

***HOLD THE LINE***  
***COALITION COMMENTS***  
**ON PROPOSED**  
**ON SR-836 EXPANSION**

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# Friends *of the* Everglades



**Conservation Concepts LLC**

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**Urban Environment League**

of Greater Miami

## Proposed 836 Extension



# MDX's Proposed Project

- 14 miles southwest of the SR836
- Overtop the NW wellfield
- On land purchased with Federal, State and local funds for CERP
- Outside UDB
- Destroys appx. 1,000 acres of protected wetlands and farmlands.

# **Inconsistent with Established Local Policies & Programs**

- **Internally Inconsistent with the CDMP**
- **Inconsistent with Climate Compact, 100 resilient Cities, the Seven50 Plan, and with the county Greenprint plan**
- **Invests transportation dollars, infrastructure, and car drivers, and encourages new development there, at the expense of infill & redevelopment, public transit and the SMART plan.**
- **Outdated approach contrary to 21<sup>st</sup> Century planning .**



# Project Area

## CDMP constraints MAP

### *“Shall be Avoided”*

- CERP-Bird Drive Basin, Pensuco Wetlands
- Western Wellfield is bisected by new alignments

### *“Shall NOT be Considered”*

- Active agricultural cultivation and the protected Redlands
- Everglades Buffer Area



# CDMP Goal

A key purpose of the CDMP is:

*that the intensification of **physical development and expansion of the urban area should be managed to occur .***

*. . 3) in locations which **optimize efficiency in public service delivery and conservation of valuable natural resources; and***

*4) in recognition of the County's physical limitations to horizontal expansion due to the location of the **Everglades National Parks, wetlands and environmental preserves, and the County's unique agricultural land resources***

“[U]rban infrastructure is discouraged outside the UDB.”

- **LU-2B. *Priority in the provision of services and facilities and the allocation of financial resources for services and facilities ... shall be given first to serve the area within the Urban Infill Area and Transportation Concurrency Exception Areas.***

# County staff report Page 8-1.11

- **The amendments “could impede the implementation” of this policy.**



# CDMP Transportation Element

**TE-1A.** *The County shall **promote mass transit alternatives to the personal automobile**, such as rapid transit (i.e. heavy rail, light rail, and bus rapid transit, premium transit (enhanced and/or express bus)), local route bus and paratransit services.*

