



**SOUTH DADE**  
LOGISTICS & TECHNOLOGY DISTRICT  
BRING THE JOBS

## Supplementary Response to Comments



## **Introduction.**

This supplementary white paper is intended to address some of the issues raised by Miami-Dade County staff and third parties related to the pending South Dade Logistics & Technology District (“SDLTD”) Comprehensive Development Master Plan (“CDMP”) application.

The discussion below will respond to environmental and drainage issues and will provide additional detail on the issue of available industrial land supply in South Dade. As will be explained below:

- The SDLTD is not within the original boundaries of the Comprehensive Everglades Restoration Project (CERP) or Biscayne Bay Southeastern Everglades Ecological Restoration (BBSEER) Study.
- The U.S. Army Corps of Engineers is looking at options in the area in order to reduce harmful agricultural seasonal drawdowns which to date, have proven unfeasible.
- The SDLTD will not negatively impact adjacent agricultural land or uses.
- The SDLTD infrastructure will be hardened against storm impacts and sea level rise in a manner not otherwise required by code.
- Following development, the SDLTD land will not be subject to flooding from a Category 1 hurricane.
- The SDLTD stormwater improvements will significantly reduce pollutant runoff and improve aquifer recharge.
- The available South industrial land supply does not support significant development.

## **Environmental Concerns.**

As previously outlined by the Applicant and Co-Applicant, we believe that the SDLTD represents an opportunity to significantly reduce existing pollutant loads, improve area drainage, and reduce the need for seasonal drawdowns that serve existing agricultural uses. All of these changes will benefit the health of Biscayne Bay. Moreover, the development of the District will not create issues for abutting agricultural uses.

CERP and BBSEER Footprints and Consistency. The District’s land area is not, and never has been, part of any Comprehensive Everglades Restoration Project (CERP) component.

There has been recent suggestion that the SDLTD land is slotted to be part of the Biscayne Bay Southeastern Everglades Ecological Restoration (BBSEER) Study. BBSEER is a re-evaluation of several existing CERP components that since 1999 could not be built, either due to lack of funding or the original CERP objectives for the component could not be realized. The SDLTD is not part of any official component of the original CERP or the BBSEER study. Finally, the County's Initial Recommendation does not refer to this area as "being considered" for BBSEER -- because it is not.

The inclusion of the project area may have been proposed by one representative of the planning teams during brainstorming sessions, but has not been adopted as a BBSEER feature. Efforts to improve historic flows to Biscayne Bay by working with those lands east of the L31E canal and levee (the originally contemplated lands in CERP) can still proceed unaffected by and without the SDLTD lands.

Impacts on Adjacent Agricultural Land. On Page 7 of the Initial Recommendation, staff suggests that "additional information is needed on how the applicant will reduce the potential adverse impacts of the proposed development on the adjacent agricultural parcels, including the impact of lighting and drainage." As analyzed in the project's submitted materials, the SDLTD will be designed to retain 100% of the stormwater from the 100 year / 3-day storm (current code required design to a 25 year /3-day storm), which will necessarily reduce the use of the existing agricultural ditch system. Moreover, the existing drainage patterns of neighboring agricultural uses will not be impacted by the development. See Public Infrastructure Design Concepts South Dade Logistics and Technology District, August 17, 2021.

Environmental Assessment. On Page 8 of the Initial Recommendation, staff notes that the Applicant and Co-Applicant have agreed to substantial stormwater improvements. Staff raises the concern, however, that perhaps some of areas proposed for stormwater retention could be contaminated from past agricultural use. The SDLTD's consultant has completed both Phase I and Phase II environmental analyses of the first two Phases of the SDLTD. The soil and groundwater data obtained to date does not indicate widespread contamination from normal agricultural use at this site. See Public Infrastructure Design Concepts South Dade Logistics and Technology District, August 17, 2021. Additional reviews and analysis will be undertaken at the appropriate time in the development process

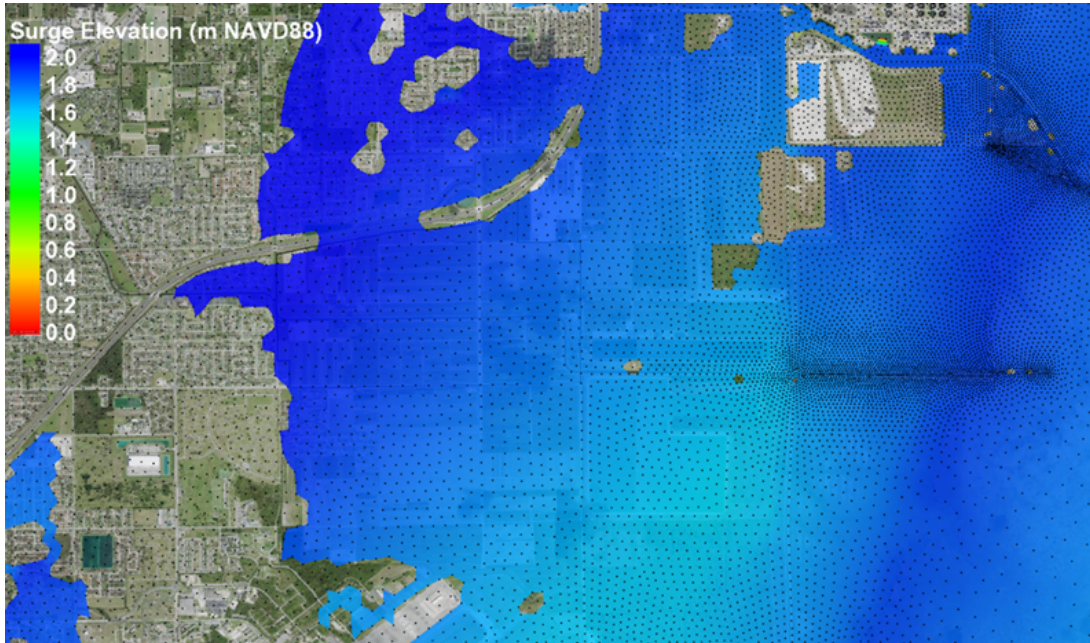
## **Hardening of Infrastructure, Sea Level Rise and the Coastal High Hazard Area.**

Hardening of Infrastructure. The Applicant and Co-Applicant have agreed to install all necessary infrastructure for the development. The infrastructure will be installed in a manner that will harden the SDLTD against current and future windstorms and flooding. The Applicant and Co-Applicant have proposed significant District-wide requirements to ensure that all infrastructure installed will be protected against sea level rise and help improve drainage capacity. Those agreed-to requirements are as follows:

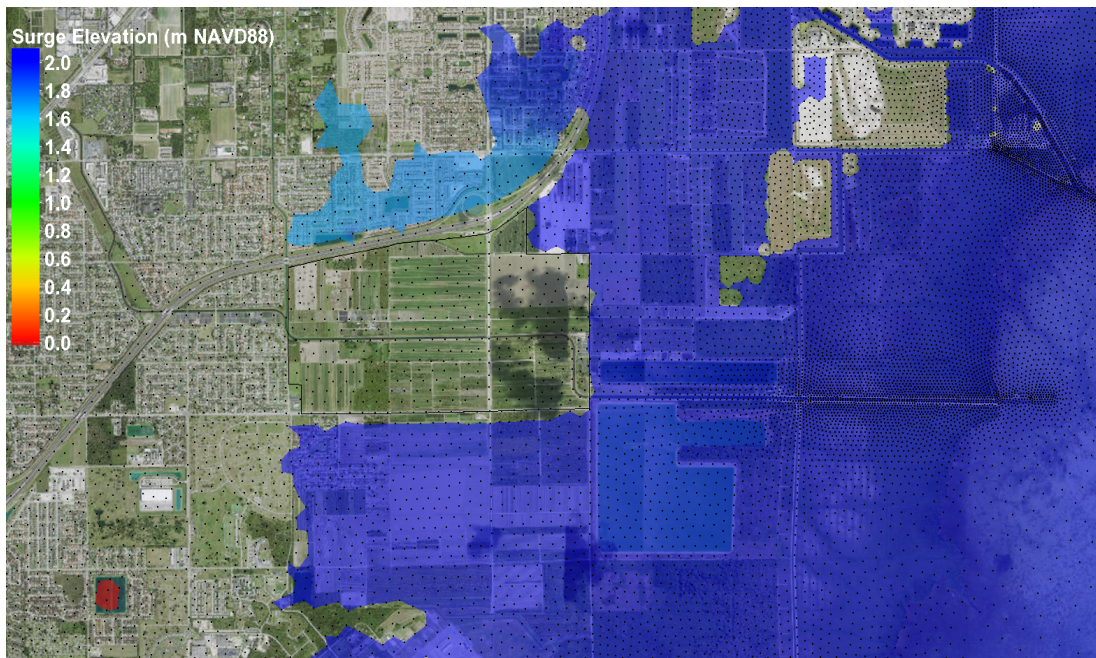
- The proposed minimum elevation of any new roadways shall be approximately 6.6 feet NGVD.
- All public collector and arterial roads within the District will provide drainage facilities designed to accommodate the 10-year design storm at the time of development of the relevant Phase or portion thereof.
- All development sites will include a perimeter berm set at the 100-year 3-day storm event (calculated at the time of development of the site) to retain the runoff from the development.
- Wet well rim elevations and all control panels for sewer infrastructure, shall be set at an elevation 1 foot or more above FEMA base flood elevation calculated at the time of development of the relevant Phase or portion thereof.

