

40. AGRICULTURE

ADA Form Part 2 (Consistency with Comprehensive Plans), Section D states: "Describe how the proposed development shall meet goals and policies contained in the State Comprehensive Plan (Chapter 187, F.S.), including, but not limited to, the goals addressing the following issues: housing, water resources, natural systems and recreational lands, land use, public facilities, transportation, and agriculture. [Emphasis added]"

The policies of the County's Comprehensive Development Master Plan (CDMP) have long supported agriculture as a viable economic use of suitable lands. Due to the importance of the agricultural industry to Miami-Dade County, the Applicant shall analyze, using "Evaluation of Agricultural Land Use Trends and Outlook in Miami-Dade County, Florida" (October 2023), whether its proposed development program shall adversely impact agricultural lands and production.

Miami-Dade County's agricultural industry and profitability over the past several decades has undergone a tectonic shift from row crops which now compete with Mexico and other trade partners towards nursery and floriculture operations which continue to be protected from foreign competition given USDA restrictions on importation of soil.

In the latest U.S. Census of Agriculture (2022), nursery and floriculture sales represented more than 83% of the county's agricultural revenue while utilizing just 19% of its farmland. By contrast, traditional row crops and other farm activity consume 83% of agricultural acreage yet account for only 19% of sales. This pronounced imbalance highlights the superior economic efficiency and viability of high-value nursery production, the challenges row crops face without federal protection on imports, and the fact that the County's 2022 agricultural study and plan indicates that foreign competition "*pose a dire threat*"¹ to fruit and vegetable crops and for the key fruits and vegetables historically grown in the County "*minimal profits challenge growers to remain in the industry.*"²

City Park is being developed on farmland which has been leased to farmers who exclusively grow row crops.³ It has never been used for nursery or floriculture growth. As a result, when proposing a 1,000 acre- mixed use development outside the Urban Development Boundary, it is essential to recognize that such a project would not erode the county's agricultural capacity. With approximately 68,800 acres- of active farmland already in place, displacing 1,000 acres does not jeopardize the county's ability to maintain its agricultural output or economic thresholds, particularly when the dominant revenue generator is nursery/floriculture grown in other areas of South Dade, not the row crops which were farmed on the land upon which the project is being developed.

Notably, Miami-Dade's position in ornamental plant production—ranking first in the U.S.—and its continued expansion illustrate that nursery/floriculture is stable.

¹ University of Florida Evaluation of Agricultural Land Use Trends and Outlook in Miami-Dade County; p. ES-3

² University of Florida Evaluation of Agricultural Land Use Trends and Outlook in Miami-Dade County; p. 23

³ Indeed, the reason why the development land is currently leased and farmed is because the owners are able to benefit from the ad valorem exemption associated with agricultural land and despite an expectation and attempt at making a profit from farming, the land has failed to generate any profit for the owners.

However, sustaining nursery and floriculture production requires relatively modest land allocations. Of the county's roughly 13,300 acres devoted to nursery/floriculture, increased greenhouse use, and advanced production techniques can accommodate market demand with little or no additional farmland. Additionally, while nursery and floriculture have thrived in the past, the County's own agricultural report indicates that future demand for new nurseries and floriculture will be limited given increased competition from other states: *"The nursery/floriculture industry, the dominant agricultural sector in Miami-Dade County, has been the most rapidly growing major segment of U.S. agriculture for the past 30 years, but is now considered a mature industry with slower growth rates likely in the future"*⁴ Indeed, the University of Florida report indicates that demand for farmland overall is expected to decrease over the next several decades from 68,837 acres in 2022 to 56,284 acres in 2050 or a reduction of more than 12,000 acres. Compared to the 68,837 acres used for agriculture in the 2022 Census, by 2030 alone, the mean projected demand for agricultural land in Miami-Dade County will decline by more than 4,000 acres and another 4,000 +/- by 2040 according to the county's own report.⁵ In this context, a 1,000-acre development—even sited outside the UDB—can proceed without any impact on the county's agricultural economy⁶.

