



**INTERNATIONAL
BROTHERHOOD
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KENNETH W. COOPER
International President

PAUL A. NOBLE
International
Secretary-Treasurer

February 8, 2023

VIA EMAIL AND US MAIL

The Honorable Deb Haaland
Secretary
U.S. Department of Interior
1849 C Street NW
Washington, DC 20240

Re: IBEW Support for the Miami Wilds Project in Miami, Florida

Dear Secretary Haaland:

I am writing on behalf of the International Brotherhood of Electrical Workers, AFL-CIO, CLC (“IBEW”) to ask that you carefully review the U.S. Department of the Interior’s (the “Department’s”) position on the Miami Wilds Project (“Miami Wilds”), a \$170 million economic development project that would create approximately 100 IBEW jobs for members of IBEW Local Union 349 (“Local Union 349”).

The IBEW is a labor organization representing approximately 400,000 members working in the construction industry. IBEW members play a vital role in the future economic prosperity of their communities. IBEW local unions like Local Union 349 are the leaders in the nation in recruiting and training the highly skilled workforce necessary for responsible economic development supported by good, union jobs.

The IBEW supports the Miami Wilds Project in Miami, Florida. Miami Wilds is a long-planned waterpark, hotel and retail development project that represents significant economic opportunity for Miami-Dade County and the state of Florida. The project is strongly supported by local government officials, with the county having executed an 80-year ground lease for the project and committing nearly \$20 million to support it. Construction on the project is scheduled to begin in the third quarter of this year.

Unfortunately, Miami Wilds has been plagued by a series of frivolous lawsuits brought against Miami-Dade County and the Department by a coalition of local environmental groups. The lawsuits claim that the project site – currently used as a parking lot for the popular Zoo Miami – is a critical feeding ground for an endangered species of bat. Biological surveys performed by both the county and the developer have confirmed that the site is not the primary feeding ground for the bat and that there is nothing unique about the site as it relates to the bat or any other local wildlife. Nevertheless, these groups continue to litigate in a disingenuous effort to kill the project with an endless string of frivolous litigation that they know government agencies will be inclined to settle.

Thanks to partnerships with the IBEW and other labor unions, the Miami Wilds Project represents a significant, positive and responsible economic development opportunity for Miami-Dade County and the surrounding area. Good, union jobs create an economic ripple effect, as union members’ income contributes directly or indirectly to state and local payroll taxes, increased spending in local businesses and local



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construction vendors, investments in job training, increased local charitable contributions, increased tourism, and more. In addition to creating approximately 100 jobs for members of IBEW Local Union 349, the project will create roughly 460 direct construction jobs for other construction trades, as well as approximately 400 permanent jobs when the project is complete. As such, Miami Wilds stands to create massive economic potential for the region. This opportunity should not be jeopardized simply for the sake of settling nuisance litigation.

Given the significant economic impacts associated with this project, I ask that you review the Department's position on Miami Wilds and I urge the Department to vigorously defend against the lawsuits attempting to stop the project from moving forward. In addition, I ask that you review this matter with the U.S. Fish & Wildlife Service and the National Park Service and urge them to quickly review the project and the biological assessment data and issue an opinion as soon as possible.

I hope you will review the Department of Interior's position on the Miami Wilds Project and consider the positive impacts that it will bring to Miami-Dade County and the state of Florida.

Thank you for your time and attention to this important matter.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Kenneth W. Cooper".

Kenneth W. Cooper
International President

KWC:efw

Copy to Representative Mario Diaz-Balart

Representative Maria Salazar

Martha Williams, Director of Fish & Wildlife Service

Leo Miranda-Castro, Region 4 Regional Director, U.S. Fish & Wildlife Service

Chuck Sams III, Director of National Park Service

Mark Foust, Region 2 Regional Director, National Park Service

Mayor Daniella Levine Cava, Miami-Dade County

Commissioner Kionne L. McGhee, Miami-Dade County Commissioner