The Coastal High Hazard Area (the "CHHA"). As staff notes on Page 81 of the Initial Recommendation, "Section 163.3178(2)(f), Florida Statutes, requires the Coastal Management Element of the CDMP to contain development and redevelopment principles, strategies, and engineering solutions that reduce the flood risk in coastal areas which results from high-tide events, storm surge, flash floods, stormwater runoff, and the related impacts of sea-level rise." (emphasis added) The SDLTD is proposing an engineering solution – the District's land will be significantly raised in elevation. Following development, the SDLTD land will not be subject to flooding.

The Applicant and Co-Applicant retained AECOM, a leading engineering firm, to conduct a hydrodynamic modeling analysis to determine whether the proposed elevation improvements to the SDLTD would prevent coastal flood inundation of the site and not induce any adverse effects to adjacent areas. The full AECOM report has been submitted under different cover. Below are figures showing the impact of the proposed District on one of three modeled Category 1 storms. As you will note, the SDLTD development is shown to remove all potential inundation from the District and reduce the scope of inundation in the surrounding area. The same result occurred in all three modeled storms.



***FEMA Flood Inundation without SDLTD for Storm #234***



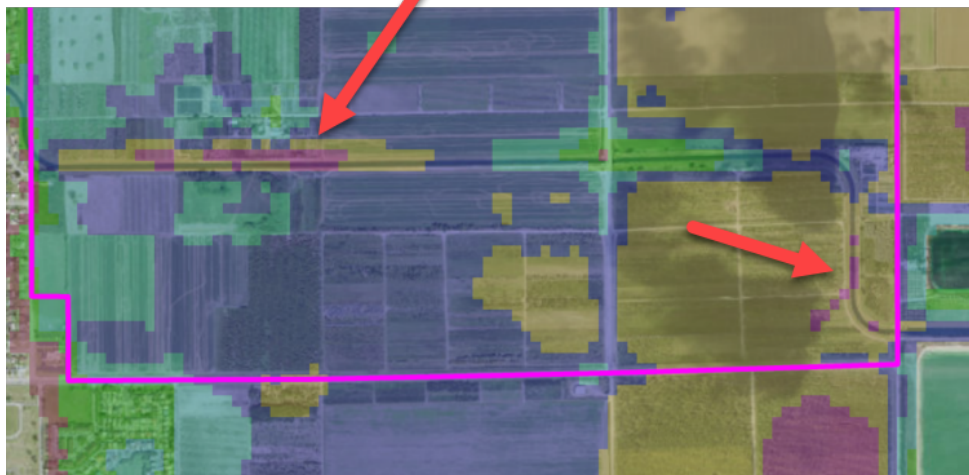
***Flood Inundation with SDLTD for Storm #234***

Despite the implication in the Initial Recommendation, the Applicant and Co-Applicant understand that raising the District does not exempt development from compliance with existing or future minimum finished floor requirements. The Applicant and Co-Applicant

also understand that the CHHA may be modified in the future. There is nothing unique about the SDLTD site that makes it more vulnerable to sea level rise than any other land in Miami-Dade County. Staff's implication that raising the site by significantly over current elevations would somehow not offer protection from storm surge is not supported by the data. If staff is concerned that sea level rise will result in the expansion of the CHHA in the future, it should support efforts, like the SDLTD's, to significantly increase the elevation of new development throughout the County.<sup>1</sup>

Staff also suggests, on Page 81 of the Initial Recommendation, that portions of the SDLTD are projected to be inundated at up to six (6) feet from the impacts of a Category 1 hurricane. That level of inundation occurs only within the actual C-102 canal. It is not unusual that the water in a canal would be raised significantly during a storm event but that has no bearing on the potential inundation of the SDLTD development.

The only areas with upto 6' of inundation are in the canal.



The SDLTD is Not Within the Southwest Biscayne Bay Wetlands Basin. On Page 43 of the Initial Recommendation, staff notes that the SDLTD is adjacent to and "within the Southwest Biscayne Bay Wetlands Basin." The latter assertion is not true. The SDLTD is not within the Basin, which is located east of SW 107 Avenue.

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<sup>1</sup> The Initial Recommendation references Hurricane Andrew as if South Dade is uniquely at risk of a major hurricane. A significant portion of Miami-Dade County is at direct risk of storm surge from a major storm – there is nothing unique about the SDLTD that makes it particularly vulnerable.



No Conservation Easements, Covenants, or Lakes. On Page 44 of the Initial Recommendations, staff suggests that portions of the SDLTD are under a conservation easement or covenant. To be clear, no such easements or covenants exist. There are similarly no lakes or lake littoral zones on the site.

Water Quality. The Initial Recommendation suggests that the SDLTD development is “likely to affect water quality” but that “without measuring and characterizing the existing water quality” it is not possible to “say with certainty” the nature of the impact. The SDLTD team has already completed and submitted this impact analysis. The result: a significant reduction in nutrient export.<sup>2</sup>

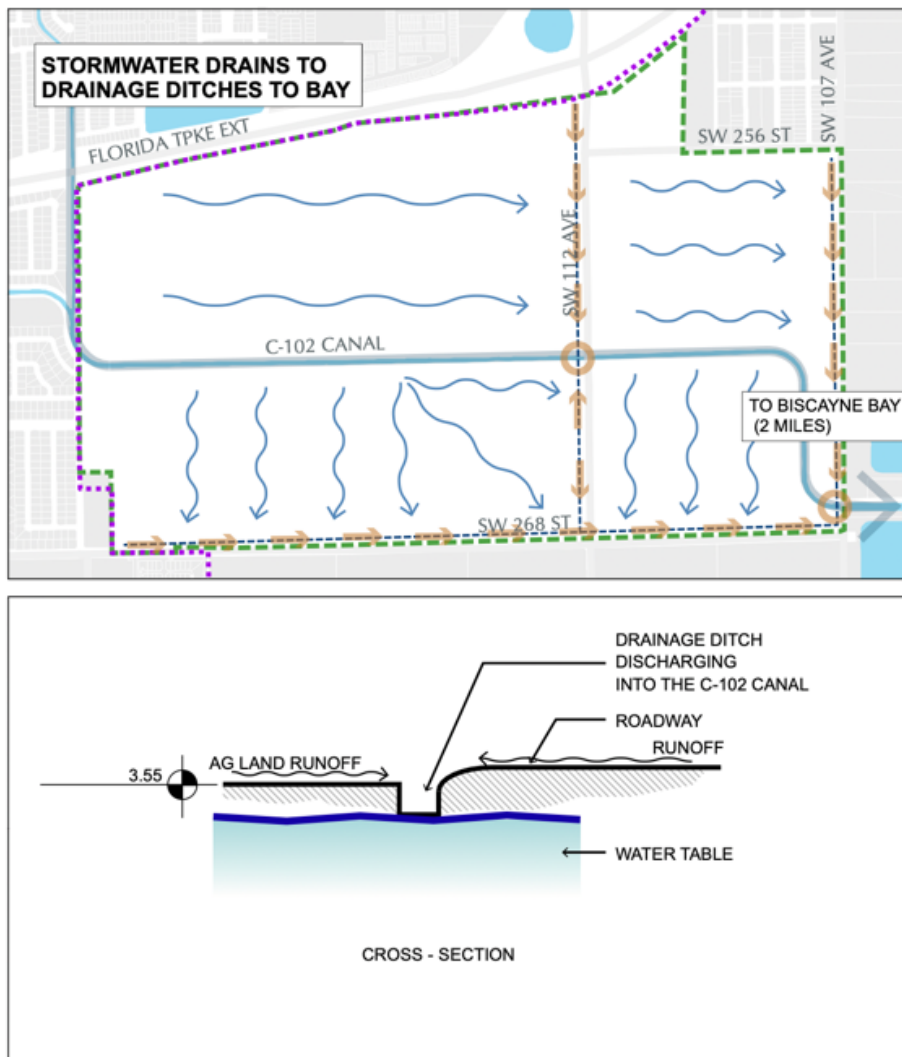
As fully explained in the submitted materials, the SDLTD development will significantly reduce the amount of phosphorus and nitrogen released into the environment – including that driven by the 757-acre feet of flow that annually flows into the C-102 canal from the site. While implying the SDLTD will negatively impact water quality, staff is also ignoring the impact of Section 18C of the County Code, which bans the use of any fertilizers containing nitrogen or phosphorus between May 15 and October 31 and otherwise places limits on the chemical composition of fertilizers. The restrictions of Section 18C apply to

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<sup>2</sup> While staff correctly notes that “sea level rise is affecting underground infrastructure such as wells and septic systems,” the Initial Recommendation fails to reflect that the SDLTD is proposing to remove any existing agricultural wells and is not proposing any new septic systems. In fact, the SDLTD development will prevent the installation of septic systems that could otherwise be serving the exurban sprawl permitted under the current CDMP designation.

