

January 28th, 2026

Mayor Daniella Levine Cava
Miami-Dade County
111 NW 1st Street, 29th floor
Miami, FL 33128
Sent Via Email to mayor@miamidade.gov

RE: Request For Mayoral Veto- Kelly Tractor CDMP20230013

Madame Mayor Daniella Levine Cava,

The Hold The Line Coalition and environmental, civic, and community organizations respectfully request you to VETO the Board of County Commissioners' (BCC) approval of Comprehensive Development Master Plan (CDMP) Application CDMP20230013 (Kelly Tractor). Approval of this application establishes a dangerous precedent: that CDMP policies may be selectively altered to accommodate individual applicants, rather than applied consistently in the public interest. This approval erodes public confidence in the development process and invites further pressure on protected lands at a time when Miami-Dade County faces increasing climate, flooding, and water-quality challenges.

This application is inconsistent with established CDMP procedure and should have been denied if presented appropriately as a Future Land Use Map Amendment (FLUM) for the following reasons:

- The use of a text amendment to facilitate a private, site-specific industrial project circumvented the UDB expansion procedure defined in LU-8E, LU-8F, LU-8G, LU-8H and weakens the CDMP as a uniform, rules-based framework.
- The use of a text amendment allowed Kelly to evade the FLUM amendment procedure defined in LU-8E requiring a “deficiency” to expand the UDB, and relied upon the applicant’s artificially constrained site analysis that screened out alternatives inside the UDB. (*Appendix D*)
- Authorizes incompatible, intensive industrial activity outside the UDB on a site dominated by 163 acres of high-quality wetlands that provide essential flood protection, water filtration, and ecological support for Biscayne Bay. (*Appendices A & B*)
- The application lacks a feasible and sufficient wetlands avoidance, minimization, and mitigation strategy, despite the presence of Wetlands of Regional Significance and 62 acres subject to restrictive covenants resulting from prior enforcement actions against Kelly. (*Appendix E*)

Additionally, **we believe the Board misinterpreted the administration’s guidance in your Memo supporting the March 2023 Terra 137 application (*Appendix C*).** During the January 22nd CDMP hearing, the Board entertained Kelly’s argument that the approval of Terra 137 on nearby land established a “precedent” based on similar site and project characteristics. This could not be more wrong.

Key elements of Terra 137’s application:

- **Addressed a clearly identified deficiency inside the UDB**, an ongoing shortage of truck parking acknowledged by Planning staff and addressed by multiple policy initiatives
- **Applied for a FLUM amendment and Terminal designation**, providing security the site would be used for the stated purpose and public benefit
- **Provided a clear public benefit** by servicing any business in the trucking industry

- **Consistent with prior County policy** to expand truck parking capacity and uphold code requirements discouraging illegal parking which diminished public goods and safety
- **Created 40 acres of unavoidable wetland impacts** in order to serve a public interest where a reasonable alternative did not exist

In stark contrast, Kelly Tractor’s application:

- **Failed to establish a deficiency inside the UDB** or conduct a countywide search to establish a lack of alternatives inside the UDB
- **Applied using a text amendment that does not require a concurrent Zoning application**, creating uncertainty about the ultimate disposition of the site
- **Provides a primarily private benefit and possibly a competitive advantage to a single business**, potentially limiting any net benefit to the construction sector as a whole
- **Inconsistent with prior county policy emphasizing wetlands protection** when development is not “clearly in the public interest and no other reasonable alternative exists”(CON-7A). Available industrial sites inside the UDB were identified by county staff (*Appendix D*)
- **Destroys or degrades 163 acres of wetlands** including 62 acres with restrictive covenants in perpetuity as a result of prior unpermitted work by the applicant (*Appendix A*)

The substantial differences between the application formats, private versus public benefits, the scale of impacts and required mitigation, and the availability of alternatives to Kelly’s site make an appeal to “precedent” inapt and unsupported by evidence. **The Board cannot conjure a precedent without establishing a clear, consistent test to apply it. The entire debate could be avoided if the Board simply instructs applicants to adhere to the established guidance of the CDMP.**

The precedent at issue is not the substance of this application, but the unexplained use of a text amendment to facilitate its approval. Using a text amendment to lower CDMP approval standards undermines the purpose of the ongoing stakeholder-driven Evaluation and Appraisal Report (EAR) process, which exists to assess and amend growth policies comprehensively and transparently. If the EAR process and the CDMP are to retain their authority and credibility, this misuse of text amendments must be addressed. **Vetoing this application and directing any policy changes to the EAR cycle would be a necessary first step.**

Madame Mayor, the veto authority vested in your office is a critical safeguard. We respectfully ask that you exercise your authority to reverse the Board’s action, uphold the County’s impartial planning process, and reaffirm Miami-Dade’s commitment to a uniform set of rules and rigorous environmental stewardship. Thank you for your leadership and for your continued commitment to responsible, resilient growth in Miami-Dade County.

Sincerely,



**Laura Reynolds, Science Director
Hold The Line Coalition**

The Hold The Line Coalition Steering Committee

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Executive Director
Friends of the Everglades

Paul Owens

President
1000 Friends of Florida

Lauren Jonaitis

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Tropical Audubon Society

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Member, Urban Environment League

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Urban Paradise Guild

Victor Dover

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Dover, Kohl & Partners

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Ra Schooley

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Schooley Farms, LLC

Albert Gomez

Industrial Components, CEO
BBMHS Advisory Committee

Katy Sorenson

Former Miami-Dade County Commissioner
District 8

Dwight Bullard

Senior Political Advisor
Florida Rising

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CC: Lourdes Gomez, RER Director
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Hold The Line Veto Request -
CDMP20230013 Kelly Tractor
Appendix A

HTL Recommendation Letter- 1-20-2026

January 20th, 2026

Miami-Dade County Board of County Commissioners

111 NW 1st Street, Suite 220

Miami, FL 33128

RE: CDMP20230013 Kelly Tractor Application

The Hold the Line (HTL) Coalition—an association of individuals, community groups, and organizations dedicated to responsible and sustainable land use in Miami-Dade County (MDC)—has reviewed the Kelly Tractor (hereafter “Kelly”) Comprehensive Development Master Plan (CDMP) application. In our July letter to the BCC (See Appendix A), we highlighted that Kelly’s application sharply deviates from the established CDMP procedure, **and would inappropriately allow intensive urban uses outside the Urban Development Boundary (UDB) that would unavoidably impact on-site high-quality wetlands that support the health of Biscayne Bay and reduce community flood risk.**

Since the July transmittal hearing, Kelly has made no substantive progress in resolving the serious deficiencies identified by Miami-Dade County planning staff. The application continues to conflict with multiple CDMP policies and objectives, which is precisely why staff issued a clear and well-founded Final Recommendation to DENY (Appendix B). We strongly agree with County staff’s analysis and conclusion. The BCC should uphold its professional planning staff’s recommendation and vote to DENY Kelly’s Application CDMP20230013.

Application Analysis

Before addressing the substantive harms and specific areas of incompatibility with CDMP elements that mandate a Deny vote, it is critical to reiterate the wildly inappropriate use of a text amendment to advance this application.

1.) The Board must uphold the integrity of the Comprehensive Development Master Plan (CDMP) and reject Kelly’s text amendment-based application. The Kelly application seeks to place intensive industrial uses on more than 240 acres outside the UDB on protected wetlands. Therefore, the amendment should be formatted as a Future Land Use Map application subject to evaluation by the criteria in CDMP LU-8F.

Kelly’s text amendment that creates a bespoke version of the CDMP on behalf of a single entity, at the expense of environmental resources that benefit all residents and Biscayne Bay restoration activities, is an alarming precedent. Rewarding this tactic jeopardizes the principle that the rules are applied equally to all in CDMP proceedings. The fact that Kelly owns a parcel that satisfies their self-selected criteria does not supersede the requirements of the CDMP.

2.) Approving Kelly's application without a FLUM amendment eliminates the requirement for a concurrent Zoning application, leaving the final disposition of the site undefined. This lack of detail and binding commitments create an unacceptable level of uncertainty about the final disposition of the site, and particularly Kelly's failure to present a workable plan to protect the 63 acres of Covenant protected wetlands on the site.

3). Kelly's site selection methodology employed arbitrary criteria that screened out viable alternatives to reach a predetermined conclusion (Analysis of Site Selection and Alternative Parcels, Appendix C). Again, the use of the text amendment shields the application from the more rigorous analysis required by LU-8F. The CDMP mandates that all properties zoned for industrial use inside the UDB must be considered before authorizing urban uses outside the UDB or expanding the boundary.

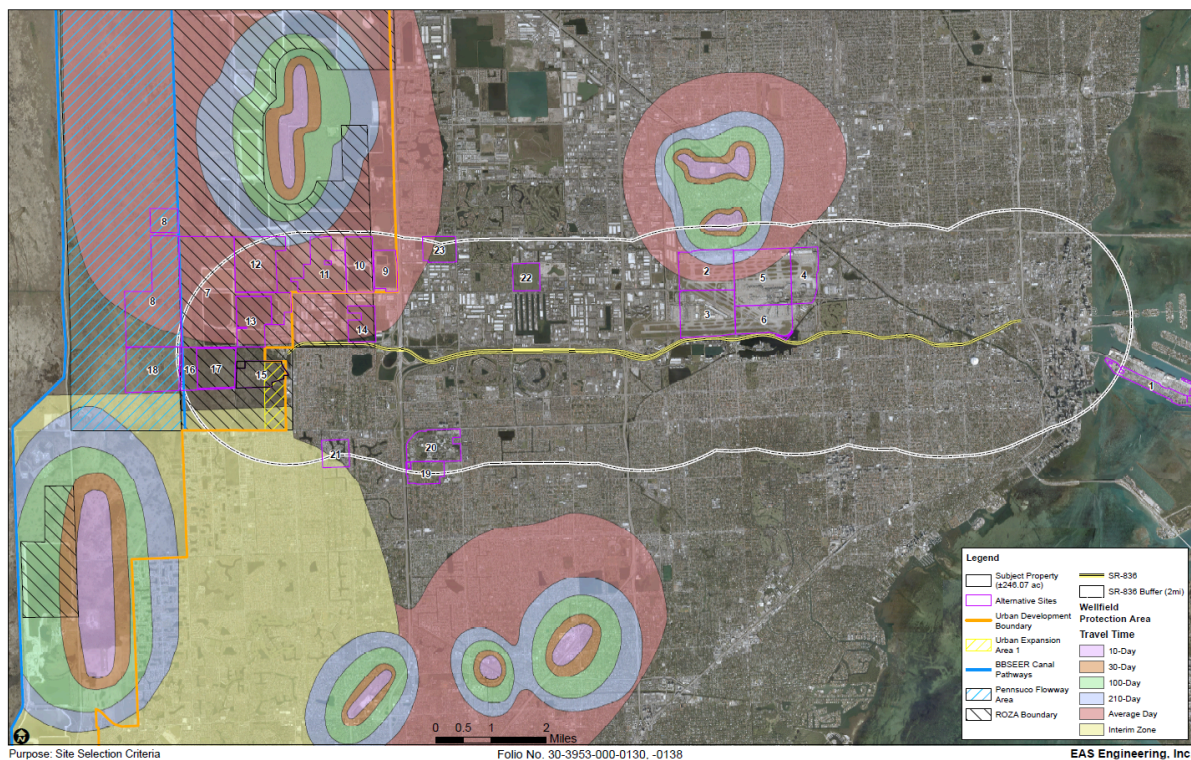


Figure 1: From Kelly's Site Analysis, the white bubble indicates the arbitrary geographical limit created by Kelly's selection process. The preferred Kelly property is in the black polyhedron to the left.

MDC Planning staff's analysis identified 782 acres of vacant, industrially zoned land in the North Central Planning Tier (Appendix G) including 9+ acres owned by Kelly adjacent to their current headquarters. **The BCC should deny the application until Kelly clearly establishes the need for such a large, contiguous site rather than using available land inside the UDB.**

CDMP Compatibility Analysis

The substance of the application contains multiple factors that conflict with CDMP policies intended to protect taxpayers from infrastructure costs associated with private development, conserve scarce resources outside the UDB, and allow the largest destruction of wetlands and endangered species habitat in recent memory without a workable plan to meet mitigation requirements.

Application Is Inconsistent With Objective LU-2 and Objective CIE-5

Staff's Final Recommendation concludes "[Kelly] fails to demonstrate that the roadways necessary to adequately serve the proposed 'MIA Equipment and Supportive Services Area' are available or will be built along with the proposed development."

A primary reason for prohibitions on development outside the UDB is the need to construct and maintain infrastructure that will need to be maintained at taxpayer expense. In this case, Kelly fails to provide sufficient capital outlays to fund right-of-way acquisition and construction costs, shunting those expenses onto the public purse. Other sites inside the UDB excluded from Kelly's site analysis would obviate the need for costly new roadway infrastructure. **Taxpayers should not be asked to subsidize new construction outside the UDB when alternatives are available.**

Text Amendment Broadly Alters Policy For Open Land Subarea 3

Kelly introduces language permitting uses "supportive" of limestone quarrying that would automatically allow potentially incompatible uses across all of Open Land Subarea 3. The CDMP Land Use Element defining activities in Open Land Subarea3 states:

"Uses that could compromise groundwater quality shall not occur in this area. Any land alteration and development in the Bird Drive or North Trail basins shall conform to the wetland basin plans adopted for those basins pursuant to policies of the CDMP."

It is wholly inappropriate to make policy changes across the entire Subarea via an individual application and this change should be removed or denied.

Kelly Has Not Presented A Viable Wetlands Mitigation Plan

As discussed extensively in our prior letter (Appendix A), **MDC's Department of Environmental Resource Management (DERM) Review dated April 21st, 2025 (Appendix E) determined that Kelly's application is inconsistent with Objectives CON-7 and Policy CON-9A of the CDMP.** The site has 162 acres of Wetlands of Regional Significance protected by CDMP Policy CON-7A. 63 wetland acres also carry restrictive

covenants on site as part of a settlement for prior unpermitted work by the Applicant. The Applicant has failed to present a feasible mitigation strategy to protect or replicate the functions of the high-quality wetlands essential to MDC commitments to revitalize Biscayne Bay and protect “habitats critical to threatened and endangered species”. Kelly’s continued assertions that wetlands and habitat on site have been degraded have been consistently refuted by DERM’s analysis, and ignores Kelly’s own history of unpermitted work on the property (Appendix D, Kelly Permitting Timeline).

