



The Honorable Daniella Levine Cava
Mayor of Miami-Dade County
Stephen P. Clark Center
111 NW 1st Street,
Miami, FL 33128

Subject: Urgent Meeting Request - Concerns Over DERM Restructuring

Dear Mayor Levine Cava,

You have been a trusted champion for our environment, and a steadfast believer in the critical role of the Department of Environmental Resource Management (DERM) in protecting both our community and our natural resources. The undersigned organizations are deeply concerned about the proposed restructuring of DERM. While we welcome the decision to restore DERM as a standalone department, removing its environmental permitting authority and other key functions, such as stormwater management, would severely weaken Miami-Dade County's ability to safeguard its residents, protect natural resources, and achieve its long-term environmental and resilience goals. **Given the fast-approaching September 18 budget hearing, we respectfully request a meeting with you and your team as soon as possible to address the concerns outlined below.**

DERM's prior "demotion" to a division within the Department of Regulatory and Economic Resources (RER) inflicted lasting harm on its capabilities, effectiveness, and reputation. Restoring departmental status to DERM is an important step toward rebuilding capacity and efficiency, but that progress will be undone if its core regulatory responsibilities are stripped away. While routine permit application review may often be straightforward, other, more complex and high-impact projects require the expertise and accountability of a dedicated DERM director and expert scientific and engineering staff supporting the permit reviewers. Ultimately, it is the DERM director who will have to defend difficult decisions, but under this structure, they will not have oversight of those decisions. We are deeply concerned by the prospect of placing complex environmental and water management decisions under RER's building permitting center, without the expertise and leadership of DERM and its director. Such a shift risks undermining both the quality and efficiency of permit reviews. While current environmental permitting employees staying with RER may have existing relationships with subject matter experts within DERM, this integration will be short-lived as personnel and staffing decisions evolve.

Our concerns are amplified by DERM's history of diminishing authority, a gradual dissolution of what was once the premier environmental regulatory department in the county. A robust DERM requires leaders who are empowered to leverage and invest in their team, capacity, and decision-making expertise. But this decision does the opposite. Removing permitting authority would represent the final unraveling of DERM's regulatory role, making it increasingly difficult and less efficient for the County and your administration to leave a strong environmental legacy and a resilient Miami-Dade. We cannot find any examples of major

counties or cities where the environmental regulatory department does not have the authority to implement its regulations through permitting.

The fundamental question in this decision is not about the current team or your administration, but rather about looking to the decades ahead, when the leadership of both DERM, RER, and the Mayor's Office is yet to be determined. Removing the statutory authority from DERM makes it easier for a future administration or the Commission to gut it entirely. This is exactly why efforts to weaken DERM's permitting authority have surfaced time and again, attempting to make way for improper development at the expense of critical resources and natural infrastructure like pine rocklands, wetlands, mangroves, seagrass, and more. This proposal is inconsistent with the leadership we have long relied upon from you as our environmental champion.

We fully agree that DERM's efficiency and internal operations can and should be improved, and we fully support measures that strengthen its performance, speed and transparency. However, these measures can be taken while keeping DERM's authority intact.

Thank you for your leadership and attention to this critical matter. We look forward to the opportunity to meet with you.

Sincerely,

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