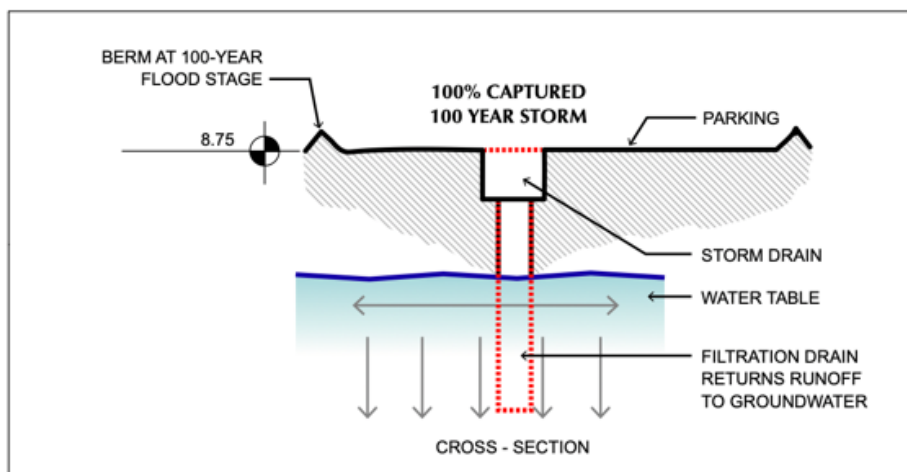
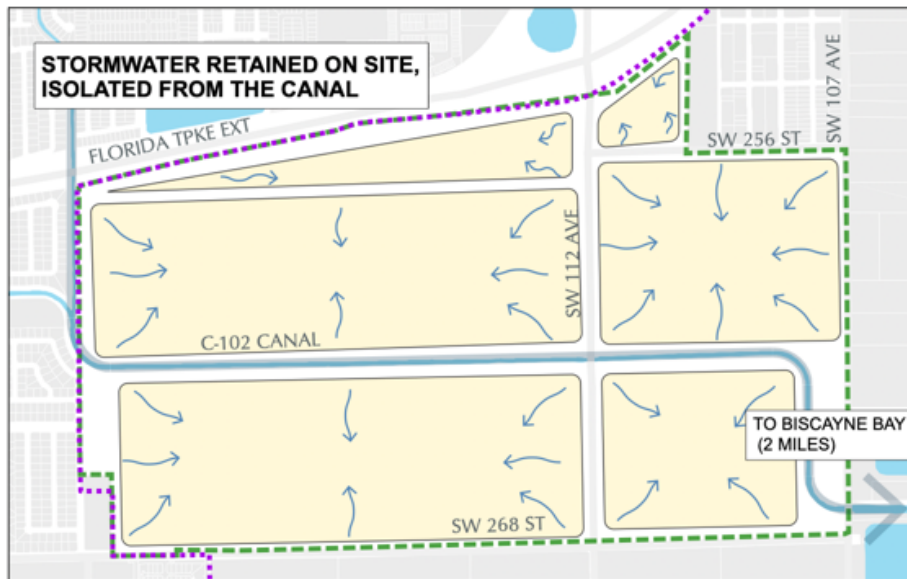
all urban land uses, including the SDLTD development, but expressly exempt agricultural uses.

The stormwater management system that will be put in place as part of the development will also help ensure that stormwater returns to the aquifer as opposed to largely running into the C-102 Canal (as it currently does). The existing and proposed conditions are depicted below.



**EXISTING CONDITIONS**





### IMPROVED CONDITIONS

The SDLTD Site Requires Annual Drainage. The Initial Recommendation suggests that the SDLTD is inconsistent with Policy CON-6D, which provides that “areas in Miami-Dade County having soils with good potential for agricultural use without additional drainage of wetlands shall be protected from urban encroachment.” (emphasis added) The issue with this conclusion is obvious: the SDLTD site requires damaging seasonal groundwater

drawdowns to remain farmable.<sup>3</sup> Otherwise, the current elevation of the site would not permit agricultural use at all. Accordingly, the SDLTD site is not among the areas of the County entitled to such protection.

### **South Dade Industrial Supply.**

The County has identified 174 individual properties as being available for industrial development within the UDB in South Dade. 115 of those sites are less than one acre. Only eighteen (18) are above ten (10) acres. As will be explained below, these sites have significant issues that make their development highly unlikely.

<b>Parcel Size</b>	<b>Number of Folios</b>	<b>Percentage of Total</b>
30 acres or more	4	2.3
20 acres to 30 acres	6	3.4
10 acres to 20 acres	8	4.6
5 acres to 10 acres	7	4.1
1 acre to 5 acres	34	19.5
Less than 1 acre	115	66.1
<b>Total</b>	<b>174</b>	<b>100.0</b>

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<sup>3</sup> Miami-Dade County, Sea Level Rise Impact on the Agricultural Community in Miami-Dade County (Sept. 2020), pg.12

## **Homestead Park of Commerce.**

There are currently 190 vacant acres within the Homestead Park of Commerce (“HPOC”), which was established over 25 years ago. Prior to the recent Copart transaction in October 2020, only seven parcels of land, consisting of 59 acres, had been developed within HPOC. Three of those parcels, consisting of a total of 19 acres, are owned by governmental entities including: 1) the Miami-Dade Public School District which operates a school on-site; 2) Miami-Dade Fire Rescue which operates a fire/rescue station; and 3) the City of Homestead which maintains a utility facility on its land. The four privately owned parcels consist of approximately 40 acres. Two of the four are occupied by structures that were constructed prior to 2009, which means that only two privately owned parcels consisting of a total of 16.9 acres were developed since 2009 even though the nation, as well as the South Florida region, experienced the longest period of economic expansion in history between 2009 and the onset of the current pandemic in 2020. Several factors have contributed to the historic lack of demand for land in HPOC, which are as follows:

- HPOC is not immediately accessible from any roadway that is part of the regional highway network and to points that provide access to the highway work involves time-consuming passage through residential communities and intersections that are controlled by traffic signals.
- Approximately 149 acres of the land shown within HPOC itself and an adjacent subdivision to its north (the Miami Land & Development Subdivision), which is frequently considered part of HPOC, are in Accident Protection Zone 2 (“APZ 2”) of the Homestead Air Reserve Base (“HARB”). The regulations relating to APZ 2 place limitations on the number of people that can be employed on those parcels, which reduces the number of potential users. All four of the existing privately developed parcels in HPOC are outside the APZ 2 zone.
- The 119 acres in the adjacent subdivision to the north are presently being used for agricultural activity including several parcels that are owned by a couple of the largest agri-businesses operating in the southern portion of Miami-Dade County. Further, the ownership pattern of the parcels within this subdivision makes land assembly for a non-agricultural use difficult to achieve. Land assembly is also an issue with respect to some of the parcels in the HPOC subdivision that are not in APZ-2.

As of April 2021, there were 190.2 vacant acres of land designated for industrial use in HPOC together with the land in the adjacent Miami Land & Development Subdivision and the Speedway Commerce Park Subdivision.