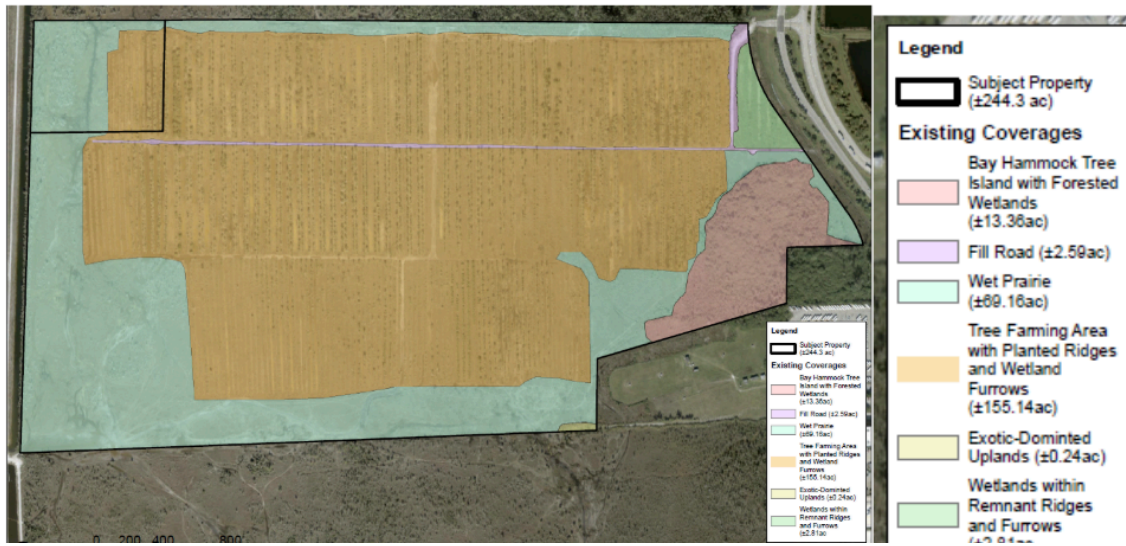


Figure 2: EAS Engineering’s map shows wetlands and wet prairie (brown and sea green) comprise the vast majority of current habitat on the parcel.

RER-DERM’s December 23rd, 2025 (Appendix F) memo highlights continuing deficiencies and lack of clear compliance with criterion 4 and 5 of CON-7A, CON-9 and potential conflict with County Code 24-48 noting:

“RER notes that section 24-48 of the Code states that the purpose of mitigation is solely to compensate for unavoidable adverse environmental impacts, that mitigation should not be used to make an otherwise non-permittable project permittable and that mitigation plans should maximize the preservation of existing natural resources.”

“that the ‘Conceptual Stormwater Management Master Plan’, dated December 6, 2024, proposes stormwater management locations in areas that are under preservation and enhancement requirements as per the restrictive covenants”.

In our July comments, we pointed out the fatal flaws of this application that must result in a Denial, and Kelly has done little in 6 months to remedy those deficiencies. MDC staff has also issued a Final Recommendation to Deny. The inappropriate text amendment format grants extraordinary deference to Kelly to avoid CDMP mandated scrutiny and effectively define their own approval process. As staff have noted, in multiple areas- capital upgrades, stormwater planning, wetlands avoidance and mitigation- Kelly has fallen far short of the standards required by the CDMP and the standards applied to other applicants.

Approving this application not only grants special treatment to Kelly, but invites future applicants to use text amendments to evade inconvenient requirements or introduce incompatible uses. Approving this application calls into question the BCC's commitment to a rules-based comprehensive planning process, fiscally responsible development, and commitments to protecting environmental resources and restoring Biscayne Bay. **The Board's recommendation must be to DENY.**

Sincerely,



Laura Reynolds
Science Director, Hold the Line Coalition

The Hold The Line Coalition Steering Committee

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Hold The Line Veto Request-
CDMP20230013 Kelly Tractor
Appendix B

Excerpt From MDC Planning's Final
Recommendations Report

Final Recommendations Report

Kelly Tractor Company,
Application No. CDMP20230013
Commission District 12 Community Council 5

APPLICATION SUMMARY

Applicant/Representative:	Kelly Tractor Company/Luis Figueredo, Esq., Joseph Goldstein, Esq., Juan Mayol Jr., Esq., Alessandria San Roman, Esq., Holland & Knight LLP
Location:	West of NW 137 Avenue and SR-836 Interchange, and north side of theoretical NW 6 Street
Total Acreage:	±246.07 gross acres/net acres
Current Land Use Plan Map Designation:	"Open Land" (±244.37 acres) and "Industrial and Office" (±1.70 acres)
Requested Land Use Plan Map Designation and Other Changes:	<ol style="list-style-type: none">1. Redesignate the application site on the Land Use Plan map to: "Terminals" (±244.37 acres) and "Industrial and Office" (±1.70 acres) <i>(Request withdrawn by the Applicant)</i>2. Expand the Urban Expansion Area (UEA) to include the application site <i>(Request withdrawn by the Applicant)</i>.3. Amend the "Terminals" land use category text of the Land Use Element to create the "MIA Transportation and Infrastructure Support Area" <i>(Request revised by the Applicant to instead amend the "Open Land Subarea 3" land use category text to create the "MIA Equipment and Supportive Services Area")</i>.4. Add the proffered Declaration of Restrictions in the Restrictions Table in Appendix A of the CDMP Land Use Element, if accepted by the Board.5. Amend the CDMP Capital Improvements Element, Table 10A Projects with Developer Responsibility to Construct or Cause to Construct to include developer funded roadway project.

Amendment Type: Standard
Existing Zoning District/Site Condition: GU (Interim) / Agricultural uses

RECOMMENDATIONS

Staff Final Recommendation: **DENY** (January 2026)
Staff Initial Recommendation: **TRANSMIT** (July 2025)
Country Club of Miami Community Council (CC5): **DENY AND DO NOT TRANSMIT** (July 8, 2025)
Planning Advisory Board Acting as the Local Planning Agency: **TRANSMIT** (July 14, 2025)
Transmittal Action by the Board of County Commissioners: **TRANSMIT AND ADOPT** (July 17, 2025)
Final Action by the Board of County Commissioners: **TO BE DETERMINED** (January 22, 2026)

Staff's final recommendation is to **"DENY"** the proposed standard amendment to the Comprehensive Development Master Plan (CDMP) as revised by the Applicant to amend the "Open Land" land use category and the "Open Land Subarea 3" text of the Land Use Element to create the 'MIA Equipment and Supportive Services Area', for the following reasons below.

This AMENDED application comes in the form of a text change (instead of a UDB amendment application) but nevertheless introduces fully urban uses outside the UDB without providing for the adequate roadway infrastructure. Such a lack of infrastructure would be unprecedented for an approval associated with such uses, burdening the County and public dollars with the expense of the necessary infrastructure for a new development outside of the urban service area. Although the application proposes to mitigate this impact through a proportionate share mitigation, such mitigation is insufficient and inappropriate outside the urban service area, particularly in the context of the introduction of urban uses AS the applicant's proposed mitigation will not fully address the fiscal impact to the County of allowing the requested use outside the UDB. While the application's location in the SMART Corridors area was one element that made it worthy of transmittal, it has not demonstrated a need for the location of the proposed uses outside the UDB, which is aggravated by the lack of commitment to the necessary infrastructure to support the development and further exacerbates the analysis of the expected impacts on Wetlands of Regional Significance. As noted below, the ±246-acre property subject to this business relocation contains ±162 acres of wetlands, of which ±51 acres are within the Urban Expansion Area (UEA) and ±111 acres are outside both the Urban Development Boundary (UDB) and the UEA, and has not yet demonstrated how it proposes to mitigate those impacts.

Additional text changes requested by the applicant are overly broad and would unnecessarily extend the impact of their application. An amendment allowing uses supportive of limestone quarrying in the totality of Open Land Subarea 3 introduces potentially detrimental uses in environmentally sensitive area, including the Bird Drive Basin, well outside of the boundaries of the subject parcel. In addition, the application proposes that new uses, beyond those requested by this application, could be approved without the need for a 2/3 vote of the Board. Since this parcel will remain outside the UDB, future changes should require a 2/3 vote and be considered in a manner consistent with the evaluation that would occur for any use outside the UDB and sensitive to the environmental significance of the area. The application also proposes a new allowance for "freight rail terminals" on the site without any associated development criteria. Without these criteria, the potential impacts of the proposed freight rail terminal, which could include a variety of new urban uses (i.e. retail, offices, restaurants), cannot be determined and therefore should not be included.

Principal Reasons for Recommendation:

1. The application to facilitate the relocation and expansion of the existing Kelly Tractor business from its current location inside the Urban Development Boundary (UDB) to a ±246.07-acre site primarily outside the UDB continues to generate concerns and therefore Staff recommends its denial. The application was heard and transmitted by the Board of County Commissioners at its July 2025 CDMP meeting and at that time, Staff recommended its transmittal in the Initial Recommendation report dated July 2025. Staff noted several concerns with the application regarding the traffic and environmental impacts the development it proposes would generate, but also recommended transmittal to allow additional time for the concerns to be properly and adequately addressed. Staff's current concerns are regarding traffic and the needed roadway improvement and concerns with the Applicant's proposed "MIA Equipment and Supportive Services Area" text.

As discussed below in Principal Reason No. 2, the application does not provide for the roadway infrastructure necessary to adequately serve the development it proposes to be relocated to a site outside the UDB and the Environmental concerns are addressed in Principal Reason No. 6 below. Staff's concerns with the Applicant's proposed "MIA Equipment and Supportive Services Area" text are discussed in Principal Reason Nos. 3, 4, and 5 below.

It must be noted that Staff's Initial Recommendation of transmittal was based primarily on the fact the area subject of the application is within ½-mile of the East-West Strategic Miami Area Rapid Transit (SMART) Plan corridor and within the County's Transportation Infrastructure Improvement District (TIID), and the merits of facilitating the expansion of an existing business in Miami-Dade County under the appropriate circumstances.

2. The application is inconsistent with CDMP Land Use Element Objective LU-2 and Capital Improvements Element Objective CIE-5 as it fails to demonstrate that the roadways necessary to adequately serve the proposed "MIA Equipment and Supportive Services Area" are available or will be built along with the proposed development. CDMP Objective LU-2 provides that "[d]ecisions regarding the location, extent and intensity of future land use in Miami-Dade County, and urban expansion in particular, shall be based upon the physical and financial feasibility of providing, by the year 2030, all urbanized areas with services at levels of service (LOS) which meet or exceed the minimum standards..." Similarly, Objective CIE-5 provides that "[d]evelopment approvals will strictly adhere to all adopted growth management and land development regulations and will include specific reference to the means by which public facilities and infrastructure will be provided." CDMP policies, particularly those related to infrastructure outside the UDB, presuppose that urban uses would be accompanied by all necessary and supporting infrastructure.

The Applicant's traffic impacts analysis shows NW/SW 137 Avenue from NW 6 Street to SW 8 Street is projected to operate in violation of its adopted level of service (LOS) standard both in the short-term (year 2026) and the long-term (year 2045) and would be significantly impacted by the traffic from the proposed development (the proposed Kelly Tractor business relocation and expansion). Staff previously noted this in Principal Reason No. 7(ii) of the July 2025 Initial Recommendation report stating that any development, particularly existing development to be relocated as proposed to a site outside the Urban Development Boundary (UDB) must ensure that adequate infrastructure is available or provided for the development. NW/SW 137 Avenue intersects SW 8 Street by a bridge over the C-4 Tamiami Canal that runs along the north side of SW 8 Street. The C-4 Tamiami Canal is a constraint on efforts to widen this segment of NW/SW 137 Avenue north of SW 8 Street beyond its current 9-lane configuration (6 through lanes and three turn lanes). Consequently, efforts to provide additional roadway capacity in the area include alternative roadways such as NW/SW 139 Avenue from SW 8 Street to NW 6 Street, identified in the CDMP as a future 4-lane roadway to the west NW/SW 137 Avenue. It is noted this referenced segment of NW/SW 139 Avenue is outside the UDB and within the Urban Expansion Area (UEA).

The Applicant has committed in the proffered Declaration of Restrictions (covenant) to provide its proportionate share mitigation payment for the traffic impacts of the proposed development. However, such a proportionate share mitigation payment does not ensure the needed roadway capacity would be provided at the time of development, as the payment would not be adequate to fund the cost of right-of-way acquisition and construction of the needed roadway at that time, and the application does not identify how or where the needed roadway infrastructure would be built. Without a commitment from the Applicant, public dollars would likely have to be expended in order to accommodate the private applicant's development. To adequately address the roadway failure, the applicant would need to provide for the necessary infrastructure by either committing to constructing or causing the construction of an appropriate roadway improvement. To the extent that other development may cause the construction of adequate alternatives, the applicant could also elect to commit to not opening facilities until such infrastructure is provided. While NW/SW

139 Avenue is identified in the CDMP as a future 4-lane roadway, it is not funded and therefore not included in the Transportation Improvement Program (TIP) nor the 2045 Long Range Transportation Plan (LRTP) of the Miami-Dade Transportation Planning Organization (TPO). Consequently, the application fails to demonstrate the appropriate coordination of land use and transportation planning as required by the CDMP. It is therefore recommended that the application be denied.

3. The application proposes changes to the 'Open Land Subarea 3' text of the Land Use Element to allow uses that are "supportive" of limestone quarrying, but this change would introduce an overly broad and undefined allowance into the CDMP for environmentally sensitive areas that extend substantially beyond the Kelly Tractor relocation site. The areas that would be impacted by this overly broad allowance include the Bird Drive Basin area outside the UDB, south of SW 8 Street and east of Krome Avenue/SW 177 Avenue, and could introduce uses that conflict with the Comprehensive Everglades Restoration Plan (CERP) and other environmental efforts. This particular component of the requested CDMP text changes is unnecessary and is included to introduce the "MIA Equipment and Supportive Services Area" text that is also proposed to be added to the 'Open Land Subarea 3' text, and both changes are presented herein beginning on page 21. While the development proposed by the Applicant is described as "supportive" of limestone quarrying, it is also supportive of a host of other industries to include construction, logistics and distribution, among others, as stated in the proposed "MIA Equipment and Supportive Services Area" text. Accordingly, Staff recommends this proposed change be either deleted (see CDMP Amendment Requests on page 21) from the proposed "MIA Equipment and Supportive Services Area" text or be denied.
4. The proposed "MIA Equipment and Supportive Services Area" text includes an allowance for "freight rail terminals" without providing appropriate standards or criteria to guide the development of this particular proposed use. It must be noted that Railroad Terminals are currently allowed by and described in the CDMP to include uses designed to serve the traveling public and on-site employees, such as offices, personal services, retail activities, restaurants, auto rental businesses, and lodging establishments. While the application does not include the necessary criteria to guide development of the proposed "freight rail terminals" use and does not distinguish the proposed use from Railroad Terminals, it also is not a necessary component of the proposed application. Staff recommends this change be denied (see page 23, under CDMP Amendment Requests).
5. The "MIA Equipment and Supportive Services Area" text proposed for addition into the CDMP includes language to the effect that subsequent actions to approve any other use or to liberalize the standards governing the uses within the "MIA Equipment and Supportive Services Area" must be approved by the Board of County Commissioners (BCC). To provide for a standard of review appropriate to the environmental sensitivity and significance of the area, Staff recommends that at least a two-thirds majority vote of the BCC be required for any such subsequent CDMP amendments, if this application were to be approved (see page 21, CDMP Amendment Requests).
6. The application to facilitate the relocation and expansion of the existing Kelly Tractor business from its current location inside the Urban Development Boundary (UDB) to a site primarily outside the UDB would generate significant impacts to Wetlands of Regional Significance, the mitigation of which are not demonstrated to be in full compliance with CDMP Objectives CON-4 and CON-7, and Policies CON-4A and CON-7A. These objectives and policies of the CDMP's Conservation, Aquifer Recharge and Drainage Element prohibit the degradation or destruction of wetlands that are habitat critical to endangered or threatened species and provide that Wetlands of Regional Significance depicted on Figure 14 of the CDMP Land Use Element may be impacted under certain limited circumstances. Wetlands are crucial to the ecology and hydrology of the County and serve to provide habitat for wildlife and plant species (including endangered and threatened species), filter and purify surface and groundwater, provide direct recharge of water to the Biscayne Aquifer

(the County's primary source of drinking water), and provide stormwater storage and natural flood protection. The ±246-acre property subject of the Kelly Tractor business relocation contains ±162 acres of wetlands, of which ±51 acres are within the Urban Expansion Area (UEA) and ±111 acres are outside both the Urban Development Boundary (UDB) and the UEA.

