

MEMORANDUM

To: Marion County Board of County Commissioners

From: Evangeline Linkous, PhD, AICP * Linkous Consulting LLC

Date: February 13, 2026

Subject: Rezoning of Parcel 02781-000-00; Case 260207ZP

I. Summary

I have been retained by Horse Farms Forever to evaluate the application for rezoning of parcel 02781-000-00 (Case 260207ZP) to determine compliance with applicable codes and the County's Comprehensive Plan goals, objectives, and policies. As the Board is aware, the mission of Horse Farms Forever, a not-for-profit corporation, is to inspire the conservation of horse farms by preserving the pastureland, soil, and water on which horse farms depend while minimizing land use conflicts in Marion County.

As indicated in the Staff Report, Case 260207ZP is a Rezoning for PUD Modification:

- **FROM:** Planned Unit Development (PUD) – RV Park with private amenities
- **TO:** Planned Unit Development (PUD) – RV Park with public amenities

A point of clarification here:

- On the Application for the Case, the Applicant indicates that the “application is provided for the purpose of making two text amendments.” However, this framing does not accurately or completely describe the decision involved in this Case. It is recommended that the Board refer to the “Rezoning for PUD Modification” language indicated in the Staff Report.

The Board must determine whether changes to the PUD to accommodate public amenities should be approved. In doing so, the Board must consider:

- Provisions of Marion's LDC Section 4.2.31 on PUD and approved PUD; *and*
- Three criteria for a rezoning: 1) Consistency with the Comprehensive Plan; 2) Compatibility with the land uses of surrounding properties; and 3) No adverse impact on the public interest.

The decision before the Board centers around the change to public amenities. **The Staff Report indicates, “The PUD proposes text changes that will enable non-RV user day-use operations of the RV Park amenities (themed recreation area – pool, bar/restaurant, play facilities, etc.) at the determination of the developer/operator.”**

My detailed analysis follows hereto and we are requesting that this be incorporated into the record of the forthcoming public hearing scheduled for February 17, 2026. As a result of my review of the petitioner’s application and staff findings and set forth in this memo, I recommend the following action:

Enter into the record the Staff Report and all other competent and substantial evidence presented at the hearing, adopt the findings and conclusions contained herein, and DENY the rezoning amendment.

This recommendation is based on the following findings as documented herein:

- The PUD for Parcel 02781-0000-00 was approved for Permitted Uses associated with the Recreational Resort zoning designation, as evidenced by 1) the reference to the Recreational Resort zoning classification; and 2) listed uses, which all align with Permitted Uses allowed in the Recreational Resort zoning classification.
- The identified intent and character, including amenities, of the approved PUD is Recreational Resort. The approved PUD does not include public amenities and, to the degree that amenities are identified, these are private and small-scale and align with Recreational Resort.
- The Development Review Committee (DRC) approved Site Plans that include changes that are specified for review and approval before the Board per LDC Section 4.2.31.K(2), raising issues of application of correct law and legal delegation of authority. The changes include changes to PUD amenities including size and location, which are central to PUD intent and character. These changed amenities were introduced through the site planning process which may continue until a final plan is submitted—and thus additional amenities may be introduced on the site.

- The Staff Report indicates, “The PUD proposes text changes that will enable non-RV user day-use operations of the RV Park amenities (themed recreation area – pool, bar/restaurant, play facilities, etc.) at the determination of the developer/operator.” These identified amenities (a themed water park with bar and restaurant facilities for which day passes will be sold) dramatically change the uses, intent, and character from the approved PUD.
- Per FLUE Policy 5.1.2., the burden is on the Applicant to demonstrate that this zoning change is compatible with surrounding development and consistent with the plan through evaluation of factors such as: potential need for improvements to public facilities or services; impacts to environmentally sensitive areas, agricultural activities, and rural character; consistency with the urban growth boundary; consistency with the LDC and Comprehensive Plan; compatibility with surrounding land uses; and evaluation of water supply. These conditions are not met.
- The change to public amenities for a themed water park with bar and restaurant facilities for which day passes will be sold is inconsistent with Policy 3.3.1 of the Future Land Use element, which specifies that “all Zoning Changes and Special Use Permits within the Farmland Preservation Area be consistent with and preserve, protect, support, and enhance the rural, equestrian, and farmland character of the Farmland Preservation Area.”
- The change to public amenities is not compatible with surrounding properties that are predominately rural, agricultural, and low-density residential in character.
- The Staff Report indicates that a Traffic Study methodology was approved in October 2005 but the Traffic Study is still being conducted. The Staff Report also states, “the PUD project’s most significant consideration relates to transportation network impacts as additional traffic from amenity users is the primary concern.” The proposed changes present adverse impacts to the public interest due to transportation network impacts related to additional traffic from amenity users.

In summary, the approved PUD is not a tool to authorize new uses and a change in intent and character under the veil of “amenities.” Evolving site plan submissions should not provide a loophole to avoid review and approval of changes to use and intent and character. Nor is the approved PUD a vehicle for carte blanche enabling of all uses allowed in the Commercial future land use designation. The Marion County LDC requires that uses in a PUD reference a zoning classification or be indicated in a list, and uses were identified and approved for this PUD in alignment with Recreational Resort. If the logic of allowing uses like a bar or any commercial use (as long as it is labeled amenity or accessory) through the PUD site review process is continued, this leaves open the door for uses such as a hotel, nightclub, or truck stop facility (among others) to be considered for the site. These would be limited to the intensity for the approved PUD of 0.17 FAR. For this 6,136,065 square foot property, that would amount to 1,043,131 square feet—the equivalent of roughly 16 American football fields or 10 typical Walmart supercenters.

The remainder of this memo reviews the facts and evidence associated with this application that were used in determining my recommendation. The memo is structured as follows:

- I. Summary
- II. Planned Unit Development Policy Framework
- III. Approved PUD
- IV. DRC Reviews 2017-2025
- V. Contextual Considerations
- VI. Case 260207ZP Rezoning Application
- VII. Recommendation
- VIII. Conclusion

Appendix:

- Evangeline Linkous, PhD, AICP Curriculum Vitae
- Articles and Website Images Referenced in Contextual Considerations

My analysis is based on public information including Municode and the Marion County website as well as consultation with County Staff. I possess the requisite specialized knowledge, skills, experience, and training as evidenced by my PhD and Master degrees in Urban and Regional Planning, record of peer-reviewed research publications on land use planning and more than 20 years of experience in the urban planning profession. My CV is included in the appendix.

II. Planned Unit Development Policy Framework

This section highlights guidance in Florida Statutes and Marion’s LDC relevant to the rezoning application.

Florida Statutes

In Florida, Planned Unit Development (PUD) is regulated under Florida Statutes Chapter 163, Part II, which provides this definition:

“Planned unit development” or “master planned community” means an area of land that is planned and developed as a single entity or in approved stages with uses and structures substantially related to the character of the entire development, or a self-contained development in which the subdivision and zoning controls are applied to the project as a whole rather than to individual lots.

Thus, State law indicates that PUD is about planning and development of a project as a whole or through approved stages; and that PUD uses and structures must relate to the character of the entire development OR subdivision and zoning controls applied to the project as a whole.

Marion’s Land Development Code

The County’s LDC Section 4.2.31 establishes the rules and processes for PUD.

Intent of Classification

Planned Unit Development (PUD) is a zoning classification identified in the Marion County LDC. Per the Code, zoning classifications regulate issues including location, use, height, lot coverage, and green spaces. The intent of the PUD classification as described in the Code is to 1) plan land as a whole; 2) simplify approval procedures; 3) provide flexibility in design; 4) allow a variety of housing types; 5) provide the developer freedom to take a creative approach to the use of land and physical development; and 6) support multimodal design. This intent aligns with Florida Statutes in emphasizing the planning of land as a whole.

