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**AGENDA ITEM
ST. JOHNS COUNTY BOARD OF COUNTY COMMISSIONERS**

Deadline for Submission - Wednesday 9 a.m. – Thirteen Days Prior to BCC Meeting

5/5/2026

BCC MEETING DATE

TO: Joy Andrews, County Administrator **DATE:** April 7, 2026

FROM: Jacob Smith, AICP, Planning Division Manager **PHONE:** 904 209-0593

SUBJECT OR TITLE: ADMA26-01 Outpost at Old Moultrie Administrative Interpretation Appeal

AGENDA TYPE: Business Item, Public Hearing, Report

BACKGROUND INFORMATION:

Appeal of Administrative Interpretation Letter ADMI 2026-01 regarding whether the subject parcel constitutes a lawfully developed or previously developed commercial site, whether mobile food vendors qualify as a permitted accessory use, and whether any specific provision of the Land Development Code requires a previously developed commercial site to undergo full redevelopment or site plan approval as a prerequisite.

1. IS FUNDING REQUIRED? No **2. IF YES, INDICATE IF BUDGETED.** No

IF FUNDING IS REQUIRED, MANDATORY OMB REVIEW IS REQUIRED:

INDICATE FUNDING SOURCE:

SUGGESTED MOTION/RECOMMENDATION/ACTION:

APPROVE: Motion to approve ADMA26-1 The Outpost at Old Moultrie Road Appeal, based on two findings of fact as provided in the staff report, overturning Administrative Interpretation Letter ADMI26-1.

DENY: Motion to deny ADMA26-1 The Outpost at Old Moultrie Road Appeal, based on two findings of fact as provided in the staff report, upholding Administrative Interpretation Letter ADMI26-1.

For Administration Use Only:

Legal: Kealey West 4/23/2026

OMB: LF 4/23/2026

Admin: JDD 4/28/2026



Growth Management Department
Planning Division Report
Administrative Appeal
ADMA 26-01 Outpost at Old Moultrie Road

To: Board of County Commissioners

From: Jacob Smith, AICP, Planning Division Manager

Date: April 10, 2026

Subject: **ADMA 2026-01 Outpost at Old Moultrie Road** Appeal of Administrative Interpretation Letter ADMI 2026-01 regarding whether the subject parcel constitutes a lawfully developed or previously developed commercial site, whether mobile food vendors qualify as a permitted accessory use, and whether any specific provision of the Land Development Code requires a previously developed commercial site to undergo full redevelopment or site plan approval as a prerequisite.

Appellant: Justin Tahilramani

Representative: Jeremiah Mulligan, Esq.

Hearing Date: Board of County Commissioners – May 5, 2026

Commissioner District: District 3

APPLICATION SUMMARY

This is an Administrative Appeal of an Administrative Interpretation Letter, *ADMI 26-1 1265 2505 Old Moultrie Rd*, written by the Growth Management Department, Planning and Zoning Division on February 27, 2026. The appeal of the administrative interpretation stems from *PRIDE Case #2600700*, a complaint filed by a nearby property owner, which alleges that the subject property had “flags and signs on county right-of-way, and was setting up a food truck stand,” which was stated to be causing traffic issues along the roadway.

The St. Johns County Land Development Code (LDC) *Article 10.01.00 Interpretations Of This Code* provides that “in the event that any question arises concerning the application of regulations, performance standards, definitions, Development criteria, or any other provision of this Code, the County Administrator shall be responsible for interpretation and shall look to the Comprehensive Plan for guidance.”

The Appellant submitted a request for an administrative interpretation letter pursuant to Article 10.01.00 on February 5, 2026, seeking an interpretation of the LDC regarding whether the subject parcel constitutes a lawfully developed or previously developed commercial site, whether mobile food vendors qualify as a permitted accessory use, and whether any specific provision of the Land Development Code requires a previously developed commercial site to undergo full redevelopment or site plan approval as a prerequisite as they apply to the subject property and ongoing *PRIDE Case #2600700*.

Administrative Interpretation Letter *ADMI 26-1 2505 Old Moultrie Rd* addresses the Appellants' request for an interpretation. The following is a brief summary of the interpretation provided by the letter:

- Section 1.03.01.A of the Land Development Code (LDC) provides that no Development shall be undertaken without prior authorization pursuant to the Code. Section 1.03.02 further provides that “no Building, Structure, land or water shall hereafter be developed, used or occupied, and no Building, Structure, or part thereof shall hereafter be erected, reconstructed, moved, located, or structurally altered except in conformity with the regulations set out generally herein and for the district in which it is located.” Additionally, the LDC establishes a vested right to expand, intensify, or modify a use based solely upon the fact that a parcel was previously developed. Prior development does not exempt subsequent changes in use or intensity from compliance with current Code requirements.
- Mobile food vendors are not permitted accessory uses under Section 2.02.04.C and may not be authorized as accessory uses by implication. Their permissibility must be evaluated independently under the provisions governing mobile sales units and applicable development review requirements.
- Section 5.02.02 of the Land Development Code (LDC) provides that a Site Plan shall be required for all new Development. The LDC does not contain a categorical exemption from development review solely because property was previously developed, nor does the Land Development Code specifically differentiate ‘development’ from ‘redevelopment’; LDC regulations apply to all proposed development.

The full *ADMI 26-1* letter and the associated request letter are provided in **Attachment 3 ADMI 26-1 Letter and Original Request**.

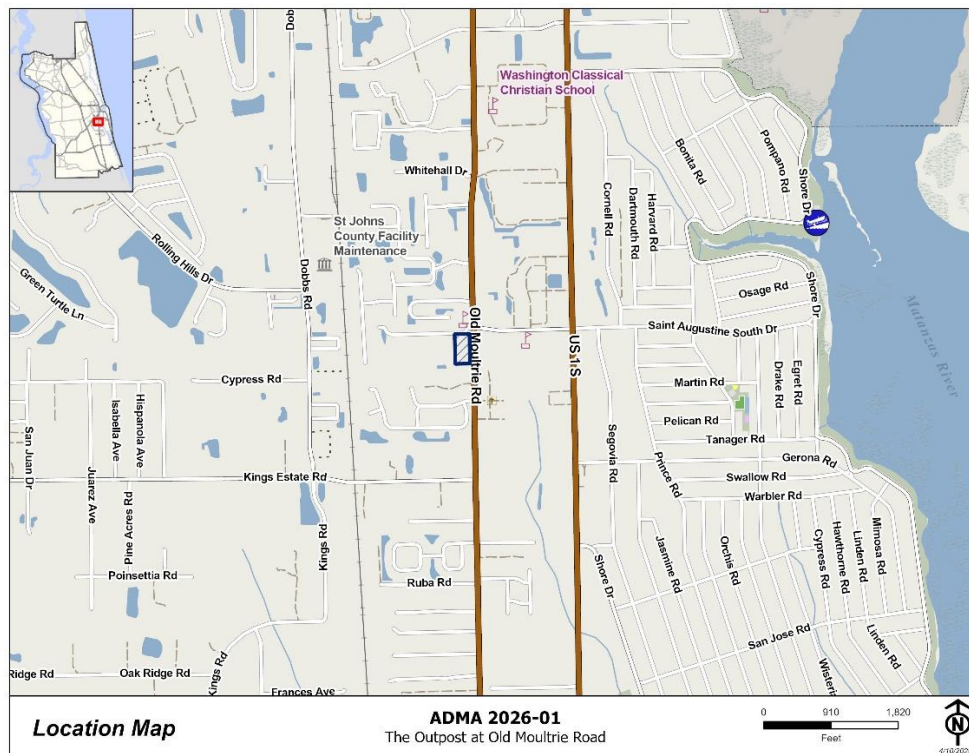
The St. Johns County LDC Article 9.07.02 provides that Appeals can be made from decisions of the County Administrator enforcing the provisions of the LDC. The Appellants filed a timely appeal on March 17, 2025.

