1	**AGENDA ITEM** **ST. JOHNS COUNTY BOARD OF COUNTY COMMISSIONERS**
	Deadline for Submission - Wednesday 9 a.m. – Thirteen Days Prior to BCC Meeting

11/3/2026

BCC MEETING DATE

TO: **Joy Andrews, County Administrator** **DATE:** **October 21, 2026**

FROM: **Patrick Heekin, Planner** **PHONE:** **904 209-0669**

SUBJECT OR TITLE: **Public Hearing continued from October 20, 2026 - ENCERT 2026-12 Star IV**

AGENDA TYPE: **Business Item, Public Hearing, Report**

BACKGROUND INFORMATION:

Application for Agricultural Enclave Certification pursuant to Sections 163.3162 and 163.3164, Chapter 2026-34, Laws of Florida. This certification request is identified as ENCERT 2026-12 Agricultural Enclave Certification (Star IV) and includes approximately 70.83 acres. The subject property is located West of State Road 16, south of the Grand Oaks development, and north of the Windward Ranch development.

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 Agricultural Enclave Certification Application ENCERT 2026-12 upon finding that, based upon the competent substantial evidence contained in the record, the application demonstrates that the subject parcels satisfy the statutory definition of an agricultural enclave contained in Section 163.3164(4), Florida Statutes, and the certification requirements of Section 163.3162(4)(a), Florida Statutes.

DENY:Motion to DENY Agricultural Enclave Certification Application ENCERT 2026-12, finding that, based upon the competent substantial evidence contained in the record, the subject parcel(s) do not satisfy the statutory definition of an agricultural enclave under Section 163.3164(4), Florida Statutes, and the requirements for certification under Section 163.3162(4), Florida Statutes;

and direct the Office of the County Attorney to prepare the final written order, including Findings of Fact and Conclusions of Law supporting the Board's determination, as required by Section 163.3162(4), Florida Statutes.

For Administration Use Only:
Legal: Jalisa Ferguson 10/26/2026 **OMB: ARM 10/26/2026** **Admin: JDD 10/26/2026**

Growth Management Department
Planning Division Report
Application for an Agricultural Enclave Certification
ENCERT 2026-12 Star IV Investments

To:	Board of County Commissioners
From:	Patrick Heekin, Planner
Date:	October 26, 2026
Subject:	**ENCERT 2026-12 Star IV Investments,** a request to certify PARCEL ID# 029340-0000, approximately 70.83 acres, as an Agricultural Enclave per Florida Statute Section 163.3162(4) and 163.3164(4).
Applicants:	Casey Dendor, AICP – England-Thims & Miller
Owner:	Star Investors IV Limited, LLLP
Hearing Dates:	Board of County Commissioners – October 20, 2026 Board of County Commissioners – November 3, 2026 (*continued*)
Commissioner District:	District 2

SUMMARY:

The 2026 amendments to Sections 163.3162 and 163.3164, Florida Statutes establish a process allowing property owners to request certification that a property qualifies as an Agricultural Enclave before submitting a development application. Within thirty (30) days after receipt of an application, the local government is required to provide the applicant with a written report evaluating whether the application complies with the statutory requirements. The Board of County Commissioners must thereafter conduct a public hearing to determine whether the application satisfies the statutory definition of an agricultural enclave contained in Section 163.3164(4), Florida Statutes, and the certification requirements of Section 163.3162(4)(a), Florida Statutes.

The applicant is seeking certification of an Agricultural Enclave located at Parcel ID# 029340-0000. The property is approximately 70.83 acres and is located West of State Road 16, south of the Grand Oaks development, and north of the Windward Ranch development.

County staff reviewed the application materials submitted by the Applicant together with information independently verified by County staff and prepared the written report required by Section 163.3162(4)(a), Florida Statutes.

Based upon the application materials submitted and staff's independent review, the application does not appear to demonstrate that the subject parcels satisfy the statutory definition of an agricultural enclave contained in Section 163.3164(4), Florida Statutes, and the certification requirements of Section 163.3162(4)(a), Florida Statutes. The detailed analysis supporting staff's preliminary evaluation is contained in the Agricultural Enclave Certification Report prepared pursuant to Section 163.3162(4)(a), Florida Statutes, which is attached as Attachment 1 and incorporated herein by reference.

BOARD DETERMINATION

Pursuant to Sections 163.3162 and 163.3164, Florida Statutes, the Board of County Commissioners shall determine whether the application satisfies the statutory definition of an agricultural enclave based upon the application, the written report prepared pursuant to Section 163.3162(4)(a), Florida Statutes, testimony presented during the public hearing, and any other competent substantial evidence contained in the record.

Certification of an agricultural enclave constitutes only a determination that the statutory requirements for certification have been satisfied. Any subsequent comprehensive plan amendment or development application remains subject to the procedures established by Section 163.3162, Florida Statutes.

CORRESPONDENCE/PHONE CALLS

At the time of writing this staff report, staff has received one (2) letters of opposition relating to this certification request.

SUGGESTED ACTION

APPROVE: Motion to APPROVE Agricultural Enclave Certification Application **ENCERT 2026-12 Star IV Investments** upon finding that, based upon the competent substantial evidence contained in the record, the application demonstrates that the subject parcels satisfy the statutory definition of an agricultural enclave contained in Section 163.3164(4), Florida Statutes, and the certification requirements of Section 163.3162(4)(a), Florida Statutes.

DENY: Motion to DENY Agricultural Enclave Certification Application **ENCERT 2026-12 Star IV Investments** finding, based upon the competent substantial evidence contained in the record, that the subject property does not satisfy the statutory definition of an agricultural enclave under Section 163.3162(4), Florida Statutes; and direct the office of the County Attorney to prepare the final written order, including Findings of fact and conclusions of Law supporting the Board's determination, as required by Section 163.3162(4).

ATTACHMENTS

1. Agricultural Enclave Certification Report
    A. Supporting Documents
2. Correspondence
3. October 1st Certification Letter

ATTACHMENT 1

AGRICULTURAL ENCLAVE

CERTIFICATION REPORT

October 8, 2026

Casey Dendor, AICP
England-Thims & Miller
14775 Old St. Augustine Road
Jacksonville, FL 32258
DendorC@etminc.com

RE: Agricultural Enclave Certification Report (ENCERT 2026-12 Star IV Investments)
Parcel ID# 029340-0000
Parcel Owner: Star Investors IV Limited, LLLP
Property Location: West of S.R. 16, south of the Grand Oaks development, and north of the Windward Ranch development.

Dear Applicant:

This letter is an update to the written report provided on October 1, 2026, regarding **ENCERT 2026-12 Star IV Investments.** Upon further review, it appears that the application does not demonstrate compliance with the location and perimeter calculations in Section 163.3164(4)(c)2, Florida Statutes. Please see the revised analysis regarding Section 163.3164(4)(c)2.

Please find the required written report attached to this letter.

If you have any questions regarding the attached report or need further assistance, please feel free to reach out to me at (904) 209-0669 or pheekin@sjcfl.us.

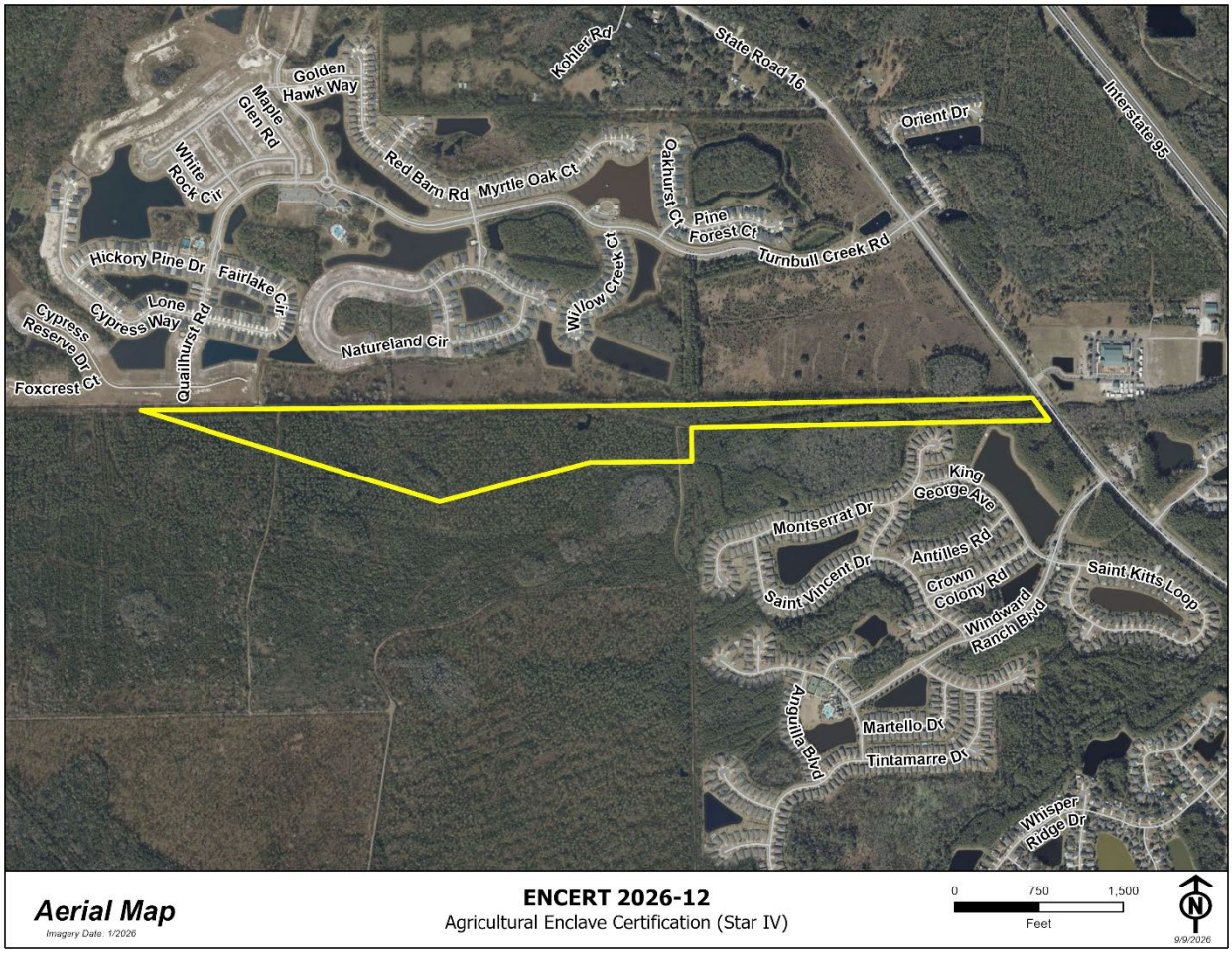
Sincerely,

Patrick Heekin, Planner

APPLICATION SUMMARY

The applicant is seeking certification of an agricultural enclave for approximately 70.83 acres of parcel #029340-0000 ("Subject Property"). The Subject Property is located west of State Road 16. It borders existing residential developments to the north (Grand Oaks) and southeast (Windward Ranch).