Permitted Uses

The Permitted Uses section of the Code [LDC 4.2.31(B)] has critical relevance for the rezoning application under review, and therefore is reproduced in full here:

Sec 4.2.31 Planned Unit Development

B. Permitted uses:

- (1) Any permitted use, special use, or accessory use in any zoning classification listed within the County's LDC, including, manufactured buildings or manufactured homes, may be considered in a PUD, provided the proposed use is consistent with the County's future land use designation for the site, and the provisions of the LDC for each use.
- (2) Uses identified as ordinarily requiring a Special Use Permit in the Division may be authorized as permitted within all or a part of a PUD without the necessity of a separate SUP application, Division 2.8 review and approval as long as the following apply to the requested use:
 - (a) The special use is identified for inclusion within the PUD as part of the PUD Conceptual Plan materials,
 - (b) The special use is accessory to and completely internal to the PUD wherein the internal location is sufficiently internal to the PUD that the location(s) of the special use are setback equal to, or greater than, any required supplemental minimum surrounding property owner public notice area and/or any related protection zone for that use (e.g., telecommunications tower, wellhead protection area, etc.), and
 - (c) The special use is consistent with the Comprehensive Plan, demonstrates compliance with the general SUP application review criteria listed in Sec. 2.8.2.C, and demonstrates compliance with any specific requirements applicable to that special use as may be listed elsewhere within this Code.
- (3) Owners of parcels within the PUD may subsequently request the authorization of additional special uses following approval of the PUD by undertaking the SUP application process for the proposed additional use without applying for an amendment to the PUD
- (4) As part of any PUD, the PUD shall set forth the permitted uses and all incorporated special uses by using one or more of the following methods, provided the uses are consistent with the PUD site's Comprehensive Plan future land use designations and their provisions of this section:
 - (a) Incorporate by reference one, or more, of the standard zoning classifications as listed elsewhere in this Division.
 - (b) Provide an independent specific list of uses for the PUD,
 - (c) Provide an independent specific list of prohibited uses for the PUD.
- (5) For the PUD, the intended character of the PUD shall be identified, including the structure types, architectural styles, ownership forms, amenities, and community management form (e.g., property owner association, community development classification, municipal service unit, etc.) or suitable alternative, all of which must be approved by the Board upon final consideration of the PUD approval.

Several provisions in LDC 4.2.31(B) on Permitted Uses in a PUD are relevant to the rezoning application under review:

- The Code indicates that uses and structures in any zoning classification may be considered in a PUD provided such use is consistent with the future land use designation and provisions of the LDC..
- The PUD must set forth the permitted and special uses by one of the following 1) reference to one or more zoning classifications; 2) an independent list of specific uses for the PUD; or 3) an independent specific list of prohibited uses for the PUD.
- In alignment with Florida Statutes, the intended character of the PUD should be identified, including amenities.

A critical takeaway is that the Marion County LDC requires a PUD to set forth permitted uses. Although the code does indicate that “uses and structures in any zoning classification may be considered in a PUD provided such use is consistent with the future land use designation and provisions of the Land Development Code”—this language is clear that such uses may be *considered* (not approved carte blanche) and must comply with the LDC—which requires that uses in a PUD reference a zoning classification or be indicated in a list.

Procedure for Rezoning to the Planned Unit Development (PUD) Classification

Uses and intent and character of the PUD, including amenities, must be identified for rezoning to PUD. A PUD rezoning application must include a Conceptual Plan, which must show, among other items: a list of the uses proposed for the development, proposed zoning and development standards (setbacks, FAR, building height, etc.), and phasing.

PUD Amendments

This section includes two parts, which distinguishes between changes subject to the review and approval by either the:

- 1) DRC, which reviews issues related to the plan of development such as changes to street alignment or slight shifts in building locations.
- 2) Board, which reviews “major changes” such as density, intensity, and intent and character of development.

III. Approved PUD

This section summarizes the procedural history and key attributes of the approved PUD.

Early Actions

The Board originally approved a rezoning of the property from A1 (General Agriculture) to RR (Recreational Resort) on February 20, 2001, Item #010218Z. A Special Use Permit to construct and operate a wastewater treatment plant and wellfield/water plant was approved by the Board on June 20, 2006 Resolution #06-R-250. A master plan approved by DRC on October 30, 2006 specifies 599 park model units and special use permits for an onsite wastewater and water plant.

2011 Rezoning

In 2011, the site had a Commercial Recreation future land use designation and was zoned Recreational Resort (RR). An *Application for Rezoning* was filed with an indicated *Intended Use* of Recreational Resort.

The first sentence of the associated Staff Report for this rezoning reads:

A request to rezone approximately 140.91 acres from RR (Recreational Resort) to PUD (Planned Unit Development) Recreational Resort.

The Comments section of the Staff Report further indicates:

The applicant proposes to rezone the 140.91 acre property from RR (Recreational Resort) to PUD (Planned Unit Development) Recreational Resort.

The Comments section further indicates:

The applicant is now proposing to rezone the property to PUD in order to develop the site for an RV resort with a mix of upscale RV sites and approximately 80 cabin units. The PUD Master Plan submitted with the application depicts the location of the RV and cabin units. Additionally, the plan includes four typical unit layouts, which reflect tiered "packages" of onsite amenities, including optional firepits, water features, outdoor kitchens, and storage buildings (Casitas). The PUD zoning will accommodate greater design flexibility for the applicant and allow for the platting of the individual lots for sale.

Although the PUD Master Plan referenced in the 2011 Staff Report was not included in the 2011 rezoning agenda packet documentation, this refers to the Master Plan dated December 13, 2010 referenced in the Case at hand (260207ZP). This Master Plan was

included among the approval documentation associated with the 2017 Renewal of the PUD, and thus I will discuss its content in detail in that section of this memo to avoid repetition.

The Board approved the rezoning on February 15, 2011 (110210Z).

2013-2014

Sonoma Ridge Partners, LLC acquired the property in 2013. A Special Use Permit for cattle grazing on the property was approved on February 18, 2014, Item #140202SU. The 2035 Comprehensive Plan was adopted in 2014 resulted in a change in future land use designation for the property to Commercial.

2017 Renewal

In 2017, the applicant sought to renew the existing PUD on Parcel 02781-0000-00 which had expired because a preliminary plat or major site plan was not submitted within the two calendar year window of approval. On April 18, 2017 the Board approved the renewal. The Approval Letter documentation includes the Master Plan dated December 13, 2010 as well as a Staff Report (which indicates that “the applicant has submitted the master plan to the DRC for re-approval.” Nothing in the 2017 PUD renewal approval documentation indicates any changes from the 2011 PUD—this is simply a renewal.

Approved PUD

The approved PUD for Parcel 02781-0000-00 may be understood through the documentation associated with the initial 2011 rezoning to PUD and the 2017 renewal inclusive of the December 13, 2010 Master Plan. Collectively, these documents are analyzed here with two key attributes of the approved PUD noted.

#1 – The PUD for Parcel 02781-0000-00 was approved for Permitted Uses associated with the Recreational Resort zoning designation, as evidenced by 1) the reference to the Recreational Resort zoning classification; and 2) listed uses, which all align with Permitted Uses allowed in the Recreational Resort zoning classification.

As shown in Section II of this memo, Marion’s code requires that a PUD “set forth the permitted uses and all incorporated special uses” through a zoning reference, list of uses, or list of prohibited uses. This information may be gleaned from the 2011 application in two ways:

- Zoning Reference – The 2011 Staff Report explicitly indicates a rezoning to PUD-Recreational Resort on the cover page and in the comments.
- List – Among the application materials, the only place where uses are clearly identified is the December 13, 2010 Master Plan, summarized here:
 - Zoning and Unit Information:
 - Cottage Units
 - RV Units
 - Accessory Buildings
 - Proposed Development language (first column): “The proposed development on this site will be 599 park model units with a club house.”
 - Proposed Development language (second column): Roadway/pavement, unit coverage, lift station, water treatment plant, wastewater treatment plan, convenient store, club house, and 45th Ave Road.
 - On Site Scheme (and not otherwise listed in Proposed Development language):
 - Proposed convenience store/laundromat/hair salon: This convenient store will serve the Oakwater Village Development only.
 - Proposed tennis courts

All listed uses are Permitted or Special Uses for the Recreational Resort zoning classification as identified in *Table 4.2-5 Commercial Zoning Classification Permitted and Special Uses* of the Marion County LDC.

It is plain to see that the approved PUD *both* specifically references the Recreational Resort zoning classification and lists only uses that conform to those allowed in Recreational Resort. To be clear, the PUD for Parcel 02781-0000-00 was approved for uses associated with the Recreational Resort zoning designation in conformance with LDC 4.2.31(B4).

This is of critical relevance to the current case (260207ZP) because any interpretation of the approved PUD for Parcel 02781-0000-00 (approved 2010 and renewed without changes in 2017) as enabling all uses allowed in the Commercial future land use designation (designated in 2014 with adoption of the Marion 2035 Comprehensive Plan) ignores both 1) the code provision that uses in a PUD reference a zoning classification or be indicated in a list; and 2) the Permitted Uses set forth for the approved PUD. Allowing all commercial uses is neither the intent nor the *prima facie* language of the code, which specifies in the ways that Permitted Uses [LDC 4.2.31(B4)] for PUD are established.