### **County “Gift” Parcels.**

The other large assemblage of potential industrial land in South Dade is owned by the County. After the closure of the original Homestead Air Force Base, the Federal government gave approximately 600 acres of land the County. The gift included 4 parcels of land, none of which had direct access to a major highway. The four parcels were as follows:

- Parcel 1, which was located on the east side of SW 12<sup>7</sup><sup>th</sup> Avenue north of SW 280<sup>th</sup> Street, consists of 247.46 acres. Currently, 212.73 acres are the site of the County’s Air Reserve Base Park. The remaining 34.73 acres are owned by the Miami-Dade County Public School District and is the site of the Mandarin Lakes K-8.
- Parcel 2, which is located directly across SW 127<sup>th</sup> Avenue from the Air Reserve Base Park, consist of 123.7 acres. It is currently the site of a FedEx facility, which occupies 32.28 acres, and Amazon is the process of building a facility on the remainder of the parcel.
- Parcel 3, which is located on the southwest quadrant of the intersection of SW 127<sup>th</sup> Avenue and SW 280<sup>th</sup> Street, consists of 29.7 acres. Currently, there are no plans to develop the property but its use for industrial use may be opposed by the people living in the residential units to its immediate west and across the street to the east.
- Parcel 4, which is located immediately north of the Homestead Air Reserve Base, consists of 204.37 acres. Portions of this parcel are already developed and the undeveloped portion is the site of a proposed steel mill, a project that has already been approved by the Board of County Commissioners.

Of the original 600 acres gifted by the Federal government, all but 29.7 acres is currently developed, under the process of being developed, or has already been approved for development by the County. The remaining land has no HEFT access and is immediately adjacent to residential development, making its use for industrial purposes unlikely.

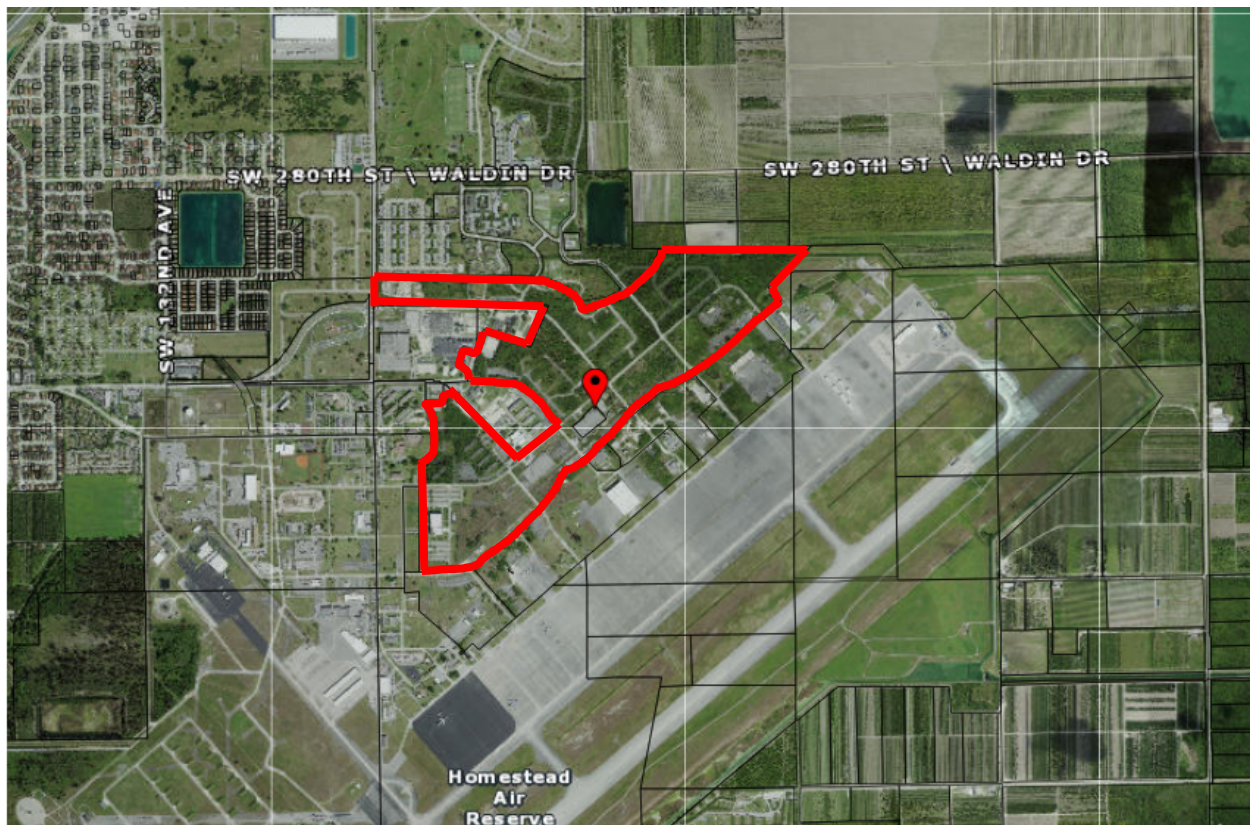
## **Issues with Larger Industrial Sites.**

Below is an analysis of the identified larger industrial properties in South Dade, including, but not limited to, sites in HPOC and within the “gift” parcels. As you will note, some of the listed sites are already under development and therefore not available. Others have development approvals that are moving forward. Others have significant issues that have prevented development and will continue to prevent development for the foreseeable future.

Folio(s): 30-7901-000-0120

Owner: MIAMI DADE COUNTY

Acreage: 105.26



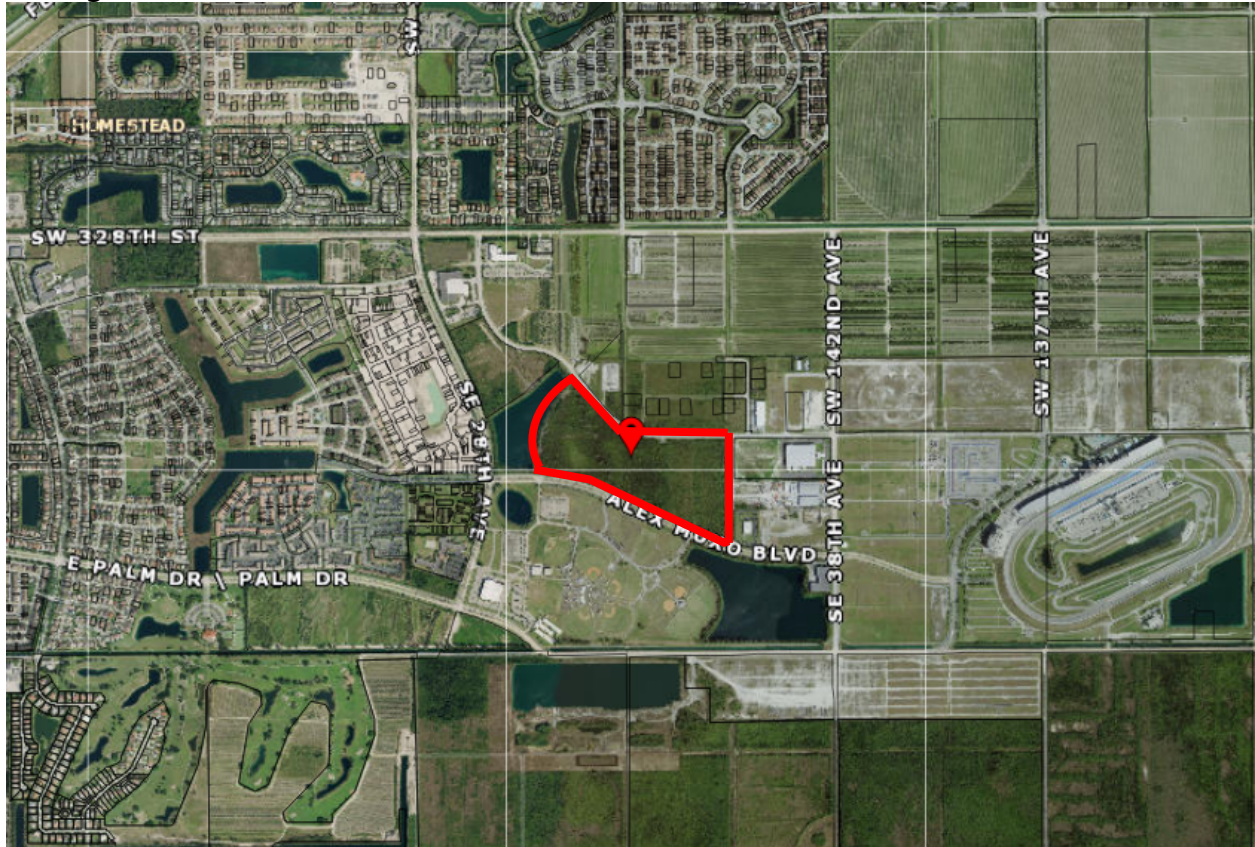
- Publicly owned land - – “Gift” parcel.
- Extremely irregular shape with no direct expressway access.
- Abutting Homestead Air Reserve Base.
- Ecosteel USA is proposing to develop a steel plant on this property that will use all the undeveloped land. The project has been approved by Miami-Dade and the current plan is to be operational in the fourth quarter of 2022.



