

STATE OF FLORIDA
DIVISION OF ADMINISTRATIVE HEARINGS

Charlotte C. Weber, Individually and
as Trustee of the Charlotte C. Weber
2001 Revocable Trust,

Petitioner,

DOAH Case No. _____

v.

Marion County, Florida,

Respondent.

_____ /

PETITION FOR FORMAL ADMINISTRATIVE HEARING

Petitioner, Charlotte C. Weber, Individually and as Trustee of the Charlotte C. Weber 2001 Revocable Trust (“Petitioner”), hereby requests a formal administrative hearing pursuant to Sections 120.57(1), 120.569, and 163.3184(5)(a), Florida Statutes, to challenge two related and concurrent amendments to the Marion County Comprehensive Plan, adopted by the Respondent, Marion County, Florida (the “County”), on March 18, 2026 through Ordinance Nos. 26-09 and 26-10, which are not in compliance with the Community Planning Act, Sections 163.3161, *et. seq.*, Florida Statutes (the “Act”), and alleges as follows.

INTRODUCTION

1. Golden Ocala Equestrian Land, LLC, together with its related entities (collectively “Golden Ocala”), owns and operates the Golden Ocala World Equestrian Center (“WEC”). Future Land Use (“FLU”) Policy 2.1.28 of the County’s Comprehensive Plan¹ provides that WEC is “a regional attraction consisting of *equestrian-related* improvements (including indoor and outdoor

¹ The County’s Comprehensive Plan can be found at:
<https://www.marionfl.org/home/showpublisheddocument/25900/638557960191000000>.

arenas, barns, show rings, etc.) and other improvements *to support the horse community* and the community in general.” (emphasis supplied).

2. On March 18, 2026, the County adopted two Comprehensive Plan amendments authorizing Golden Ocala’s development of the “World Equestrian Sports Complex” on an approximately 250-acre parcel of the overall WEC property (the “Sports/Entertainment Property”).² The Comprehensive Plan amendments include: **(1)** a Large-Scale Text Amendment (Ord. 26-09), attached as **Exhibit “A”** (the “Text Amendment”), which expands the scope of allowable uses for all land designated as World Equestrian Center (WEC) in the County’s Future Land Use Map (“FLUM”) to include *non-equestrian indoor/outdoor sports/event/expo facilities*; and **(2)** a Large-Scale Map Amendment (Ord. 26-10), attached as **Exhibit “B”** (the “Map Amendment” and collectively, with the Text Amendment, the “Plan Amendments”), which changes the Future Land Use designation of the Sports/Entertainment Property *from Low Residential (LR)* to WEC land use.

3. Golden Ocala’s proposed Plan Amendments change the Sports/Entertainment Property from a low-density residential area into a high-intensity sports expo consisting of numerous “outdoor fields for baseball, soccer, softball, football or polo uses, sports entertainment/expo venue areas, [and] parking, along with supporting services.” They fundamentally alter the “equestrian” nature of the World *Equestrian* Center by transforming it into a *sports and entertainment facilities* attraction.

4. Specifically, the Text Amendment amends Policy 2.1.28 of the Plan to describe the WEC as “a regional attraction consisting of equestrian-related improvements (including indoor

² There are 8 parcels included within the Sports/Entertainment Property: Marion County Property Appraiser Parcel Numbers 21081-048-00, and portions of 21069- 007-01, 21081-000001, 21081-001-00, 21087-001-00, 21087- 001-02, 21065-000-00, and 21069-010-03.

and outdoor arenas, barns, show rings, etc.), sports facilities and other improvements to the horse community and community in general.” (emphasized language added through Text Amendment). The Text Amendment further adds language defining “sports facilities” to include “*softball fields, soccer fields, indoor and outdoor arenas, and other recreational uses.*” (emphasis supplied).

5. Golden Ocala’s incredibly broad and vaguely defined “sports facilities” use is entirely at odds with the “equestrian-related use” described in the same Policy, which is defined as “a land use that is *principally rural and equestrian in character* and associated with and supportive of *equestrian sports*” including “polo fields, equestrian arenas, equestrian instruction facilities, veterinary clinics, farriers (non-mobile), stables and barns, and feed stores and tack shops.” (emphasis supplied).

6. The broad nature of the “sports facilities” use is demonstrated by Golden Ocala’s concurrent land development applications for a Planned Unit Development rezoning and Development Agreement, both of which were also approved by the County, which authorize concerts on the Sports/Entertainment Property.³ The ability to host concerts and music festivals at five different venues within the Sports/Entertainment Property is a radical departure from the *equestrian-related* uses currently permitted at the WEC.

7. Although the Rezoning and Development Agreement are not the subject of the instant Petition,⁴ they demonstrate the type of drastic and fundamental changes in the allowed uses that the Plan Amendments permit. The broadly defined “sports facilities” use that the Plan Amendments authorize includes large-scale sporting tournaments/competitions and

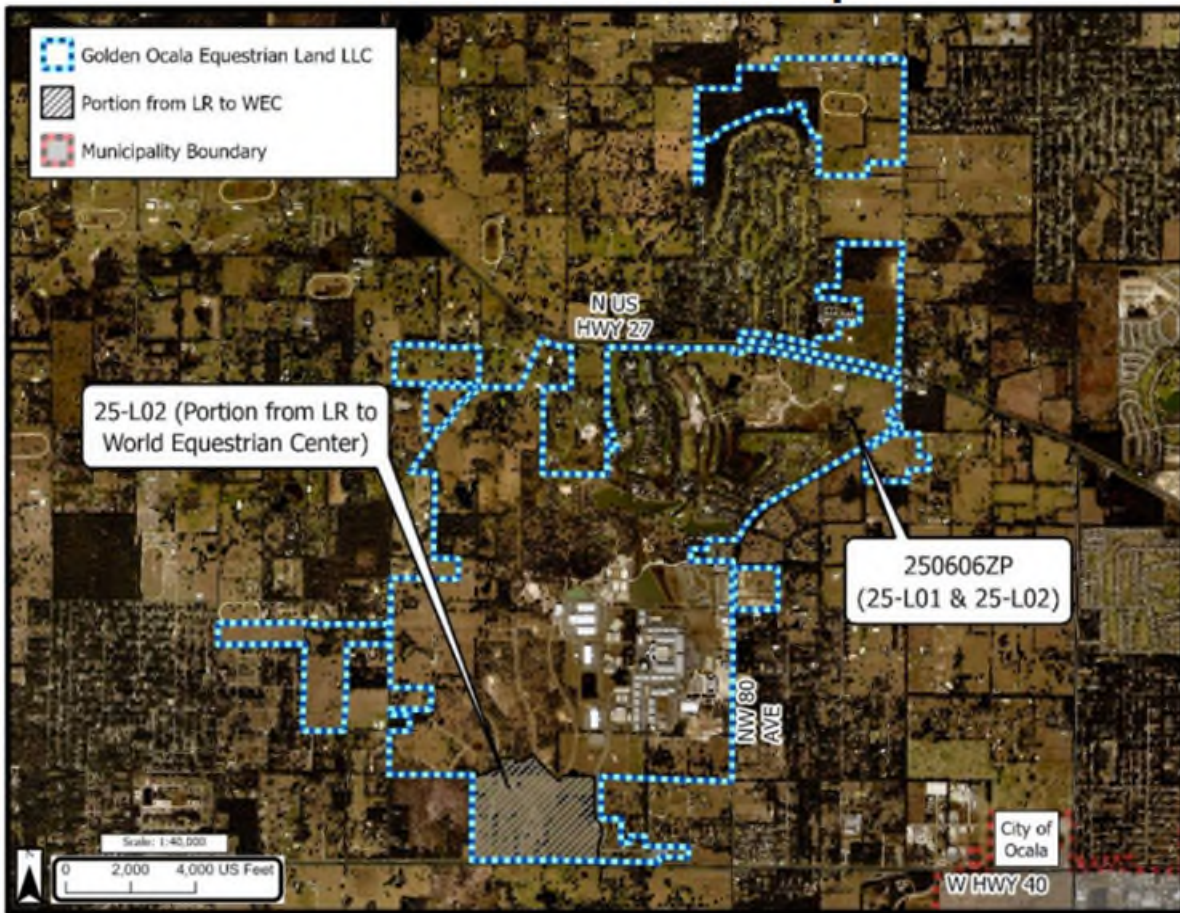
³ On March 18, 2026, the County approved the concurrent applications and adopted Ordinance No. 26-11 and Resolution 26-R-079 attached hereto as Exhibit “C” (the “Rezoning”), and the “Development Agreement ” attached hereto as Exhibit “D”.

⁴ Petitioner is simultaneously filing a lawsuit in Marion County Circuit Court challenging the County’s approval of the Plan Amendments (on procedural grounds), the Rezoning, and the Development Agreement.

entertainment/music events, which are entirely incompatible with the *equestrian focus* of the WEC.

8. Authorizing this “sports facilities” use at the WEC is especially concerning given the location of the proposed sports and entertainment complex development within the larger tract of the WEC property. The map below is an aerial photograph showing the location of Golden Ocala’s Sports/Entertainment Property within the overall WEC property, taken from the County’s Staff Report for the Map Amendment:

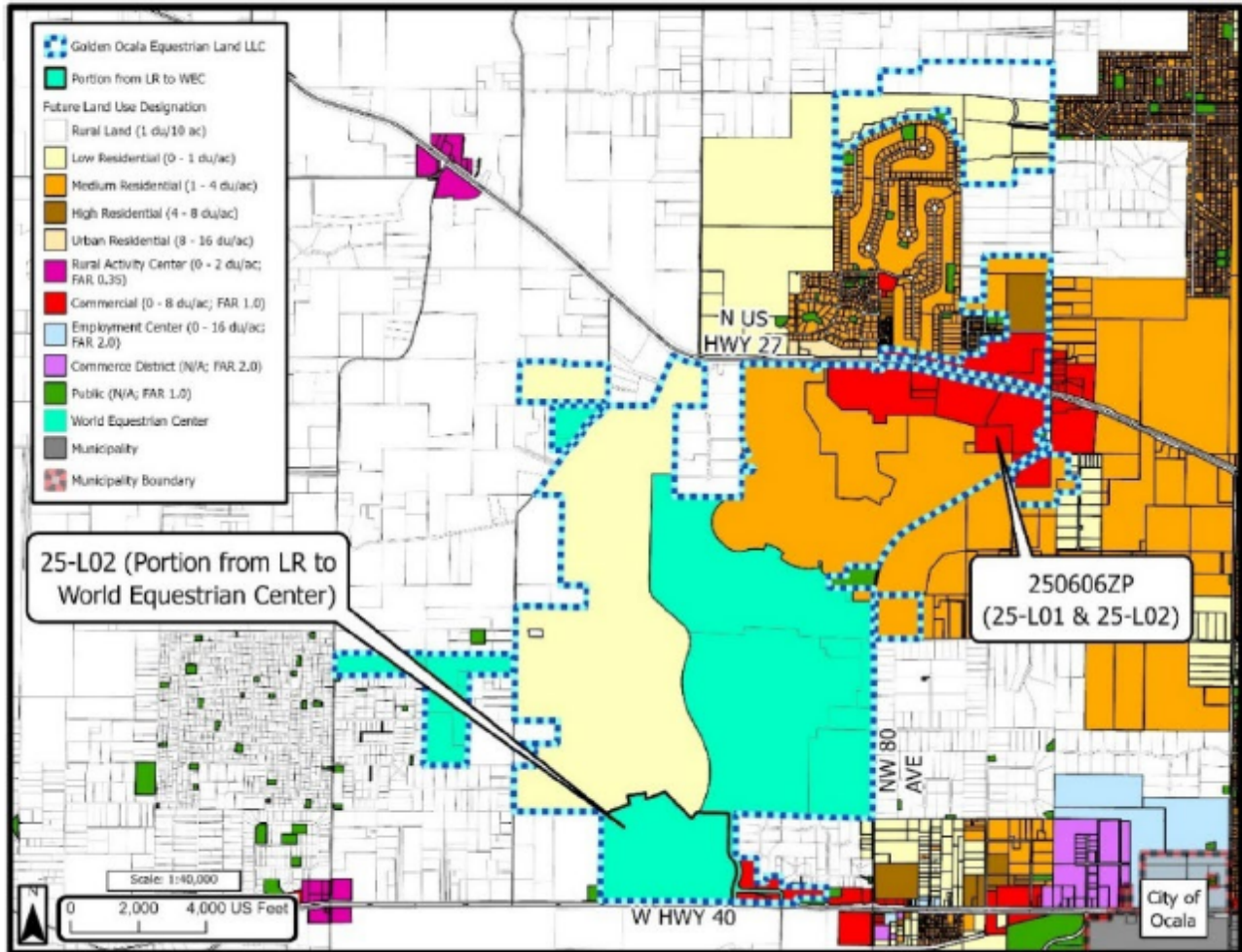
General Location Map



9. The properties to the west, south, and east of the Sports/Entertainment Property (which include Petitioner’s property to the south) hold a future land use designation under the

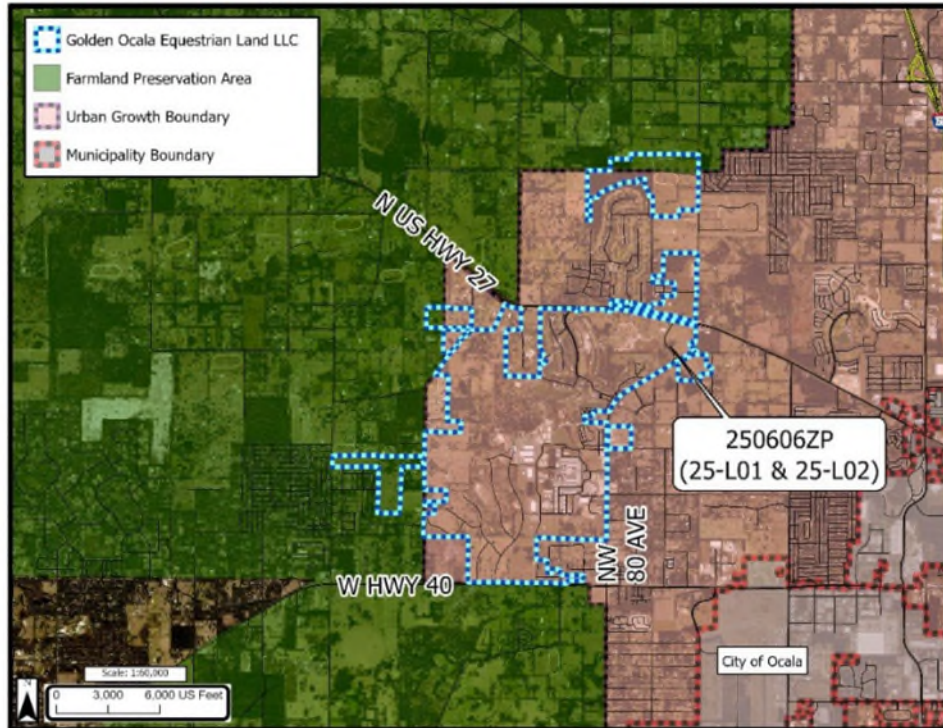
County's Comprehensive Plan of *Rural Land* (one residential unit per ten acres of land), shown in white in Figure 4 below.

Figure 4 - Proposed FLUMS Designation



10. Golden Ocala's Sports/Entertainment Property is also *directly adjacent* to the Farmland Preservation Area on the south side of State Road 40:

Figure 3
Farmland Preservation Area and Urban Growth Boundary



11. The Farmland Preservation Area “is intended to encourage preservation of agriculture as a viable use of lands and an asset of Marion County’s economy and to protect the *rural character* of the area.” The County established this area “as critical to the enhancement and preservation of its designation as the Horse Capital of the World.” (Plan at FLU Objective 3.3).

12. Consistent with FLU Objective 3.3, in prior applications to the Board of County Commissioners (the “Board”), *Golden Ocala acknowledged that any high density/intensity development within the WEC should be at the core of the property, with only lower density and intensity equestrian-related uses on the edge to create a compatible buffer to the Farmland Preservation Boundary.* Golden Ocala changed course, however, in its pursuit of the subject Plan

Amendments, seeking to develop high intensity “sports facilities” and concert venues *directly adjacent* to the Farmland Preservation Area.

13. Nonetheless, over numerous objections, on March 18, 2026, the Board approved the Plan Amendments. The Plan Amendments are not “in compliance” with the Act, as defined in Section 163.3184(1)(b), Florida Statutes.

PARTIES

14. Petitioner Charlotte C. Weber is a Marion County resident who has owned and operated a 4,300-acre thoroughbred farm in the County for over five decades, which is directly adjacent to the Sports/Entertainment Property and located within the County’s Farmland Preservation Area. Petitioner’s address for purposes of this proceeding is that of her undersigned attorneys, Scott McLaren, Shane Costello, and Fred “Kip” Marshall, Hill Ward Henderson, P.A., 101 East Kennedy Boulevard, Suite 3700, Tampa, Florida 33602, Phone, (813) 221-3900, Fax: (813) 221-2900, Email: scott.mclaren@hwhlaw.com, shane.costello@hwhlaw.com, kip.marshall@hwhlaw.com.

15. The County is a local government that is charged with the statutory responsibility of implementing and maintaining a comprehensive plan that complies with the Act. The County’s address for purposes of this proceeding is that of the Marion County Attorney, Matthew Minter, 601 SE 25th Ave., Ocala, FL 34471, and its file or identification numbers are 2026-22330 (Text Amendment) and 2026-22331 (Map Amendment).

STANDING

16. Petitioner has standing as an “affected person” to bring this challenge, and her “substantial interests” are affected by the County’s actions. Petitioner individually is a resident of Marion County who owns and resides at 12868 E Hwy 25, Ocklawaha, FL 32719. Petitioner

Charlotte C. Weber 2001 Revocable Trust owns real property in the County, identified as Marion County Property Appraiser Parcel No. 21355-000-00 (the “Weber Property”). The Weber Property consists of approximately 4,300 acres that is directly across the street from Golden Ocala’s proposed Sports/Entertainment Property, shown as the Farmland Preservation Area directly south of the Sports/Entertainment Property at Figure 3 above.

17. Petitioner, through her counsel, submitted oral and written comments to the County objecting to the Plan Amendments at the initial public hearing on July 21, 2025 and at the second public hearing on March 18, 2026. Petitioner, through her counsel, also submitted objection letters to FloridaCommerce and the Florida Department of Transportation following transmittal of the Plan Amendments after approval at the initial public hearing.

18. The Plan Amendments adversely affect Petitioner’s “substantial interests.” The Weber Property is rural land with an operating horse farm. It is located on the south side of State Road 40 across from the Sports/Entertainment Property. The traffic and noise generated by the extremely high-intensity development authorized by the Plan Amendments will have negative impacts on Petitioner’s horse farm operations. Further, the Plan Amendments are not compatible with the character of Petitioner’s property, which is located within the Farmland Preservation Area and designated as Rural Land in the County’s Future Land Use Map.

NOTICE OF AGENCY ACTION

19. Undersigned counsel for Petitioner attended the County’s adoption hearing on March 18, 2026 and received notice that the County voted to adopt the Plan Amendments at that hearing. Pursuant to Section 163.3184(5)(a), Florida Statutes, Petitioner had thirty (30) days from the date of the adoption to file a petition for administrative hearing challenging the County’s action. This Petition is timely filed.

CONCISE STATEMENT OF ULTIMATE FACTS

20. For the reasons addressed below, the Plan Amendments are not “in compliance” with the Act.

I. The Plan Amendments Are Not Supported by Adequate Data and Analysis.

21. Section 163.3177(1)(f), Florida Statutes, mandates that all “plan amendments shall be based upon relevant and appropriate data and an analysis by the local government.” The required data “must be taken from professionally accepted sources” and “may include, but not be limited to, surveys, studies, community goals and vision, and other data available at the time of adoption of the . . . plan amendment.” *Id.* “To be based on data means to react to it in an appropriate way and to the extent necessary indicated by the data available on that particular subject at the time of adoption of the . . . plan amendment at issue.” *Id.*

22. The County voted to approve the Plan Amendments at the initial public hearing despite a complete absence of the required traffic analysis, and subsequently adopted the Plan Amendments at the second public hearing based on insufficient traffic data and analysis.

(a) The Plan Amendment applications were incomplete and should not have been approved at the first hearing and transmitted to the State reviewing agencies.

23. The Board unlawfully approved the Plan Amendment applications for transmittal to the reviewing agencies at the initial public hearing on July 21, 2025. Golden Ocala’s failure to submit a Traffic Impact Analysis (“TIA”) with its initial applications, as required by the Comprehensive Plan, Land Development Code (“LDC”),⁵ Section 163.3184, Florida Statutes, and the Marion County Traffic Impact Analysis Guidelines (“TIA Guidelines”), renders the Plan

⁵ The County’s LDC can be found at:
https://library.municode.com/fl/marion_county/codes/land_development_code.

Amendment applications incomplete and legally insufficient and, therefore, the County’s approval unlawful.

24. Since the Plan Amendment applications were incomplete, the Board was not legally authorized to take action and, therefore, the subsequent Board approvals are null and void.

25. FLU Policy 5.1.1 of the Comprehensive Plan provides that “the County ***shall require an application with sufficient details*** of a request for an amendment to the Comprehensive Plan and the Official Zoning Map, consistent with Chapter 163, F.S., the Comprehensive Plan, Zoning, ***and LDC.***” (emphasis supplied).

26. Section 163.3184(4)(e)(3)(d),⁶ Florida Statutes, requires that a comprehensive plan amendment application package include “[a]ny data and analyses the local government deems appropriate.” Section 2.3.2 of the LDC—the requirements of which are incorporated into FLU Policy 5.1.1—addresses the “***submittal*** requirements” for Comprehensive Plan amendment applications (“CPPA”). Specifically, pursuant to section 2.3.2(c)(3)(g) and (h) of the LDC, Golden Ocala was required “at a ***minimum***” to submit “[a] Traffic Impact Analysis ... based on the maximum estimated traffic generation of the proposed Future Land Use Designation(s)” together with “[a]ny additional information determined to be necessary to analyze the CPPA to address consistency and compliance with the Marion County Comprehensive Plan, Marion County Land Development Code, and/or Ch. 163 FS.” Until an applicant submits this information “[t]he application will ***not be considered complete.***” LDC § 2.3.2(c) (emphasis supplied). *See also* LDC § 3.5.1(A)(1) (“The public may request or propose to amend, modify, or change a component of the adopted Marion County Comprehensive Plan by the filing of ***the appropriate*** Comprehensive Plan Amendment Application (CPAA) ***as provided in Division 2.3.***”) (emphasis supplied).

⁶ The Plan Amendment applications were subject to the state coordinated review requirements of Section 163.3184(4), Florida Statutes.

27. Further, the LDC incorporates by reference the TIA Guidelines,⁷ which expressly require that the applicant submit the TIA “*as part of* the Comprehensive Plan Amendment Application” and that the TIA “must be approved by the County no later than *two weeks before the Public Hearing* at the Board of County Commissioners.” See TIA Guidelines at **Exhibit “E.”**

28. Here, Golden Ocala did not submit *any* TIA with the Plan Amendment applications that met these requirements. Instead, Golden Ocala provided a facially flawed traffic “projection” entirely devoid of the required information and analysis. The first public hearing was in July 2025, and no requisite TIA was submitted or approved prior to that hearing. The plan amendment approval process requires two public hearings for a reason—so that the Board, the public, and the State have two opportunities to review and analyze the “data and analysis” and evaluate and comment on same, a matter of extreme import to Petitioner – whose property abuts the direct travel route to the numerous proposed Golden Ocala “sports facilities” and “concert” arenas, stadiums and fields. Completely skipping over the first public hearing deprived the Board, the public, and the State of this statutorily required process.

29. Indeed, Golden Ocala’s first submission of any TIA was in October 2025 -- and the submission of a revised TIA⁸ was in January 2026 -- which illustrates the deficiencies in the application. Pursuant to LDC § 2.3.2(c) and, by incorporation, FLU Policy 5.1.1, Golden Ocala was required to provide the TIA *before* the July 2025 public hearing as part of its application. That would allow the various interested parties, including the County itself, to review, consider and comment on the transportation impacts on the County roadways and other resources.

⁷ See LDC at § 2.3.2(C)(3)(g) (providing that the TIA “shall Comply with the County Traffic Impact Analysis Guidelines available at the Office of the County Engineer”).

⁸ The TIA is available at:
<https://publicinput.com/Customer/File/Full/46686021-a5be-4831-89bd-dbcd650a4468>

30. By voting to approve the Plan Amendments at the July 21, 2025 public hearing, the County violated the requirements of FLU Policy 5.1.1 and LDC § 2.3.2(c). Therefore, the County’s approval is not “in compliance” because it violated Section 163.3177(1)(f), Florida Statutes.

(b) The untimely submitted TIA is insufficient to meet the requirements of the LDC and the TIA Guidelines and fails to analyze the true impact of the Plan Amendment applications.

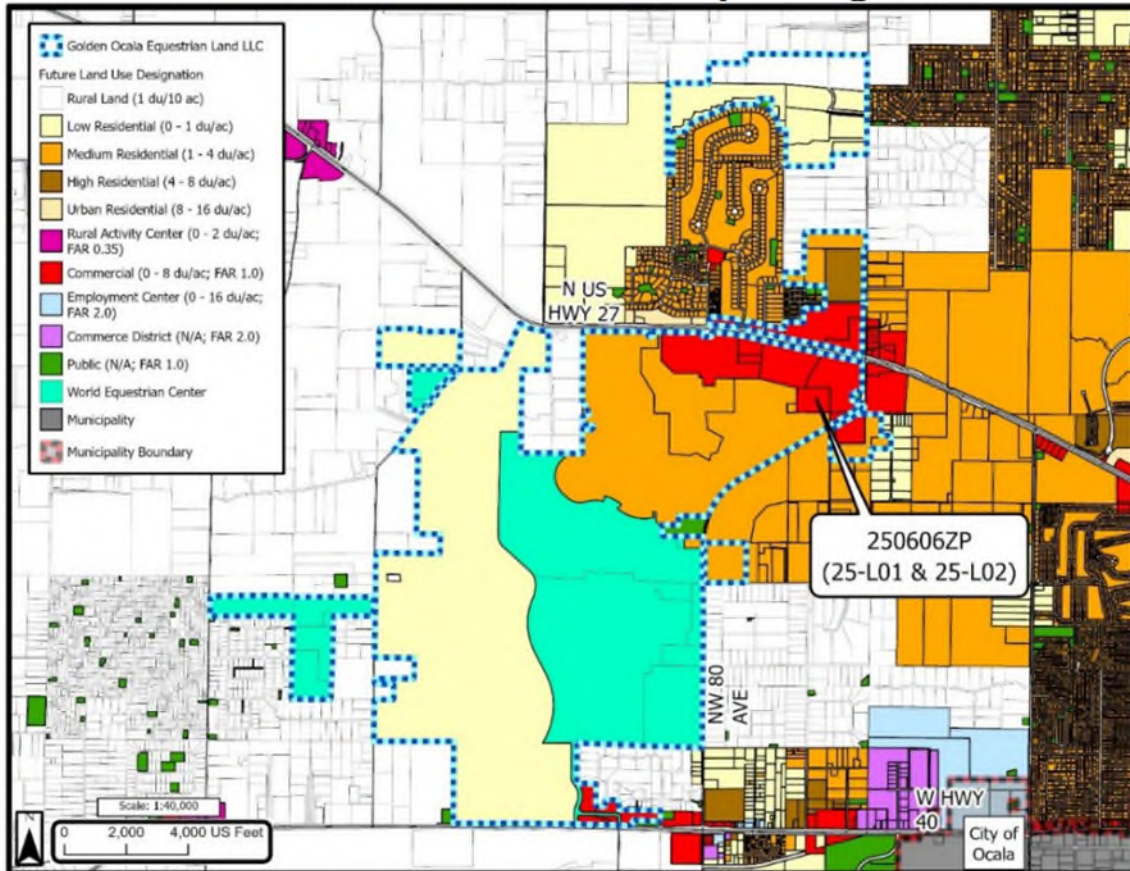
31. Golden Ocala’s untimely TIA submitted in October 2025 – and amended January 2026 – is also substantively deficient for several reasons including, but not limited to, the fact that it underestimates the true impact resulting from approval of the Plan Amendments. Therefore, it is not based upon relevant and appropriate data in violation of violation of Section 163.3177(1)(f), Florida Statutes.

32. First, while the area ***currently planned*** for “sports facilities” and concert venues, arenas and stadiums consists of 155-acres of the approximately 250-acre Sports/Entertainment Property that is the subject of the Map Amendment, the land use changes sought by Golden Ocala through the Text Amendment and approved by the County ***would allow “sports facilities” in every parcel that is currently designated as WEC in the Future Land Use Map.***

33. The map below shows the FLUM designations *prior to the subject Plan*

Amendments:

Figure 2
Current Future Land Use Map Designation



34. The TIA only addresses the potential impact on traffic in “an area of approximately 155-acres, located on the north side of SR 40 and the west of NW 76 Court Road” in which Golden Ocala *currently plans* to develop the sports and entertainment facilities. (See TIA at p. 5.) As previously addressed, this area is within Sports/Entertainment Property that was changed from Low Residential to WEC use in the Map Amendment. (See *supra*, ¶ 9, Figure 4.)

35. The TIA entirely ignores the fact that the Text Amendment approved by the County allows for “sports facilities” uses across all of the parcels that were previously designated for the WEC land use.

36. The TIA Guidelines require that a “Level of Service Analysis” is required for any Comprehensive Plan amendment application, which shall include *both* “an analysis of the trip impact generated by the proposed or most likely development plan” *as well as* “an analysis of **the maximum trip impact of the proposed land use**[.]” (See TIA Guidelines at p. 8) (emphasis supplied). See also LDC § 2.3.2(c)(3)(g) (requiring that a Comprehensive Plan amendment application “at a minimum” include “[a] Traffic Impact Analysis ... based on the *maximum estimated traffic generation* of the proposed Future Land Use Designation(s).”).

37. The TIA only analyzes the traffic impacts resulting from a land use change to allow the 155-acre “sports facilities” development. It fails to address the traffic impacts that the “sports facilities” use would have across other land owned by Golden Ocala that was already designated for WEC land use -- an area which, as demonstrated in Figure 2 above, is much larger than the approximately 250-acre Sports/Entertainment Property that was redesignated from Low Residential to WEC through the Map Amendment. The TIA is therefore deficient and fails to comply with the requirements of FLU Policy 5.1.1, LDC § 2.3.2(c), and the TIA Guidelines.

38. Second, approval of the Plan Amendments has demonstrably negative impacts on State transportation infrastructure that are worse than already projected. The TIA does not fully address these issues, and what it does address raises serious concerns.

39. Because of the woefully inadequate TIA, the true impacts of the Plan Amendments remain unknown, and the planned use of the Sports/Entertainment Property will overrun transportation infrastructure, leaving Petitioner and the public to suffer the consequences. For example, the TIA concedes that:

- a) The following SR 40 segments are projected to *reach or exceed capacity* under the buildout conditions:
 - SW 60 Avenue to SW 52 Avenue

- SW 52 Avenue to I-75 Ramp (West)
- I-75 Ramp (East) to SW 33 Avenue
- SW 33 Avenue to SW 27 Avenue

b) The eastbound left-turn movement at SR 40/SW 80th Avenue and the eastbound left-turn movement at SR 40/I-75 northbound ramp have *deficiencies* exceeding 100 feet caused by project trips. The southbound left turn at SR 40 at SW 60th Avenue has nearly *100 feet deficiency feet caused by the project*.

(See TIA at p. 64) (emphasis supplied.)

40. Significantly, many of these deficiencies are located at turn lanes directly abutting Petitioner’s property along SR 40.

41. Indeed, the Staff Report acknowledges that the TIA identifies deficiencies that have not been addressed, *or even defined*, stating that, “[t]he developer’s TIA accompanies [the Plan Amendments] and identifies a limited *series of deficiencies* [that] are expected.” (Staff Report, p. 14) (emphasis supplied).⁹ The Staff Report adds that the concurrent Development Agreement being considered “establishes a maximum timeframe of eight months for the developer to seek a new or further amended Development Agreement to address the proportional share obligations *based on the final outcomes of [] each of the Amendment considerations.*” (*Id.*, pp. 14-15) (emphasis supplied).

42. The referenced Development Agreement, which was approved by the County at the March 18th hearing, provides in relevant part that:

In connection with the [Plan Amendments], Owners submitted a WEC Sports Complex Traffic Impact Analysis (the “Traffic Study”) prepared by Kittleson & Associates. County has approved the Traffic Study.

Within eight (8) months after the Second Amended Effective Date, *owners shall submit to the County a further amendment*, or a new agreement, (either, the “Third Amendment”) *addressing the impact of the [Plan Amendments] on the County*

⁹ The County’s Planning & Zoning Section Staff Report for the Map Amendment (“Staff Report”) is available at: <https://marionfl.legistar.com/View.ashx?M=F&ID=15308070&GUID=A5001486-9C96-4673-B837-D03733C0DC85>

transportation system as well as additional issues deemed appropriate by the Owner and County, and shall thereafter pursue approval of such Third Amendment with due diligence.

(See Exhibit “D” at p. 5.)

