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**Vanessa J. Leroy | Director**  
City of Hallandale Beach  
Department of Sustainable Development (DSD)  
400 South Federal Highway  
Hallandale Beach, FL 33009

**RE: Gulfstream Park Racing Association, Inc. ("GSP") – Application for a text amendment to the Planned Local Activity Center District ("PLAC District"), by specifically amending Subsection 32-171 (d)(1), Code of Ordinances, to include casinos, pari-mutuel wagering, slot machine gaming and cardroom facilities as permitted uses within the PLAC District**

Dear Ms. Leroy,

On behalf of our client, GSP, please accept this letter as a formal request for the above-referenced proposed zoning text amendment, in order to afford GSP the flexibility, in the future, to include such uses within its development/redevelopment plans for The Village at Gulfstream Park ("VGP"). The Application, together with the proposed amendment language and the checks for the appropriate filing and advertising fees accompany this letter.

As you are aware, VGP is a mixed-use development comprised of approximately sixty (60) acres designated as Parcel "A" of the Gulfstream Park Plat, recorded in Plat Book 182, Page 195, Official Records of Broward County, Florida. VGP was the subject of a DRI Development Order adopted in November, 2006 (Ordinance No. 2006-24), and subsequently amended in 2014 (Ordinance No. 2014-26), has a land use designation of Local Activity Center ("LAC") and is zoned Planned Local Activity Center ("PLAC").

The PLAC District is codified as Section 32-171 (d)(1), City Code of Ordinances. The current PLAC language provides, in pertinent part, that "...[s]lot gaming facilities and casinos are prohibited." Thus, this request proposes to amend Subsection 32-171(d)(1). by eliminating that prohibitory language, and adds "...casinos, including pari-mutuel wagering, slot machine gaming and cardroom facilities...", as specifically permitted uses. The proposed amendment also deletes language that has never been implemented, authorizing pari-mutuel wagering machines within certain facilities under limited circumstances. Please see the proposed amendatory provision included with this Application package.

By way of background, GSP, and its predecessor ownership entities, have been engaged in the operations of the pari-mutuel thoroughbred racing facility for approximately seventy-five (75) years. Although the pari-mutuel licenses from the State encompass the entirety of GSP's Hallandale Beach property, the actual pari-mutuel uses have not yet operated within the area now subject to the PLAC regulations.

In March, 2005, the voters of Broward County approved a referendum authorizing slot machines at existing licensed pari-mutuel facilities in Broward County, and GSP was the beneficiary of that decision. Although there was initial consideration of possible pari-mutuel wagering within VGP, as approved, the PLAC "permitted use" regulations precluded such activities within its boundaries, and the slot machine facility was placed within the existing Clubhouse by renovating certain space on both the ground floor and the second floor.

Phase I of VGP was developed and occupied in 2007-08 as a joint-venture between GSP and Forest City Enterprises. Subsequent phases of development occurred over the next several years, although GSP bought-out Forest City's interests in approximately 2012. GSP now owns and controls the entire property located in Hallandale Beach, and continues to assess its future development alternatives.

In summary, in order to maximize the potential branding or re-branding of the VGP image, GSP is constantly evaluating the business opportunities for its overall property. VGP has not had any significant new development occur over the past several years, but GSP is excited about sharing its future plans with the City as the process continues to percolate. Since the pari-mutuel licenses include the VGP parcel within the boundaries of the permitted area, the ability to expand into VGP is limited only by the existing prohibition in the PLAC regulations. By approving this request, the City will be enabling the Applicant to consider expanding pari-mutuel uses into VGP and/or other undeveloped parcels outside the existing Clubhouse. Such flexibility in planning will provide the potential for the ultimate enhancement of the customer/visitor experience, and should result in an economic boon to the City at-large.

We appreciate your continued cooperation, and look forward to discussing this request with you and your Staff and appearing before both the Planning & Zoning Board and the City Commission.

Sincerely,

Shutts & Bowen LLP

Edwin J. Stacker

EJS/dlo