The Appellants have provided several alleged errors in the Administrative Interpretation Letter *ADMI 26-1*; a summary of the specific errors are provided below. The Appellants' full narrative and application are provided as part of **Attachment 2 ADMA 26-1 Application and Supporting Documents**.

- Misapplication of the “Previously Developed” Standard; The interpretation concludes that the property must undergo full development review and site plan approval before accessory uses may occur, despite the property being a previously developed commercial parcel with existing site infrastructure. The interpretation that the property is now functionally equivalent to unimproved land appears inconsistent with the structure and definitions of the Land Development Code.
- LDC Section 2.04.06 allows uses that are “customarily incidental and subordinate to a permitted principal use.” The interpretation does not cite a provision that explicitly prohibits outdoor sales or mobile vendors within the Commercial Intensive zoning district, nor does it demonstrate how the proposed activity fails to meet the definition of an accessory use.
- The Administrative Interpretation states that redevelopment must proceed through development review procedures and site plan approval. While development review is required for many forms of redevelopment, the interpretation does not identify a specific Land Development Code provision requiring a previously developed commercial site to undergo full redevelopment review solely to allow an accessory use.

MAP SERIES

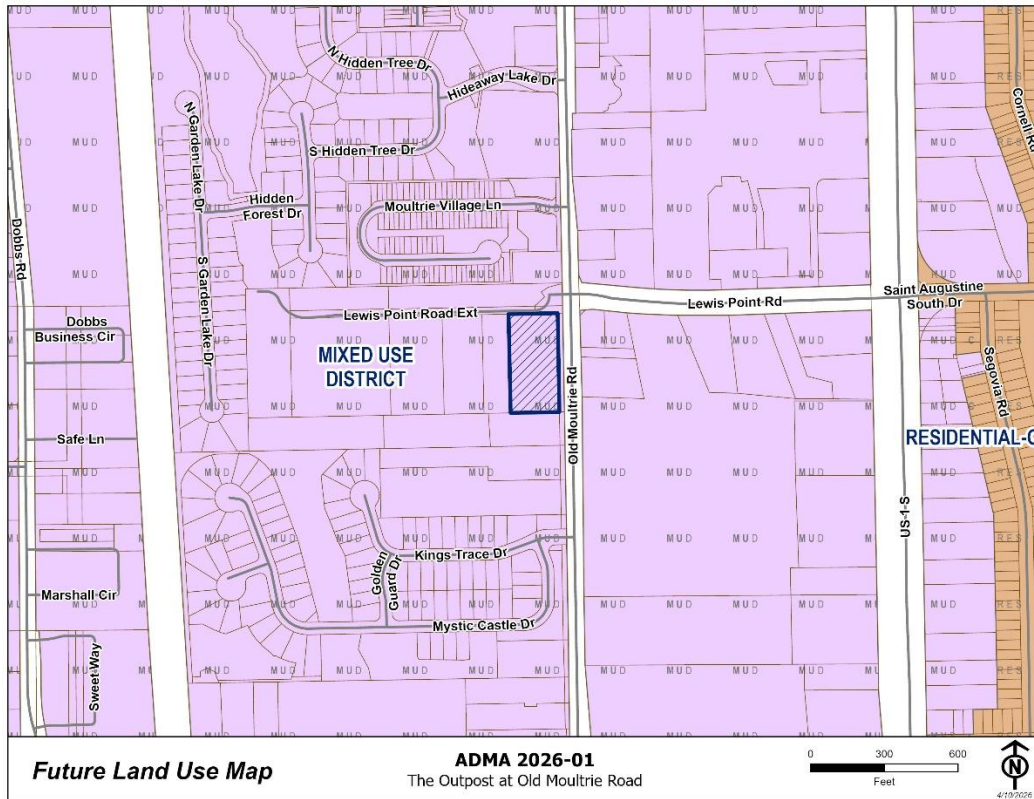
Location: The subject property is located at the southwest corner of the intersection of Old Moultrie Road and Lewis Point Road Extension.



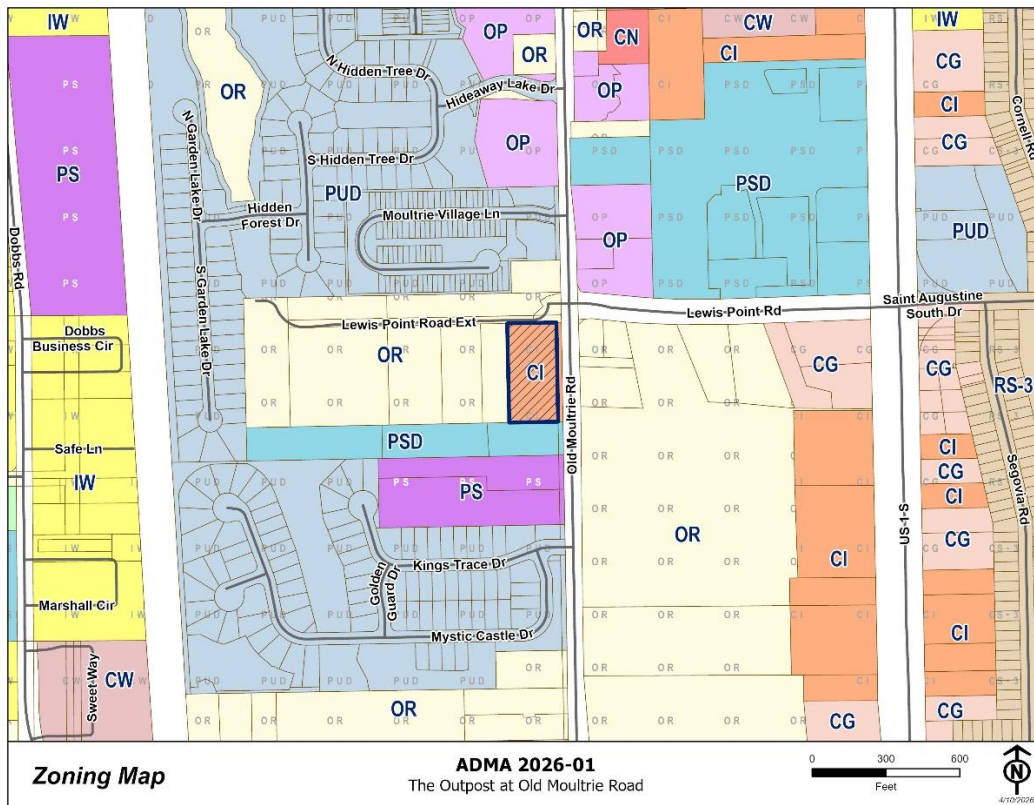
Aerial Imagery: The subject property is approximately 1.84 acres in area. The surrounding properties to the north, south, and northeast are developed with single-family homes and churches.



Future Land Use: The subject property is designated Mixed Use District on the Future Land Use Map. Surrounding properties carry the same designation.



Zoning District: The subject property is zoned Commercial Intensive (CI). Adjacent properties are zoned Open Rural (OR) to the north, west, and east, and zoned PSD to the south. The surrounding area includes a wide variety of zoning districts.



APPLICABLE LAND DEVELOPMENT CODE REGULATIONS

LDC Article 10.00.00 Generally

The purpose of this Article is to provide mechanisms for obtaining interpretations of this Code, for obtaining relief where hardship would otherwise occur, and for enforcement of this Code.