#2 – The identified intent and character, including amenities, of the approved PUD is Recreational Resort. The approved PUD does not include public amenities and, to the degree that amenities are identified, these are private and small-scale and align with Recreational Resort.

As shown in Section II of this memo, LDC 4.2.31(B5) requires the intent and character of the PUD to be identified. Recall that the 2011 *Application for Rezoning* indicated an *Intended Use* of Recreational Resort. Taken together with the referenced zoning classification Recreational Resort and listed uses associated with Recreational Resort, the intent and character of the approved PUD is plainly that of a Recreational Resort.

Furthermore, the LDC indicates that amenities should be identified. In terms of amenities, these may be gleaned from the identified uses on the Master Plan, including the convenience store/laundromat/hair salon that will serve the development only, club house, and tennis courts. Additionally, the Staff Report references, “onsite amenities, including optional firepits, water features, outdoor kitchens, and storage buildings.” All identified amenities are private and small-in-scale and conform to the intent and character of Recreational Resort.

IV. DRC Reviews 2017-2025

From 2017-2025, seven reviews by the DRC took place for Parcel 02781-0000-00 through which the “site Master Plan and subsequent Major Site Plans for the facility progressed” (per Staff Report for Case 260207ZP, p7) as summarized here.

June 2021

For the June 2021 DRC review, the Agenda Packet includes a Major Site Plan and Site Plan with several significant changes compared to that approved in 2017, specifically:

1. Changes in street location and connections.
2. Zoning and Unit Information is changed.
 - a. 2017
 - i. Cottage Units – Setbacks 20” front, 5” rear, 5’ side with max impervious area 1,215 SF
 - ii. RV Units – Setbacks 10” front, 5” rear, 5’ side with max impervious area 2,400 SF;
 - b. 2021
 - i. RV Pull-Through Units – Setbacks 10” front, 5” rear, 5’ side with max impervious area 1,780 SF
 - ii. RV Units - Setbacks 10” front, 5” rear, 5’ side with max impervious area 1,000 SF
3. The Site Plan now includes Proposed Coverage information as follows:

<i>EXISTING PAVEMENT:</i>	<i>67,838 S.F. (1.11%)</i>
<i>PROPOSED BUILDINGS:</i>	<i>10,100 S.F. (0.17%)</i>
<i>PROPOSED CONCRETE RV PADS:</i>	<i>323,719 S.F. (5.27%)</i>
<i>PROPOSED CONCRETE SIDEWALK:</i>	<i>5,683 S.F. (0.09%)</i>
<i>PROPOSED AMENITIES:</i>	<i>23,885 S.F. (0.39%)</i>
<i>PROPOSED PAVEMENT:</i>	<i>719,252 S.F. (11.72%)</i>
<i>TOTAL PROPOSED IMPERVIOUS:</i>	<i>1,150,477 SF (18.74%)</i>
<i>OPEN SPACE:</i>	<i>4,987,608 SF (81.26%)</i>
4. On the Site Plan, the Proposed Development language now reads: “The proposed development on this site will be an RV park with approximately 491 RV units along with a clubhouse and amenity facilities.”
5. In the design, the plan now shows a cluster of labeled recreational uses that would be typical to a Recreational Resort with square footage identified by use including: Pickleball Courts (1,200 SF), Club House (7,700 SF), Pool/Deck Area

(7,700 SF), Shuffle Board (4,495 SF), and Bocce Court (4,495 SF) [Note that I can only clearly read the first thousandth digit place due to poor image quality.] A Tennis Court is no longer indicated. An Effluent Disposal Area is indicated to the southwest of this recreational cluster.

Minutes for the meeting are not available on the Marion County website but it may be inferred that the site plan was approved based on Attachment C for Case 260207ZP which shows an Approved Phase 1 Major Site Plan dated March 22, 2021. This site plan includes changes to street locations and connections, which is content that should have gone before the Board per LDC Section 4.2.31.K(2), raising issues of application of correct law and legal delegation of authority.

January 2022

For the January 2022 DRC review, the Agenda Packet includes a Major Site Plan and Site Plan with several significant changes, specifically:

1. In the design, the plan now shows two new proposed bath house and laundry facilities.
2. To the southwest of the recreational use cluster, a wastewater treatment plan is now shown instead of an effluent disposal area.

Meeting minutes show DRC approval of waivers for Phase 1 related to Shade Trees, Parking Areas & Vehicular Use Areas, and DRA Maintenance Berm Width.

May 2023

As part of the May 2023 DRC review, the applicant requested and received approval for a waiver to the Major Site Plan for two proposed bath houses on the site that were not part of the approved plans for Phase 1. The Agenda Packet includes a plan labeled Bath House #3 &4 Site Plan with several significant changes, specifically:

1. An existing #1 bath house & laundry and an existing #2 bath house & laundry are shown in the locations shown as proposed in the January 2022 plan.
2. A proposed #3 bath house & laundry and a proposed #4 bath house & laundry are now shown.

3. The cluster of recreational uses is reconfigured and now indicates a 17,040 SF pool/deck area and 10,936 SF club house. The bocce and shuffleboard courts are much reduced in size.

The Agenda Packet does not include a Major Site Plan so information about proposed changes to uses and coverage was not provided.

December 2023

As part of the December 2023 DRC review, the applicant requested and received approval for a waiver to the Major Site Plan – Phase 2 for shade trees, environmental assessment & site analysis map, construction specifications, freeboard, discharge conditions, geotechnical criteria, and topographical contours. The Agenda Packet includes a Major Site Plan for Phase 2 and Site Plan (both dated July 26, 2023) depicting several significant changes, specifically:

1. The recreational cluster is now an empty white square outlined in red and labeled as Phase 2 Clubhouse Pool.
2. To the southwest is now an empty white square outlined in red and labeled as Phase 2 Amenities.
3. In the approved PUD, the clubhouse feature was included in Phase 1, so a major change in Phasing is introduced at this point.
4. Zoning and Unit Information is changed.
 - a. RV Pull-Through Units – maximum impervious area increases from 1,780 SF in 2021 to 2,015 SF
 - b. RV Units/Park Model Units - maximum impervious area increases from 1,000 SF in 2021 to 1,225 SF
5. The Site Plan includes changes in Proposed Coverage compared to 2021, specifically:
PROPOSED BUILDINGS: was 10,100 S.F. (0.17%); now 13,561 S.F. (0.22%)
PROPOSED CONCRETE RV PADS: was 323,719 S.F. (5.27%); now 423,981 S.F. (6.91%)
PROPOSED CONCRETE SIDEWALK: was 5,683 S.F. (0.09%); now 9,086 S.F. (0.15%)
PROPOSED AMENITIES: was 23,885 S.F. (0.39%); now 31,906 S.F. (0.52%)
PROPOSED PAVEMENT: 698,482 S.F. (11.38%)
TOTAL PROPOSED IMPERVIOUS: was 1,150,477 SF (18.74%); now 1,244,854 SF (20.28%)
OPEN SPACE: was 4,987,608 SF (81.26%); now 4,893,231 SF (79.72%)

A Geometry Plan (dated July 23, 2023) is also included in the packet which depicts complex site planning for both the Phase 1 clubhouse pool suggesting elaborate slide and lazy river components. Additionally, site planning for the amenities are shown with geometric shapes but specific uses are not identified except two covered pavilions.

February 2024

As part of the February 2024 DRC review, the applicant received approval for waivers related to Phase 2 shade trees and buffers.

April 2024

As part of the April 8, 2024 DRC review, the applicant submitted a Development Review Plan Application and received approval in the Consent Agenda. The Application indicates: “This submittal is for Phase 2 – Project area is 36.45 acres, includes updated clubhouse, pool and amenities area.” The Agenda Packet includes the Major Site Plan for Phase 2 and Site Plan (both dated July 26, 2023) as well as the Geometry Plan (dated July 23, 2023) included in the December 2023 Agenda Packet.

As already discussed for December 2023, these documents show changes in proposed coverage and depict complex site planning for both the clubhouse pool area suggesting elaborate slide and lazy river components. Additionally, site planning for the amenities are shown with geometric shapes but specific uses and structure types are not identified except two covered pavilions. This review appears to authorize a change in Phasing compared to the approved conceptual plan, which includes the pool and clubhouse in Phase 1. The Phase 2 amenity area is depicted to the southwest of the clubhouse pool area in a location previously depicted for roadway, units, and wastewater facilities. Four bathhouses are shown (two existing and two proposed), although I can only identify approvals for two. The site plan shows an increase in proposed building square footage, an increase in proposed amenities square footage, an increase in proposed impervious square footage, and a decrease in open space.