Aerial Map of Subject Property



Eligibility Determination:

According to Florida Statutes 163.3162(4)(a), an applicant may apply to the governing body of the local government for certification of the parcel(s) as an agricultural enclave as defined in s. 163.3164 if one or more adjacent parcels or an adjacent development permits the same density as, or higher density than, the proposed development. An applicant seeking such certification may not use the perimeter of another parcel certified by the local government as an agricultural enclave to meet the definition of the term "agricultural enclave."

STAFF EVALUATION SUMMARY:

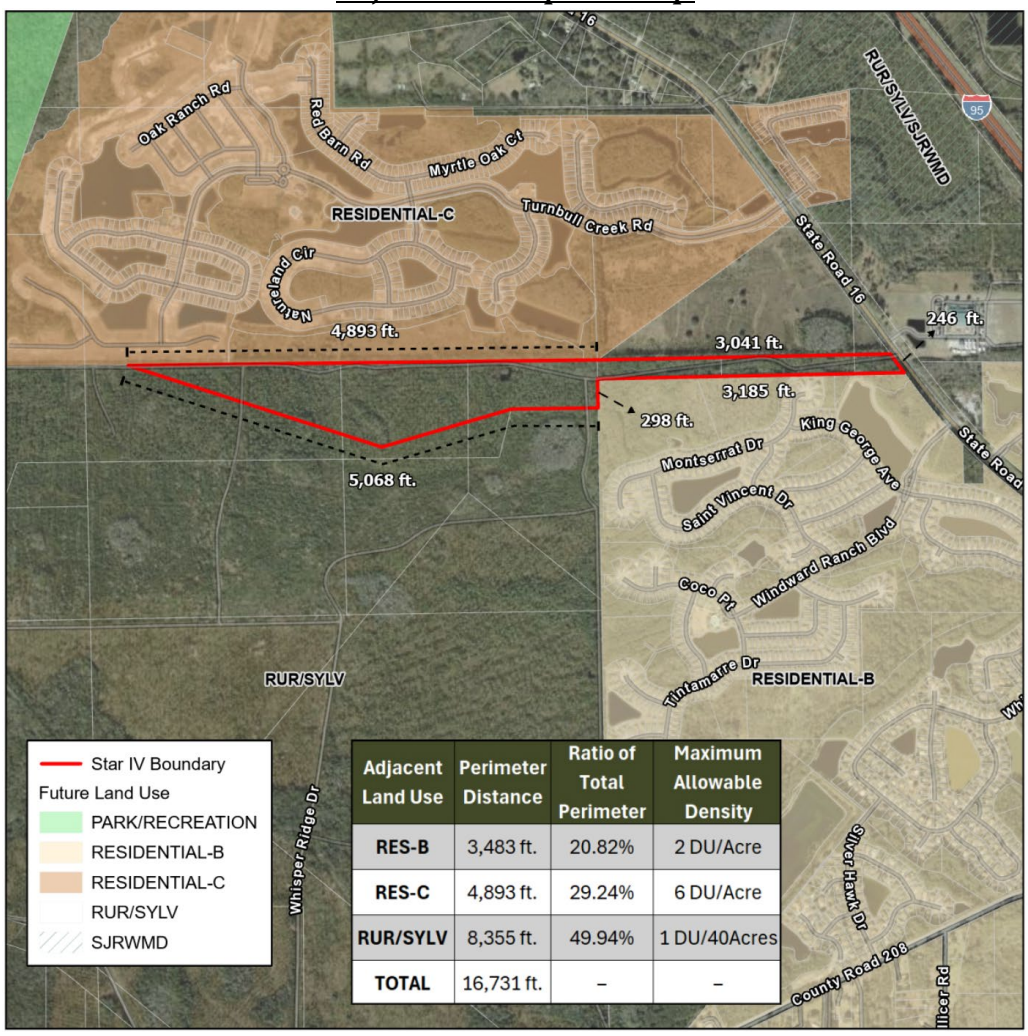
Sections 163.3162 and 163.3164, Florida Statutes as amended by Chapter 2026-34, Laws of Florida, establishes a new process allowing property owners to request certification that a property qualifies as an Agricultural Enclave before pursuing development approvals. The application must be submitted to the local government and requires a determination that the property meets the statutory criteria for an Agricultural Enclave. The local governing body is responsible for reviewing the application and determining whether the application satisfies the statutory definition of "agricultural enclave" contained in section 163.3164(4), Florida Statutes, and approving or denying the certification through a public hearing.

Staff reviewed the application materials submitted by the applicant together with available County records, including, as applicable, Property Appraiser records, recorded instruments, the Comprehensive Plan, the Future Land Use Map, zoning records, aerial imagery, Geographic Information System (GIS) mapping, and other relevant information to determine whether the application demonstrates that the subject property satisfies the statutory definition of an Agricultural Enclave under Sections 163.3162 and 163.3164, Florida Statutes. Based upon the application materials submitted and staff's review, **the application does not demonstrate that the subject property satisfies the statutory definition of an Agricultural Enclave** under Section 163.3164(4), Florida Statutes.

Pursuant to the public hearing process requirements of 163.3162(4), Florida Statutes, this application is scheduled to be heard by the Board of County Commissioners on October 20, 2026, to approve or deny certification of parcel(s) as an Agricultural Enclave. Pursuant to Section 163.3162, Florida Statutes, the Board of County Commissioners shall determine, based upon the entire record before it, whether the application demonstrates that the subject property satisfies the statutory definition of an Agricultural Enclave under Section 163.3164(4), Florida Statutes. In making that determination, the Board may consider the application materials, this written report, public comment, and any other competent evidence presented at the public hearing.

Certification of an Agricultural Enclave constitutes a determination only that the subject property satisfies the statutory definition of an Agricultural Enclave under Section 163.3164(4), Florida Statutes. Certification does not approve a comprehensive plan amendment, rezoning, development order, site development plan, or authorize development. If certified, any subsequent application for development will be processed pursuant to section 163.3162(4), Florida Statutes.

Adjacent Development Map:



Adjacent Land Use	Perimeter Distance	Ratio of Total Perimeter	Maximum Allowable Density
RES-B	3,483 ft.	20.82%	2 DU/Acre
RES-C	4,893 ft.	29.24%	6 DU/Acre
RUR/SYLV	8,355 ft.	49.94%	1 DU/40Acres
TOTAL	16,731 ft.	–	–

Adjacent Development Comparison

Criteria	North	East	South	West
FLUM	Residential-C & Rural/Silviculture	S.R. 16 & Residential-B	Rural/Silviculture & Residential-B	Rural/Silviculture
Zoning	Grand Oaks PUD & Open Rural	Windward Ranch PUD & S.R. 16	Windward Ranch PUD & Open Rural	Open Rural
Maximum Permitted Density	PUD: 2.54 units per acre OR: 1 unit per acre	PUD: 1.34 units per acre	PUD: 1.34 units per acre OR: 1 unit per acre	OR: 1 unit per acre
Existing Development	Yes	Yes	Yes	No

Potential Maximum Density

Development Type	Single Family Residential
Total Acreage	Approx. 70.83
Maximum Residential Density	6 dwelling units per Net Acre
Maximum Number of Dwelling Units	424.98

The applicant's full application can be found in **Exhibit A – Supporting Documents**.

CRITERIA ANALYSIS

Section 163.3164(4), Florida Statutes, establishes the statutory definition of an Agricultural Enclave. Staff reviewed the application materials and supporting documentation to determine whether the application demonstrates compliance with each applicable element of the statutory definition. As defined in 163.3164(4), Florida Statutes, to be eligible for certification as an Agricultural Enclave, the following factors must apply to the requested unincorporated, undeveloped parcel or parcels of land as of January 1, 2025:

A. Parcel or parcels are owner or controlled by a single person or entity.

Applicant response: "*As outlined in Section 163.3164(4)(a), the Property must be owned or controlled by a single entity. The Property meets this eligibility criterion and is owned and controlled by Star Investors IV Limited, LLLP. Star Investors IV Limited, LLLP, has continuously owned and controlled the Property since 2002, thereby satisfying the ownership and control requirements set forth in SB 686.*"

Staff review: According to the deed in the application materials and St. Johns County records, Star Investors IV, Limited LLLP has been the owner of the subject property since March 28, 2002.

Finding: Based upon the application materials submitted and staff's review, the application **appears to demonstrate compliance with Section 163.3164(4)(a).**

B. Parcel or parcels have been in continuous use for bona fide agricultural purposes, as defined by s. 193.461, for a period of five (5) years before the date of any comprehensive plan amendment or development application.

Applicant response: "*As required by Section 163.3164(4)(b), eligible properties must have been in continuous use for bona fide agricultural purposes for a period of at least five (5) years. As reflected in the Property Appraiser's records, the Property is classified as Timberland (5500) and qualifies for agricultural classification pursuant to Section 193.461, Florida Statutes. The Property also has an active Forest Management Plan, which guides the ongoing management and harvesting activities occurring on the site. The plan has been periodically updated over the years to ensure the continued management of the Property for bona fide agricultural purposes. A copy of this Forest Management Plan is on file with the County.*

The subject Property has been continuously designated and utilized for bona fide agricultural purposes for a period exceeding five (5) years, thereby satisfying this eligibility requirement."

Staff review: Section 163.3164(4)(b), Florida Statutes, requires that the subject parcel or parcels "have been in continuous use for bona fide agricultural purposes, as defined by s. 193.461, for a period of 5 years before the date of any comprehensive plan amendment or development application."