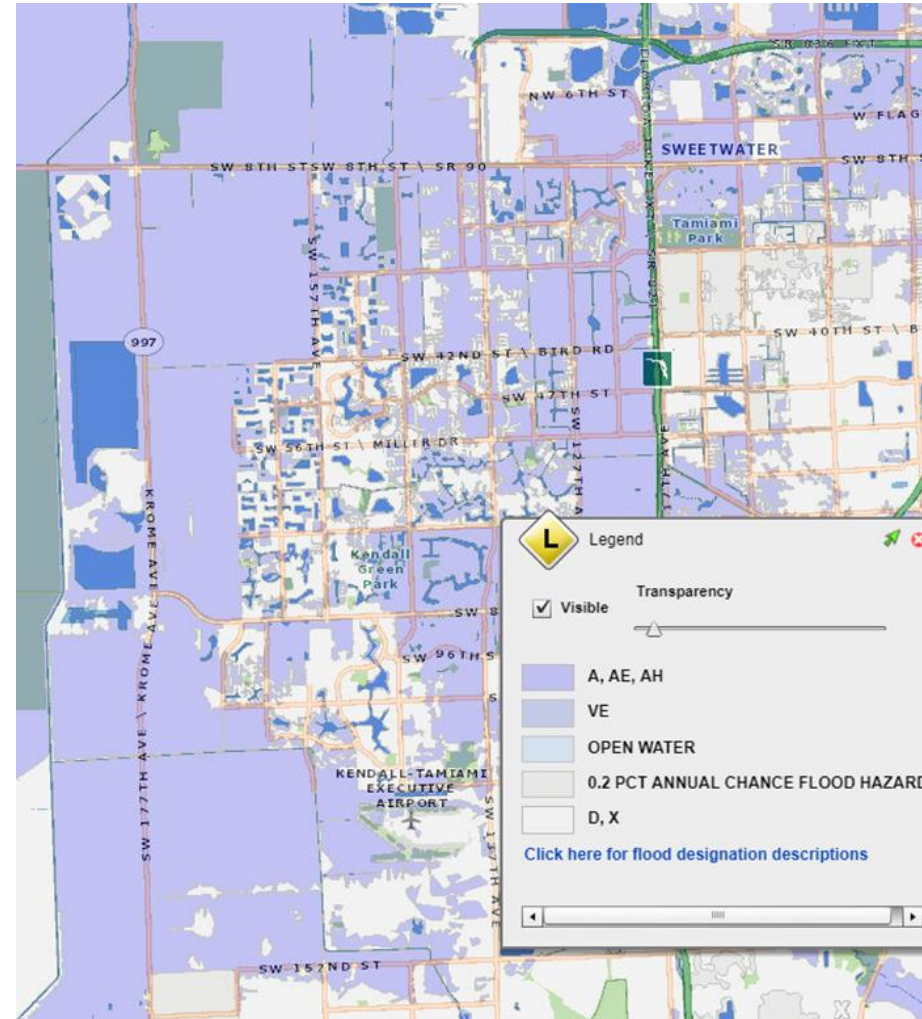


The County staff report finds that the amendments “could impede the implementation” of this policy. Page 8-1.11