Part 10.01.00 Interpretations Of This Code

Section 10.01.01 Authority To Render

In the event that any question arises concerning the application of regulations, performance standards, definitions, Development criteria, or any other provision of this Code, the County Administrator shall be responsible for interpretation and shall look to the Comprehensive Plan for guidance. Responsibility for interpretation by the County Administrator shall be limited to standards, regulations and requirements of this Code, but shall not be construed to include interpretation of any technical codes adopted by reference in this Code, nor be construed as overriding the responsibilities given to any commission, board or official named in other sections or articles of this Code.

Sec. 9.07.01 Adversely Affected Person Defined

An “adversely affected person” as used herein shall be any person who is suffering or will suffer an adverse effect to an interest protected or furthered by the St. Johns County Comprehensive Plan, including but not limited to: interests related to health and safety; police and fire protection services; densities or intensities of development; transportation facilities; recreational facilities; educational facilities; health care facilities,

equipment, or services; and environmental or natural resources. The alleged adverse effect may be shared in common with other members of the community at large, but must exceed in degree the general interest in community good shared by all persons. A person within the area receiving mailed notice for the hearing on the matter at issue shall be automatically deemed to be an adversely affected person.

Sec. 9.07.02 Appeals From Decisions Of The County Administrator In Enforcing This Code

An Applicant or any adversely affected person may appeal any final decision of the County Administrator in enforcing this Code to the Board of County Commissioners by filing a notice of appeal with the County Administrator within thirty (30) days of the decision. The appeal shall be scheduled on the next reasonably available meeting of the Board of County Commissioners. The decision of the Board of County Commissioners shall constitute final action for the County and may, thereafter, be appealed to circuit court in accordance with Florida law.

Sec. 9.07.05 Notice of Appeal

A notice of appeal shall contain:

- A. A statement of the decision to be reviewed, and the date of the decision.
- B. A statement of the interest of the adversely affected person, as defined in Section 9.07.01, seeking review.
- C. The specific error alleged as the grounds of the appeal.

Sec. 9.07.06 Appellate Hearing

When a decision is appealed to the Planning and Zoning Agency or Board of County Commissioners, the hearing shall be a de novo hearing on the merits and shall be conducted as a quasi-judicial hearing as set forth in Part 9.06.00. Payment of fees for an Appeal shall be in accordance with the Fee Schedule adopted by Resolution by the Board of County Commissioners.

Sec. 9.07.07 Stay Of Proceedings

An appeal shall stay all administrative proceedings in furtherance of the action appealed until such time as a final determination has been made by the Planning and Zoning Agency or Board of County Commissioners on the appeal, provided that no action shall be taken by the Applicant or the administrative official during such time which should change the status of the matter being appealed.

LDC Article XII / DEFINITIONS:

Non-Conforming Use: Any preexisting Structure or use of land which is inconsistent with the provisions of this Code or any amendments thereto.

Accessory Use or Structure: A Use or Structure of a nature customarily incidental and subordinate to the principal Use or Structure, and unless otherwise provided, on the same premises.

Development Permit, Final (As it applies to Article XI of this Code): Means County approval which authorizes physical Construction for a Project which has a specific plan of Development in terms of the density, intensity, use and timing of the project. A Final Development Permit is approval of: engineered Construction

Plans, a Final Subdivision Plat; approval of a Special Use when the approval authorizes commencement of Construction; or a Building Permit for Projects not requiring platting or engineered Construction Plan approval.

Development Permit: Means any Building Permit, subdivision approval, rezoning, Special Use, Variance, or any other official action of the County having the effect of permitting the Development of land.

Clearance Guide Sheet: Means the appropriate pre-Construction Permit data sheet incorporating departmental approvals prior to issuance of a Building Permit.

Construction: Any activity which results in the modification of surface features, including but not limited to grading, land clearing, or the placement or alteration of Buildings, Structures or utilities, unless specifically exempted by this or any other applicable St. Johns County Ordinance. Hand clearing as necessary for land surveying shall not constitute Construction.

Construction Plans: Means those properly detailed and dimensioned construction drawings, plans, specifications and calculations prepared by an Engineer or other Registered Professional, as defined herein and as prepared in accordance with County and other applicable regulations, codes and standards, submitted to the County for approval of a Development Plan or Final Subdivision Plat, which sets forth the specific improvements to be made in conjunction with Development as they affect the existing site, its boundary conditions, topography, drainage, access, and associated road and other Rights-of-Way and Easements.

Developed Area: That portion of a plot or Parcel upon which a Building, Structure, paved ground surface area, gravel landscaping or other Improvements have been placed.

Development Review Process: The review and permitting process enacted by St. Johns County for the purpose of assessing the impacts of new Development or alterations to existing Development and ensuring that the Development has met applicable Federal, State and local regulations and permitting requirements.

Development: Any man-made change to improved or unimproved structure and/or real estate, including but not limited to, buildings or other structures, tanks, temporary structures, temporary or permanent storage of equipment or materials. The following activities or uses shall be taken as to involve “development” as defined in this section:

- A. Mining, dredging, filling, grading, paving, excavations, drilling operations or any other land disturbing activities.
- B. A change in the intensity of use of land, such as an increase in the number of dwelling units in a structure, or on land or a material increase in the number of dwelling units in a structure or on land.
- C. Alteration of a shore or bank of a seacoast, river, stream, lake, pond, or canal.
- D. Demolition of a structure.
- E. Clearing of land as an adjunct of construction.
- F. Any other activities referenced in Section 380.04, F.S.

DEPARTMENTAL REVIEW

The Planning and Zoning Division has routed this request to all appropriate reviewing departments.

Office of the County Attorney Review:

When a letter of interpretation issued by the County Administrator is appealed to the Board of County Commissioners, the hearing shall be a de novo hearing on the merits and shall be conducted as a quasi-judicial hearing as set forth in Part 9.06.00. Payment of fees for an Appeal shall be in accordance with the Fee Schedule adopted by Resolution by the Board of County Commissioners. The decision of the Board of County Commissioners shall constitute final action for the County.

CORRESPONDENCE/PHONE CALLS

Staff have not received any correspondence regarding this application.

ACTION

Staff offers two (2) findings of fact to support a motion to approve the appeal, overturning the interpretation of *ADMI 26-1*, and offers two (2) findings of fact to support a motion to deny the appeal, upholding the interpretation of *ADMI 26-1*. These findings may be subject to other competent substantial evidence received at the quasi-judicial public hearing.

ATTACHMENTS

1. Attachment 1 Recorded Documents Section
2. Attachment 2 ADMA 26-1 Application and Supporting Documents
3. Attachment 3 ADMI 26-1 Letter and Original Request

FINDINGS OF FACT
ADMA 2026-1 The Outpost at Old Moultrie Road

APPROVE	DENY
1. The request for Appeal has been fully considered after public hearing with legal notice duly published as required by law.	1. The request for Appeal has been fully considered after public hearing with legal notice duly published as required by law.
2. ADMI 2026-01 is not consistent with the Board of County Commissioners' interpretation of Land Development Code Sections 1.03.01.A, 1.03.02, 10.03.00, 2.02.04.C, 2.04.06, 5.02.02, 6.05.00, and 6.05.02.C, as they relate to allowable uses, nonconformities, and development standards.	2. ADMI 2026-01 is consistent with the Board of County Commissioners' interpretation of Land Development Code Sections 1.03.01.A, 1.03.02, 10.03.00, 2.02.04.C, 2.04.06, 5.02.02, 6.05.00, and 6.05.02.C, as they relate to allowable uses, nonconformities, and development standards.