The Phase 2 Site Plan appears to have been approved at this review based on Attachment D for Case 260207ZP which shows an Approved Phase 2 Major Site Plan dated July 26, 2023. The Phase 2 site plan should have gone to the Board for approval for several

changed items identified here but, moreover, because a change in intent and character starts to take shape here in the reconfigured amenities, again raising issues of application of correct law and legal delegation of authority.

Analysis

The DRC review history demonstrates approved changes (including the Phase 1 Site Plan approved June 2021 and Phase 1 Site Plan approved April 2204) that depict PUD changes, including:

- Changes in zoning and unit information and a change in the number of units.
- Changes in intensity and proposed coverage and a decrease in open space.
- Introduction of a cluster of recreational uses. Over time, this area evolves dramatically. In the original PUD, a pool and clubhouse is indicated. By May 2023, a 17,040 SF pool/deck area and 10,936 SF club house are noted. By December 2023, plans depict a much larger pool area including a lazy river and slides.
- Amenities are indicated but change over time such that uses, structure types, and architectural styles for amenities are unclear, creating ambiguity about PUD intent and character.
- Existing bath house & laundry (1&2) facilities are noted without any indication of associated review and approval.
- Changes in the location of water and sewage facilities, specifically a relocation of the wastewater treatment plant into an area previously identified for effluent disposal.
- Changes in phasing plan.

Overall, this history calls attention to two concerning issues:

- PUD provisions – The DRC approved changes that are specified for review and approval before the Board per LDC Section 4.2.31.K(2), raising issues of application of correct law and legal delegation of authority.
- Changes from approved PUD: PUD amenities, which are central to PUD intent and character, change substantially in number, size, and location. Information on changed amenities such as uses is not clearly set forth.

V. Contextual Considerations

Additional information is publicly available that provides context for the Case.

Camp Margaritaville Resort Orange Lake

A marketing-oriented website describes a “Camp Margaritaville Resort Orange Lake” that clearly relates to the parcel and PUD in Case 260207ZP. The website includes an Amenities page (<https://www.margaritavilleresorts.com/camp-margaritaville-orange-lake/stay/amenities>) [accessed February 9, 2026] with an inset titled “Camp Margaritaville Amenities,” the content of which I reproduce here:

Camp Margaritaville Amenities

- Welcome Center
- Fins Up Falls Water Park
- Fins Up! Fitness Center
- Barkaritaville Dog Park
- Fins Bar & Chill
- Tiki Bar
- Dreamsicle Sugar Shop
- Joe Merchant’s Camp Provisions with coffee, snacks, and Camp Margaritaville gear and souvenirs
- Arcade
- Florida Hospitality Suite (1,071 sq. ft.) for parties and events
- Golf Cart Rentals
- Bath Houses
- Laundry Facilities

Fins Up Falls Water Park is described as follows: “Make a splash at our on-site water park featuring pools, a legendary water slide, a lazy river, and kid-friendly splash pads.”

The website also mentions live entertainment at Six Strings stage.

The amenities portrayed on the website differ dramatically from what is indicated in the PUD. The website identifies a water park, a bar, a bar and restaurant (Fins Bar and Chill which is described as a full-service restaurant), and two shops. The set of uses described on the website points to a change in uses and intent and character for the property that differ markedly from those in the approved PUD.

Campa Margaritaville Auburndale

To provide additional context, I briefly describe here Camp Margaritaville Auburndale, a comparable existing facility that opened in January 2022. Amenities for the project are described on the website (<https://www.margaritavilleresorts.com/camp-margaritaville-rv-resort-auburndale/resort/amenities>) [Accessed February 10, 2025]. These include a 147-foot water slide, mini golf course, camp store, and more.

An article about Margaritaville Auburndale appeared on Fox 13 Tampa Bay news on September 21, 2021 (<https://www.fox13news.com/news/polk-leaders-hope-camp-margaritaville-puts-county-on-the-map>) [Accessed February 10, 2026]. Select passages from the article are included here, to which I added use of bold to emphasize relevant content:

The resort will retain its current owners and staff, but its **draw is expected to be a lot stronger** because of the success of Margaritaville's laid-back, highly successful brand.

"It is going to be a **game-changer** for the city," said Auburndale Mayor Tim Pospichal.

Modern Campground Article

An article about Camp Margaritaville Resort Orange Lake dated January 29, 2026 appears on the website for Modern Campground (<https://moderncampground.com/usa/florida/camp-margaritaville-resort-seeks-zoning-changes-for-public-water-park-access-and-145-foot-slide-tower/>) [accessed February 9, 2026]. Select passages from the article are included here, to which I added use of bold to emphasize relevant content:

Developers behind Camp Margaritaville Resort Orange Lake in Citra, Florida, are pursuing zoning modifications that would allow the sale of day passes to the public at the property's water park. The changes would also permit construction of a 145-foot slide tower, a move that could bring the region its first **major water attraction** since Wild Waters closed nearly a decade ago.

If approved, the changes would transform what was **originally planned as a guest-only amenity into a potential destination for residents across Central Florida...**

The zoning petition centers on **modifying the property's Planned Unit Development agreement, which originally restricted water park amenities exclusively to overnight guests** staying at RV sites and cottages. Under the

proposed changes, the resort would gain authorization to sell day passes to local residents and visitors who are not registered overnight guests.

The request reflects a broader trend among outdoor hospitality properties exploring **amenity monetization as a revenue diversification strategy**. Across the industry, premium **amenities at RV parks and campgrounds have increasingly functioned as independent revenue centers** rather than simply perks reserved for registered guests.

Capacity management has become essential when mixing overnight guests with day visitors, with guest-to-day-visitor ratios helping prevent **overcrowding** while protecting the experience for guests who expect amenity access as part of their stay.

Operational considerations for properties weighing this model include **increased staffing requirements for admission management**, additional liability insurance coverage, **enhanced maintenance schedules due to higher facility usage, and potential parking infrastructure expansion**.

Beyond public access, the zoning petition includes a request to dramatically increase the maximum allowable height for water park structures. Current zoning restricts construction to 40 feet, but 8M Holdings is seeking permission to build up to 145 feet to accommodate a planned four-slide tower complex. The developer envisions this tower as a centerpiece attraction capable of drawing visitors from throughout the region.

The article raises the same concerns as the website, identifying a change in amenities, uses, and intent and character for the property that differ markedly from those in the approved PUD. Like the website, the article characterizes the pool complex as a water park. In this case, the article explicitly describes the water park as a major regional attraction that will require consideration of capacity management due to potential overcrowding as well as potential infrastructure expansion. The water park attraction is described as “amenity monetization as a revenue diversification strategy”—which is certainly different from the small-scale, private amenities associated with Recreational Resort for the approved PUD.

VI. Case 260207ZP Rezoning Application

Case 260207ZP is an application to rezone a 140.91-acre site located outside the Urban Growth Boundary, in the Farmland Preservation Area (FPA), in the Silver Springs Secondary Springs Protection Zone (S-SPOZ), and in Marion County's NW Regional Utility Service Area.

Application

The Staff Report indicates that Case 260207ZP is a Rezoning for PUD Modification:

FROM: Planned Unit Development (PUD) – RV Park with private amenities

TO: Planned Unit Development (PUD) – RV Park with public amenities

A Memorandum from the Applicant is included with the Application and indicates:

This application is provided for the purpose of making two text amendments to the previously approved P.U.D. Master Plan (the “Master Plan”) for the above reference project, a copy of said Master Plan is enclosed herewith. The requested text amendments are as follows:

1. Delete the following language from Page 3 of the Master Plan: “Proposed convenience/store/laundromat/hair salon. This convenient store will serve the Oakwater Village development only.”
2. Add the following language: RV parking spaces may be used for vehicular parking for guests and employees.

No other changes are requested to the Master Plan at this time.

This framing is misleading and does not accurately or completely describe the decision involved in this Case, and the Board should refer to the “Rezoning for PUD Modification” language established by the Staff Report.

The Master Plan included with the application materials is the one dated December 13, 2010, which is the Master Plan for the approved PUD.

Staff recommended that the PUD be approved with conditions. Among the proposed development conditions the Staff Report includes: “The PUD shall be developed consistent with the submitted PUD Conceptual Plan (12/23/24)...” The Conceptual Plan referenced here with the December 23, 2024 date is not included in the Agenda Packet. I requested more information from staff about this referenced plan during a February 12, 2026 virtual meeting and they indicated that this was a typo. This language should have instead referenced the December 13, 2010 approved plan.