43. Significantly, at the March 18th hearing, the County conceded that the proposed new “sports facility” and “concert” uses will substantially increase traffic on State Road 40 that abuts the Weber Property. For example, the County’s Senior Planner acknowledged that “*State Road 40 is the focus for the deficiencies*” and that the County’s “concern is once all the other current improvements for traffic are brought online in that area, it *may significantly change how access and routing of traffic occurs in this region.*” The County Engineer likewise agreed that “*there were some background deficiencies*” in the TIA and that “*State Road 40 is the one that came to the forefront.*”

44. In short, instead of adequately addressing and considering the deficiencies in the TIA, Golden Ocala and the County just ignored these serious admitted deficiencies.

45. Third, as stated above – in addition to the incredibly broad “sports facilities” use – the County approved Golden Ocala’s concurrent Development Agreement expanding concert use in the WEC DRI. The TIA is deficient because it does not include the extensive traffic generated by the expanded concert use.

46. Accordingly, the Plan Amendments are not “in compliance” because the County flagrantly failed to consider appropriate data and analysis in violation of Section 163.3177(1)(f), Florida Statutes.

II. The Plan Amendments Render the Comprehensive Plan Internally Inconsistent.

47. The Act requires that local governments implement comprehensive plans that are internally consistent. Section 163.3177(2), Florida Statutes, provides, “Coordination of the several

elements of the local comprehensive plan shall be a major objective of planning process. The several elements of the comprehensive plan shall be consistent.” Further, “Each map depicting future conditions must reflect the principles guidelines, and standards within all elements.” *Id.*

48. The WEC was created for one purpose – to provide for equestrian and equestrian-related support uses. Introducing high-intensity “sport facilities” and “concert” arenas, stadiums and fields is inconsistent with numerous goals, objectives, and policies of the Comprehensive Plan, as set forth below.

49. Goal 1 of the Plan is, “To protect the unique assets, character, and quality of life in the County through the implementation and maintenance of land use policies and a Land Development Code (LDC) that accomplish the following: 1. Promote the conservation and preservation of natural and cultural resources; 2. Support and protect agricultural uses; . . . 6. Ensure adequate services and facilities to timely serve new and existing development; [and] 7. Protect and enhance public health, safety, and welfare” The Plan Amendments are inconsistent with Goal 1 because they authorize incredibly high-intensity uses and development of property adjacent to agricultural uses, thereby jeopardizing agricultural uses rather than “support[ing] and protect[ing]” them. A property hosting major sporting events and concerts next to a thoroughbred horse farm is abjectly incongruous. Further, as discussed in detail above, the Plan Amendments unquestionably do not ensure adequate transportation infrastructure to serve the new development.

50. FLU Policy 1.1.1(2) requires the County to “[r]ecognize and protect the rural equestrian and agricultural character as an asset of the County’s character and economy while providing clear, fair and consistent standards for the review and evaluation of any appropriate future development proposals.” The Plan Amendments are inconsistent with this policy because

they neither recognize nor protect the rural equestrian and agricultural character of the adjacent Farmland Preservation Area.

51. The Plan Amendments are also inconsistent with FLU Policy 2.1.13, which has as its stated purpose the “Protection of Rural Neighborhoods” in the County:

Marion County shall recognize “rural neighborhoods” that occur within or outside of the UGB deserve *special protection from the intrusion of urban uses*, densities and intensities where new development occurs within the immediate vicinity. For the purpose of this policy, a rural neighborhood is an existing recorded or unrecorded subdivision where the overall density does not exceed one unit per three acres and the subdivision has a predominant Future Land Use Designation of Rural Land or Low Residential.

52. Far from affording “special protection” to surrounding rural neighborhoods, the Plan Amendments create significant existential issues for residential uses in the area by allowing extremely intense development of the Sports/Entertainment Property and uses that would create admitted traffic deficiencies and quagmires on an already overtaxed state highway system, among other concerns.

53. FLU Policy 5.1.2 of the Plan provides that “[t]he County shall review, and make a determination that the proposed modification [to the Plan] is *compatible* with the *existing* and planned development on the site and in the immediate vicinity ...” (emphasis supplied). The Plan Amendments are incompatible with the existing development in the immediate vicinity because they propose to place a sports, entertainment and event venues, including campgrounds, stadiums and arenas -- a large and very intense commercial use -- directly adjacent to the Farmland Preservation Area and Petitioner’s horse farm.

54. Golden Ocala admitted this incompatibility in connection with its prior application seeking to change the future land use designation of another area of the overall WEC property (Application No. 20-D01) (the “2020 Application”).

55. In the 2020 Application, Golden Ocala submitted a “Consistency Analysis”¹⁰ in which it repeatedly justified compatibility of that application with surrounding land uses by having low intensity uses and lower densities—such as the Equestrian Estates lots and Rural lands that make up Golden Ocala’s proposed Sports/Entertainment Property—serving as a transition from the more intense uses at the core of the WEC development to the neighboring Farmland Preservation Area:

Consistency Analysis (Exhibit F) of Application No. 20-D01

FLUE Policy 2.1.7 (page 8)

CONSISTENCY: THE PROPOSED AMENDMENT IS CONSISTENT WITH AND FURTHERS THE COMPREHENSIVE PLAN BY PROTECT EXISTING AGRICULTURAL AREAS ON THE EDGE OF GOLDEN OCALA. THE AMENDMENT ALSO PROVIDES THE REQUIRED SUPPORTING ANALYSIS DEMONSTRATING THAT THE AMENDMENT DOES NOT RESULT IN URBAN SPRAWL AND THAT PUBLIC FACILITIES ARE AVAILABLE TO SUPPORT THIS AMENDMENT.

FLUE Policy 2.1.13 (page 8)

CONSISTENCY: THE PROPOSED AMENDMENT IS CONSISTENT WITH THIS POLICY BY DIRECTING URBAN DEVELOPMENT TO ALREADY APPROVED AREAS, STEPPING DOWN DENSITY/INTENSITY ON THE EDGE THROUGH LOW DENSITY, EQUESTRIAN ESTATE LOTS AND RURAL LOTS, AND REDUCING THE OVERALL DENSITY OF THE PROJECT.

FLUE Policy 2.1.17 (page 10)

CONSISTENCY: THE PROPOSED AMENDMENT WILL LOCATE LOW RESIDENTIAL LANDS ON THE EDGE OF THE GOLDEN OCALA DEVELOPMENT WHICH IS ALSO ON THE EDGE OF THE COUNTY’S URBAN GROWTH BOUNDARY. THESE EDGE LOTS WILL BE AT A LOWER DENSITY WHICH WILL INCLUDE EQUESTRIAN ESTATE LOTS (1 UNIT PER 3 ACRES) AS WELL AS A TRANSITION FROM THE CORE OF GOLDEN OCALA TO THE EDGE OF THE DEVELOPMENT WHERE RURAL USES ARE PLANNED AS PART OF THE COUNTY’S FARMLAND PRESERVATION AREA.

FLUE Policy 3.1.1 (page 14)

CONSISTENCY: THE PROPOSED AMENDMENT PROVIDES A SUPPORTING ANALYSIS FOR THE 118 ACRES PROPOSED TO BE ADDED TO THE COUNTY’S URBAN GROWTH BOUNDARY. THE EXPANSION AREA IS DIRECTLY ADJACENT TO THE URBAN GROWTH BOUNDARY, HIGHER RESIDENTIAL INTENSITY LANDS ARE DIRECTLY ADJACENT TO THE EXPANSION AREA AND THE LANDS ARE TO BE PART OF A LARGER GOLDEN OCALA MASTER PLAN WHICH WILL SERVE TO CREATE A MASTER PLAN FOR THIS PORTION OF THE COUNTY. THIS MASTER PLAN INCLUDES LOWER DENSITIES (INCLUDING EQUESTRIAN ESTATE LOTS AND RURAL LOTS) ALONG ITS BOUNDARY TO SERVE AS A TRANSITION TO THE ADJACENT FARMLAND PRESERVATION AREA.

¹⁰ Excerpts from Golden Ocala’s Consistency Analysis submitted as part of its 2020 Application is attached hereto as **Exhibit “F”** with relevant portions highlighted.

FLUE Policy 3.1.2 (page 14)

CONSISTENCY: THE PROPOSED AMENDMENT FURTHERS POLICY 3.1.2 BY PROVIDING FOR A COMPACT URBAN DEVELOPMENT, ESPECIALLY ADJACENT TO THE WEC AND THE COMMERCIAL CENTERS AT US 27 AND STATE ROAD 40. THE PROJECT WILL THEN TRANSITION TO SINGLE FAMILY AND THEN TO EQUESTRIAN ESTATE LOTS OR RURAL LOTS. THIS TRANSITION WILL HELP PROTECT THE FARMLAND PRESERVATION BOUNDARY BY PLACING LESS INTENSE USES ALONG THE EDGE OF THE DEVELOPMENT.

FLUE Policy 3.1.4 (page 16)

CONSISTENCY: THE PROPOSED AMENDMENT FURTHERS POLICY 3.1.4 BY PLACING THE INTENSE PORTIONS OF GOLDEN OCALA FURTHEST FROM THE RURAL AREA AND TRANSITIONING TO A MUCH LOWER DENSITY ON THE EDGE OF THE PROJECT NEXT TO THE RURAL AREA. ADDITIONALLY, SOME OF THE LOTS ARE PLANNED AS EQUESTRIAN ESTATE LOTS AND AGRICULTURAL LOTS. THIS EQUESTRIAN COMMUNITY AND THE EQUESTRIAN FACILITY HELPS PRESERVE THE COUNTY'S VISION TO PROTECT THE HORSE FARMS OF THE COUNTY.

FLUE Policy 3.3.1 (page 18)

CONSISTENCY: THE PROPOSED AMENDMENT IS CONSISTENT WITH PROTECTION OF THE FARMLAND PRESERVATION BOUNDARY BY PLACING THE INTENSE PORTIONS OF GOLDEN OCALA FURTHEST FROM THE RURAL AREA AND TRANSITIONING TO MUCH LOWER DENSITIES ON THE EDGE OF THE PROJECT NEXT TO THE RURAL AREA. ADDITIONALLY, SOME OF THE LOTS ARE PLANNED AS EQUESTRIAN ESTATE LOTS. FINALLY, PORTIONS OF THE PROJECT ARE LOCATED IN THE RURAL LAND USE; THIS PORTION WILL DEVELOP CONSISTENT WITH THE RURAL CATEGORY EITHER AS AN EQUESTRIAN RECREATION USE OR AT VERY LOW RURAL DENSITIES (1 DU/10 ACRES). THIS EQUESTRIAN COMMUNITY AND THE EQUESTRIAN FACILITY HELPS PRESERVE THE COUNTY'S VISION TO PROTECT THE HORSE FARMS OF THE COUNTY.

56. Under the current Plan Amendments, there is no “transition” to the Farmland Preservation Boundary. Golden Ocala’s current Plan Amendments completely disregard, disclaim, and contradict the statements, representations, and justifications that Golden Ocala previously made to the Board in its 2020 Application, thereby demonstrating the Plan Amendments’ internal inconsistency with the goals, objectives, and policies of the Comprehensive Plan.

57. Golden Ocala employed a bait and switch. The Plan Amendments eliminate the transition and buffer to the Farmland Preservation Area, instead authorizing large-scale, intense commercial uses directly adjacent to the Farmland Preservation Area. This belies any concept of land use compatibility and will effectively destroy the rural character of the surrounding area.

58. Accordingly, the Plan Amendments are incompatible with the Farmland Preservation Area and are therefore internally inconsistent with FLU Policy 5.1.2

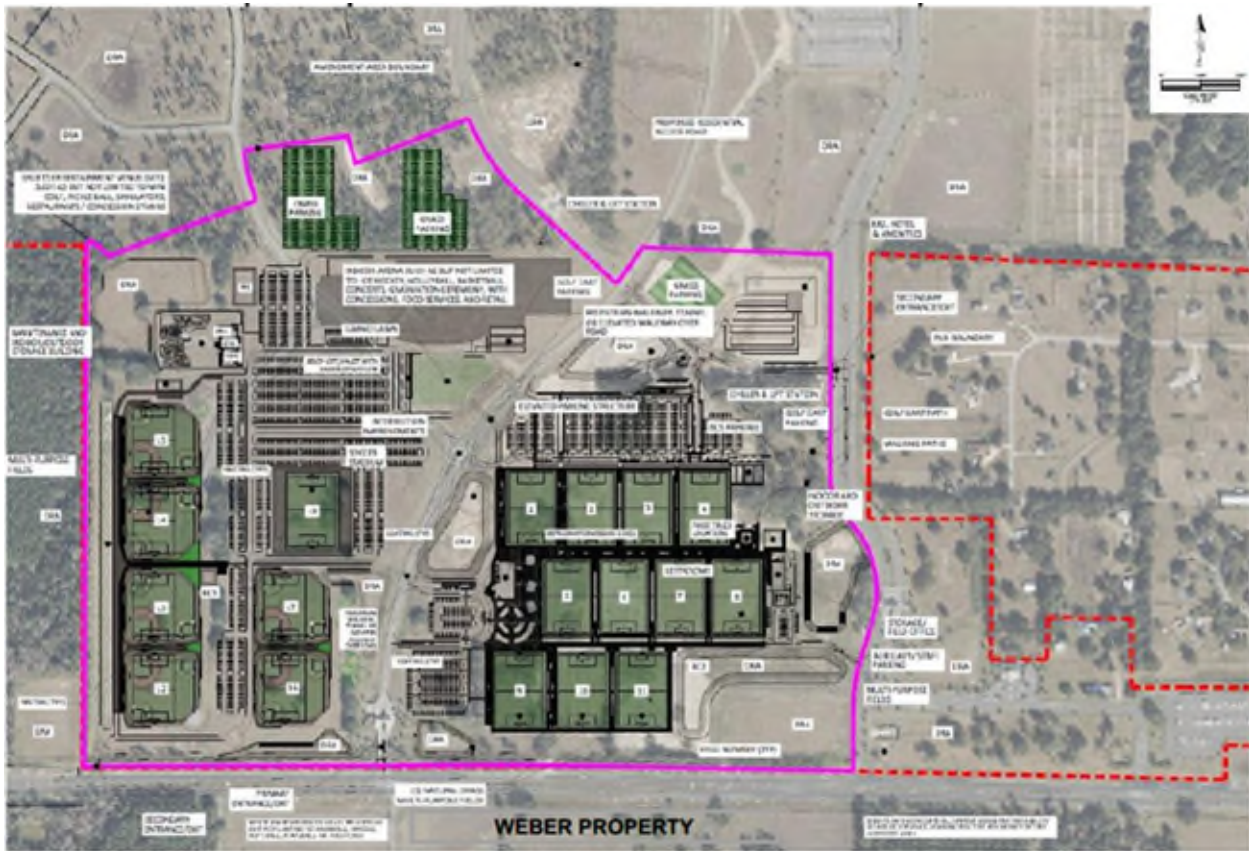
59. The Plan Amendments also violate: (i) FLU Policy 1.1.3, for failing to provide for the continuation of agricultural activities; (ii) FLU Policy 1.1.4, for failing to protect private property rights in land development regulations and governmental actions; (iii) FLU Policy 1.1.6, for failing to require the new development to provide buffering to address compatibility concerns and reduce adverse impacts; (iv) FLU Policy 2.1.28, for allowing “sports facilities” that are inconsistent with the original intent of, and fundamentally alter, the WEC land use designation; (v) FLU Policy 4.1.2, for failing to apply the most stringent regulation (Comprehensive Plan, Zoning, LDC) unless a waiver or variance is permitted; (vi) FLU Policy 6.1.2, for failing to ensure land development is timed with the provision of supporting public facilities and services; (vii) FLU Policy 6.1.7, for failing to design an efficient transportation system of internal circulation and address the traffic impacts of development, including multi-modal transportation for surrounding areas and distribution of traffic flow in the transportation network; (viii) FLU Goal 8, for failing to protect the unique assets, character, and quality of life throughout the County; (ix) FLU Objective 8.1, for failing to encourage the preservation of agriculture as a short-and long-term use of lands and as an asset of the County’s economy; (x) FLU Policy 8.1.4, for failing to protect the integrity of the rural character of the section of roadway along State Road 40; and (xi) FLU Policy 8.2.7, for failing to properly consider the appropriate intensity of development based on the conditions of the site and its location next to Farmland Preservation Area.

III. The Map Amendment Does Not Discourage Urban Sprawl.

60. The Act requires that future land use plan amendments “shall be based upon surveys, studies, and data, regarding the area” including, without limitation, “[t]he character of undeveloped land” and “[t]he discouragement of urban sprawl.” Fla. Stat. § 163.3177(6)(a)(2). The Act similarly provides that “any amendment to the future land use element shall discourage

the proliferation of urban sprawl” and identifies certain “primary indicators” that a plan amendment *does not* discourage urban sprawl, such as where the plan amendment “[f]ails to adequately protect adjacent agricultural areas and activities” or “[f]ails to provide clear separation between rural and urban uses.” Fla. Stat. § 163.3177(9)(a). These standards are incorporated by reference in the County’s Comprehensive Plan, which requires the County to consider the prevention of urban sprawl when reviewing any proposed amendments. *See* FLU Policy 5.1.2(7).

61. As previously addressed, the parcels of land that are the subject of the Map Amendment are located on the southern border of the Sports/Entertainment Property and are *directly adjacent* to the Farmland Preservation Area and Petitioner’s horse farm. The conceptual plan for the Sports/Entertainment Property included in the Rezoning (Ex. C) is shown below.



62. By placing a large-scale, intense commercial use directly adjacent to the Farmland Preservation Area, the Map Amendment fails to adequately protect adjacent agricultural areas and activities.

63. Further, the Map Amendment fails to provide a clear separation between rural and urban land uses, which Golden Ocala previously admitted in its 2020 Application.

64. In Golden Ocala’s 2020 Application, it submitted an “Urban Sprawl Analysis”¹¹ in which it stated, “As amended, the [Golden Ocala] Project will actually create a *transition boundary* from the commercial core of the development to lower density Equestrian Estate housing suitable for equestrian living. *These Equestrian Estate homes will provide a transition to the County’s Farmland Preservation Area Boundary and Rural designated lands.*” (emphasis supplied). The Equestrian Estate residential area that was supposed to provide this transition to the adjacent Farmland Preservation Area and Rural Land *is Golden Ocala’s Sports/Entertainment Property that the County has now approved for high-intensity “sports facilities” and “concert” arenas, stadiums and fields.*

65. The same Urban Sprawl Analysis added that the proposed development was “not a sprawling development but rather a logical extension with *high density/intensity at its core and lower densities and intensities* with equestrian estates, rural densities and equestrian recreation uses *on the edge creating a compatible buffer to the Farmland Preservation Boundary.* The significant decrease in residential units further supports this lack of intense development on the project edges.” (emphasis supplied).

66. The current Map Amendment has no “transition boundary” or “compatible buffer” between the high intensity WEC land use designations and the Farmland Preservation Boundary –

¹¹ A copy of Golden Ocala’s Urban Sprawl Analysis submitted as part of its 2020 Application is attached hereto as **Exhibit “G”** with relevant portions highlighted.

they are directly adjacent to each other. As such, the Map Amendment fails to provide a clear separation between rural and urban land uses.

67. For these reasons, the Plan Amendments fail to discourage the proliferation of urban sprawl as required by Section 163.3177, Florida Statutes and, therefore, are not “in compliance” with the Act.

DISPUTED ISSUES OF MATERIAL FACT

68. The following issues of material fact are in dispute:

- a. Whether the Plan Amendments are based upon relevant and appropriate data and react to the relevant and appropriate data in an appropriate way and to the extent necessary, as required by Section 163.3177(1)(f).
- b. Whether the Plan Amendments render the County’s Comprehensive Plan internally inconsistent and, therefore, not “in compliance” with Section 163.3177(2), Florida Statutes.
- c. Whether the Plan Amendments are not “in compliance” because they are incompatible with the surrounding uses.
- d. Whether the Plan Amendments discourage urban sprawl, protect adjacent agricultural areas and activities, and provide a clear separation between rural and urban uses, as required by Sections 163.3177(6),(9), Florida Statutes.

REQUESTED RELIEF

69. Petitioner respectfully requests the following relief:

- a. That the Division of Administrative Hearings schedule a formal administrative hearing to determine whether the Plan Amendments are “in compliance” with the Act.
- b. That an Administrative Law Judge, following a formal administrative hearing, enter a Recommended Order finding that the Plan Amendments are “not in compliance” with the Act.
- c. That the Administrative Commission enter a Final Order finding the Plan Amendments are “not in compliance” with the Act.
- d. Such additional relief as is consistent with this Petition.

70. The requested relief is just and proper for the reasons set forth in this Petition and in accordance with Chapters 120 and 163, Florida Statutes, including Sections 120.57, 120.569, 163.3177, and 163.3184, Florida Statutes, and the corresponding goals, objectives, and polices of the Marion County Comprehensive Plan.

Dated: April 17, 2026.

/s/Shane T. Costello

Scott A. McLaren

Florida Bar No. 414816

Shane T. Costello

Florida Bar No. 068538

Fred C. Marshall, II

Florida Bar No. FBN 119284

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Secondary: penny.lalonde@hwlaw.com

Attorneys for Petitioner

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 17, 2026, a true and correct copy of the foregoing was filed with Division of Administrative Hearings via e-service, with a copy served via e-mail and U.S. Mail on the persons listed below.

Matthew Minter,
Marion County Attorney
601 SE 25th Ave.
Ocala, FL 34471
Matthew.minter@marionfl.org

Board of County Commissioners,
Marion County
c/o Carl Zalak, III, Chairman
601 SE 25th Ave
Ocala, FL 34471
Carl.zalak@marionfl.org

Gregory Harrell
Marion County Clerk of Court & Comptroller
PO Box 1030
Ocala, FL 34478
gharrell@marioncountyclerk.org

/s/Shane T. Costello
Attorney

STATE OF FLORIDA
DIVISION OF ADMINISTRATIVE HEARINGS

Charlotte C. Weber, Individually and
as Trustee of the Charlotte C. Weber
2001 Revocable Trust,

Petitioner,

DOAH Case No.

v.

Marion County, Florida,

Respondent.

_____ /

EXHIBIT "A"

TO

PETITION FOR FORMAL ADMINISTRATIVE HEARING

ORDINANCE NO. 26 - 09

AN ORDINANCE OF THE BOARD OF COUNTY COMMISSIONERS OF MARION COUNTY, FLORIDA; PROVIDING FOR FINDINGS; ADOPTING AMENDMENT 25-L01; LARGE-SCALE TEXT AMENDMENT TO THE FUTURE LAND USE ELEMENT OF THE MARION COUNTY COMPREHENSIVE PLAN:

25-L01, GOLDEN OCALA EQUESTRIAN LAND, LLC
FUTURE LAND USE ELEMENT TEXT AMENDMENTS:
POLICY 2.1.28 – WORLD EQUESTRIAN CENTER (DEFINITION),
TABLE 2-1 – SUMMARY OF FUTURE LAND USE DESIGNATIONS,
POLICY 10.5.1 – GOLDEN OCALA,
FUTURE LAND USE MAP SERIES MAP 15.h – GOLDEN OCALA;

PURSUANT TO CHAPTER 163, FLORIDA STATUTES; PROVIDING FOR FINDINGS; PROVIDING FOR APPEALS; PROVIDING FOR SEVERABILITY; PROVIDING FOR CONFLICTS; AND PROVIDING AN EFFECTIVE DATE.

WHEREAS, Section 125.01(1)(g), Florida Statutes, empowers the Board of County Commissioners of Marion County, Florida (“Board”) to prepare and enforce comprehensive plans to plan for and manage the development of the County; and

WHEREAS, Sections 163.3161 through 163.3215, Florida Statutes, the Community Planning Act, empowers and requires the Board of County Commissioners of Marion County to (a) plan for the County’s future development and growth; (b) adopt and amend comprehensive plans, or elements or portions thereof, to guide the future growth and development of the County; and

WHEREAS, the Marion County Planning & Zoning Commission, acting as the Local Planning Agency, conducted a properly noticed public hearing on June 30, 2025, at 5:30 p.m., to consider Amendment No. 25-L01. The Planning & Zoning Commission considered the Growth Services Department’s recommendation, received public comment, and made recommendations to the Board regarding the Amendment, including findings of facts related to:

1. Whether the granting of the amendment will not adversely affect the public interest.
2. Whether the proposed amendment is compatible with land uses in the surrounding areas.
3. Whether the proposed amendment is consistent with Chapter 163, Florida Statutes, and the Marion County Comprehensive Plan, and ^

WHEREAS, the Board conducted a properly noticed transmittal public hearing on July 21, 2025, at 1:30 p.m., to consider Amendment No. 25-L01, the Growth Services Department’s recommendation, the Planning and Zoning Commission’s recommendation, public comment received, and acted to transmit the Amendment to the Florida Department of Commerce (Florida Commerce) and other designated agencies for review consistent with Chapter 163.3184, Florida Statutes, and

WHEREAS, Florida Commerce and other reviewing agencies received Amendment 25-L01, and provided comments and one objection regarding the proposed Amendment, and

WHEREAS, the Board conducted a properly noticed adoption public hearing on March 18, 2026, at 1:30 p.m., to consider Amendment No. 25-L01, the Growth Services Department’s recommendation, the Planning and Zoning Commission’s recommendation, the agency transmittal review responses received (if any), and public comment received, and acted to adopt the Amendment.

WHEREAS, the Board of County Commissioners of Marion County, Florida, further considered all oral and written comments received during said public hearing, including the data and analysis packages; and

NOW, THEREFORE BE IT ORDAINED by the Board of County Commissioners of Marion County, Florida:

SECTION 1. LARGE-SCALE AMENDMENT APPROVAL. The Board hereby approves the below-listed large-scale text amendment and authorizes the necessary amendment to Comprehensive Plan Future Land Use Element text attached hereto as Exhibits “A,” “B,” “C,” & “D” and by this reference made part hereof, based on affirmative findings that the Amendment is compatible with the surrounding land uses, consistent with Chapter 163, Florida Statutes, and the Marion County Comprehensive Plan, and is not adverse to the public interest:

Amend . No.	Applicant	PROPOSED LARGE-SCALE COMPREHENSIVE PLAN TEXT AMENDMENT
25 -L01	Golden Ocala Equestrian Land, LLC	<p><i>Future Land Use Element Policy 2.1.28 - World Equestrian Center (changes to the future land use designation definition) with corresponding change to Future Land Use Element Table 2-1 – Summary of Future Land Use Designations; and</i></p> <p><i>Future Land Use Element Policy 10.5.1 - Golden Ocala (changes to the non-residential uses and maximum entitlements) with corresponding change to Future Land Use Map Series Map 15.h – Golden Ocala</i></p>

SECTION 2. APPEALS. Any affected person may file a petition with the Division of Administrative Hearings pursuant to Sections 120.569 and 120.57, Florida Statutes, to request a hearing to challenge the compliance of this large-scale amendment with Chapter 163, Part II, Florida Statutes, within 30 days following the adoption date of this ordinance.

SECTION 3. SEVERABILITY. If any provision or portion of this ordinance is declared by any court of competent jurisdiction to be void, unconstitutional, or unenforceable, then all remaining portions and provisions of this ordinance shall remain in full force and effect.

SECTION 4. CONFLICTS. In the event of any conflict or inconsistency between the text of this Amendment, and any other county ordinance or part thereof, the provisions of this amendment shall prevail to the extent of such conflict or inconsistency

SECTION 5. EFFECTIVE DATE. The effective date of this plan amendment, if the amendment is not timely challenged, shall be the date the state land planning agency posts a notice of intent determining that this amendment is in compliance. If the amendment is timely challenged, or if the state land planning agency issues a notice of intent determining that this amendment is not in compliance, this amendment shall become effective on the date the state land planning agency or the Administration Commission enters a final order determining this

adopted amendment to be in compliance. No development orders, development permits, or development dependent on this amendment may be issued or commence before it has become effective.

SECTION 6. CERTIFIED COPY. A certified copy of this ordinance shall be filed with the Department of State by the Clerk of the Circuit Court and shall take effect upon filing with the Department of State, subject to the limitation set forth above.

SECTION 7. COPY ON FILE. This original ordinance shall be filed with the Clerk of the Circuit Court, and a certified copy of this ordinance shall be on file in the Marion County Growth Services Department/Planning & Zoning Division for public inspection.

DULY ADOPTED with a quorum present and voting, by the Board of County Commissioners of Marion County, Florida, this 18th day of March, 2026.

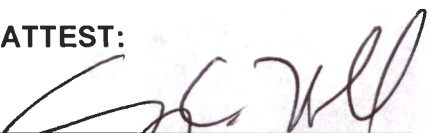
**BOARD OF COUNTY COMMISSIONERS
MARION COUNTY, FLORIDA**



CARL ZALAK III, CHAIRMAN

RECEIVED NOTICE FROM SECRETARY OF STATE ON
MARCH 27, 2026 ADVISING THAT ORDINANCE WAS
FILED ON MARCH 27, 2026.

ATTEST:



GREGORY C. HARRELL, CLERK

APPROVED AS TO LEGAL FORM AND SUFFICIENCY



MATTHEW MINTER, COUNTY ATTORNEY

EXHIBIT “A”

Text Amendment to FLUE Policy 2.1.28

[Green underline text is new/addition text. Red strike-out text is deletion.]

Policy 2.1.28: World Equestrian Center (WEC)

This land use is intended to provide for the development of the Golden Ocala World Equestrian Center, a regional attraction consisting of equestrian-related improvements (including indoor and outdoor arenas, barns, show rings, etc.), sports facilities and other improvements to support the horse community and community in general. This designation also allows for commercial uses (including retail, hotel, office, community uses and business opportunities), recreational uses, residential uses, recreational vehicle parks (“RVP”) and mixed uses. Any commercial uses on World Equestrian Center (“WEC”) designated lands in the Rural Area (i.e., outside the UGB) shall be limited to equestrian-related uses associated with the World Equestrian Center. Any hotels or other commercial uses that are not permitted in the Rural Lands Future Land Use designation shall be prohibited on WEC designated lands in the Rural Area (i.e., outside the UGB); provided, however, Recreational Vehicle Parks and clubhouse spaces may be allowed if expressly permitted by a FLUE Policy applicable to a parcel of real property assigned the WEC designation. As used herein, the term “equestrian-related use” shall mean a land use that is principally rural and equestrian in character and associated with and supportive of equestrian sports. Examples of equestrian-related uses include polo fields, equestrian arenas, equestrian instruction facilities, veterinary clinics, farriers (non-mobile), stables and barns, and feed stores and tack shops. Any and all accessory uses to equestrian-related uses shall be directly ancillary and incidental to such equestrian related use and shall be located on the same lot or parcel as the principal equestrian-related use. Examples of sports facilities include softball fields, soccer fields, indoor and outdoor arenas, and other recreational uses. The maximum density for residential uses (i) within the Urban Area shall be four (4) dwelling units per one (1) gross acre; and (ii) within the Rural Area shall be one (1) dwelling unit per ten (10) gross acres. The maximum intensity for non-residential uses (i) within the Urban Area (inside the UGB) shall be a Floor Area Ratio of 0.5, as further defined by the LDC; and (ii) within the Rural Area (outside the UGB) shall be a Floor Area Ratio of 0.35, as further defined by the LDC. This land use designation is allowed in the Urban and Rural Area and is limited to the lands described in Exhibit “C” to Ordinance No. 20-36 dated December 16, 2020 (as may be subsequently amended); all such lands shall be developed under a single-unified Planned Unit Development (PUD) zoning district classification on and over such land, consistent with Marion County’s Land Development Code (LDC) and described in Exhibits “A1” and “A2” to Ordinance No. 22-26 dated June 21, 2022; all such lands shall be developed under a single-unified Planned Unit Development (PUD) zoning district classification on and over such land, consistent with Marion County’s Land Development Code (LDC).

EXHIBIT "B"
Amendment to FLUE Table 2-1
(Reflects Amendment to FLUE Policy 2.1.28)

[Green underline text is new/addition text. Red strike-out text is deletion.]

Future Land Use Element Table 2-1: Summary of Future Land Use Designations*

FLU	DENSITY	FAR	USES
RURAL AREAS (Outside UGB)			
AGRICULTURAL USES			
Rural Land (RL)	0 – 1 du/10 ac	N/A	Agriculture, residences associated with agriculture, or Conservation.
NON-RESIDENTIAL / MIXED USES			
Rural Activity Center (RAC)	0 - 2 du/ac	0 – 0.35	Office, Commercial, Public, Recreation, Residential
URBAN AREAS (Inside and Outside UGB)			
RESIDENTIAL USES			
Low Residential (LR)	0 - 1 du/ac	N/A	Residential, Public, Recreation, Conservation
Medium Residential (MR)	1 – 4 du/ac	N/A	Residential, Public, Recreation, Conservation
High Residential (HR)	4 - 8 du/ac	N/A	Residential, Public, Recreation, Conservation
Urban Residential (UR)	8 - 16 du/ac	N/A	Residential, Public, Recreation, Conservation, Commercial (accessory)
NON-RESIDENTIAL / MIXED USES			
Commercial (COM)	0 – 8 du/ac	0 – 1.0	Office, Commercial, Public, Recreation, Residential, Campgrounds, Recreational Vehicle Park (RVP)
Employment Center (EC)	0 - 16 du/ac	0 – 2.0	Office, Commercial, Industrial, Public, Recreation, Residential, Campgrounds, RVP
Commerce District (CD)	N/A	0 – 2.0	Office, Commercial, Industrial, Public
ALLOWED IN RURAL AND URBAN AREAS (Inside or Outside UGB)			
NON-RESIDENTIAL / MIXED USES			
Public (P)	N/A	0 – 1.0	Public, Office, Commercial, Recreation, Golf Course
Preservation (PR)	N/A	N/A	Preservation, Conservation
Municipality (M)	N/A	N/A	Municipality
World Equestrian Center (WEC)**	<i>Rural Area (Outside UGB)</i>		
	0-1 du/10 ac (Rural Area)	0 – 0.35 for Rural Areas (outside the UGB)	Residential, World Equestrian Center with equestrian-related uses per FLUE Policy 10.5.1 for property depicted on FLUMS Map 15h <u>(for Golden Ocala)</u> Residential, World Equestrian Center with equestrian related use (RVP) and clubhouse per FLUE Policy 10.6.1 (for Jockey Club)
	<i>Urban Area (Inside UGB)</i>		
	0-4 du/ac (Urban Area)	0 - 0.50 for Urban Areas (inside the UGB)	World Equestrian Center, <u>Sports Facilities</u> , Office, Commercial, Public, Recreation, Residential, Recreational Vehicle Park (RVP)

EXHIBIT "C"
Text Amendment to FLUE Policy 10.5.1

REVISED FLUE POLICY 10.5.1: GOLDEN OCALA "DRI" POLICY
Future Land Use Element Policy 10.5.1: Golden Ocala

[Green underline text is new/addition text. Red strike-out text is deletion.]

