



**Position Statement Update**  
**Jumbolair Aviation & Equestrian Estates**  
**Planned Unit Development**

Horse Farms Forever® monitors all development applications with a primary focus on the nearly 200,000-acre Farmland Preservation Area. As a result of this monitoring, we were alerted to an application for a Comprehensive Plan Text Amendment and Planned Unit Development (PUD) on the Jumbolair property located in Anthony. The PUD allows for up to 485 units on 475 acres.

The Jumbolair property straddles the boundaries of both the Urban Growth Area and the Farmland Preservation Area. About 92 acres, or 20% of the PUD, are located within the Farmland Preservation Area, with about 50 of those acres currently in use for a portion of the existing airport runway and drainage retention. On the remaining 40-acre parcel in the FPA, the applicant proposed increasing the density by clustering 22 single family residences and several airplane hangars.

We reviewed the application and opposed two elements of the application:

- The plan to cluster 22 housing units on a 40-acre horse farm located in the Farmland Preservation Area (Parcel 14106-000-00). The use of clustering is not permitted within the Farmland Preservation Area.
- The plan to transfer density to the 40-acre horse farm located in the Farmland Preservation Area from the other FPA parcel currently used for existing runway and drainage retention (Parcel 14601-001-00). A portion of this parcel is also located in the FPA. The 15 lots from the runway parcel cannot be transferred to the 40-acre horse farm parcel because densities cannot be combined within the Farmland Preservation Area.

Because the remainder of the proposed Jumbolair development was located outside of the Farmland Preservation Area and inside the Urban Growth Area, Horse Farms Forever took no position on it.

- This includes another 40-acre parcel, (Parcel 14105-000-00), which is partially located within the Farmland Preservation Area and zoned A-1. The PUD Concept Plan shows several aircraft hangars on the portion of the parcel located within the Farmland Preservation Area. Since aircraft hangars are permitted in approved fly-in communities on parcels with A-1 zoning, Horse Farms Forever took no position on this proposed section of the PUD.

The original PUD application took broad liberties with the Land Development Code for Planned Unit Developments by proposing to transfer density within the boundaries of the PUD to a 40-acre horse farm in the Farmland Preservation Area. While the LDC allows densities to be allocated



within the boundaries of a PUD, the LDC also requires that such actions comply with the Comprehensive Plan, which takes precedence. As stated in the Comprehensive Plan, cluster density bonuses shall not be permitted within the Farmland Preservation Area.

After Horse Farms Forever wrote a detailed letter to Growth Services opposing the portions of their application that involved the Farmland Preservation Area, Jumbolair agreed to remove those specific portions of the application. The applicant also agreed to comply with the zoning densities in the FPA to limit the density on the 40-acre parcel to four housing units. The parcel is zoned A-1, which also permits private airport hangars.

As stated in Policy 9.1.10 of the Comprehensive Plan, there are two ways to increase development density and/or intensity: 1) The Transfer of Development Rights program, or 2) a Comprehensive Plan Amendment.

While Growth Services staff recommended the use of the TDR program to increase density, at this time, the TDR program is not required to increase density. It is one of the two options that the applicant must choose from to increase density. For the Jumbolair PUD, the applicant chose to do a Comprehensive Plan Amendment. The County Commission will make the decision about the compatibility of the increase in density based on the competent and substantial evidence in the PUD application.

**In summary, Horse Farms Forever opposed the portion of the PUD application that clustered 22 housing units on the 40-acre parcel in the FPA. When the developer agreed to remove that clustering of density on the 40-acre FPA parcel, we had no further objections as the remainder of the PUD was located within the Urban Growth Area. We thank the Jumbolair professional representatives for their willingness to modify their plans.**

## **BACKGROUND**

Jumbolair is an existing aviation and equestrian community that includes one of the largest private runways in North America. In 2021, a new owner, Bull Land Holdings, purchased the property and has applied to fully develop the property into the **Jumbolair Aviation & Equestrian Estates**. The application was submitted to Marion County on August 25, 2023, for a Planned Unit Development (PUD) with up to 485 units on 475 acres.

The boundaries of the Farmland Preservation Area were not drawn randomly. Horse Farms Forever has done the research to source the original documents and to speak with the professionals involved in the designation of the boundary lines. At the core of every decision to create the FPA was the concern for the high quality of the soil for agricultural activities and as a recharge area for the primary and secondary springs protection zones. In many cases, this resulted in the FPA boundary aligning with roads, and in other cases the boundary aligns with sectional lines from the public lands survey system that establishes sections and townships. As parcels of land can be divided, the boundaries of the FPA often do not align with parcel lines.



In the case of Jumbolair, the property straddles the boundaries of both the Urban Growth Area and the Farmland Preservation Area. This is a complicating factor in understanding the application for future land use and zoning change, as the northern one-fifth of the development is in the Farmland Preservation Area while the southern four-fifths are in the Urban Growth Area. The UGA is where the comprehensive plan anticipates growth and higher density. Nonetheless, there are a lot of parcels inside the Urban Growth Area with a Rural Land designation that are being used as horse farms and other agricultural activities. As expected, the risk for development in the UGA area is significantly higher than inside the FPA.

In complicated applications like this one, the role of Growth Services cannot be overstated. This is even more true when there is a large runway involved and a concentration of existing mixed uses such as industrial and commercial uses. While the initial Growth Service Staff Report recommended approval of the application, that favorable determination was conditional on certain actions by the developer. When the application went before the Planning & Zoning Commission on October 30, 2023, the Staff Report was changed to recommend denial of the application. The P&Z Commission followed the recommendation of Growth Services staff and voted to deny the application.

The application now moves forward to the Board of County Commissioners for consideration on December 5, 2023. The role of the Commissioners is to hear the recommendations of the Growth Services staff, hear the explanation of the application by the applicant, and then take public testimony. Unless some unknown factor comes into play, the commissioners should then vote on the application.

The commissioners are obligated to follow statutory guidelines for approving changes to the comprehensive plan and subsequent zoning changes. The three major tenants of those changes are consistency with the comprehensive plan, compatibility with surrounding areas, and in the public interest. This is where the voice of the community, especially the neighbors, becomes vital. The commissioners have a lot of latitude in determining the compatibility of an application with surrounding areas. This is especially true for a development that involves aircraft, as the noise and safety factors are amplified.

Horse Farms Forever trusts the judgement of the professionals at Growth Services and the elected County Commissioners as they evaluate the effects of this application and its compatibility with the surrounding area. The Marion County Board of Commissioners are to be complimented for their strong support of the Farmland Preservation Area and recognition of the valuable contribution made by the equestrian industry.

The mission of Horse Farms Forever® is to inspire conservation of horse farms through education, awareness and idea exchange so as to preserve the character and culture that horses and the Farmland Preservation Area make unique to Marion County. We are watchful of government and others to preserve and protect horse farms and farmland for future generations, especially in the



Farmland Preservation Area. We are neither anti-growth nor anti-development, rather encouraging urban growth to remain inside the Urban Growth Boundary.

Horse Farms Forever® is registered with the Florida Department of Agriculture and Consumer Services as a charitable organization and approved as a tax-exempt 501 (C) (3) corporation by the Internal Revenue Service. Horse Farms Forever does not have a political mission. Our status as a 501(c)(3) charitable organization does not allow us to participate or intervene in political activities. The organization will neither advocate on behalf of political candidates nor advocate for the passage of legislation.