Staff previously discussed the wetlands concerns in the Initial Recommendation report published July 2025 and concluded that the application does not demonstrate compliance with Policy CON-7A criteria, which outline five circumstances when impacts to the Wetlands of Regional Significance may be authorized (see Initial Recommendation Principal Reason No. 4 presented on page 10 herein). The application and support documentation assert that the application complies with two (2) of the five (5) circumstances outlined in Policy CON-7A (Criterion No. 4 and Criterion No. 5). Criterion No. 4 allows wetland impacts for activities carried out in accordance with an approved wetland basin management plan. The application area is in the North Trail Basin for which the approved North Trail Basin Management Plan (NTBMP) outlines Cut and Fill Criteria for stormwater management and has the objective that the desirable biological values of the basin are maintained or mitigated. Criterion No. 5 of Policy CON-7A allows wetland impact in highly disturbed or degraded wetland areas where restoration of a wetland with an equal or greater value is feasible. Staff's review concluded the wetlands in the area are not highly disturbed or degraded and thereby the application does not meet Criterion No. 5, and while the Applicant's proffered covenant commits to meeting the cut and fill criteria for the NTBMP, it does not demonstrate the biological values of the basin would be maintained or mitigated as required to meet Criterion No. 4. While the Cut and Fill criteria is one component of the North Trail Basin Management Plan (NTBMP), that alone will not demonstrate that habitat critical to threatened and endangered species would not be degraded or destroyed by the impacts of the proposed development. In the July 2025 report, Staff recommended the Board of County Commissioners (Board) "Transmit" the application to allow additional time for the Applicant to adequately address Staff's concerns with the application.

The Applicant subsequently submitted additional and updated information, including letters dated October 3, 2025, and November 20, 2025, and a Conceptual Stormwater Master Plan that seek to address compliance of the proposed development with the referenced objectives and policies (see Appendix B: Applicant's Correspondence). The information submitted does not demonstrate full compliance with the referenced objectives and policies but incorporates proffers committing to future compliance. The Applicant's revised proffered covenant commits to, among other things, not impacting the wetlands that are currently required to be preserved unless and until those requirements are modified through future permitting activities and modification of the existing permits, covenants, and restrictions. Among the other covenant conditions is a commitment that prior to the approval of certain development orders or permits (such as Class IV wetlands permits) for any portion of the property, the Owner shall conduct a survey to determine if listed species are present on site (see Proffered Declaration of Restrictions discussed on page 29 herein and Appendix A: Proffered Declaration of Restrictions on page A-3). Furthermore, the applicant's proposed "MIA Equipment and Supportive Services Area" text includes a requirement that any land development conform to the wetland basin plans and analyzed in accordance with Policy CON-7J pertaining to consistency with the Comprehensive Everglades Restoration Program (CERP). Any consideration of this proposal must also acknowledge that any land development in the application area will be evaluated for compliance with all applicable provisions of the CDMP.

The Applicant's covenant acknowledges that any plans and proposals for the submitted for "MIA Equipment and Supportive Services Area" during the County's consideration of the CDMP Application process are conceptual in nature and shall not be construed to release, amend or otherwise modify the existing permits, covenants and restrictions (see existing permits, covenants and restrictions discussion under Natural Resources on page 26 herein). The covenant further acknowledges and agrees that the County is in no way waiving its permitting jurisdiction and review

under Chapter 24 of the County Code nor will it entitle the Applicant or owner of the proposed “MIA Equipment and Supportive Services Area” to a favorable review of future permit applications as may be required by Chapter 24 of the Miami-Dade County Code. Should this application be approved, all permitting requirements of Chapter 24-48 must be met for any work in wetlands, including avoiding, minimizing, and mitigating impacts to wetlands on site and, in particular, any impacts to those wetlands that are already under preservation through Covenants with Miami-Dade County. The County will require impacts to wetlands be mitigated on site to the extent that, of the total required mitigation, a portion shall be implemented on site to provide 1 acre of mitigation for each acre of covenanted wetlands impacted and thereafter the remaining mitigation value may be implemented offsite but prioritized to occur in the North Trail Basin to the maximum extent feasible.

7. The Board of County Commissioners (Board) first heard Application No. CDMP20230013 at its July 17, 2025 CDMP public hearing (Transmittal Hearing) and voted to adopt and transmit the application to the Florida Department of Commerce (FloridaCommerce) in its capacity as the State Land Planning Agency, and the other state and regional agencies (Reviewing Agencies) for review and comment in accordance with Chapter 163.3184, Florida Statutes. As further discussed in the Background section of the Staff Analysis herein on page 25, the Reviewing Agencies issued correspondence finding no adverse impacts from the application, if approved, to any state or regional resources and facilities and therefore raised no objection against the application.

The Florida Department of Environmental Protection, The Florida Fish and Wildlife Conservation Commission, and The South Florida Regional Planning Commission each provided recommendations and Technical Assistance Comments, which will not form the basis of a challenge to the application if approved. These are further described below on page 27 herein in the “Response to State and Regional Reviewing Agency Comments” section. The correspondences from the State Land Planning Agency (SLPA), and the other Reviewing Agencies are included in Appendix C of this report (see Appendices Page A-69). In addition, no private party raised any objection against the application. Following the Board’s transmittal of the application, the applicant submitted additional data and analysis, and the most recently revised proffered covenant received October 10, 2025 (see Appendix A for the covenant and Appendix B for the additional data and analysis along with the RER- Environmental Code Coordination and Public Hearings staff response).

It is noted that while Staff raised the question of the proposed development’s consistency with the Comprehensive Everglades Restoration Plan (CERP), including the Biscayne Bay and Southern Everglades Ecosystem Restoration (BBSEER) project. The Reviewing Agencies, including the South Florida Water Management District, did not raise any concerns regarding the proposed development and impacts to CERP and BBSEER. The South Florida Water Management District has manangement responsibilities (with the Army Corpse of Engineers) for CERP and BBSEER.

8. The basis for Staff’s recommendation is outlined above and in the original analysis of the application included in the *Initial Recommendation* report, dated July 2025. The Principal Reasons published in the Initial Recommendation report and map series depicting the site of the withdrawn land use change request are presented below. The full Initial Recommendation report and other documents related to the application can be accessed through the following link: [CDMP20230013. https://energov.miamidade.gov/EnerGov_Prod/SelfService/#!/plan/85a528ca-fa52-4ba9-8a83-a24d51563e8e?tab=attachments](https://energov.miamidade.gov/EnerGov_Prod/SelfService/#!/plan/85a528ca-fa52-4ba9-8a83-a24d51563e8e?tab=attachments)

Principal Reasons for Recommendation, as stated in Initial Recommendations Report:

1. The application seeks to facilitate the relocation of the existing Kelly Tractor Company headquarters from its current location inside the Urban Development Boundary (UDB) adjacent to the SR-826 (Palmetto Expressway) interchange at NW 58 Street to a ±246.07-acre property located primarily outside the UDB, without adequately demonstrating there is a warranted need to relocate an urban use to a site outside the UDB. Furthermore, the proposed relocation site has significant environmental constraints and is in an area where one of the primary roadways (NW 137 Avenue) does not have the capacity to accommodate the traffic impacts from the proposed development, as discussed in Principal Reason Nos. 4 and 7.ii below, respectively. To accomplish the referenced relocation, the Applicant currently proposes to amend the “Open Land Subarea 3” CDMP Land Use Element text to allow for a variety of uses that are more akin to those permitted in urban land use categories inside the UDB than those permitted outside the UDB (see table of Proposed Uses on page 22 herein). Additionally, the proposed uses, if approved, would be substantially beyond the scale and range of uses currently at the existing Kelly Tractor facility that is inside the UDB, as discussed below. While facilitating the expansion of an existing business in Miami-Dade County has merit and should be encouraged under the appropriate circumstances, the application fails to demonstrate that adequate expansion of the existing business cannot be accomplished on the existing ±41.25-acre site plus a vacant adjacent ±9.43-acre parcel owned by Kelly Tractor that is also designated “Industrial and Office” inside the UDB.

The proposed relocation and expansion of the existing Kelly Tractor operations onto the ±246.07-acre site (Application Area) is to facilitate, as stated in the application, storing “a much larger inventory of heavy and specialized equipment to meet the County’s growing demand for years to come”. The application notes that the Kelly Tractor Company has operated in Miami-Dade County for over 90 years and comprises almost 260,000 square feet of buildings (equivalent of almost 6 acres of single-story buildings) plus outdoor equipment storage and other uses on the existing ±41.25-acre site which serves as its headquarters. The application proposes 2,703,400 square feet of buildings (equivalent of 63 acres of single-story buildings, over a tenfold increase) plus outdoor equipment storage and other uses on the ±246.07-acre site as detailed on page 27 herein. The information provided in the application and the Applicant’s supplemental data and analyses do not demonstrate the basis for the scale of the proposed expansion to warrant relocation to outside the UDB, particularly when viewed in regards to the site’s environmental constraints and the lack of adequate roadway capacity in the area as discussed in Principal Reason Nos. 4 and 7.ii below. Accordingly, Staff recommends ‘Transmittal’ of the application towards facilitating a long standing business in the community as outlined in Principal Reason No. 2 below.

2. The applicant’s proposed relocation of the existing Kelly Tractor operations to a primarily “Open Land” designated property located outside the UDB does not demonstrate consistency with the “Open Land” land use category and Land Use Element Objective LU-1 and policies LU-1B, LU-1C and LU-10A. Objective LU-1 and the referenced policies require the County to prioritize infill development on vacant sites in urbanized areas and redevelopment of substandard or underdeveloped, environmentally suitable urban areas contiguous to existing urban development where urban services and facilities have the capacity to accommodate additional demand. The existing Kelly Tractor site and the adjacent ±9.43-acre vacant Kelly Tractor parcel are appropriately designated and zoned for industrial uses, including expansion of the Kelly Tractor operations. Additionally, the "Open Land" text provides that lands so designated have been set aside for uses other than urban development and notes that such land is intended to

serve specified functions that include limestone quarrying, utility and communication facilities, compatible institutional uses, seasonal agriculture, recreational uses, and rural residences. Because Open Land areas primarily consist of wetlands, no use other than rural residential is definitely allowed (CDMP page I-73). The recommended transmittal of the application would allow the applicant additional time to adequately address these concerns.

The application and supplemental information do not demonstrate that industrial parcels within the UDB, particularly the existing Kelly Tractor site and the adjacent ±9.43-acre vacant Kelly Tractor parcel, are not sufficient to accommodate expansion of the Kelly Tractor operations to then warrant approval of the applicant's request to relocate the urban use onto the ±244.37 acres outside the UDB. Staff's analysis determined that 782.51 acres of vacant land are zoned or designated for industrial uses in the North Central Planning Analysis Tier (the analysis area where the application site is located generally north of SW 8 Street and south and west of Okeechobee Road). North Central Planning Analysis Tier has industrial land capacity for approximately 18 years at an annual absorption rate of 42.54 acres per year (see "Supply and Demand Analysis" on page 30). While it is acknowledged that there is no vacant industrial parcel inside the UDB of the size of the proposed site, the applicant has not adequately justified the need for a site this size for the existing or near-future needs of Kelly Tractor.

In addition, Staff conducted an analysis of businesses similar to Kelly Tractor and found that these establishments have not required the amount of acreage, nor the range of uses requested in the application. Kelly Tractor's headquarters is located in Miami-Dade County on the above mentioned ±41.25-acre site together with Pantropic Power, a business owned by Kelly Tractor. The existing site and the adjacent vacant ±9.43-acre industrial parcel are designated "Industrial and Office" on the CDMP Land Use Plan Map and located in the vicinity of SR-826/Palmetto Expressway interchange at NW 58 Street (west of the interchange). Kelly Tractor has several operations located throughout Florida, including Davie, West Palm Beach, Clewiston, Fort Myers, Mulberry and Orlando. These other locations operate on sites that are comparable or smaller than the existing location in Miami-Dade County. The largest of these satellite operations, in Fort Myers, occupies a total of ±43 acres, of which only ±28 acres are used for business; the remaining acres are vacant. In addition, as further detailed in the 'Regional and National Competitors' section of the Staff analysis herein on page 31, the local and regional competitors for Kelly Tractor operate on similar or smaller sized properties. While the CDMP encourages and supports the growth of businesses, such as through Economic Element Goal III, which calls for the County to increase employment and investment through assistance to business, among other things, it must be appropriately demonstrated that the relocation of the existing business to a location that is currently outside the UDB is warranted. As mentioned above, Staff recommends "Transmittal" of the application which would allow additional time for the applicant to adequately address these concerns.

3. Should the application be approved and the proposed development built, it would generate more tax revenue to Miami-Dade County than if the area remains undeveloped and would thereby further support the Strategic Miami Area Rapid Transit (SMART) Plan through the Transportation Infrastructure Improvement District (TIID). The ±246.07-acre application area is within one mile of the East-West Corridor, one of the SMART Plan corridors, and is bifurcated by the UDB, with ±244.37 acres outside the UDB and ±1.7 acres inside the UDB. The Miami-Dade Board of County Commissioners (Board) endorsed the SMART Plan corridors in 2016 (Resolution No. R-523-16) and, in 2019 (Ordinance 19-07), established CDMP policies for development of properties inside the UDB within one (1) mile of the East-West Corridor and one-half (1/2) mile of the remaining SMART Plan corridors. The application site is located within the SMART Plan related TIID, as established through Ordinance 18-8. Within the TIID, future

ad valorem tax revenue increases are captured to help fund the SMART Plan rapid transit projects in combination with other local, state, and federal funding sources.

4. The proposed development would impact Wetlands of Regional Significance on the application site located in the North Trail Wetland Basin as depicted in Figure 14 of the CDMP Land Use Element, and it is unclear this time the extent of such impacts and how those impacts would be mitigated. The application area contains approximately 162.19 acres of wetlands of which approximately 63 acres (± 40.3 acres of wetland agricultural furrows, ± 10.8 -acre bayhead, ± 12.3 -acre prairie) are preservation areas protected under covenants and associated with Class IV permit 2008-CLIV-PER-00056. CDMP Policy CON-7A states that the degradation or destruction of Wetlands of Regional Significance that may be contained within the areas depicted on the Wetlands of Regional Significance Map (Figure 14 of the CDMP Land Use Element) shall be limited to activities that (1) are necessary to prevent or eliminate a threat to public health, safety or welfare; or (2) are water dependent and no other reasonable alternative exists; or, (3) clearly in the public interest and no other reasonable alternative exists; or (4) are carried out in accordance with an approved basin management plan; or (5) are in areas that have been highly disturbed or degraded and where restoration of a wetland with an equal or greater value in accordance with federal, State and local regulations is feasible. Habitats critical to endangered or threatened species shall not be degraded or destroyed. The applicant asserts that the application qualifies under criteria #4 and #5, however staff analysis finds that these qualifications are not met.