Recommended Action: Deny

The decision in this Case centers around the change to public amenities. The Staff Report indicates, “The PUD proposes text changes that will enable non-RV user day-use operations of the RV Park amenities (themed recreation area – pool, bar/restaurant, play facilities, etc.) at the determination of the developer/operator.” The pool slide complex is described in the Staff Report and attachments as consisting of four slides and their access towers. These described amenities (a themed water park with bar and restaurant facilities for which day passes will be sold) dramatically change the uses, intent, and character from the approved PUD.

If the Board wishes to proceed with review, the Board must consider:

- Requirements in Marion’s LDC Section 4.2.31 on PUD; and
- Three criteria for a rezoning: 1) consistency with the Comprehensive Plan; 2) compatibility with the land uses of surrounding properties; and 3) no adverse impact on the public interest.

Code Requirements

- LDC 4.2.31(B) Permitted Uses – As discussed at length in this memo, LDC 4.2.31(B) addresses permitted uses and establishes three methods for setting forth the list of permitted and special uses. The approved PUD sets forth uses through reference to the Recreational Resort zoning classification and a listing of uses that align with Recreational Resort zoning. All identified and approved amenity uses are private and small-in-scale and conform to the intent and character of a Recreational Resort and are of an accessory nature, supporting RV park lot users. Amenity uses involving a “day-pass-for-fee” for the public are not identified. The proposed change is inconsistent with the code provisions.

Additionally, as noted in the Staff Report, the facility will be subject to the Marion County Code of Ordinances Chapter 13, Noise & Vibration Control. The noise ordinance measures levels from the generator, at the receiver’s property line. In this case the levels are 65dba during the day and 55dba from 10pm to 7am. Those are difficult to meet—and in light of the private amenities now becoming a public water park—the Applicant should

be required to prepare an acoustic analysis to demonstrate they can comply with these levels.

Consistency with the Comprehensive Plan

FLUE Policy 3.3.1

The rezoning is plainly inconsistent with Policy 3.3.1 of the Future Land Use element, which requires that “all Zoning Changes and Special Use Permits within the Farmland Preservation Area be consistent with and preserve, protect, support, and enhance the rural, equestrian, and farmland character of the Farmland Preservation Area.” This is a clear directive affirming the County’s commitment to appropriate land uses and development character within the Farmland Preservation Area.

Elements of rural character covered in this policy include protection of scenic views through protection from visual intrusions. Policy 3.3.1 also calls for lighting and transportation design compatible with rural character. A water park attraction is likely to impact views, generate increased traffic, and require lighting that will impact the character of the Farmland Preservation Area. A themed water park with bar and restaurant facilities for which day passes will be sold is inconsistent with “rural, equestrian, and farmland character.” The change is thus inconsistent with Policy 3.3.1.

It should be noted that the approved PUD with private amenities pre-dates Policy 3.3.1. I take no position in this memo with respect to the previously-approved PUD. However, the change to public amenities in the proposed rezoning fails to meet Policy 3.3.1 standards.

FLUE Policy 5.1.2

Per FLUE Policy 5.1.2., the burden is on the Applicant to provide an evaluation demonstrating that this zoning change meets several conditions:

FLUE Policy 5.1.2: Review Criteria – Changes to Comprehensive Plan and Zoning. Before approval of a Comprehensive Plan Amendment (CPA), Zoning Changes (ZC), or Special Use Permit (SUP), the applicant shall demonstrate that the proposed modification is compatible with existing and planned development on the site and in the immediate vicinity, and shall evaluate its overall consistency

with the Comprehensive Plan, Zoning, and LDC and potential impacts on, but not limited to the following:

1. Market demand and necessity for the change
2. Availability and potential need for improvements to public or private facilities and services;
3. Allocation and distribution of land uses and the creation of mixed-use areas;
4. Environmentally sensitive areas, natural and historic resources, and other resources in the County;
5. Agricultural activities and rural character of the area;
6. Prevention of urban sprawl, as defined by Ch. 163, F.S.;
7. Consistency with the UGB;
8. Consistency with planning principles and regulations in the Comprehensive Plan, Zoning, and LDC;
9. Compatibility with current uses and land uses in the surrounding area;
10. Water supply and alternative water supply needs; and
11. Concurrency requirements.

A themed, public water park is likely to present issues related to improvements to public facilities or services; impacts to environmentally sensitive areas, agricultural activities, and rural character; consistency with the urban growth boundary; consistency with the LDC and Comprehensive Plan; compatibility with surrounding land uses; and evaluation of water supply. However, the application offers no insight into these compatibility and consistency issues and is thus inconsistent with Policy 5.1.2.

Compatibility with the Land Uses of Surrounding Properties

For this analysis, I refer to Table A of the Staff Report for Case 260207ZP, which shows the FLUM Designation, Zoning classification, and Existing Use for properties adjacent to the site. I summarize this table here:

- FLUM Designation – Of the five properties, three are Rural Land (RL), one is “WATER,” and one is Commercial (COM)
- Zoning Classification – Of the five properties, two are General Agricultural (A-1), one is Alachua County (the WATER property, which is Orange Lake), one is Recreation Vehicle Park (P-RV), and one is Regional Business (B-4).
- Existing Uses – A mix of Orange Lake, single family homes, the Lakeside Oaks subdivision, Grante Lake RV & Golf Resort, and the Ocala Jai-Alai Fronton & Card Room.

As can be seen, surrounding properties are predominately rural, agricultural, and low-density residential in character. While recreational amenities that are private and small-in-scale fit well within this context—and are approved in the PUD—a themed water park does not.

No Adverse Impact on the Public Interest

The Staff Report indicates, “A Traffic Methodology for the project was approved in October 2025 to establish the analysis methodology for a Traffic Study to examine the transportation network impacts from the expanded use opportunities for the site. The Traffic Study is currently being conducted at this time, and staff notes the Study is also utilizing data from a comparable existing facility owned by the developer for the analysis consideration.” Given that the Traffic Study is not yet available, I refer to the information provided in Section V of this memo, which describes a comparable existing facility, Camp Margaritaville Auburndale. As indicated in the article, “the draw is expected to be a lot larger” for an RV Park when rebranded and repurposed as a Margaritaville resort.

Due to high visitor volume and the potential for high-altitude incidents, theme resort parks often require extensive fire, rescue/emergency, and police services. Resorts may operate their own specialized responder teams who work in tandem with public responder services. Given the indicated likelihood of higher visitor volume related to expanded use opportunities, impacts to County responder services are likely. Also, as noted, the Applicant should demonstrate how they can comply with County noise regulations.

I concur with the Staff Report statement: “In conclusion, the PUD project’s most significant consideration relates to transportation network impacts as additional traffic from amenity users is the primary concern.” A significant increase in traffic volume is associated with a change in use to a themed water park and this will have an adverse impact on the public interest.

Based on this analysis, I recommend the following action:

Enter into the record the Staff Report and all other competent and substantial evidence presented at the hearing, adopt the findings and conclusions contained herein, and make a recommendation to DENY the rezoning amendment.

VIII. Conclusion

This memo summarizes my analysis of the facts of the case and concludes with a recommended action:

Recommended Action: Deny

The decision before the Board centers around the change to public amenities. The Staff Report indicates, “The PUD proposes text changes that will enable non-RV user day-use operations of the RV Park amenities (themed recreation area – pool, bar/restaurant, play facilities, etc.) at the determination of the developer/operator.” These changed amenities were introduced through the site planning process which may continue until a final plan is submitted—and thus additional amenities may be introduced on the site.

The identified amenities (a themed water park with bar and restaurant facilities for which day passes will be sold) dramatically change the uses, intent, and character from the approved PUD. Per FLUE Policy 5.1.2., the burden is on the Applicant to demonstrate that this zoning change is compatible with surrounding development and consistent with the plan through evaluation of factors such as: potential need for improvements to public facilities or services; impacts to environmentally sensitive areas, agricultural activities, and rural character; consistency with the urban growth boundary; consistency with the LDC and Comprehensive Plan; compatibility with surrounding land uses; and evaluation of water supply. These conditions are not met. The change to public amenities for a themed water park with bar and restaurant facilities for which day passes will be sold is inconsistent with Policy 3.3.1 of the Future Land Use element as well as Policy 5.1.2; is not compatible with surrounding properties that are predominately rural, agricultural, and low-density residential in character; and presents adverse impacts to the public interest due to transportation network impacts related to additional traffic from amenity users. Therefore, I recommend the following action:

Enter into the record the Staff Report and all other competent and substantial evidence presented at the hearing, adopt the findings and conclusions contained herein, and make a recommendation to DENY the rezoning amendment.