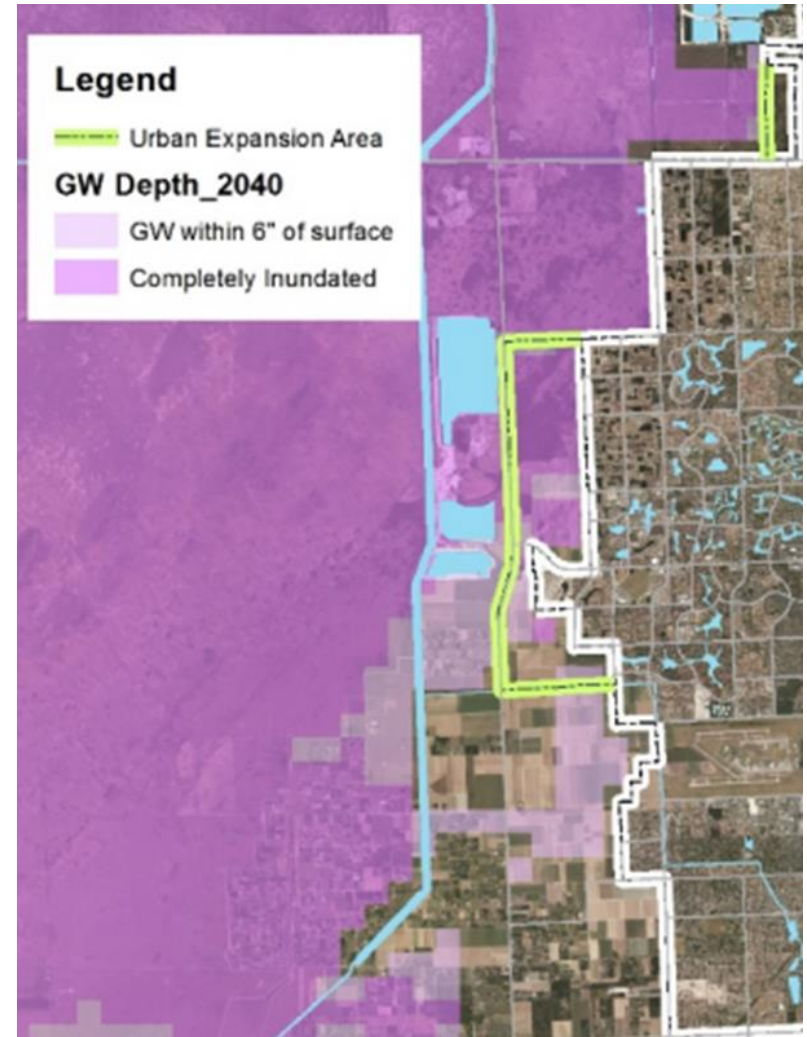
# County Transp. Element

- **TC-6A.** *The County shall avoid transportation improvements which encourage or subsidize increased development in coastal high hazard areas, environmentally sensitive areas ... and areas of high risk of significant inland flooding.*
- 
- **TC-6B.** *Land access interchanges shall not be placed or constructed in a manner that would provide access to environmental protection areas or other areas to be conserved in order to prevent undue pressure for development of such areas.*

# Low Lying and Flood Prone Area



Flood Risk Zones in Project Area



Ground Water Inundation in Project Area

# Major Data & Analysis Gaps

MDX PowerPoint presentation - Page 2 (*Project Need*):

“Congestion causes approximately 3 – hour daily commutes in both directions and a deteriorating quality of life for residents in West Kendall.”

**There is no data whatsoever submitted to support this claim anywhere within the amendment package.**

Page 12 includes a claim that, among the Project Benefits is:

“Improves hurricane/ emergency evacuation routes and travel times.”

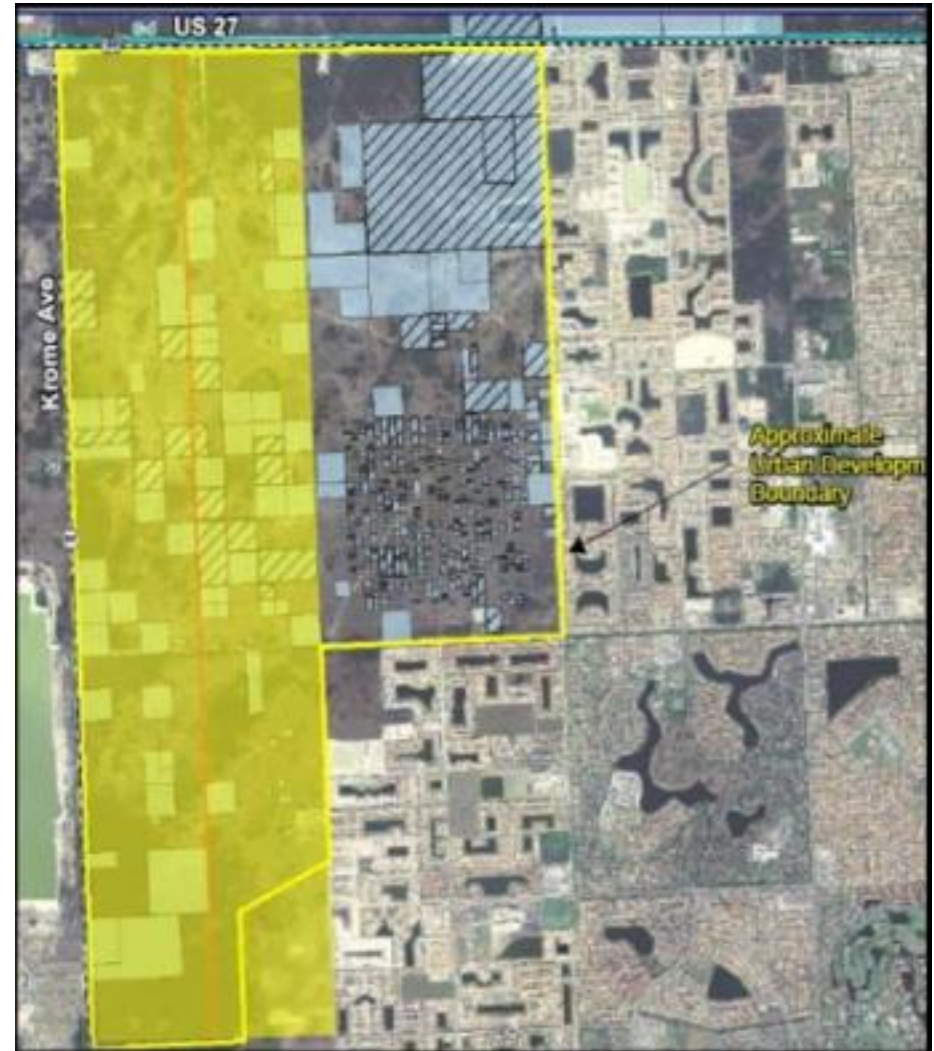
- **There is no data whatsoever submitted to support this claim anywhere within the amendment package.**

