



MEMORANDUM

FINAL ADOPTED
AGENDA ITEM #III.D

DATE: AUGUST 27, 2025

TO: COUNCIL MEMBERS

FROM: STAFF

SUBJECT: REGIONAL ISSUES: COMPREHENSIVE PLAN AMENDMENT REVIEW
MIAMI-DADE COUNTY 25-03ESR (CDMP 20230013)

Pursuant to the Interlocal Agreement creating the South Florida Regional Planning Council (Council) in 1974, the Council is directed by its member counties to “assure the orderly, economic, and balanced growth and development of the Region, consistent with the protection of natural resources and environment of the Region and to protect the health, safety, welfare and quality of life of the residents of the Region.”

Strategic Regional Policy Plan for South Florida (SRPP)

The Strategic Regional Policy Plan for South Florida (SRPP) was adopted by the Council on June 7, 2004. The SRPP centers around a set of 22 regional goals that address key, long-term challenges. Florida Statute (Section 186.507) specifically mandates that an SRPP must include regional goals and policies addressing the following areas, which are all included in the SRPP for South Florida:

- Affordable Housing
- Economic Development
- Emergency Preparedness
- Natural Resources of Regional Significance
- Regional Transportation

In the amendment review process, the Council recognizes the necessity of balancing competing policy goals such as economic development and environmental protection priorities.



Amendment Review

The Council reviews Comprehensive Plan amendments for consistency with the SRPP, Pursuant to Section 163.3184, Florida Statutes. Council review of amendments to local government comprehensive plans is limited to 1) adverse effects on regional resources and facilities identified in the Strategic Regional Policy Plan for South Florida (SRPP) and 2) extra-jurisdictional impacts that would be inconsistent with the comprehensive plan of any affected local government within the Region. The Council's review of amendments is conducted in two stages: (1) proposed or transmittal and (2) adoption. Council staff reviews the contents of the amendment package once the Department of Economic Opportunity certifies its completeness. A written report containing an evaluation of these impacts, pursuant to Section 163.3184, Florida Statutes, is to be provided to the local government and the State Land Planning Agency within 30 calendar days of receipt of the amendment.

Recommendation

Based on comments from the Florida Department of Transportation and lack of comment from the South Florida Water Management District, with no comments received from any other commenting agency or outside organization, find the proposed plan amendment as not causing adverse impact to state or regional resources/facilities and without extra-jurisdictional impacts that would be inconsistent with the comprehensive plan of any affected local government within the Region.

Find the Amendment generally consistent and approve this report for transmittal to Miami-Dade County and the State Land Planning Agency with the following Council Recommendations:

- To ensure that existing industrial land within the UDB is utilized to its highest and best use, and to minimize future development pressure outside of the UDB, the Council recommends aligning initiatives such as private/public partnerships for land assembly and brownfield redevelopment with broader economic development strategies. This approach will help balance economic growth with community and environmental priorities.
- To mitigate potential runoff, water quality, and freshwater recharge impacts, staff recommends that the Applicant consider sufficiently buffering the property from the C-4 Inflow canal on the western border, preserve existing intact wetlands, and restore wetlands as feasible. The Applicant and County should continue to work together to address and minimize potential adverse impacts to Wetlands of Regional Significance identified by Miami-Dade County.
- The Applicant should also ensure that there are no adverse impacts to the habitat of federal or state-designated endangered and threatened species. It is notable and commendable that an island hammock is identified for conservation with the support of the Miccosukee Tribe.
- The Applicant should work with Miami-Dade County to address impacts to NW/SW 137 Avenue to ensure that necessary infrastructure is either available or provided.
- The Applicant should ensure that potential connections to regional transit are maximized to the extent possible, as recommended by Miami-Dade Transportation and Public Works (MDTPW). The Applicant should coordinate with Miami-Dade County to complete nearby bicycle and pedestrian infrastructure, including crosswalks.

Proposed Amendment Summary

Kelly Tractor Company requests to amend the Miami-Dade Comprehensive Development Master Plan (CDMP) to develop a new headquarters on a ±246.07-acre site currently designated as “Open Space”. The application area lies mostly outside of the Urban Development Boundary (UDB) (± 244.37 acres) with ±1.70 acres inside the UDB. A portion of the parcel is within the Urban Expansion Area (UEA) (± 87 acres). The UEA designates areas suitable for Miami-Dade’s 2040 long-term planning horizon.

The amendment includes changes to the (CDMP) to (1) amend “Open Land” land use category text for Subarea 3 of the Land Use Element to create the “MIA Equipment and Supportive Services Area”, (2) add the proffered Declaration of Restrictions in the Restrictions Table in Appendix A of the CDMP Land Use Element, if accepted by the Board, and (3) amend the CDMP Capital Improvements Element, Table 10A Projects with Developer Responsibility to Construct or Cause to Construct to include developer funded roadway project.