Folio(s): 10-7921-011-0040

Owner: COPART OF CONNECTICUT INC

Acreage: 36.91

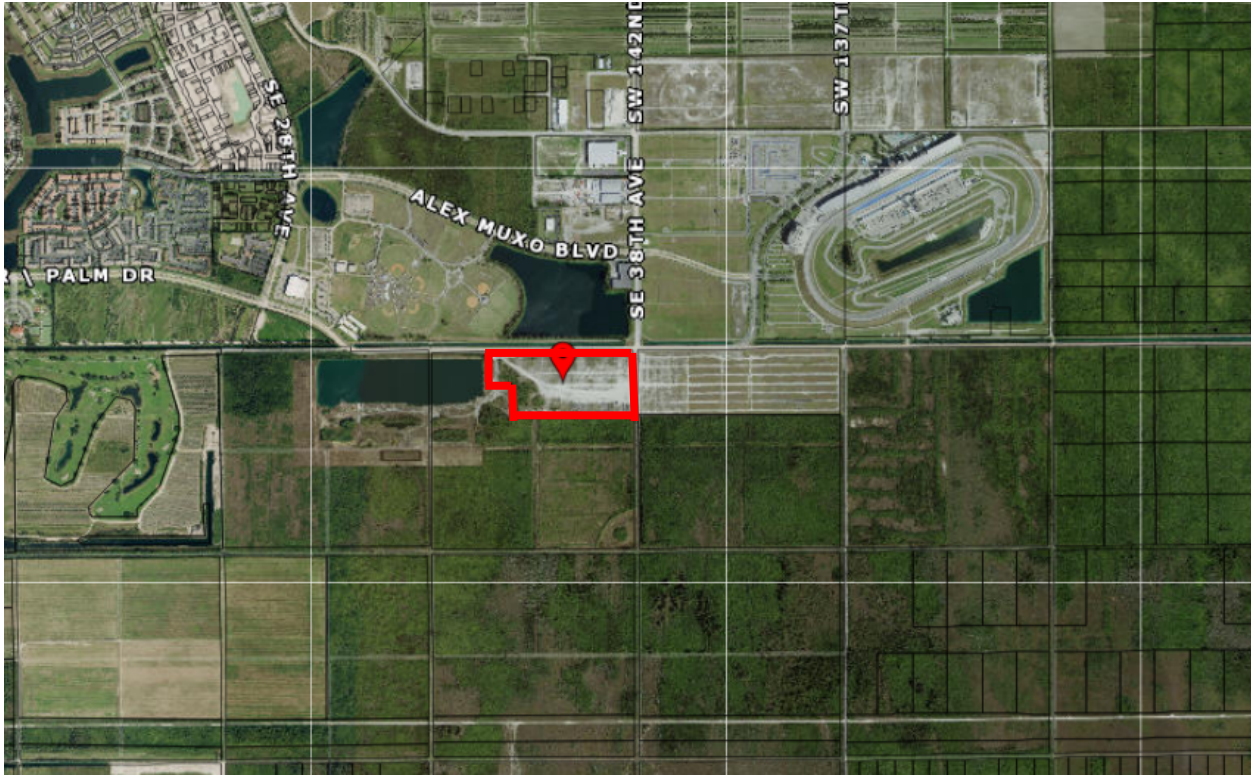


- Portion of a much larger development. Included in the analysis because it is the only non-jurisdictional wetlands portion.
- Within the Homestead Park of Commerce:
  - Not immediately accessible from any roadway that is part of the regional highway network.
  - Points that provide access to the highway work involves time-consuming passage through residential communities and intersections that are controlled by traffic signals.
- Homestead has approved proposed use for car storage. Permits have been issued and construction is underway.
- No direct expressway access.

Folio(s): 10-7927-001-0065

Owner: HOMESTEAD 145 BLDG 1 LLC

Acreage: 34.14



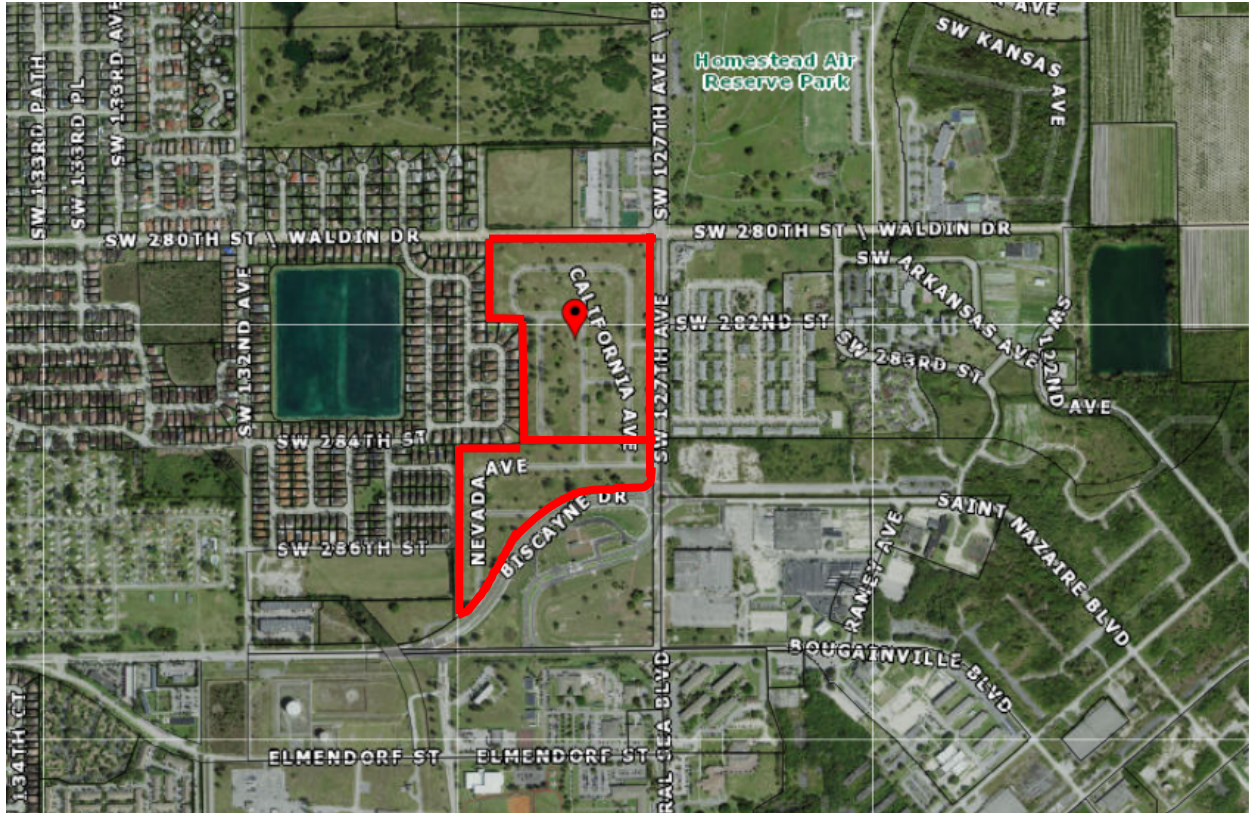
- Incorporated lands, but outside of the Homestead Park of Commerce.
- Currently under construction for a 145,000 square feet warehouse to be occupied by Amazon in 2022.