The application and support documentation assert that compliance with the North Trail Basin Cut and Fill Criteria constitutes conformance with criterion #4 of Policy CON-7A. While the Cut and Fill criteria is one component of the North Trail Basin Management Plan (NTBMP), it includes broader goals and guidelines and directs that all proposed work requiring a Class IV permit be consistent therewith. The goals set out in the NTBMP (as adopted by Ordinance No. 92-80) are to ensure that development does not increase the risk of flood damage in the wetland basin or the basin of associated drainage canals and does not decrease necessary water storage or recharge of the Biscayne Aquifer and that desirable biological values of the basin are maintained or mitigated. The development proposed in the application has the potential to impact high quality wetlands that provide important water storage and recharge and that meet the criteria for habitat that is critical to threatened and endangered species. Therefore, the application fails to demonstrate compliance with criterion #4 of CON-7A.

The application and support documentation also assert that the proposed development complies with criterion #5 of CON-7A contending the wetlands on the site are highly disturbed or degraded. Specifically, the applicant's report titled "Evaluation of Policy CON-7A" states "the site no longer contains significant biological and hydrological functions justifying preservation." However, site assessments conducted by DERM staff in 2009, 2022, and 2024 revealed the wetland furrows contained hydrologic conditions capable of supporting native wetland plant species. The wetlands surrounding the ridge and furrow system were described as an intact wet prairie. Sightings of wetland-dependent fauna were documented, such as mosquito fish (*Gambusia holbrooki*), marsh rabbit (*Sylvilagus palustris*) scat and tracks, white-tail deer (*Odocoileus virginianus*) and apple snails (*Pomacea paludosa*), the main food source for the federally listed endangered species, Everglade snail kite (*Rostrhamus sociabilis*). Therefore, the application also fails to demonstrate compliance with criterion #5 of CON-7A.

CDMP Policy CON-7A also directs that, when reviewing applications that would result in impacts to Wetlands of Regional Significance, habitats critical to endangered or threatened species shall not be degraded or destroyed. Information provided in the Applicant's report titled

“Environmental Site Evaluation Listed Species and Wetland Conditions Assessment” by EAS Engineering, Inc., and dated December 10, 2024 indicates that the wetland furrows provide optimal foraging conditions for the threatened wood stork due to their longer inundation periods and ability to establish an aquatic prey base. The assessment of the endangered Everglade snail kite indicates the site contains areas that provide appropriate foraging habitat, particularly the wetland furrows. The application fails to demonstrate that the impacts of the proposed development will not degrade or destroy habitats critical to endangered or threatened species.

5. The Application Area being partly within a CDMP designated Urban Expansion Area (UEA), approximately 87 acres, may be considered for urban growth in the future when warranted, but the application proposes urban growth on the ±246.07 acres in a manner contrary to established County policy on how such growth is to occur. The UEAs represent areas that are projected for development beyond the year 2030 contingent upon those areas being brought into the UDB by CDMP amendment (CDMP, page I-89). The CDMP policies that guide the amendment process exist to ensure that expansion of the urban area occurs in a planned and coordinated manner. Specifically, applications proposing expansion of the UDB must demonstrate that a need exists for additional urban uses in accordance with CDMP Policy LU-8F and adhere to the limitations and criteria set forth in Policies LU-8G and LU-8H. By its proposed introduction of urban-type land uses into the Open Land category, the application would allow for such uses outside of the UDB without adherence to the policies that typically govern such amendments.

6. This application would require the extension of water and sewer utilities outside the Urban Development Boundary and the Urban Expansion Area, contrary to CDMP text and policy, in a manner that would create a long-term maintenance obligation for the County. The CDMP text (page I-84) recognizes that the availability of infrastructure and services can influence land markets and development activities and provides that the UDB serve as an envelope within which public expenditures for urban infrastructure will be confined. It further states that “in this regard the UDB serves as an urban services boundary in addition to a land use boundary”, underscoring the importance of the UDB amendment process discussed in Principal Reason No. 5 above. Further, CDMP Policy WS-1H states, in part, that “new potable water supply or wastewater collection lines should not be extended to provide service to land within areas designated Agriculture, Open Land, or Environmental Protection on the Land Use Plan map. New potable water or wastewater lines to serve land within these areas, or connections to existing lines should be approved or required only where the absence of the service would result in an imminent threat to public health or safety.” The policy further states that the use of on-site facilities should be given priority consideration. In order to address this issue, the application proposes a text change that would narrowly apply to development within the MIA Equipment and Supportive Services Area. Specifically, the application states “Notwithstanding the provisions of this Plan that prohibit the extension of infrastructure outside of the UDB, improvements within the MIA Equipment and Supportive Services Area shall be connected to public water and public sanitary sewer.” While the proposed text change would exempt the development from the CDMP policies that prohibit the extension of infrastructure outside of the UDB, it fails to address the concerns that underpin those policies. Specifically, the applicant has not adequately demonstrated that the use of on-site facilities is not feasible to serve the proposed development or that the proposed extension of central water and sewer service would not facilitate further development outside of the UDB or generate additional pressure to move the UDB. Required infrastructure serving development is typically built by the developer, and those portions within the public right-of-way, including public water and sanitary sewer mains are typically conveyed to Miami-Dade County to be maintained in perpetuity as public

infrastructure. For this application, this would require the County to operate and maintain any dedicated infrastructure that would be located outside the Urban Development Boundary.

7. The application as originally filed sought amendment of the Land Use Plan map to designate the site as Terminals, among other requests, and despite the changes made the application continues to propose development specific to the original application site and an additional parcel, is thereby reviewed against CDMP Land Use Element Policy LU-8E, and is found to not demonstrate full compliance with the policy criteria. Policy LU-8E requires LUP map amendment applications to consider factors such as: (i) the proposed amendment's ability to "[s]atisfy a deficiency in the Plan map to accommodate projected population or economic growth of the County;" (ii) whether the proposed amendment would "[e]nhance or impede provision of [public] services [or facilities] at or above adopted LOS Standards;" (iii) whether the proposed amendment would "[b]e compatible with abutting and nearby land uses"; (iv) whether the proposed amendment would "[e]nhance or degrade environmental or historical resources;" (v) whether the proposed amendment would "[e]nhance or degrade systems important to the County as a whole"; and (vi) whether the proposed amendment would "promote transit ridership and pedestrianism" pursuant to Objective LU-7 and associated policies. Each factor is discussed below:

- i. Need to Accommodate Population or Economic Growth:* As noted in Principal Reason No. 1 above, the application seeks to expand and relocate the Kelly Tractor Company operations to the application site, which could, but is not demonstrated to, accommodate economic growth. The proposed 2,703,400 square feet of development proposed to house equipment storage, fabrication, service and repair, employee training, parts and component sales, , administration offices and classrooms, limited commercial/retail and similar uses are analyzed as industrial uses given the nature of the proposed development. As discussed above and in the 'Supply and Demand Analysis section herein on page 30, Kelly Tractor Company owns a vacant ±9.43-acre parcel adjacent to its existing headquarter site that can accommodate expansion of the business. Furthermore, the application does not demonstrated a clear need to relocate the existing use outside the UDB at this time.
- ii. Public Facilities and Services:* *The application provides for access to the Application area through the construction of the northern two lanes of NW 6 Street, from NW 137 Avenue to theoretical NW 139 Avenue, which roadway segment is a 'Major Roadway' (three or more lanes) as depicted on the CDMP Adopted 2030 and 2040 Land Use Plan (LUP) map. The applicant proffered a Declaration of Restrictions (covenant) that, among other things, commits to provide access from NW 137 Avenue to the Property by way of NW 6th Street and has requested to amend the CDMP to include the road improvement in the Capital Improvements Element (CIE).*

However, the proposed development is projected to generate significant impacts to NW/SW 137 Avenue (north of SW 8 Street), also a 'Major Roadway' as depicted on the LUP map and the application does not address those impacts. Furthermore, NW/SW 137 Avenue from NW 6 Street to SW 8 Street is projected to operate in violation of its adopted level of service (LOS) standard and therefore any development, particularly existing development to be relocated outside the UDB is to ensure that adequate infrastructure is available or provided for the development (see Roadways analysis on page 54 herein). The projected failure of this NW/SW 137 Avenue segment is identified in the 2045 Long Term analysis in the Applicant's August 2023 'CDMP Amendment Traffic Impact Study', but the application does not address this violation in the roadway LOS standard.

The proposed “MIA Transportation and Infrastructure Support Services Area” text would allow the proposed development to be connected to water and sewer infrastructure and the applicant’s proffered covenant includes a commitment to connecting the water and sewer infrastructure. Required water and sewer infrastructure serving development is typically built by the developer, and those portions within the public right-of-way, including public water and sanitary sewer mains are ordinarily conveyed to Miami-Dade County to be maintained in perpetuity as public infrastructure. For this application, this would require the County to operate and maintain any dedicated infrastructure that would be located outside the Urban Development Boundary.

- iii. *Compatibility*: The proposed development is compatible with the Miami-Dade School Board transportation center and a radio broadcasting tower and antenna field facility east of the site. Further, the proposed development could be generally compatible with the abutting and adjacent vacant properties located outside of the UDB to the south and west.
- iv. *Environmental and Historical Resources*: Approval of the application may impact archaeological and environmental resources on the site, including threatened and endangered species as discussed in Principal Reason No. 4 above and as discussed below.

Archeological Resources: The application area, the site of the Applicant’s proposed “MIA Transportation and Infrastructure Support Services Area”, is within the eastern Everglades area, known to contain Everglades Tree Island sites, and includes a portion of the historically designated Leigh Archaeological Zone (southeastern most portion of Folio 30-3953-000-0130). A Cultural Resource Assessment Survey dated August 2023, confirmed the existence of Archaeological Site 8DA93 in the southeastern corner of the application area. A Certificate To Dig (CTD) permit and consultation with Miami-Dade Office of Historic Preservation (OHP) staff shall be required before any ground disturbing activities commence near the Leigh Archaeological Zone. The applicant’s proffered covenant commits to preserving and making no physical alteration to the Archaeological Site.

Wetlands: The application area lies within the North Trail Basin and contains wetlands including Wetlands of Regional Significance as depicted on Figure 14 of the CDMP Land Use Element, as discussed in Principal Reason No. 5 above. The application site contains approximately 162.19 acres of wetlands of which approximately 63 acres are preservation areas protected under covenants and associated with Class IV permit 2008-CLIV-PER-00056 (±40.3 acres of wetland agricultural furrows, ±10.8-acre bayhead, and ±12.3-acre prairie). The application area is part of a high functioning wetland ecosystem, as determined by DERM, and that the application has not demonstrated how it meets the criteria for development within Wetlands of Regional Significance.

Wetland areas in the North Trail Wetland Basin may be significant to Comprehensive Everglades Restoration Plan (CERP) efforts including the Biscayne Bay and Southern Everglades Ecosystem Restoration (BBSEER) project. Under BBSEER, a number of alternatives that would include CERP features in the area of the application are being evaluated due to the strategic location of these wetlands. CERP requires additional areas to store and distribute water to restore Biscayne Bay and its coastal wetlands, and these needs are a focus of the BBSEER study. The current round of BBSEER modeling includes use of the Pennsuco wetlands to the west of the application site as a water storage and conveyance feature. Since the modeling effort is not complete, the extent of any needed

wetland buffer areas to the east is not yet known. Therefore, the proposed development's potential impacts to the CERP BBSEER project cannot be determined at this time.

Land Use Element Policy LU-3J states that "Miami-Dade County continues to support the Comprehensive Everglades Restoration Plan (CERP), and related regional and local habitat restoration and preservation initiatives through its development review processes and long range land planning initiatives." In addition, Conservation, Aquifer Recharge and Drainage Element Policy CON-7J provides that "(i)n evaluating applications that will result in alterations or adverse impacts to wetlands Miami-Dade County shall consider the applications' consistency with Comprehensive Everglades Restoration Program (CERP) objectives. Applications that are found to be inconsistent with CERP objectives, projects or features shall be denied." Although the application site has not been formally identified as part of a CERP project, additional information is needed to determine the application's consistency with CERP-related policies.

Tree Resources: In addition to wetlands, the site of the proposed development also contains tree resources, that may include specimen trees (trees with a trunk diameter at breast height of 18 inches or greater) that are to be protected pursuant to section 24-49.2 of the Miami-Dade County Code. Any removal and/or relocation of tree resources that are subject to the Tree Preservation and Protection provisions of the Code require a Miami-Dade County Tree Permit.

Threatened and Endangered Species: The site of the applicant's proposed "MIA Transportation and Infrastructure Support Services Area" is located within the core foraging area of the federally threatened wood stork and lies just east of the location of long-term nesting areas for these species. The site is also within the consultation area for the U.S. Fish and Wildlife Service's consultation area for the endangered Everglade snail kite and the Florida bonneted bat, which may utilize the site for nesting, roosting, and foraging. While the application and supplemental information acknowledge the location of the Application area within Wetlands of Regional Significance and makes certain commitment to abide by certain permits, covenants and restrictions, it does not adequately address the potential impacts to threatened and endangered species, as discussed in Principal Reason No. 3 above.

- v. *Enhance or Degrade Countywide Systems:* As discussed in Principal Reason No. 7.ii above, the proposed in the application would generate traffic impacts to NW/SW 137 Avenue that are not mitigated for in the application and that roadway is projected to operate in violation of is adopted LOS standard.
- vi. *Transit Ridership and Pedestrianism:* The application and the proposed development does not directly support mass transit ridership and pedestrianism. The site of the proposed development is outside the UDB and would remain outside the UDB if the application is approved, and consequently, transit service will not be provided to the site. The general vicinity of the site is served by Metrobus Route 137 at 30 minutes peak hour (am/pm) headways with the nearest southbound bus stop located at SW 137 Avenue and SW 8 Street, approximately one mile away from the site, inside the UDB. It is noted that the existing Kelly Tractor site inside the UDB is adjacent to a bus stop served by Metrobus Route 87 with 30-minute peak hour headways.

However, it is also noted however that the proposed development could indirectly support transit ridership and pedestrianism through its location within the TIID and its ad valorem tax

revenue contributions to fund transit infrastructure as discussed in Principal Reason No. 3 above.


8. Statement A.6 of the CDMP's Statement of Legislative Intent contemplates instances where a choice between different priorities and provisions of the CDMP must be made for public health, safety and welfare. Accordingly, Statement A.6 notes, in part, "[t]he Board recognizes that a particular application may bring into conflict and necessitate a choice between, different goals, priorities, objectives, and provisions of the CDMP." The recommended transmittal of the application would allow time for this policy question to be fully explored and the merits of the application to be considered in relation to the environmental and traffic concerns, before final action is taken by the Board.

Hold The Line Veto Request-
CDMP20230013 Kelly Tractor
Appendix C

Mayor's Memo Supporting
CDMP20210006-Terra 137 March 10th 2023

Date: March 10, 2023

To: Honorable Chairman Oliver G. Gilbert, III
and Members, Board of County Commissioners

From: Daniella Levine Cava 
Mayor

Subject: Application No. CDMP20210006, Terra137, LLC, and Blue Heron 6137, LLC

Executive Summary

To continue building a thriving, resilient community and economy, we need smart planning that recognizes the unique needs of Miami-Dade's industries and residents. That includes creating adequate space for truck parking, which has posed a challenge with the continued growth of the logistics industry. Failure to provide sufficient space for truck parking has resulted in conflict in communities like the Redland – with community groups and farmers upset that their beloved agricultural lands were being turned into an industrial zone by trucks, and truckers unable to find space needed to do their jobs.