ATTACHMENT 1
RECORDED DOCUMENTS SECTION

**BEGIN DOCUMENTS
TO BE RECORDED**



ORDER OF THE
ST. JOHNS COUNTY, FLORIDA
BOARD OF COUNTY COMMISSIONERS

RE: Justin Tahilramani
271 Village Grande Dr
Ponte Vedra, FL 32086

FILE NUMBER: ADMA 26-01 The Outpost at Old Moultrie Rd

LEGAL: Exhibit A

PARCEL ID: 101800-0000

DATE OF HEARING: May 5, 2026

Order APPROVING ADMA 26-01 The Outpost at Old Moultrie Rd

The request for an Administrative Appeal of the Administrative Interpretation Letter *ADMI 26-01 2505 Old Moultrie Rd*, which provided an interpretation of Land Development Code Sections 1.03.01.A, 1.03.02, 10.03.00, 2.02.04.C, 2.04.06, 5.02.02, 6.05.00, and 6.05.02.C, as they relate to allowable uses, nonconformities, and development standards, came before the St. Johns County Board of County Commissioners for a public hearing on Tuesday, May 5, 2026.

FINDINGS OF FACT

Having considered the application, along with supporting documents; the Staff Report prepared by staff; statements by the appellant; and all testimony and evidence presented during the public hearing, the Board finds as follows:

1. The request for the Appeal has been fully considered after a public hearing with legal notice duly published as required by law.
2. ADMI 2026-01 is **not** consistent with the Board of County Commissioners' interpretation of Land Development Code Sections 1.03.01.A, 1.03.02, 10.03.00, 2.02.04.C, 2.04.06, 5.02.02, 6.05.00, and 6.05.02.C, as they relate to allowable uses, nonconformities, and development standards.

NOW THEREFORE, based on the said Findings of Fact, the St. Johns County Board of County Commissioners hereby **APPROVES** the Administrative Appeal of ADMA 26-1 The Outpost at Old Moultrie Rd, and overturns the administrative interpretation of ADMI 26-1.

This decision may be appealed by filing a writ of certiorari with the Clerk of the Circuit Court of St. Johns County in accordance with the St. Johns County Land Development Code and Florida Rules of Appellate Procedure.

BOARD OF COUNTY COMMISSIONERS
OF ST. JOHNS COUNTY, FLORIDA

BY: _____
Clay Murphy, Chair

Rendition Date: _____

ATTEST: Brandon J. Patty, Clerk of the Circuit Court and Comptroller

BY: _____
Deputy Clerk



ORDER OF THE
ST. JOHNS COUNTY, FLORIDA
BOARD OF COUNTY COMMISSIONERS

RE: Justin Tahilramani
271 Village Grande Dr
Ponte Vedra, FL 32086

FILE NUMBER: ADMA 26-01 The Outpost at Old Moultrie Rd

LEGAL: Exhibit A

PARCEL ID: 101800-0000

DATE OF HEARING: May 5, 2026

Order DENYING ADMA 26-01 The Outpost at Old Moultrie Rd

The request for an Administrative Appeal of the Administrative Interpretation Letter *ADMI 26-01 2505 Old Moultrie Rd*, which provided an interpretation of Land Development Code Sections 1.03.01.A, 1.03.02, 10.03.00, 2.02.04.C, 2.04.06, 5.02.02, 6.05.00, and 6.05.02.C, as they relate to allowable uses, nonconformities, and development standards, came before the St. Johns County Board of County Commissioners for a public hearing on Tuesday, May 5, 2026.

FINDINGS OF FACT

Having considered the application, along with supporting documents; the Staff Report prepared by staff; statements by the appellant; and all testimony and evidence presented during the public hearing, the Board finds as follows:

1. The request for the Appeal has been fully considered after a public hearing with legal notice duly published as required by law.
2. ADMI 2026-01 *is* consistent with the Board of County Commissioners' interpretation of Land Development Code Sections 1.03.01.A, 1.03.02, 10.03.00, 2.02.04.C, 2.04.06, 5.02.02, 6.05.00, and 6.05.02.C, as they relate to allowable uses, nonconformities, and development standards.

NOW THEREFORE, based on the said Findings of Fact, the St. Johns County Board of County Commissioners hereby **DENIES** the Administrative Appeal of ADMA 26-1 The Outpost at Old Moultrie Rd, and upholds the administrative interpretation of ADMI 26-1.

This decision may be appealed by filing a writ of certiorari with the Clerk of the Circuit Court of St. Johns County in accordance with the St. Johns County Land Development Code and Florida Rules of Appellate Procedure.

BOARD OF COUNTY COMMISSIONERS
OF ST. JOHNS COUNTY, FLORIDA

BY: _____
Clay Murphy, Chair

Rendition Date: _____

ATTEST: Brandon J. Patty, Clerk of the Circuit Court and Comptroller

BY: _____
Deputy Clerk

Exhibit A

A parcel of land in the North half of the Northeast Quarter of the Southeast Quarter of Section 36, Township 7 South, Range 29 East, St. Johns County, Florida, and more particularly described as follows:

Commence at the intersection of the North line of said Northeast Quarter of Southeast Quarter of Section 36 with the West right of way line of State Road No. S-5A, thence South 02°26' East on said right of way line 33 feet West from and parallel to the center line of said road 77.94 feet to an angle point in said right of way, thence South 02°08' East on said right of way line 44.54 feet to the point of beginning, thence still with said right of way line South 02°08' East 402.33 feet, thence leaving said right of way and running South 87°44' West 218.25 feet thence North 02°24' West. 402.38 feet to the South side of a 30 foot easement, thence along the South line of said easement North 87°44' East 202.12 feet to the place of beginning.

Less and except the East Twenty (20) feet of the above described parcel of land as further described in Warranty Deed recorded in O.R. Book 3662, Page 1313, Public Records of St. Johns County, Florida.

Parcel Number: 1018000000

**END DOCUMENTS
TO BE RECORDED**

ATTACHMENT 2

ADMA 26-1 Application and Supporting Documents



St. Johns County Growth Management Department Application for Appeal

The Appeal must be submitted within thirty (30) days
of the date when the written final order/decision is signed and dated.

Date Appeal of a:

Project Name

Appellant's Information

Name Phone Number
Address email
City State Zip Code

Location of property that is the subject of his Appeal.


Parcel ID Number

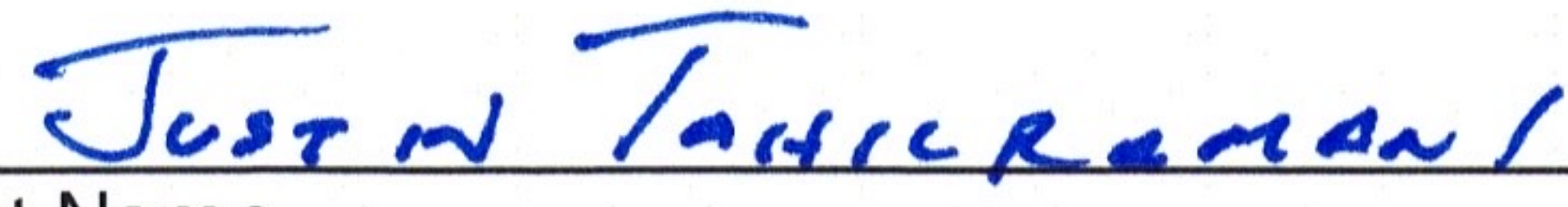
Administrative official whose decision is being appealed
may attach narrative

Specific error alleged as the grounds for the Appeal
may attach narrative

Describe what interest the person filing this Appeal has in the issue(s) being appealed.

I hereby certify that all information is correct and request an appearance before the Board of County Commissioners for Public Hearing on the above mentioned Appeal.