The applicant states that the subject property has been classified as Timberland and thus qualifies for an agricultural classification pursuant to Section 193.461, Florida Statutes, and has an active Forest Management Plan filed with the County. While a copy of the Forest Management Plan was not furnished by the applicant, staff has verified through the St. Johns County Property Appraiser's records that the subject property has received an agricultural classification pursuant to s. 193.461, Florida Statutes, for each of the preceding five tax years. Although the statute does not expressly require an agricultural classification by the Property Appraiser,

staff reviewed the documentation submitted by the applicant and verified through the St. Johns County Property Appraiser's records that the subject property has received an agricultural classification and agricultural assessment pursuant to Section 193.461, Florida Statutes. Additionally, review of publicly available imagery indicates aerial footprint typical of silvicultural activities during the past 5 years. Specifically rowed timber appears to be present on the majority of the site with some potential wetlands interspersed. Most recent thinning harvest appears to have occurred on the southern portions in 2025-2026 timeframes. Accordingly, staff finds that the criterion set forth in Section 163.3164(4)(b), Florida Statues, has been satisfied.

Finding: Based upon staff's review, the application **appears to demonstrate compliance with Section 163.3164(4)(b).**

C. 1. Are surrounded on at least 75 percent of their perimeter by:
   a. A parcel or parcels that have existing industrial, commercial, or residential development;
   b. A parcel or parcels that the local government has designated, in the local government's zoning map and future land use map, as land that is to be developed for industrial, commercial, or residential purposes, and at least 50 percent of such parcel or parcels is existing industrial, commercial, or residential development; or
   c. A combination of an interstate highway and a parcel or parcels that are within an urban service district, area, or line and that the local government has designated in the local government's future land use map as land that is to be developed for industrial, commercial, or residential purposes;

2. Do not exceed 700 acres and are surrounded on at least 50 percent of their perimeter by a parcel or parcels that the local government has designated on the local government's future land use map as land that is to be developed for industrial, commercial, or residential purposes; and the parcel or parcels are surrounded on at least 50 percent of their perimeter by a parcel or parcels within an urban service district, area, or line; or

3. Are located within the boundary of an established rural study area adopted in the local government's comprehensive plan which was intended to be developed with residential uses;

Applicant response: "*Section 163.3164(4)(C)(2) requires qualifying properties to contain no more than 700 acres and to be surrounded along at least 50 percent of their perimeter by an urban service district, area, or line. The Property contains approximately 70+/- acres, thereby satisfying the statutory acreage limitation.*

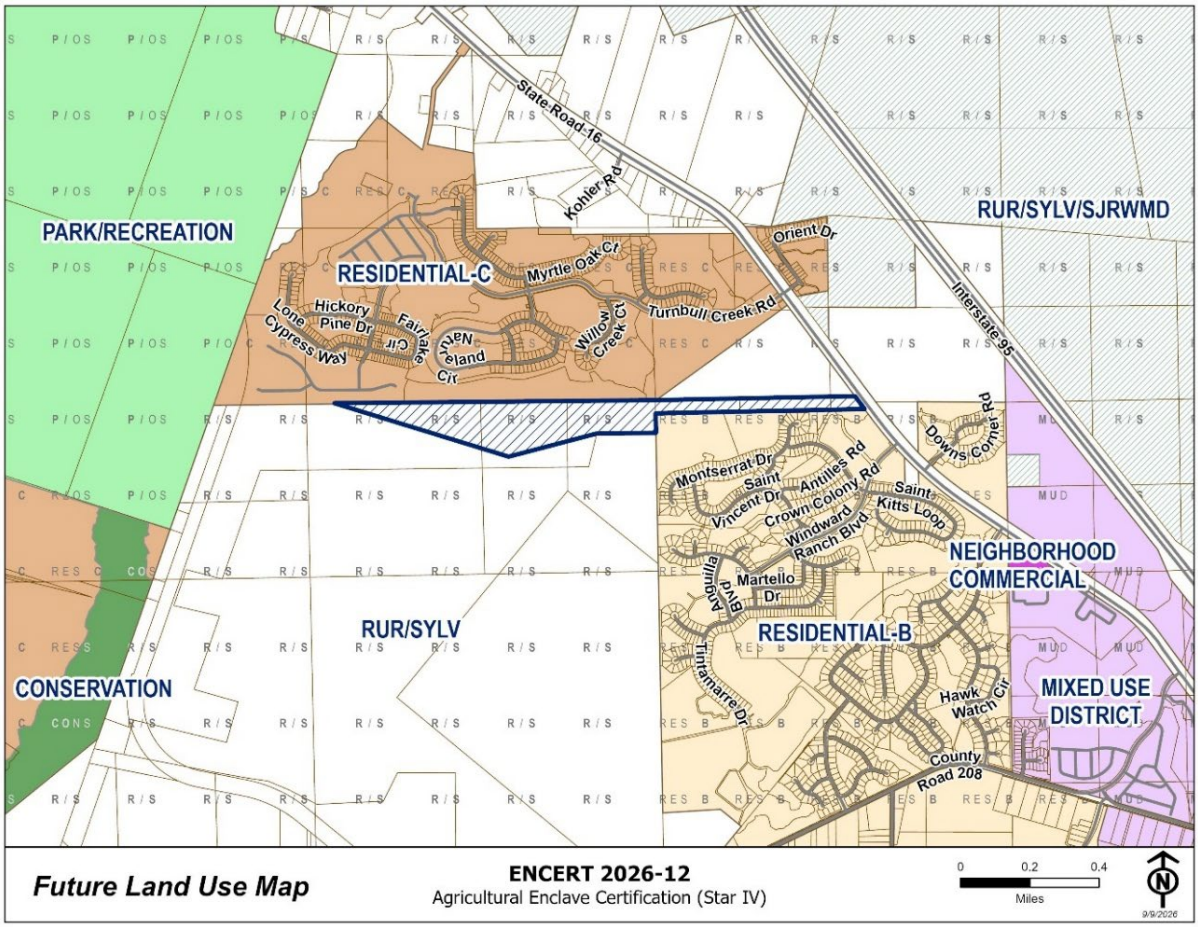
The included survey, signed and sealed by Clary & Associates, confirms that the property meets the minimum perimeter criteria of 50.06%. The property shares adjacency with Residential-C and Residential-B future land use categories. Both properties have approved PUDs for residential development.

The Northwest Sector Overlay is an adopted planning area identified in the St. Johns County Comprehensive Plan for future growth and development and is supported by existing and planned public facilities and services. The development area boundary established by the county's future land use map functions as an urban service district as referenced in SB 686 and defined by 163.3164(53) F.S., "urban service area means areas identified in the comprehensive plan where public facilities and services, including but not limited central water and sewer capacity and roads, are already in place or are identified in the capital improvements elements. The term includes and areas identified in the comprehensive plan as urban service areas, regardless of local government limitation". Additionally, the Property does have access to public services and willing to provide its proportionate share for services and facilities to serve the site.

Accordingly, the Property satisfies the intent and requirements of Section 163.3164(4)(C)3, and is eligible to be classified as an Agricultural Enclave. Specifically, the Property is located within an area that meets the statutory definition of an urban service area, shares more than 50 percent of its boundary with properties within the same district, and has access to existing or planned public infrastructure."

Staff review: The applicant seeks certification under section 163.3164(c)2., Florida Statutes. Although the applicant; subsequent narrative references 163.3164(c)3., the substance of the applicant's analysis and supporting materials addresses the criteria Section 163.3164(c)2. The application does not rely upon the rural study area contained in 163.3164(c)3. Staff have therefore evaluated the application under the qualifying criterion of 163.3164(c)2. below:

Future Land Use Map (in part):



*"**Do not exceed 700 acres and are surrounded on at least 50 percent of their perimeter by a parcel or parcels that the local government has designated on the local government's future land use map as land that is to be developed for industrial, commercial, or residential purposes;**."*

The subject property is below 700 acres, satisfying the limitation established by Section 163.3164(4)(c)2. The St. Johns County Future Land Use designates parcels surrounding the subject property's perimeter as *Residential-B* and *Residential-C*, with no adjacent parcels being designated as commercial or industrial. The applicant's survey identifies approximately 8,376.30 feet of the subject property's 16,731.20-foot perimeter as

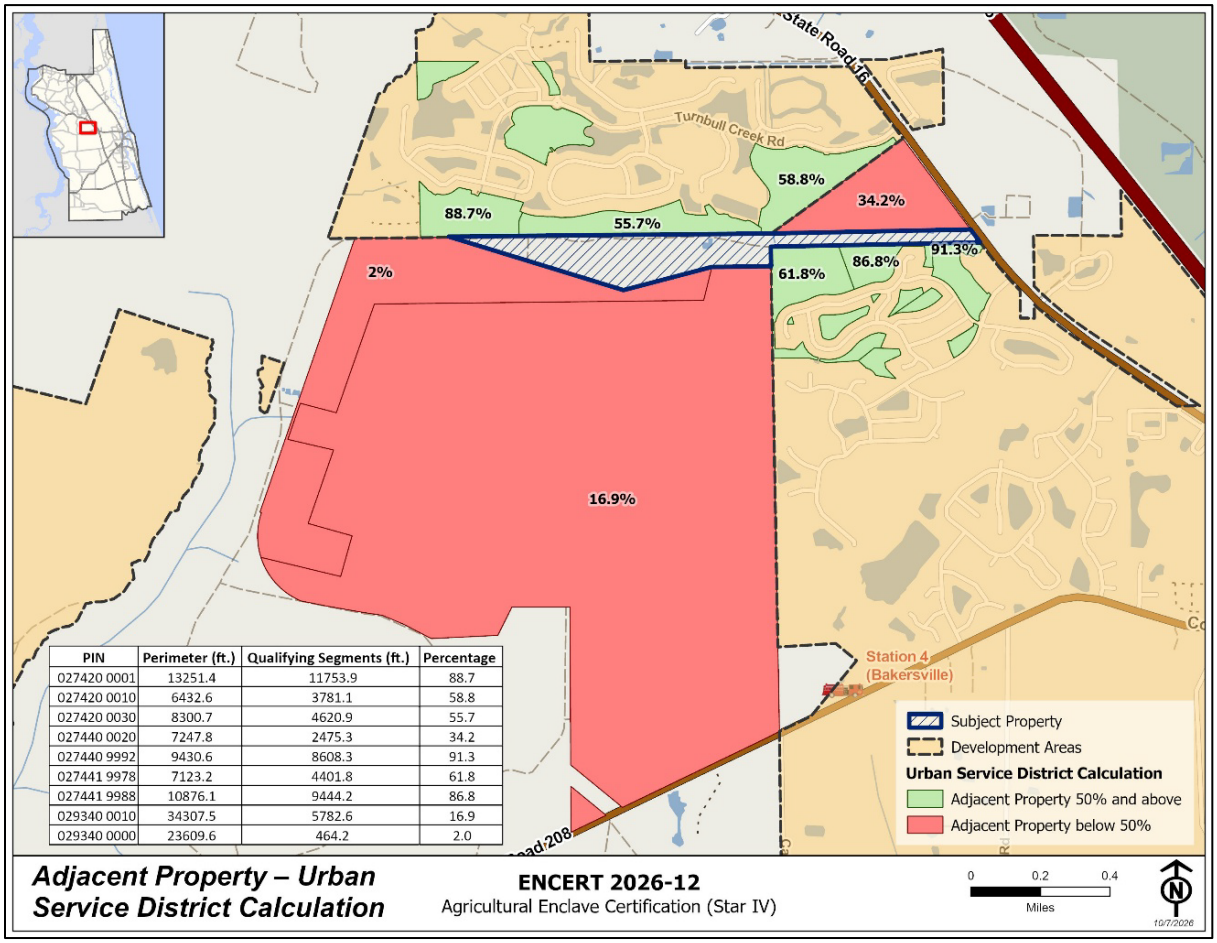
adjoining those residential future land use designations, or approximately 50.06%. Calculations as shown in the certified survey provided by the applicant demonstrate that the proposed Agricultural Enclave's border exceeds the 50% threshold by 10.7 feet.