# Major Data & Analysis Gaps

- **No Analysis of Impact on Everglades Restoration**

# Conflicts with Bird Drive & North Trail Basins

- The Bird Drive Basin is part of a CERP project that is not yet completed.
- Contain short-hydroperiod wetlands important for endangered species.
- Federal State and Local government have been acquiring lands in this area for a CERP project for 30 years.



Bird Drive Basin Project Area



# Land Acquired for Restoration



## UEA Task Final Report at 36.

(<https://www.miamidade.gov/planning/library/reports/uea-final-report.pdf>)

Bird Drive Recharge CERP project remains as a federally - authorized project and is currently being reevaluated to recapture some of the anticipated project benefits.

Bird Drive Recharge project remains important to Miami-Dade County as a seepage management project to ensure that restoration of water levels does not affect County landowners and to provide the County with water supply to nearby wellfields.

# Objections Based on CERP Impacts

## **Nov 2017 Dep't of Interior Letter:**

Raised the issue that both corridors encroached into the western portion of the Bird Drive Basin needed for the plan.

Since then, the corridor has continued to shift farther west.

## **June 19, 2018 Everglades Foundation Letter:**

Objects because no demonstration the Parkway Won't Conflict w/ CERP

# **Summary Project Impacts**

- **Loss of Farmland**
- **Jeopardizes Water Supply**
- **Advances Suburban Sprawl**
- **Diverts funds from SMART Plan**
- **Destroys Wetlands**
- **Conflicts with CERP**
- **Potential take of Endangered Species**
- **Loss of flood attenuation and resiliency**