We have seen improvement in this issue as a result of ongoing enforcement of illegal truck parking operations and the expansion of legal truck parking areas. But we continue to hear valid concerns that the County offers insufficient outlets for truck parking in compliance with the law. It's only fair that as we continue to prioritize enforcement of illegal parking, we also take steps to ensure there is adequate space available for these activities and truckers can access the facilities they need.

After careful analysis, our professional planning staff endorses the Terra application in its new form. The revised application provides additional truck parking locations on land that is being designated as a Terminal without needing to move the Urban Development Boundary (UDB). This will provide much greater assurance that the property will be used for the intended purpose – to address the need for additional truck parking – given that moving the UDB would drive up the value of the land and make it more likely to be used for another, more intense activity, as detailed in this memo. The significantly revised application before the Board strikes a responsible balance to address a very real need in our community, help hardworking truckers with new opportunities to find legal parking, and ensure the continued growth of key industries.

Background

Illegal truck parking has been a longstanding challenge for our community, as I know well from my years serving as the Commissioner for District 8. As Commissioner, I pushed for common-sense reforms that strike a balance between residential life, the needs of the farming industry, and the needs of our community's truckers – who are on the frontlines of our county's robust logistics industry. As Mayor I supported legislation (Ordinance No. 21-59) prepared by our Regulatory and Economic Resources staff and prime sponsored by then-Chairman Diaz, along with co-sponsors Commissioner Cohen Higgins and Commissioner Souto – with the full support of farming interests after dozens of stakeholder meetings – provide our code enforcement operation with the tools they needed to restore tranquility to Redland and ensure agricultural lands remain productive farm operations. That legislation was accompanied by Ordinance No. 21-42, which expanded available locations for legal commercial vehicle parking.

But truck parking is an incredibly land intensive activity, and our present inventory still does not fully address the total trucking need. Importantly, none of our existing trucking areas provide adequate support services for long-haul truckers. The proposed application site is uniquely situated west of Miami International Airport, near a significant concentration of logistics developments and has the additional advantage of proximity to major trucking corridors.

Recommendation

The revised Terra CDMP application provides additional truck parking locations on land that is being designated as a Terminal, without moving the UDB. Designating the land as a Terminal – rather than moving the UDB – is key to ensuring the land will actually be used for the intended purpose, to help address the deficiency of truck parking facilities. Based on staff real estate analysis, expanding the UDB to include the applicants' site would substantially increase its value as an industrial development instead of truck parking. This is illustrated by the fact that although truck parking is allowed on virtually every industrial lot inside the UDB, the highest and best use of that land is clearly warehousing or other more lucrative logistics facilities – leading us to the current challenges we face with the availability of truck parking. Approving the application as amended and recommended by staff provides significantly greater assurance that the property will be for the intended purpose.

Other Concerns

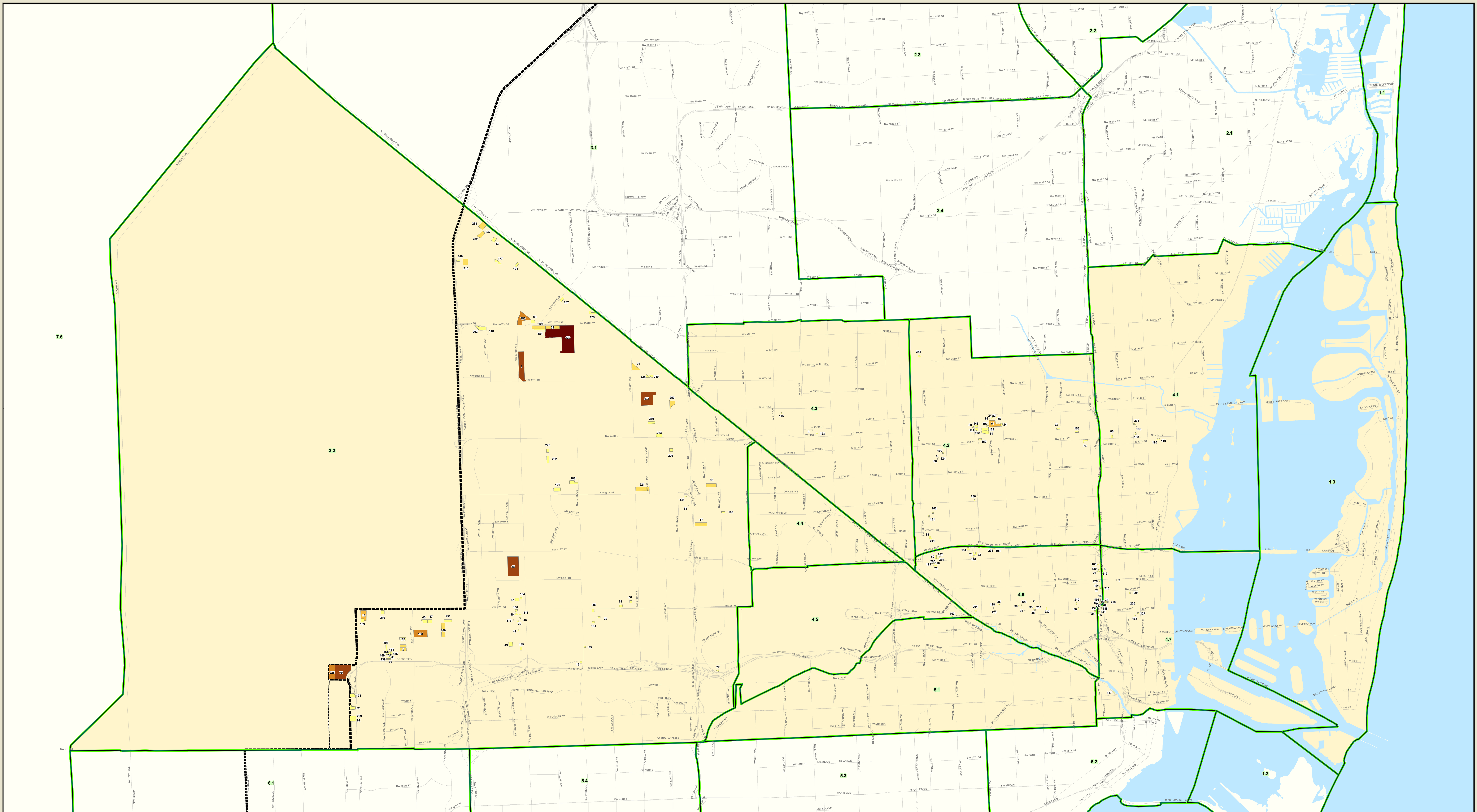
The application's potential impacts on our wetlands have also been an area of concern, and I'm grateful to the South Florida Water Management District (SFWMD) and the Florida Department of Environmental Protection for providing comments on the application. Although the SFWMD initially outlined concerns, the applicant addressed those in their revised application and SFWMD subsequently opined that they had no further comments. The application can be approved consistent with County policy regarding the Comprehensive Everglades Restoration Plan (CERP). I know you share my concern with wetland impacts and I am committed to ensuring that Miami-Dade continues to fully support the implementation of CERP. This application will be required to provide for wetlands mitigation – secured through a Division of Environmental Resources Management (DERM) Class IV permit, which may involve a quasi-judicial hearing before this Board. All such applications are expected to avoid and minimize impacts and ensure that applicants have taken care to address environmental concerns appropriately and adequately, and we will continue to carefully monitor this application as it goes through its remaining development approval processes.

I look forward to providing this needed facility to our trucking community, and I thank the applicant for working with County staff to find a responsible, balanced way to meet this critical need.

c: Geri Bonzon-Keenan, County Attorney
Gerald K. Sanchez, First Assistant County Attorney
Jess M. McCarty, Executive Assistant County Attorney
Office of the Mayor Senior Staff
Jennifer Moon, Chief, Office of Policy and Budgetary Affairs
Yinka Majekodunmi, Commission Auditor
Basia Pruna, Director, Clerk of the Board
Eugene Love, Agenda Coordinator

Hold The Line Veto Request-
CDMP20230013 Kelly Tractor
Appendix D

North Central Tier Vacant Industrial Parcels
As Of July 2025

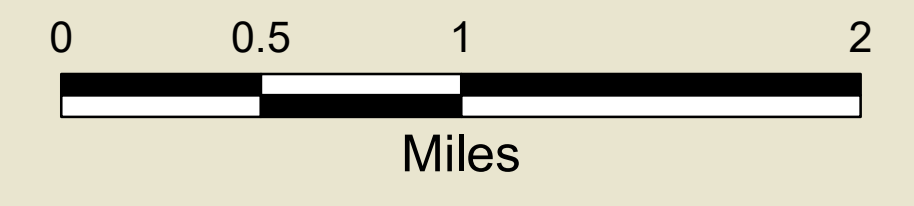


- Legend**
- NORTH-CENTRAL TIER
 - ACRES**
 - Less Than 5
 - 5.00 - 10.00
 - 10.01 - 15.00
 - 15.01 - 30.00
 - 30.01 - 50.00
 - 50.01 - 116.29
 - MINOR STATISTICAL AREA
 - 2030 URBAN DEVELOPMENT BOUNDARY
 - URBAN EXPANSION AREA BOUNDARY

VACANT INDUSTRIAL SITES

NORTH-CENTRAL TIER

MIAMI-DADE COUNTY



MAP ID	FOLIO	OWNER1	OWNER2	DOR	DOR DESCRIPTION	PARCEL GIS CALC AREA (ACRES)	SITE GIS CALC AREA (ACRES)	NUMBER OF FOLIOS PER SITE
1	2230050010260	F77 1 F77 2 & F77 3 LLC		4081	VACANT LAND - INDUSTRIAL : VACANT LAND	1.7		
1	2230050010420	F82 1 LLC		4081	VACANT LAND - INDUSTRIAL : VACANT LAND	17.8		
1	2230050010420	F82 1 LLC		4081	VACANT LAND - INDUSTRIAL : VACANT LAND	7.7		
1	2230050020020	F82 1 LLC		4081	VACANT LAND - INDUSTRIAL : VACANT LAND	1.7		
1	2230050020040	F82 1 LLC		4081	VACANT LAND - INDUSTRIAL : VACANT LAND	1.7	31.6	5
2	0131270390150	PERFECTO SMITH L RAQUEL SMITH LE		4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.1	0.1	1
4	3031160070620	CARMEN CERVANTES		4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.1	0.1	1
5	2539350020500	WESTERN MIAMI INVESTMENTS LLC		9981	ACREAGE NOT CLASSIFIED AG : VACANT LAND	0.3		
5	2539350020502	SWEETWATER LAND LLC		9981	ACREAGE NOT CLASSIFIED AG : VACANT LAND	0.5		
5	2539350020520	CARIBBEAN SUPER MARKET SA LLC		9981	ACREAGE NOT CLASSIFIED AG : VACANT LAND	0.6		
5	2539350020530	TRIPLE A 3 LLC		9966	ACREAGE NOT CLASSIFIED AG : EXTRA FEA OTHER THAN PA	0.9		
5	2539350020531	CARIBBEAN SUPER MARKET S A LLC		9981	ACREAGE NOT CLASSIFIED AG : VACANT LAND	0.6		
5	2539350020535	SWEETWATER LAND LLC		9981	ACREAGE NOT CLASSIFIED AG : VACANT LAND	0.4		
5	2539350020538	WESTERN MIAMI INVESTMENTS LLC		9981	ACREAGE NOT CLASSIFIED AG : VACANT LAND	0.3		
5	2539350020607	RALGO WESTDADE LLC		9981	ACREAGE NOT CLASSIFIED AG : VACANT LAND	0.1		
5	2539350020611	RALGO WESTDADE LLC		9966	ACREAGE NOT CLASSIFIED AG : EXTRA FEA OTHER THAN PA	1.8		
5	2539350020615	RALGO WESTDADE LLC		9981	ACREAGE NOT CLASSIFIED AG : VACANT LAND	0.2		
5	2539350020617	RALGO WESTDADE LLC		9981	ACREAGE NOT CLASSIFIED AG : VACANT LAND	0.8		
5	2539350020622	RALGO WESTDADE LLC		9981	ACREAGE NOT CLASSIFIED AG : VACANT LAND	0.8	7.4	12
7	0131250242820	29TH ST LAND HOLDING LLC		1081	VACANT LAND - COMMERCIAL : VACANT LAND	0.2	0.2	1
8	0131250260120	ELLER MEDIA COMPANY		4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.1	0.1	1
9	0431070060470	MIRANDA INVESTMENTS I LLC		4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.1	0.1	1
11	3031100740010	MIAMI DADE COUNTHCD		8080	VACANT GOVERNMENTAL : VACANT LAND - GOVERNMENTAL	0.8		
11	3031100740020	MIAMI DADE COUNTHCD		8080	VACANT GOVERNMENTAL : VACANT LAND - GOVERNMENTAL	2.8		
11	3031100740030	MIAMI DADE COUNTHCD		8080	VACANT GOVERNMENTAL : VACANT LAND - GOVERNMENTAL	2.7		
11	3031100740040	MIAMI DADE COUNTHCD		8080	VACANT GOVERNMENTAL : VACANT LAND - GOVERNMENTAL	1.9		
11	3031100740050	MIAMI-DADE COUNTHCD		8080	VACANT GOVERNMENTAL : VACANT LAND - GOVERNMENTAL	1.9		
11	3031100740060	MIAMI-DADE COUNTHCD		8080	VACANT GOVERNMENTAL : VACANT LAND - GOVERNMENTAL	0.5	10.6	6
12	3530320000123	EASTON REAL ESTATE HOLDINGS LLC		4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.8	0.8	1
16	0131250350330	ARMANDO LARGAESPADA		4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.1	0.1	1
17	3030230010360	POWER LOGISTICS OWNER LLC		2719	AUTOMOTIVE OR MARINE : AUTOMOTIVE OR MARINE	4.2		
17	3030230010362	POWER LOGISTICS OWNER LLC		4081	VACANT LAND - INDUSTRIAL : VACANT LAND	1.9		
17	3030230010363	POWER LOGISTICS OWNER LLC		4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.7		
17	3030230010364	POWER LOGISTICS OWNER LLC		4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.8	7.7	4
18	2539350100090	GOYA FOODS INC		4837	WAREHOUSE TERMINAL OR STG : WAREHOUSE OR STORAG	10.3	10.3	1
21	0131250470271	WOOD TRUSS OF MIAMI LLC		4066	VACANT LAND - INDUSTRIAL : EXTRA FEA OTHER THAN PARK	0.1		
21	0131250470380	WOOD TRUSS OF MIAMI LLC		4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.1		
21	0131250470390	WOOD TRUSS OF MIAMI LLC		4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.1	0.4	3
22	2530310011200	WEKU ENTERPRISES LLC		4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.5	0.5	1
23	3031110320110	1255 REAL ESTATE HOLDINGS LLC		4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.3		
23	3031110320120	1255 REAL ESTATE HOLDINGS LLC		4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.1		
23	3031110320130	1255 REAL ESTATE HOLDINGS LLC		4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.2		
23	3031110320140	GREEN GARDEN ORGANICS INC		4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.2		
23	3031110320160	GREEN GRDN ORGANICS INC		4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.2		
23	3031110320170	GREEN GARDEN ORGANICS INC		4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.1	1.0	6
24	3031100281880	STEPHEN MERUELO		4066	VACANT LAND - INDUSTRIAL : EXTRA FEA OTHER THAN PARK	0.9	0.9	1
25	0131270461020	OTERO HOLDINGS III LLC		4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.3	0.3	1
29	3530330150070	BATES PROPERTY MGMT		4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.7	0.7	1
30	0131270390550	JCVI CORP		4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.2		
30	0131270390560	JCVI CORP		4066	VACANT LAND - INDUSTRIAL : EXTRA FEA OTHER THAN PARK	0.1	0.3	2
32	2230050010170	F79 1 LLC		4081	VACANT LAND - INDUSTRIAL : VACANT LAND	8.7	8.8	1
33	0131270450280	1790 ALLAPATTAH LLC		4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.2		
33	0131270450290	1790 ALLAPATTAH LLC		4066	VACANT LAND - INDUSTRIAL : EXTRA FEA OTHER THAN PARK	0.1	0.3	2
34	0131250352910	BRAIT CO % SHLOMO BRAIT		4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.1		
34	0131250353020	MILANA HOLDINGS LLC		4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.1		
34	0131250353030	JACK SHLOMO BRAIT		4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.1		
34	0131250353040	BRAIT CO % SHLOMO BRAIT		4066	VACANT LAND - INDUSTRIAL : EXTRA FEA OTHER THAN PARK	0.1		
34	0131250353050	MILANA HOLDINGS LLC		4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.1		
34	0131250353060	MELANIE HOLDING&C/O MANAGEMENT INC		4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.1		
34	0131250353070	MELANIE HOLDING&C/O MANAGEMENT INC		4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.1	0.7	7
35	0131260170060	ZADOK REAL ESTATE HOLDINGS LLC		4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.4	0.4	1
38	0131270450320	JACQUES LEBAZ ALICE CAONES DE MIRANDA		4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.2	0.2	1
40	2530310010470	TRUCK DEPOT LLC		1713	OFFICE BUILDING - ONE STORY : OFFICE BUILDING	0.8		

