

SOUTH MIAMI DADE WATERSHED STUDY ADVISORY COMMITTEE

**February 23, 2006 Meeting #42
John D. Campbell Agricultural Center
Homestead, Florida**

REPORT OF PROCEEDINGS

WELCOME/CHAIR ANNOUNCEMENTS

The meeting was held at the John D. Campbell Agricultural Center in Homestead, Florida.

Roger Carlton, Chair, welcomed everyone.

Members present:

Roger Carlton, Chair
Ivonne Alexander, Miami Dade AgriCouncil
Richard Alger, South Florida Potato Growers Exchange
Humberto Alonso, South Florida Water Management District*
Subrata Basu, Miami Dade Planning and Zoning*
Gerald Case, Florida Lime and Avocado Committees
Amy Condon, At-Large Member
Guillermina Damas, At-Large Member
Carlos Espinosa, Miami-Dade DERM*
Jeffrey Flanagan, Chamber South
John Fredrick, Dade County Farm Bureau
Dick Frost, Tropical Audubon Society
Jamie Furgang, National Audubon Society (prospective member)
Robert Johnson, Everglades National Park
Louise King, Redland Citizen's Association
Mark Lewis, Biscayne National Park
William Losner, Greater Homestead/Florida City Chamber of Commerce
Carter McDowell, Building Industry Representative
Reed Olszack, Miami-Dade Agricultural Practices Board
Mark Oncavage, Sierra Club
Lawrence Percival, Kendall Federation of Homeowner Associations
Armando Perez, Florida Engineering Society
Bonnie Roddenberry, Sunny South Acres Homeowner's Association
Jorge Rodriguez, Miami Dade Water Department*
Mike Shehadeh, City of Homestead
Jane Spurling, Florida Nurserymen, Grower's and Landscape Association
Charles Thibos, Tropical Everglades Visitor Association
Julia Trevarthen, South Florida Regional Planning Council

*Non-voting member

There were 14 Observers.

AGENDA REVIEW/GUIDELINES

Janice Fleischer, Facilitator, reviewed the Agenda for the day (Exhibit A).

All Reports of Proceedings of the Committee, Discussion Guidelines and Committee related information, can be found either on the Study website at SFRPC website at www.southmiamidadewatershedstudy.com or at <http://www.sfrpc.com/institute/watershed.htm>.

PROJECT MANAGER'S REPORT

Bob Daniels, SFRPC, delivered his Project Manager's Report. (Exhibit B)

- Two public meetings were held by the Consultants on February 21 and 22
 - The TRC met on February 14: it was their final meeting
 - They were very supportive of the work
 - They are not an "approving" group; they were advisory and want that to be clear
- There is \$1.3 million let to go on the contract; we are at the 50% point in expenditures

PUBLIC COMMENT

Public comment was invited. Seven individuals spoke:

- Ed Swakon, Consultant
- Steve Torcise, President, Atlantic Civil
- Dewey Steel, Resident, Tropical fruit grower
- Don Pybas
- Rod Jude, Sierra Club
- Colleen Boggs
- Wes Skiles, Karst Productions

Members of the public are strongly encouraged to submit their comments in writing on the comment cards provided at each meeting or email the Facilitator; Janice Fleischer (janice@flashresolutions.com) within the first week following the meeting and those comments will be included in the Report.

CONSULTANT PRESENTATION ON NEWEST MAP VERSION

Michael Davis, V.P., Keith and Schnars, delivered a presentation on the newest version of the map. (Exhibit C)

Mr. Davis demonstrated how each version of the map was revised pursuant to the input of the Committee members. He explained that the public meetings were held for the purpose of obtaining public input, not to reveal a final map. This is not a FINAL scenario only a DRAFT scenario.

An extensive discussion took place following the presentation. Members made the following comments:

1. We need a clear definition of what is 'rural'

2. The level of landscaping of new development needs to be discussed as part of implementation strategies.
3. On the map we need to know where the charrettes exist
4. The Committee needs charrette background documentation
 - a. **Committee will be provided a list of charrette areas and a map of where they are**
5. Wetlands need to be established where it has been shown they will be effective for water quality and flooding.
6. Keep wetlands away from Mt. Trashmore
7. Put well-field study areas back on map (these are not a well-field *protection* area)
8. Map will coincide in Watershed boundaries with CERP map boundaries
9. Base Reuse A? C? – this is an opportunity to go back and have HAFB as a joint use facility
10. We have not addressed water supply-we should identify places where de-salinization plants would go.
 - a. **County has hired a consultant to study and report on this**
11. This new study (being done by Arsenio Melian) should be interfaced with our work: “Reuse Feasibility and Alternative Water Supply Plan Study” very preliminary study
 - a. **after this preliminary study a consultant will be hired to prepare a detailed study in the next 6-9 months**
 - b. This study will be appropriate
12. Move red dotted development area presently located outside UDB on the map to between the 2 transportation corridors (Redland area)-put population between the two N/S running corridors
13. The actual siting of wetlands to west will not be done in this study-just a designation of approximate acres needed
14. On current map: Red area SW of AFB should be commercial/industrial only – protect the green corridor in there
15. We should not be referring to this as the “preferred” scenario
16. Existing pattern along transportation corridors is mostly residential –how do we add proposed higher densities and still be compatible with existing development?
17. We still have not considered 2025 first as I have asked in the last meetings.
18. The concern is if we go ahead with this map and it passes all models, then we have effectively adopted this scenario-there are too many issues still open to allow that to happen (attach John Frederick’s document here)
 - a. **Suggestion was made to put a forum together with the PMT and Consultant**
19. Agriculture relies on open space and economics, open space is not enough to preserve agriculture.
20. Area next to racetrack, let city of Homestead decide what goes there (fly zone limits its use anyway)
21. Eastern/South area of UEA on map limits what could be done with UEA as of now (indicates industrial and commercial between 2006-2050)
22. Straighten out UDB on western edge near the southern portion of US1
23. Groundwater levels and water supply must be considered in this study
24. Existing development along US1 is now primary residential – may not be compatible with densities on newest version of the map
25. Don’t increase densities in West Kendall
26. This is a conceptual vision and these lines on the map are conceptual only
27. Current development practices are killing Biscayne Bay (a recent study shows it’s failing)
28. Don’t stop this process because we don’t know what will happen in the future
29. Support limiting densities east of 147nd Ave to UDB; this area has a strong sense of community
30. From Louise King:

- a. Support Dick Frost's comments regarding removing all increased densities east of 147th Avenue to UDB. This agricultural area is an historical agricultural community that our vision statement says we want to protect. Put extra density up in existing UEA at end of Kendall and Krome (177th Ave). There are no residents there, and has been in existence at least since the 1990's.
 - b. Change wording on the map to "Stormwater Treatment and Retention Study area to be considered in basins C-1, C-102, and C-103.
 - c. Move blue line (21 du/acre) in Florida City so that it is west of transit corridor (FEA), this will provide the minimum density (15 du/acre) that is needed to support this type of transportation.
31. 97th Avenue west should not now be shown as wetlands; if it is needed as wetlands later it can be added
 32. Bird Road Basin needs to be shown as a wetland and it isn't showing now
 33. East of US1 and East of Turnpike—concern that uses should be moved further from Biscayne Bay---We should be improving Bay water quality not only maintaining it
 34. Area near HAFB that is showing as commercial/industrial was suggested to be water retention and recreation area and now that is not what is reflected
 35. The "#7" shaped area (employment) contains the zoo and the largest Remnant Natural Forest
 36. Park would be concerned about using HAFB as joint use
 37. Groups like this make lines on a map meaningful
 38. Short report to this Committee is needed on what happened with agriculture study meeting with County Manager
 39. We have not yet addressed the vast array of implementation strategies available—we need to hear about them and what were their keys to success; this is a process issue; we are being asked to go forward before we have all the information
 40. Mark Oncavage suggested moving back the UDB in the South along the red lines on current map and would like a separate modeling done
 41. We have an obligation to respond to public's comments and address their concerns
 42. We still are not being given enough lead time to review the materials and go to our constituencies
 43. We have not yet reviewed Task 3.6—this is needed before we can consider accepting the map
 44. Motorsports facility area—they are looking forward to more parking space—not being considered for industrial/commercial because parking is needed
 45. Text on map needs to reflect what zones actually are
 46. We need to do a 2025 map first before a 2050 map—2025 is a more reasonable time to make predictions
 47. Take out the word "preferred" from any references in the map
 48. It is interesting Scenario 1 is best for water supply while scenario 3 is worst on water supply

MAP CONSENSUS

It became apparent from the discussion that asking the Committee to come to consensus on the new version of the map was not appropriate. The question to be posed was:

"The map is accepted as a draft scenario for the purposes of running the assessments pursuant to Subtask 1.8 the see how the scenario performs. The Committee affirms that its acceptance of running the model is not the final work product and that there is still significant additional discussion to be held concerning the scenario and implementation strategies."