Signed


Print Name

Information of person to receive all correspondence regarding this application:

Name Phone Number
Address email
City State Zip Code

When a person decides to appeal a decision made by any St. Johns County Board or Committee, with respect to any matter considered at a public meeting, he may need a record of the proceedings, and for such purpose may need to ensure that a verbatim record of the proceedings is made, which record includes the testimony and evidence upon which the appeal is to be based.

Thank you for providing the Administrative Interpretation issued by the County regarding the property located at 2505 Old Moultrie Road (ADMI 2026-01).

After reviewing the interpretation and the applicable provisions of the St. Johns County Land Development Code, I respectfully submit this correspondence as a formal request to initiate an Administrative Appeal of ADMI 2026-01 to the St. Johns County Board of County Commissioners.

This request is based on the procedures historically used by the County for appeals of administrative interpretations, including the appeal processed under Administrative Appeal ADMA-2025000001, which was scheduled for hearing before the Board of County Commissioners on August 19, 2025. That matter involved an appeal of an administrative interpretation regarding agricultural uses and development standards and was processed through the County's administrative appeal mechanism prior to the applicant's withdrawal.

The existence of that appeal demonstrates that administrative interpretations issued by the County Administrator may be appealed through the County's administrative appeal process to the Board of County Commissioners (see attached).

Accordingly, I respectfully request that ADMI 2026-01 be processed in the same manner and scheduled for consideration by the Board of County Commissioners.

Basis for Appeal:

The appeal is based on several substantive and procedural issues within the interpretation itself.

1. Misapplication of the "Previously Developed" Standard

The interpretation concludes that the property must undergo full development review and site plan approval before accessory uses may occur, despite the property being a previously developed commercial parcel with existing site infrastructure.

The Land Development Code defines development to include demolition, land disturbance, and changes in intensity of use. However, the Code does not

contain language stating that demolition of a structure alone converts a previously developed commercial property into “unimproved property.”

The subject parcel:

- historically contained a commercial structure
- retains site infrastructure including parking and utilities
- received a demolition permit from the County

Because of this, the interpretation that the property is now functionally equivalent to unimproved land appears inconsistent with the structure and definitions of the Land Development Code.

2. Interpretation of Accessory Uses Under LDC §2.04.06

The interpretation concludes that mobile food vendors **are not permitted** accessory uses on the property.

However, LDC §2.04.06 allows uses that are “*customarily incidental and subordinate to a permitted principal use.*”

The interpretation does not cite a provision that explicitly prohibits outdoor sales or mobile vendors within the Commercial Intensive zoning district, nor does it demonstrate how the proposed activity fails to meet the definition of an accessory use.

The appeal therefore requests review of whether the interpretation correctly applies the accessory use provisions of the Code.

3. Lack of a Specific Code Provision Requiring Full Redevelopment Review

The Administrative Interpretation states that redevelopment must proceed through development review procedures and site plan approval.

While development review is required for many forms of redevelopment, the interpretation does not identify a specific Land Development Code provision requiring a previously developed commercial site to undergo full redevelopment review solely to allow an accessory use.

The appeal therefore seeks clarification regarding the specific code provision relied upon for that determination.

4. Procedural and Reliance Concerns

Prior to demolition of the existing structure:

- the project concept was discussed with County staff in multiple pre-development meetings, and
- the County subsequently issued a demolition permit for the structure.

Because demolition occurred with the County's knowledge of the redevelopment process, the subsequent interpretation significantly alters the regulatory posture of the site after those actions were taken.

This issue warrants review by the Board of County Commissioners to ensure the interpretation is consistent with both the Code and the County's established administrative practices.

Request

Based on the above, I respectfully request that:

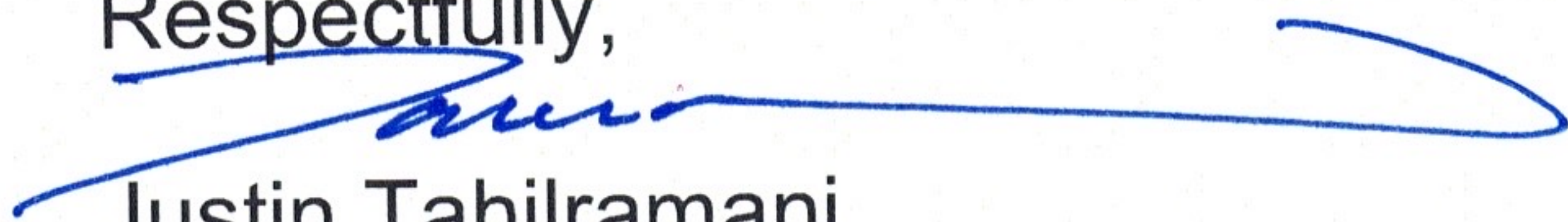
1. This correspondence be accepted as a formal request for Administrative Appeal of ADMI 2026-01.
2. The appeal be processed through the County's established administrative appeal procedure consistent with ADMA-2025000001.
3. The matter be scheduled for consideration by the St. Johns County Board of County Commissioners.

Please let me know the required application materials, filing procedures, or administrative forms necessary to initiate the appeal.

Nothing in this request should be construed as a waiver of any rights available under the St. Johns County Land Development Code, Florida law, or other administrative or judicial remedies.

Thank you for your time and assistance.

Respectfully,



Justin Tahilramani
Managing Member
The Outpost SJC, LLC
2505 Old Moultrie Road
St. Augustine, FL

Thank you for providing the Administrative Interpretation issued by the County regarding the property located at 2505 Old Moultrie Road (ADMI 2026-01).

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The appeal therefore requests review of whether the interpretation correctly applies the accessory use provisions of the Code.

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The Administrative Interpretation states that redevelopment must proceed through development review procedures and site plan approval.

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Thank you for your time and assistance.

Respectfully,

Justin Tahilramani
Managing Member
The Outpost SJC, LLC
2505 Old Moultrie Road
St. Augustine, FL

ATTACHMENT 3

**ADMI 26-1 Letter and
Original Request**



St. Johns County Board of County Commissioners

Growth Management Department

February 27, 2026

Justin Tahilramani
271 Village Grande Drive
Ponte Vedra, FL, 32081
hello@theoutpostsjc.com

RE: ADMI 2026-01: Administrative Interpretation of development standards applicable to mobile food vendors on a previously developed site, mobile food vendors as an accessory use, and prerequisites for development.

**2505 Old Moultrie Road
St Augustine, FL 32086
Parcel # 101800-0000**

Mr. Tahilramani,

Pursuant to Article X of the St. Johns County Land Development Code (“LDC”), and specifically §§10.01.01 and 10.01.02, this letter constitutes the County Administrator’s formal written interpretation in response to your Request for Interpretation dated January 31, 2026.

Your letter seeks clarification regarding:

1. Whether the subject parcel constitutes a lawfully developed or previously developed commercial site notwithstanding the age of the original development, a temporary period of vacancy, or demolition undertaken in furtherance of planned redevelopment.
2. Whether mobile food vendors qualify as permitted accessory use under LDC § 2.04.06 when operation on a previously developed commercial parcel.
3. Whether any provision of the LDC requires a previously developed commercial site to undergo full redevelopment or Site Plan approval as a prerequisite to allow such use.

After reviewing the submitted materials and applicable provisions of the Land Development Code, provided below for reference, the following interpretation is issued.

I. Scope of Administrative Interpretation Authority

Section 10.01.01 authorizes the County Administrator to interpret the application of the Code where questions are concerning regulatory provisions. However, such interpretation is limited to clarifying how existing Code provisions apply to a given set of facts. It does not create new rights, grant exemptions from development standards or determine vested rights. This response is strictly limited to interpreting the relevant St. Johns County Land Development Code.

