



Miami-Dade Democratic Environmental Caucus

Board of County Commissioners
Esteban L. Bovo, Jr., Chairman
Stephen P. Clark Center
111 NW 1st Street
Miami, Florida 33128

May 15, 2018

Re: *Application of American Dream Miami and the Graham Companies for CDMP Amendment*

Honorable Chairman and Commissioners:

The Miami-Dade Democratic Environmental Caucus has as its primary mission working with Democratic candidates and elected officials on matters of concern to County residents and the environmental experts and activists with which the Caucus engages. As each of you serves in a non-partisan role on behalf of your constituents and as stewards of their resources, however, we are writing to urge you to consider the environmental consequences of approving the Applications, CDMP Amendments and Zoning Applications on the Board's May 17, 2018 agenda and to vote against them.

Each of our County's most dire environmental threats are certain to be exacerbated if the largest mall in the country is built on the edge of the Everglades. Building and operating the so-called "American Dream" will involve:

- **Paving over more than one square mile of existing agricultural and open lands¹** that currently recharge our imperiled Biscayne Aquifer, after replacing all of the existing absorbent and filtering soils with imported construction-grade fill and cement.
- **Creating a massive urban heat island** and contributing substantially to stormwater management loads.²

¹ 174 acres for the mall, 334 acres for the associated Graham Companies project, and likely undercounting the many associated road-widening and ramp-building projects.

² Issues identified by Florida Department of Economic Opportunity, Letter of James Stansbury, March 17, 2017, Bureau of Community Planning and Growth, <https://www.miamidade.gov/govaction/legistarfiles/Matters/Y2018/181206.pdf> Note that to the limited extent stormwater runoff has been addressed in the Development Agreement and elsewhere, it is based on addressing the impact of a 25 year, 3 day storm,

- **Drawing as much as two million gallons per day of potable water** and more than 100,000 additional gallons of non-potable water. This is more than 20% of the total current output of the Hialeah RO Water treatment plant (ADM's only source) and will substantially increase the plant's energy requirements and waste output, and likely hasten an expansion of the plant's capacity at significant expense to the public. Though the water is to be drawn from the Upper Floridan Aquifer, drawdown in that source is a matter of continuing concern and study.
- **Consuming upwards of 1400 megawatt hours of daily electric power – enough to power nearly 40,000 homes³** – and resulting in a significant increase in CO₂ emissions unless the mall contracts for power from a renewable energy facility.
- **Promoting sprawl and threatening the existing Urban Development Boundary**, with siting and design contrary to our existing Comprehensive Development Master Plan and any responsible concept of urban planning. ADM's proximity to existing water and wildlife management areas, its location far from existing transit lines and public services, and the plans for the 20 year expansion of the Graham Companies properties are all certain to spur the rapid, westward growth of the County.
- **Adding 80,000 individual external automobile trips per day to existing traffic** in the region, increasing CO₂ emissions (not least from delivery vehicles), exacerbating the county's already-acute traffic problem, creating additional pressure to build more roadways (with their attendant environmental and development impacts), and further contributing to the light, sound and air pollution in surrounding neighborhoods and remaining wild areas.
- **Further delaying the implementation of the SMART Plan and other significant transit initiatives**, by squandering the opportunity to utilize a project the State of Florida has identified as an "ideal candidate for transit oriented development."⁴
- **Complicating disaster recovery and resiliency planning** by bringing over 100,000 visitors per day, thousands of new residences, and all of the employees required to keep them running to a low-lying and flood prone area of the County.⁵

hardly an appropriate standard for improving the resiliency of essential county facilities.
<https://www.miamidade.gov/govaction/legistarfiles/Matters/Y2018/181204.pdf>

³ Based on available data showing average Florida monthly home usage of 1,078 kwh per month (35.44 kwh per day.)

⁴ See Stansbury (ibid.) The notion that any of the County's transit or traffic related goals will be furthered by the planned "purchase of 11 standard 40' buses, in lieu of road impact fees" and the construction of "bicycle storage facilities to encourage the use of alternative modes of transportation" would be laughable if the consequences were less dire.
<https://www.miamidade.gov/govaction/legistarfiles/Matters/Y2018/181204.pdf>

⁵ The site lies at less than 2 feet above sea level and even at current sea levels is at risk of storm surge from category 3 storms and higher.
<https://sfwmd.maps.arcgis.com/home/webmap/viewer.html?useExisting=1&layers=3fcd50f64746464fb31f5ba8e749528f#>

We are not against development or growth. Properly done they provide for the jobs we need and the sustainable future our County's residents deserve. To that end, the Comprehensive Development Master Plan exists to promote development in locations which "optimize efficiency in public service delivery and conservation of valuable natural resources." The applications before you this week would not simply amend the Plan, they would tear away at its very fabric.

This is Miami-Dade County, one of the world's greatest attractions. Our beaches, our Everglades, our weather, our waters, our hospitality and our unique amalgamation of cultures draw visitors and future residents to our shores. Perhaps Minneapolis and West Edmonton and the Meadowlands need indoor waterparks and imitation environments to flourish. We do not.

There are many more reasons why the American Dream project is wrong for Miami-Dade, and many others have raised them and will continue to do so. As concerned residents, and politically active environmentalists, however, we call on all of you simply to protect our resources, fight sprawl, and vote "no" on all of the CDMP amendments and zoning applications before you.

Thank you for your consideration.

A handwritten signature in black ink, appearing to read 'DTH' with a long, sweeping underline.

Dustin R. Thaler
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cc: Hon. Carlos A. Giménez, Mayor