[Editor Note: Prior Policy 10.5.1 is deleted in its entirety, being replaced and superseded by this "new" policy.]

This concerns the following Future Land Use Map Amendments - (a) Future Land Use Map (FLUM) Amendment 2016-L04; (b) Future Land Use Map (FLUM) Amendments 2017-L02 and 2017-D05; ~~and~~ (c) FLUM Amendment 2020-D01 and FLUM Amendment 2020-L02; (d) FLUM Amendment 2025-L01 and FLUM Amendment 2025-L02 concerning approximately 4,276.21 acres (the "Project" or "Golden Ocala"). The land use and development potential of the Project is hereby limited and governed by the following conditions:

1. The Golden Ocala project general land uses and boundary are identified as part of the Marion County Future Land Use Map Series (FLUMS) as identified on Map 15.h.
2. Golden Ocala is a mixed-use development composed of single family, multi-family (includes condominiums), commercial, hotel, recreation, RV units, equestrian facilities, sports facilities, and other uses to support the horse community, the Golden Ocala project and the community in general.
3. The maximum project entitlements are as follows:

RESIDENTIAL HOUSING	
Low Residential	400
Medium Residential (including original Golden Ocala PUD)	1103
Equestrian Estate	300
High Residential	408
Condominium	170
Rural	16
Total Housing Units	2,397
NON-RESIDENTIAL	
Commercial	4,000,000 square feet
Equestrian Facilities	13,500 seats <u>210 acres</u>
<u>Expo and Indoor Sports Facilities</u>	<u>30 acres</u>
<u>Outdoor Sports Facilities</u>	<u>90 acres</u>
Hotel	1, 3 <u>6</u> 50 rooms
Recreational Vehicle	280 units (does not include unoccupied parking areas)

4. The commercial and other non-residential entitlements may be used for any of the non-residential uses permitted by Marion County in the Commercial and World Equestrian Center future land use categories. A land use tradeoff mechanism will also be included within the County's PUD approval for this Project, and will apply to the entire Project boundary. The land use conversion table will allow for a land use to exceed the Project entitlements above as long as another land use is reduced through the conversion matrix to ensure there is no increase in development impacts. The conversion table will also allow for conversion of the uses identified above through local approval and thus, without the requirement for a comprehensive plan amendment.
5. Concerning the Marion County's Concurrency Management System:
 - A. The portion of the Project that was the subject of FLUM Amendments 2016-L04 and 2017- D05 is subject to the provisions of a Development Agreement Concerning Concurrency, Impact Fee Credits And Other Matters for Golden Ocala as recorded in OR Book 8791, Page 105, public records of Marion County, Florida (the "2018 Concurrency Agreement").
 - B. Concerning the portion of the Project that is the subject of FLUM Amendments 2020-D01 and 2020-L02, [FLUM Amendments 2025-L01 and 2025-L02](#) neither the approval of this development project's site for future land use designation, or the approval of this policy shall be deemed a final local development order and the development is not considered, or entitled to, being certified for concurrency under Marion County's Concurrency Management System (LDC Article 1, Division 8). The developer shall address and comply with Marion County's Concurrency Management System, including providing for proportionate share for transportation improvements consistent with Sections 163.3180 and 380.06, Florida Statutes, upon proceeding through Marion County's subsequent development review process as contained within the Marion County Land Development Code (LDC Article 2, etc.). Such compliance may be evidenced by an amendment to the 2018 Concurrency Agreement.
6. No Equestrian Estate lot created shall be less than three (3) acres in size measured exclusive of any right-of-way or access easements (except to the extent such access easements provide access between lots and platted streets, are designed to permit the use of shared driveways to provide such access, or are designated easements for utilities or equestrian trails).
7. The commercial, common and non-residential areas, World Equestrian Center and individual lots and homes shall utilize water conservation techniques. Such techniques may include indoor, irrigation and landscaping practices as selected by the Developer, required certifications for irrigation contractors working within the development, wastewater contribution for municipal reuse, maximum irrigable areas, or other landscape and vegetative requirements.
8. Development of:
 - A. Commercial, condominium, RV, low density residential lots ~~north of US 27~~ (other than those developed as Equestrian Estate Lots [north of US 27](#)), medium density residential lots , the Equestrian Facility developments, [and the sports facilities](#) shall be served by central potable water and central sanitary sewer service.
 - B. Equestrian Estate lots:
 - 1) Located South of US 27, shall be served by central potable water or central sanitary sewer services; and

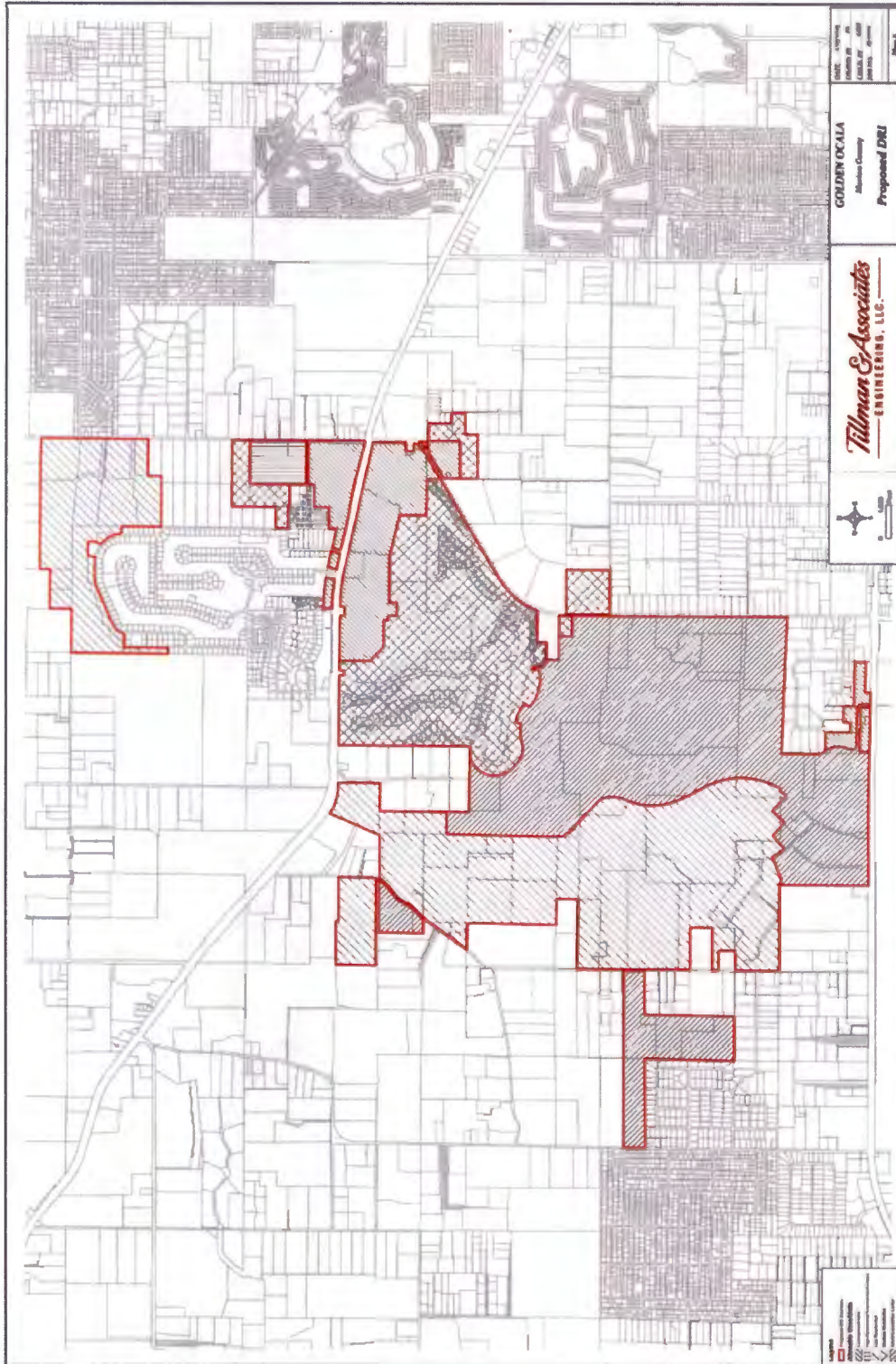
EXHIBIT “C” CONTINUED
Text Amendment to FLUE Policy 10.5.1

- 2) Located North of US 27, may, at the option of the developer, be served by (a) wells or on-site sewage treatment and disposal systems (OSTDS) provided that the PUD for any such lots that are served by OSTDS shall contain provisions designed to reduce total nitrogen effluent concentration; or (b) by central potable water or central sanitary sewer services to the foregoing provisions concerning wells and OSTDS are to provide a transition from the urbanized area to rural, which are exceptions to Future Land Use Element Policies 3.1.1, 6.1.3 and 6.1.5, Sanitary Sewer Element Policies 1.2.6, 1.4.1 and 1.4.7 and Potable Water Element Policy 1.7.1.; and other provisions of this plan requiring central water and sewer.
9. Direct vehicular access to NW 100th Avenue south of the northwest quarter of the southwest quarter of Section 11, Township 15 Range 20 is prohibited.
10. This Policy supersedes, amends, restates and replaces historic Objective 6 and Policy 10.6.1 adopted pursuant to FLUM Amendment 2017-L02 and Policy 10.5.1 adopted pursuant to FLUM Amendment 2017-D05 (as modified by the Settlement Agreement concerning Golden Ocala Approvals dated February 20, 2018 and approved by Marion County on such date) and FLUM Amendment 2022-L02.

EXHIBIT "D"

Text Amendment to FLUE Map 15.h – Golden Ocala

[The following Map 15h hereby repeals and replaces prior Map 15h.]



STATE OF FLORIDA
DIVISION OF ADMINISTRATIVE HEARINGS

Charlotte C. Weber, Individually and
as Trustee of the Charlotte C. Weber
2001 Revocable Trust,

Petitioner,

DOAH Case No.

v.

Marion County, Florida,

Respondent.

_____ /

EXHIBIT "B"

TO

PETITION FOR FORMAL ADMINISTRATIVE HEARING

ORDINANCE NO. 26-10

AN ORDINANCE OF THE BOARD OF COUNTY COMMISSIONERS OF MARION COUNTY, FLORIDA; ADOPTING THE FOLLOWING LARGE-SCALE AMENDMENT TO THE FUTURE LAND USE MAP SERIES (FLUMS) OF THE MARION COUNTY COMPREHENSIVE PLAN:

**25-L02, GOLDEN OCALA EQUESTRIAN LAND, LLC., ET. AL.
FUTURE LAND USE DESIGNATION CHANGES AS FOLLOWS:
±251 ACRES, INCLUDING ALL, OR A PORTION OF,
THE FOLLOWING PARCELS**

21069-007-01, 21081-000001, 21081-001-00, 21081-048-00, 21087-001-00, 21087-001-02, 21065-000-00, 21069-010-03;

**FROM LOW RESIDENTIAL (LR)
TO WORLD EQUESTRIAN CENTER (WEC)**

PURSUANT TO CHAPTER 163, FLORIDA STATUTES; PROVIDING FOR FINDINGS; PROVIDING FOR APPEALS; PROVIDING FOR SEVERABILITY; PROVIDING FOR CONFLICTS; AND PROVIDING AN EFFECTIVE DATE.

WHEREAS, the Board of County Commissioners of Marion County, Florida (Board), is responsible for and has established the Comprehensive Plan Future Land Use Designation of parcels of property in the unincorporated area of Marion County as reflected in the Future Land Use Map Series, and

WHEREAS, the Board has authority to approve large-scale amendments to the Comprehensive Plan consistent with the provisions of Section 163.3184, Florida Statutes, and

WHEREAS, the property owner submitted Application No. 25-L02 for a large-scale amendment to the Comprehensive Plan and such application identifies the subject property by suitable legal description, or by parcel numbers, and such identification of property is hereby incorporated into this ordinance by reference, and the property description, illustration, and map are attached hereto as Exhibits "A1," "A2," and "B," and

WHEREAS, the Marion County Planning & Zoning Commission, acting as the Local Planning Agency, conducted a properly noticed public hearing on June 30, 2025, at 5:30 p.m., to consider Amendment No. 25-L02. The Planning & Zoning Commission considered the Growth Services Department's recommendation, received public comment, and made recommendations to the Board regarding the Amendment, including findings of facts related to:

1. Whether the granting of the amendment will not adversely affect the public interest.
2. Whether the proposed amendment is compatible with land uses in the surrounding areas.
3. Whether the proposed amendment is consistent with Chapter 163, Florida Statutes and the Marion County Comprehensive Plan, and

WHEREAS, the Board conducted a properly noticed transmittal public hearing on July 21, 2025, at 1:30 p.m., to consider Amendment No. 25-L02, the Growth Services Department's recommendation, the Planning and Zoning Commission's recommendation, public comment received, and acted to transmit the Amendment to the Florida Department Commerce (Florida Commerce) and other designated agencies for review consistent with Chapter 163.3184, Florida Statutes, and

WHEREAS, Florida Commerce and other review agencies received Amendment 25-L02, and provided comments and one objection regarding the proposed Amendment, and

WHEREAS, the Board conducted a properly noticed adoption public hearing on March 18, 2026, at 1:30 p.m., to consider Amendment No. 25-L02, the Growth Services Department's recommendation, the Planning and Zoning Commission's recommendation, the agency transmittal review responses received (if any), and public comment received, and acted to adopt the Amendment.

NOW, THEREFORE BE IT ORDAINED by the Board of County Commissioners of Marion County, Florida:

SECTION 1. LARGE-SCALE AMENDMENT APPROVAL. The Board hereby approves the below-listed large-scale amendment and authorizes the necessary amendment to Comprehensive Plan Future Land Use Element Map #1 "*Marion County 2045 Future Land Use Map*," with Exhibits "A" and "B" attached hereto and by this reference made part hereof, based on affirmative findings that the Amendment is compatible with the surrounding land uses, consistent with Chapter 163, Florida Statutes, and the Marion County Comprehensive Plan, and is not adverse to the public interest:

**25-L02, GOLDEN OCALA EQUESTRIAN LAND, LLC., ET. AL.
FUTURE LAND USE DESIGNATION CHANGES AS FOLLOWS:
±251 ACRES, INCLUDING ALL, OR A PORTION OF,
THE FOLLOWING PARCELS**

21069-007-01, 21081-000001, 21081-001-00, 21081-048-00, 21087-001-00, 21087-001-02, 21065-000-00, 21069-010-03;

**FROM LOW RESIDENTIAL (LR)
TO WORLD EQUESTRIAN CENTER (WEC)**

SECTION 2. APPEALS. Any affected person may file a petition with the Division of Administrative Hearings pursuant to Sections 120.569 and 120.57, Florida Statutes, to request a hearing to challenge the compliance of this large-scale amendment with Chapter 163, Part II, Florida Statutes, within 30 days following the adoption date of this ordinance.

SECTION 3. SEVERABILITY. If any provision or portion of this ordinance is declared by any court of competent jurisdiction to be void, unconstitutional or unenforceable, then all remaining portions and provision of this ordinance shall remain in full force and effect.

SECTION 4. CONFLICTS. In the event that any other Ordinances are in conflict with this Ordinance, the provisions of this Ordinance shall prevail with respect to this property.

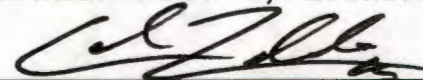
SECTION 5. EFFECTIVE DATE. The effective date of this plan amendment, if the amendment is not timely challenged, shall be the date the state land planning agency posts a notice of intent determining that this amendment is in compliance. If the amendment is timely challenged, or if the state land planning agency issues a notice of intent determining that this amendment is not in compliance, this amendment shall become effective on the date the state land planning agency or the Administration Commission enters a final order determining this adopted amendment to be in compliance. No development orders, development permits, or development dependent on this amendment may be issued or commence before it has become effective.

SECTION 6. CERTIFIED COPY. A certified copy of this ordinance shall be filed with the Department of State by the clerk and shall take effect upon filing with the Department of State, subject to the limitation set forth above.

SECTION 7. COPY ON FILE. This original ordinance shall be filed with the Clerk of the Circuit Court, and a certified copy of this ordinance shall be on file in the Marion County Growth Services Department/Planning & Zoning Division for public inspection.

DULY ADOPTED with a quorum present and voting, by the Board of County Commissioners of Marion County, Florida, this 18th day of March, 2026.

**BOARD OF COUNTY COMMISSIONERS
MARION COUNTY, FLORIDA**



CARL ZALAK, III, CHAIRMAN

RECIEVED NOTICE FROM SECRETARY OF STATE
ON MARCH 27, 2026 ADVISING THAT ORDINANCE
WAS FILED ON MARCH 27, 2026.

ATTEST:


GREGORY C. HARRELL, CLERK

APPROVED AS TO LEGAL FORM AND SUFFICIENCY



MATTHEW MINTER, COUNTY ATTORNEY

EXHIBIT "A"

Legal Description

WEC SPORTS COMPLEX P.U.D. REVISION LEGAL DESCRIPTION

A PARCEL OF LAND LYING IN LOTS 1 THROUGH 20, INCLUSIVE, AND LOT 48, AND A PORTION OF TRACT "A", WORLD EQUESTRIAN ESTATES PHASE 1, ACCORDING TO THE PLAT THEREOF, RECORDED IN PLAT BOOK 14, PAGE 86, PUBLIC RECORDS OF MARION COUNTY, FLORIDA, AND A PORTION OF THE NORTHEAST 1/4 OF SECTION 14, AND A PORTION OF THE SOUTHEAST 1/4 OF SECTION 11, AND A PORTION OF THE NORTHWEST 1/4 OF SECTION 13, ALL BEING IN TOWNSHIP 15 SOUTH, RANGE 20 EAST, MARION COUNTY, FLORIDA, BEING MORE PARTICULARLY DESCRIBED AS FOLLOWS:

BEGIN AT THE NORTHWEST CORNER OF SAID NORTHEAST 1/4 OF SECTION 14; THENCE N36°58'36"E ALONG A NORTH LINE OF LOT 17 OF SAID PLAT, 28.55 FEET; THENCE CONTINUE ALONG A NORTH LINE OF SAID LOT 17, S54°14'14"E, 64.99 FEET; THENCE CONTINUE ALONG A NORTH LINE OF SAID LOT 17, S47°03'40"E, 60.99 FEET TO THE WEST CORNER OF LOT 20, OF SAID PLAT; THENCE DEPARTING SAID NORTH LINE OF LOT 17, PROCEED N69°16'37"E, ALONG THE NORTH LINE OF SAID LOT 20 AND ITS NORTHEASTERLY EXTENSION THEREOF, 796.97 FEET TO A POINT ON AN EASTERLY LINE OF SAID PLAT, SAID POINT ALSO BEING ON THE ARC OF A NON-TANGENT CURVE, CONCAVE EASTERLY, HAVING A RADIUS OF 1170.00 FEET AND A CENTRAL ANGLE OF 12°48'07"; THENCE NORTHERLY ALONG SAID LINE AND THE ARC OF SAID CURVE, AN ARC LENGTH OF 261.42 FEET (CHORD BEARING AND DISTANCE OF N14°19'20"W, 260.88 FEET) TO THE SOUTHWEST CORNER OF LOT 47 OF AFORESAID PLAT; THENCE N82°04'43"E ALONG THE SOUTH LINE OF SAID LOT 47, A DISTANCE OF 532.39 FEET TO THE SOUTHEAST CORNER THEREOF; THENCE S16°14'28"E, 143.88 FEET; THENCE N68°26'23"E, 616.32 FEET TO A POINT ON THE ARC OF A NON-TANGENT CURVE CONCAVE NORTHEASTERLY, HAVING A RADIUS OF 1030.00 FEET AND A CENTRAL ANGLE OF 25°19'33"; THENCE SOUTHEASTERLY ALONG THE ARC OF SAID CURVE, AN ARC LENGTH OF 455.28 FEET (CHORD BEARING AND DISTANCE OF S34°13'23"E, 451.58 FEET); THENCE S46°53'10"E, 678.36 FEET TO A POINT ON THE ARC OF A NON-TANGENT CURVE CONCAVE NORTHWESTERLY, HAVING A RADIUS OF 2170.00 FEET AND A CENTRAL ANGLE OF 6°00'36"; THENCE NORTHEASTERLY ALONG THE ARC OF SAID CURVE, AN ARC LENGTH OF 227.62 FEET (CHORD BEARING AND DISTANCE OF N35°39'55"E, 227.51 FEET) TO A POINT ON THE NORTH LINE OF THE NORTHWEST 1/4 OF AFORESAID SECTION 13; THENCE S87°49'01"E, ALONG SAID NORTH LINE, 959.25 FEET; THENCE DEPARTING SAID NORTH LINE, PROCEED S00°19'42"W, 1101.09 FEET TO THE POINT OF CURVATURE OF A CURVE CONCAVE EASTERLY, HAVING A RADIUS OF 362.00 FEET AND A CENTRAL ANGLE OF 41°55'17"; THENCE SOUTHERLY ALONG THE ARC OF SAID CURVE, AN ARC LENGTH OF 264.86 FEET (CHORD BEARING AND DISTANCE OF S20°37'57"E, 258.99 FEET); THENCE S41°35'35"E, 22.26 FEET TO THE POINT OF CURVATURE OF A CURVE CONCAVE WESTERLY, HAVING A RADIUS OF 519.00 FEET AND A CENTRAL ANGLE OF 58°07'15"; THENCE SOUTHERLY ALONG THE ARC OF SAID CURVE, AN ARC LENGTH OF 526.47 FEET (CHORD BEARING AND DISTANCE OF S12°31'58"E, 504.19 FEET); THENCE S16°31'40"W, 229.49 FEET TO THE POINT OF CURVATURE OF A CURVE CONCAVE EASTERLY, HAVING A RADIUS OF 750.00 FEET AND A CENTRAL ANGLE OF 16°12'25"; THENCE SOUTHERLY ALONG THE ARC OF SAID CURVE, AN ARC LENGTH OF 212.15 FEET (CHORD BEARING AND DISTANCE OF S08°25'27"W, 211.44 FEET); THENCE S00°19'14"W, 337.09 FEET TO A POINT ON THE NORTH RIGHT-OF-WAY LINE OF WEST HIGHWAY No. 40 (200 FEET WIDE); THENCE N88°52'18"W, ALONG SAID RIGHT-OF-WAY LINE, 1289.17 FEET TO THE POINT OF CURVATURE OF A CURVE CONCAVE SOUTHERLY, HAVING A RADIUS OF 22951.32 FEET AND A CENTRAL ANGLE OF 1°15'22"; THENCE WESTERLY ALONG THE ARC OF SAID CURVE AND CONTINUE ALONG SAID RIGHT-OF-WAY LINE, AN ARC LENGTH OF 503.17 FEET (CHORD BEARING AND DISTANCE OF N89°36'24"W, 503.16 FEET); THENCE CONTINUE ALONG SAID RIGHT-OF-WAY LINE, S89°50'55"W 2111.24 FEET TO THE INTERSECTION WITH THE WEST LINE OF AFORESAID NORTHEAST 1/4 OF SECTION 14; THENCE DEPARTING SAID RIGHT-OF-WAY LINE, PROCEED N00°20'28"E ALONG SAID WEST LINE, 2644.25 FEET TO THE POINT OF BEGINNING.

CONTAINING 250.86 Acres, MORE OR LESS.

EXHIBIT "A" CONTINUED

Sketch of Description

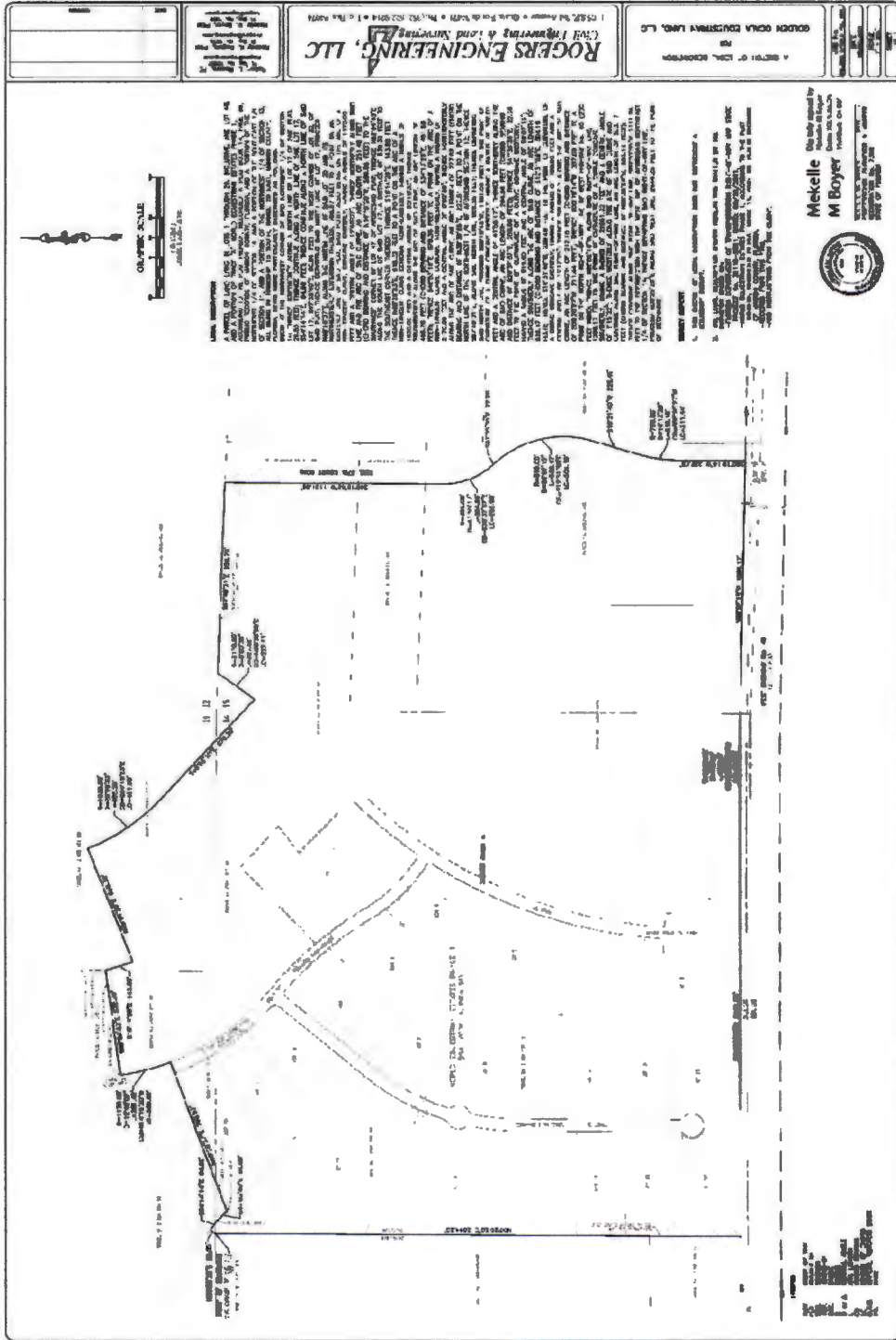
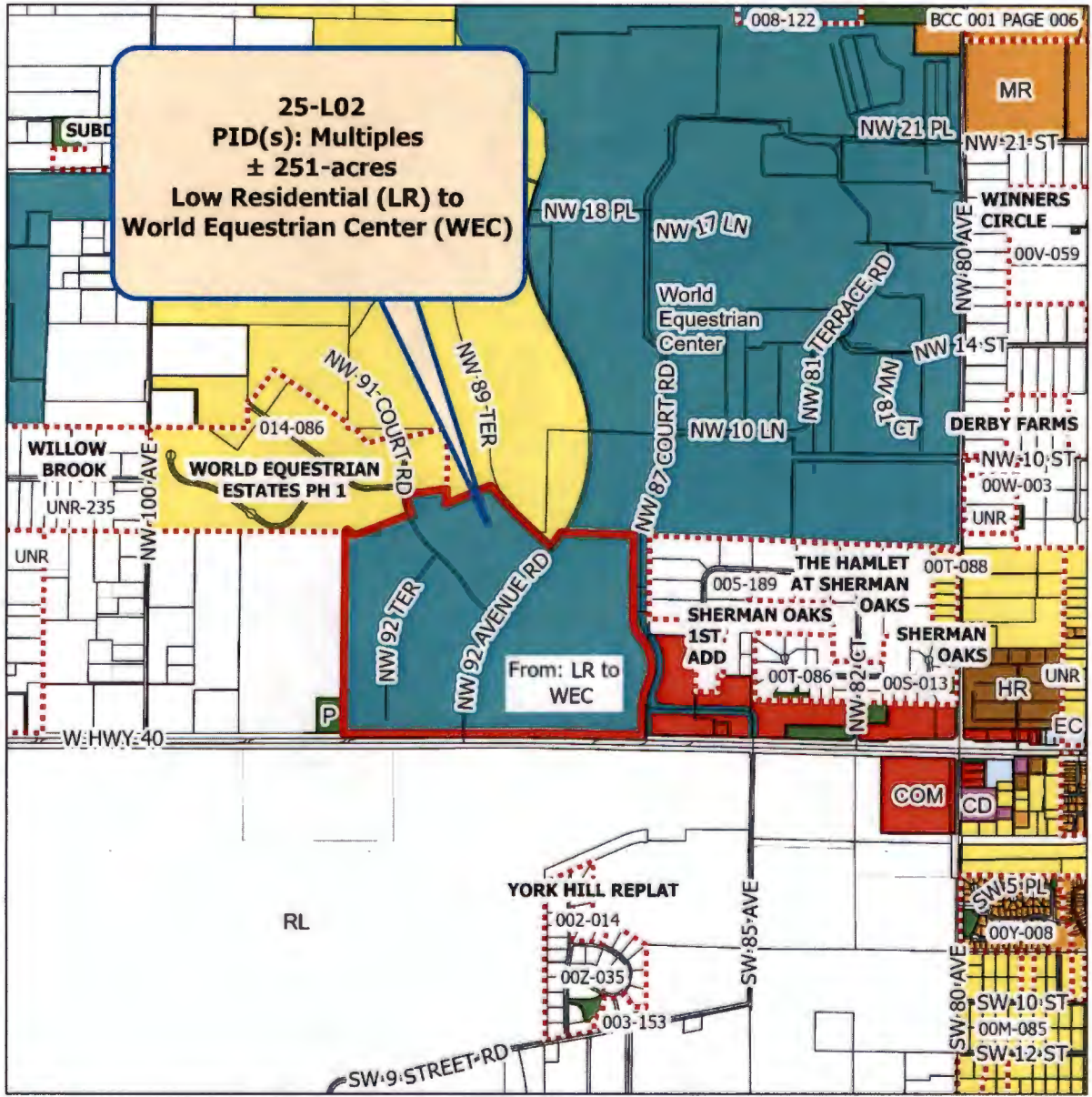


EXHIBIT "B"

FLUE MAP AMENDMENT



Golden Ocala Equestrian Land LLC	Subdivisions	Parcels	0 1,000 2,000 US Feet
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Future Land Use Designation	Rural Activity Center (0 - 2 du/ac; FAR 0.35)	Preservation (N/A; N/A)
Rural Land (1 du/10 ac)	Commercial (0 - 8 du/ac; FAR 1.0)	World Equestrian Center
Low Residential (0 - 1 du/ac)	Employment Center (0 - 16 du/ac; FAR 2.0)	Circle Square Woods VDRI
Medium Residential (1 - 4 du/ac)	Commerce District (N/A; FAR 2.0)	On Top of the World DRI
High Residential (4 - 8 du/ac)	Public (N/A; FAR 1.0)	Municipality
Urban Residential (8 - 16 du/ac)		

Date: 3/11/2026

STATE OF FLORIDA
DIVISION OF ADMINISTRATIVE HEARINGS

Charlotte C. Weber, Individually and
as Trustee of the Charlotte C. Weber
2001 Revocable Trust,

Petitioner,

DOAH Case No.

v.