Council Staff Analysis

The Council notes that the South Florida Water Management District (SFWMD) and Florida Department of Transportation (FDOT) District Six reviewed the proposed amendment pursuant to Section 163.3184(3), Florida Statutes (F.S.), in their roles as reviewing agencies as identified in Section 163.3184(1)(c), F.S. FDOT District 6 review the amendment package per Chapter 163 Florida Statutes and found “... the proposed amendment would **not** adversely impact transportation resources and facilities of state importance.” Likewise, the SFWMD reviewed the amendment and “... provides no comments pursuant to Section 163.3184, Florida Statutes (F.S.).” No comments were received from any other commenting agency or outside organization. The Council additionally met with staff from Miami-Dade County Regulatory and Economic Resources (RER) and separately met with the Applicant to review specific issues relevant to the Council’s purview.

In its Application Summary No. CDMP20230013, Miami-Dade County RER noted that Miami-Dade County Department of Environmental Resources (DERM) indicated that the subject site is within Wetlands of Regional Significance as described in the Land Use Element of the Miami-Dade Comprehensive Development Master Plan (CDMP). The subject site is also included in a larger area identified in Maps showing Natural Resources of Regional Significance in the SRPP, as containing wetlands of regional significance.

Regarding transportation, no significant adverse impacts were identified to the Strategic Intermodal System (SIS) by the Florida Department of Transportation (FDOT District 6). Even so, impacts to the local transportation network are anticipated, potentially affecting regional mobility.

There are potential positive economic development outcomes that this Amendment could catalyze if adopted. The project has the potential to contribute to the economic vitality of the region by creating jobs and growing key industry sectors.

This Proposed Amendment was transmitted with a 10 (aye) 2 (nay) 1 (absent) vote from the Miami-Dade Board of County Commissioners on July 17, 2025, with a Staff recommendation to Transmit the proposed standard amendment to the Comprehensive Development Master Plan (CDMP) Adopted 2030 and 2040 Land Use Plan (LUP) map.

APPLICATION AREA

MUNICIPAL BOUNDARY

2030 URBAN DEVELOPMENT BOUNDARY

URBAN EXPANSION AREA BOUNDARY

Source: Department of Regulatory and Economic Resources
June 2025

0 0.5
Miles

Economic Development

Industrial Land

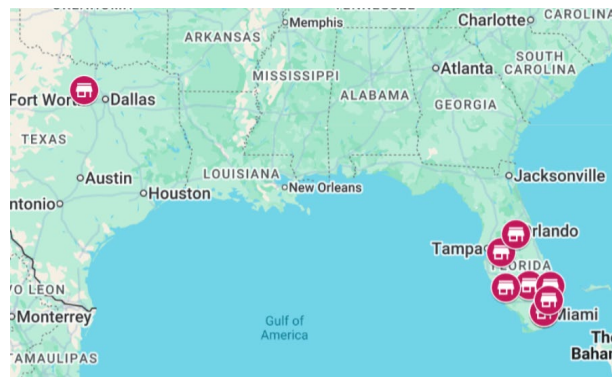
Kelly Tractor is the leading supplier of heavy equipment, trucks, and specialized equipment, serving Miami-Dade County since 1933. The Applicant has indicated that Kelly Tractor has outgrown its existing facility, which has resulted in operational inefficiencies, an inability to meet client demands, and lost opportunities. The Applicant has taken the position that there is not sufficient industrial land within the UDB to support Kelly Tractor's needs, which is a key point in the argument to develop outside the UDB. Council staff recognizes the challenge in identifying assembled land within the UDB that is available to develop at the scale needed by Kelly Tractor.

Employment

If the proposed amendment and associated project proceeds, the Applicant projects its workforce to increase from its present level of approximately 400 employees to between 800 and 1,000 employees within a five-year period, with additional expansion anticipated thereafter.

Industry Sector Growth

The Applicant's Miami facility serves as the central hub for equipment distribution across Miami-Dade County and to branch locations statewide, with additional expansion planned in Fort Pierce and Florida City. It also fulfills international orders through the Port of Miami, Port Everglades, and Miami International Airport. Given these extensive operations, proximity to the regional highway network is critical to the Applicant.



The proposed site is unique, as this is the only available land in the County served by Florida's Turnpike, State Road 826, and State Road 836, with direct access provided at the western terminus of the SR 836 extension.

Limestone Mining

Kelly Tractor is integral to Miami-Dade County's limestone mining industry, which the Applicant indicates supports more than 14,000 jobs. The proposed project would provide critical functions, such as equipment repair, diagnostics, and specialized machinery, to sustain operations in the Lake Belt Area quarries. The Florida Legislature has recognized that a reliable aggregate supply is essential to the state's construction industry, transportation infrastructure, and public welfare.