MEMBER FORUM

- 1) Krome Ave should be a major transit corridor – it is not showing as such on map
- 2) We need to look at 2025 first
- 3) Why was original name of this group changed?
- 4) Primary focus is supposed to be how to protect BNP? We are still not addressing that
- 5) It is not the Park's job to come up with how to protect the Park, it is the job of this study to do that
- 6) Building Industry/Planning Dept. will be having a panel discussion sometime in 1st or 2nd weeks in March to discuss how calculations are done and give reactions on how this process is done

EVALUATIONS/ADJOURN

Members were reminded to fill in their evaluations and the meeting was adjourned.

MEMBER COMMENTS SUBMITTED SUBSEQUENT TO THE MEETING

Jeff Flanagan provided a statement from Chamber South ([Exhibit D](#))

From Bill Losner (Also attached [Exhibit E](#))

Attached are my comments/questions that I prepared for yesterday's meeting. I still don't understand why Gables Estates and Gables by the Sea were not included in the study area as was mandated by the regional committee that requested the study. There were comments made by the representative of Audubon about the quality of water in Biscayne Bay. What studies have been done pertaining to Mount Trashmore polluting the Bay? Why is it automatically assumed that the farmland developed south of Homestead Air Reserve Base and east is going to pollute the Bay? There is no scientific evidence. The comments made by John Fredrick were very apropos.

I never thought in my life that I would suggest less than one house on five acres in the ag area, but it appears that the movement is to freeze the development line until at least 2050. With all the pressures that the farmers that own their land have from sources they can't control, I feel certain that before the year 2050 some will want to sell their land. They had zoning of one house per one and a quarter acres until approximately 1975. I believe the Farm Bureau's suggestion that all ag land be rezoned to one and a quarter acres is a good suggestion and will create less urban sprawl. We are not an ag area in South Dade. We are an urban area. Eighty-five thousand acres of farmland is nothing compared to what other counties have. One and a quarter acres zoning is not unreasonable.

SOUTH MIAMI-DADE WATERSHED STUDY AND PLAN
Prepared by John Fredrick, Dade County Farm Bureau
February 22, 2006

The Miami-Dade County Board of County Commissioners created Amendment 14 to the Comprehensive Development Plan, establishing the South-Miami Dade Watershed Study and Plan

("Study"). This resulted from the dispute of landowners whose land was adjacent to Biscayne National Park was designated a buffer zone by the United States Department of Interior.

The initial and fundamental purpose of the Study was to discover ways and means to compensate private landowners in the buffer zone and to mitigate the effects of freshwater runoff into Biscayne National Park. Once established, the Citizens Advisory Committee of the Study, created a vision that broadened the Study to encompass many concerns of the various stakeholder groups.

The vision pursued many objectives which include the following:

1. Supports an economically viable and diverse agriculture.
2. Ensures a healthy and sustainable South Biscayne Bay and Everglades National Park.
3. Promotes open space, tourism and recreational facilities based on natural wonders that welcome other compatible enterprises.
4. Supports sustainable urban development that preserves historic quality and rural character with a strong sense of local community and stewardship.

These visions were created in the context of honoring private property rights.

During many years of deliberation, scenarios were created by the consultant, Keith and Schnars, and focused principally on managing urban growth to the year 2050.

Many of the concerns of the represented participants were not considered or were given cursory recognition. The fundamental questions creating the Study have not been answered to satisfaction. It appears the outcome of the Study will be a land use and growth management plan to theoretically accommodate urban growth to year 2050. The Study proposes a dense urban core along U.S. 1 and increases zoning densities with a slightly expanded Urban Development Boundary. While this proposal may satisfy some concerns, it fails to address many.

From the beginning, the Dade County Farm Bureau, Miami-Dade County's oldest and largest agricultural organization, has been keenly interested in the process and the proposals generated by the Study. While the scope of the Study is broad (perhaps too much so), the principle concerns of the Dade County Farm Bureau have related to flood protection and property rights protection.

Though intimately connected, it is surprising that the watershed Study is not concerned with groundwater levels and only canal water level maintenance is considered. Groundwater level maintenance is crucial to the sustainability of agriculture. The Study has failed to adequately address concern for groundwater levels as specified in the land use element of the Study. It appears to the consultants that the Comprehensive Everglades Restoration Plan (CERP) and the Combined Structural Operation Plan (CSOP) may be appropriate vehicles that will address water concerns more in depth.