Marion County, Florida,

Respondent.

_____ /

EXHIBIT "C"

TO

PETITION FOR FORMAL ADMINISTRATIVE HEARING

ORDINANCE NO. 26-11

AN ORDINANCE OF THE BOARD OF COUNTY COMMISSIONERS OF MARION COUNTY, FLORIDA, APPROVING A ZONING CHANGE APPLICATION FROM PLANNED UNIT DEVELOPMENT (PUD) TO PLANNED UNIT DEVELOPMENT (PUD), AND AUTHORIZING IDENTIFICATION ON THE OFFICIAL ZONING MAP; PROVIDING FOR AN EFFECTIVE DATE.

WHEREAS, the application for the Zoning Change was duly filed with the Growth Services Department and considered by the Marion County Planning and Zoning Commission at its meeting on June 30, 2025; and

WHEREAS, the aforementioned application was considered at a public hearing held by the Board of County Commissioners of Marion County, Florida, at its meeting on Wednesday, March 18, 2026; and

WHEREAS, the Board of County Commissioners of Marion County, Florida (Board), is responsible for and has established the zoning of parcels of property in the unincorporated area of Marion County as reflected on the official Zoning Map, and

WHEREAS, property owner(s) have submitted an application for rezoning, and such application identifies the property by metes and bounds description or by the Marion County Property Appraiser parcel number, and such identifications of property are hereby incorporated into this ordinance by reference, and

WHEREAS, the Board has considered the approval recommendation of the Marion County Planning and Zoning Commission, and has conducted the necessary public hearing, and has approved the application contained in this ordinance. The Board has determined that the application will not adversely affect the public interest, is consistent with the Marion County Comprehensive Plan, and is compatible with the surrounding land uses. Now therefore,

BE IT ORDAINED by the Board of County Commissioners of Marion County, Florida:

SECTION 1. REZONING APPROVAL. The Board hereby approves the below-listed application for Rezoning. NOTE: The terms and conditions of Board approvals of the Planned Unit Development are stated in the Board Resolution corresponding to each Planned Unit Development Application shown below.

1. **AGENDA ITEM 1.2.3. 250606ZP** – 250606ZP - Golden Ocala Equestrian Land, LLC, et. al., requests a Zoning Change, Articles 2 and 4, of the Marion County Land Development Code, to Modify Two Existing Planned Unit Development (PUD) Projects (20201201Z and 20210302Z) to Combine the PUDs into a Single United PUD and Amend a Portion of the United PUD to Allow for Indoor/Outdoor Sports Complex and Event Venue Facilities, along with establishing and modifying Development Standards for the new and existing Uses, on approximately 4,276.21 Acres Consisting of 391 Parcels, Including, but Not Limited to, Primary Parcel Identification Numbers of Interest 21069-007-01, 21081-000001, 21081-001-00, 21081-048-00, 21087-001-00, 21087-001-02, and 21623-000-00, and Other Numerous Parcels, Multiple Addresses and/or No Addresses

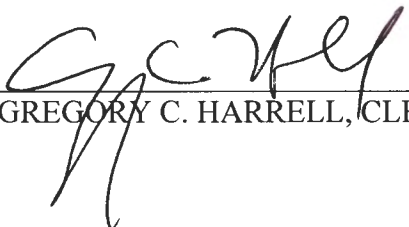
Subject to all terms and conditions of Resolution 26-R-79 attached hereto and incorporated herein by reference.

SECTION 3. EFFECTIVE DATE. A copy of this Ordinance as enacted shall be filed by the Clerk of the Board by email with the Office of the Secretary of State of Florida within ten (10) days after enactment, and this Ordinance shall take effect upon the later of the following:

1. Receipt of official acknowledgment from the Secretary of State that this Ordinance has been filed with such office; or
2. The effectiveness of the following: Comprehensive Plan Amendment No. 25-L01, approved by Ordinance No. 26-09; and Comprehensive Plan Amendment No. 25-L02, approved by Ordinance No. 26-10.

DULY ADOPTED in regular session this 18th day of MARCH 2026.

ATTEST:



GREGORY C. HARRELL, CLERK

BOARD OF COUNTY COMMISSIONERS
MARION COUNTY, FLORIDA



CARL ZALAK, III, CHAIRMAN

RECIEVED NOTICE FROM SECRETARY OF STATE ON
MARCH 27, 2026 ADVISING THAT ORDINANCE WAS
FILED ON MARCH 27, 2026.

RESOLUTION NO. 26-R-079

A RESOLUTION OF THE BOARD OF COUNTY COMMISSIONERS OF MARION COUNTY, FLORIDA, APPROVING THE MODIFICATION AND COMBINATION OF TWO EXISTING PLANNED UNIT DEVELOPMENTS (PUD 201201Z AND 210302Z) INTO ONE ON A ±4,276.21 ACRE TRACT FOR GOLDEN OCALA EQUESTRIAN LAND, LLC, ET AL ZONING CASE NUMBER 250606ZP; PROVIDING AN EFFECTIVE DATE.

WHEREAS, a zoning change application to modify and combine two (2) existing Planned Unit Developments (201201Z and 210302Z) into one (1) Planned Unit Development (PUD 250606ZP) was duly filed with the Growth Services Department and considered by the Marion County Planning and Zoning Commission at its meeting on June 30, 2025; and

WHEREAS, the aforementioned application was considered at a public hearing held by the Board of County Commissioners of Marion County, Florida, at its meeting on Wednesday, March 18, 2026. Now therefore,

BE IT RESOLVED by the Board of County Commissioners of Marion County, Florida:

SECTION 1. MODIFICATION AND COMBINATION OF THE PLANNED UNIT DEVELOPMENT (PUD 201201Z AND 210302Z) APPLICATION 250606ZP – Golden Ocala Equestrian Land, LLC, et al, the application as submitted by David Tillman, with Tillman & Associates Engineering, LLC, Ocala, FL 34471, to allow for a modification of Planned Unit Development (PUD 201201Z and 210302Z) to unite two (2) existing Planned Unit Development (PUD) projects (PUD 201201Z and 210302Z) into a single PUD project and amend a portion of the united PUD to allow for indoor/outdoor sports complex and venue facilities, along with establishing and modifying development standards for the new and existing uses, on an approximate 4,276.21 Acre Tract, Articles 2 and 4 of the Marion County Land Development Code, on Multiple Parcel Account Numbers encompassing Golden Ocala and World Equestrian Center, multiple addresses and/or no addresses assigned.

SECTION 2. FINDINGS AND DEVELOPMENT CONDITIONS. The Board has determined that this request will not adversely affect the public interest, is consistent with the Marion County Comprehensive Plan, and is compatible with the surrounding land uses. The Board of County Commissioners has considered the approval recommendation and findings of the Growth Services staff and the Planning and Zoning Commission regarding approval of the Planned Unit Development, and following public comment, the Board agrees with those affirmative findings and approves the Planned Unit Development subject to the following development conditions:

1. The PUD shall be developed consistent with the conditions outlined herein, the requirements of Marion County Comprehensive Plan Future Land Use Element Policy 10.5.1., and the PUD Concept Plan Amendment [Set Dated 1/9/2026, Received 2/5/2026, with revised pages 03.00 and 09.00 submitted 3/20/2026 in conformity with the Board's

approval, to reflect the removal of originally proposed outdoor concert venue locations 3, 4, and 5, leaving only outdoor concert venues #1 (Grand Outdoor Arena) and #2 (World Equestrian Center Stadium) remaining, and deleting the references to those eliminated outdoor concert venues from Tables #5 and #6 in following Condition #3], incorporated herein as Exhibit A.

- The project shall comply with the maximum development amounts as provided in FLUE Policy 10.5.1 of the Comprehensive Plan as listed below for reference, the project's PUD Concept Plan Amendment [12/30/25], and the conditions of this approval.

RESIDENTIAL HOUSING	
Low Residential	400
Medium Residential (including original Golden Ocala PUD)	1103
Equestrian Estate	300
High Residential	408
Condominium	170
Rural	16
<i>Total Housing Units</i>	<i>2,397</i>
NON-RESIDENTIAL	
Commercial	4,000,000 square feet
Equestrian Facilities	210 acres
Expo and Indoor Sports Facilities	30 acres
Outdoor Sports Facilities	90 acres
Hotel	1,650 rooms
Recreational Vehicle	280 units (does not include unoccupied parking spaces)

- Development types and standards shall be consistent with the types and minimum standards as provided in Tables #5 and #6, following, as listed on Sheet 3.01 and illustrated on Sheet 7.01 of the PUD Concept Plan Amendment [Set Dated 1/9/2026, Received 2/5/2026, with revised pages 03.00 and 09.00 submitted 3/20/2026 as described in Condition #1].

TABLE 5: GOLDEN OCALA PUD PROPOSED USES

USE	PERMITTED USES FOR DEVELOPMENT AREAS AND PROPOSED USE MAXIMUM DEVELOPMENT AMOUNTS (WITH EMPLOYMENT CENTER LAND USE ALLOCATION BASIS)
SINGLE-FAMILY	Single-family residence detached and Single-family-residence attached (aka duplex).
MULTIPLE-FAMILY	Single-family residence detached, Single-family-residence attached (aka duplex), and Multiple-family residence (apartment, condominium, or townhouse).
<i>Maximum Aggregate Residential Amount: Up to 2,397 dwelling units per FLUE Policy 10.5.1, but allowing for exchanges of land use per that same policy.</i>	
COMMERCIAL	Range of allowable uses shall conform to B-4 (REGIONAL BUSINESS) zoning uses as listed in the Marion County Land Development Code (LDC); more intense uses may be considered consistent with LDC Division 2.8. Special Use Permit.
EQUESTRIAN FACILITIES	Equestrian and special event facilities, primarily focused on equestrian-related use including, without limitation, polo fields, equestrian arenas, equestrian instruction facilities, concerts, veterinary clinics, farriers (non-mobile), stables and barns, feed stores, tack shops, chapels, storage areas, maintenance buildings; and in the Urban Area may also include and blend with Commercial uses as listed above and in the accompanying PUD conditions.
OUTDOOR SPORTS FACILITIES	Multi-purpose fields including, without limitation: soccer, hockey, football, baseball, polo, with ancillary uses including, without limitation: pickle ball, golf, graduations, shows (e.g., dog, RV, outdoor, garden, boat, automobile, etc.), festivals, parking facilities, storage areas, and maintenance buildings; and in the Urban Area may also include and blend with Commercial uses as listed above and in the accompanying PUD conditions.
EXPO AND INDOOR SPORTS FACILITIES	Facilities capable of use by a large number of people for a multiple of purposes including, without limitation: meetings, exhibition, exposition, trade shows, entertainment, concerts, graduations, shows (e.g., dog, RV, outdoor, garden, boat, automobile, etc.), festivals, sporting events, parking facilities, storage areas, and maintenance buildings; and in the Urban Area may also include and blend with Commercial uses as listed above and in the accompanying PUD conditions.
<i>Maximum development amounts are: Commercial development is 4,000,000 GSF, Equestrian Facilities is 210 acres, Expo and Indoor Sports Facilities is 30 acres, and Outdoor Sports Facilities is 90 acres, Hotel is 1,650 rooms, and RV Spaces/Lots is 280 units/spaces/lots, per FLUE Policy 10.5.1, but allowing for exchanges of land use per that same policy.</i>	

TABLE 6: GOLDEN OCALA PUD - PROPOSED DEVELOPMENT STANDARDS

STRUCTURE TYPE	Minimum Lot			Minimum Setbacks ^{1, 2, 7}			Max Height
	Width	Depth	Area	Front	Rear	Side/Corner ³	
Rural Equestrian Estates Single-Family Residential Detached 10-Acre*							
Principle	150'	150'	435,600 SF	20'	30'	5'/10'	60'
Accessory	N/A	N/A	N/A	20'	5'	5'/10'	50'
Mechanical	N/A	N/A	N/A	20'	5'	5'/10'	15'
Equestrian Estates Single-Family Residential Detached 3-ac*							
Principle	40'	60'	130,680 SF	20'	25'	5'/10'	60'
Accessory	N/A	N/A	N/A	20'	5'	5'/10'	50'
Mechanical	N/A	N/A	N/A	20'	5'	5'/10'	15'
Single-Family Residential Detached*							
Principle	40'	60'	2,400 SF	20'	10'	5'/10'	40'
Accessory	N/A	N/A	N/A	25'	5'	5'/10'	25'
Mechanical	N/A	N/A	N/A	25'	5'	5'/10'	10'
Single-Family Residential Attached (Duplex)*							
Principle	35'	60'	2,100 SF	20'	10'	5'/10'	35'
Accessory	N/A	N/A	N/A	25'	8'	Int. - 0'/Ext. - 5'/10'	20'
Mechanical	N/A	N/A	N/A	25'	8'	Int. - 0'/Ext. - 5'/10'	10'

TABLE 6: GOLDEN OCALA PUD - PROPOSED DEVELOPMENT STANDARDS							
STRUCTURE TYPE	Minimum Lot			Minimum Setbacks ^{1,2,7}			Max Height
	Width	Depth	Area	Front	Rear	Side/Corner ³	
Multiple-Family Residential (Quad+, Apartment, Condominium, Townhome)**							
Overall Principal Structure	40'	60'	2,400 SF	20'	10'	8/15'	65'
Principle Structure - Interior Unit	25'	N/A	1,200 SF	20'	10'	0'	65'
Principle Structure - Interior Lot	25'	N/A	1,200 SF	20'	10'	0'	65'
Principle Structure - End Unit	25'	N/A	1,200 SF	20'	10'	Int. - 0'/Ext. - 8'/10'	65'
Principle Structure - End Lot	35'	N/A	1,200 SF	20'	10'	Int. - 0'/Ext. - 8'/10'	65'
Accessory	N/A	N/A	N/A	25'	10'	Int. - 0'/Ext. - 10'	25'
Mechanical	N/A	N/A	N/A	25'	10'	Int. - 0'/Ext. - 10'	10'
Commercial & Expo							
Principle	None	None	None	20'	10'	0'/0'	75'/100' ⁴
Accessory	N/A	N/A	N/A	20'	5'	0'/0'	50'
Mechanical	N/A	N/A	N/A	25'	5'	0'/0'	40'
Equestrian / Event Facilities - World Equestrian Center (WEC)							
Principle	None	None	None	20'	10'	0'/0'	75'/100' ¹
Accessory	N/A	N/A	N/A	20'	5'	0'/0'	50'
Mechanical	N/A	N/A	N/A	25'	5'	0'/0'	40'
Sports Facility - World Equestrian Center (WEC)							
Principle	None	None	None	20'	10'	0'/0'	75'/100' ¹
Accessory	N/A	N/A	N/A	20'	5'	0'/0'	50'
Mechanical	N/A	N/A	N/A	25'	5'	0'/0'	40'
*RESIDENTIAL STRUCTURE TERM DESCRIPTIONS							
Principal = Primary habitable occupied structure (e.g., residential unit/building, common recreation amenities (e.g. clubhouse, pools, playgrounds) etc.).							
Accessory = Customary individual unit residential accessory uses such as but not limited to: storage buildings, individual swimming pools and/or screen enclosures, guest cottages, detached garages, pool house, cabana. Buildings housing animals are permitted in Rural Equestrian Estates SFR and Equestrian Estates SFR.							
Mechanical = Individual residential unit air-conditioner units and pool pumps, etc.							
Commercial							
Comply with B-4 (Regional Business) zoning uses.							
Equestrian / Event Facilities - World Equestrian Center (WEC)							
Comply with defined uses within PUD Conditions.							
Expo - World Equestrian Center (WEC)							
Comply with defined uses within PUD Conditions.							
Sports Facility - World Equestrian Center (WEC)							
Comply with defined uses within PUD Conditions.							
¹ In the event an easement or buffer is in place and/or required, the setback shall be subject to the more restrictive placement limitation and shall not encroach into an easement or buffer.							
² LDC Commercial encroachment allowances for gasoline canopies, islands, and pumps shall also apply, subject to the compliance with the easement/buffer limitation listed in Footnote 1 above.							
³ Further increased side/corner setbacks may be required to ensure minimum LDC intersection & driveway safe sight-distance standards are satisfied.							
⁴ Multiple-family residential development areas abutting the exterior boundary of the PUD shall observe an increased setback, regardless of yard type, observing the equivalent of 10-feet (10') of setback plus an additional one-foot (1') of setback for each 1-foot (1') in structure height above thirty-feet.							
⁵ Maximum principle structure building height is 100-ft unless the proposed principle structure is located within the height limitation zone, which has a maximum height limit of 75-ft. Structures above these height limitations may be permitted by special use permit.							
⁶ Concerts shall be allowed at the following locations: indoors at all enclosed non-residential buildings, outdoors at the Grand Outdoor Arena and Plaza, and outdoors at the World Equestrian Center Stadium.							
⁷ Setbacks for non-residential areas shall be measured from nearest line of a parcel not owned by owner or entities under common ownership or control with such owner.							

- No Equestrian Estate lot created shall be less than three (3) acres in size, measured exclusive of any right-of-way or access easements (except to the extent such access easements provide access between lots and platted streets, are designed to permit the use of shared driveways to provide such access, or are designated easements for utilities or equestrian trails).

7.2 The LUTE Matrix tradeoff mechanism shown above applies to the entire Project boundary except that:

- a) Within the Phase 1 and Phase 3 areas of the Equestrian Estates as shown on PUD Concept Plan Amendment [Set Dated 1/9/2026, Received 2/5/2026, as revised in Condition #1] sheet 4.01, Equestrian Estates is the only allowed use.
 - b) Within the portion of the project where Equestrian Estates are eligible for conversion, only single-family residential is permitted. Density will not exceed one unit per acre, as described by the Low Residential Future Land Use, and connection to central water and sewer service provided by Marion County Utilities is required upon conversion.
 - c) Land use conversion is not permitted within the area designated as Equestrian Truck/Trailer Parking as shown on the approved PUD Master Plan.
8. Direct vehicular access to NW 100th Avenue south of the northwest quarter of the southwest quarter of Section 11, Township 15, Range 20 is prohibited.
 9. Traffic management, construction of off-site improvements and proportionate share contributions shall be governed by the Second Amendment to Development Agreement Concurrency, Impact Fee Credits, and other Matters, for Golden Ocala approved simultaneous with the PUD, and any amendment thereto including the "Third Amendment" as defined in such Second Amendment.
 10. The developer has not obtained full Concurrency Certification for the PUD and shall address and comply with Marion County's Concurrency Management System, including providing for proportionate share for transportation improvements consistent with Sections 163.3180 and 380.06, Florida Statutes, upon proceeding through Marion County's subsequent development review process as contained within the Marion County Land Development Code (LDC Article 1, etc.).
 11. The commercial, common, and non-residential areas, World Equestrian Center, and individual lots and homes (entire project) shall utilize water conservation techniques. Such techniques may include indoor, irrigation, and landscaping practices as selected by the Developer, required certifications for irrigation contractors working within the development, wastewater contribution for municipal reuse, reuse water for irrigation of common areas, maximum irrigable areas, or other landscape and vegetative requirements. To the extent possible, these techniques will be identified in the development documents related to covenants and restrictions and may be included in subsequent developer agreements with Marion County Utilities.
 12. No structures are permitted in locations where FEMA-designated special flood hazard areas or modified floodplains are privately owned and utilized as stormwater retention areas to meet Marion County Land Development Code Stormwater Standards. These areas must be identified on all final plats and reflected in the owner's deeds. This condition may be waived on a case-by-case basis when calculations are provided by a licensed professional demonstrating that compensating storage is accomplished and approved by the County Engineer. Further, the applicant will be required to file a map amendment with FEMA.

13. All project development shall be served by central potable water and central sanitary sewer services consistent with Condition No. 14.3. However, development of the lands designated World Equestrian Center in the Rural Area and lying between NW 100th Avenue and NW 110th Avenue shall comply with LDC water and sewer connection requirements based on the final plan of development. Further, the Low Residential (Area 1) lying north/northeast of the Golden Hills development shall conform to the final provisions of FLUE Policy 10.5.1 as noted previously.
14. For the World Equestrian Center, the following conditions apply:
 - 14.1. Parking in County or FDOT right-of-way is prohibited. The applicant is responsible for ensuring adequate signage and directions to the Center's parking areas are visible to patrons, along with providing supplemental signs to indicate parking in such public right-of-way is not permitted in order to prevent such parking.
 - 14.2. Ingress/egress at NW 100th Avenue is prohibited for event traffic except through the northernmost entrance, specifically used for access to the Equestrian Truck/Trailer Parking Area.
 - 14.3. The equestrian and sports facilities will utilize centralized water for potable use and central sewer provided by Marion County Utilities. A non-potable water source may be implemented for ancillary uses such as fire flow and equestrian facility maintenance (e.g., animal wash stations, dust control, etc.) and irrigation.
 - 14.4. All equestrian and sports facilities' lights shall be aimed toward the subject property and shielded to minimize glare and light trespass onto adjacent agricultural/residential properties as required by the LDC, and no LDC waivers for such requirements may be authorized.
 - 14.5. The project shall comply with applicable provisions of Chapter 13 of the Marion County Code (the Noise and Vibration Control Ordinance of Marion County, Florida), unless enabled by obtaining a Special Event Permit pursuant to the Marion County Code of Ordinances.
 - 14.6. The site shall be designed and maintained to minimize erosion, wetland degradation, and wasteful water use. This will be ensured through enrollment in Best Management Practices identified by a Notice of Intent, filed with the Department of Agricultural and Consumer Services, as periodically revised, or compliance with a Nutrient Management Plan prepared by a professional engineer that is a NRCS approved Technical Service Provider (if BMP enrollment is not required by FDACS).
 - 14.7. Livestock waste (manure and bedding) shall be stored in a water-tight structure that will not allow stormwater discharge. At no time shall livestock waste be allowed to accumulate beyond the threshold of the livestock waste storage area. Waste storage may include roll-off containers, provided that they are watertight.
 - 14.8. Jurisdictional wetlands and special flood hazard areas are to be delineated, agency-verified, and included in the details of the Major Site Plan.

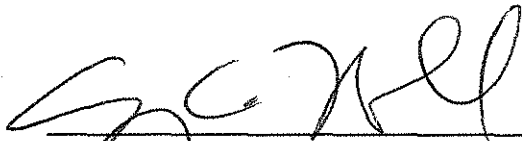
15. Project buffers shall be provided consistent with those provided on Sheet 6.01 of the PUD Concept Plan Amendment [Set Dated 1/9/2026, Received 2/5/2026].
16. The overall project may be developed in sections or phases, subject to providing an overall coordinated section or phase-related plan to ensure each section or phase stands alone. Upon completion of the Development Review Committee's PUD Master Plan review, each PUD Master Plan, including the final architectural details, development phasing, and amenity details, shall be brought forward to the Marion County Board of County Commissioners for final review and approval consideration by the Board.
17. The PUD/WEC Master Sign Plan shall consist of two component parts:
 - a) PUD Concept Plan Amendment [Set Dated 1/9/2026, Received 2/5/2026, with revised pages 03.00 and 09.00 submitted 3/20/2026] sheet 4.01, which identifies the conceptual sign locations, with Exhibit "B" consisting of the PUD Sign Type Elevation View Exhibit attached hereto, and
 - b) The original WEC complex Master Sign Plan applicable to the WEC arenas and barns (logo and title, lighted and unlighted) per Zoning Cases No. 20170506Z/200201Z attached as Exhibit "C".

SECTION 4. EFFECTIVE DATE. This Resolution shall take effect immediately upon the effective date of this Zoning Change's corresponding Rezoning Ordinance, No. 26-11.

DULY ADOPTED in regular session this 18th day of March, 2026.

ATTEST:

**BOARD OF COUNTY COMMISSIONERS
MARION COUNTY, FLORIDA**



GREGORY C. HARRELL, CLERK



CARL ZALAK, III, CHAIRMAN

EXHIBIT "A"

PUD MODIFICATION AMENDMENT CONCEPTUAL PLAN

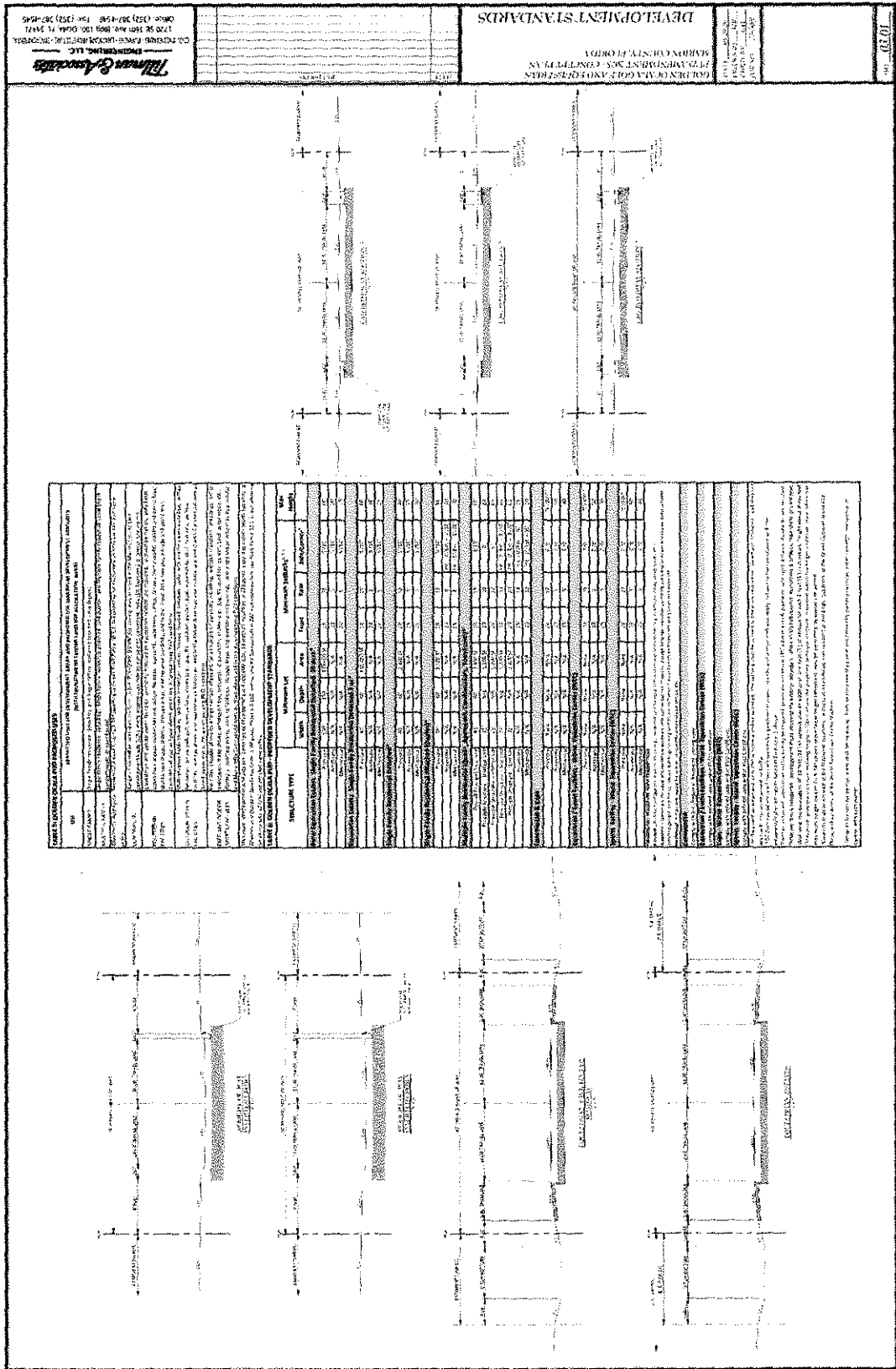


EXHIBIT "A"

PUD MODIFICATION AMENDMENT CONCEPTUAL PLAN

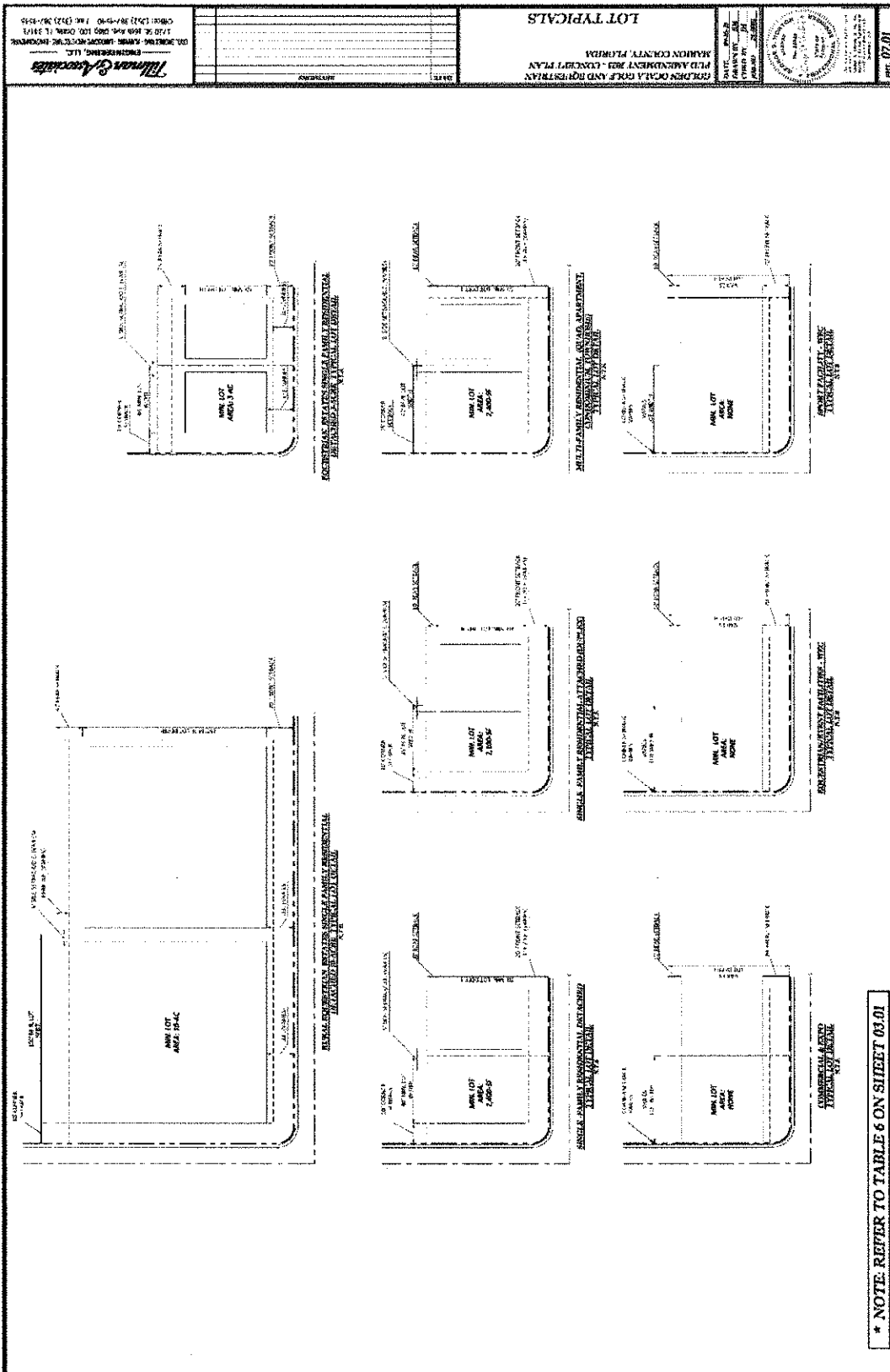
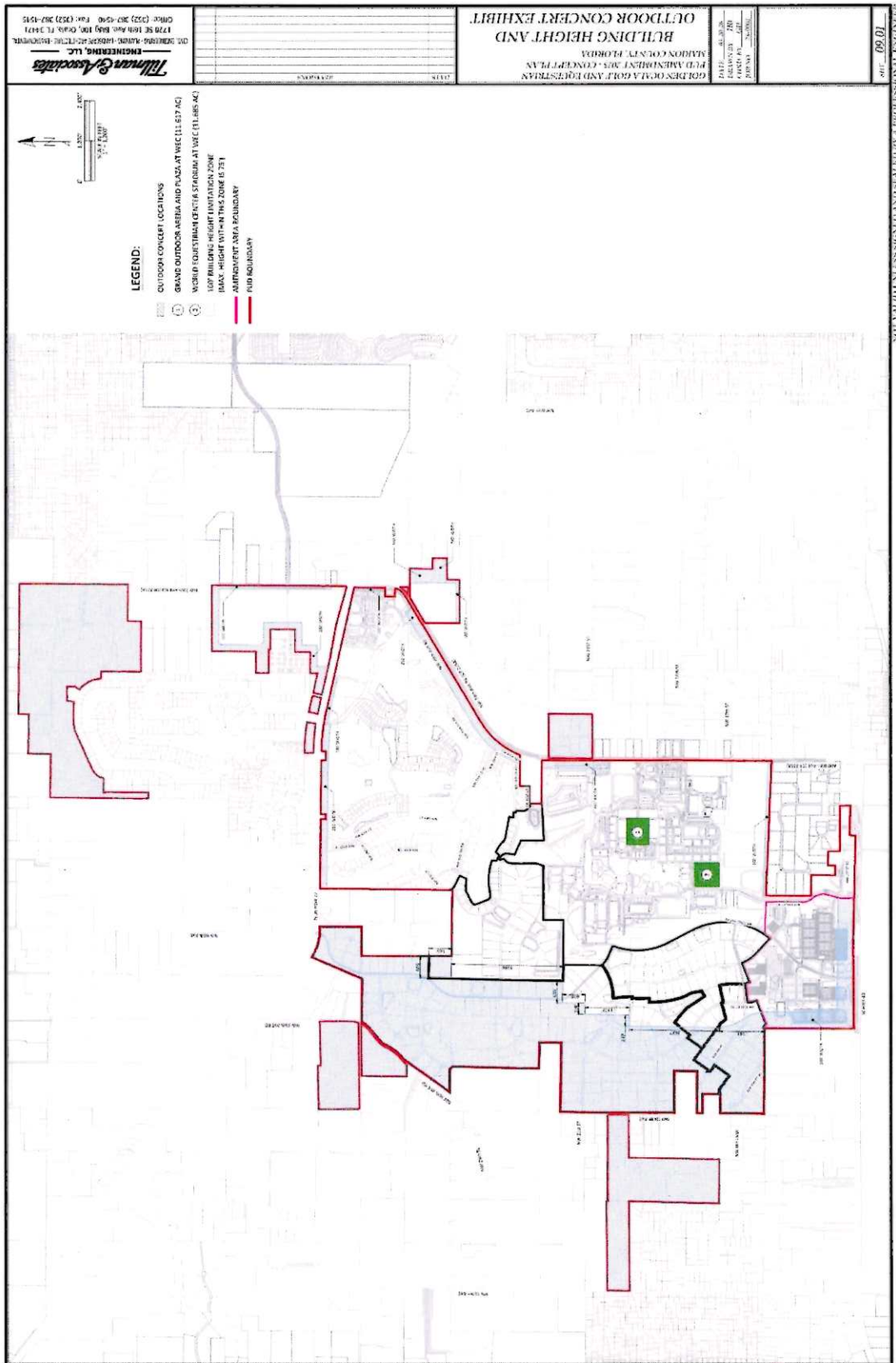