Folio(s): 30-7902-000-0040 and 30-7902-000-0021

Owner: MIAMI DADE COUNTY

Acreage: 29.53 and 16.76

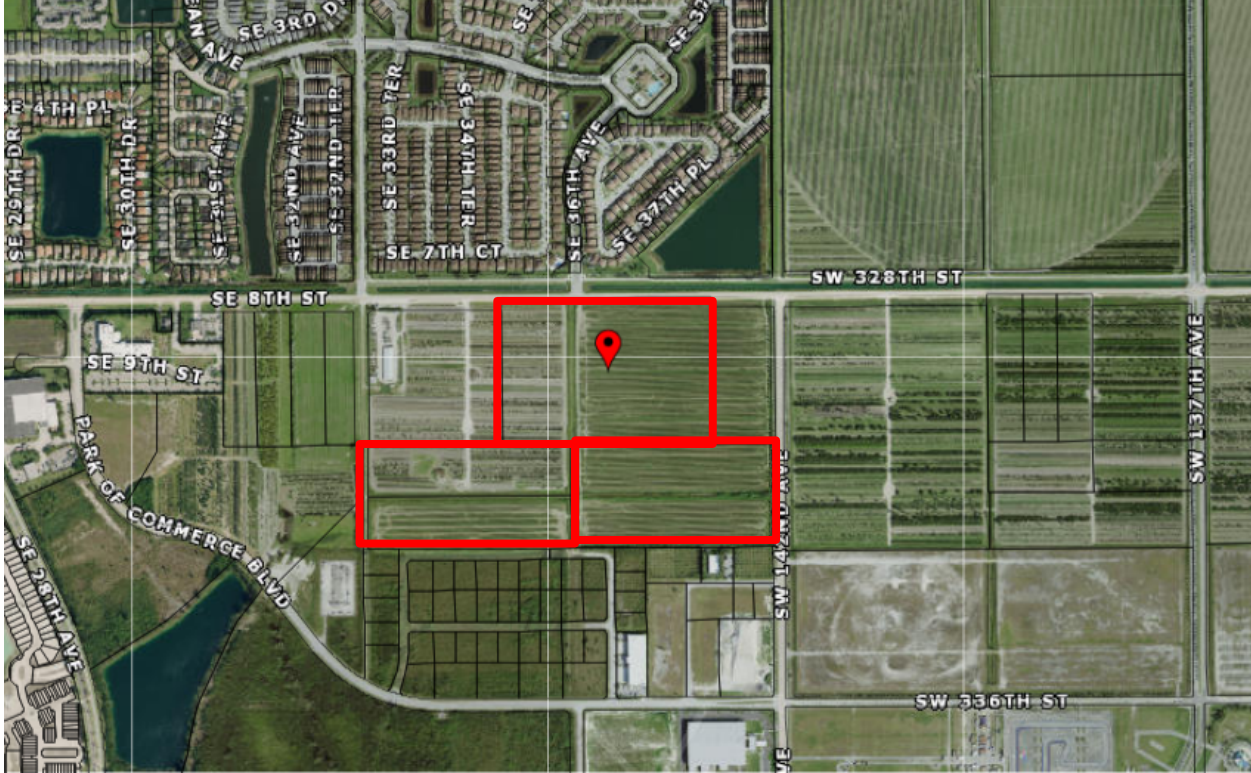


- Publicly owned land – “Gift” parcel.
- Irregular shape.
- Difficult to gain approval for development with industrial uses because the site immediately abuts existing residential uses.
- No direct expressway access.

Folio(s): 10-7922-0010-110, 10-7922-001-0160, 10-7922-001-0140

Owner: JAENSCH INC

Acreage: 59.14



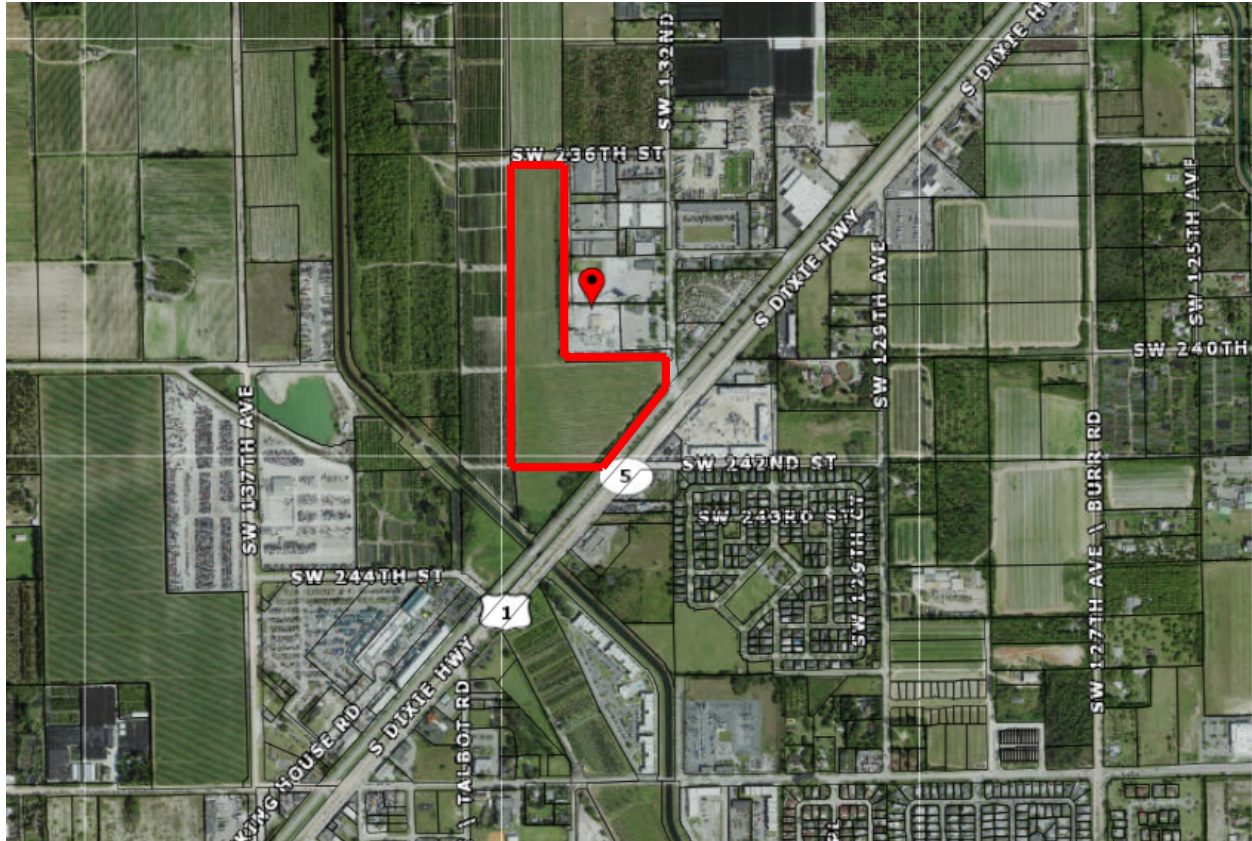
- Difficult to gain approval for development with industrial uses because the site fronts existing residential uses.
- Incorporated lands, but outside of the Homestead Park of Commerce.
- No access to major roadways .
- Within an Accident Potential Zone 2, which limits the number of people who can be employed.