II. Status of the Property as Developed or Previously Developed

The Land Development Code does not define the phrase “lawfully developed or previously developed commercial site”. Accordingly, interpretation must be grounded in the operative provisions of the Code.

Section 1.03.01.A of the LCD provides that no Development shall be undertaken without prior authorization pursuant to the Code. Section 1.03.02 further provides that “no Building, Structure, land or water shall hereafter be developed, used or occupied, and no Building, Structure, or part thereof shall hereafter be erected, reconstructed, moved, located,

or structurally altered except in conformity with the regulations set out generally herein and for the district in which it is located.”

Article XII defines “Development” broadly to include any man-made change to real property, including demolition of a structure and changes in intensity of use. Demolition is therefore expressly classified as Development under the Code. Where a principal structure has been demolished, that demolition constitutes Development and alters the regulatory posture of the site. The removal of a principal commercial structure eliminates the structural component supporting any subordinate or accessory activity.

Additionally, Part 10.03.00 provides standards for non-conforming site conditions. Specifically, the code describes nonconformities as “within the districts established by this Code, there exist Lots, Structures, Uses of land or water and characteristics of Use which were lawful before the adoption of this Code, but which would be prohibited, regulated, or restricted under the terms of this Code or future amendments” and further provides that such “nonconformities shall not be enlarged upon, expanded, intensified, nor be used as grounds for adding other Structures or Uses prohibited elsewhere in the same district”, and that “a Nonconforming Use of a structure and land or water in combination shall not be extended or enlarged after the adoption of this Code” except in conformity to the regulations of the code.

a. The LDC does not specifically identify the age of an original development, only identifying that “Lots, Structures, Uses of land or water, and characteristics of Use which were lawful before the adoption of this Code, but which would be prohibited, regulated, or restricted under the terms of this Code or future amendments.”

b/c. The LDC provides that “No Building or portion thereof used in whole or part for a Nonconforming Use, which remains idle or unused for a continuous period of one (1) full calendar year, whether or not the equipment or fixtures are removed, shall be used again except in conformity with the regulations of this Code.”

Nothing in the LDC establishes a vested right to expand, intensify, or modify a use based solely upon the fact that a parcel was previously developed. Prior development does not exempt subsequent changes in use or intensity from compliance with current Code requirements.

III. Whether Mobile Food Vendors Qualify as an Accessory Use

Section 2.02.04.C lists permitted accessory uses within commercial districts. Mobile sales units are not listed among those permitted accessory uses.

Section 2.04.06 separately regulates Mobile Sales Units within the Prohibited Uses section and provides that mobile sales units shall not be located on unimproved property except as otherwise provided under temporary use regulations. The LDC defines “Accessory Use or Structure” as a use customarily incidental and subordinate to a principal use and located on the same premises. Thus, an accessory use must be subordinate to an existing lawful principal use and where the Code separately regulates a use and does not list it as a permitted accessory use, it cannot be treated as an accessory use by implication.

Where demolition has occurred and no lawful principal commercial structure is present, a mobile food vendor would operate as a stand-alone commercial activity. In that circumstance, the accessory use is not incidental or subordinate to a principal use, but instead functions as the principal use of the property.

Accordingly, mobile food vendors are not permitted accessory uses under Section 2.02.04.C and may not be authorized as accessory uses by implication. Their permissibility must be evaluated independently under the provisions governing mobile sales units and applicable development review requirements.

IV. Site Plan and Development Review Requirements

Section 5.02.02 provides that a Site Plan shall be required for all new Development.

Article XII defines “Development” to include to include demolition of a structure, land disturbance, and changes in intensity of use of land.

Section 5.02.01 provides that, the purpose of Site Plan review and approval is because “Construction activity upon the land is an element in the process of community Development. Such activity impacts public utilities, facilities, Roadways and adjacent land and their use. Therefore, in the interest of the public health, safety and welfare, it is necessary that these activities be carried out in a proper and orderly fashion and in accordance with St. Johns County standards.” The Code does not require full redevelopment merely because of age or temporary vacancy. However, if the proposed activity constitutes new development or a change in use or intensity, development review under Part 5.02 is required.

Per LDC 5.02.01.B “The purpose of the Site Plan regulations is to establish procedures and standards for the review of Construction activities and site Development, except for single-family and Two Family Dwellings (duplexes) residential Development on Lots of Record, existing on the effective date of this Code, in order to ensure the following:

1. Provision of efficient and effective review, determination, and compliance procedures.
2. Prevention of Flooding within Developments by ensuring adequate Flood control and drainage facilities
3. Traffic hazards are minimized, and traffic flow is enhanced, including pedestrian traffic.
4. Developments are compatible with the sites as well as adjacent Uses.
5. Developments are responsive to the environment and protection of Environmentally Sensitive Areas.
6. Availability and type of water and wastewater utilities serving the sites.
7. Developments have adequate fire protection.
8. Compliance with Chapter 163, F.S., and the St. Johns County Comprehensive Plan.”

Section 5.02.02 provides that all new development requires site plan approval and review:

Sec. 5.02.02 General Requirements

- A. A Site Plan shall be required for all new Development to further assist the County Administrator in assuring that Development shall be in compliance with all applicable ordinances, regulations and resolutions of this County.
- B. All Development reviewed under the Site Plan regulations shall comply with the densities and intensities and other provisions established within the St. Johns County Comprehensive Plan, unless otherwise excepted therein.
- C. All Development shall meet or exceed the requirements of all Land Development Regulations as established and adopted by St. Johns County, the State of Florida and the federal government unless such requirements have been waived by those governments.
- D. The approval of a Site Plan and the issuance of a Development Order are required by St. Johns County before Building Permits may be issued for Construction.

Additionally, standards applicable to parking and loading, as provided in Part 6.05.00 LDC informs us that, “in all districts, in connection with every industrial, commercial, institutional, residential or any other use, there shall be provided, at the time any new Structure is erected, any use of a Structure or land is enlarged or increased in Density or Intensity or any other Use or change of Use established, Off-Street Parking Spaces for automobiles in accordance with requirements contained in this Part.”

LDC 6.05.02.C further clarifies that ‘Compliance With Regulations’ is the standard for all sites which change or intensify uses: “The requirements for Off-Street Parking Space and Off-Street Loading Space applicable to newly erected or substantially altered Structures, or changes in Use shall be a continuing obligation of the Owner of the real estate upon which any such Structure is located, so long as the Structure is in existence and its Use requiring parking

or loading, or both, continues. It shall be unlawful for an Owner of any Structures affected by this Code to discontinue, change or dispense with, or cause the discontinuance or change of the required Vehicle Parking or loading space apart from the discontinuance of such Structure, without establishing alternative parking and loading space which meets the requirements of and is in compliance with this Code.”

The LDC does not contain a categorical exemption from development review solely because property was previously developed, nor does the Land Development Code specifically differentiate ‘development’ from ‘redevelopment’; LDC regulations apply to all proposed development.

V. Conclusion

Based on the foregoing, use or development of the property must proceed in accordance with applicable requirements of the Land Development Code, including required development review procedures and site plan approval.

If you have any questions, please contact Jacob Smith, Planning Manager.

Sincerely,



Joy Andrews
County Administrator

Receipt: 26-008474

Attachment 1: LDC Reference and Definitions

Attachment 2: Letter of Request

LDC REFERENCES AND DEFINITIONS

PART 1.03.00 INTERPRETATION AND REGULATORY EFFECT

Sec. 1.03.01 Area Where Code Applies

A. Except as specifically stated in this Code, the regulations of this Code shall apply throughout the unincorporated portions of St. Johns County. No Development shall be undertaken without prior authorization pursuant to this Code.