Appendix

- Evangeline Linkous, PhD, AICP Curriculum Vitae
- Articles and Website Images referenced in Contextual Considerations

Evangeline R. Linkous, PhD, AICP
CURRICULUM VITAE
2026

Associate Professor, Urban and Regional Planning
University of South Florida
School of Public Affairs
4202 East Fowler Ave. – ALN 136
Tampa, FL 33620-8100
813.974.7982
elinkous@usf.edu

ACADEMIC POSITIONS

Program Director, Urban and Regional Planning
University of South Florida, School of Public Affairs
August 2021 – present

Associate Professor, Urban and Regional Planning
University of South Florida, School of Public Affairs
August 2019 – present

Assistant Professor, Urban and Regional Planning
University of South Florida, School of Public Affairs
August 2013 – August 2019

Director
University of Florida, Institute for Food & Agricultural Sciences, Sarasota County Extension
June 2010 – August 2013

EDUCATION

Ph.D. in City and Regional Planning, May 2012
University of Pennsylvania

Master of City and Regional Planning, May 2004
University of Pennsylvania

Bachelor of Arts, English, May 1998
New College of Florida

RESEARCH AREAS

Land Use Policy and Law, Zoning, Growth Management, Property Rights, Fiscal Instruments in Land Policy, Institutions and Land Use Policy, Rural and Exurban Planning

PROFESSIONAL CERTIFICATION

American Institute of Certified Planners, 2010 – present

PUBLICATIONS

Refereed articles

Fang, L., Linkous, E., Holmes, T. J., and Lammers, A. (2025). Transfer of Development Rights for Coastal Adaptation: Conceptual Design and Practical Applications in the United States. *Journal of Planning Education and Research*, 0(0).

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Lincoln Institute of Land Policy. C. Lowell Harriss Dissertation Fellowship. E. Linkous, PI. \$10,000. April 2008.

AWARDS & HONORS

Planner of the Year, Sun Coast Section, Florida Chapter, American Planning Association, 2021.

Proclamation, (in acknowledgement of service as a Planning Commissioner appointed by the City of Temple Terrace), City of Temple Terrace, City Council, 2021

Student Project Award, Assessment of Planning Risks and Alternative Futures for the Florida Transportation Plan Update, Florida Chapter of the American Planning Association; jointly with FSU and UF, 2019

Proclamation, (in acknowledgement of USF Spring 2015 Land Use Planning community engaged course project), Hernando County, Florida Board of County Commissioners, 2015

Outstanding Community-Engaged Teaching Award, University of South Florida, 2014-2015

Service Award, American Planning Association, Sun Coast Section, 2011 – 2013

C. Lowell Harriss Dissertation Fellow, Lincoln Institute of Land Policy, 2008

Best Masters Thesis, Department of City and Regional Planning, University of Pennsylvania, 2004

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Linkous, E. and Skuzinski, T. (2017, February). What happens for planning when states adopt property rights legislation: An application of the institutional analysis and development framework to Florida's Bert Harris Act. International Academic Association on Planning, Law, and Property Rights Annual Conference. Hong Kong.

Linkous, E. and Skuzinski, T. (2016, November). What happens for planning when states adopt property rights legislation: An application of the institutional analysis and development framework to Florida's Bert Harris Act. American Collegiate Schools of Planning Annual Conference. Portland, OR.

Linkous, E., Fernandez, S., and Middleton, K. (2016, September). Tampa's Bro Bowl: Contested histories, emerging technologies. Florida Chapter of the American Planning Association Annual Conference. Tampa, FL.

Linkous, E. (2015, October). TDR for Development Entitlements: An Assessment of Florida's Rural Transfer of Development Rights Programs. Association of Collegiate Schools of Planning Annual Conference. Houston, TX.

Linkous, E. and Parsons, A. (2015, September). Power of Visioning. Florida Chapter of the American Planning Association Annual Conference. Hollywood, FL.

Linkous, E., Green, T., Pianta, R., and Everett, M. (2015, September). Town and Gown: Kass Circle Revitalization Project. Florida Chapter of the American Planning Association Annual Conference. Hollywood, FL.

Chapin, T., Linkous, E., and Schindewolf, J. (2014, November). Innovation Co-Opted: The Curious Case of Fiscal Neutrality in Sarasota County, Florida. Association of Collegiate Schools of Planning Annual Conference. Philadelphia, PA.

Chapin, T., Linkous, E., Schindewolf, J., and Parsons, A. (2014, September). Fiscal Neutrality: Best Practices for Fiscal Impact Assessment and Lessons from Sarasota, Florida. Florida Chapter of the American Planning Association Annual Conference. Jacksonville, FL.

Conference Organizer

Urban (In)Flux: The Impact of Russian Emigres, Alliances, and Legacies on Urban Processes and Space in Tbilisi. (2023, November). University of South Florida Institute for Russian, European, and Eurasian Studies; the USF Global and National Security Institute; and the USF School of Public Affairs.

The Tampa Bay Food System: Planning for Prosperity. (2014, October). Conference jointly hosted by the University of South Florida, University of Florida Institute of Food and Agricultural Sciences, and Florida Chapter of the American Planning Association, Sun Coast Section. Tampa, FL.

Planning Post-9J5: The New Meaning of Planning under Florida's Community Planning Act. (2012, October). UF/IFAS Extension Sarasota County Symposium.

Conference Discussant

Linkous, E. (2017, October). Regional Lessons from the Political Ecology of Exurbia. American Collegiate Schools of Planning Annual Conference. Denver, CO.

Linkous, E. (2017, October). Planning as Process: Interactions of Community, Land, and Food. American Collegiate Schools of Planning Annual Conference. Denver, CO.

Linkous, E. (2014, November). Planning Systems for Managing Growth and its Impacts. American Collegiate Schools of Planning Annual Conference. Philadelphia, PA.

Linkous, E. (2008, July). Land Preservation: What Works, What Does Not Work, and Is It Still a Good Idea? Joint Association of Collegiate Schools of Planning and the Association of European Schools of Planning Joint Congress. Chicago, IL.

Media Coverage and Interviews

“Experts say the USF area could see challenges amid Uptown expansions.” The Oracle. Article by Noah Vinsky, published October 28, 2025.

<https://www.usforacle.com/2025/10/28/usf-challenges-amid-uptown-expansions/>

“Gandy Bridge turns 100, how USF is preserving its history.” University of South Florida Newsroom: Community Partnerships. Article by Paul Guzzo, published November 25, 2024.

<https://www.usf.edu/news/2024/gandy-bridge.aspx>

“USF's president spells out plans for the Claw and promises no development of the Forest Preserve.” *University Beat*, WUSF, Tampa, Air date September 13, 2024.

<https://www.wusf.org/university-beat/2023-07-03/usf-closing-the-claw-golf-course-worry-happen-land>

“USF is closing The Claw golf course. Some worry what will happen to the land.”

University Beat, WUSF, Tampa, Air date July 3, 2023.

“Zoning and Housing in Tampa Bay.” *Florida Matters*. WUSF, Tampa. Air date April 30, 2019. Radio.

Marinec, Amy. (2016, August 9). “Hillsborough community’s fees burden homeowners.” WTSP 10 News. Television interview and news article with quotations.

“Growth, the Economy, and the Environment.” *Florida Matters*. WUSF, Tampa. Air date April 1, 2014. Radio.

Slopes, Rich. (2014, April 11). “Seemingly unusual, Pasco’s land purchase not all that rare.” *Tampa Bay Times*. Interviewed with quotations.