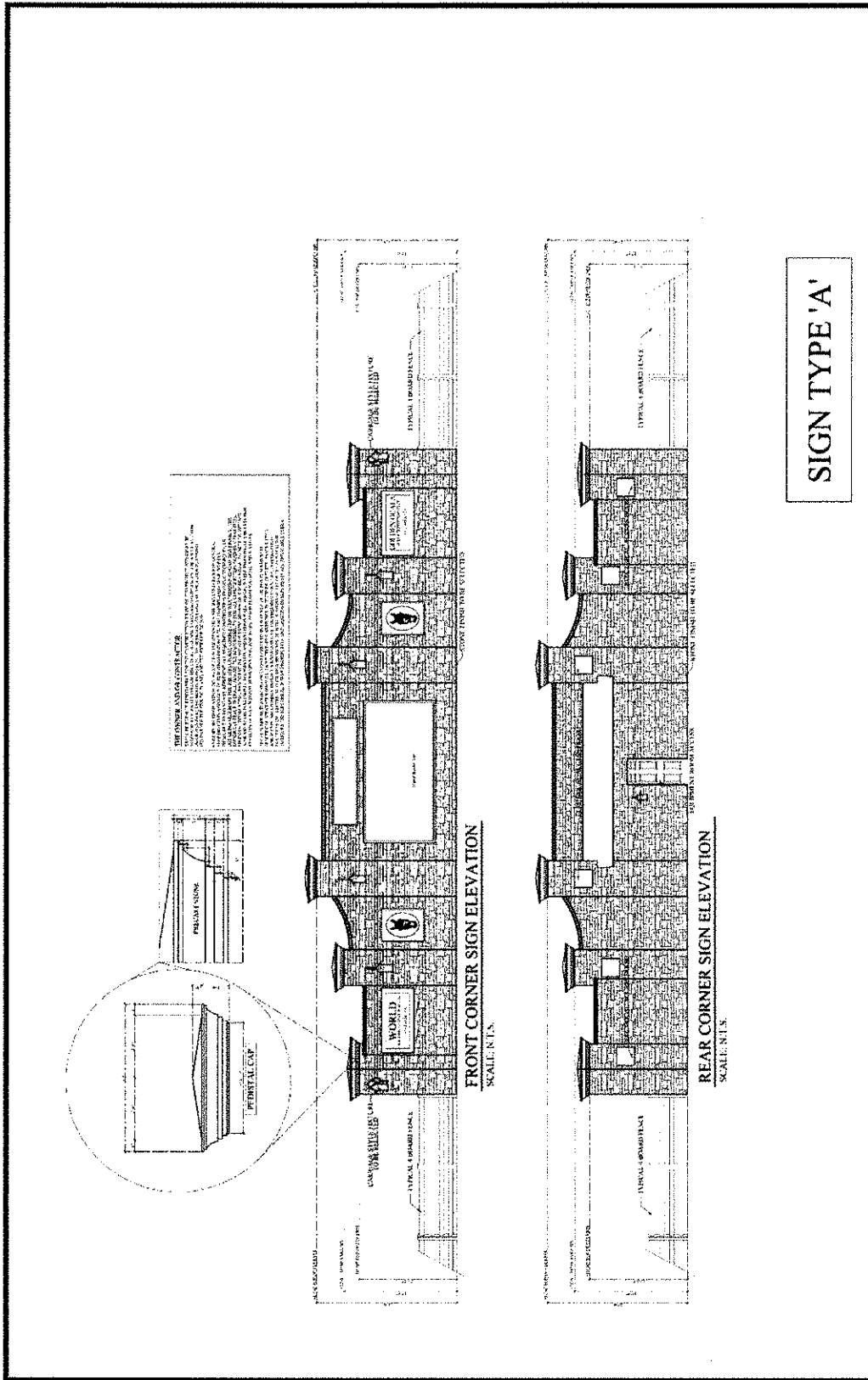
EXHIBIT "A"

PUD MODIFICATION AMENDMENT CONCEPTUAL PLAN



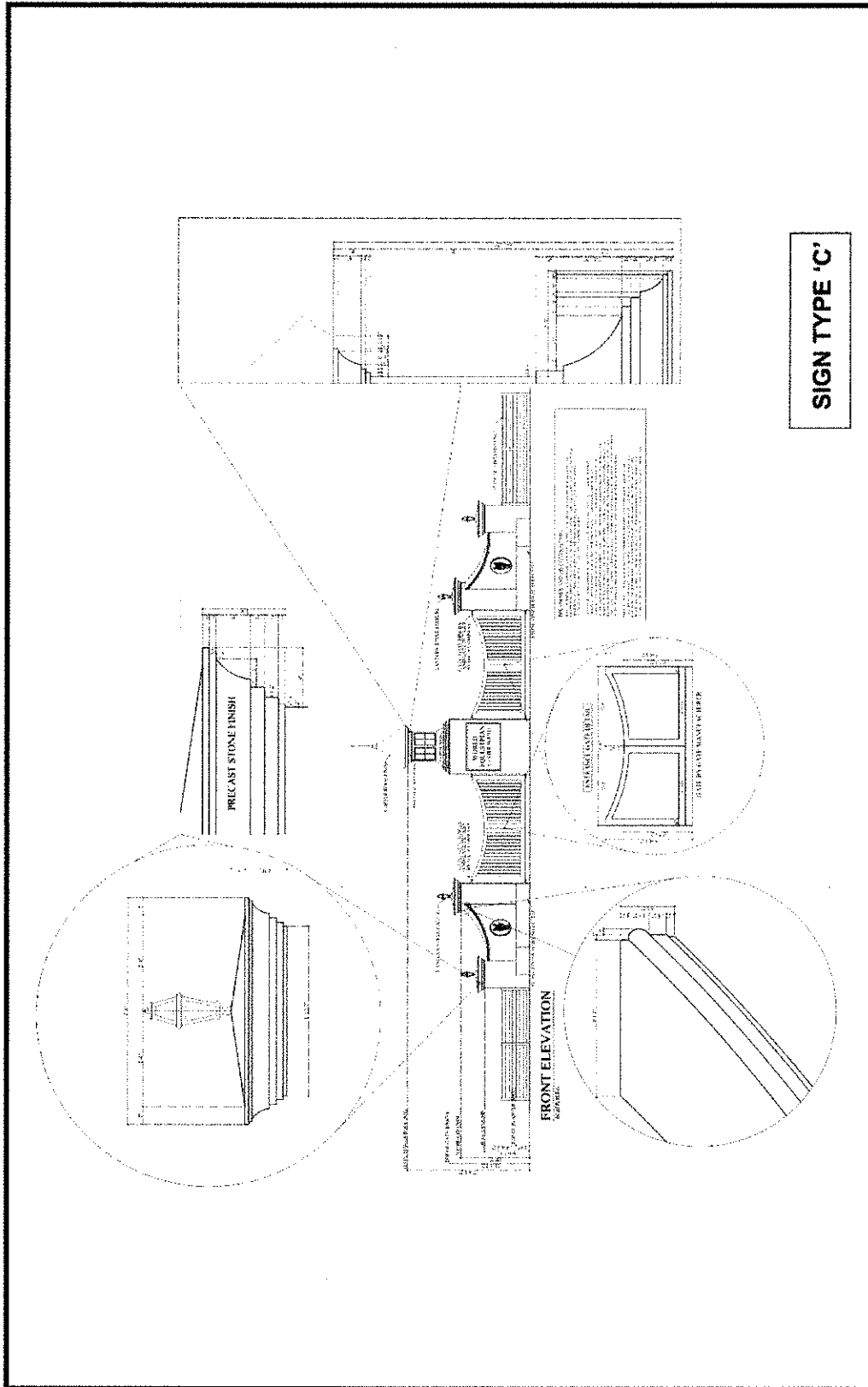
NOT VALID UNLESS SIGNED AND SEALED BY A PROFESSIONAL ENGINEER

EXHIBIT "B"
PUD SIGN TYPE ELEVATION VIEW SET



SIGN TYPE 'A'

EXHIBIT "B"
PUD SIGN TYPE ELEVATION VIEW SET

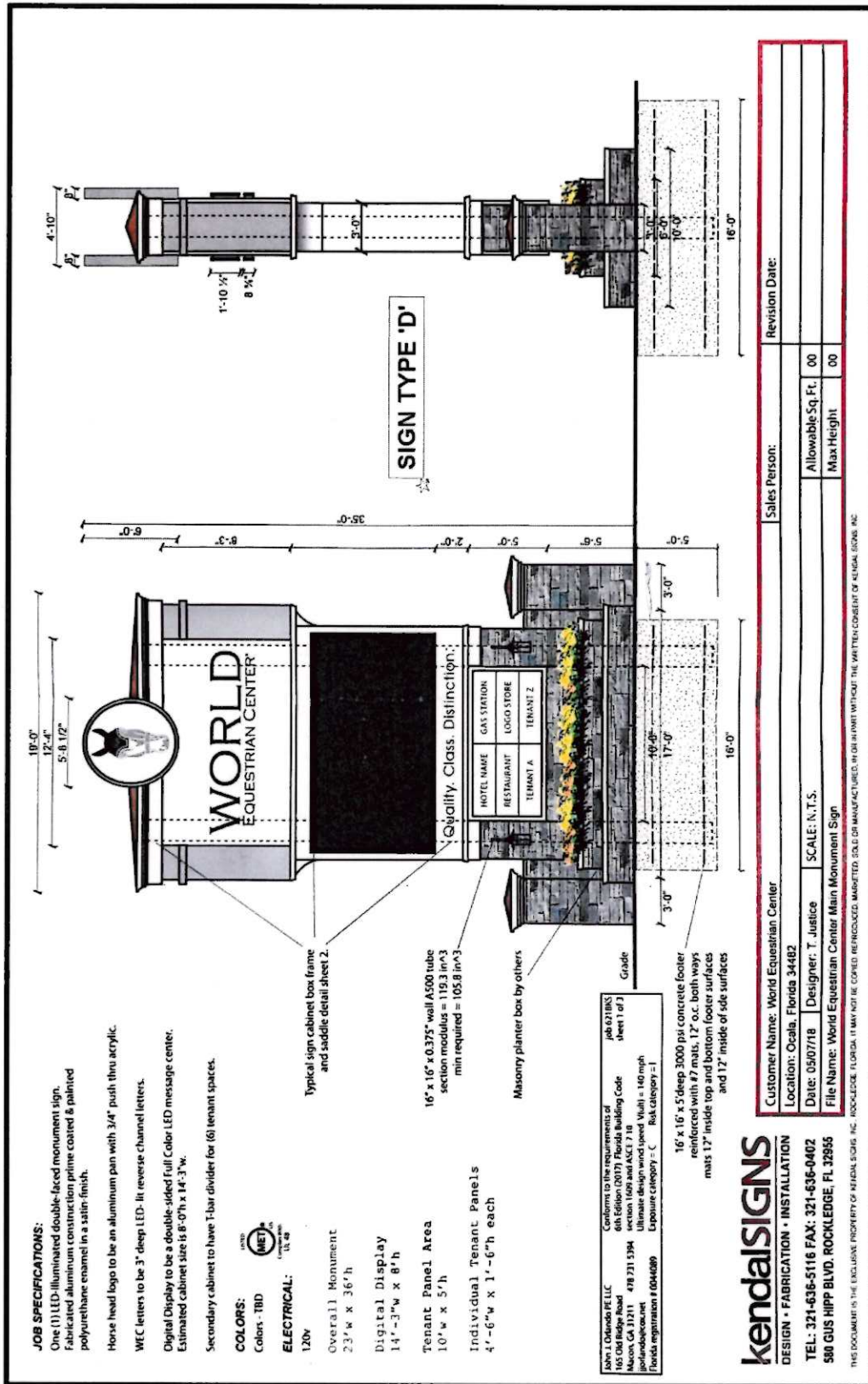


SIGN TYPE 'C'

NOT FOR CONSTRUCTION

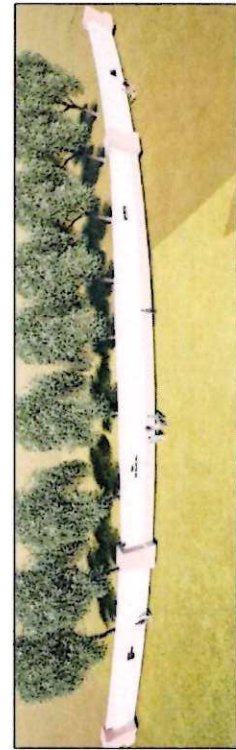
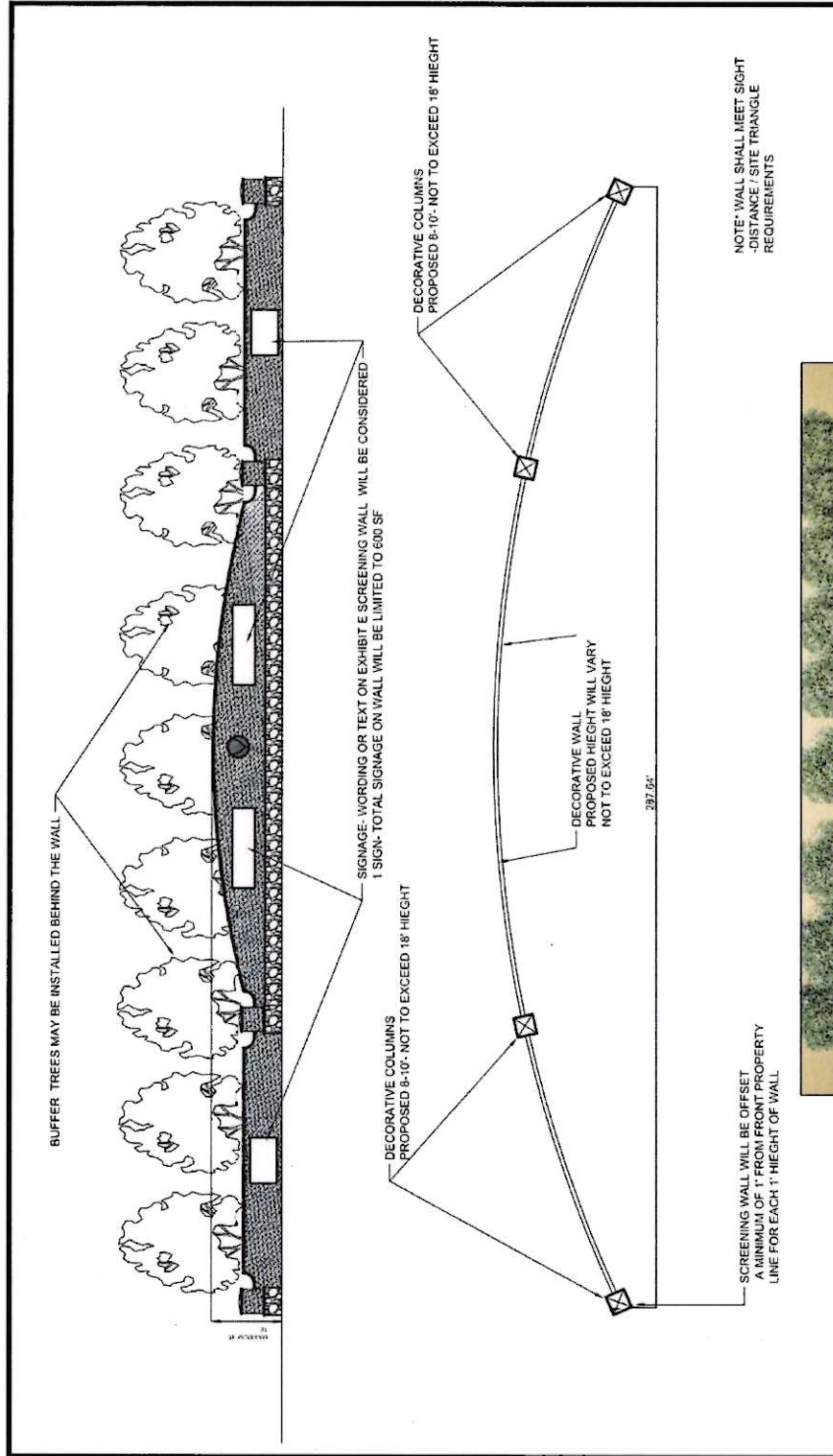
Wilson County Board of Commissioners - Planning and Zoning Department - 1000 North Main Street, Wilson, TN 37154 - 615-933-1234

EXHIBIT "B"
PUD SIGN TYPE ELEVATION VIEW SET



NOT FOR CONSTRUCTION

EXHIBIT "B"
PUD SIGN TYPE ELEVATION VIEW SET



☆ EXHIBIT E -
 SCREENING WALL

CYPRESS MANAGEMENT
 AND DESIGN
 10000 W. 10TH AVE., SUITE 100
 DENVER, CO 80231

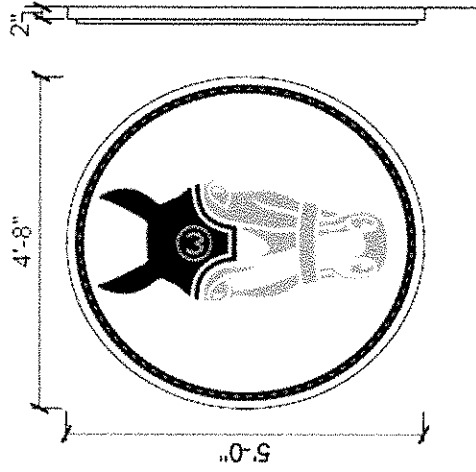
EXHIBIT "C"
PUD WEC COMPLEX MASTER SIGNAGE

Non-Illuminated Reverse Channel Letters A-Q
 2" deep fabricated aluminum, prime coated & painted
 polyurethane enamel in a semi-gloss finish



B C D E F
G H I J K L
M N O P Q

Non-Illuminated Horse Ring Logos
 2" deep fabricated aluminum pan prime coated & painted
 polyurethane enamel in a semi-gloss finish.
 Horse & Ring to be 3/4" painted acrylic applied to
 face of pan.



QTY: 2 (per elevation)

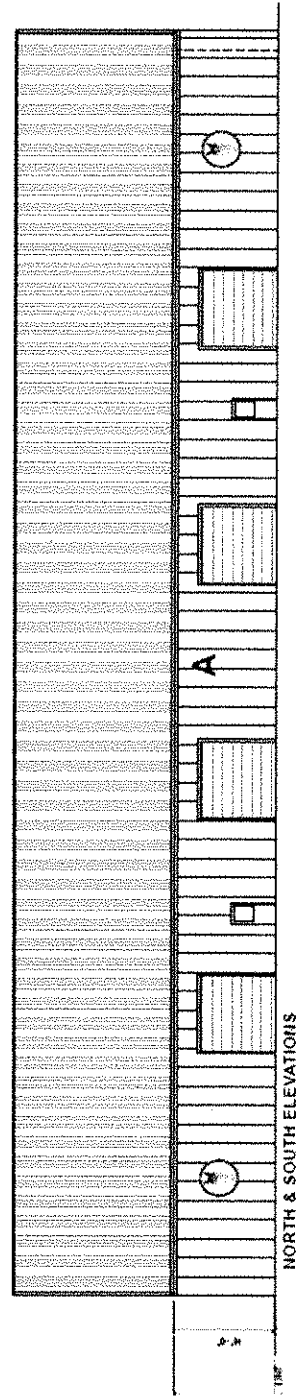


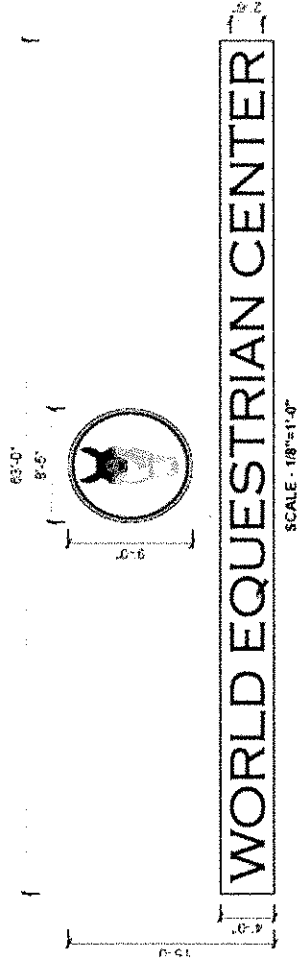
EXHIBIT "C"
PUD WEC COMPLEX MASTER SIGNAGE

RGB LED-Illuminated Horse Ring Logo & Reverse Channel Letters on Backer Panel

2" deep fabricated aluminum pan prime coated & painted polyurethane enamel in a semi-gloss finish.

Horse & Ring to be 2" fabricated aluminum primed & painted, mounted raised on top of pan to create halo effect.

Reverse channel letters also to be halo lit.



RGB LED-Illuminated Horse Head Logos (No Ring)

2" deep fabricated aluminum pan prime coated & painted polyurethane enamel in a semi-gloss finish.

Horse to be routed out with 3/4" thick push-through acrylic with 1/4" acrylic painted faces to create halo effect.

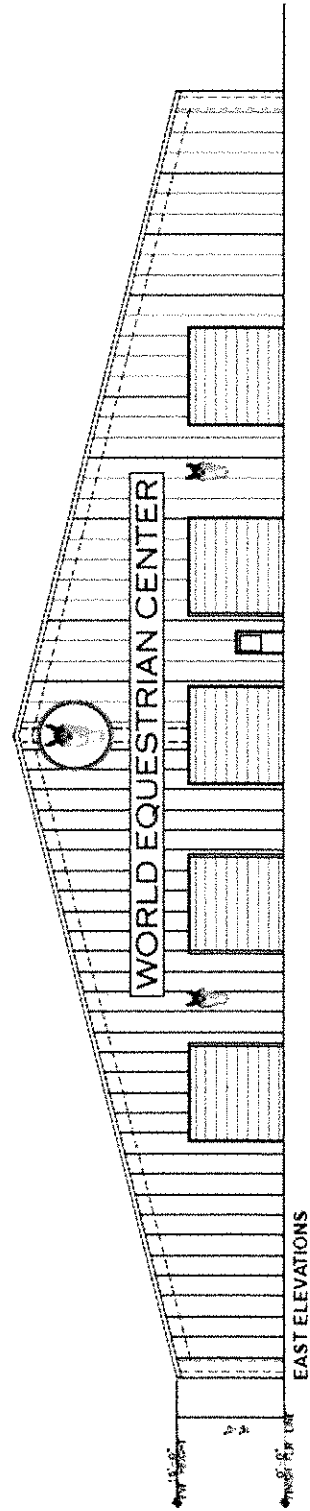
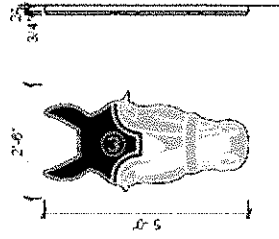


EXHIBIT "C"
PUD WEC COMPLEX MASTER SIGNAGE

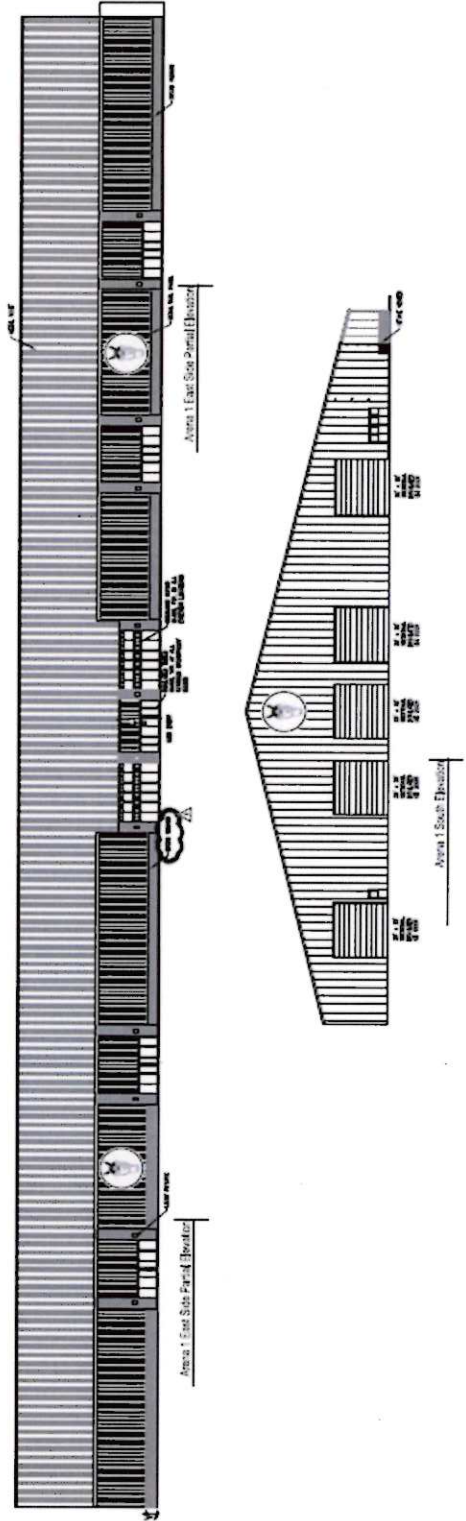
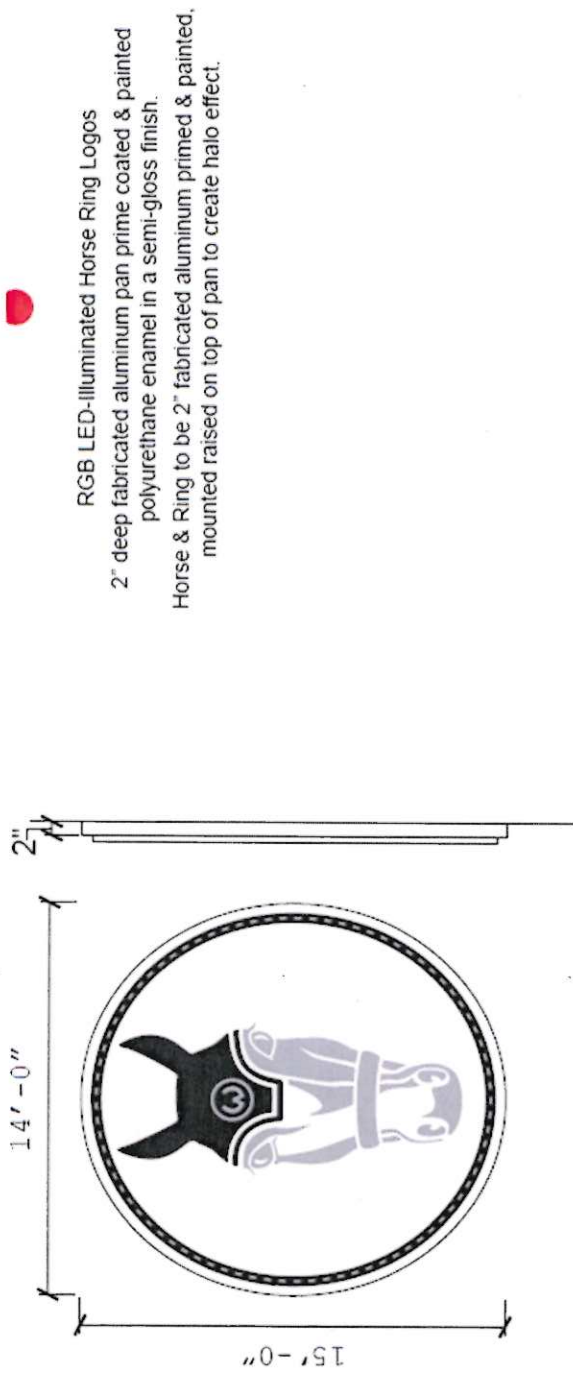
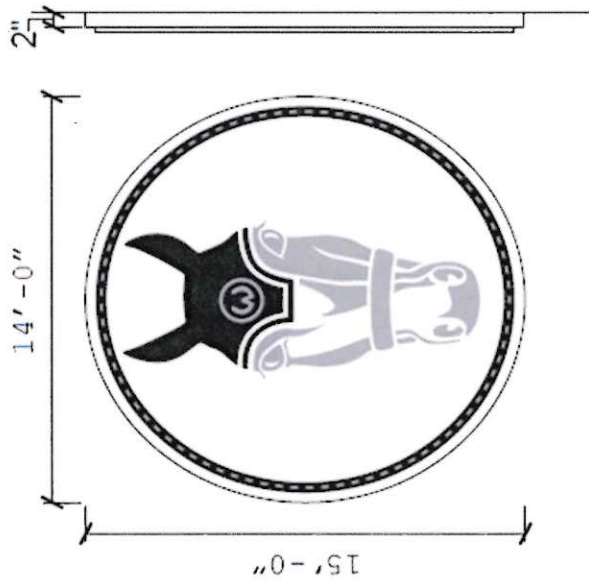
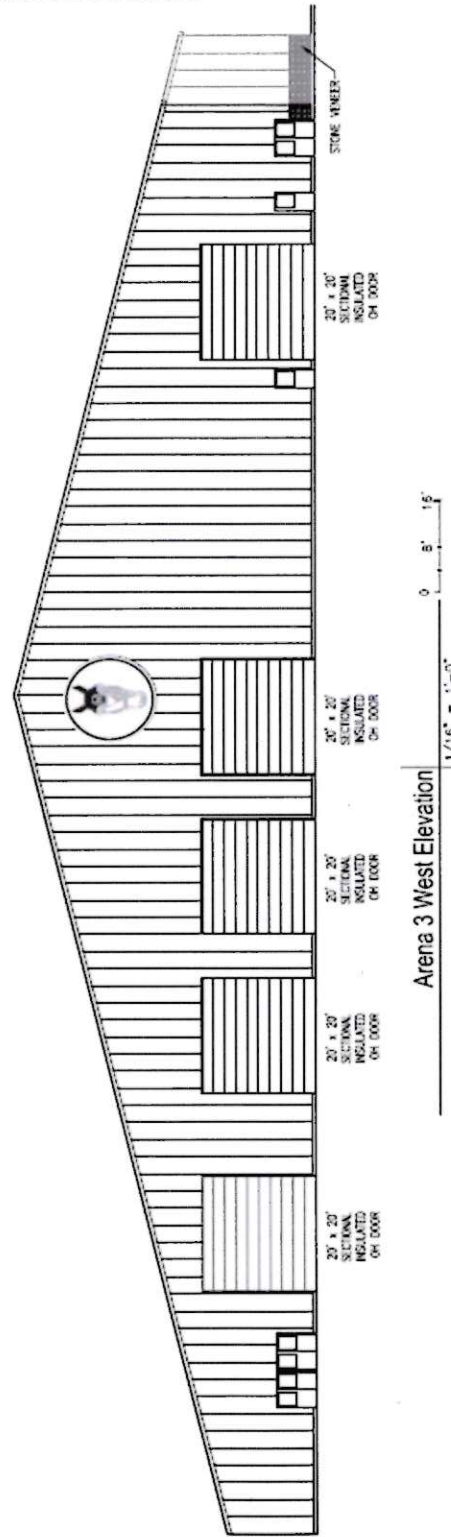


EXHIBIT "C"
PUD WEC COMPLEX MASTER SIGNAGE



Non-Illuminated Horse Ring Logos
 2" deep fabricated aluminum pan prime coated & painted
 polyurethane enamel in a semi-gloss finish.
 Horse & Ring to be 2" fabricated aluminum primed &
 painted, mounted raised on top of pan.