> "***and the parcel or parcels are surrounded on at least 50 percent of their perimeter by a parcel or parcels within an urban service district, area, or line;***"

The Applicant relies on the County's Development Area and the Northwest Sector Overlay in support of the second requirement of section 163.3164(4)(c)2 as stated in their narrative. Additionally, Section 163.3164(4)(c)2., Florida Statutes, requires that the aforementioned parcel or parcels adjacent to the subject property be surrounded on at least 50 percent of their perimeter(s) by a parcel or parcels within an "*urban service district, area, or line.*"

Additionally, staff has determined that multiple adjacent parcels are not surrounded on at least 50 percent of their respective perimeters by a parcel or parcels within an urban service district, area, or line as illustrated in the *Adjacent Property – Urban Service District Calculation* map below:

Adjacent Property – Urban Service District Calculation:



PIN	Perimeter (ft.)	Qualifying Segments (ft.)	Percentage
027420 0001	13251.4	11753.9	88.7
027420 0010	6432.6	3781.1	58.8
027420 0030	8300.7	4620.9	55.7
027440 0020	7247.8	2475.3	34.2
027440 9992	9430.6	8608.3	91.3
027441 9978	7123.2	4401.8	61.8
027441 9988	10876.1	9444.2	86.8
029340 0010	34307.5	5782.6	16.9
029340 0000	23609.6	464.2	2.0

Section 163.3164(57), Florida Statutes, states an *"urban service area" means areas identified in the comprehensive plan where public facilities and services, including, but not limited to central water and sewer capacity and roads, are already in place or are identified in the capital improvements element. The term includes any areas identified in the comprehensive plan as urban service areas, regardless of local government limitation.*

The St. Johns County Comprehensive Plan establishes a Development Area and directs urban growth and development within that area. The Comprehensive Plan identifies the public facilities and services necessary to serve development within the Development Area, and the Capital Improvements Element identifies existing and planned public facilities and improvements necessary to accommodate such development. Although the Comprehensive Plan does not specifically designate the Development Area by the title "Urban Service Area," the statutory definition is based upon the identification of the area in the comprehensive plan and the provision or planning of the identified public facilities and services.

The ultimate determination of whether the applicable portion of the Development Area constitutes an "urban service district, area, or line" for purposes of section 163.3164(4)(c)2. is to be made by the Board based upon the Comprehensive Plan, Capital Improvements Element, evidence presented, and applicable statutory criteria. Some Commissioners have previously expressed the position that the County's Development Area does not satisfy the statutory definition of an urban service area. The foregoing information is provided to identify the applicable Comprehensive Plan provisions and factual circumstances for the Board's consideration.

Finding: Based upon the application materials submitted and staff's review, the application **does not appear to demonstrate compliance with Section 163.3164(4)(c)2.**

D. Have public services, including water, wastewater, transportation, schools, and recreation facilities, available or such public services are scheduled in the capital improvement element to be provided by the local government or can be provided by an alternate provider of local government infrastructure in order to ensure consistency with applicable concurrency provisions of s. 163.3180, or the applicant offers to enter into a binding agreement to pay for, construct, or contribute land for its proportionate share of such improvements;

Applicant response: "*Section 163.3164(4)(3)(d) requires eligible properties to have adequate public facilities and services available to support development. The subject Property satisfies this criteria through the availability of existing and planned public infrastructure necessary to support the proposed development program.*

Significant public infrastructure investments have occurred within the surrounding area, further demonstrating the availability of public facilities and services. It is understood that potable water and sanitary sewer infrastructure exist along State Road 16 and St. Johns County has capacity to serve this Property. Additionally, as outlined in SB 686, The applicant will enter into a binding agreement to pay for, construct, or contribute land for its proportionate share of such improvements.

Collectively, the availability of existing utility services and the applicant's agreement to pay and contribute its proportionate share, the Property is located within an area capable of supporting the requirements of SB 686, thereby satisfying the eligibility criteria."

Staff review: At the time of writing this letter, staff has confirmed that there are no existing St. Johns County capital improvement projects which would provide access to the proposed parcel(s), however it appears that access could be provided via State Road 16. The Applicant has offered to enter into a binding agreement to pay for, construct, or contribute land for its proportionate share of such improvements, as provided in Section 163.3164(4)(d), Florida Statutes.

Finding: Based upon the application materials submitted and staff's review, the application **appears to demonstrate compliance with Section 163.3164(4)(d).**

E. Not exceeding 1,280 acres; however, if the parcel or parcels are surrounded on at least 75 percent of their perimeter by existing or authorized residential development that will result in a density at buildout of at least 1,000 residents per square mile, the area must be determined to be urban and the parcel or parcels may not exceed 4,480 acres; and

Applicant response: "*Section 163.3164(4)(e) limits eligibility to properties containing no more than 1,280 acres unless additional statutory criteria are satisfied. The subject Property contains approximately 70.83+/- acres, which is well below the maximum acreage threshold. Accordingly, the Property meets the eligibility requirements of this section.*"

Staff review: As previously stated, the subject property is approximately 70.83 acres meeting the requirement not to exceed 1,280 acres.

Finding: Based upon the application materials submitted and staff's review, the application **appears to demonstrate compliance with Section 163.3164(4)(e).**

F. Are located within a county with a population of 1.75 million or less.

Applicant response: "*Section 163.3164(4)(3)(f) requires that eligible properties be located within a county with a population of less than 1.75 million residents. Based on this requirement, only two counties in Florida are ineligible (Broward County and Miami-Dade County).*

St. Johns County is well below the statutory population threshold. According to the Bureau of Economic and Business Research (BEBR), St. Johns County had an estimated population of 348,336 residents in 2025. Accordingly, the subject Property satisfies the eligibility requirements."

Staff review: The applicant cites the Bureau of Economic and Business Research for St. Johns County population statistics, showing that the county meets the requirement with a population less than 1.75 million residents.

Finding: Based upon the application materials submitted and staff's review, the application **appears to demonstrate compliance with Section 163.3164(4)(f).**

CONCLUSION

Based upon the application materials submitted by the applicant and the information reviewed by County staff, the application **does not appear to satisfy the statutory definition of an agricultural enclave** contained in Section 163.3164(4), Florida Statutes, and the certification requirements of Section 163.3162(4)(a), Florida Statutes.

This report constitutes staff's preliminary evaluation required by Section 163.3162(4)(a), Florida Statutes. The Board of County Commissioners must conduct a public hearing and consider the application, this report, and any additional evidence presented before determining whether the subject parcel satisfies the statutory definition of an agricultural enclave and whether certification should be approved or denied.

EXHIBIT

A. Supporting Documents

ATTACHMENT A
SUPPORTING DOCUMENTS

ENGLAND-THIMS & MILLER
14775 Old St. Augustine Road, Jacksonville, FL 32258
etminc.com | 904.642.8990

August 31, 2026

Michael Roberson, AICP
Growth Management Director
St. Johns County Growth Management
4040 Lewis Speedway
St. Augustine, FL 32084

Re: Agricultural Enclave Eligibility
Star IV Investments
Parcel ID: 0293400000

Dear Mr. Roberson,

Effective July 1, 2026, Senate Bill 686 (SB 686) amended Section 163.3162, Florida Statutes, establishing criteria for determining whether a property qualifies as an Agricultural Enclave and is therefore eligible for expedited review and public hearing procedures. Based on the analysis outlined below, the subject property ("Property") satisfies the applicable statutory criteria and qualifies for consideration under the Agricultural Enclave provisions of Section 163.3162, F.S.

The Property is located west of State Road 16, south of the Grand Oaks residential development, and north of the Windward Ranch residential development. The Property consists of an assemblage of commonly owned parcels that have historically been utilized for timber harvesting operations and has an active Timber Management Plan. In its entirety, the Property encompasses approximately 70.83+/- acres and has frontage along State Road 16.

The following analysis outlines the Agricultural Enclave requirements established under SB 686, and demonstrates how the Property satisfies the statutory criteria necessary to qualify as an Agricultural Enclave.

1) Ownership and Use Criteria

a. Lands are owned or controlled by a single person or entity

RESPONSE: As outlined in Section 163.3164(4)(a), the Property must be owned or controlled by a single entity. The Property meets this eligibility criterion and is owned and controlled by Star Investors IV Limited, LLLP. Star Investors IV Limited, LLLP, has continuously owned and controlled the Property since 2002, thereby satisfying the ownership and control requirements set forth in SB 686.

b. Have been in continuous use for bona fide agricultural purposes, as defined by F.S. 193.461, for a period of 5 years before the date of any comprehensive amendment or development application.