In summary, the county's agriculture future lies in embracing nursery and floriculture as its dominant agricultural engine. A mixed-use project of the size proposed—carefully sited and planned—will not erode Miami-Dade's agricultural capacity. On the contrary, by facilitating strategic land-use shifts toward high-value agriculture, the development can preserve both economic vitality and farmland integrity.

⁴ University of Florida Evaluation of Agricultural Land Use Trends and Outlook in Miami-Dade County; p. 29

⁵ University of Florida Evaluation of Agricultural Land Use Trends and Outlook in Miami-Dade County; Mean of 5 mid-range projections Table 20.8 p. 225

⁶ On March 19, 2024, the Miami-Dade County Board of Commissioners adopted Ordinance No. O-24-27 which amended Sections 33-1, 33-8, 33-14.1 and 33-279 of the Miami-Dade County Code of Ordinances and created the Miami-Redland Agritourism District ("MRAD") The MRAD is the area consisting of lands that are located outside the UDB, are part of the Agricultural District, and are located between SW 88 Street/Kendall Drive and Old Ingraham Highway. The amendment primarily expanded the permitted range of commercial and entertainment uses. For example, it added outdoor amusements such as pub games, inflatable waterslide pools and other small water-related or inflatable devices, zip lining, and paintball.

It also introduced a requirement for Conditional Use ("CU") approval and applicable permits for mobile food service operations on agricultural zoned ("AU") properties. In addition, the amendment removed the requirement for applicants in the AU district to obtain Environmental Quality Control Board ("EQCB") approval for food service on properties served by well, septic tanks, or both, allowing instead for administrative review and approval.

Finally, the amendment removed CU requirements for certain agricultural uses, including but not limited to, barns, sheds, small packing facilities, dairy barns, cattle or stock grazing, and farm stands. The amendment primarily addresses agritourism and are intended to help local farms diversify their operations for entertainment purposes under less restrictive regulations.

Applicant shall:

- a. Detail how its proposed development will not infringe on equipment movement for agricultural properties within the area.**

The CSX railroad runs adjacent to the northern boundary of City Park. Currently, there is one rail crossing in northwest corner of the Project Site at theoretical NW 136 Avenue. Farm equipment may continue to use this crossing in the future.

- b. Provide methodologies, assumptions, data sources, and analyses used to analyze SERPM the implications of converting the project site from Agriculture to other uses.**

The methodologies, assumptions, data sources, and analyses used to respond to each ADA Question are noted in each response.

- c. Include a conceptual stormwater master plan that assesses existing, planned development and adjacent land uses including agricultural and other uses. Stormwater management was modeled by DERM with the project site as agriculture. The Applicant should address how the development program would enhance or degrade regional drainage.**

See response to ADA Question 19 – Stormwater Management.

The Applicant shall prepare a conceptual stormwater management plan for the overall development utilizing the following data sources, methodologies, and assumptions.

- **Utilize Miami-Dade County's Average October Water Table and Miami-Dade County Flood Criteria Maps for design groundwater elevation and county flood criteria.**

See response to ADA Question 19 – Stormwater Management.

- **Utilize SFWMD ERP Applicant's handbook for total rainfall depth for key design storms.**

See response to ADA Question 19 – Stormwater Management.

- **SCS Design Methodology to estimate total runoff volume generated by the development.**

See response to ADA Question 19 – Stormwater Management.

- **Utilize Harper Methodology, as developed with FDEP, and the BMP Trains software to determine the pre-development vs. post-development nutrient loading concentrations.**

See response to ADA Question 19 – Stormwater Management.

- **Assume a 2-foot rise in groundwater elevations due to sea-level rise as currently proposed by Miami-Dade County in the Stormwater Management Program Master Plan Update (FY2021) prepared by Miami-Dade County and GIT Consulting, LLC.**

See response to ADA Question 19 – Stormwater Management.