STATE OF FLORIDA
DIVISION OF ADMINISTRATIVE HEARINGS

Charlotte C. Weber, Individually and
as Trustee of the Charlotte C. Weber
2001 Revocable Trust,

Petitioner,

DOAH Case No.

v.

Marion County, Florida,

Respondent.

EXHIBIT "D"

TO

PETITION FOR FORMAL ADMINISTRATIVE HEARING

This Instrument Prepared by and Return To:
W. James Gooding III
Gooding, Batsel, Hartley & MacKay
1531 SE 36th Avenue
Ocala, FL 34471

Rec. \$ _____

**SECOND AMENDMENT TO DEVELOPMENT AGREEMENT CONCERNING
CONCURRENCY, IMPACT FEE CREDITS, AND OTHER MATTERS, FOR GOLDEN OCALA**

THIS SECOND AMENDMENT TO DEVELOPMENT AGREEMENT CONCERNING CONCURRENCY, IMPACT FEE CREDITS, AND OTHER MATTERS, FOR GOLDEN OCALA (the "Second Amendment"), is executed as of March 18, 2026, (the "Second Amendment Effective Date") by and between (each a "Party" and collectively, the "Parties"):

- Marion County, Florida, a political subdivision of the State of Florida ("County"); and
- The following (individually and collectively, "Owner"): Golden Ocala Equestrian Land, L.L.C., an Ohio limited liability company, Equestrian Operations, L.L.C., an Ohio limited liability company, Roberts Development Corporation, an Ohio corporation, and R.L.R. Investments, LLC, an Ohio limited liability company.

WHEREAS:

- A. On or about June 6, 2018, Owner and its predecessors in title, and County entered into the *Development Agreement Concerning Concurrence, Impact Fee Credits, and Other Matters for Golden Ocala (the "Original Agreement")* as recorded in OR Book 6791, page 105.¹
- B. Effective as of January 19, 2021, Owner and County entered into the *First Amendment to Development Agreement Concerning Concurrence, Impact Fee Credits, and Other Matters, for Golden Ocala* as recorded in OR Book 7388, page 861. The Original Agreement, as amended by the First Amendment, is hereinafter referred to as the "Current Agreement."
- C. On or about March 18, 2026, the Marion County Board of County Commissioners approved the following (the "2026 WEC Approvals") for the Property² some of which dealt with the subject matter of the Current Agreement: Ordinance Numbers 26-09, 26-10, and 26-11.
- D. Owner and County now desire to further amend the Current Agreement pursuant to this Second Amendment.
- E. County has provided its Notice of Intent to consider entering in this Second Amendment by notices published on the County's publicly accessible website pursuant to Section 20-3 of the County Code, on February 9, 2026, and March 9, 2026, and by mailing a copy of the Notice of Intent to Owners, and to the persons and entities shown on the most recent Marion County Tax Roll to be the owners of property lying within three hundred feet (300') of the boundaries of the Property which is the

¹ All recording references refer to the public records, Marion County, Florida.

² Terms capitalized in this Second Amendment and not otherwise defined herein, have the same meaning herein as in the Current Agreement.

subject-matter of this Agreement, and by announcing the date, time, and place of the second hearing during the first hearing.

- F. The County Commission held public hearings on February 18, 2026, and on March 18, 2026, to consider this Second Amendment, and found that this Second Amendment will further the objectives of the Community Planning Act, and that the development contemplated and permitted by this Second Amendment is consistent with the Marion County Comprehensive Plan and County LDR.

NOW, THEREFORE, in consideration of the mutual covenants contained herein (which are incorporated herein by reference), and other good and valuable consideration, the sufficiency of which is hereby acknowledged, the parties do hereby agree as follows, which terms shall be binding upon the parties and their respective successors and assigns, as may be applicable:

- 1. **Development Uses Permitted.** Paragraph 3.1 of the Original Agreement, as amended by paragraph 2 of the First Amendment, is further amended to read as follows:

3. Development Uses Permitted.	
3.1. The development uses permitted on the Property pursuant to the Golden Ocala Approvals are as follows:	
RESIDENTIAL HOUSING	
Low Residential	400
Medium Residential (including original Golden Ocala PUD)	1103
Equestrian Estate	300
High Residential	408
Condominium	170
Rural	16
Total Housing Units	2,397
NON-RESIDENTIAL	
Commercial	4,000,000 square feet
Equestrian Facilities	210 acres
Expo and Indoor Sports Facilities	30 acres
Outdoor Sports Facilities	90 acres
Hotel	1,650 rooms
Recreational Vehicle	280 units (does not include unoccupied parking spaces)

- 2. **Traffic Management.**
 - 2.1. Owner shall comply with the provisions of this paragraph 2 concerning traffic management for all events at the WEC that are likely to necessitate traffic management methods that involve private use of public right-of-way.
 - 2.2. Definitions:
 - 2.2.1. Traffic Management Plan - "Traffic Management Plan" means a written operational plan describing how traffic associated with events at the WEC will be managed before, during, and after such events. The events may be grouped into

one or more groups (each a “Group”) and different provisions may be established for each Group. The Traffic Management Plan shall identify as to each Group, and to the extent the information is available, anticipated event attendance levels, expected traffic volumes, ingress and egress routing, parking operations, coordination with law enforcement and emergency services, staffing assignments for traffic control personnel, use of dynamic message boards or other traveler information systems, and contingency procedures for incidents, congestion, or roadway blockages. The Traffic Management Plan may incorporate one or more Traffic Control Plans necessary to implement specific traffic control operations on public roadways. The Traffic Management Plan shall be prepared in general accordance with a Traffic Demand Management study accepted by the County such as the one referred to in paragraph 2.5.1.

- 2.2.2. Traffic Control Plan – “Traffic Control Plan” means a plan or set of drawings depicting the temporary traffic control devices, roadway lane configurations, signage, barricades, cones, variable message boards, law enforcement traffic posts, and other traffic control measures required to safely manage traffic on public roadways during events. The Traffic Control Plan shall conform to the applicable provisions of the Manual on Uniform Traffic Control Devices (MUTCD) and applicable County standards.
- 2.3. No later than three months after the date this Amendment becomes effective under paragraph 6.2, Owner shall apply, to the County Engineer, for a Right-of-Way Utilization Permit (“RUP”) pursuant to Section 2.22.1. of the County Land Development Code. The application shall include a Traffic Management Plan and Traffic Control Plan, complying with the provisions of this paragraph 2.
- 2.4. The Traffic Management Plan and Traffic Control Plan shall be signed and sealed by a Florida engineer licensed in the State of Florida certifying that the measures set forth in the Traffic Management Plan and Traffic Control Plan are: (a) consistent with those set forth in the *FDOT Standard Index Traffic Control* (the “FDOT Index”), contained in applicable provisions of Standard Plan Index 102-600 through 102-680 of the *FDOT Standard Plans*; or (2) where they are not consistent, they are sufficient to accomplish the goals of the applicable provisions of the FDOT Index through the alternative measures proposed.
- 2.5. The County Engineer shall review the application and, upon acceptance of it, the County Engineer shall issue a RUP with conditions that may include the following, as determined by County Engineer:
 - 2.5.1. The incorporation of one or more of the traffic management measures recommended in the *World Equestrian Center Traffic Demand Management Study* (“Traffic Management Study”) dated October 18, 2025, as accepted by County Engineer.
 - 2.5.2. The establishment of different Groups of events based on the number and size of such events, and particularly the number of people or trips expected during a particular time period. The conditions shall establish the traffic management measures required by Owner for each Group.
 - 2.5.3. Contact information for an individual at the WEC with whom County Engineer or designee can communicate in the event of traffic problems during events.

- 2.6. The RUP shall address traffic management measures and not additional traffic improvements.
- 2.7. The RUP shall contain provisions for Concert Uses as set forth in paragraphs 3.3 and 3.4
- 2.8. Each RUP shall be for a duration of one (1) year, and may be renewed, or a new RUP obtained, for subsequent years. Alternatively, for subsequent years, the County Engineer may issue RUPs with longer durations. As part of each renewal, Owner shall submit an updated Traffic Management Plan and Traffic Control Plan consistent with this paragraph 2. The County Engineer may require interim updates to the accepted Traffic Management Plan or Traffic Control Plan if changes in event size, event frequency, or observed traffic operations warrant revisions.
- 2.9. If Owner and County Engineer are not able to agree upon the RUPs or the conditions thereof, Owner may request the County Commission to resolve the dispute.
- 2.10. It is not necessary to amend this Agreement, including paragraph 3, to issue or renew RUPs.

3. Concert Uses.

- 3.1. Paragraph 10 of the Original Agreement, and paragraph 6.2.2.b.1). of paragraph 6.2 of the Original Agreement, as amended by paragraph 5 of the First Amendment, are hereby deleted.
- 3.2. The WEC may be utilized for Concert Uses pursuant to the provisions of this paragraph 3.
- 3.3. Concert Uses may be held pursuant to a RUP and subject to the conditions of the RUP.
- 3.4. The RUP for the initial year shall:
 - 3.4.1. Limit the number of Concert Uses for all facilities on the WEC that they are permitted for Concert Use by the PUD approved for the WEC to eight (8) per year which limit may be increased based on operational experience and traffic conditions by the County Engineer and County Administrator. Such numbers may be decreased pursuant to the last sentence of paragraph 2.8.
 - 3.4.2. Preclude more than two (2) Concert Uses taking place simultaneously. RUPs for subsequent years may modify this provision based on operational experience and traffic conditions if accepted by the County Engineer and approved by the County Administrator.
 - 3.4.3. Concert Uses shall not be scheduled on more than two (2) consecutive days. Concert Uses scheduled for more than two (2) consecutive days shall require a special event permit pursuant to Article III of Chapter 10 of the County Code.

4. Further Amendment to Agreement.

- 4.1. Among other things, the Current Agreement concerns transportation concurrency and related matters.

- 4.2. In connection with the 2026 WEC Approvals, Owners submitted a *WEC Sports Complex Traffic Impact Analysis* (the “Traffic Study”) prepared by Kittelson & Associates. County has approved the Traffic Study.
- 4.3. Within eight (8) months after the Second Amendment Effective Date, Owner shall submit to County a further amendment, or a new agreement, (either, the “Third Amendment”) addressing the impact of the 2026 WEC Approvals on the County transportation system as well as additional issues deemed appropriate by Owner and County, and shall thereafter pursue approval of such Third Amendment with due diligence.
5. **Adopted Pursuant to Florida Local Government Development Agreement Act.** This Second amendment has been adopted pursuant to the “Florida Local Government Development Agreement Act” (codified at Sections 163.3220 through 163.3243, Florida Statutes (2025)).
6. **General Provisions.**
 - 6.1. Notices. Paragraph 9.1 of the Original Agreement, as amended by paragraph 12.1 of the First Amendment, is further amended to read as set forth herein:
 - 6.1.1. All notices, requests, consents and other communications (each a “Communication”) required or permitted under the Amended Agreement shall be in writing (including emailed communication) and shall be (as elected by the person giving such notice) hand delivered by messenger or courier service, emailed or mailed by Registered or Certified Mail (postage pre-paid), Return Receipt Requested, addressed as follows or to such other addresses as any party may designate by Communication complying with the terms of this Second amendment Paragraph 6.1:
 - 6.1.1.1. If to County: County Administrator, 601 SE 25th Avenue, Ocala, FL 34471; Email: Mounir.bouyounes@marionfl.org.
 - a. With a copy to: County Planning Director, 2710 E. Silver Springs Boulevard, Ocala, FL 34470; Email: chuck.varadin@marionfl.org.
 - b. With a copy to: County Attorney, 601 SE 25th Avenue, Ocala, FL 34471; Email: matthew.minter@marionfl.org.
 - 6.1.1.2. If to Owner: Attn: Corporate Legal Department, 600 Gillam Road, Wilmington, Ohio 45177; email: none (do not use email for this address);
 - a. With a copy to: Don DeLuca, 7290 College Parkway, Suite 400, Fort Myers, FL 33907; email: ddeluca@rlcarriers.com.
 - b. With a copy to: W. James Gooding III, 1531 SE 36th Avenue, Ocala, FL 34471; email: jgooding@lawyersocala.com.
 - 6.1.2. Each such Communication shall be deemed delivered:

- 6.1.2.1. On the date of delivery if by personal delivery with signed receipt thereof;
- 6.1.2.2. On the date of email transmission if by email (subject to Second amendment Paragraph 6.1.5); and
- 6.1.2.3. If the Communication is mailed, on the earlier of: (a) the date upon which the Return Receipt is signed; or (b) the date upon which delivery is refused.
- 6.1.2.4. Notwithstanding the foregoing, service by personal delivery delivered, or by email sent, after 5:00 p.m. shall be deemed to have been made on the next day that is not a Saturday, Sunday, or legal holiday.
- 6.1.3. If a Communication is delivered by multiple means, the Communication shall be deemed delivered upon the earliest date determined in accordance with Second amendment Paragraph 6.1.2.
- 6.1.4. If the above provisions require Communication to be delivered to more than one person (including a copy), the Communication shall be deemed delivered to all such persons on the earliest date it is delivered to any of such persons.
- 6.1.5. Concerning Communications sent by email:
 - 6.1.5.1. The Communication shall not be deemed to have been delivered if the sender receives a message from the sender's or the recipient's internet service provider or otherwise that the email was not delivered or received but, if the email was sent by the sender on the last day of a deadline or other time period established by the Amended Development Agreement, the time for the sender to re-send the Communication by a different authorized means shall be extended one (1) business day;
 - 6.1.5.2. If the sender receives an automatic reply message indicating that the recipient is not present to receive the email (commonly referred to as an "out of the office message"), the email shall not be deemed delivered until the recipient returns but, if the email was sent by the sender on the last day of a deadline or other time period established by the Amended Development Agreement, the time for the sender to re-send the Communication by a different authorized means shall be extended one (1) business day;
 - 6.1.5.3. Any email that the recipient replies to, or forwards to any person, shall be deemed delivered to the recipient.
 - 6.1.5.4. The sender must print the email to establish that it was sent (though it need not do so at the time the email was sent); and
 - 6.1.5.5. The sender shall maintain the digital copy of the email in its email system for a period of no less than one year after it was sent.

6.2. Effective Date. This Second Amendment shall become effective upon the later of the following:

6.2.1. The recording of the fully executed Second Agreement in the Public Records of Marion County, Florida, as set forth in Section 163.3239, Florida Statutes; or

6.2.2. The date that the 2026 WEC Approvals become effective under applicable law including, without limitation, Section 163.3184, Florida Statutes.

7. **Effect on Current Agreement.** Except as expressly set forth herein, the Current Agreement is not amended or modified. All references herein or in the Current Agreement to “this Second amendment,” “the Agreement,” or similar terms shall be deemed to refer to the Amended Agreement.

THEREFORE, the Parties have executed this Second Amendment as of the Effective Date.

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SIGNATURES START ON NEXT PAGE**

MARION COUNTY, FLORIDA, a political subdivision of the State of Florida, by its Board of County Commissioners

By: *Carl Zalak, III*
Carl Zalak, III, Chairman

ATTEST:

Gregory C. Harrell
Gregory C. Harrell, Clerk of Court and Comptroller

For use and reliance of Marion County only, approved as to form and legal sufficiency:

Matthew Guy Minter
Matthew Guy Minter, County Attorney

STATE OF FLORIDA
COUNTY OF MARION

The foregoing instrument was acknowledged before me by means of physical presence or online notarization, this March 27, 2026, by Carl Zalak, III, as Chairman of the Board of County Commissioners of Marion County, Florida, a political subdivision of the State of Florida, on behalf of the County.



J.R. Clark
Notary Public, State of Florida
Name: Jennifer R. Clark
(Please print or type)

Commission Number: ## 726429
Commission Expires: October 3, 2029

Notary: Check one of the following:

- Personally known OR
 - Produced Identification (if this box is checked, fill in blank below).
- Type of Identification Produced: _____

Equestrian Operations, L.L.C., an Ohio limited liability company

Janna Ward
Witness

Witness

JANNA WARD

Print Witness Name

By: *Donald R. DeLuca*
Donald R. DeLuca
as Vice President, Legal

Print Witness Address:

7340 N US Hwy 27
Ocala, FL 34482

Brittany Murray
Witness

Witness

Brittany Murray

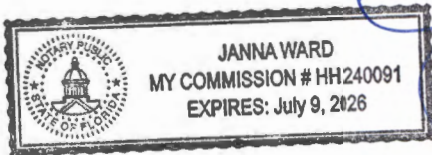
Print Witness Name

Print Witness Address:

7340 N US Hwy 27
Ocala, FL 34482

STATE OF *Florida*
COUNTY OF *Marion*

The foregoing instrument was acknowledged before me by means of physical presence or online notarization, this *March 18th*, 2026, by *Donald R DeLuca* as *VP, Legal* of Equestrian Operations, L.L.C., an Ohio limited liability company, on behalf of the company.



Janna Ward
Notary Public, State of *Florida*
Name: **JANNA WARD**
(Please print or type)

Commission Number: *4#240091*
Commission Expires: *7-9-26*

Notary: Check one of the following:

- Personally known OR
- Produced Identification (if this box is checked, fill in blank below).
- Type of Identification Produced: _____

Golden Ocala Equestrian Land, L.L.C., an Ohio limited liability company

Janna Ward
Witness
JANNA WARD

Print Witness Name

By: Donald R. DeLuca
as Vice President, Legal

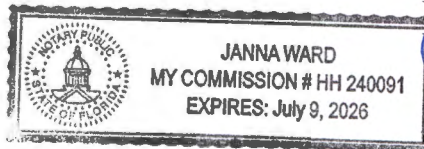
Print Witness Address: 7340 N US Hwy 27
Ocala, FL 34482

Brittany Murray
Witness
Brittany Murray
Print Witness Name

Print Witness Address: 7340 N US Hwy 27
Ocala, FL 34482

STATE OF Florida
COUNTY OF Marion

The foregoing instrument was acknowledged before me by means of physical presence or online notarization, this March 18, 2026, by Donald R. DeLuca as VP, Legal of Golden Ocala Equestrian Land, L.L.C., an Ohio limited liability company, on behalf of the company.



Janna Ward
Notary Public, State of Florida
Name: JANNA WARD
(Please print or type)

Commission Number: HH 240091
Commission Expires: 7-9-26

Notary: Check one of the following:
 Personally known OR
 Produced Identification (if this box is checked, fill in blank below).
Type of Identification Produced: _____

R.L.R. Investments, LLC, an Ohio limited liability company

Janna Ward
Witness
JANNA WARD

Print Witness Name

By: [Signature]
Donald R. DeLuca
as **Vice President and General Counsel**

Print Witness Address: 7340 N US Hwy 27
Ocala FL 34482

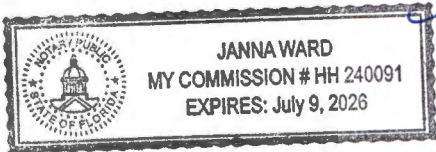
Brittany Murray
Witness

Brittany Murray
Print Witness Name

Print Witness Address: 7340 N US Hwy 27
Ocala, FL 34482

STATE OF Florida
COUNTY OF Marion

The foregoing instrument was acknowledged before me by means of physical presence or online notarization, this March 18, 2026, by Donald R DeLuca as VP + General Counsel of R.L.R. Investments, LLC, an Ohio limited liability company, on behalf of the company.



[Signature]
Notary Public, State of
Name: **JANNA WARD**
(Please print or type)

Commission Number: HH 240091
Commission Expires: 7-9-26

Notary: Check one of the following:

- Personally known OR
- Produced Identification (if this box is checked, fill in blank below).
- Type of Identification Produced: _____

Janna Ward
Witness
JANNA WARD
Print Witness Name

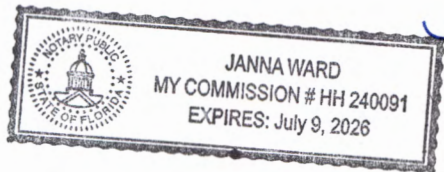
Print Witness Address: 7340 N US Hwy 27
Ocala, FL 34482

Brittany Murray
Witness
Brittany Murray
Print Witness Name

Print Witness Address: 7340 N US Hwy 27
Ocala, FL 34482

STATE OF Florida
COUNTY OF Marion

The foregoing instrument was acknowledged before me by means of physical presence or online notarization, this March 18, 2026, by Donald R DeLuca, as VP + General Counsel of Roberts Development Corporation, an Ohio corporation, on behalf of the company.



Janna Ward
Notary Public, State of Florida
Name: **JANNA WARD**
(Please print or type)

Commission Number: HH240091
Commission Expires: 7-9-26

Notary: Check one of the following:

- Personally known OR
 Produced Identification (if this box is checked, fill in blank below).
Type of Identification Produced: _____

Roberts Development Corporation, an Ohio corporation

By: Donald R. DeLuca
as Vice President and General Counsel

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STATE OF FLORIDA
DIVISION OF ADMINISTRATIVE HEARINGS

Charlotte C. Weber, Individually and
as Trustee of the Charlotte C. Weber
2001 Revocable Trust,

Petitioner,

DOAH Case No.

v.

Marion County, Florida,

Respondent.

EXHIBIT "E"

TO

PETITION FOR FORMAL ADMINISTRATIVE HEARING

MARION COUNTY TRAFFIC IMPACT ANALYSIS GUIDELINES

October 7, 2022

INTRODUCTION

Traffic Impact Analyses (TIAs) are developed to estimate the impact of new development on area roadways and identify improvements necessary to mitigate that impact. The purpose of these guidelines is to ensure TIAs are developed in a consistent manner. These guidelines assist in identifying how a development will interact with the existing transportation network, where traffic capacity constraints may occur, where transportation services are sufficient, or where extra services are required. Modes other than the private car, such as passenger transport, walking and cycling, and the ability to access services without the need to travel by car. It is well understood that land use generates trips and it is important that development occurs in the appropriate locations where the surrounding transportation network can support it.

These guidelines outline a process ensuring appropriate evaluation of transportation opportunities and constraints for proposed developments, in accordance with the Marion County Comprehensive Plan Policies, the Land Development Code, and Florida Statutes 163.

DEFINITIONS

Background Trips - The expected increase from overall growth in through traffic (traffic movements through the study area that do not have an origin or destination in the study area)

Committed Trips – Traffic associated with new development approved through the Development Review process, or for which an agreement exists providing vested rights to develop.

Diverted Trips – Existing traffic now using a segment of the roadway system not previously used by that traffic, resulting from a new development. Facilities that receive diverted trips may require an impact analysis resulting from the new development trips. In most cases, no reduction will be made for diverted trips as they are difficult to account.

Internal Capture Rate - The percentage of total trips generated by a site, made entirely within the site. The trip origin, destination, and travel path are all within the site.

Pass-by Trips – Existing traffic currently on the roadway system passing directly by a generator on the way to the primary destination. Pass-by trips can be convenience-oriented (i.e., stopping to refuel a vehicle during a commute from work). Pass-by trips are applied only to retail-oriented and certain commercial land uses that would have traveled on the roadway adjacent to those uses even if the development was not present.

Traffic Impact Analysis (TIA) - An analysis submitted as part of an application for new development, assessing traffic impacts of the subject development upon the roadway network. Marion County recognizes four levels of Traffic Impact Analysis as indicated in these Guidelines.

Vested Trips – The traffic associated with a development which has received concurrency certification per the Marion County Land Development Code or for which an agreement exists providing vested rights to develop. Vested trips are a subset of committed trips.

DEVELOPMENT PLAN REVIEW STAGES REQUIRING A TIA

A TIA submittal or approval is required with submittal or prior to approval of the listed application types. The level of TIA required is noted per application type.

<u>Application Type</u>	<u>Level of Analysis Required</u>	<u>Notes</u>
Comprehensive Plan Amendment	Level of Service Analysis	<ol style="list-style-type: none"> 1. A methodology is not required. 2. The analysis shall be submitted as part of the Comprehensive Plan Amendment Application 3. The analysis must be approved by the County no later than two weeks before the Public Hearing at the Board of County Commissioners
Rezoning (with either a Concept plan or Master plan)	Traffic Statement, Traffic Assessment, or Traffic Study	<ol style="list-style-type: none"> 1. If required, a methodology must be approved prior to conducting the analysis and before submitting the rezoning application. 2. The methodology is submitted through Development Review. 3. The analysis must be approved no later than two weeks before the Public Hearing at the Board of County Commissioners.
Master Plan	Traffic Statement, Traffic Assessment, or Traffic Study	<ol style="list-style-type: none"> 1. Only required if an analysis has not been completed at a previous level of approval or the previous analysis requires updating. 2. If required, a methodology must be approved prior to conducting the analysis.
Site Plan (Major or Minor)	Traffic Statement, Traffic Assessment, or	<ol style="list-style-type: none"> 1. Only required if an analysis has not been completed at a

	Traffic Study	<p>previous level of approval or the previous analysis requires updating.</p> <p>2. If required, a methodology must be approved prior to conducting the analysis.</p>
Preliminary Plat	Traffic Statement, Traffic Assessment, or Traffic Study	<p>1. Only required if an analysis has not been completed at a previous level of approval or the previous analysis requires updating.</p> <p>2. If required, a methodology must be approved prior to conducting the analysis.</p>
Improvement Plan	Traffic Statement, Traffic Assessment, or Traffic Study	<p>1. Only required if an analysis has not been completed at a previous level of approval or the previous analysis requires updating.</p> <p>2. If required, a methodology must be approved prior to conducting the analysis</p>

DOCUMENT SUBMITTAL

All TIA’s shall provide documentation and data to support the analysis and conclusions of the study. All Synchro, HCS, or other traffic modeling application files shall be provided to the County upon request.

All Methodologies, Traffic Studies, and Traffic Assessments shall be submitted through the County’s electronic plan review process. Any applicants requiring access shall contact the Development Review Office within the Office of the County Engineer. The methodologies require a separate application from the Traffic Assessments and Traffic Studies. Traffic Impact Statements are included with the plan review and do not require a separate review.

The Level of Service Analyses shall be submitted to the Growth Services Department as a part of the Comprehensive Plan Amendment application.

ANALYSIS LEVEL

For the purpose of determining what level of analysis must be completed, the following thresholds have been established:

Level of Service Analysis – Projects generating a maximum potential impact of **100** peak hour trips or more and requiring a Comprehensive Plan Amendment.

Traffic Statement – Projects generating fewer than **50** peak hour trips

Traffic Assessment – Projects generating from **50 to 99** peak hour trips. Unless the project has a 4% or more impact (% project traffic to adopted LOS volume) on a roadway that has an existing v/c ratio of 0.80 or more, in which case a Traffic Study is required.

Traffic Study – Projects generating **100** or more peak hour trips. For projects where all impacted roadways are below 0.50 v/c a Traffic Assessment is all that is required with the exception of those projects increasing the v/c ratio on an impacted roadway by 20% or more.

METHODOLOGY REQUIREMENTS

A Level of Service Analysis does not require a detailed methodology; however, the consultant shall coordinate with the Office of the County Engineer prior to conducting the Level of Service Analysis.

Traffic Statements do not require a detailed methodology. The Traffic Statement must be provided as a part of the plan review package.

Traffic Assessments and Traffic Studies require approval of a detailed Methodology in advance of submittal. At a minimum, the Methodology shall detail the following items:

- ❖ Description of the Proposed Development
- ❖ Analysis Timeframe
- ❖ Analysis Period
- ❖ Assumptions for Trip Generation - pass-by, internal capture, distribution, mode split and trip assignment
- ❖ Study Area
- ❖ Existing Conditions Inventory
- ❖ Existing Traffic
- ❖ Background Traffic
- ❖ Committed Traffic
- ❖ Planned Improvements (To be included as part of analysis)

DESCRIPTION OF PROPOSED DEVELOPMENT

The applicant shall provide a brief overview of the proposed development including location map depicting major streets, type of use, and density/intensity.

ANALYSIS TIMEFRAME

The methodology shall include a build-out schedule. For phased projects, the years included in the analysis period should correspond to the phasing schedule. Projects with more than a five-year build-out may be required to conduct interim traffic study as an update to the original traffic study and included in the development agreement (this should be tied to concurrency and the requested reservation of trips).

ANALYSIS PERIOD

The analysis shall be based on the peak hour which typically occurs during the PM period of a typical weekday. However, the analysis period should be related to the known and anticipated peaking patterns of the transportation system and development traffic. If this period is not adequate, the period selected should be the period of the highest combination of development and background traffic. Depending on the type of land use and local characteristics, study of both AM and PM peak hour may be required. Required study times to be included in the analysis will be determined by the County

TRIP GENERATION

Trip generation shall be based on the latest edition of the *ITE Trip Generation Manual*. The use of ITE rates or equations shall be determined using the *FDOT Transportation Impact Handbook*. When the land use categories and descriptions of the *ITE Trip Generation Manual* clearly do not apply or the rates are not appropriate for a proposed development, locally derived trip generation rates developed by the applicant may be used as approved by the County. Trip generation rates that are based on local conditions should be developed according to the methodology described in the *ITE Trip Generation Manual*. The use of alternative trip generation studies shall be identified as part of the initial methodology for approval.

INTERNAL CAPTURE - It is recognized that certain mixed-use projects may have traffic circulation among various uses within the subject property, which are not using the public roadway system. If internal capture is considered for reduction in the impact, credit the internal capture trips first and then apply the pass-by percentage to calculate total new trips. The internal capture traffic may be credited against the total new external project trips. The use of internal capture rates requires that internal roadways be present at the time of impact. Internal capture rate should also be used where land uses share parking facilities. The total trip generation from the site will be less than would be estimated by summing the estimated trip generation, if each of the land uses were estimated individually and summed. Internal capture rates shall be calculated and documented based on the recommended procedures of the *ITE Trip Generation Manual* and the *FDOT Transportation Impact Handbook*.

PASS-BY TRIPS – The use of site specific pass-by studies conducted in accordance with ITE procedures may also be allowed upon approval from the appropriate staff. The studies must be proposed and approved in the methodology stage of the traffic analysis.

With respect to pass-by trips, the total driveway or adjacent intersection volumes are not reduced. However, the number of new trips added to the roadway network resulting from the proposed development is reduced accordingly. Pass-By trip rates shall be calculated and based on the recommended procedures of the *ITE Trip Generation Manual* and the *FDOT Transportation Impact Handbook*.

DIVERTED TRIPS - If a project proposes diverted trips, the total driveway volumes shall not be reduced and these trips shall count as new trips where the travel road segments to reach the project site that they did not previously travel. The calculations for diverted trips shall be provided as part of the methodology and approved by the County prior to inclusion in the traffic analysis. Diverted trip rates shall be

calculated and based on the recommended procedures of the *ITE Trip Generation Manual* and the *FDOT Transportation Impact Handbook*.

MODE SPLIT - This section addresses the anticipated use of alternative modes of travel (non-auto) between origin and destination zones. Any mode split calculations shall be applied as applicable based upon FDOT procedures, as outlined in the *FDOT Transportation Impact Handbook* for determining mode split within a defined study area. The applicant will be required to provide justification for any transit, pedestrian or bicycling trips that are used to reduce the overall number of vehicular trips in the study.

TRIP DISTRIBUTION – Trip distribution may be performed using manual techniques as approved by the County or by using the latest version of the Central Florida Regional Planning Model (CFRPM) adopted by the Ocala/Marion County Transportation Planning Organization (TPO). The trip distribution methodology should consider the area population, locations of similar land use, known traffic trends and travel distances. Trips should be assigned based on logical routing patterns to the major street network which includes those corridors classified as collectors and above. The exception to this rule is that trips may be assigned to the local street system when the local streets provide direct access to the proposed development.

No distribution plan should differ more than 10% from the existing traffic pattern unless approved by the County. Any modifications to the CFRPM files shall be clearly explained within the text of the traffic analysis and all electronic files shall be submitted with the traffic analysis.

All trip distribution methodologies shall remain consistent with methods outlined in the *FDOT Transportation Impact Handbook*. The County will determine if the proposed distribution is reasonable.

TRIP ASSIGNMENT - Total traffic shall be calculated and trip assignments for the net trips made for each link and intersection within the project's study area. The assignments shall address phasing and cover the build-out period of the project. An existing and future turning movement map shall be included in the analysis. The turning movement maps shall show the existing traffic volumes, the background traffic volumes, any known project traffic volumes, and the project traffic volumes. Turning movement maps shall be completed for all intersections within the study area and shall correspond to the trip generation and trip assignment portions of the Traffic Study. All trip assignment methods shall be consistent with the *FDOT Transportation Impact Handbook*.

STUDY AREA

The study area shall include any public roadway where the net new traffic from the proposed project is at least 3% of the maximum service volume (based on the FDOT Generalized Level of Service) of the roadway plus one segment beyond. In addition, all roadways having a LOS below the adopted LOS standard shall be included in the study area unless the impacts are 'de minimis'. A map illustrating the study area shall be included along with a table listing pertinent road data (i.e. current traffic count, LOS standard and service volume, V/C ratio, area type, number of lanes, etc.) for each segment. The identified road segments shall be consistent with the TPO Roadway Segment Database. The map should clearly depict the traffic assignment to each

roadway. In addition, a list of each signalized and/or major un-signalized intersection shall be included.

EXISTING CONDITIONS INVENTORY

Existing roadway conditions shall be included for all impacted corridor segmentation within the study area and one segment beyond. The existing roadway conditions data shall be consistent with all corridor data from the Ocala/Marion County TPO Roadway Segment Database.