RESPONSE: As required by Section 163.3164(4)(b), eligible properties must have been in continuous use for bona fide agricultural purposes for a period of at

least five (5) years. As reflected in the Property Appraiser's records, the Property is classified as Timberland (5500) and qualifies for agricultural classification pursuant to Section 193.461, Florida Statutes. The Property also has an active Forest Management Plan, which guides the ongoing management and harvesting activities occurring on the site. The plan has been periodically updated over the years to ensure the continued management of the Property for bona fide agricultural purposes. A copy of this Forest Management Plan is on file with the County.

The subject Property has been continuously designated and utilized for bona fide agricultural purposes for a period exceeding five (5) years, thereby satisfying this eligibility requirement.

2) Acreage Limits and Perimeter Requirements Criteria

a. Section 163.3164(4), Florida Statutes, provides several ways through which a property may qualify as an Agricultural Enclave. The qualification criteria vary based on factors related to the property's acreage, surrounding land uses, and proximity to urban service areas. Based on the characteristics of the Property and the surrounding development pattern, the Property qualifies under Section 163.3164(4)(c), which provides that an Agricultural Enclave includes:

> Lands that do not exceed 700 acres and are surrounded on at least 50 percent of their perimeter by a parcel or parcels that the local government has designated on the future land use map as land that is to be developed for industrial, commercial, or residential purposes, and where such parcel or parcels are located within or surrounded on at least 50 percent of their perimeter by an urban service district, area, or line.

RESPONSE: Section 163.3164(4)(C)(2) requires qualifying properties to contain no more than 700 acres and to be surrounded along at least 50 percent of their perimeter by an urban service district, area, or line. The Property contains approximately 70+/- acres, thereby satisfying the statutory acreage limitation.

The included survey, signed and sealed by Clary & Associates, confirms that the property meets the minimum perimeter criteria of 50.06%. The property shares adjacency with Residential-C and Residential-B future land use categories. Both properties have approved PUDs for residential development.

The Northwest Sector Overlay is an adopted planning area identified in the St. Johns County Comprehensive Plan for future growth and development and is supported by existing and planned public facilities and services. The development area boundary established by the county's future land use map functions as an urban service district as referenced in SB 686 and defined by 163.3164(53) F.S., "urban service

area means areas identified in the comprehensive plan where public facilities and services, including but not limited central water and sewer capacity and roads, are already in place or are identified in the capital improvements elements. The term includes and areas identified in the comprehensive plan as urban service areas, regardless of local government limitation". Additionally, the Property does have access to public services and willing to provide its proportionate share for services and facilities to serve the site.

Accordingly, the Property satisfies the intent and requirements of Section 163.3164(4)(C)3, and is eligible to be classified as an Agricultural Enclave. Specifically, the Property is located within an area that meets the statutory definition of an urban service area, shares more than 50 percent of its boundary with properties within the same district, and has access to existing or planned public infrastructure.

3) Public Services Criteria

a. Have public services, including water, wastewater, transportation, schools, and recreation facilities, available or such public service are scheduled in the capital improvement to be provided by the local government or can be provided by an alternative provider of local government infrastructure in order to ensure consistency with applicable concurrency provision of F.S. 163.3180, or the applicant offers to enter into a binding agreement to pay for, construct, or contribute land for its proportionate share of such improvements.

RESPONSE: Section 163.3164(4)(3)(d) requires eligible properties to have adequate public facilities and services available to support development. The subject Property satisfies this criteria through the availability of existing and planned public infrastructure necessary to support the proposed development program.

Significant public infrastructure investments have occurred within the surrounding area, further demonstrating the availability of public facilities and services. It is understood that potable water and sanitary sewer infrastructure exist along State Road 16 and St. Johns County has capacity to serve this Property. Additionally, as outlined in SB 686, The applicant will enter into a binding agreement to pay for, construct, or contribute land for its proportionate share of such improvements.

Collectively, the availability of existing utility services and the applicant's agreement to pay and contribute its proportionate share, the Property is located within an area capable of supporting the requirements of SB 686, thereby satisfying the eligibility criteria.

4) Acreage Max

a. Does not exceed 1,280 acres.

RESPONSE: Section 163.3164(4)(e) limits eligibility to properties containing no more than 1,280 acres unless additional statutory criteria are satisfied. The subject Property contains approximately 70.83+/- acres, which is well below the maximum acreage threshold. Accordingly, the Property meets the eligibility requirements of this section.

5) County Population Criteria

a. Located within a county with a population of 1.75 million or less. For the purposes of this section, population is determined in accordance with the most recent official estimate pursuant to F.S. 186.901.

RESPONSE: Section 163.3164(4)(3)(f) requires that eligible properties be located within a county with a population of less than 1.75 million residents. Based on this requirement, only two counties in Florida are ineligible (Broward County and Miami-Dade County).

St. Johns County is well below the statutory population threshold. According to the Bureau of Economic and Business Research (BEBR), St. Johns County had an estimated population of 348,336 residents in 2025. Accordingly, the subject Property satisfies the eligibility requirements.

Based on the analysis provided, the Property satisfies the eligibility criteria of SB 686 for designation as an Agricultural Enclave and is justified as follows:

- Owned and controlled by a single entity;
- Continuous bona fide agricultural use for a minimum of five years in accordance with Section 193.461, F.S.;
- Availability of public facilities and agreement to provide its proportionate share of services necessary to support future development;
- Located in an adopted urban service district, and surrounded by lands within the district along more than 50 percent of its perimeter that directs future development, public services, and infrastructure investments; and
- Located within a County with a population of less than 1.75 million residents.

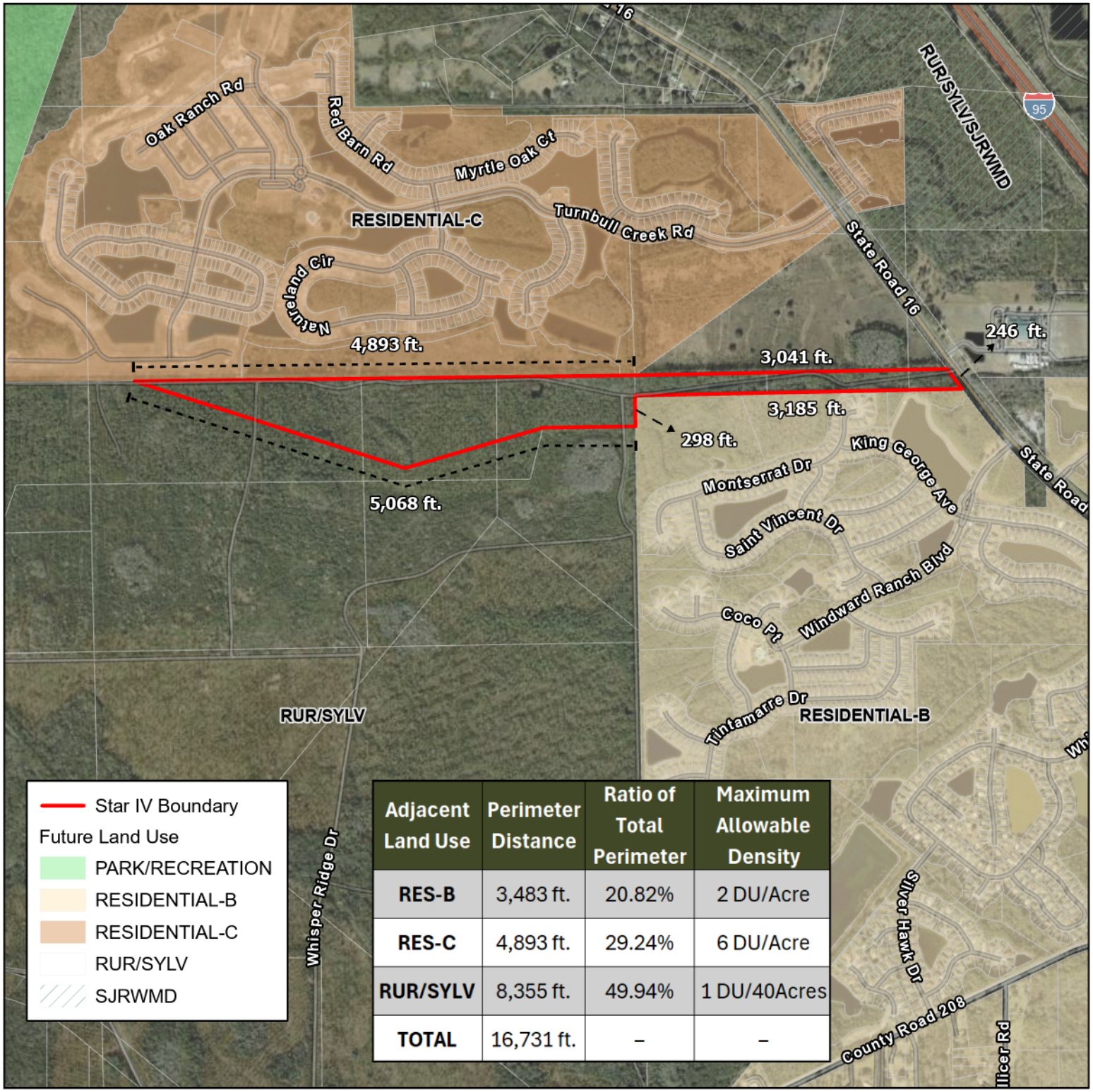
Accordingly, it is determined that the Property qualifies as an Agricultural Enclave, and the Property Owner respectfully requests that the County issue a certification confirming the Property's eligibility and designation as an Agricultural Enclave.

Thank you in advance for your consideration of the above information. Please contact me directly at DendorC@etminc.com or (904) 376-6304 if you have any questions or require additional information.

Sincerely,



Casey Dendor, AICP
Planning Manager



Adjacent Land Use	Perimeter Distance	Ratio of Total Perimeter	Maximum Allowable Density
RES-B	3,483 ft.	20.82%	2 DU/Acre
RES-C	4,893 ft.	29.24%	6 DU/Acre
RUR/SYLV	8,355 ft.	49.94%	1 DU/40Acres
TOTAL	16,731 ft.	–	–

Star IV Investments Agricultural Enclave Perimeter Map

At least 50% of perimeter is designated on the Future Land Use map as land to be developed for industrial, commercial or residential.

Criteria Met 50.06%

Parcel or Parcels are surrounded on at least 50% of their perimeter by a parcel or parcels within an urban service district, area or line.