We do not know the extent to which CERP and CSOP address flooding issues but they greatly concern both agriculture and urban areas. CERP and CSOP will also mitigate water inputs to the national parks and change the impacts of pollutant loading from the modeled basins of the Study, possibly creating a different land use scenario than proposed.

Other objectives of the Study support an "economically viable agriculture" while promoting open space and preserving rural character. While these are interrelated because agriculture must have open space to operate, open space and rural character can be achieved without the existence of commercial agriculture. Some promote the idea of open space in the name of preserving agriculture but really only want to create buffers for the national parks.

Commercial agriculture will exist only if it is economically viable. Nothing in the Study has been proposed to economically sustain agriculture. It would be appropriate to substitute the term open space where agricultural lands are used. If the intent of the study is to create open space as buffers for the national parks, then we should call them such and not refer to them as agricultural lands.

The long-range economic forecast for Miami-Dade County agriculture by the University of Florida in predicts significant decline of agriculture over time. Many of the reasons are beyond our local control. Agriculture is currently the most significant component of economy in South Miami-Dade County and will remain if economics are favorable. The Dade County Farm Bureau is committed to the continuation of agriculture and its economic sustainability. However, it is unjust to deny landowners the right to use their land if they are unable to profit from its use.

If agriculture can not economically viable, then what is to become of the land and who will maintain it? If open space is desirable and necessary for buffers, there is a public benefit and landowners must be compensated. In 1975, the Comprehensive Development Master Plan was created and landowners

outside the Urban Development Boundary downzoned from 1 house on 1.25 acres to 1 house on 5 acre with the provision of moving the Urban Development Boundary over time to accommodate urban growth. Landowners agreed to the arrangement because it would help preserve open space for agriculture by curbing leapfrog development. It also gave landowners the long-term expectation that their land could be developed if agriculture was no longer viable.

Now, we are considering ways to possibly permanently restrict land use outside the Urban Development Boundary. Landowners' would be denied of their longstanding expectation.

It seems that landowners outside the Urban Development Boundary are expected to subsidize the creation of buffers and maintenance of green space without compensation. Under the proposed land use scenarios, some landowners inside the Urban Development Boundary will enjoy a windfall through increased densities and anyone outside the Urban Development Boundary will receive nothing.

The land use element of the Study specifies that it will "...identify and establish mechanisms for protecting constitutional property rights." Nothing has come forth to satisfy landowners. The consultants on property rights, Lewis, Longman and Walker, argue that property rights are not violated by the Study. However, effects of any plan created as a result of the Study will most certainly affect property values and property rights.

Transfer of Development Rights (TDRs) have been proposed to handle these concerns, but they need funding and willing participants to work. They are not the clear-cut and simple solution.

The Study is nearing completion and, to date, the Dade County Farm Bureau's concerns are substantially unaddressed. The Dade County Farm Bureau believes in the economic sustainability of agriculture, preservation of natural resources and responsible growth patterns for South Miami Dade. However, the Dade County Farm Bureau will not accept less than fair consideration for property rights.

The Study is based on 2003 data for modeling but the proposals and effects of other studies, future political modifications, sustainability of agriculture, changing market demands for housing and many factors will require any adopted plan to be flexible.

For this, and many other reasons, we propose the following components to be considered for adoption by the Study in order to support any scenario generated from it:

1. The Urban Development Boundary should not be frozen in perpetuity. If no further movement of the line is granted as the market dictates, then the zoning of 1 house on 1.25 acres should be afforded to landowners whose current zoning is restricted to 1 house on 5 acres or compensation given via public funding on this basis.
2. We believe that markets dictate the location of urban and commerce centers.
3. Wetlands should not be designated for creation in agricultural production areas.
4. Affordable housing for farm workers should be allowed in agricultural areas. The Everglades Village is a prime example of high-quality, planned labor housing in close proximity to agribusiness.
5. High-density housing along the U.S. 1 corridor is unrealistic because of political atmosphere and voting trends of community councils.
6. We believe that a Transfer of Development Rights program is largely unattainable because the overwhelming majority of landowners do not want their land downzoned and their rights restricted. There is simply not a demand for such a program, nor is there sufficient funding to purchase rights at fair market value. Also, the cost of purchasing development rights in today's market will not work economically.
7. Adopt the Interim Structural Operating Plan's 2001 benchmark criteria for maintaining canal water levels as endorsed by the South Florida Water Management District.
8. Identify lands outside the National Park boundaries necessary for buffers.
9. Well fields should not be located in areas of active farming, but, if so, the restrictions for agriculture on crop chemical inputs must be adequately addressed.
10. Groundwater levels should be maintained for agricultural production areas that give a level of protection that will not jeopardize the economic sustainability of agriculture and will follow the standards established to accomplish flood protection by maintaining groundwater levels that prevent or mitigate damage to crops.