Data to be included in the existing conditions inventory by roadway segment shall include: adopted LOS standard, adopted LOS capacity, existing LOS, current traffic counts, background traffic volumes, number of lanes, FDOT group classifications & existing v/c ratios.

EXISTING TRAFFIC

The yearly traffic counts from the most current TPO's *Ocala/Marion County Annual Traffic Counts & Trends Manual* and the Congestion Management System Counts maintained by the TPO shall be used to determine the study area only.

It may be necessary for the applicant to conduct additional traffic counts to provide current traffic counts where there are outdated (older than one year) or no traffic counts are available. Additional counts may also be needed if there have been any changes to the transportation system that may compromise the integrity of a particular count location (construction, development, etc.) since the last counts were taken.

All counts shall include peak hour information for segment and intersection analysis and shall be obtained at the time that best coincides with the peak period to be analyzed. The peak should be the period with the highest combined street and site generation traffic volumes. FDOT seasonal factor shall not be applied to reduce volumes. For retail development on S.R. 200 and S.R. 464 applicants will be required to consider more than the weekday PM peak, because the weekend peak traffic may exceed the weekday peak traffic even though the through volumes on the segment may be less. Traffic counts may be needed to determine the appropriate analysis period in some cases.

BACKGROUND TRAFFIC

The proposed project build out year must be established. Background traffic shall be developed by applying the annual growth rate for the roadway segment to the existing traffic counts, and then compounded annually through the build out year for the project.

The applicant shall use the most current traffic counts available in the annual *Ocala/Marion County TPO Traffic Counts & Trends Manual* to develop background traffic rates.

COMMITTED TRAFFIC

Committed development traffic from vested projects, projects that have received Development Review Committee (DRC) approval shall be included. The project and the

amount of committed trips shall be identified as part of the initial methodology. Assignment of the committed trips is not necessary as part of the initial methodology, but is required as part of the analysis.

PLANNED IMPROVEMENTS

Any improvements not yet constructed but anticipated to be used as part of the analysis shall be identified. The improvements include construction within the first three years of the FDOT Work Program or a local government Capital Improvement Program or improvements identified as part of an enforceable developer's agreement or DRI development order.

UNIQUE FACTORS

Unique or anomalous factors, and consultant recommendation to address them in any traffic analysis, must be clearly identified and documented. Final determination of the appropriate process to address unique or anomalous factors arising in any traffic analysis is at the discretion of the County.

TRAFFIC IMPACT ANALYSIS REQUIREMENTS

REQUIRED CONTENTS OF A LEVEL OF SERVICE ANALYSIS

1. **Introduction** – The introduction should include a description of the type, size, location, and expected build-out of the proposed development.
2. **Factors Used in Analysis** – Include a list of factors and assumptions made in the analysis including but not limited to build-out timeframe, phasing, growth rate, internal capture, pass-by percentage, truck percentage, etc.
3. **Study Area** - The study area shall include any public roadway where the net new traffic from the proposed project is at least 3% of the maximum service volume (based on the FDOT Generalized Level of Service) of the roadway. All signalized intersections within a one mile radius of the project or the nearest signalized intersection if one is not located within the one mile radius shall also be included in the analysis.
4. **Level of Service Analysis** – The Level of Service Analysis shall include an analysis of the existing conditions including the maximum trip impact based on the current land use, an analysis of the maximum trip impact of the proposed land use, and an analysis of the trip impact generated by the proposed or most likely development plan. The analysis shall include all roadway links and intersections in the study area. The roadway link analysis shall be presented in a tabular format showing the adopted level of service standard and volume based on the FDOT Generalized Tables and the Ocala-Marion TPO Congestion Management Plan. Existing traffic volumes shall come from the TPO Traffic Counts manual.

The segment analysis shall be based on peak hour-peak direction traffic volumes. The future conditions shall include all committed traffic from development within

the study area, project traffic, and background traffic to account for the growth in traffic over the build-out timeframe. The growth rate for the background traffic shall come from the TPO Traffic Counts Manual

The intersection analysis shall utilize HCS or Synchro. Turning movement counts shall be conducted in the PM Peak Hour.

The analysis shall be summarized in tabular format showing the classification, lanes, adopted LOS, MSV, existing traffic, background traffic, committed traffic, project traffic, total future volume, and future LOS. A map showing the Level of Service for each roadway segment under each scenario shall also be provided.

5. **Conclusions/Mitigation Analysis** – The conclusion/mitigation analysis shall summarize the overall impact of the proposed development on the study area and identify specific improvements needed, timing for construction of those improvements, and the entity responsible for payment of the improvements.
6. **Appendices** – All supporting documentation shall be included in the appendices. Where other documentation (methodology or other professional documents) are used by reference, specific citations shall be included in the text of the Traffic Study.

REQUIRED CONTENTS OF A TRAFFIC IMPACT STATEMENT

The Traffic Impact Statement shall include at a minimum the following components to be considered complete:

1. Trip generation based on the latest edition of the ITE Trip Generation manual.
2. Site access review including the most current site plan.
3. Access management.

Note: If a known safety issue or intersection capacity issue exists on the fronting segment, the County may require detailed a safety analysis or intersection analysis as part of the Traffic Statement.

REQUIRED CONTENTS OF A TRAFFIC ASSESSMENT

1. **Introduction** – The introduction should include a description of the type, size, location and expected buildout of the proposed development.
2. **Existing Conditions Analysis** - The existing condition analysis shall include an analysis of the existing conditions within the study area.
3. **Project Analysis** – The project analysis shall include all relevant information about the project i.e.: trip generation, distribution, pass-by rate, etc. The analysis shall also contain a map illustrating the proposed site access and circulation from internal parking/roadways to the public roadway system. The analysis shall also include preliminary proposals for addressing access management.

4. **Future Conditions Analysis** – The future conditions analysis shall include a complete analysis of the impact of the proposed project and all other background growth on the study area.
5. **Conclusions/Mitigation** – The conclusion/mitigation section shall summarize the overall impact of the proposed development on the study area and identify specific improvements needed, timing for those improvements, and responsibility of paying for the improvements. Detailed cost estimates will also be required.
6. **Appendices** – all supporting documentation shall be included in the appendices. Where other documentation (methodology or other professional documents) are used by reference, specific citations shall be included in the text of the Assessment.

REQUIRED CONTENTS OF A TRAFFIC STUDY

The Traffic Study shall include at a minimum the following components to be considered complete:

1. **Introduction** – The introduction should include a description of the type, size, location, and expected build-out of the proposed development.
2. **Existing Conditions Analysis** - The existing conditions analysis should be presented in a tabular format and should constitute a review of the current conditions in the study area without trips generated by the proposed development.
3. **Intersection and Segment Analysis Table** - A list of intersections and segments within the study area that were analyzed.
4. **Project Analysis** – The project analysis shall be based upon the results from traffic volume estimates, directional distributions and total traffic projections. The study area segments, intersections and the site access shall be evaluated for capacity constraints and operating conditions. These evaluations shall be performed utilizing the most current version of the FDOT HCS or SYNCRO software packages for signalized and unsignalized intersections and the FDOT Generalized LOS Tables for roadway segments. If applicable, a traffic signal warrants analysis shall be performed for the main site access driveway using the criteria that has been set forth in the FHWA Manual on Uniform Traffic Control Devices (MUTCD).
5. **Future Conditions Analysis** – A complete future conditions analysis shall be included in the study. The future conditions analysis shall include all roadway links and intersections analyzed in the existing conditions section of the study and shall also include a peak hour/peak direction LOS analysis showing the future roadway conditions (segment and intersection if required) after applying the background traffic, the proposed project traffic, and any improvements.

Additionally, future conditions table and a future turning movement illustration shall also be included in all traffic studies. The future conditions table shall be consistent with the existing conditions table and provide analysis for roadway segments and

intersections within the study area. The table shall at a minimum include information such as: functional classification, FDOT Generalized LOS Tables classifications, LOS capacity future projected traffic volumes, and the projected LOS (peak hour/peak direction for both weekdays). In certain cases, a Saturday analysis may be required. Segments identified in the future conditions table shall be consistent with those identified in the existing LOS Table. The applicant shall perform the analysis for all intersections and segments within the study area and compare the existing intersections peak hour segment with the projected intersections peak hour segments calculating the estimated LOS and v/c ratios.

A future turning movement illustration shall be included as part of the analysis. The illustration shall show the individual movements for the project traffic, projected background traffic, other project(s) as determined by the senior reviewer and the total traffic.

6. **Conclusions/Mitigation Analysis** – The conclusion/mitigation analysis shall summarize the overall impact of the proposed development on the study area and identify specific improvements needed, timing for construction of those improvements, and the entity responsible for payment of the improvements.
7. **Equivalency Matrix** – Provide an equivalency matrix for other likely land uses consistent with the developments approved land use and zoning showing the trip conversion rates between the uses in the study and the other allowable uses. All rates shall be based on the most recent edition of the ITE Trip Generation Manual.
8. **Appendices** – All supporting documentation shall be included in the appendices. Where other documentation (methodology or other professional documents) are used by reference, specific citations shall be included in the text of the Traffic Study.

MITIGATION

MITIGATION IMPACTS (GENERAL)

The key role of the traffic study is to ensure that the developments are designed and implemented in such a way that they promote access by all modes and manage demand to avoid unacceptable impacts on city, county and state roadway networks. Depending on the nature and scale of the development, this may require a combination of measures to promote all mode access and minimize extra vehicle traffic that may be generated by the development. Scenarios shall be designed to give greater emphasis to access by pedestrians, cyclist and public transportation. Such measures may mean changing the location of a building and/or parking within a site, diverting/providing bus services or supplementing the level of passenger transport to the site.

INTERSECTIONS AND SEGMENTS MITIGATION

All proposed improvements shall include a mitigation analysis section that mirrors the information provided in the future conditions table (specifically, to provide a LOS analysis based upon the identified improvements). The County may consider extending credits for signalization and intersection improvements that address failures at all impacted intersections to an operational level that ‘significantly’ improves the overall LOS to a level where that intersection operates more efficiently than the existing conditions analysis indicated. It is feasible that multiple ‘significant’ improvements to some intersections within a study area may offset the increased delay at other non-improved intersections within the study area, which could result in increased efficiency of the overall system. In addition, the mitigation analysis shall include cost estimates for design, construction, and right-of-way acquisition for each identified improvement.

TRAFFIC SIGNAL MITIGATION

Where the developer has proposed changing signal timings to accommodate more through traffic by reducing side-street green light timing, the issue of maintaining the adopted LOS for all turning movements at an intersection must also be addressed by the following:

1. All signalized intersection future analysis recommendations shall maintain the adopted level of services, and the v/c ratio shall remain less than 0.99 on all approach movements. The intersection movement rate of flow cannot exceed the roadway segment volume vehicle per hour.
2. If optimization of traffic signal timing is used to mitigate a failed level of service the side street g/C ratio cannot be adjusted down more than 20%.
3. If the aforementioned thresholds cannot be maintained then the signal system shall be re-timed to accommodate the additional volume on the main roadway.
4. All signalized intersection calculations shall use the existing timing (minimum/maximum green) for a base to estimate future timing patterns. Existing timing shall be obtained through the city or county Traffic Engineering departments.
5. For planning purposes the existing signal minimum/maximum timing shall be used to determine the existing and future LOS.

PROPORTIONATE SHARE PROCEDURES

Any offsite capacity improvements including but not limited to turn lane construction, roadway widening, and signalization may be subject to a proportionate share payment. However, any site access and safety improvements are the sole responsibility of the development.

The calculations for the proportionate share contribution shall be determined based on the ratio of the capacity created by the improvement to the total number of project trips assigned to the improvement. All calculations shall be based on peak hour traffic. The formula for this calculation is as follows:

- $\text{Proportionate Share \%} = (\text{project trips} / \text{improvement trips}) * 100$

For example, the traffic analysis identifies the need for an additional turn lane that will create an additional capacity of 100 trips and the project is contributing 20 trips to the new turn lane. The proportionate share percentage would be calculated as follows:

- $(20 \text{ new trips} / 100 \text{ additional capacity}) * 100 = 20\%$

In this example the applicant would be responsible for a 20% contribution for the final cost of the improvement. For projects that identify operational improvements such as changing signal phasing and signal installation, the entire cost (i.e., engineering design, corridor development study, etc) shall be the sole responsibility of the applicant.

TRAFFIC ANALYSIS SOFTWARE

HCS / SYNCRHO

The most current version of the FDOT HCS or SYNCHRO software packages shall be used for those developments intending to submit an analysis for the purpose of determining the capacity of an intersection. The analysis shall document and source any changes to the default values of the software in the text of the traffic study. Use an average of the approach peak hour factor (PHF) at existing intersections to determine the intersection PHF for use in analysis. All capacity calculations shall use existing signal timing. For those intersections for proposed signals 120-second cycle with minimum phase lengths shall be used.

TRAFFIC TRENDS ANALYSIS TOOL

Future conditions outputs from the CFRPM travel demand model should be checked for reasonableness before using the projected traffic volumes for operational analysis. Historic volumes should be input into the FDOT Traffic Trends Analysis tool to generate future volumes for comparison to CFRPM future conditions outputs.

MIXED USE & UNIQUE DEVELOPMENT ANALYSIS

MULTI-MIXED USE DEVELOPMENT ANALYSIS

Where a small individual land use development is located within a larger development the methodology for site impact analysis for the entire development is to address each land use independently and sum the resulting trip generation.

SPECIAL/UNIQUE DEVELOPMENT ANALYSIS

When a development is analyzed that cannot be adequately described by ITE, the development generation data will be based on type, intensity and timing of trips to be generated. County staff will recommend the trip generation characteristics that are appropriate for the analysis. However, the applicant may recommend a trip generator with supporting documentation for staff approval prior to use.

STATE OF FLORIDA
DIVISION OF ADMINISTRATIVE HEARINGS

Charlotte C. Weber, Individually and
as Trustee of the Charlotte C. Weber
2001 Revocable Trust,

Petitioner,

DOAH Case No.

v.

Marion County, Florida,

Respondent.

_____ /

EXHIBIT "F"

TO

PETITION FOR FORMAL ADMINISTRATIVE HEARING

EXHIBIT F
CONSISTENCY ANALYSIS

1 **INTRODUCTION**

2
3 *The Marion County Future Land Use Element Goals, Objectives and Policies are designed to provide a*
4 *comprehensive, area-wide vision for sustainable urban, suburban and rural growth that supports a*
5 *transportation network, variety of land uses, natural and agricultural resources, and open space. The 2045*
6 *Future Land Use Map and the Goals, Objectives and Policies established herein, shall guide the future*
7 *development of areas throughout the County to insure that such future development supports the vision*
8 *and development pattern of Marion County in a sustainable manner.*
9

10 **GOAL 1: PURPOSE OF THE FUTURE LAND USE ELEMENT**

11 **To protect the unique assets, character, and quality of life in the County through the**
12 **implementation and maintenance of land use policies and a Land Development Code (LDC) that**
13 **accomplish the following:**

- 14
- 15 **1. Promote the conservation and preservation of natural and cultural resources;**
- 16 **2. Support and protect agricultural uses;**
- 17 **3. Protect and enhance residential neighborhoods while allowing for mixed-use**
18 **development within the county;**
- 19 **4. Strengthen and diversify the economic base of the County;**
- 20 **5. Promote development patterns that encourage an efficient mix and distribution of uses**
21 **to meet the needs of the residents throughout the county;**
- 22 **6. Ensure adequate services and facilities to timely serve new and existing development;**
23 **and**
- 24 **7. Protect and enhance the public health, safety, and welfare.**
- 25 **8. Protect private property rights.**
- 26

CONSISTENCY: THE PROPOSED AMENDMENT FURTHERS THE COUNTY’S COMPREHENSIVE PLAN BY PROVIDING A PROJECT THAT SERVES THE EQUESTRIAN COMMUNITY WITH A MIXED USE DEVELOPMENT, INCLUDING AN EQUESTRIAN FACILITY. THE AMENDMENT IS ALSO SUPPORTED BY A SUITABILITY ANALYSIS DEMONSTRATING THAT THE SITE IS SUITABLE FOR URBAN DEVELOPMENT.

27
28 **OBJECTIVE 1.1: PLANNING FRAMEWORK**

29 To create a planning and implementation strategy that will enhance the livability of the County and
30 preserve the County’s natural, cultural, physical and economic resources to discourage urban
31 sprawl, promote sustainable, energy-efficient land use patterns, and reduce pollution, and provide
32 for economic development opportunities.

33
34 **Policy 1.1.1: Marion County Planning Principles**

35 The County shall rely upon the following principles to guide the overall planning framework for the County:

- 36
- 37 **1. Preserve, protect and manage the County’s valuable natural resources.**

EXPLAINS WHY THE COMMERCIAL ACREAGE IS NEEDED TO SUPPORT THE EQUESTRIAN FACILITY, THE GOLDEN OCALA PROJECT AND THE LARGER EQUESTRIAN COMMUNITY.

1
2 **Policy 2.1.2: Land Use Requirements**

- 3 1. The Future Land Use Map Series shall designate areas for the uses listed in Table 2-1 and further
4 described in Policy 2.1.13 through Policy 2.1.25. Density and intensity shall be calculated on a
5 gross acreage basis unless otherwise noted. Outside of the UGB or PSAs, the Development Review
6 Committee may grant a step-down density of one FLU designation where insufficient
7 infrastructure exists to support development at the designated density. For example, parcels
8 designated Medium Residential may be developed as Low Residential with DRC approval in these
9 areas. The Future Land Use Map will be updated to reflect such approvals, coincident with
10 recording the Final Plat.
11
12 2. Maximum density will not be exceeded except through density and/or intensity bonus programs
13 including averaging, TDCs or Planned Service Area (PSA) incentives.
14

CONSISTENCY: THE PROPOSED AMENDMENT DOES NOT EXCEED THE MAXIMUM DENSITIES AND INTENSITIES AS ESTABLISHED IN THE COUNTY'S COMPREHENSIVE PLAN AND LDC.

15
16 **Policy 2.1.4: Open Space Requirement**

17 A minimum of 350 square feet of open space for each residential lot shall be required in either single or
18 linked multiple tracts, within residential development and the open space shall be accessible to all
19 residents within the development, as further defined in the LDC.
20

CONSISTENCY: GOLDEN OCALA MUST ADDRESS THE REQUIREMENTS OF THE COUNTY'S PLAN AND LDC INCLUDING MINIMUM OPEN SPACE REQUIREMENTS.

21
22 **Policy 2.1.5: Permitted and Special Uses**

23 The County shall identify permitted and special uses for each land use designation and zoning
24 classification, as further defined in the Comprehensive Plan, Zoning, and LDC.
25

CONSISTENCY: GOLDEN OCALA WILL IDENTIFY AS PART OF ITS LOCAL DEVELOPMENT APPROVAL THE USES PROPOSED WHICH MUST BE CONSISTENT WITH THE COUNTY'S COMPREHENSIVE PLAN AND LDC.

26
27 **Policy 2.1.6 Protection of Rural Areas**

28 Rural and agricultural areas shall be protected from premature urbanization and a vibrant rural economy
29 shall be encouraged outside the UGB and Planned Service Areas. Urban and suburban uses incompatible
30 with agricultural uses shall be directed toward areas appropriate for urban development such as within
31 the UGB and PSAs.
32

33 **Policy 2.1.7 Conversion of Rural Lands**

1 Applications for conversion of agricultural properties designated as Rural Land on the Future Land Use
2 Map to a mixed use, industrial, commercial or residential future land use category shall demonstrate the
3 following:

- 4
5 1. The amendment will not result in urban sprawl as defined in Chapter 163, Part II, Florida Statutes;
- 6
7 2. Availability of public infrastructure, including public water and sewer and transportation facilities
8 to serve a more dense or intense use is available at the time of application; or will be available at
9 concurrently with development.
- 10
11 3. The relationship of the proposed amendment site to the UGB boundary and other more densely
12 or intensely designated or developed lands.

13 The Board of County Commissioners may require that such conversion is conducted through the Transfer
14 of Development Rights program.

15
CONSISTENCY: THE PROPOSED AMENDMENT IS CONSISTENT WITH AND FURTHERS THE COMPREHENSIVE PLAN BY PROTECT EXISTING AGRICULTURAL AREAS ON THE EDGE OF GOLDEN OCALA. THE AMENDMENT ALSO PROVIDES THE REQUIRED SUPPORTING ANALYSIS DEMONSTRATING THAT THE AMENDMENT DOES NOT RESULT IN URBAN SPRAWL AND THAT PUBLIC FACILITIES ARE AVAILABLE TO SUPPORT THIS AMENDMENT.

16
17
18 **Policy 2.1.13: Protection of Rural Neighborhoods**

19 Marion County shall recognize “rural neighborhoods” that occur within or outside of the UGB deserve
20 special protection from the intrusion of urban uses, densities and intensities where new development
21 occurs within the immediate vicinity. For the purpose of this policy, a rural neighborhood is an existing
22 recorded or unrecorded subdivision where the overall density does not exceed one unit per three acres
23 and the subdivision has a predominant Future Land Use Designation of Rural Land or Low Residential.

24
CONSISTENCY: THE PROPOSED AMENDMENT IS CONSISTENT WITH THIS POLICY BY DIRECTING URBAN DEVELOPMENT TO ALREADY APPROVED AREAS, STEPPING DOWN DENSITY/INTENSITY ON THE EDGE THROUGH LOW DENSITY, EQUESTRIAN ESTATE LOTS AND RURAL LOTS, AND REDUCING THE OVERALL DENSITY OF THE PROJECT.

25
26 **Policy 2.1.14: General definitions for uses:**

- 27
28 1. **Agricultural Use:** Any generally accepted, reasonable, and prudent method for the operation of
29 a farm, including, but not limited to, horticulture; floriculture; viticulture; forestry; dairy;
30 livestock; poultry; bee; pisciculture, if the land is used principally for the production of tropical
31 fish; aquaculture, including algaculture; sod farming; all forms of farm products as defined in
32 Section 823.14(3), F.S. and farm production. Agricultural Lands are classified as such pursuant to
33 Section 193.461, F.S.

- 1 3. **Hamlets:** Residential uses in the Rural Areas outside the UGB and not within the FPA may develop
2 as a hamlet development under the PUD process and shall provide a minimum of 60% permanent
3 open space with cluster development in one of the following forms, and as further defined in the
4 LDC:
5 a. one (1) dwelling unit per five (5) acres
6 b. one (1) dwelling unit per 3.5 acres with the permanent open space delineated as a separate
7 tract from the individual developable parcels and shall remain under common ownership by
8 the developer, property owner association, undivided property interest of the developable
9 land within the hamlet, or a third party approved by the County Commissioners.

10
11 **RESIDENTIAL USES**

12 **Policy 2.1.17: Low Residential (LR)**

13 This land use designation is intended to recognize areas suited for primarily single-family residential units
14 for existing and new development within the UGB, a PSA or Urban Area. Parcels outside of, but contiguous
15 to the UGB and outside of the FPA are eligible for conversion to Low Residential designation through
16 density bonus programs consistent with FLU Policy 2.1.3. The density range shall be up to one (1) dwelling
17 unit per one (1) gross acre, as further defined in the LDC. This land use designation is an Urban Area land
18 use.

19 Where Low Residential abuts the Farmland Preservation Area or other Rural Area, hamlet, clustered or
20 other development methods to preserve large tracts of open space are encouraged.

21

<p>CONSISTENCY: THE PROPOSED AMENDMENT WILL LOCATE LOW RESIDENTIAL LANDS ON THE EDGE OF THE GOLDEN OCALA DEVELOPMENT WHICH IS ALSO ON THE EDGE OF THE COUNTY'S URBAN GROWTH BOUNDARY. THESE EDGE LOTS WILL BE AT A LOWER DENSITY WHICH WILL INCLUDE EQUESTRIAN ESTATE LOTS (1 UNIT PER 3 ACRES) AS WELL AS A TRANSITION FROM THE CORE OF GOLDEN OCALA TO THE EDGE OF THE DEVELOPMENT WHERE RURAL USES ARE PLANNED AS PART OF THE COUNTY'S FARMLAND PRESERVATION AREA.</p>
--

22
23 **Policy 2.1.18: Medium Residential (MR)**

24 This land use designation is intended to recognize areas suited for primarily single-family residential units
25 within the UGB, PSAs and Urban Area. However, the designation allows for multi-family residential units
26 in certain existing developments along the outer edges of the UGB or Urban Area. The density range shall
27 be from one (1) dwelling unit per one (1) gross acre to four (4) dwelling units per one (1) gross acre, as
28 further defined in the LDC. This land use designation is an Urban Area land use.

29
30 **Policy 2.1.19: High Residential (HR)**

31 This land use designation is intended to recognize areas suited for a mixture of single-family and
32 multi-family residential units to recognize existing and new development that is located within the UGB
33 or Urban Area. The density range shall be four (4) dwelling units to eight (8) dwelling units per one (1)
34 gross acre, as further defined in the LDC. This land use designation is an Urban Area land use.

35
36 **Policy 2.1.20: Urban Residential (UR)**

37 This land use designation is intended to recognize areas suited primarily for multi-family residential units,
38 but allows for single-family residential units to provide for a mix of various housing types to meet the

1 **Policy 3.1.1: Establishment of UGB**

2 The County FLUM Series, Map #1, *Marion County 2045 Future Land Use Map*, designates an UGB that
3 reinforces the preferred land use patterns of Marion County through policies that are designed to effectively
4 discourage the proliferation of urban sprawl. The establishment and maintenance of the UGB shall be
5 accomplished through the following standards:
6

- 7 1. The UGB shall encompass a sufficient supply of urban designated land to support projected demand
8 for the horizon of the plan, less the supply generated from vested subdivisions (DRIs, FQDs, etc.)
9 and Rural Land
- 10 2. All new development within the UGB shall be served by central water and wastewater, whether it
11 is provided by the county, municipality, or private provider;
- 12 3. All land contained within an UGB delineated on the Future Land Use Map shall be treated as one
13 single urban area for the purposes of these policies;
- 14 4. Any parcel of land that overlaps the UGB by more than 50% by area shall be considered inside the
15 Boundary. Likewise, any parcel that overlaps the UGB by 50% or less shall be considered outside
16 the Boundary;
- 17 5. The County shall conduct a review at least every seven (7) years to assess the need to modify the
18 UGB and evaluate the need for public facilities and services within the UGB; and
- 19 6. The County shall encourage development to be concentrated within the UGB.
20

CONSISTENCY: THE PROPOSED AMENDMENT PROVIDES A SUPPORTING ANALYSIS FOR THE 118 ACRES PROPOSED TO BE ADDED TO THE COUNTY'S URBAN GROWTH BOUNDARY. THE EXPANSION AREA IS DIRECTLY ADJACENT TO THE URBAN GROWTH BOUNDARY, HIGHER RESIDENTIAL INTENSITY LANDS ARE DIRECTLY ADJACENT TO THE EXPANSION AREA AND THE LANDS ARE TO BE PART OF A LARGER GOLDEN OCALA MASTER PLAN WHICH WILL SERVE TO CREATE A MASTER PLAN FOR THIS PORTION OF THE COUNTY. THIS MASTER PLAN INCLUDES LOWER DENSITIES (INCLUDING EQUESTRIAN ESTATE LOTS AND RURAL LOTS) ALONG ITS BOUNDARY TO SERVE AS A TRANSITION TO THE ADJACENT FARMLAND PRESERVATION AREA.

21
22 **Policy 3.1.2: Planning Principles within UGB**

23 The County shall implement long-term planning principles to guide the creation of land use policy and
24 development regulations within the County, which shall be implemented through the policies contained in
25 the County Comprehensive Plan and as further defined in the LDC. These principles shall include:
26

- 27 1. Preserve open space, natural beauty and critical environmental areas.
- 28 2. Allow for a mix of land uses to create compact residential, commercial, and employment hubs.
- 29 3. Strengthen and direct development towards existing communities and development.
- 30 4. Encourage compact and mixed use building design.
- 31 5. Foster distinctive, attractive communities with a strong sense of place.
- 32 6. Create walkable and linked neighborhoods.
- 33 7. Create a range of housing opportunities and choices.
- 34 8. Provide a variety of transportation choices.
- 35 9. Encourage community and stakeholder collaboration.
- 36 10. Make development decisions predictable, fair and cost effective

- 1 11. Encourage interconnected development, multi-modal transportation opportunities, links to the
- 2 surrounding neighborhoods, and alternative transportation routes.
- 3 12. Establish priority areas for public facility and service infrastructure.
- 4

CONSISTENCY: THE PROPOSED AMENDMENT FURTHERS POLICY 3.1.2 BY PROVIDING FOR A COMPACT URBAN DEVELOPMENT, ESPECIALLY ADJACENT TO THE WEC AND THE COMMERCIAL CENTERS AT US 27 AND STATE ROAD 40. THE PROJECT WILL THEN TRANSITION TO SINGLE FAMILY AND THEN TO EQUESTRIAN ESTATE LOTS OR RURAL LOTS. THIS TRANSITION WILL HELP PROTECT THE FARMLAND PRESERVATION BOUNDARY BY PLACING LESS INTENSE USES ALONG THE EDGE OF THE DEVELOPMENT.

5
6 **Policy 3.1.3: Modification of UGB**

7 The County finds that the development rights assigned within this Plan and the development forms allowed
8 by this Plan provide adequate development opportunities within and outside the UGB. To modify the UGB
9 the following standards must be affirmatively met:

- 10
11 1. **Market Demand:** An analysis of the requested expansion or reduction of the UGB shall be
12 provided to show why a change in development form is required to accommodate the population,
13 housing or employment needs of the County projected over the planning horizon of this Plan or
14 adjustments that may be needed due to market conditions.
- 15
16 2. **Contiguity to Existing Urban Development Patterns:** It must be demonstrated that the expansion
17 area is contiguous to existing urban patterns of development.
- 18
19 3. **Availability of Urban Infrastructure:** A projection of requirements for public facilities and services
20 must be completed and the ability to provide those facilities and services to serve the proposed
21 development through private or public means shall be demonstrated.
- 22
23 4. **Compatibility:** An evaluation of existing land uses and environmentally sensitive areas within the
24 expansion area must be completed. Appropriate policies shall be written and adopted into this
25 Plan to provide appropriate protections for the transition of land uses adjacent to rural
26 development, to provide for non-interference with agricultural or conservation activities, and to
27 provide for protection of environmentally sensitive lands.
- 28
29 5. **Urban Sprawl:** It must be demonstrated that the expansion area and development within it will
30 discourage urban sprawl.
- 31
32 6. **Water Supply:** It must be demonstrated that there is available water supply for the proposed
33 expansion area.
- 34

CONSISTENCY: THE PROPOSED AMENDMENT IS SUPPORTED BY AN ANALYSIS THAT DEMONSTRATES THE NEED FOR THE EXPANSION OF THE URBAN GROWTH BOUNDARY BY ADDRESSING THE FOLLOWING:

1. **DEMAND – THE AMENDMENT IS SUPPORTED BY A NEEDS ANALYSIS. FOR RESIDENTIAL THE GOLDEN OCALA PLAN WILL TAKE UNITS ALREADY APPROVED ON THE COUNTY’S FLUM AND APPLY THOSE TO THE NEWLY ADDED LANDS. THESE ADDITIONAL LANDS WILL PROVIDE FOR EQUESTRIAN ESTATE LOTS WHICH IS CENTRAL TO THE GOLDEN OCALA MARKET. GOLDEN OCALA HAS 10,000 SEAT WEC UNDER CONSTRUCTION TODAY. THIS AMENDMENT CREATES THREE MIXED USE/COMMERCIAL CENTERS AT THE NORTHERN AND SOUTHERN BOUNDARIES AND DIRECTLY ADJACENT TO THE WEC. THE FACILITY WILL ALSO BE CONNECTED BY TRAILS TO THE HOUSING IN GOLDEN OCALA THEREBY CREATING AN INTERNALLY CONNECTED COMMUNITY.**
2. **CONTIGUITY – THE URBAN GROWTH BOUNDARY EXPANSION APPLIES TO 5% OF THE AMENDMENT AREA. THE EXPANSION IS FOR 118 ACRES THAT ARE LOCATED ADJACENT THE CURRENT URBAN GROWTH BOUNDARY. THESE LANDS ARE DIRECTLY ADJACENT TO PROPERTIES DESIGNATED LOW AND MEDIUM RESIDENTIAL. FINALLY, THESE LANDS ARE PART OF A MUCH LARGER GOLDEN OCALA MASTER PLAN FOR THIS AREA.**
3. **COMPATIBILITY – THE DEVELOPMENT WILL MAINTAIN COMPATIBILITY BY PLACING THE MORE INTENSE URBAN USES ALONG US 27, STATE ROAD 40 AND NW 80TH IN A COMMERCIAL NODE PATTERN AND TRANSITION TOWARD LESS DENSITY ON THE OUTER EDGE TO REDUCE PRESSURE TO INTENSIFY DEVELOPMENT IN THE FARMLAND PRESERVATION AREA. THESE LANDS ARE ALREADY ADJACENT TO URBAN LANDS.**
4. **URBAN SPRAWL – THE PROPOSED AMENDMENT IS SUPPORTED BY AN URBAN SPRAWL ANALYSIS DEMONSTRATING THAT THE AMENDMENT IS NOT CONSIDERED URBAN SPRAWL.**
5. **WATER SUPPLY – THE PLAN AMENDMENT DEMONSTRATES THAT THE AMENDMENT CREATES LESS IMPACTS AND WATER SUPPLY THAN WHAT IS CURRENTLY ALLOWED BY THE FLUM. GOLDEN OCALA IS CURRENTLY WORKING WITH MARION COUNTY TO ENSURE ADEQUATE WATER CAPACITY WILL BE AVAILABLE AT THE TIME OF DEVELOPMENT.**

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Policy 3.1.4: Rural Area Outside of UGB

The lands outside of the UGB shall generally be referred to as the Rural Area and development in this area shall be guided by the following principles and as further defined in the LDC:

1. Protect the existing rural and equestrian character of the area and acknowledge that a certain portion of the County's population will desire to live in a rural setting.
2. Promote and foster the continued operation of agricultural activities, farms, and other related uses that generate employment opportunities in the Rural Area.
3. Establish a framework for appropriate future opportunities and development options including standards that address the timing of future development.
4. Create a focused strategy for the regulation of mining and resource extraction activity.
5. Allow for new Rural Land and Rural Activity Center Future Land Use designations with a Comprehensive Plan Amendment (CPA), as further allowed in this Plan and as further defined in the LDC.

