Terrence "Rock" Salt



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MS, Physics, University of Colorado  
Conservation Committee Chair, Tropical Audubon Society  
Former Principal Deputy Assistant Secretary of the Army, Civil Works  
Former Director of Everglades Restoration Initiatives for the Department of the Interior

Cc:

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Commissioner Sally A. Heyman



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Senior Division Chief at Miami-Dade County, Rashid Istambouli, P.E.  
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