DEPARTMENT SERVICE

- Member, Master of Urban and Regional Planning Studio Advisory Committee, Spring 2025 – present
- Member, School of Public Affairs Evaluation Committee, 2025 – present
- Chair, School of Public Affairs Search Committee, 2023-2024 (3 positions)
- Chair, School of Public Affairs Evaluation Committee, 2023 and 2024
- Member, School of Public Affairs Evaluation Committee, 2023 and 2024
- Organized “A Celebration of Accreditation” event, November 16, 2021.
- Member, Master of Urban and Regional Planning Committee, 2013 – present
- Member, Master of Urban and Regional Planning Comprehensive Exam Committee, 2013 – present
- Faculty Advisor, USF Student Planning Organization, 2013 – present
- Director, Mentor a Planning Student program, 2014 – present
- Member, School of Public Affairs Departmental Review Committee for USF Institutional Review Board, 2015 – present
- Member, School of Public Affairs Strategic Planning Committee, 2013 – 2014
- Editor, *Panorama: The Journal of the Department of City and Regional Planning*, University of Pennsylvania, 2002 – 2004

UNIVERSITY SERVICE

- Member, College of Arts & Sciences, Tenure and Promotion Committee, August 2025 - present
- Member, School of Social Sciences, Tenure and Promotion Committee, August 2025 - present
- Member, University-wide Mid-Tenure Review Committee convened for a position within School of Architecture, 2025
- Chair, USF Council on Educational Policy and Issues, 2019-2020
- Member, USF Council on Educational Policy and Issues, 2018-2021 appointment
- USF Center for Brownfields Research and Development Faculty Expert, 2015 – present
- USF Food and Community Garden Faculty Working Group, 2013 – present
- USF Architecture and Community Design, Cape Coral Bimini Basin Studio, Guest Juror, April 2015
- Graduate Advisor: Hamilton College House, University of Pennsylvania, 2003 – 2006
- Collections Assistant: Architectural Archives, University of Pennsylvania, 2002 – 2004

PROFESSIONAL/COMMUNITY SERVICE

- Planning Commissioner, Hillsborough County City-County Planning Commission, February 2025 – present
- Executive Committee, Florida Chapter of the American Planning Association, Jan 2024 – Dec 2024
- Executive Board, Fulbright Association, Mid-Florida Chapter, June 2023 – present
- Executive Board, Urban Land Institute Tampa Bay, August 2021 – August 2023
- Planning Commissioner, Hillsborough County City-County Planning Commission, February 2021 – December 2021
- Chair, 2021 Project Awards Committee, Florida Chapter of the American Planning Association
- USF University Liaison, American Planning Association (national organization), 2013 – present
- USF University Liaison, American Planning Association, Sun Coast section, 2013 – present
- Resource Team Member, Mayor's Institute on City Design, 2014
- Professional Development Officer, Sun Coast Florida Chapter of the American Planning Association, 2011 – 2013
- Board Member, Sarasota County Fair Board, 2010 – 2013
- Planning Commission, Borough of Malvern, Pennsylvania, 2010
- Advocacy Committee, Delaware Valley Green Building Council, 2008 – 2010

SERVICE TO THE ACADEMY

- Site Visitor, Planning Accreditation Board, 2024 – present
- Member, Association of Collegiate Schools of Planning, Faculty Mentorship Committee, 2024-present
- Chair, Association of Collegiate Schools of Planning, Faculty Mentorship Committee, 2024-2025
- *Journal of Planning Education and Research*, Distinguished Reviewer, 2024-2025
- *American Collegiate Schools of Planning*, Land Use Track Co-Chair, 2016 – 2018

PROFESSIONAL AFFILIATIONS

- American Institute of Certified Planners, 2010 – present
- American Planning Association, Member, 2002 – present
- Florida Chapter of the American Planning Association, Member, 2010 – present
- Urban Land Institute, Member, 2021 – present
- National Association of Community Development Extension Professionals, 2010 – 2013
- Association of Natural Resource Extension Professionals, 2010 – 2013

FELLOWSHIPS & SCHOLARSHIPS

- University Fellowship, University of Pennsylvania, 2004 – 2007
- City and Regional Planning Departmental Merit Scholarship, University of Pennsylvania, 2002 – 2004
- Fels Foundation Summer Student Fellowship. Samuel S. Fels Fund, Philadelphia, PA. 2003 – 2004
- UPS Transportation Planning Scholarship, 2004.
- Woman's Transportation Seminar, Carmen E. Turner Graduate Scholarship, 2004.
- Foundation Fellowship, New College of Florida, 1995 – 1997
- Florida Academic Scholar, State of Florida, 1995 – 1997

TRAINING

- *Journal of Planning Education and Research* New Scholar Summer Writing Workshop. Participation by application and acceptance only. July 2016. Rutgers, New Jersey.
- USF Academy for Teaching and Learning Excellence, 12-week Faculty Writing Learning Community. Fall 2015. Tampa, Florida.
- Alliance for Innovation – Big Ideas: The Future of Local Government. Invitation-only gathering of progressive leaders exploring the future of local government. November 2012. Williamsburg, Virginia.
- LEAD IFAS. Invitation-only leadership training for University of Florida Institute of Food and Agricultural Sciences. 2012-2013. Gainesville, Florida.
- University of Florida Leadership Cohort. Invitation-only leadership training for all UF employees, 2012-2013. Gainesville, Florida.
- Sarasota County Academy of Leadership Excellence. Invitation-only leadership training for Sarasota County leaders. 2011-2012. Sarasota, Florida.

COURSE INSTRUCTION

Environmental and Planning Issues in Coastal Communities

This course provides a general introduction to planning for coastal areas. The first half of the course offers an overview of U.S. coastal planning policy and practices. The second half of the course focuses on Florida, reviewing the state's regulatory framework, political and governance issues, and local planning strategies.

Planning History and Theory

This core planning course provides a general introduction to planning history and theory. Students explore economic, social, and political themes related to urban planning and development in the context of a democratic and capitalist society.

Growth Management

This course provides an overview of the key concepts and tools related to growth management with a focus on Florida's state planning framework.

Food Systems

This course provides an introduction to the food system and how it relates to planning and public policy. Students explore food issues including hunger and health, agricultural production, and community/economic development.

Planning and Public Finance

This course examines fiscal dimensions of public policies related to land use. We explore the way land is used and how that impacts the types of services provided by local governments, the costs of those services, and the revenues they generate. Topics covered include capital budgeting, fiscal impact analysis, and tax increment financing.

Planning Law and Implementation

This course provides an introduction to the American legal framework for land use planning. The course covers landmark planning law cases, addresses the roles and regulations related to citizen participation and different governmental units in land use regulation, and provides instruction on basic concepts in subdivision control and development review.

Land Use Planning

A core planning course that introduces students to theory and techniques used in the planning process. Students evaluate and develop real-world plans, including comprehensive plans, form-based codes, and redevelopment strategies.

Urban and Metropolitan Economic Development Strategies

This course introduces students to theory, contemporary practices, and case studies in urban economic development.

PROFESSIONAL EXPERIENCE

Director

University of Florida Institute of Food & Agricultural Sciences Extension, Sarasota June 2010 – August 2013
Sarasota, FL

- Manage staff of 21 full-time employees, more than 200 volunteers, and part-time staff/interns
- Oversee \$1.6 million budget including University of Florida, Sarasota County, and grant funding
- Oversee education and outreach programs on horticulture, agriculture, sustainability, community development and sustainability, natural resources, and youth/families
- Develop and administer program business model, including long range plan and staffing strategy
- Develop and implement programming on community development, planning, sustainability, public engagement, and food systems
- Direct initiatives to build program relevance and value, including marketing, distance education, and customer service

Planner, Office of Smart Growth
Delaware Valley Regional Planning Commission (DVRPC)

July 2007 – June 2010

Philadelphia, PA

- Conduct research initiatives and develop planning studies that support smart growth in greater Philadelphia; topics include transit-oriented development and brownfields
- Manage sustainability planning projects including transfer of development rights studies and sustainability plan elements
- Coordinate the Regional Community and Economic Development Forum and the Alternative Energies Working Group
- Prepare grant applications to create new project funding streams and manage projects for DVRPC-funded grant programs
- Manage DVRPC's services to a major transit-oriented redevelopment project
- Direct municipal outreach efforts to support local government implementation of the regional comprehensive plan



Amenities

Fully Equipped for Maximum Fun

Experience a memorable stay at Camp Margaritaville Resort Orange Lake, where fun and relaxation go hand in hand. Start your morning with fresh coffee from Joe Merchant's Camp Provisions before setting out on Orange Lake or spending the day at Fins Up Falls Water Park. Cruise the grounds in a golf cart, stay in shape at the Fins Up! Fitness Center, enjoy local entertainment at Six Strings stage, or let your furry friend run free at Barkaritaville Dog Park.

When it's time to indulge, sip frozen drinks at Fins Bar & Chill or grab a frozen concoction at the Tiki Bar. With live entertainment and family-friendly activities, every detail is designed to make your getaway effortless and extraordinary.