Folio(s): 30-6923-000-0530

Owner: COPART OF CONNECTICUT INC

Acreage: 23.22

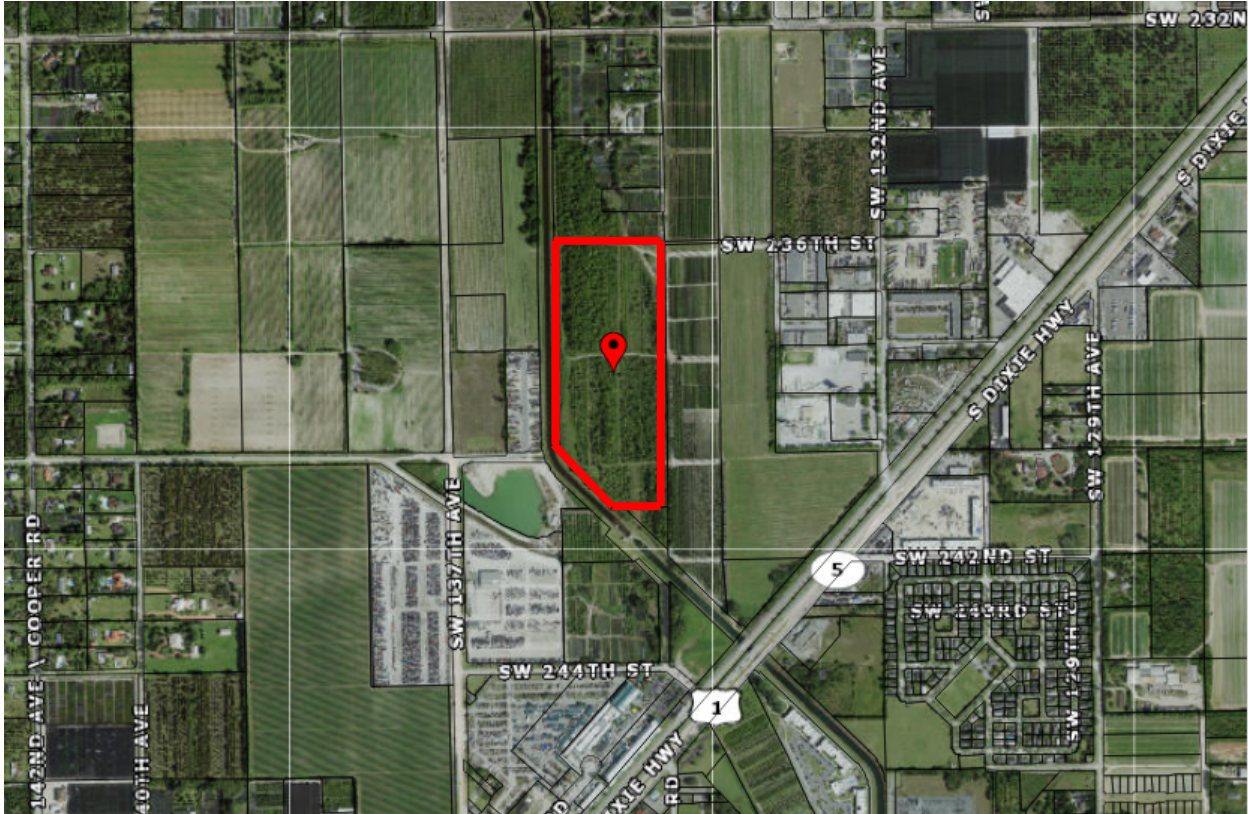


- No direct expressway access.
- Proposed use for car storage.
- Platting and Zoning applications in process.

Folio(s): 30-6923-000-0532

Owner: COPART OF CONNECTICUT INC

Acreage: 14.36

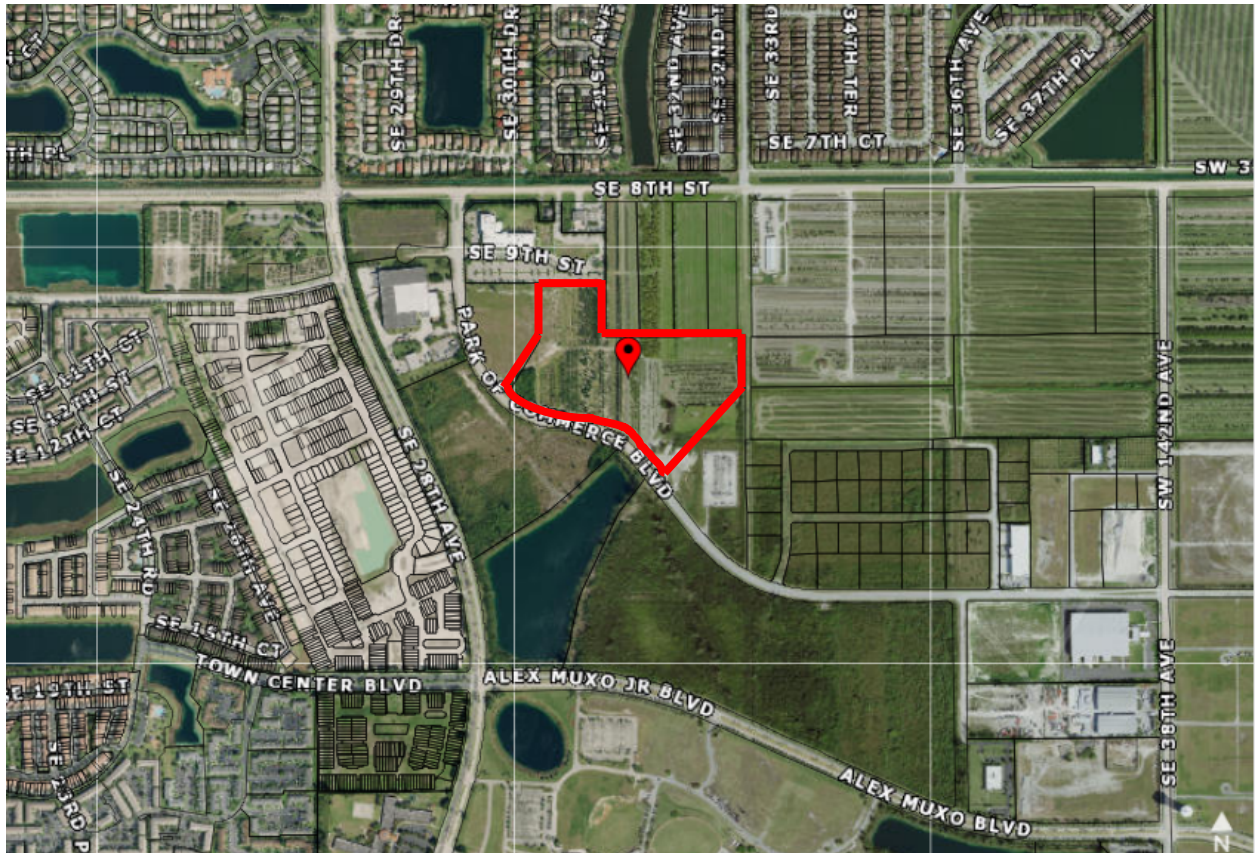


- Landlocked between Florida Power & Light on the east and the canal on the west.
- Irregular shape site.
- No direct expressway access.
- Proposed use for car storage.
- Platting and Zoning applications in process.

Folio(s): 10-7921-011-0025

Owner: DOUG LLC

Acreage: 22.78

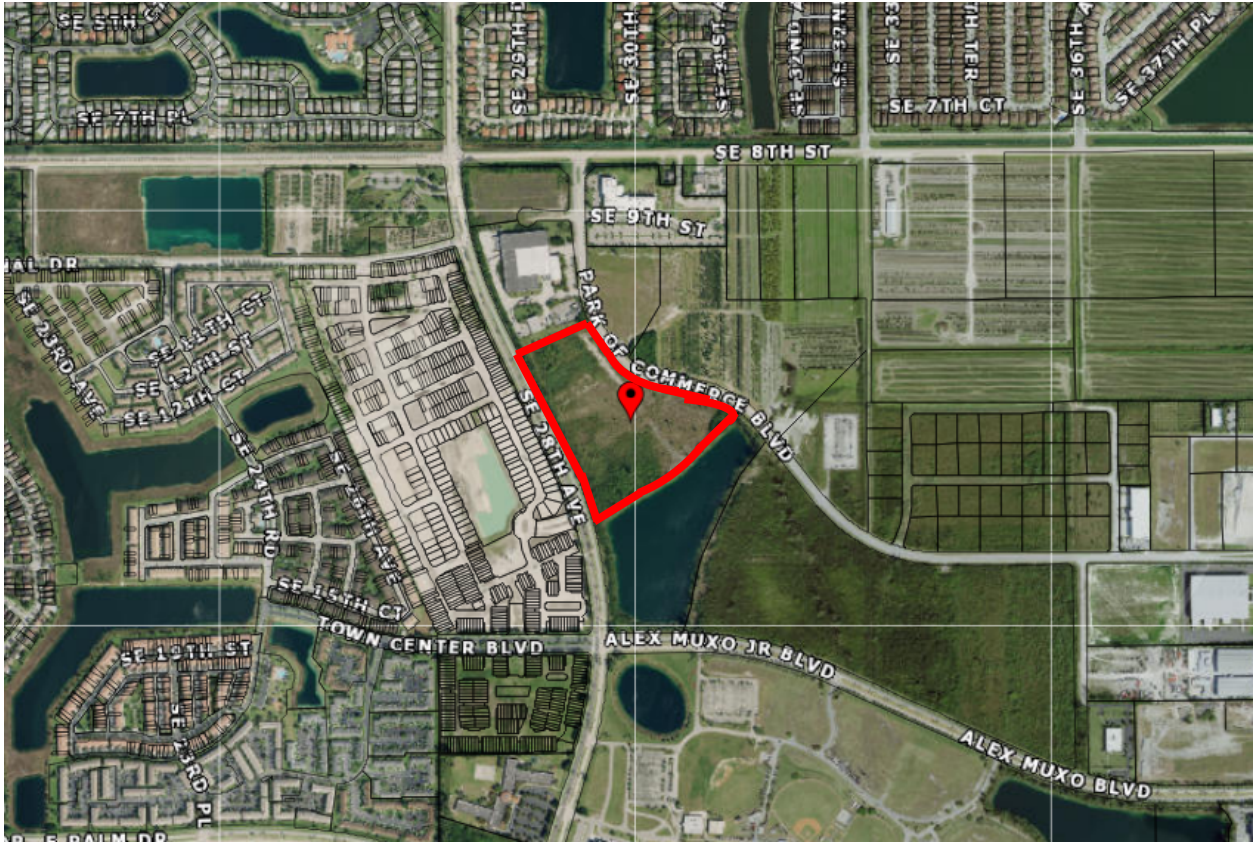


- Extreme irregular shape.
- Within an Accident Potential Zone, which limits the number of people who can be employed.
- Within the Homestead Park of Commerce:
  - Not immediately accessible from any roadway that is part of the regional highway network.
  - Points that provide access to the highway work involves time-consuming passage through residential communities and intersections that are controlled by traffic signals.