Natural Resources of Regional Significance

The subject site is identified in the SRPP Natural Resources of Regional Significance Maps as containing wetlands of regional significance. The application area also lies within Wetlands of Regional Significance per the Land Use Element of the Miami-Dade Comprehensive Development Master Plan and may contain federal or state-designated endangered and threatened species.

The proposed application site lies within the core foraging range of the federally threatened wood stork (*Mycteria americana*) and is situated just east of several long-established rookeries for this species. It is

also located within the U.S. Fish and Wildlife Service's consultation zones for the endangered Everglades snail kite (*Rostrhamus sociabilis*) and the Florida bonneted bat (*Eumops floridanus*), both of which may use the site for nesting, roosting, or foraging. The local population of the Florida bonneted bat is known to forage and interact in open, dark areas near natural features such as wetlands, forests, open water, and areas with dense tree cover.

The site lies just east of the Florida Panther Focus Area, identified by the U.S. Fish and Wildlife Service as critical for the survival of the federally endangered Florida panther (*Puma concolor coryi*). While panthers are not migratory, they do disperse to establish new home ranges. Male panthers typically travel up to 25 miles, with some dispersing as far as 139.3 miles, while females tend to settle closer to their birthplace. This dispersal is vital for the species' reproduction, population growth, and expansion of its territory.

Seasonally flooded lands are known to support a wide variety of wildlife during the wet season. These include mammals, reptiles, amphibians, and numerous bird species. Several of the bird species that use this type of habitat are state or federally protected, such as wood stork (federally threatened), little blue heron, reddish egret, roseate spoonbill, and tricolored heron (all state threatened). Shorebirds, also present, are protected under the Migratory Bird Treaty Act. The Everglade snail kite, a federally endangered species, is also known to nest in nearby areas of Everglades National Park.

Regional Transportation

FDOT District 6 reviewed the amendment package and found the proposed amendment would not adversely impact transportation resources and facilities of state importance. The subject site is west of SR 836, which is a Strategic Intermodal System (SIS) facility, at the NW 137 Avenue interchange.

On the issue of local roads, the application proposes access to the development site via construction of the two northern lanes of NW 6 Street, from NW 137 Avenue to the planned NW 139 Avenue. This road segment is classified as a 'Major Roadway' (three or more lanes) on the CDMP's Adopted 2030 and 2040 Land Use Plan map. The Applicant has submitted a Declaration of Restrictions (covenant), which includes a commitment to provide access from NW 137 Avenue to the site using NW 6 Street, and seeks to amend the CDMP to add this road improvement to the Capital Improvements Element (CIE).

However, the proposed development is expected to significantly impact NW/SW 137 Avenue (north of SW 8 Street), another designated Miami-Dade County Major Roadway, and the application does not address these impacts. Additionally, the segment of NW/SW 137 Avenue from NW 6 Street to SW 8 Street is projected to fall below its adopted standard of service (LOS).

Miami-Dade Transportation and Public Works (MDTPW) reviewed the application and its potential impact on area transit services based on the development impact table and the Applicant's traffic analysis. The development impact table projects an increase of 1,000 employees but no additional residents, which does not reach the 10,000 persons-per-square-mile threshold required to trigger additional transit services under the Level of Service standards. The project is expected to generate 3,561 new daily vehicle trips. Based on an estimated transit usage rate of 1–3%, analysis would result in approximately 70 to 110 daily transit trips. However, because the site is located outside the UDB, it is not eligible to receive county transit service.

Council Recommendations

- To ensure that existing industrial land within the UDB is utilized to its highest and best use, and to minimize future development pressure outside of the UDB, the Council recommends aligning initiatives such as private/public partnerships for land assembly and brownfield redevelopment with broader economic development strategies. This approach will help balance economic growth with community and environmental priorities.
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Relevant SRPP Goals

SRPP GOAL 7 Protect, conserve, and enhance the Region's water resources.

SRPP GOAL 8 Enhance the Region's mobility, efficiency, safety, quality of life, and economic health through improvements to road, port, and public transportation infrastructure.

SRPP GOAL 14 Preserve, protect, and restore Natural Resources of Regional Significance.

SRPP GOAL 17 Maintain a competitive, diversified, and sustainable regional economy.

SRPP GOAL 20 Achieve long-term efficient and sustainable development patterns that protect natural resources and connect diverse housing, transportation, education, and employment opportunities.

Council Action (Executive Committee)

Council approved recommendations unanimously, 6 (aye) 0 (nay), on August 27, 2025.

Councilmember Michelle Lincoln, Chair
Councilmember René García, First Vice Chair
Councilmember Cary Goldberg, Second Vice Chair
Councilmember Frank Caplan, Secretary
Councilmember Denise Horland, Treasurer
Councilmember Steve Geller, Immediate Past Chair