CONSISTENCY: THE PROPOSED AMENDMENT FURTHERS POLICY 3.1.4 BY PLACING THE INTENSE PORTIONS OF GOLDEN OCALA FURTHEST FROM THE RURAL AREA AND TRANSITIONING TO A MUCH LOWER DENSITY ON THE EDGE OF THE PROJECT NEXT TO THE RURAL AREA. ADDITIONALLY, SOME OF THE LOTS ARE PLANNED AS EQUESTRIAN ESTATE LOTS AND AGRICULTURAL LOTS. THIS EQUESTRIAN COMMUNITY AND THE EQUESTRIAN FACILITY HELPS PRESERVE THE COUNTY'S VISION TO PROTECT THE HORSE FARMS OF THE COUNTY.

1
2 **OBJECTIVE 3.3: FARMLAND PRESERVATION AREA**

3 The Farmland Preservation Area is intended to encourage preservation of agriculture as a viable
4 use of lands and an asset of Marion County's economy and to protect the rural character of the
5 area. Planning principles within this area are designed to protect significant natural resources,
6 including prime farmland and locally important soils as defined by the United States Department
7 of Agriculture and unique karst geology that provides high recharge to the Floridan Aquifer, a key
8 source of freshwater for central Florida. The County establishes this area as critical to the
9 enhancement and preservation of its designation as the Horse Capital of the World.

10
11 **Policy 3.3.1: Elements of Rural Character**

12 The County shall preserve and protect rural and equestrian/agricultural character within the Rural Lands,
13 specifically the Farmland Preservation Area, by requiring that all appropriate future development activities
14 within this Area preserve, support, and enhance the fundamental elements of rural character:

- 15 1. *Scenic Views:* The viewshed of arterial and collector roadways in the Rural Area shall be protected from
16 land clearing and other visual intrusions associated with development; such protections, however, shall
17 not restrict the fundamental agricultural uses permitted within this Area.
- 18 2. *Open Space Protection:* Residential development options shall include incentives to promote the
19 protection of open spaces.
- 20 3. *Rural Lighting:* In order to preserve the rural character of the area, artificial illuminating devices,
21 emission of undesirable rays into the night sky, glare to oncoming traffic and intrusion of light onto
22 adjacent properties shall be prevented to the greatest extent possible, as further defined in the LDC.
- 23 4. *Transportation:* Roadway design within the Rural Area shall be consistent with the principles of context
24 sensitive design, which considers the relationship of land uses and all aspects of roadway design,
25 including speed, travel lane width, access management, and landscaping. New transportation corridors
26 intended to be used specifically for the construction of expressways or limited access roadways shall
27 avoid the Farmland Preservation Area unless the Department of Transportation can demonstrate that
28 there are no feasible corridor alignments outside of the Farmland Preservation Area, in which case the
29 Department shall design and develop such roadway in such a way as to minimize and mitigate negative
30 impacts to vital farmlands, key environmental areas, and valuable open space, including, but not limited
31 to, provision of adequate screening and buffers between the roadway and such sensitive areas. The
32 development of any such corridor shall be closely coordinated with the Board of County Commissioners
33 and County Staff.
- 34 5. *Infrastructure:* Other infrastructure including water and sewer utilities and stormwater facilities within
35 the Rural Area shall reflect a rural level of service and shall not be modified to the point that it
36 encourages or allows for urban development.
- 37

CONSISTENCY: THE PROPOSED AMENDMENT IS CONSISTENT WITH PROTECTION OF THE FARMLAND PRESERVATION BOUNDARY BY PLACING THE INTENSE PORTIONS OF GOLDEN OCALA FURTHEST FROM THE RURAL AREA AND TRANSITIONING TO MUCH LOWER DENSITIES ON THE EDGE OF THE PROJECT NEXT TO THE RURAL AREA. ADDITIONALLY, SOME OF THE LOTS ARE PLANNED AS EQUESTRIAN ESTATE LOTS. FINALLY, PORTIONS OF THE PROJECT ARE LOCATED IN THE RURAL LAND USE; THIS PORTION WILL DEVELOP CONSISTENT WITH THE RURAL CATEGORY EITHER AS AN EQUESTRIAN RECREATION USE OR AT VERY LOW RURAL DENSITIES (1 DU/10 ACRES). THIS EQUESTRIAN COMMUNITY AND THE EQUESTRIAN FACILITY HELPS PRESERVE THE COUNTY'S VISION TO PROTECT THE HORSE FARMS OF THE COUNTY.

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Policy: 3.3.3 Standards for Amending the Farmland Preservation Area

Any Comprehensive Plan amendment that would increase development intensity or density within the FPA, or that would remove one or more parcels from the FPA, shall be required to be accompanied by a concurrent Comprehensive Plan amendment to extend the Urban Growth Boundary, or create a new Urban Growth Boundary, to include the parcel(s) under consideration. Comprehensive Plan amendments to expand existing Rural Activity Centers are exempted from this requirement if the Rural Activity Center and the proposed amendment comply with the size, density, and other requirements set forth in Policy 2.1.19.

CONSISTENCY: THE PROPOSED AMENDMENT IS SUPPORTED BY AN ANALYSIS THAT DEMONSTRATES CONSISTENCY WITH FLUE POLICY 3.3.3. THE AMENDMENT DEMONSTRATES CONSISTENCY WITH THE COUNTY'S REQUIREMENTS FOR EXPANDING THE URBAN GROWTH BOUNDARY AND PROVIDES THE ANALYSIS REQUIRED TO SUPPORT A COMPREHENSIVE PLAN AMENDMENT.

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GOAL 4: IMPLEMENTATION OF THE COMPREHENSIVE PLAN

To enable the public to know and understand how the County will implement the goals, objectives, and policies of the Comprehensive Plan.

OBJECTIVE 4.1: ADMINISTRATION OF THE COMPREHENSIVE PLAN

The County shall administer and interpret the Comprehensive Plan, Zoning, and LDC and resolve issues that may arise during the development review process in a cost effective, efficient, and timely manner in order to reduce barriers that may unnecessarily discourage economic development activities.

Policy 4.1.1: Consistency between Comprehensive Plan, Zoning, and LDC

The County shall amend and maintain an official land use and zoning map, appropriate land use designations and zoning classifications, and supporting LDC that shall be consistent with each other.

Policy 4.1.2: Conflicts between Comprehensive Plan, Zoning, and LDC

The Comprehensive Plan shall be the governing document. In the event of conflict between the Comprehensive Plan, Zoning, and LDC, the more stringent regulation shall apply, unless the County has

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DOAH Case No.

v.

Marion County, Florida,

Respondent.

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EXHIBIT "G"

TO

PETITION FOR FORMAL ADMINISTRATIVE HEARING

EXHIBIT E
URBAN SPRAWL ANALYSIS

Urban Sprawl Analysis

Urban sprawl has been recognized as a very expensive and undesirable trend in unmanaged growth. Urban sprawl results in higher initial cost due to the increased amount of infrastructure necessary to serve dispersed low-density development (longer runs of pipe and pavement to serve an equal number of dwelling units). Sprawl also increases day to day operating costs that go on year after year (maintenance on the greater amount of required infrastructure, increased travel time and fuel, etc.). Sprawl also tends to be wasteful of resources by consuming inappropriate amounts of land thus forcing future development into less appropriate areas for development.

The elimination of urban sprawl in new land development is a central theme in both Chapter 163 and the County's Comprehensive Plan.

The state planning laws also support innovative and flexible planning techniques including new towns in order to create a more efficient pattern of development. The statute requires when these techniques are used you must demonstrate protection of environmentally sensitive areas, maintaining economic viability of agricultural and other rural land uses and provide for cost-efficient delivery of public facilities and services. When these factors are present then approaches such as new towns are considered a method to discourage urban sprawl.

A. CONSISTENCY WITH CHAPTER 163, FLORIDA STATUTES – URBAN SPRAWL INDICATORS

Chapter 163.3177(6)(a)9., F.S., presents 13 primary urban sprawl indicators against which the proposed amendment must be evaluated. A “no” answer to each of the following questions indicates that a proposed development does not promote urban sprawl. A yes answer requires further evaluation to determine the extent, amount or frequency of that indicator.

1. Does the proposed amendment promote the development of low-intensity, low-density, or single use development?

No, the Project does not promote low-intensity and low-density development. As described in the summary of the project, Golden Ocala includes a mixture of uses anchored by the World Equestrian Facility including commercial, equestrian recreation, and a range of housing types including equestrian estates, traditional single-family and multi-family units.

The proposed amendment improves the mixed use potential/capacity of Golden Ocala. It does this by increasing the commercial and hotel entitlements and RV units providing a better mix for the existing residential units and the anticipated impact of the World Equestrian Center as a destination for the County. Golden Ocala also includes a wide range of housing types from condo and multi-family units, single family residential to unique equestrian style lots which is fitting for a project containing the World Equestrian Center facility. Further, the proposed amendment creates a new land use category – World Equestrian Center – which is itself a

mixed-use category designed to provide a mix of uses in proximity to the World Equestrian Center itself.

2. Does the proposed amendment designate significant amounts of urban development in rural areas at substantial distances from existing urban areas while leaping over undeveloped lands which are available and suitable for development?

No, Golden Ocala is an approved urban area and has been for many years. The residential construction has not been rapid, but the development has been approved through its vested DRI, PUDs, special use permits and future land use approvals for many years. Additionally, the majority of the expansion area has already been approved for intense development for many years. Significant infrastructure investments have been made by both the developer and Marion County in and around Golden Ocala to serve this urban area.

The proposed amendment increases retail square footage, hotel rooms, event seating and RV units while also significantly decreasing residential dwellings units already approved on the FLUM. Thus, the decrease in residential units partially off-sets any increase in impacts on transportation, water, sewer etc. All of the urban development is focused on the urban core of Golden Ocala and away from the rural edge of the Project and the County.

The more rural edge of the Project contains rural development, Equestrian Estate Lots built at a density of 1 unit per 3 acres, equestrian recreation uses and some low density residential development. There is no increase in residential units created by this amendment. The amendment expands the residential entitlements already approved for Golden Ocala and retires the dwellings on some of the expansion parcels. Thus, the amendment results in no increase in residential units.

The amendment does propose an expansion of the County's Urban Growth Boundary on 118 acres. This proposed expansion is approximately 5% of the Project boundary. Those lands are currently designated Rural on the FLUM but are directly adjacent to lands within the UGB with no leapfrogging of properties. The 118 acres and adjacent properties are planned for low residential and/or Equestrian Estate Lots. This pattern creates a logical extension of the existing Golden Ocala project. As amended, the Project will actually create a transition boundary from the commercial core of the development to lower density Equestrian Estate housing suitable for equestrian living. These Equestrian Estate homes will provide a transition to the County's Farmland Preservation Area Boundary and Rural designated lands.

3. Does the proposed amendment promote urban development in radial, strip, isolated or ribbon patterns generally emanating from existing urban development?

No, the amendment does not promote urban development in an inefficient pattern such as radial, strip or ribbon patterns. The Project revises the Golden Ocala project to reduce residential units on the FLUM but increase commercial and hotel units centered around the World Equestrian Center and in key locations along US 27 and State Road 40, key entrances into Golden Ocala and the World Equestrian Center.

Furthermore, Golden Ocala is an approved urban area and has been for many years. The proposed amendment directs all new non-residential development into the urban area of the Project boundary – areas that have been approved for urban development for some time now.

The development pattern created by the Project is not a sprawling development but rather a logical extension with high density/intensity at its core and lower densities and intensities with equestrian estates, rural densities and equestrian recreation uses on the edge creating a compatible buffer to the Farmland Preservation Boundary. The significant decrease in residential units further supports this lack on intense development on the project edges.

4. Does the proposed amendment fail to protect and conserve natural resources such as wetlands, floodplains, native vegetation, environmentally sensitive areas, natural groundwater aquifer recharge areas, lakes, rivers and other significant natural systems.

No. The subject property is very suitable for development as demonstrated in the environmental analysis conducted by Modica & Associates. The report identified very few wetlands and listed species on site. Any environmentally sensitive areas are on the edge of the Project where rural development, equestrian recreation uses and lower density development is proposed. During site planning and environmental permitting the property will be analyzed in more detail which allows for site planning to work around environmental features.

5. Does the proposed amendment fail to protect adjacent agricultural areas and activities including unique and prime farmland and soils?

No. There are no agricultural areas or activities which are adjacent or would be adversely impacted by the amendment. The property also does not contain any unique and prime farmland or soils. Adjacent to the amendment boundary to the north and west is the County's Farmland Preservation Boundary. The Project's core development is not adjacent to this Boundary; rather, it is adjacent to the World Equestrian Center and along US 27 and State Road 40 at the main entrances of the Project.

Residential densities are stepped back toward the edge of the Project in keeping with the Farmland Preservation boundary. The land uses along the edge of the Project include rural development, equestrian recreation, Equestrian Estate Lots at a density of 1 unit per 3 acres and some low density residential. In addition to lowering densities on the edge, the amendment removes over 1,800 residential units already approved on the FLUM and extends Golden Ocala's already approved units onto those properties.

The County's development controls further protect the edge of this Project from impacting the larger Farmland Preservation Boundary. Additional comprehensive plan amendments and the required supporting analysis must be provided in order to further extend into the Farmland Preservation Area. The Golden Ocala and the World Equestrian Center provide a unique project in Marion County providing for stepped down Equestrian Estate Lots and equestrian recreation uses connected by trails to more intense urban areas in close proximity but far enough away to protect the agricultural edge. The World Equestrian Center fits Marion County's vision as an equestrian community and its branding and supports the County's economic vision.

Finally, the Equestrian Estate Lots are planned for stormwater purposes as one acre landscaped and two acres natural which will serve to protect any natural features on that portion of the Project. This would also help protect off-site features as well.

6. Does the proposed amendment fail to maximize the use of existing public facilities and services?

No. The Project is within the water and sewer service area of the County, and public facilities are currently available to the site. The land is a logical extension of the County's services since the County already services the surrounding area. Golden Ocala constructed services as part of the Project along with investments from the County helping make the area suitable for urban development. Golden Ocala has been approved for many years and in 2017 received comprehensive plan approval for the World Equestrian Center development. To date central water and sewer are constructed, schools are available to the site and a fire stations is contiguous to the Project.

The proposed amendment adds new non-residential development limited to the urban portion of Golden Ocala and on new lands that have already been planned/approved for urban development on the County's FLUM. The Project also adds residential lands but actually reduces the development intensity by approximately 1,880 units. Lower residential densities are planned on the edge. The developer has the option to build up to 300 Equestrian Estate Lots at a density of 1 unit per 3 acres. All of those units will be on the edge of the Project adjacent the Farmland Preservation

Boundary. Another 160 acres are planned to remain to develop consistent with the County's rural requirements at 1 unit per 10 acres.

The revised master plan results in an improved mix of land uses to serve the World Equestrian Center, the planned northern and southern urban centers for the Project and the larger areas surrounding Golden Ocala to the north and east. This master plan will help tie together lands that were already planned for urban development by the County prior to this amendment.

7. Does the proposed amendment fail to maximize the use of future public facilities and services?

No, for the reasons mentioned above, the Project is in an area that is planned for urban development both now and into the future. The amendment further reinforces the development of this area where public facilities have already been constructed. The land is a logical extension of the County's services since the County already services the surrounding area.

8. Does the proposed amendment allow for land use patterns or timing which disproportionately increase the cost in time, money and energy, of providing and maintaining facilities and services, including roads, potable water, sanitary sewer, stormwater management, law enforcement, education, health care, fire and emergency response, and general government?

No. Golden Ocala and most of the proposed expansion area has been an approved urban area on the FLUM for years. This amendment ties these areas together in a cohesive master plan. Furthermore, urban facilities have already been constructed to serve this area including water, sewer, roads, fire stations and schools. Expanding Golden Ocala is an efficient use of public facilities.

New residential areas are proposed with higher densities located adjacent to the mixed use cores integrating commercial centers with the higher residential areas. Residential densities are reduced as you move further from the urban core until you have rural and Equestrian Estate Lots on the Project's edge. Thus the edge will provide a planned transition into the larger Farmland Preservation Boundary. All of this is occurring while the plan results in an elimination of 1,880 units from the FLUM.

9. Does the proposed amendment fail to encourage development which would, by its location, provide a clear separation between rural and urban uses?

No, the proposed amendment is a logical expansion of the County and Golden Ocala and provides a transition from the more intense portions of

Golden Ocala to the Farmland Preservation Area Boundary. The amendment creates this transition as follows:

- 160 acres on the edge of the Project will remain Rural. The Project will have the WEC designation and once developed will either be dedicated to equestrian recreation use or have the rural density of 1 unit per 10 acres if residential.
- 300 Equestrian Estate Lots are proposed at the edge of Golden Ocala at 1 unit per 3 acres. These lots provide a transition to the Low Residential and then higher density portions of Golden Ocala.
- The amendment results in the elimination of approximately 1,880 units from the FLUM. Golden Ocala's approved residential units are being extended to the expansion parcels while eliminating the residential densities currently assigned to those parcels.
- Finally, the proposed World Equestrian Center supports the County's equestrian community and its future growth. Golden Ocala is a unique project blending the economic growth with the protection of existing farms.

10. Does the proposed amendment discourage or inhibit infill development or the redevelopment of existing neighborhoods and communities?

No. The proposed project will not inhibit or discourage infill development. Golden Ocala is not a new project. It has been approved for many years through its vested DRI and PUD approvals and in 2017 the latest comprehensive plan amendment approvals which included the World Equestrian Center. This latest amendment actually reduces approximately 1,880 units from the FLUM while increasing non-residential square footage (hotel and commercial) adjacent the World Equestrian Center and the northern and southern mixed use centers creating a new regional attractor for Marion County. Since there is no increase in residential units, this Project is not taking units from other developments in the County. By eliminating residential units and developing additional non-residential this Project should result in the growth of the County's economic base benefiting surrounding properties and larger Marion County.

11. Does the proposed amendment fail to encourage an attractive and functional mix of uses?

No. The amendment significantly improves the FLUM by creating a new mixed-use FLU category (World Equestrian Center) and by providing a mixed use master plan for these lands that have long been approved for urban development. Golden Ocala and the larger surrounding properties have long been approved for urban development as reflected in the existing land use analysis supporting this amendment. The Golden Ocala

amendment creates new urban centers that are supported by higher density residential, hotels and RV units adjacent these core areas. This results in a clear master plan replacing a combination of urban designated lands with no focus. The Golden Ocala amendment ties these areas together as follows:

1. Northern Commercial Center (Areas¹ 2, 3 and 4) - Golden Ocala and separate properties have been approved for Commercial, Urban Residential and Medium Residential at US 27 and NW 80th Avenue for many years. This amendment links these areas together with a mixed use development integrated with higher density residential on both the north and south sides of US 27.
2. Southern Mixed Use Center (Area 6) - As part of the 2017 amendment Golden Ocala agreed to build a major entrance to the south to relieve traffic from NW 70th Avenue. The benefit of this change is an opportunity to create a mixed use entrance at State Road 40.
3. World Equestrian Center/Central Mixed Use Center (Area 7) - The 2017 amendment was already approved with a commercial node adjacent to the WEC and RV units along NW 80th Avenue. This mixed use area adjacent the WEC will provide a focal point for that area.
4. The edge of Golden Ocala (Areas 1, 5 and 8) includes rural development, equestrian recreation and Equestrian Estate Lots providing a natural transition to the Farmland Preservation Boundary to the west and north of the Golden Ocala project.

12. Does the proposed amendment result in poor accessibility among linked or related land uses?

No. The Project will include internal connections between uses providing a high level of accessibility. Internal connectivity will be addressed at the time of local development approval.

13. Does the proposed amendment encourage development which would result in the loss of significant amounts of open space?

No. The supporting land use analysis identifies that this amendment includes 2,306 total acres. Out of that total, 1,707 acres (74%) have already been approved for urban development before this amendment was even proposed. Another 321 acres are proposed to be redesignated from rural to urban land uses but all of these lands are already within the County's UGB and thus were planned to be developed as urban in the future. The

¹ The Areas referred to herein are defined and depicted in the support material to which this Exhibit is attached.

environmental report from Modica & Associates clearly demonstrates that these lands are very suitable for urban development. Another 160 acres that will remain outside of the County's UGB are planned to develop consistent with the County's rural requirements; those lands are planned for equestrian recreation uses or may develop as large lot residential at a density of 1 unit per 10 acres. That leaves 118 acres (5% of this amendment boundary) as lands transitioning from rural to urban uses that are currently outside of the UGB. Other sections of this amendment support document addresses why this change is consistent with the County's plan.

Golden Ocala's master plan protects open space internally and the adjacent Farmland Preservation Boundary in the following ways:

1. The project uses the best tool to protect rural lands which is to establish clear urban areas and a step down in density and intensity to the edge of the Project.
2. The master plan places rural development, Equestrian Estate Lots, equestrian recreation and low density residential on the edge of the Project. Because the Project is dedicated to the equestrian community emphasis is placed on larger lots to encourage an equestrian lifestyle but with some urban amenities.
3. Rural development is planned on lands to the west of Golden Ocala that would develop as equestrian recreation or large lot residential at 1 unit per 10 acres consistent with the County's rural requirements and further create a transition to the Farmland Preservation Boundary to the north and west of Golden Ocala.
4. The Project also adds residential property to the Project but does not add any of the residential density already dedicated to those parcels. Thus, the Project actually reduces residential density on the Marion County FLUM by 1,880 units.
5. According to the Project's stormwater planning, 2/3 of the rural/Equestrian Estate Lots are planned as non-landscaped areas. These lands are planned as part of the equestrian/horse farm lands of the Project. Thus, it is assumed that approximately 630 acres of the Equestrian Estate Lots are non-landscaped areas which may serve as open space, conservation or other features. This leaves 1/3 or 315 acres as planned landscaped areas. This further protects open spaces in the Project.

Result of Urban Sprawl Analysis: The proposed amendment triggered none of the 13 indicators for urban sprawl.

B. CONSISTENCY WITH CHAPTER 163, FLORIDA STATUTES – DEVELOPMENT PATTERNS

Chapter 163.3177(6)(a)9.b., F.S., presents 8 development patterns or urban forms. If 4 or more of the development patterns or urban forms are achieved then the it shall be determined that the amendment discourages the proliferation of urban sprawl. A “yes” answer to each of the questions indicates that a proposed development does not promote urban sprawl.

1. Directs or locates economic growth and associated land development to geographic areas or the community in a manner that does not have an adverse impact on and protects natural resources and ecosystems.

Yes. Golden Ocala and the World Equestrian Center is planned as a regional attractor but this growth is not at the expense of the County’s rural lands. With the foundation of the Project being the County’s equestrian community, the rural edge is protected by directing the intense development to the core of the Project far away from the Farmland Preservation Boundary.

The majority of the Project expansion (74% of amendment) is on lands that have already been approved for intense urban development by Marion County. This includes lands designated as Commercial, Urban Residential, Medium Residential and Low Residential. These lands have been determined by the County to be suitable for urban development.

All of the Project, except for some of the Equestrian Estate Lots and planned rural areas, will connect to central water and sewer which will help protect the springshed.

The environmental analysis conducted by Modica & Associates demonstrates that the amendment boundary is a very suitable location for urban development. There are very few wetlands on site and few listed species that require protection. Project site planning will also help protect open spaces and environmental resources on site.

The edge of the Project is dedicated to rural development, equestrian recreation, Equestrian Estate Lots and low density residential. Development at the edges will be at lower densities to provide the equestrian farm lifestyle that is an important component of the Project. Natural features can be incorporated into the site design to preserve conservation features.

For the lands that are currently designated Rural, they are composed of the following:

- 321 acres are designated Rural but are located within the urban service area and adjacent to Low and Medium Residential and suitable for urban development;
- 160 acres are Rural but are planned for Rural development;

- Only 118 – acres or approximately 5% of the amendment – are currently outside of the UGB and are being added to the Project as Low Residential. These lands are adjacent to the current UGB and suitable for development.
- Finally, while many residential acres are being added to the Project the actual density on the County’s FLUM is shrinking by 1,880 units.

2. Promotes the efficient and cost-effective provision or extension of public infrastructure and services.

Yes. Golden Ocala has been an approved urban development for many years. The developer and the County has made significant improvements and investment to serve this area with urban services including the construction of a sewer treatment plant, fire stations, schools etc. The World Equestrian Center is further proof of the vision to develop an intense urban development where urban infrastructure is in place to serve it. The Project is not only served by central water and sewer but it is also ideally located along US 27 and State Road 40 with direct connections to I-75.

74% the acres in this amendment are already designated with intense urban land uses on the Future Land Use Map. The amendment actually incorporates these parcels into a coherent master plan for this portion of the County.

160 acres on the edge of the Project are outside of the UGB but are planned to develop as equestrian recreation or large lot residential at 1 unit per 10 acres consistent with the County’s rural requirements.

Only 118 acres (5% of the amendment) are dedicated to lands currently Rural and proposed to be included in the UGB. These lands are suitable for urban development and are proposed for Low Residential use. The master plan identifies those lands for equestrian estates, equestrian recreation or low density residential.

3. Promotes walkable and connected communities and provides for compact development and a mix of uses at densities and intensities that will support a range of housing choices and a multi-modal transportation system, including pedestrian, bicycle and transit, if available.

Yes. This plan amendment makes Golden Ocala more mixed-use and provides three centers that can be used to encourage multi-modal connectivity both through-out the Project and locations for future transit connectivity if service is established. This is created through the following:

1. Density – The amendment includes a wide-range of density and housing unit types. This includes housing integrated into the urban

centers at US 27 and adjacent the WEC. Housing may also be integrated into the southern boundary in the future. This mixture of uses will encourage walking between the WEC, commercial uses, hotels and residential all within the Project.

2. The amendment further expands the housing choices and increases residential densities especially where Urban Residential is permitted north of US 27. The Project will range from multi-family and condo units to townhomes, single family, RV units and Equestrian Estate Lots on the edge of the Project.
3. Golden Ocala will be connected internally by both the internal road system and equestrian trails. Since Golden Ocala is a gated community, the speeds can be minimized allowing for golf carts and pedestrians to travel along the side of the roads and still feel safe.
4. The amendment creates a master plan for this portion of Marion County capturing properties that were already approved for urban uses and placing them in a master plan where these lands can be integrated into a mixed use development. The result is a more compact development, especially at and adjacent to the three mixed use nodes.
5. Transit facilities are not currently available west of I-75. This master plan provides for mixed use locations where it is possible that along US 27 and SR 40 at the northern and southern entrances transit facilities may become a possibility in the future.

4. Promotes the conservation of water and energy.

Yes. This plan amendment makes Golden Ocala more mixed-use and provides three commercial nodes that can be used to encourage multi-modal transportation. However, regarding water use and the golf course and equestrian components Golden Ocala uses large amounts of water. Golden Ocala has agreed to work to conserve water as required in FLUE Policy 10.5.1 #7 and is committed to do so in the future.

5. Preserves agricultural areas and activities including silviculture, and dormant unique, and prime farmlands and soils.

Yes. As previously mentioned, this amendment covers 2,306 acres and 1,707 acres are on lands already planned for urban development on the FLUM. Another 160 acres of the Project are located outside of the UGB and are planned to develop as equestrian recreation use or large lot residential consistent with the County's rural requirements. 321 acres of Rural land in the amendment boundary are already located in the UGB and have been planned for urban development. That leaves 118 acres of Rural land that is proposed to be added to the UGB.

Golden Ocala and the World Equestrian Center are dedicated to preserving the equestrian community in Marion County. One way Golden Ocala is

protecting this area by transitioning the Project's residential densities to be compatible to the Farmland Preservation Boundary. This step down in density and intensity allows for the preservation of open spaces on the edge with equestrian recreation, Equestrian Estate Lots and rural development. The amendment also eliminates 1,880 residential units that were already approved by Marion County. Instead the amendment spreads Golden Ocala's existing residential units over the amendment boundary. The amendment also focuses development at the mixed use cores with higher densities adjacent those urban centers.

Finally, the proposed World Equestrian Center supports the County's equestrian community and its future growth. Golden Ocala is a unique project blending the economic growth with the protection of existing farms.

6. Preserves open space and natural lands and provides for public open space and recreation needs.

Yes. This plan amendment preserves open space and natural lands and provides for open space and recreation needs. As mentioned in #5 above, the majority of this amendment is dedicated to lands that have been approved for urban development for many years. Focusing urban development in planned urban areas is the best tool for protecting rural lands.

Since Golden Ocala is anchored by the World Equestrian Center, preserving lands for equestrian uses is a large component of the Project's master plan. The master plan dedicates urban development to the mixed use cores. The urban portion also includes the WEC which is dedicated to equestrian uses and includes open spaces for the equestrian events. Density is then reduced as you move away from the urban centers until you reach the rural edge.

Transitioning to the less dense areas, the Project includes equestrian trails internal to the Project as well as Equestrian Estate Lots at a maximum density of 1 unit per 3 acres. The plan also includes 160 acres of rural area that will develop as equestrian recreation or large lot residential at 1 unit per 10 acres. The stormwater plan for the 300 Equestrian Estate Lots assumes that only 1 acre of each lot will be landscaped. That means the other 2/3 of these Equestrian Estate Lots will be natural area or horse farm use etc. The Project assumes 630 acres as open space or non-landscaped area for these Equestrian Estate Lots.

Finally, the plan amendment includes over 1,000 acres of lands that are being added to Golden Ocala without adding any new residential densities. The plan actually eliminates 1,880 units already approved on the FLUM. This will also further reduce the residential densities on the edge of the Project and provide for more open space on site.

7. Creates a balance of land uses based upon demands of the residential population for the non-residential needs of an area.

Yes. This plan amendment furthers the goals of the Marion County Comprehensive Plan by improving the balance of land uses between residential and non-residential within Golden Ocala. The Marion County Plan does not have an adopted jobs/housing ratio or methodology for determining the jobs/housing mix. An accepted ratio is 1 employee = 400 square feet of commercial. This is a very conservative ratio and can be higher or lower depending upon the specific use or if an office use is included.

Golden Ocala is currently approved for 525,000 SF, the WEC and 385 hotel rooms. It is also unclear at this point how many jobs will be generated by the WEC. For the commercial component alone, using the ratio above 1,312 employees would be generated under the current approvals.

Golden Ocala is currently approved for 2,399 units. Marion County's average housing is 2.64 persons per household. Based upon the current approvals for the Project, it is assumed that Golden Ocala would have 6,333 residents. Marion County also has 46% of its population in the workforce. Applying this assumption you would have 2,913 employees in Golden Ocala that would be in the Marion County workforce. Comparing the total employees generated by the approved commercial development with the projected employees from Golden Ocala you have less than 1 job available for every 2 residents in the Marion County workforce.

The proposed amendment increases the maximum commercial development to 3.4 million square feet but a large portion was already approved on the Marion County comprehensive plan. If you used only the net increase, this amendment adds 1,121,889 square feet to the Marion County Plan. Using the same assumptions for employee generation, the 1.1 million square feet would generate 2,804 additional employees.

Once again, comparing the Golden Ocala residents to the assumed jobs generated there would be more jobs generated than residents at Golden Ocala. Thus, the amendment would be assumed to provide a job for every resident at Golden Ocala and would also provide a needed surplus of jobs for this portion of the County.

A quick glance at the County's FLUM identifies that there is little commercial development approved adjacent Golden Ocala but a significant amount of lands designated for Medium and Low Residential. The closest commercial areas are along I-75 and the new industrial park. This amendment creates a new commercial core for the County with Golden Ocala and the WEC as an employment generator for Marion County, a generator that reinforces the County's brand as the "Horse Capital of the World".

8. Promotes uses, densities, and intensities of use and urban form that would remediate an existing or planned development pattern in the

vicinity that constitutes sprawl or if it provides for an innovative development such as transit oriented development or new towns as defined in Section 163.3164, F.S.

No. This plan amendment does not meet this criteria. First, the amendment is not remediating an existing sprawl condition. The Project is in an area that has been planned for many years for urban development. The WEC is the catalyst for that planned development. The majority of lands included in this amendment that are being added have also been planned for urban development for many years by the County. Second, Golden Ocala is not a new town. It is part of the planned urban area in Marion County. However, it is a mixed use development and will have the commercial capacity to provide for many of the daily needs of its residents including employment which could help minimize trip lengths and provide more opportunities for a walkable development and self-sufficient community.