Criteria Met 50.06%

Development Area Boundary

Eligible Density Under The Agricultural Enclave Is 6 DU/Acre

N W E S

0 0.13 0.25 0.5 Miles

Source: ETM, St Johns County, Esri, Nearmap

ENGLAND-THIMS & MILLER
14775 Old St. Augustine Road, Jacksonville, Florida 32258
904.642.8990 | www.etmgeo.com | www.etminc.com

DISCLAIMER: INFORMATION ON THIS MAP IS SUBJECT TO CONTINUOUS MODIFICATION AND UPDATING. ENGLAND-THIMS & MILLER, INC. (ETM) OFFERS NO WARRANTY EITHER EXPRESSED OR IMPLIED OF THE CONTENT, ACCURACY, OR FITNESS FOR ANY PARTICULAR PURPOSE OF THE INFORMATION INCLUDED HEREON. LIKEWISE, ETM SHALL NOT BE RESPONSIBLE IN ANY WAY FOR ACCURACY OR COMPLETENESS OF THE INFORMATION CONTAINED HEREON. NOT AUTHORIZED FOR DISTRIBUTION OR REPRODUCTION IN ANY FORM.

Date: 8/31/2026

Map Showing

A PORTION OF SECTIONS 34, 35 AND 36, TOWNSHIP 6 SOUTH, RANGE 28 EAST, ST. JOHNS COUNTY, FLORIDA, BEING MORE PARTICULARLY DESCRIBED AS FOLLOWS:

BEGIN AT THE NORTHWESTERLY CORNER OF WINDWARD RANCH PHASE THIRTEEN, RECORDED IN MAP BOOK 87, PAGES 44 THROUGH 51, INCLUSIVE, OF THE PUBLIC RECORDS OF SAID ST. JOHNS COUNTY; THENCE SOUTH 01°01'59" EAST, ALONG THE WESTERLY LINE OF LAST SAID LANDS, 298.04 FEET; THENCE SOUTH 89°21'53" WEST, 903.61 FEET; THENCE SOUTH 75°17'34" WEST, 1387.48 FEET; THENCE NORTH 72°57'33" WEST, 2777.14 FEET, TO THE NORTHERLY LINE OF THOSE LANDS DESCRIBED AND RECORDED IN OFFICIAL RECORDS BOOK 1742, PAGE 1399 OF SAID PUBLIC RECORDS; THENCE NORTH 89°27'02" EAST, ALONG LAST SAID LINE, 4893.07 FEET; THENCE NORTH 88°50'35" EAST, CONTINUING ALONG LAST SAID LINE, 3040.94 FEET, TO THE SOUTHWESTERLY RIGHT OF WAY LINE OF STATE ROAD 16 (A 200 FOOT RIGHT OF WAY, AS NOW ESTABLISHED); THENCE SOUTH 36°40'23" EAST, ALONG LAST SAID LINE, 245.74 FEET, TO THE NORTHERLY LINE OF WINDWARD RANCH PHASE TWO, RECORDED IN MAP BOOK 78, PAGES 10 THROUGH 21, INCLUSIVE, OF SAID PUBLIC RECORDS; THENCE SOUTH 88°50'01" WEST, ALONG LAST SAID LINE AND ALONG THE NORTHERLY LINE OF WINDWARD RANCH PHASE TWELVE, RECORDED IN MAP BOOK 94, PAGES 30 THROUGH 41, INCLUSIVE, OF SAID PUBLIC RECORDS AND THE NORTHERLY LINE OF AFORESAID WINDWARD RANCH PHASE THIRTEEN, 3185.19 FEET, TO THE POINT OF BEGINNING.

CONTAINING 70.83 ACRES, MORE OR LESS.

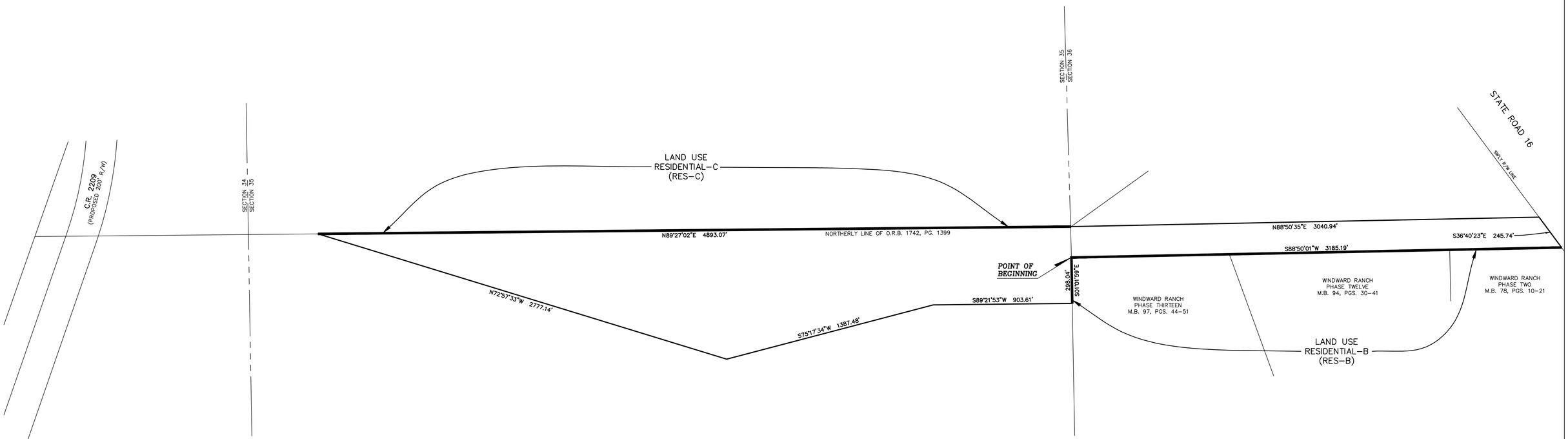
N

GRAPHIC SCALE

0 150 300

(IN FEET)

1 inch = 300 ft.



GENERAL NOTES

1. BEARINGS SHOWN HEREON ARE BASED ON THE SOUTHWESTERLY R/W LINE OF STATE ROAD 16, AS S36°40'23"E, (STATE PLANE COORDINATE SYSTEM, FLORIDA EAST ZONE NAD 1983 1990 NGS ADJUSTMENTS.)

2. THIS MAP DOES NOT REPRESENT A BOUNDARY SURVEY.

4. THIS DRAWING MAY HAVE BEEN ENLARGED OR REDUCED FROM THE ORIGINAL. UTILIZE THE GRAPHIC SCALE AS SHOWN.

LEGEND

R/W = RIGHT OF WAY
O.R.B. = OFFICIAL RECORDS BOOK
M.B. = MAP BOOK
NO. = NUMBER
PG. = PAGE

BORDERING LAND USE PERCENTAGES

OVERALL PERIMETER OF PARCEL	= 16731.20' (100%)
PORTION OF PARCEL BORDERED BY LAND USE RESIDENTIAL-B	= 3483.23' (20.82%)
PORTION OF PARCEL BORDERED BY LAND USE RESIDENTIAL-C	= 4893.07' (29.24%)
PORTION OF PARCEL BORDERED BY LAND USE RESIDENTIAL-B AND RESIDENTIAL-C COMBINED	= 8376.30' (50.06%)

REVISION DATE	DRAFTER	WORK ORDER NO.	REASON FOR REVISION
8-28-26	MJC	N/A	REVISE LIMITS

THIS MAP OR SURVEY MEETS THE STANDARDS OF PRACTICE SET FORTH BY THE FLORIDA DEPARTMENT OF AGRICULTURE AND CONSUMER SERVICES, IN CHAPTER 5J-17, FLORIDA ADMINISTRATIVE CODE, PURSUANT TO SECTION 472.027, FLORIDA STATUTES, UNLESS OTHERWISE SHOWN AND STATED HEREON.

THIS DRAWING, SKETCH, PLAT OR MAP IS NOT VALID UNLESS IT BEARS THE SIGNATURE AND THE ORIGINAL RAISED SEAL OF A FLORIDA LICENSED SURVEYOR AND MAPPER (CHAPTER 5J-17, FLORIDA ADMINISTRATIVE CODE).

MICHAEL J. COLLIGAN LICENSE NUMBER No.6788 STATE OF FLORIDA PROFESSIONAL SURVEYOR & MAPPER

Clary & Associates
PROFESSIONAL SURVEYORS & MAPPERS
LB NO. 3731
3830 CROWN POINT ROAD
JACKSONVILLE, FLORIDA 32257
(904) 260-2703
WWW.CLARYASSOC.COM

MICHAEL J. COLLIGAN, P.S.M. CERT. NO. 6788

FILE No. T6S-2264

JOB No. 2026-466 DRAFTING: MJC CAD FILE: 2026-466.DWG CHECKED BY: DATE: 8-25-26

FILE No. T6S-2264

ST. JOHNS COUNTY
PROPERTY APPRAISER
— Eddie Creamer, CFA —

CEAA IAAO CERTIFICATE OF EXCELLENCE IN ASSESSMENT ADMINISTRATION

September 1, 2026

Mr. Patrick Krechowski
Balch & Bingham LLP
50 N. Laura St., Ste 2100
Jacksonville, FL 32202-3624

Via Email Delivery

Re: Star Investors IV Limited LLLP/Parcel ID Number 029340-0000

Dear Mr. Krechowski:

Star Investors IV Limited LLLP has requested written confirmation from the St. Johns County Property Appraiser's Office that their Parcel Number 029340-0000, 412.64 acres total, 412.64 acres classified located in St. Johns County between County Road 208 and SR-16 has been classified by our Office as agricultural land pursuant to Section 193.461, Florida Statutes, since 2018.

We appreciate the opportunity to verify the agricultural classification of Parcel Number 029340-0000.

Please let me know if we can provide any additional information.

Sincerely,

Eddie Creamer
Property Appraiser

:ccr

From: Casey Dendor
To: Jacob Smith; Patrick Heekin
Cc: Kealey West; Art Lancaster; pkrechowski@balch.com
Subject: RE: ENCERT 2026-12 (?) Star IV
Date: Thursday, September 3, 2026 12:59:13 PM
Attachments: image001.png
Star Investments IV LLL Parcel 029340-0000 letter to Patrick Krechowski.pdf

Good Afternoon, we received a corrected letter from the property appraiser's office this morning. Please find attached for the record.