40	2530310010500	TRUCK DEPOT LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.1	0.9	2
41	3031100531190	STEPHEN MERUELO	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.1		
41	3031100531200	STEPHEN MERUELO	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.1	0.2	2
42	2530310000230	DORAL LOT ONE LLC	9966	ACREAGE NOT CLASSIFIED AG : EXTRA FEA OTHER THAN PA	0.2	0.2	1
44	3031210110040	MKAB HOLDINGS INC	1081	VACANT LAND - COMMERCIAL : VACANT LAND	0.3		
44	3031210110100	MKAB HOLDINGS INC	0081	VACANT RESIDENTIAL : VACANT LAND	0.2		
44	3031210110110	MKAB HOLDINGS INC	1081	VACANT LAND - COMMERCIAL : VACANT LAND	0.2		
44	3031210110120	MKAB HOLDINGS INC	1081	VACANT LAND - COMMERCIAL : VACANT LAND	0.2		
44	3031210110130	MKAB HOLDINGS INC	1081	VACANT LAND - COMMERCIAL : VACANT LAND	0.2		
44	3031210110140	MKAB HOLDINGS INC	1081	VACANT LAND - COMMERCIAL : VACANT LAND	0.2	1.2	6
45	2539360030010	AMB CODINA BEACON C/O PROLOGIS TAX COORDINATOR	1713	OFFICE BUILDING - ONE STORY : OFFICE BUILDING	3.3	3.4	1
46	2530310010970	108 LAND HOLDINGS LLC	2865	PARKING LOT/MOBILE HOME PARK : PARKING LOT	0.3	0.3	1
47	2539360020040	PROLOGIS 2 LP C/O PROLOGIS	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	2.9	3.0	1
48	3530300000025	BRIDGE POINT DORAL 2700 LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	43.1	43.1	1
49	2530310160030	FLIGHTWAY TWELVE LLC	4066	VACANT LAND - INDUSTRIAL : EXTRA FEA OTHER THAN PARK	1.8		
49	2530310170010	FLIGHTWAY TWELVE LLC	4066	VACANT LAND - INDUSTRIAL : EXTRA FEA OTHER THAN PARK	1.7	3.5	2
50	3031090080070	MIAMI-DADE COUNTY MIAMI-DADE TRANSIT	8080	VACANT GOVERNMENTAL : VACANT LAND - GOVERNMENTAL	0.5	0.5	1
51	2539350040445	ALVA PROPERTY MANAGEMENT LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.8	0.9	1
52	3049030030012	MB SWEETWATER SITE LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	1.7		
52	3049030030014	MB SWEETWATER SITE LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.5		
52	3049030030015	MB SWEETWATER SITE LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	1.2		
52	3049030030019	MB SWEETWATER SITE LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.5	3.9	4
53	2220300060065	WRT WORLD ENTERPRISES INC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	3.1	3.1	1
55	3031100572050	MIAMI REALTY TEAM LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.2	0.2	1
56	3530280230130	VITEL MOBILE INC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	1.1	1.1	1
59	2539350040155	AJF REAL ESTATE LLC	4066	VACANT LAND - INDUSTRIAL : EXTRA FEA OTHER THAN PARK	0.7		
59	2539350040300	SYNERGY CONSULTING SCG2024 11 LAND TRUST	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.1	0.8	2
60	3031210650030	DL REAL ESTATE LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	1.2	1.2	1
62	0131250470150	665 NW 27 STREET REALTY LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.1	0.1	1
63	3530220010880	M AND R TWIN GROUP INC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.2	0.2	1
65	0131250350260	2003 NW 7 LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.1	0.1	1
66	2539350040490	SABERLO FAMILY LT PARTNERSHIP	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.5	0.5	1
68	3031160070660	RODRIGUEZ AND G INVESTMENTS LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.1	0.1	1
69	0131250352800	2081 NW 6TH PLACE LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.1	0.1	1
70	3039530000134	PROLOGIS EXCHANGE C/O PROLOGIS INC	9981	ACREAGE NOT CLASSIFIED AG : VACANT LAND	2.5		
70	3039530000145	BEACON VILLAGE L C/O PROLOGIS INC	9981	ACREAGE NOT CLASSIFIED AG : VACANT LAND	2.5		
70	3039530000146	BEACON VILLAGE L C/O PROLOGIS INC	9981	ACREAGE NOT CLASSIFIED AG : VACANT LAND	1.2		
70	3039530000147	PROLOGIS EXCHANGE C/O PROLOGIS INC	9981	ACREAGE NOT CLASSIFIED AG : VACANT LAND	1.3		
70	3039530000148	PROLOGIS EXCHANGE C/O PROLOGIS INC	9981	ACREAGE NOT CLASSIFIED AG : VACANT LAND	2.5		
70	3039530000154	PROLOGIS EXCHANGE C/O PROLOGIS INC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	2.1		
70	3039530000156	PROLOGIS EXCHANGE FL 2002 LLC	9981	ACREAGE NOT CLASSIFIED AG : VACANT LAND	2.5		
70	3039530000157	PROLOGIS EXCHANGE C/O PROLOGIS INC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	1.2		
70	3039530000158	SRM INVESTMENTS LLC	1066	VACANT LAND - COMMERCIAL : EXTRA FEA OTHER THAN PARK	1.4		
70	3039530000159	BEACON VILLAGE L C/O PROLOGIS INC	9981	ACREAGE NOT CLASSIFIED AG : VACANT LAND	2.5		
70	3039530000162	PROLOGIS EXCHANGE C/O PROLOGIS INC	9981	ACREAGE NOT CLASSIFIED AG : VACANT LAND	2.5		
70	3039530000163	PROLOGIS EXCHANGE C/O PROLOGIS INC	4066	VACANT LAND - INDUSTRIAL : EXTRA FEA OTHER THAN PARK	6.2		
70	3039530000164	PROLOGIS EXCHANGE C/O PROLOGIS INC	9981	ACREAGE NOT CLASSIFIED AG : VACANT LAND	3.8		
70	3039530000166	BEACON VILLAGE L C/O PROLOGIS INC	9981	ACREAGE NOT CLASSIFIED AG : VACANT LAND	0.5		
70	3039530000250	PROLOGIS EXCHANGE C/O PROLOGIS INC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	6.2	38.9	15
72	3031280140230	SELF STORAGE VENTURES MIAMI LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.1		
72	3031280140240	SELF STORAGE VENTURES MIAMI LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.3		
72	3031280140250	SELF STORAGE VENTURES MIAMI LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.2		
72	3031280140260	SELF STORAGE VENTURES MIAMI LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.1		
72	3031280140270	SELF STORAGE VENTURES MIAMI LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.1	0.9	5
73	3031210110070	2781 NW 37TH STREET LLC	4066	VACANT LAND - INDUSTRIAL : EXTRA FEA OTHER THAN PARK	0.2		
73	3031210110080	2781 NW 37TH STREET LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.2		
73	3031210110090	2781 NW 37TH STREET LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.4	0.7	3
74	3530280230050	MASH REAL ESTATE NV	6181	IMPROVED PASTURES : VACANT LAND	1.5	1.5	1
76	0131140190220	WLR PARTNERS LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.2		
76	0131140190230	WLR PARTNERS LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.1		
76	0131140190240	WLR PARTNERS LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.3		
76	0131140190250	WLR PARTNERS LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.2		
76	0131140190260	WLR PARTNERS LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.1		
76	0131140190270	WLR PARTNERS LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.2		
76	0131140190280	WLR PARTNERS LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.3		
76	0131140190450	WLR PARTNERS LLC	1081	VACANT LAND - COMMERCIAL : VACANT LAND	0.2	1.6	8

77	3030520020340	MILAM DAIRY 18 LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.5	0.5	1
79	0131250260230	3121 NW 7TH AVE LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.1		
79	0131250260260	3121 NW 7TH AVE LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.1		
79	0131250260270	3121 NW 7TH AVE LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.1		
79	0131250260280	3121 NW 7TH AVE LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.1		
79	0131250260290	3121 NW 7TH AVE LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.1		
79	0131250260300	3121 NW 7TH AVE LLC	4066	VACANT LAND - INDUSTRIAL : EXTRA FEA OTHER THAN PARK	0.1	0.5	6
80	0131260540120	TYG DEVELOPMENT LLC	4066	VACANT LAND - INDUSTRIAL : EXTRA FEA OTHER THAN PARK	0.2		
80	0131260540130	TYG DEVELOPMENT LLC	4066	VACANT LAND - INDUSTRIAL : EXTRA FEA OTHER THAN PARK	0.2	0.3	2
81	3031100730060	MIAMI-DADE COUNTOCED	8066	VACANT GOVERNMENTAL : EXTRA FEA OTHER THAN PARKIN	3.1	3.4	1
82	3031100531090	N R N PROP INC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.2		
82	3031100531210	N R N PROP INC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.1	0.2	2
84	3031210080050	JTT MARINE LLC	4066	VACANT LAND - INDUSTRIAL : EXTRA FEA OTHER THAN PARK	0.2		
84	3031210080060	JTT MARINE LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.2		
84	3031210080070	JTT MARINE LLC	4066	VACANT LAND - INDUSTRIAL : EXTRA FEA OTHER THAN PARK	0.2	0.6	3
85	0131120000200	LRMF LAND OWNER LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.3		
85	0131120000711	LRMF LAND OWNER LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.1		
85	0131120340160	LRMF LAND OWNER LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.3		
85	0131120340190	PALMETTO HOMES DEVELOPMENT GROUP INC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.1		
85	0131120340200	LRMF LAND OWNER LLC	4066	VACANT LAND - INDUSTRIAL : EXTRA FEA OTHER THAN PARK	0.1		
85	0131120340210	BRAIT SHLOMO & ZIPRIS ZEEV	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.2	1.1	6
86	2220320160040	116 WAY LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	1.1		
86	2220320160050	116 WAY LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	1.1	2.2	2
87	3530300030250	ILDA CORP	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	1.3		
87	3530300030260	ILDA CORP	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	1.1	2.4	2
88	3530330470010	CRAVINO ENTERPRISES INC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	1.3	1.3	1
91	2230030560030	NUSFC LLC C/O NEENAH ENTERPRISES INC	4066	VACANT LAND - INDUSTRIAL : EXTRA FEA OTHER THAN PARK	1.2		
91	2230030560040	U S HOLDINGS INC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	5.2	6.4	2
92	3049030030010	MACHADO FAMILY LTD PARTNERSHIP #3	6781	CHICKENS : VACANT LAND	2.9	3.7	1
93	3030140100321	B10 NW 74TH AVE C/O BLACKSTONE REAL ESTATE	2719	AUTOMOTIVE OR MARINE : AUTOMOTIVE OR MARINE	6.5	6.5	1
94	0131270430220	FLORIDA GIG PROPERTIES CORP	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.2	0.2	1
95	3530330090250	GATORLAND PROP LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.5	0.5	1
97	0131250352930	669 NW 22 STREET C/O M MANAGEMENT INC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.1		
97	0131250353140	669 NW 22 STREET C/O M MANAGEMENT INC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.1		
97	0131250353150	669 NW 22 STREET C/O M MANAGEMENT INC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.1		
97	0131250353160	669 NW 22 STREET C/O M MANAGEMENT INC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.1	0.4	4
98	3031100531170	STEPHEN MERUELO	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.1	0.1	1
100	3031160070160	MIA 3251 LLC	0101	RESIDENTIAL - SINGLE FAMILY : 1 UNIT	0.3		
100	3031160070170	MARCELO R CONCHA	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.1	0.4	2
101	2539350040150	LA STRADA HOLDINGS LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.2	0.2	1
102	3031210010050	BIG APPLE PROPERTIES INC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.1		
102	3031210010060	BIG APPLE PROPERTIES INC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.3	0.3	2
103	3031330134150	FOUR MERMAIDS SEAFOOD LLC	1081	VACANT LAND - COMMERCIAL : VACANT LAND	0.2		
103	3031330134160	ENNIS ONILDA GAR ENNIS ONILDA GARCIA REV TR	0101	RESIDENTIAL - SINGLE FAMILY : 1 UNIT	0.1	0.2	2
104	2220290300010	SMART INVESTMENTS OF OF MIAMI LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	1.8	1.8	1
106	2539350010010	DARLING INGREDIENTS INC	9966	ACREAGE NOT CLASSIFIED AG : EXTRA FEA OTHER THAN PA	2.0	2.0	1
107	2539350020300	0520 VL LLC	9981	ACREAGE NOT CLASSIFIED AG : VACANT LAND	0.6		
107	2539350020301	0520 VL LLC	9981	ACREAGE NOT CLASSIFIED AG : VACANT LAND	0.3		
107	2539350020303	ALP17TH LLC	9981	ACREAGE NOT CLASSIFIED AG : VACANT LAND	1.4		
107	2539350020314	ALP17TH LLC	9981	ACREAGE NOT CLASSIFIED AG : VACANT LAND	0.7		
107	2539350020320	ALP17TH LLC	9981	ACREAGE NOT CLASSIFIED AG : VACANT LAND	0.3		
107	2539350020322	ALP17TH LLC	9981	ACREAGE NOT CLASSIFIED AG : VACANT LAND	0.3	3.7	6
109	3030230370010	RD HEAVY EQUIPMENT INC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	1.1	1.1	1
111	2530310010740	R & G ENGINEERING INC	4066	VACANT LAND - INDUSTRIAL : EXTRA FEA OTHER THAN PARK	0.1		
111	2530310010750	R & G ENGINEERING INC	4066	VACANT LAND - INDUSTRIAL : EXTRA FEA OTHER THAN PARK	0.3	0.4	2
115	0430120000200	ANTONIO A & HENRIETTA R CIPRIANO	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.2	0.2	1
118	3031280140170	3543 NW 35 STREET LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.2		
118	3031280140180	JUAN DE DIOS PROP INC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.1	0.3	2
119	0132180151210	DESVAUX ACQUISIT C/O MICHAEL BEDKE	4066	VACANT LAND - INDUSTRIAL : EXTRA FEA OTHER THAN PARK	0.2		
119	0132180151220	DESVAUX ACQUISIT C/O MICHAEL BEDKE	4066	VACANT LAND - INDUSTRIAL : EXTRA FEA OTHER THAN PARK	0.2	0.4	2
120	0131250260160	PRIORITY HOLDINGS LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.1	0.1	1
121	0131250352710	2027 NW 6TH PLACE REALTY LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.1		
121	0131250352720	2027 NW 6TH PLACE REALTY LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.0	0.1	2
122	3031100730020	MIAMI-DADE COUNTOCED	8081	VACANT GOVERNMENTAL : VACANT LAND	0.9	0.9	1
123	0431070060410	HIALEAH 12TH ADDITION LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.3	0.3	1
126	0131270390500	JOSE A REY MARIELA ALCALA	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.2	0.2	1