# Project Will Worsen Traffic

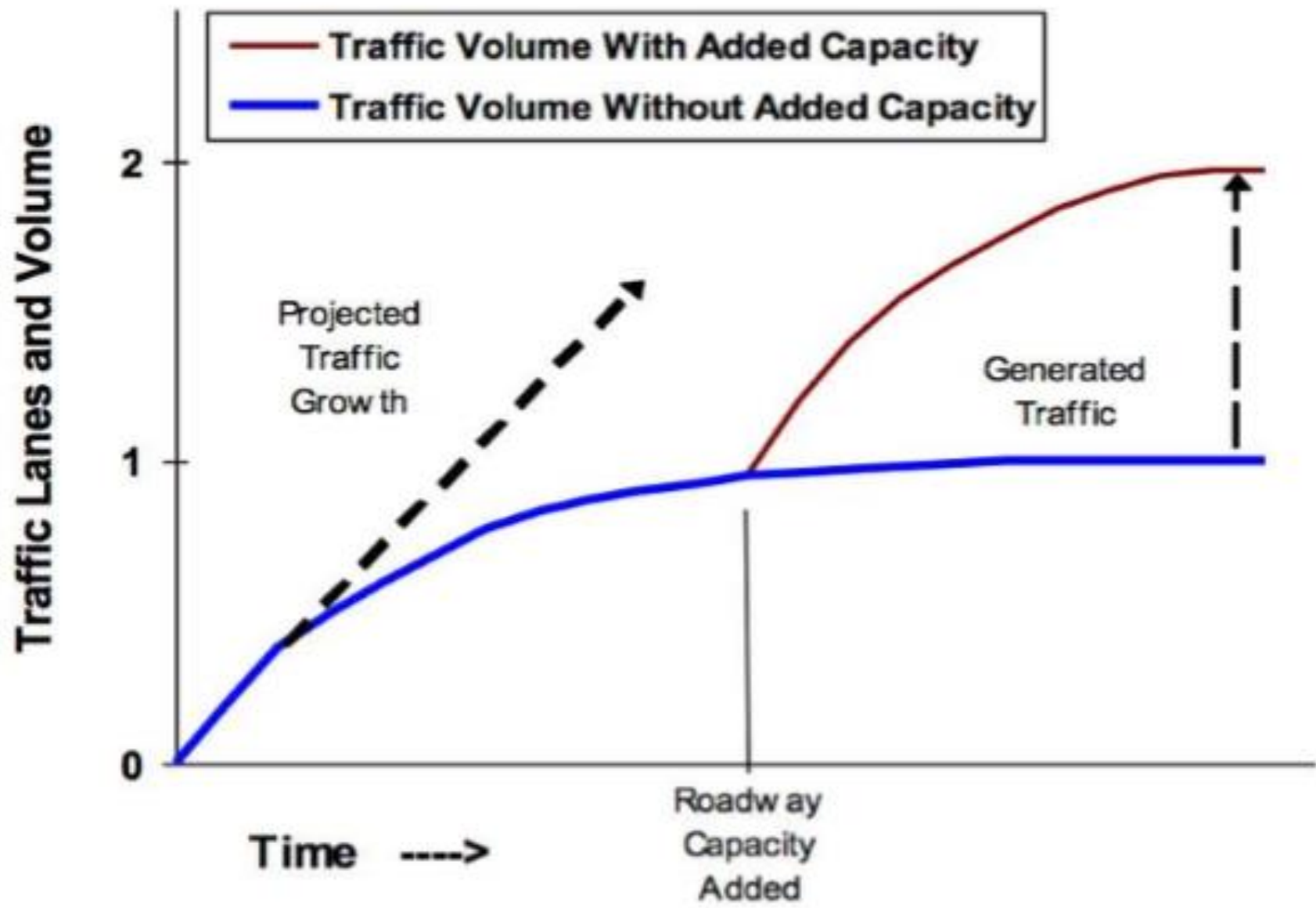
- MDX traffic study states LOS on existing 836 East of 137 Ave will degrade post build-out from C to D and trips *increase* from 49,000 to 108,000.
- MDX traffic study states trips on Kendall west of turnpike will *increase* post build-out
- Project will incentivize single vehicle commutes, which does not provide a viable long term solution to congestion, as a result of two phenomena:
  - **Induced Demand**
  - **Induced Development**

# Highways & Development

- **New policy language inadequate and will be overwhelmed by reality of the Parkway**



# How Road Capacity Expansion Generates Traffic



# **Project is inconsistent with Federal Policy**

- **Inconsistent with CERP**
- **Inconsistent with Section 404 of the Clean Water Act**
- **Requires a full EIS review under NEPA**
- **Requires more thorough review under the Endangered Species Act**

# Potential Alternatives Exist

- **Implement SMART Plan corridors**
- **Improve existing public transit**
- **Expand the network of current and planned public transit corridors**
- **Intra-Urban Development Boundary Corridor--connect to an existing road within the UDB**
- **Combination of the Above**

# **The State Should Deny This Proposed Amendment**

We urge the South Florida Regional Planning Council to take into consideration the many inconsistencies which this project displays with the state and federal goals of everglades restoration and endangered species protection, as well as the inconsistencies it displays with local policy and deny this proposed amendment.