Casey Dendor, AICP Planning Manager
DendorC@etminc.com | office: 904.376.6304 | cell: 352.408.6881
England-Thims & Miller, Inc. | Career Opportunities

From: Casey Dendor
Sent: Tuesday, September 1, 2026 10:39 AM
To: Jacob Smith <jsmith@sjcfl.us>; Patrick Heekin <pheekin@sjcfl.us>
Cc: Kealey West <kwest@sjcfl.us>; Art Lancaster <aelancaster@eastlanddev.com>; Krechowski, Patrick <pkrechowski@balch.com>
Subject: ENCERT 2026-12 (?) Star IV

Good Morning, Jacob and team –

I am sending this email to notify you that the new Star IV application for agricultural enclave has been filed to the online portal. Please confirm receipt.

If you have any questions during your review, please contact Patrick Krechowski or me directly.

Thank you,
Casey

ETM ENGLAND-THIMS & MILLER
Jacksonville Business Journal BPTW #1 Best Place to Work 2024 & 2025

Casey Dendor, AICP
Planning Manager
DendorC@etminc.com
cell: 352.408.6881
office: 904.376.6304
etminc.com
Career Opportunities

St. Johns County, FL

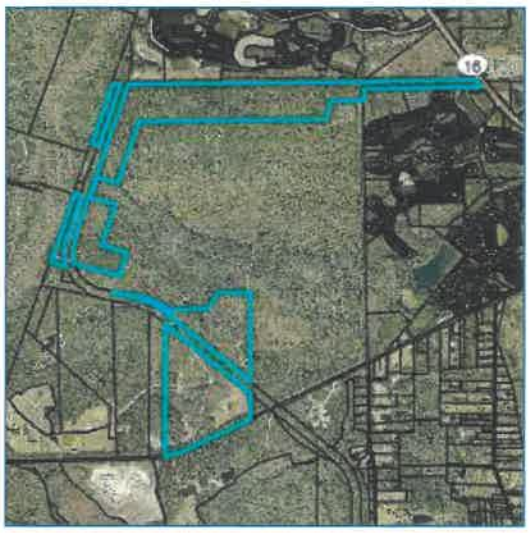
Summary

Parcel ID	0293400000
Location Address	4000 COUNTY ROAD 208 SAINT AUGUSTINE 32092-0000
Neighborhood	M&B 208 east of Pacetti area ex CabHmk (SF) (6540)
Tax Description*	1 PT OF SECS 34 35 36 & FLORA LESLIE GRANT SEC 47 T6S R28E & PT OF SECS 2 3 10 11 & PHILIP WEEDMAN GRANT SEC 37 & FLORA LESLIE GRANT SEC 42 T7S R28E LYING N OF CR208 & W OF SR16 (EX PT IN OR3435/129) (EX PT IN OR4218/972) (EX PT IN OR4568/1106) (EX PT IN OR4568/1110) (EX PT IN OR4586/1627) (EX PT IN OR5923/563) OR1742/1399 ***The Description above is not to be used on legal documents.**
Property Use Code	Timberland 80-89 (5500)
Subdivision	N/A
Sec/Twp/Rng	2-7-28
District	County (District 300)
Millage Rate	13.4686
Acreage	412.640
Homestead	N

No Image Available

Owner Information

STAR INVESTORS IV LIMITED LLLP
100%
2900 HARTLEY RD
JACKSONVILLE, FL 32257-8221



Historical Assessment Information

Year	Building Value	Extra Feature Value	Total Land Value	Ag (Market) Value
2025	$0	$0	$1,728,387	$1,728,387
Ag (Assessed) Value:	$153,553			
Just Market:	$153,553			
Assessed Value:	$153,553			
Exempt Value:	$0			
Taxable Value:	$153,553			
2024	$0	$0	$1,907,776	$1,907,776
Ag (Assessed) Value:	$166,212			
Just Market:	$166,212			
Assessed Value:	$166,212			
Exempt Value:	$0			
Taxable Value:	$166,212			
2023	$0	$0	$1,907,776	$1,907,776
Ag (Assessed) Value:	$166,212			
Just Market:	$166,212			
Assessed Value:	$166,212			
Exempt Value:	$0			
Taxable Value:	$166,212			
2022	$0	$0	$1,907,776	$1,907,776
Ag (Assessed) Value:	$146,254			
Just Market:	$146,254			
Assessed Value:	$146,254			
Exempt Value:	$0			
Taxable Value:	$146,254			
2021	$0	$0	$1,907,776	$1,907,776
Ag (Assessed) Value:	$146,254			
Just Market:	$146,254			
Assessed Value:	$146,254			
Exempt Value:	$0			
Taxable Value:	$146,254			
2020	$0	$0	$1,969,146	$1,969,146
2019	$0	$0	$1,302,942	$1,302,942
2018	$181,412	$10,270	$1,505,008	$1,505,008
2017	$183,427	$10,985	$1,203,784	$1,203,784
2016	$193,922	$11,700	$1,395,182	$1,395,182
2015	$196,030	$12,415	$1,395,182	$1,395,182

No data available for the following modules: Sales Questionnaire Form, Exemption Information, Building Information, Sketch Information, Extra Feature Information.

The St. Johns County Property Appraiser's Office makes every effort to produce the most accurate information possible. No warranties, expressed or implied, are provided for the data herein, its use or interpretation.
| User Privacy Policy | GDPR Privacy Notice
Last Data Upload: 8/26/2026, 3:57:12 AM

Contact Us

Developed by SCHNEIDER GEOSPATIAL

Rec- 46.50
Doc- 36012.30

Public Records of
St. Johns County, FL
Clerk# 02-020429
O.R. 1742 PG 1399
03:18PM 04/08/2002
REC $41.00 SUR $5.50
Doc Stamps $36,042.30

PREPARED BY:
TRACY K. ARTHUR, ESQ.
RAYONIER INC.
P.O. BOX 723
FERNANDINA BEACH, FL 32035

RETURN TO:
BECKY MARIOTTI
Rogers, Towers, Bailey, Jones & Gay
1301 Riverplace Boulevard, Suite 1500
Jacksonville, Florida 32207
(904) 398-3911

COPY

SPECIAL WARRANTY DEED
(Florida Property)

THIS SPECIAL WARRANTY DEED, made this 28 day of March 2002, from **RAYLAND, LLC**, a Delware limited liability company, (formerly known as Rayland Properties, LLC by merger is now known as Rayland, LLC) and **RAYONIER TIMBERLANDS OPERATING COMPANY, L.P., LIMITED PARTNERSHIP,** a Delaware limited partnership, (formerly known as Rayonier Woodlands, LLC by merger is now known as Rayonier Timberlands Operating Company, L.P., Limited Partnership) both with an address of 1901 Island Walkway, Fernandina Beach, Florida 32034 (herein after jointly and severally referred to as "Grantor"), to **STAR INVESTORS IV LIMITED, LLLP**, a Florida limited liability limited partnership, whose address is 2900 Hartley Road, Jacksonville, Florida 32257 (the "Grantee").

W I T N E S S E T H:

That the Grantor, for and in consideration of the sum of Ten and no/100 Dollars and other good and valuable consideration, the receipt of which is hereby acknowledged, hereby grants, bargains, sells, aliens, remises, releases, conveys and confirms unto the Grantee, all that 1,546.43 acres of real property and improvements thereon located in St. Johns County, Florida, and more particularly described as follows (the "Property"):

SEE **EXHIBIT "A"**, ATTACHED HERETO AND BY THIS REFERENCE MADE A PART HEREOF.

THIS CONVEYANCE IS SUBJECT TO: Ad valorem property taxes accruing subsequent to December 31, 2001; existing cemeteries, if any, encroachments, easements, servitudes, covenants, restrictions, rights-of-way, zoning ordinances, outstanding mineral interests, riparian rights, the rights of the public or any governmental entity in and to any portion of the land lying below the ordinary mean high water line of any body of water, and all matters of public record or apparent from a survey or inspection of the Property.

RESERVING UNTO GRANTOR, it successors and assigns, the right and title to all timber and forest products located upon that certain parcel of land depicted as the hatched area upon **EXHIBIT B** and referred to as "Reserved Timber & Forest Products". Grantor, its agent or assigns, may harvest and remove at its discretion, all timber and timber products on the land, for a term of **THREE (3) YEARS** from the date hereof, and furthermore reserves unto itself the right to enter upon the Land with men, machinery and equipment, together with the rights of ingress and egress, and the right to construct as needed, additional roads upon the Land, thereto if necessary or convenient to Grantor, during the term of this Timber Reservation, to harvest and remove such reserved timber and forest products. This timber reservation does not include timber lying within that certain 100 foot wide buffer strip as more particularly depicted upon Exhibit B, referred to as "100 Foot Wide Buffer Strip".

TOGETHER WITH all tenements, hereditaments and appurtenances, thereto belonging or in anywise appertaining.

TO HAVE AND TO HOLD the same in fee simple forever.

AND THE GRANTOR hereby covenants with Grantee that the Grantor is lawfully seized of the Property in fee simple; that the Grantor has good right and lawful authority to sell and convey the Property; that the Grantor hereby fully warrants the title to the Property and will defend the same against the lawful claims of all persons claiming by, through and under the Grantor for claims arising during the period of time of Grantor's ownership of the Property, but against none other.

IN WITNESS WHEREOF, the Grantor has caused this instrument to be executed on the day and year first above written.

RAYLAND, LLC
By its Manager: RAYONIER TIMBERLANDS MANAGEMENT, INC.

Witnesses:

Kathryn P. Terwilliger (Sign)
Kathryn P. Terwilliger (Print)

Deborah Goode (Sign)
Deborah Goode (Print)

By: W. D. Ericksen (Sign)
W. D. Ericksen
As Its: Vice President

ATTEST: Tracy K. Arthur (Sign)
Tracy K. Arthur
As Its: Assistant Secretary

STATE OF Florida
COUNTY OF Nassau

BEFORE ME the undersigned authority personally appeared **W. D. Ericksen** and **Tracy K. Arthur**, as Vice President and Assistant Secretary, respectively, of **RAYONIER TIMBERLANDS MANAGEMENT, INC.** a Delaware corporation, as Manager, by authority and on behalf of **RAYLAND, LLC.,** a Delaware limited liability company, who acknowledged before me the execution of this instrument by authority and on behalf of said limited liability company. Both are personally known to me.

IN WITNESS WHEREOF I have set my hand and seal upon this 28 day of March, 2002.