127	0131360170020	VENTURESOME INVESTMENTS LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.3	0.3	1
128	0131270461940	CAWY BOTTLING CO INC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.2	0.2	1
129	3031100730040	MIAMI-DADE COUNTOCED	8080	VACANT GOVERNMENTAL : VACANT LAND - GOVERNMENTAL	1.7		
129	3031100730050	MIAMI-DADE COUNTOCED	8080	VACANT GOVERNMENTAL : VACANT LAND - GOVERNMENTAL	1.8	3.7	2
131	3031210000560	GREEN 36 LLC	2865	PARKING LOT/MOBILE HOME PARK : PARKING LOT	0.5	0.5	1
134	3031210290450	2900 NW 39 LLC C/O JADIAN IOS	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.8		
134	3031210290580	2900 NW 39 LLC C/O JADIAN IOS	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.2		
134	3031210290590	2900 NW 39 LLC C/O JADIAN IOS	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.1		
134	3031210290610	2900 NW 39 LLC C/O JADIAN IOS	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.1		
134	3031210290620	2900 NW 39 LLC C/O JADIAN IOS	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.2	1.5	5
135	2230050010010	F77 1 F77 2 & F77 3 LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	3.2	3.2	1
139	2230050010010	F77 1 F77 2 & F77 3 LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	97.3	98.4	1
140	2220300160520	ASIMEX INTERNATIONAL LLC	4066	VACANT LAND - INDUSTRIAL : EXTRA FEA OTHER THAN PARK	1.1	1.2	1
141	3530220010200	AIRPORT GARDENS I LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.3		
141	3530220010210	AIRPORT GARDENS II LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.1	0.4	2
143	3031100730010	MIAMI-DADE COUNTOCED	8066	VACANT GOVERNMENTAL : EXTRA FEA OTHER THAN PARKIN	1.2	1.2	1
147	0102000104010	SO BELL TEL & TEL TAX ADM OFFICE	4066	VACANT LAND - INDUSTRIAL : EXTRA FEA OTHER THAN PARK	0.1		
147	0102010001020	P & L TOWING & TRANSPORTATION INC	4066	VACANT LAND - INDUSTRIAL : EXTRA FEA OTHER THAN PARK	0.4	0.5	2
148	3030060060121	FLAGLER BUILDING C/O AMBROSE PROPERTY GROUP LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	1.5	1.6	1
149	2530310000641	DAJOLEY PROPERTIES INC	1081	VACANT LAND - COMMERCIAL : VACANT LAND	0.4		
149	2530310000642	DAJOLEY PROPERTIES INC	1081	VACANT LAND - COMMERCIAL : VACANT LAND	0.6	1.0	2
153	2220320040140	SECTION 32 PROPE ASSOCIATION INC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	17.5	17.5	1
155	2539350040151	LA STRADA HOLDINGS LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.5	0.5	1
156	3031110354020	940 NW 73 STREET LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.3		
156	3031110354060	960 NW 73 STREET LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.3		
156	3031110354070	958 NW 73 STREET LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.4	1.0	3
157	0131250353170	DELORES C VOLPE DELORES C VOLPE REVOCABLE TRUST	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.1	0.1	1
158	2539360000030	F99 1 LLC	6181	IMPROVED PASTURES : VACANT LAND	19.2	19.3	1
159	3031100610022	VM INVESTMENTS CAPITAL LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	1.0	1.0	1
160	2539360000013	A-1 INVESTMENT GI% ALBERTO TAMAYO	6181	IMPROVED PASTURES : VACANT LAND	10.0	10.0	1
163	0131260080310	PUMO FAMILY LTD	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.2		
163	0131260080320	MARTIN PAUL VAZQUEZ	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.1	0.2	2
164	3530300380010	TAMPA DC LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.8	0.8	1
165	0131250480520	1901 NW 1ST AVENI C/O M MANAGEMENT	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.1		
165	0131250480540	1901 NW 1ST AVENI C/O M MANAGEMENT	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.1	0.2	2
166	2530310010260	HARRAKA BUILDING LLC	4066	VACANT LAND - INDUSTRIAL : EXTRA FEA OTHER THAN PARK	0.1		
166	2530310010270	HARRAKA BUILDING LLC	4066	VACANT LAND - INDUSTRIAL : EXTRA FEA OTHER THAN PARK	0.1		
166	2530310010280	HARRAKA BUILDING LLC	4066	VACANT LAND - INDUSTRIAL : EXTRA FEA OTHER THAN PARK	0.2		
166	2530310010290	HARRAKA BUILDING LLC	1081	VACANT LAND - COMMERCIAL : VACANT LAND	0.2		
166	2530310010300	HARRAKA BUILDING LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.2		
166	2530310010310	HARRAKA BUILDING LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.2	1.0	6
169	2539350040250	ALJEN INVESTMENTS LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.5	0.5	1
170	0131270460380	CAWY BOTTLING COMPANY INC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.2	0.2	1
171	3530170080010	HOME AND LAND INC	9751	PVT PARK -REC AREA -ROADWAY : COMMON AREA	1.3		
171	3530170080020	MDLLN LLC	9751	PVT PARK -REC AREA -ROADWAY : COMMON AREA	1.3		
171	3530170090010	DORAL UNITY HOLD RONDELIA MANAGEMENT LLC	9751	PVT PARK -REC AREA -ROADWAY : COMMON AREA	1.1		
171	3530170090020	GAROP DEVELOPERS INC	9751	PVT PARK -REC AREA -ROADWAY : COMMON AREA	1.1	4.9	4
173	2220330370010	EDWARD J DAVIES TR	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	1.5		
173	2220330370030	INTERNATIONAL PA TRADER USA INC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	1.0	2.6	2
175	0131250242400	TTHXVII 654 656 AP LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.2		
175	0131250242410	TTHXVII 654 656 AP LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.2	0.3	2
176	2530310011350	ANA QUINONES CO 10860 NW 22 ST TR	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.2	0.2	1
177	2220300160250	TG PROPERTIES GROUP LLC	2865	PARKING LOT/MOBILE HOME PARK : PARKING LOT	1.4		
177	2220300160260	JGR 10941 PROPERTY LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	1.2	2.7	2
178	3039530000152	CARADEL VENTURE WALTER LISTA &W MARTA	9981	ACREAGE NOT CLASSIFIED AG : VACANT LAND	3.3		
178	3039530000165	YARITZA GARCIA	9981	ACREAGE NOT CLASSIFIED AG : VACANT LAND	0.3	3.6	2
181	3530330410010	MAHUDI INTERNATIONAL CORP	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.7	0.7	1
182	0131120690200	TFC LITTLE RIVER LLC	4066	VACANT LAND - INDUSTRIAL : EXTRA FEA OTHER THAN PARK	0.6	0.6	1
185	2539350040100	13200 WEST DADE LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.9	0.9	1
186	3530170010532	VALERIE CHANG	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	1.1		
186	3530170010533	VALERIE CHANG	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	1.2		
186	3530170010534	VALERIE CHANG	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	1.2		
186	3530170010535	VALERIE CHANG	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	1.1	4.6	4
188	0131250352740	PASCAL S LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.1		
188	0131250352760	2071 NW 6 PLACE R C/O LAW OFFICE OF FRAN M PARKER	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.1	0.1	2
189	2539350100080	GOYA FOODS INC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	1.9	1.9	1

190	0132180151170	COLLINS FISH & SEAFOOD INC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.2		
190	0132180151180	NEAL 720 LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.2	0.3	2
191	0131250350770	669 NW 22 STREET C/O M MANAGEMENT INC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.2	0.2	1
193	3031280140140	JOSE L RODRIGUEZ JNR REVOCABLE LIVING TRUST	2865	PARKING LOT/MOBILE HOME PARK : PARKING LOT	0.2		
193	3031280140150	JOSE L RODRIGUEZ JNR REVOCABLE LIVING TRUST	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.2	0.3	2
195	0131120630141	FLP LITTLE RIVER LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.1	0.1	1
196	3031210110250	2757 NW 36TH ST LIC/O TRACY SEIDLE	2865	PARKING LOT/MOBILE HOME PARK : PARKING LOT	0.2		
196	3031210110260	2757 NW 36TH ST LIC/O TRACY SEIDLE	2865	PARKING LOT/MOBILE HOME PARK : PARKING LOT	0.2	0.4	2
197	3031100290050	MIAMI-DADE COUNTOCED	8080	VACANT GOVERNMENTAL : VACANT LAND - GOVERNMENTAL	0.4	0.4	1
198	2230050010180	F86 1 LLC & F90 1 LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	6.9		
198	2230050010700	F86-1 & F90-1 LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	1.5	8.4	2
199	3031220082180	ROZZIE FRANKLIN III	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.2	0.2	1
201	0131250370160	24TH STREET WYNWOOD LLC	1081	VACANT LAND - COMMERCIAL : VACANT LAND	0.2		
201	0131250370170	24TH STREET WYNWOOD LLC	1081	VACANT LAND - COMMERCIAL : VACANT LAND	0.2	0.3	2
202	3030060060110	FLAGLER BUILDING C/O AMBROSE PROPERTY GROUP LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	3.5		
202	3030060060120	FLAGLER BUILDING C/O AMBROSE PROPERTY GROUP LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	1.3	4.8	2
204	3031280170620	2780 NW 21 LLC	4066	VACANT LAND - INDUSTRIAL : EXTRA FEA OTHER THAN PARK	0.6		
204	3031280170630	2780 NW 21 LLC	0081	VACANT RESIDENTIAL : VACANT LAND	0.1	0.7	2
205	3031280140160	LARUSSO INVESTMENTS LLC	4066	VACANT LAND - INDUSTRIAL : EXTRA FEA OTHER THAN PARK	0.3	0.3	1
209	3049030030018	VENCER INVESTMENTS GROUP LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	2.5	2.5	1
210	2539350080020	FLORIDA POWER & ATTN PROPERTY TAX DEPT	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	2.3	2.5	1
212	0131260530230	TYG DEVELOPMENT LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.5	0.5	1
213	2220300160550	PINETREE LOGISTICS OWNER LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	6.0	6.0	1
215	0131250470400	WOOD TRUSS OF MIAMI LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.1	0.1	1
217	0131250352410	2177 NW 6 PL LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.0		
217	0131250352420	2177 NW 6 PL LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.1		
217	0131250352430	2177 NW 6 PL LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.1		
217	0131250352440	2177 NW 6 PL LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.1		
217	0131250352450	CARMEN MOLINA LYDIA MEDINA	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.0	0.3	5
218	0131250353000	MILANA HOLDINGS C/O M MANAGEMENT INC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.1	0.1	1
219	0131250260320	3121 NW 7TH AVE LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.1		
219	0131250260340	3121 NW 7TH AVE LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.1	0.1	2
220	0131250520020	2060 INVESTMENT CORPORATION	1081	VACANT LAND - COMMERCIAL : VACANT LAND	0.1	0.1	1
221	3030150010410	KELLY TRACTOR CO	2865	PARKING LOT/MOBILE HOME PARK : PARKING LOT	9.6	9.6	1
223	2230100080310	GAMMA DELTA CORP	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	1.3		
223	2230100080320	GAMMA DELTA CORP	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	1.3		
223	2230100080330	GAMMA DELTA CORP	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	1.3	4.0	3
224	3031160070631	MDCG PROPERTIES LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.1	0.1	1
225	3039530000136	PROLOGIS EXCHAN C/O PROLOGIS INC	9981	ACREAGE NOT CLASSIFIED AG : VACANT LAND	3.1		
225	3039530000137	PROLOGIS EXCHAN C/O PROLOGIS INC	9981	ACREAGE NOT CLASSIFIED AG : VACANT LAND	13.1	16.2	2
229	2230150010161	SKY PROPERTY INVESTMENTS LLC	2865	PARKING LOT/MOBILE HOME PARK : PARKING LOT	2.0	2.0	1
230	3031160096170	2747 INVEST LLC	1081	VACANT LAND - COMMERCIAL : VACANT LAND	0.1		
230	3031160096180	2747 INVEST LLC	1081	VACANT LAND - COMMERCIAL : VACANT LAND	0.1		
230	3031160096190	2747 INVEST LLC	1081	VACANT LAND - COMMERCIAL : VACANT LAND	0.1	0.2	3
231	3031220190170	ROZZIE FRANKLIN III	4066	VACANT LAND - INDUSTRIAL : EXTRA FEA OTHER THAN PARK	0.2	0.2	1
232	0131260210190	CEMEX CONSTRUC FLORIDA LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.3		
232	0131260210390	CEMEX CONSTRUC FLORIDA LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.1		
232	0131260210410	CEMEX CONSTRUC FLORIDA LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.2	0.6	3
233	0131270450340	NAVA GROUP LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.2	0.2	1
234	0131250350210	ALLAPATTAH EAST LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.1		
234	0131250350220	ALLAPATTAH EAST LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.2	0.3	2
235	0131120690010	WILL NOT SELL LLC	4066	VACANT LAND - INDUSTRIAL : EXTRA FEA OTHER THAN PARK	0.3		
235	0131120690060	WILL NOT SELL LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.2	0.4	2
239	2539350040470	HOLMES AVE AND E LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.4	0.4	1
241	3031210080080	4301 NW 36 AVE LLC	2865	PARKING LOT/MOBILE HOME PARK : PARKING LOT	0.3		
241	3031210080090	CLARK CRAFTSMENS GRDN PARKING LLC	2865	PARKING LOT/MOBILE HOME PARK : PARKING LOT	0.3	0.6	2
247	2220300060011	C & S REAL ESTATE DEVELOPMENT	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.1	0.1	1
248	2230030010510	9091 INVESTMENTS LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	1.3	1.4	1
249	2230030010505	DEVELOPERS UNLIMITED INC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	1.4	1.4	1
250	2230100080130	GAMMA DELTA CORP	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	5.7	5.7	1
251	2539360050010	AMB CODINA BEAC C/O PROLOGIS TAX COORDINATOR	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	3.8	3.8	1
252	3530170010220	FPM DORAL LLC	9981	ACREAGE NOT CLASSIFIED AG : VACANT LAND	1.8		
252	3530170010230	FPM DORAL LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	1.8	3.6	2
260	2230100080030	7980 HOLDINGS LLC	2865	PARKING LOT/MOBILE HOME PARK : PARKING LOT	3.3	3.3	1
261	3031210360690	PELMENI LLC	4066	VACANT LAND - INDUSTRIAL : EXTRA FEA OTHER THAN PARK	0.4	0.4	1
262	3031210630010	MAESTRE CONSTRUCTION INC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	0.2	0.2	1