OBSERVER COMMENT CARDS RECEIVED AT THE MEETING

- *Re: Wetland restoration and STA's, C1, C102, C103 – exactly where? Exactly how? (Raise water table lower land level)? Show impact to surrounding and adjacent lands. Restraints on Ag and or housing. Regulations that would impact surrounding lands. What exactly?*
- *UEA should be moved to SW 147 Ave to keep all housing in area where houses on zero lot lines already exists. Traffic has access to turnpike and 137 Ave.*
- *Regarding employment center bounded by 184 St. S to (Hammocks) 120 St. – The south portion of this area is Park and Federal lands. Certainly in the one S of 152 notwithstanding the Zoo plans is hardly an employment center or potential E.C.*
 - *Colleen H. Boggs, 16300, Sw 184 St. Miami, Fl 33187. 305-233-5501(0); 786-412-9067(c)*
- *1) Greenways should NOT traverse the Ag area. Entered position letter previously. Where is it? 2) No increased density or Rew UEA's outside UDB! 3) Annex land west of Florida City should be programmed (projected) for the population that will be there. Population in this area should be subtracted from # of units in Watershed area. 4) Zone A does not follow transportation corridor in Homestead/Florida City. Should be expanded to the West. 5) Why was Horse Country removed from Zone B and Redland was not? 6) Why was old UEA removed in West Kendall? 7) West Kendall, old UEA, has no community and no population. New UEA and Zone B in Redland is as historical community. 8) Shift Zone B in Redland to the east inside the UDB.*
- *Krome should not be widened. There are no data (crash, fatality, population) that would support widening. Widening would encourage development – advocated by land speculation. Krome goes through CERP Agriculture land and environmentally sensitive lands. Improve the road – do not widen.*
 - *Pat Wade*
- *My comments reflect, what I believe, the thoughts of the vast majority of the citizens who cannot be at the meetings: As citizens and stewards of our land and waters, we owe it to our children and grandchildren to protect our natural resources. The only possible way to accomplish this is to limit or restrict further development in South Dade, concentrate on cleaning up our storm water runoff, conserve water and place future residents inside the Urban Development Boundary. Along with this, we need good mass transit systems. We have a unique agricultural area that should be maintained. We need community leaders who will make smart decisions and take pride in planning for the future of our children's quality and life. I urge the committee to recommend that future growth in South Dade be limited. The proximity of The Keys, Florida Bay, Biscayne Bay and the Everglades is such that these waters would be further degraded if more development is allowed. Please send the county commission the message that the future health of our waters is at stake and that we require that they plan 25 to 50 years ahead, rather than just till the next election.*

Dewey Steele

PUBLIC COMMENT SUBMITTED SUBSEQUENT TO THE MEETING

*Comments to the Watershed Study Members during Public Comment by Steve Torcise, Jr., President,
Atlantic Civil and endorsed by member Bill Losner
2/23/2006*

Over the past few years I have asked Mr. Swakon to represent our interests as it related to the Watershed Study. What I have been constantly been advised is that the "science" behind the study has been unavailable for us to test, and to validate. Most importantly, what little has been provided was done so after it was voted upon.

As we have monitored the progress of the study, we have become increasingly concerned about the impact of the results. As you know, we have consistently raised objections to the lack of public input, the lack of response to our input and the appearance of unsupported outcomes.

Those concerns are now validated in the culmination of the latest "draft preferred scenario" which has been published in two public workshops prior to being approved by the committee members. How is it possible to go on a public campaign for a draft of a "preferred scenario" prior to acceptance by this Committee and prior to submission to the County? I submit the draft of anything submitted to the public is unacceptably premature. This is a study, not a road show.