Sec. 1.03.02 Prohibitions

A. No Building, Structure, land or water shall hereafter be developed, used or occupied, and no Building, Structure, or part thereof shall hereafter be erected, reconstructed, moved, located, or structurally altered except in conformity with the regulations set out generally herein and for the district in which it is located. In clarification of the foregoing, it is the specific intent of the Board of County Commissioners that all floating Structures, excluding docks and boats, and Buildings, as well as Development, Buildings and Structures built over or in water, shall meet all the requirements of this Code and other codes and regulations of St. Johns County.

PART 10.03.00 NONCONFORMING LOTS, USES AND STRUCTURES

Sec. 10.03.01 Intent

Within the districts established by this Code, there exist Lots, Structures, Uses of land or water and characteristics of Use which were lawful before the adoption of this Code, but which would be prohibited, regulated, or restricted under the terms of this Code or future amendments. It is the intent of this Code to permit these non-conformities to continue until they are removed, but not to encourage their survival. It is, further, the intent of this Code that such nonconformities shall not be enlarged upon, expanded, intensified, nor be used as grounds for adding other Structures or Uses prohibited elsewhere in the same district. It is, further, the intent of this Code that changes in nonconformities other than their discontinuance shall be discouraged. This provision does not apply to non-conforming Signs, which are governed by Part 7.09.00 of this Code.

Sec. 10.03.02 Rules Applicable to Nonconformities (in part)

A. Enlargement and Incompatibility

Nonconforming Uses are declared by this Code to be incompatible with permitted Uses in the districts involved. A Nonconforming Use of a Structure, a Nonconforming Use of a structure and land or water in combination shall not be extended or enlarged after the adoption of this Code.

C. Nonconforming Use of Open Land

Where open land (i.e., land not enclosed by Buildings) is being used for Nonconforming Use, such Nonconforming Use shall not be extended or enlarged either on the same or adjoining property.

E. Discontinuance of Nonconforming Uses

No Building or portion thereof used in whole or part for a Nonconforming Use, which remains idle or unused for a continuous period of one (1) full calendar year, whether or not the equipment or fixtures are removed, shall be used again except in conformity with the regulations of this Code.

L. All existing nonconformities shall continue to be nonconforming and subject to limitations of this Part unless such nonconformities are made conforming by another Part of this Code or by the granting of a Special Use or Variance.

PART 2.04.00 PROHIBITED USES

The following Uses are either totally prohibited or they are prohibited in the designated areas mentioned in each separate Section:

Sec. 2.04.06 Mobile Sales Units On Un-improved Property

Mobile sales units shall not be located on un-improved property nor shall such unit be located St. Johns County Land Development Code II-92 January 12, 2026 within any zoning district not allowing outside sales activities, except as provided in a temporary Use as defined in Section 2.02.05 of this Code.

2.02.04.C Permitted Accessory Uses, Office, Commercial and Planned Districts

1. Off street parking, loading meeting requirements of Section 6.05.02 of this Code.
2. Single family dwelling or two (2) family dwelling only for occupancy by owners or employees thereof. The Use of a Manufactured/Mobile Home for this purpose shall be considered as Special Use, if allowed in the districts, as defined in Part 2.03.00, and shall be considered in accordance with the requirements of Section 6.05.02 of this Code.
3. Air conditioning compressors or other equipment designed to serve the main Use Structure, including waste dumpster pad and containers, provided it is not located less than seven (7) feet from the property line.
4. Fences, wall or hedges may be allowed along the edge of any required Yard, provided that no fence, wall or hedge in excess of four (4) feet shall be allowed within twenty-five (25) feet of the front property line, nor obstructs the view of approaching traffic in each direction, except within the visibility triangle at roadway intersections as described in Part 6.04.00 Roadway, Drainage & Utilities Standards.
5. Dogs may be allowed in designated outdoor portions of public food service establishments or restaurant as an accessory use subject to Section 5.09.233, Florida Statutes

PART 5.02.00 SITE PLAN

Sec. 5.02.01 Purpose

- A. Construction activity upon the land is an element in the process of community Development. Such activity impacts public utilities, facilities, Roadways and adjacent land and their use. Therefore, in the interest of the public health, safety and welfare, it is necessary that these activities be carried out in a proper and orderly fashion and in accordance with St. Johns County standards.
- B. The purpose of the Site Plan regulations is to establish procedures and standards for the review of Construction activities and site Development, except for Single Family and Two Family Dwellings (duplexes) residential Development on Lots of Record, existing on the effective date of this Code, in order to ensure the following:
 1. Provision of efficient and effective review, determination and compliance procedures.
 2. Prevention of Flooding within Developments by ensuring adequate Flood control and drainage facilities are provided.
 3. Traffic hazards are minimized and traffic flow is enhanced, including pedestrian traffic.
 4. Developments are compatible with the sites as well as adjacent Uses.
 5. Developments are responsive to the environment and protection of Environmentally Sensitive Areas.
 6. Availability and type of water and wastewater utilities serving the sites.
 7. Developments have adequate fire protection.
 8. Compliance with Chapter 163, F.S., and the St. Johns County Comprehensive Plan.

Sec. 5.02.02 General Requirements

- A. A Site Plan shall be required for all new Development to further assist the County Administrator in assuring that Development shall be in compliance with all applicable ordinances, regulations and resolutions of this County.
- B. All Development reviewed under the Site Plan regulations shall comply with the densities and intensities and other provisions established within the St. Johns County Comprehensive Plan;
- C. All Development shall meet or exceed the requirements of all Land Development Regulations as established and adopted by St. Johns County, the State of Florida and the federal government unless such requirements have been waived by those governments.
- D. The approval of a Site Plan and the issuance of a Development Order are required by St. Johns County before Building Permits may be issued for Construction

PART 6.05.00 PARKING AND LOADING STANDARDS

Sec. 6.05.02 Parking and Loading Standards

- A. Off-Street Parking Required

In all districts, in connection with every industrial, commercial, institutional, residential or any other use, there shall be provided, at the time any new Structure is erected, any use of a Structure or land is enlarged or increased in Density or Intensity or any other Use or change of Use established, Off-Street Parking Spaces for automobiles in accordance with requirements contained in this Part.

- C. Compliance With Regulations

The requirements for Off-Street Parking Space and Off-Street Loading Space applicable to newly erected or substantially altered Structures, or changes in Use shall be a continuing obligation of the Owner of the real estate upon which any such Structure is located, so long as the Structure is in existence and its Use requiring parking or loading, or both, continues. It shall be unlawful for an Owner of any Structures affected by this Code to discontinue, change or dispense with, or cause the discontinuance or change of the required Vehicle Parking or loading space apart from the discontinuance of such Structure, without establishing alternative parking and loading space which meets the requirements of and is in compliance with this Code.

- H. Parking Area Design Standards (in part)

1. Except for Single Family and Two Family Dwellings, non-commercial boat docks and piers Agricultural and Related Uses, and those Uses listed under Section 6.08.42, every off-street Parking Area and Vehicular Use Area shall be surfaced with asphaltic or portland cement binder pavement or an equivalent Improvement, so as to provide a durable and dustless surface with adequate drainage and Stormwater management provisions as required by Section 6.04.06, unless a Special Use Permit has been approved, pursuant to Section 2.03.15 of this Code.

LDC Article XII / DEFINITIONS:

Non-Conforming Use: Any preexisting Structure or use of land which is inconsistent with the provisions of this Code or any amendments thereto.

Accessory Use or Structure: A Use or Structure of a nature customarily incidental and subordinate to the principal Use or Structure, and unless otherwise provided, on the same premises.