Folio(s): 10-7921-011-0060

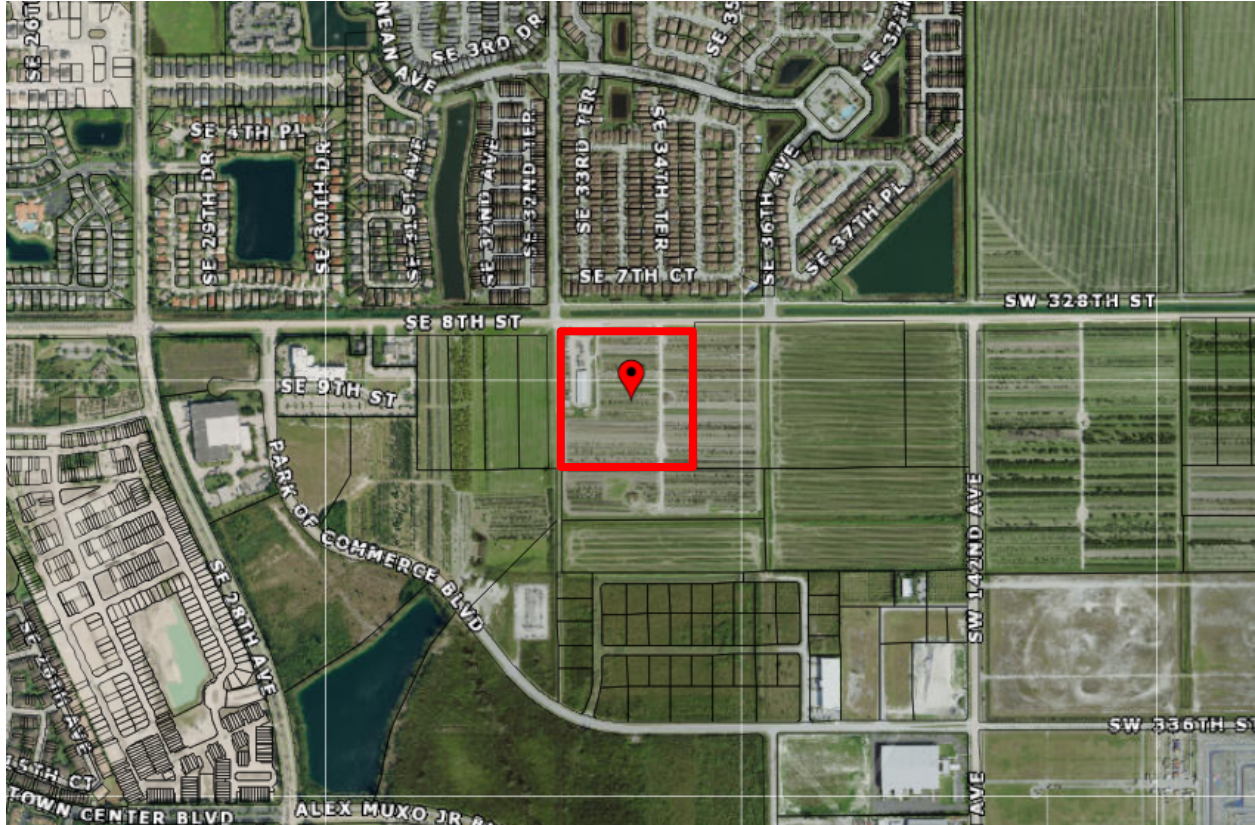
Owner: DOUG LLC

Acreage: 18.91



- Irregular shape.
- No assemblage opportunity.
- Within the Homestead Park of Commerce:
  - Not immediately accessible from any roadway that is part of the regional highway network.
  - Points that provide access to the highway work involves time-consuming passage through residential communities and intersections that are controlled by traffic signals.

Folio(s): 10-7922-001-0120  
Owner: JOHN L ALGER TRS  
Acreage: 17.14



- Difficult to gain approval for development with industrial uses because the site fronts existing residential uses.
- No direct expressway access.
- Within an Accident Potential Zones, which limits the number of people who can be employed.



Folio(s): 10-7921-011-0080

Owner: BAER ENTERPRISES LLC

Acreage: 11.52

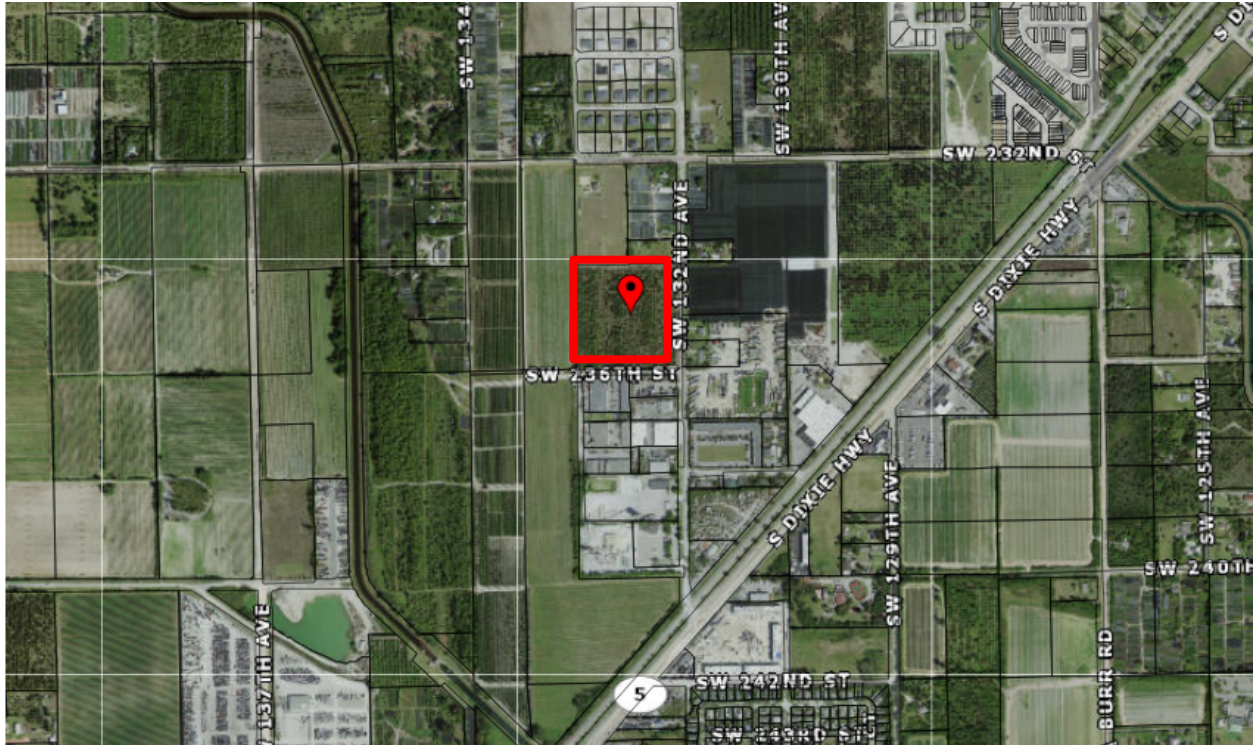


- No assemblage opportunity.
- Within Accident Potential Zone 2, which limits the number of people who can be employed.
- Within the Homestead Park of Commerce:
  - Not immediately accessible from any roadway that is part of the regional highway network.
  - Points that provide access to the highway work involves time-consuming passage through residential communities and intersections that are controlled by traffic signals.

Folio(s): 30-6923-000-0400

Owner: LALI II INC

Acreage: 10.34



- Only slightly over 10 acres in size.
- No direct expressway access.
- Current zoning application pending for warehouse use.

**Conclusion.**

With 87% of the urban land south of SW 8 Street developed with single-family houses, the growing population of South Dade continues to suffer higher unemployment and tiresome commutes. The SDLTD will help repair an imbalance that has located the vast bulk of the County’s industrial and logistics land in the County’s Northern and North-Central Tiers, while reducing environmental impacts.