As a simple example of why the science may not support the conclusion, I offer the following:

According to the "draft preferred scenario", one area proposed for development outside the UDB is the area based on the "science and modeling" is the area north and east of the HAFB. I would like to compare and contrast this to our property as a simple example of why the science is troubling for everyone, not just myself:

1. This area is a wetland area. In order to develop this property, a net increase of wetland loss is required. Accordingly, our property will not increase wetland loss, yet it is deemed not a development area. So destroying hundreds of acres of wetlands as opposed to an area that will not destroy wetlands was not a criteria. Otherwise we would be included in the development footprint.
2. This property is within a CERP footprint and has not as of yet been determined to be needed for CERP. Our property has already been determined by CERP at both the Corps and SFWMD level to be "NOT" needed for CERP. What if the study area is deemed to be needed for CERP? How valuable was the study when it knowingly put development in a CERP needed area when it could have put it in an area certain to not be necessary for CERP?
3. This property is approximately between ½ to 1 mile from Biscayne Bay. Our property is 8 miles away. Apparently proximity to the Bay is not a factor.
4. This property, using current water quality standards, will have some measure of pollutant load. Our project will be designed to have zero runoff at the 100 year storm. We will therefore have no pollutant load discharge. Zero. Apparently a site with some pollutant loading discharge into Biscayne Bay is preferred over one that does not.
5. The last seeming reason that this area was approved for "development" was its close proximity to the turnpike, about 1 mile away. Yet it is 3 miles from US 1, 3 miles from the Busway, and 7 miles from Krome Avenue. Our project is 1 mile from all four transportation corridors. So apparently transportation isn't a driving factor either.

Mr. Davis reported earlier that location of a development will have no effect on the amount of pollutant load to Biscayne Bay. My interpretation of what he means is that the study is incapable of specific development locations. So why are we looking at maps which designate areas for development locations when there is no science to back up locations on this map? In my opinion, the study is now a "lottery". I would like to think that everyone's lifetime investment into their property was never to be determined by "lottery".

Some property owners will have windfalls and walk through County approval. Others will be doomed forever with this study. I submit and appeal to every property owner here or not, that your property rights are being trampled unconscionably and it is not Constitutional. Myself included.

If this kind of science is going to be what you submit to the County as the best possible scenario in the future, I respectfully request this Committee stop any further progress because when the consultants won't provide the science to those most affected, and proceed to start a road show without your blessing, that is all you need to know and I would hope that you stop this train from going into a completely different direction than its mandate as you are about to infer irreparably harm to an enormous amount of property rights for a long time to come, to a great many people of South Dade.

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Public comments of Ed Swakon at Feb 23 Watershed Committee meeting and endorsed by member, Bill Losner.

First I would state again that public comments are not being incorporated into the proceedings and are not being distributed in a timely manner. My comments submitted electronically within days of the January 26th meeting are not included in the proceedings distributed to you today. In addition a review of the Scope of Work requires that public comments be address by the consultants within 30 days and the response posted to the web site. That is not and has never been done.

Today is a Watershed Day as Michael Putney said in his article today, but not for the same reasons he stated.

Today you are being asked to approve a plan for "testing" but you should not allow that to happen. I believe you as a committee have been mislead through out this process. I attended the Technical Review Committee (TRC) meeting last week as well as both public meetings. I was shocked to learn that the TRC has not voted or approved any work product. That's not the impression I got by sitting at these meetings for the last 2 years. When you as committee members raised issues you were told on more than one occasion: "Don't worry this has been reviewed by the TRC" I heard committee members at the TRC express concern about there name being included in the final report implying they indorsed or supported the out come. I heard TRC members question the Consultant for not addressing there concerns in a meaningful way.

I suggest you have been mislead about the TRC and I would suggest you request the chairman of the TRC come to this group and explain just what there role was and what they did.

At last night's public meeting I asked Mike Dave what they were going to compare the results of the model run to and how they would know they had the right plan. I urge you to probe that question also. Do the models predict different outcomes if the development areas (UEA) are moved from one area to another. I believe the answer is no! Why not look at each of the evaluation parameters (or groups of similar parameters) and determine what optimizes there performance. Then overlay the outcomes of the individual optimized parameter and look and areas capable of accepting additional development. How do you know when your plan is optimized? Only when you know it's optimized can it be called a preferred scenario.

Nothing you have been asked to do comes close to this type of an approach or utilizes the information from the test scenarios at all.

To underscore this point why are you only now being given section 3.6? And it's being given to you without the no water quality analysis? Why? The evaluation of the test scenarios? Seems backwards to me!

I suggest the only driving principle used to create the maps before you today was the desire to increase density along the bus way to support transit.

This plan is not ready for any type of adoption and I urge you hold out until you get a plan that works.

Thank you

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