Development Permit, Final (As it applies to Article XI of this Code): Means County approval which authorizes physical Construction for a Project which has a specific plan of Development in terms of the density, intensity, use and timing of the project. A Final Development Permit is approval of: engineered Construction Plans, a Final Subdivision Plat; approval of a Special Use when the approval authorizes commencement of Construction; or a Building Permit for Projects not requiring platting or engineered Construction Plan approval.

Development Permit: Means any Building Permit, subdivision approval, rezoning, Special Use, Variance, or any other official action of the County having the effect of permitting the Development of land.

Clearance Guide Sheet: Means the appropriate pre-Construction Permit data sheet incorporating departmental approvals prior to issuance of a Building Permit.

Construction: Any activity which results in the modification of surface features, including but not limited to grading, land clearing, or the placement or alteration of Buildings, Structures or utilities, unless specifically exempted by this or any other applicable St. Johns County Ordinance. Hand clearing as necessary for land surveying shall not constitute Construction.

Construction Plans: Means those properly detailed and dimensioned construction drawings, plans, specifications and calculations prepared by an Engineer or other Registered Professional, as defined herein and as prepared in accordance with County and other applicable regulations, codes and standards, submitted to the County for approval of a Development Plan or Final Subdivision Plat, which sets forth the specific improvements to be made in conjunction with Development as they affect the existing site, its boundary conditions, topography, drainage, access, and associated road and other Rights-of-Way and Easements.

Developed Area: That portion of a plot or Parcel upon which a Building, Structure, paved ground surface area, gravel landscaping or other Improvements have been placed.

Development Review Process: The review and permitting process enacted by St. Johns County for the purpose of assessing the impacts of new Development or alterations to existing Development and ensuring that the Development has met applicable Federal, State and local regulations and permitting requirements.

Development: Any man-made change to improved or unimproved structure and/or real estate, including but not limited to, buildings or other structures, tanks, temporary structures, temporary or permanent storage of equipment or materials. The following activities or uses shall be taken as to involve "development" as defined in this section:

- A. Mining, dredging, filling, grading, paving, excavations, drilling operations or any other land disturbing activities.
 - B. A change in the intensity of use of land, such as an increase in the number of dwelling units in a structure, or on land or a material increase in the number of dwelling units in a structure or on land.
 - C. Alteration of a shore or bank of a seacoast, river, stream, lake, pond, or canal.
 - D. Demolition of a structure.
 - E. Clearing of land as an adjunct of construction.
 - F. Any other activities referenced in Section 380.04, F.S.
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ARTICLE X – REQUEST FOR INTERPRETATION

St. Johns County Land Development Code (Unified Development Ordinance)

REQUESTOR

Justin Tahilramani
Managing Member
The Outpost SJC, LLC

PROPERTY INFORMATION

Address:
2505 Old Moultrie Road
St. Augustine, Florida

Zoning:
Commercial (existing zoning classification)

Description:
Previously developed commercial parcel with existing site infrastructure

AUTHORITY FOR REQUEST

This request is submitted pursuant to **Article X – Interpretations, Equitable Relief, and Enforcement** of the St. Johns County Land Development Code (“LDC”).

Specifically:

LDC § 10.01.01 – Authority to Render provides, in relevant part:

“In the event that any question arises concerning the application of regulations, performance standards, definitions, development criteria, or any other provision of this Code, the County Administrator shall be responsible for interpretation...”

LDC § 10.01.02 – Procedures further provides:

“After a complete application and required fee have been received, the County Administrator shall issue a letter of interpretation within ten (10) working days of receipt of the complete application.”

This filing constitutes a formal request for interpretation under the above authority.

QUESTION PRESENTED

Whether a previously developed, commercially zoned parcel that retains established site infrastructure may allow mobile food vendors as an accessory use pursuant to **LDC § 2.04.06 (Accessory Uses)** without being required to undergo full redevelopment or site plan approval, notwithstanding the age of development, a temporary period of vacancy, or demolition undertaken in furtherance of planned redevelopment.

FACTUAL BACKGROUND:

1. The subject property is a **commercially zoned parcel that was lawfully developed and used for commercial purposes for many years**, including a principal commercial structure, paved access, curb cuts, parking, and public utilities.
2. The property retained **established curb cuts, vehicular access, public water and power, and commercial development lineage**, and was not reverted to raw or undeveloped land at any time.
3. Following acquisition, the Owner proposed **interim commercial operations**, including mobile food vendors operating as an **accessory use**, while planning a phased redevelopment of the site.
4. Beginning approximately **five (5) months prior to this filing**, County Planning staff asserted that:
 - the property was no longer considered “improved” due to the age of development and a period of vacancy; and
 - allowing mobile food vendors would require the property to undergo **full development review and approval**.
5. During this period:
 - no formal written zoning or land-use determination was issued by the County;
 - no specific Land Development Code section was cited requiring full redevelopment or site plan approval as a prerequisite to an accessory use; and
 - the Owner was **not informed of the Article X interpretation process**, despite the existence of a bona fide dispute concerning the application of the Code.
6. Instead, the Owner was advised that mobile food vendors must be removed or the matter would be referred for enforcement under **Chapter 162, Florida Statutes**, including appearance before a Code Enforcement Special Magistrate.

7. As part of a planned redevelopment, the Owner is now proceeding with **demolition of the existing principal structure**. Demolition is occurring **after extended County delay and without the benefit of a timely Article X interpretation**, notwithstanding the continued presence of site infrastructure and the property's prior commercial development status.

APPLICABLE CODE PROVISIONS

LDC § 2.04.06 – Accessory Uses

Allows uses that are *customarily incidental and subordinate* to a permitted principal use, unless expressly prohibited elsewhere in the Code.

LDC Article X – Interpretations, Equitable Relief, and Enforcement

Establishes that interpretation authority rests with the County Administrator and provides a mandatory administrative process for resolving disputes regarding application of the Land Development Code.

No provision of the Land Development Code has been identified that requires a previously developed commercial parcel to undergo full redevelopment or site plan approval **solely as a condition precedent** to allowing an accessory use.

INTERPRETATION REQUESTED

The Owner respectfully requests a written interpretation addressing the following:

1. Whether the subject parcel constitutes a **lawfully developed or previously developed commercial site** under the Land Development Code, notwithstanding:
 - the age of original development;
 - a temporary period of vacancy; or
 - demolition undertaken in furtherance of planned redevelopment.
2. Whether **mobile food vendors qualify as a permitted accessory use** under **LDC § 2.04.06** when operating on a previously developed commercial parcel.
3. Whether any **specific provision of the Land Development Code** requires a previously developed commercial site to undergo full redevelopment or site plan approval **as a prerequisite** to allowing an accessory use, and if so, identification of that provision.

RELIEF REQUESTED

Pursuant to **LDC § 10.01.02**, the Owner respectfully requests:

1. Issuance of a **formal written Letter of Interpretation** by the County Administrator within ten (10) working days of receipt; and
2. That enforcement action related to the subject interpretation be **held in abeyance** pending issuance of the County Administrator's interpretation.

PRESERVATION OF RIGHTS

This request is submitted to preserve all rights under the Land Development Code and Florida law, including but not limited to rights related to vested development status, nonconforming development standards, due process, equitable relief, and administrative and judicial appeal.

Nothing herein shall be construed as an admission of any violation.

Submitted by:

Justin Tahilramani

Justin Tahilramani

Justin Tahilramani (Jan 31, 2026 18:10:25 EST)

Managing Member
The Outpost SJC, LLC

Article X

Final Audit Report

2026-01-31

Created:	2026-01-31
By:	Justin Tahilramani (justin@sandhillsREH.com)
Status:	Signed
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-  Document created by Justin Tahilramani (justin@sandhillsREH.com)
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