267	2220320040240	LADOAN PROPERTIES III LLLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	1.9	1.9	1
271	2230100000020	FR FIRST PARK MIAMI VI LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	11.6		
271	2230100000170	FR FIRST PARK MIAMI V LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	21.5	33.2	2
274	3031040000085	RAIL TRACKS LLC	1081	VACANT LAND - COMMERCIAL : VACANT LAND	0.8	0.8	1
275	3530170010200	RENEGADE AT DORAL LLC	9981	ACREAGE NOT CLASSIFIED AG : VACANT LAND	1.8	1.9	1
282	2220300010320	RAVA GROUP PROPERTIES III LLC	4081	VACANT LAND - INDUSTRIAL : VACANT LAND	5.0	5.0	1
283	2220300110010	SPG 10900 NW 138TH ST LLC	4066	VACANT LAND - INDUSTRIAL : EXTRA FEA OTHER THAN PARK	6.9	6.9	1

Hold The Line Veto Request-
CDMP20230013 Kelly Tractor
Appendix E

Kelly Permitting & Enforcement Timeline

Kelly Tractor Property Permitting and Regulatory Actions Timeline

1984 - subject property was sold from Dade Title Corporation to Osprey Services Inc. (general warranty deed). Patrick Kelly, current owner and president of Kelly Tractor held Secretary position at Osprey Services Inc.;

1984 - Osprey Services Inc. successfully apply to Dade County Zoning Appeals Board requesting to permit the growing of fruit trees and row crops in the GU zone as would be permitted in the AU zone;

1985 (May) - Osprey Services Inc obtains a [Class IV permit \(CC 898; 3-54S-39E\)](#) for agricultural rockplowing of **240ac of wetlands** (total area of the parcel) - this permit is valid from May, 1985 - May, 1988;

1985 (Dec) - site inspection by DERM reveals unpermitted illegal dumping and wetland filling. Aerial photographs show illegal solid waste (construction) dumping on multiple parcels surrounding the property including property in question between 1983-1985;

1986 (Oct) - Inspector observes unpermitted limerock filling on subject property. Owners state they were not aware that additional Class IV permit is required to fill tracks left behind by agricultural equipment;

1987 (Nov) - [County DERM brings a lawsuit against Osprey Services Inc. and several other defendants](#) over continued failure to clean up solid waste left by illegal dumping of construction materials (which occurred prior to Osprey Services purchasing the parcel, but it was still Osprey's responsibility to remove that waste. Patrick Kelly is not personally named in the lawsuit);

1988 - case is settled, Osprey Services committed to cleaning up the waste, and were subjected to civil fines. **Notably, Osprey's share of administrative costs + civil penalties (\$3,400) were covered by a check from Kelly Tractor Co.**

1988 - Osprey Services Inc. receives the approval for a [Class IV permit \(FW88-34\)](#) to fill areas damaged by heavy agricultural equipment. This permit represented an after-the-fact approval for filling of 0.5 acres of freshwater wetlands in the North Trail Basin for agriculture;

1988 (July) - DERM makes a site inspection recording that all solid waste had been removed and Osprey Services Inc. were praised for an exemplary cleanup and the case was closed. The image below was taken on July 19, 1988 and shows the state of the portion of the property where the clean-up and rehabilitation from demolition waste and illegal dumping was required to be performed.



Image shows state of the portion of the property in July, 1988.

1991 - Quitclaim Deed was executed by Osprey Services Inc. transferring ownership to Kelly Tractor;

1997 - DERM made final inspection of the site associated with the Class IV permit issued for filling of 0.5-ac on the property, and owners were found to be in compliance;

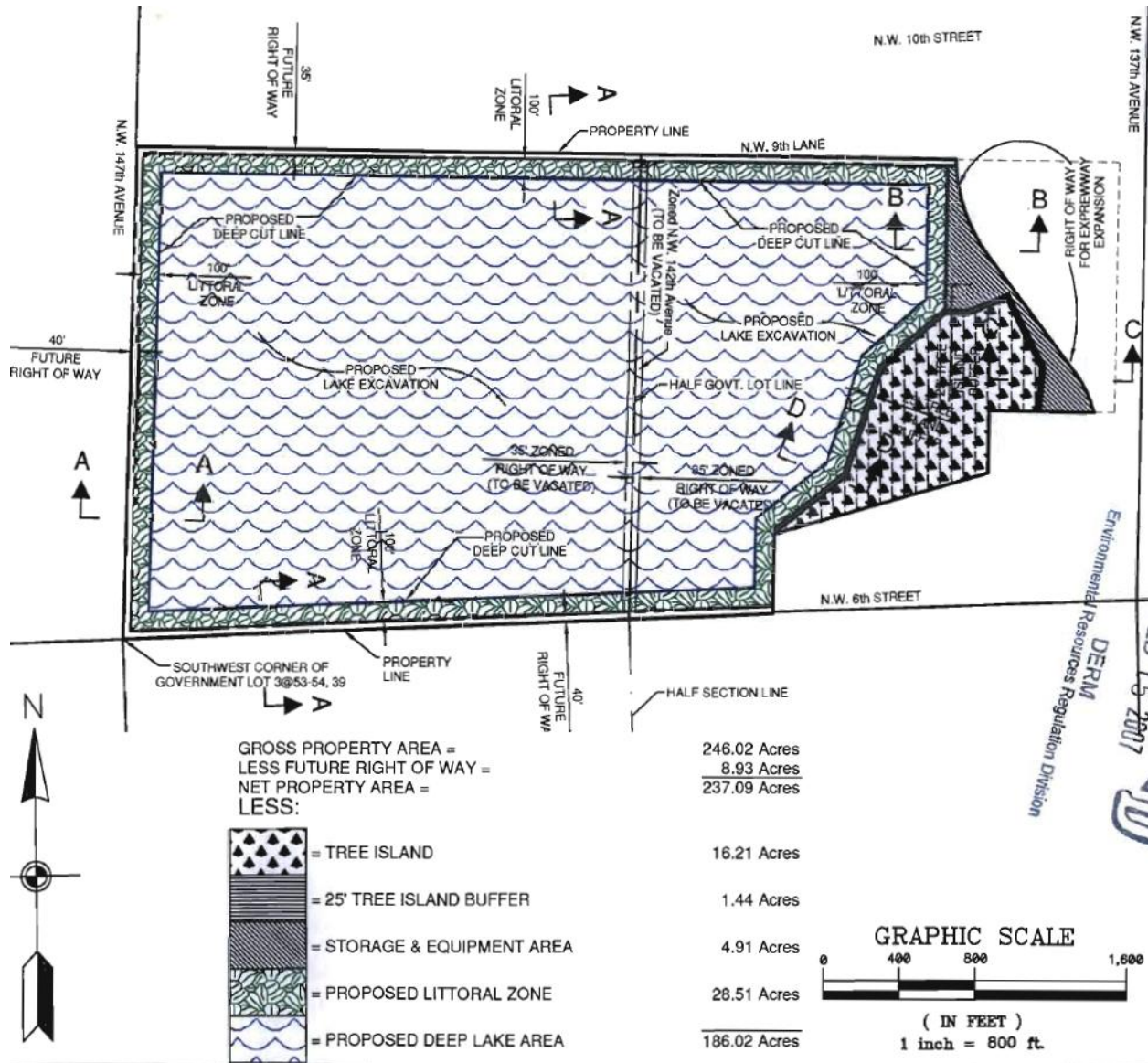
2005 - Kelly tractor clear and fill ~100ac of wetlands, which was flagged by DERM and revealed during the Dec 6, 2005 site inspection. DERM state that based on aerial photographs this work was performed without a Class IV Permit, [Notice of Violation and Orders to Cease and Desist are issued.](#)

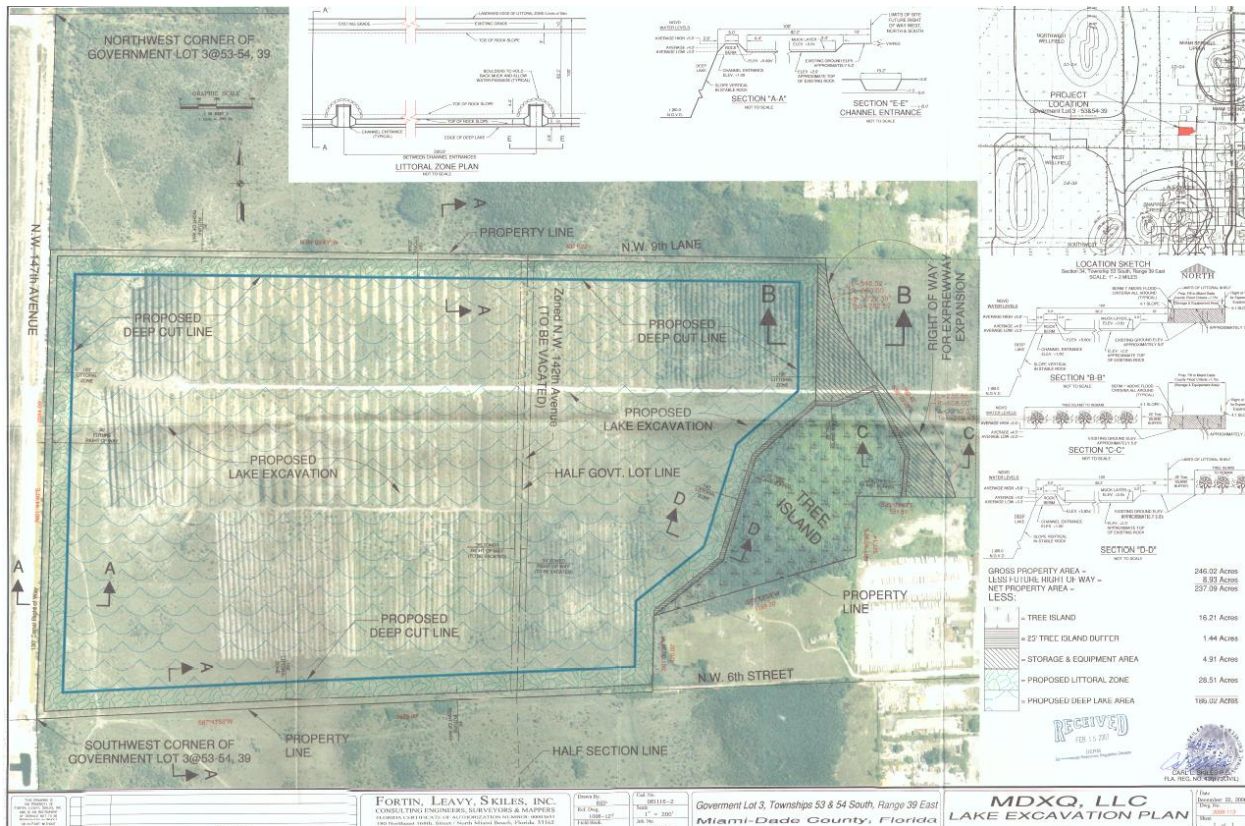
2006 (Mar) - DERM's review of historical aerial photographs reveal "longstanding, ongoing and unpermitted work in wetlands, including bayhead hammock" and continued permitting violations after the Dec 6, 2005 site inspection and issued violation order; DERM issue Kelly Tractor with **final** [Notice and Orders to Cease and Correct Violations.](#)

2006 (July 31) - Quitclaim Deed was executed by Kelly Tractor to MDXQ LLC, in which Patrick Kelly is listed as member of MDXQ LLC.;

2007 - Kelly Tractor attempt to obtain an after-the-fact Class IV Permit (FW 06-111, changed to FW 08-056 in Jan of 2009 due to changes to scope of work) for excavation of **186.02 ac** (later changed to **215.29 ac**) of wetlands for rock mining/quarrying (deep lake, see sketch below) in an attempt to resolve the permitting violations. In the course of the application process (based on the correspondence between Applicant and DERM) Applicant representatives continuously slow down the process, fail to provide appropriate documentation, and disregard Dept's various arguments and concerns (including any evidence DERM bring forward to prove permitting violations from 1990-onwards, after the Class IV Permit expired); after-the-fact permit

application is never completed, and permit was never obtained, despite several extensions. DERM also inform the Applicant that any unpermitted activity in the wetlands needs to be mitigated for, which Applicant representatives also push back on. In letter dated Dec 11, 2007 DERM advise the Applicant that permit application would become inactive on June 25, 2008 and continued failure to resolve environmental violations led Miami-Dade County to direct an Assistant Court Attorney of the 11th Circuit Court to bring another lawsuit against the property owners (Kelly Tractor and MDXQ LLC).





2008 (Nov, 4) - [Miami Dade County files a lawsuit against Kelly Tractor and MDXQ LLC.](#)

2008 (Dec, 4) - To facilitate resolution of the enforcement action Applicant submitted request for a revised Class IV after-the-fact permit application (FW 08-056).

2009 (Aug) - Wetland Resources Section of [DERM](#) conducted a [biological assessment](#) of the subject property and found that the property contains ~82.0-ac of permitted ag (~41-ac still retaining wetland function classifiable as a wet prairie), **~79.8-ac on unpermitted ag** (rows and furrows associated with unauthorized expansion) and ~83.2-ac of intact prairie and tree island. DERM note that the entirety of the property consists of ~245-ac of historical wet prairie wetland, with majority having been impacted by permitted and unpermitted ag activities, specifically row and furrow tree farming. Documents indicate that to offset the proposed wetland impacts to the 103-ac wetland site the applicant offered purchasing credits at the FPL Everglades Mitigation Bank.

2010 (Mar) - Applicant submits [UMAM analysis](#) to determine the amount of offsite mitigation required, requested by DERM; these substantially vary from DERM's assessment.

2010 - 2011 - DERM and Applicant are not getting any closer to resolution of issues raised in the Notice of Violations which precipitated the subsequent lawsuit. [DERM](#) and [Applicant](#) representatives exchanged letters outlining their complaints/concerns.

2012 (July, 17) - Application for the after-the-fact Class IV Permit is finally complete and Class IV Permit ([2008-CLIV-PER-00056](#)) is issued.

2012 (July, 2023) - Miami Dade County voluntarily dismisses the lawsuit filed in 2008, as Applicants resolve Notice of Violations issue by obtaining an appropriate Class IV Permit.

2015 (Aug) - Applicants [request an extension of the Class IV Permit](#) set to expire on Sep 13, 2015 to Sep 13, 2020. The [extension is granted](#) by DERM.