Camp Margaritaville Amenities

- Welcome Center
- Fins Up Falls Water Park
- Fins Up! Fitness Center
- Barkaritaville Dog Park
- Fins Bar & Chill
- Tiki Bar
- Dreamsicle Sugar Shop
- Joe Merchant's Camp Provisions with coffee, snacks, and Camp Margaritaville gear and souvenirs
- Arcade
- Florida Hospitality Suite (1,071 sq. ft.) for parties and events
- Golf Cart Rentals
- Bath Houses
- Laundry Facilities



Camp Margaritaville Resort Orange Lake
18365 NW 45th Avenue Rd
Citra, Florida 32113
Phone: +1 352-878-4855

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Get in the Margaritaville State of Mind

Camp Margaritaville Auburndale is a family-friendly RV and cabin oasis located in Central Florida. Situated on 66-acres located off the Polk Parkway next to Lake Myrtle in Auburndale, our resort is your all-access pass to everything Florida. From our two resort swimming pools, complete with a 147 ft. water slide (height requirement), to our 9-hole putting course and tiki bars, we offer amenities to excite the whole family. Even your furry friends are welcome! Explore the major theme parks and sparkling beaches or stay central for a sports event or festival without sacrificing any of the amenities.

Amenities

- Free Wi-Fi and Cable TV
- Upscale Bathhouse and Laundry
- Zero-entry pool with 147ft waterslide (height requirement)
- License to Chill Pool
- Jolly Mon Kids Pool
- 2 Parakeets Kids Park
- 1 Pickleball Court
- 1 Basketball Court
- Sports Island Sand Volleyball Court
- Fins Up! Fitness Center
- Pirate Ship Gem Mining
- Parrot Island Mini Golf
- Cornhole
- Joe Merchant's Camp Store
- E-Bike Rentals
- Golf Cart Rentals

Food & Beverage

- The Feeding Frenzy
- Frank & Lola's Pizzeria
- The Tiki Bar
- License to Chill Bar
- Sun Baked BBQ Hut
- Dreamsicle Ice Cream Shop

Pet Friendly

- 3 Bark-aritaville Dog Parks
- 2 Bark-aritaville Dog Spas
- Bark-aritaville Dog Run

RESORT MAP



Polk leaders hope Camp Margaritaville makes county a tourist destination

By Ken Suarez | Updated September 24, 2021 5:45pm EDT | Polk County | FOX 13 News |

Camp Margaritaville opens in Polk County

Ken Suarez reports

AUBURNDALE, Fla. - If you're longing for a little of that Margaritaville vibe, soon you won't have to drive to the Keys to get it. The Cabana Club RV Resort that just opened earlier this year is re-branding itself Camp Margaritaville joining a growing list of attractions under Jimmy Buffet's iconic banner.

"I guarantee that Jimmy Buffet fans will come here to see this property," Tom Wheary, general manager of Cabana Club, told FOX 13. "I hope that Jimmy Buffet comes here one day. We can hope. That could happen."

The resort will retain its current owners and staff, but its draw is expected to be a lot stronger because of the success of Margaritaville's laid-back, highly successful brand.

"It is going to be a game-changer for the city," said Auburndale Mayor Tim Pospichal.



RELATED [Auburndale growth explosion presents challenge for city](#)

Pospichal says he expects it to put the city on the map and area tourism officials are psyched as well.

Rather than just coming to [Polk County](#) for a day trip, they hope vacationers see the county as a destination where they can visit several attractions like Bok Tower Garden, Safari Wilderness, and [Legoland Florida](#).

"It means families are going to want to stay even longer, spend more money," offered Kris Keprios of Visit Central Florida.

The official switchover is expected to happen in early 2022.

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Polk County **News**

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News for February 12, 2026



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Camp Margaritaville Resort Seeks Zoning Changes for Public Water Park Access and 145-Foot Slide Tower



Modern Campground / January 29, 2026 @ 12:17 pm



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Developers behind Camp Margaritaville Resort Orange Lake in Citra, Florida, are pursuing zoning modifications that would allow the sale of day passes to the public at the property’s water park. The changes would also permit construction of a 145-foot slide tower, a move that could bring the region its first major water attraction since Wild Waters closed nearly a decade ago. The Marion County

Planning & Zoning Commission reviewed the request on Jan. 26, with the Marion County Board of County Commissioners scheduled to render a final decision next month. If approved, the changes would transform what was originally planned as a guest-only amenity into a potential destination for residents across Central Florida who have lacked a local water park option since Wild Waters permanently shuttered in Silver Springs State Park in September 2016.

The resort sits on approximately 150 acres along the shores of Orange Lake at 18365 NW 45th Avenue Road, positioned just off Interstate 75 in Central Florida's renowned horse country. Developer 8M Holdings, LLC is currently constructing the facility, which is expected to feature 430 RV sites, 60 cottages, a resort-style pool, lazy river, bar and restaurant, live entertainment, and a Barkaritaville dog park. The property is anticipated to welcome its first guests in early 2026, according to [Ocala-News.com](https://www.ocala-news.com/2026/01/28/new-water-park-in-marion-county-seeking-permission-to-open-to-public-construct-145-foot-slide/) (<https://www.ocala-news.com/2026/01/28/new-water-park-in-marion-county-seeking-permission-to-open-to-public-construct-145-foot-slide/>).

The zoning petition centers on modifying the property's Planned Unit Development agreement, which originally restricted water park amenities exclusively to overnight guests staying at RV sites and cottages. Under the proposed changes, the resort would gain authorization to sell day passes to local residents and visitors who are not registered overnight guests. According to county staff reports, the developer indicated that public access would likely be prioritized during off-season periods when RV occupancy typically declines, ensuring year-round utilization of the facilities.

The request reflects a broader trend among outdoor hospitality properties exploring amenity monetization as a revenue diversification strategy. Across the industry, premium amenities at RV parks and campgrounds have increasingly

functioned as independent revenue centers rather than simply perks reserved for registered guests. Capacity management has become essential when mixing overnight guests with day visitors, with guest-to-day-visitor ratios helping prevent overcrowding while protecting the experience for guests who expect amenity access as part of their stay.

Tiered pricing structures have emerged as a common approach within the industry, with properties charging premium rates during peak seasons while offering discounted day passes during slower periods. Operational considerations for properties weighing this model include increased staffing requirements for admission management, additional liability insurance coverage, enhanced maintenance schedules due to higher facility usage, and potential parking infrastructure expansion. Digital ticketing and reservation systems have made managing day visitor access increasingly practical, with online booking platforms allowing operators to set automatic capacity limits that prevent overselling while maximizing revenue potential.

Beyond public access, the zoning petition includes a request to dramatically increase the maximum allowable height for water park structures. Current zoning restricts construction to 40 feet, but 8M Holdings is seeking permission to build up to 145 feet to accommodate a planned four-slide tower complex. The developer envisions this tower as a centerpiece attraction capable of drawing visitors from throughout the region.

Height variances of this magnitude typically require applicants to demonstrate that the increased elevation serves a specific functional purpose that cannot be achieved within existing limits. Visual impact assessments, setback considerations, and compatibility with surrounding land uses commonly factor into approval decisions for such requests.

The Camp Margaritaville zoning process illustrates the multi-step approval pathway outdoor hospitality operators must navigate when modifying existing development agreements. Within PUD frameworks, modifications typically require formal review processes similar to initial approvals. Applications are often strengthened when traffic, noise, and environmental impact concerns are proactively addressed with supporting documentation rather than waiting for planning officials to raise objections.

Relationships with county commissioners and planning board members, built through regular attendance at public meetings and community events, have proven valuable when expansion requests arise. Properties considering significant amenity additions typically factor approval timeline uncertainty into project planning, as zoning reviews can extend schedules by several months and construction financing often cannot proceed until approvals are secured.

The Marion County Planning & Zoning Commission completed its review of the Camp Margaritaville request on Monday, Jan. 26. The commission's role involves evaluating the proposal and making recommendations, but ultimate authority over the zoning modifications rests with the Marion County Board of County Commissioners. That board is scheduled to vote on the proposal in February, a decision that will determine whether the resort can proceed with its expanded vision.

Marion County residents have sought a local water park destination for years following the closure of Wild Waters, which operated within Silver Springs State Park before permanently closing in September 2016. The potential approval of day pass sales at Camp Margaritaville would address that gap while providing the resort with an additional revenue stream during periods of lower overnight occupancy.

How Marion County handles this request may offer insights into how other jurisdictions approach similar petitions from outdoor hospitality properties seeking to monetize amenities originally approved for guest-only use. With 430 RV sites, 60 cottages, and a full amenity package under construction, Camp Margaritaville Resort Orange Lake is positioning itself as a significant player in Central Florida’s outdoor hospitality market. The February vote will determine whether that positioning includes becoming a regional water park destination open to visitors beyond its overnight guest population.

Advertisement

(https://moderncampground.com/mc-hospitality-highlights-january-2026/?utm_source=moderncampground&utm_medium=bottom)

Author Bio



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