NOTARY PUBLIC, State of Florida
Commission No._____
My Commission Expires:_____

Susan J. Holcombe (Sign)
Susan J. Holcombe (Print)

Susan J. Holcombe
MY COMMISSION EXPIRES February 19, 2005
#DD002745
Bonded thru J.T. Ferreira Insurance
NOTARY PUBLIC, STATE OF FLORIDA

COPY

RAYONIER TIMBERLANDS OPERATING COMPANY, L.P., Limited Partnership
By its Managing General Partner: **RAYONIER TIMBERLANDS MANAGEMENT, INC.**

Witnesses:

Kathryn P. Perrin Riggs (Sign)
Kathryn P. Perrin Riggs (Print)

Deloane B. Beadle (Sign)
Deloane B. Beadle (Print)

By: W. D. Ericksen (Sign)
W. D. Ericksen
As Its: Vice President

ATTEST: Tracy K. Arthur (Sign)
Tracy K. Arthur
As Its: Assistant Secretary

COPY

STATE OF Florida
COUNTY OF Nassau

BEFORE ME the undersigned authority personally appeared **W. D. Ericksen** and **Tracy K. Arthur**, as Vice President and Assistant Secretary, respectively, of **RAYONIER TIMBERLANDS MANAGEMENT, INC.**, a Delaware corporation, as Managing General Partner, by authority and on behalf of **RAYONIER TIMBERLANDS OPERATING COMPANY, L.P.**, Limited Partnership, a Delaware limited partnership, who acknowledged before me the execution of this instrument by authority and on behalf of said limited partnership. Both are personally known to me.

IN WITNESS WHEREOF I have set my hand and seal upon this 28 day of March, 2002.

NOTARY PUBLIC, State of Florida
Commission No._____
My Commission Expires:_____

Susan J. Holcombe (Sign)
SUSAN J. Holcombe (Print)
(S E A L)

Susan J. Holcombe MY COMMISSION EXPIRES February 19, 2005 #DD002745 Bonded thru J.T. Ferreira Insurance NOTARY PUBLIC, STATE OF FLORIDA

EXHIBIT "A"

LEGAL DESCRIPTION OF OVERALL PROPERTY:

A PORTION OF SECTIONS 34, 35, 36 AND THE FLORA LESLIE GRANT, SECTION 47, TOWNSHIP 6 SOUTH, RANGE 28 EAST; TOGETHER WITH A PORTION OF FRACTIONAL SECTION 2, ALL OF FRACTIONAL SECTION 3, A PORTION OF FRACTIONAL SECTIONS 10, 11, THE PHILIP WEEDMAN GRANT, SECTION 37 AND THE FLORA LESLIE GRANT, SECTION 42, TOWNSHIP 7 SOUTH, RANGE 28 EAST; ALL IN ST. JOHNS COUNTY, FLORIDA AND BEING MORE PARTICULARLY DESCRIBED AS FOLLOWS;

FOR A POINT OF BEGINNING, BEGIN AT A 1/2 INCH IRON PIPE, IDENTIFIED AS "LB 3857", SAID POINT BEING THE NORTHWEST CORNER OF GOVERNMENT LOT 8, SAID SECTION 36 AND RUN NORTH 88°43'16" EAST, ALONG THE NORTHERLY LINE OF SAID GOVERNMENT LOT 8 AND THE NORTHERLY LINE OF GOVERNMENT LOT 7, SAID SECTION 36, SAID LINE ALSO BEING THE SOUTHERLY LINE OF LANDS DESCRIBED IN OFFICIAL RECORDS BOOK 834, PAGE 139 PUBLIC RECORDS OF SAID COUNTY, A DISTANCE OF 3,040.28 FEET TO A 1/2" IRON PIPE IDENTIFIED AS "LB 3857" AT THE SOUTHWESTERLY RIGHT OF WAY LINE OF STATE ROAD 16 (A 200' WIDE RIGHT OF WAY AS NOW ESTABLISHED); THENCE SOUTH 36°47'58" EAST, ALONG SAID SOUTHWESTERLY RIGHT OF WAY LINE, A DISTANCE OF 245.72 FEET TO A 5/8" IRON ROD IDENTIFIED AS "LS 4690" AT THE NORTHEASTERLY CORNER OF LANDS DESCRIBED IN OFFICIAL RECORDS BOOK 1546, PAGE 361, PUBLIC RECORDS OF SAID COUNTY; THENCE SOUTH 88°43'07" WEST, ALONG THE NORTHERLY LINE AND TO THE NORTHWEST CORNER OF SAID LANDS DESCRIBED OFFICIAL RECORDS 1546, PAGE 361, A DISTANCE OF 3,183.48 FEET TO A 4" x 4" CONCRETE MONUMENT IDENTIFIED AS "LS 4690"; THENCE SOUTH 01°09'03" EAST, ALONG THE WEST LINE OF SAID LANDS DESCRIBED IN OFFICIAL RECORDS BOOK 1546, PAGE 361 AND SAID LANDS DESCRIBED IN OFFICIAL RECORDS BOOK 1546, PAGE 365, PUBLIC RECORDS OF SAID COUNTY, A DISTANCE OF 7,369.02 FEET TO A 4" x 4" CONCRETE MONUMENT IDENTIFIED AS "LS 4690" AT THE NORTHWESTERLY RIGHT OF WAY LINE OF COUNTY ROAD 208 (A 66' RIGHT OF WAY AS NOW ESTABLISHED); THENCE SOUTH 64°09'05" WEST, ALONG SAID NORTHWESTERLY RIGHT OF WAY LINE, A DISTANCE OF 5,292.97 FEET TO A POINT OF CURVE TO THE RIGHT HAVING A RADIUS OF 2,717.35 FEET, A CENTRAL ANGLE OF 24°02'30", AND A CHORD BEARING OF SOUTH 76°10'20" WEST, 1,131.87 FEET; THENCE WESTERLY ALONG THE ARC OF THE NORTHERLY RIGHT OF WAY LINE OF SAID COUNTY ROAD 208, A DISTANCE OF 1,140.22 FEET TO THE POINT OF TANGENCY OF SAID CURVE; THENCE SOUTH 88°11'35" WEST, ALONG SAID NORTHERLY RIGHT OF WAY LINE, A DISTANCE OF 4,605.44 FEET TO THE WEST LINE OF SAID SECTION 10, TOWNSHIP 7 SOUTH, RANGE 28 EAST OF SAID COUNTY; THENCE NORTH 01°22'06" WEST, ALONG THE WEST LINE OF SAID SECTION 10, ACROSS SAID PHILIP WEEDMAN GRANT, SECTION 37 AND THE WEST LINE OF SECTION 3 OF SAID TOWNSHIP AND RANGE, A DISTANCE OF 2,175.92 FEET TO A 4" x 4" CONCRETE MONUMENT IDENTIFIED AS "LS 4793" AT THE INTERSECTION OF SAID WEST LINE OF SECTION WITH THE SOUTHERLY LINE OF THE ANTONIO HUERTAS GRANT, SECTION 41, TOWNSHIP 7 SOUTH, RANGE 28 EAST OF SAID COUNTY; THENCE SOUTH 71°12'27" EAST, ALONG THE SOUTHERLY LINE OF SAID SECTION 41, A DISTANCE OF 813.15 FEET TO A 4" x 4" CONCRETE MONUMENT IDENTIFIED AS "LS 4793" AT THE SOUTHEAST CORNER OF SAID SECTION 41; THENCE NORTH 18°58'34" EAST, ALONG THE EAST LINE OF SAID SECTION 41 AND THE EAST LINE OF THE ANTONIO HUERTAS GRANT, SECTION 38, TOWNSHIP 6 SOUTH, RANGE 28 EAST, A DISTANCE OF 6,764.85 FEET TO A 3" x 3" COQUINA MONUMENT WITH NO IDENTIFICATION; THENCE NORTH 19°14'40" EAST, ALONG THE EAST LINE OF SAID SECTION 38, A DISTANCE OF 2,002.28 FEET TO THE NORTHWEST CORNER OF GOVERNMENT LOT 3, SAID SECTION 34, TOWNSHIP 6 SOUTH, RANGE 28 EAST; THENCE NORTH 89°14'00" EAST, ALONG THE NORTH LINE OF SAID GOVERNMENT LOT 3, THE SOUTHWEST 1/4 OF SECTION 35 AND GOVERNMENT LOTS 1 AND 2 OF SECTION 35, A DISTANCE OF 6,736.64 FEET TO THE POINT OF BEGINNING.

CONTAINING 1,869.29 ACRES, MORE OR LESS.

LESS AND EXCEPT

LEGAL DESCRIPTION OF PARCEL THREE WITHIN THE OVERALL PROPERTY (HOME SITE "A"):

A PORTION OF A PORTION OF FRACTIONAL SECTION 3, 10 AND THE PHILIP WEEDMAN GRANT, SECTION 37, TOWNSHIP 7 SOUTH, RANGE 28 EAST, ST. JOHNS COUNTY, FLORIDA AND BEING MORE PARTICULARLY DESCRIBED AS FOLLOWS; FOR A POINT OF REFERENCE, COMMENCE AT A 1/2 INCH IRON PIPE, IDENTIFIED AS "LB 3857", SAID POINT BEING THE NORTHWEST CORNER OF GOVERNMENT LOT 8, SAID SECTION 36, TOWNSHIP 6 SOUTH, RANGE 28 EAST, SAID ST. JOHNS COUNTY, FLORIDA AND RUN NORTH 88°43'16" EAST, ALONG THE NORTHERLY LINE OF SAID GOVERNMENT LOT 8 AND THE NORTHERLY LINE OF GOVERNMENT LOT 7, SAID SECTION 36, SAID LINE ALSO BEING THE SOUTHERLY LINE OF LANDS DESCRIBED IN OFFICIAL RECORDS BOOK 834, PAGE 139 PUBLIC RECORDS OF SAID COUNTY, A DISTANCE OF 3,040.28 FEET TO A 1/2" IRON PIPE IDENTIFIED AS "LB 3857" AT THE SOUTHWESTERLY RIGHT OF WAY LINE OF STATE ROAD 16 (A 200' WIDE RIGHT OF WAY AS NOW ESTABLISHED); THENCE SOUTH 36°47'58" EAST, ALONG SAID SOUTHWESTERLY RIGHT OF WAY LINE, A DISTANCE OF 245.72 FEET TO A 5/8" IRON ROD IDENTIFIED AS "LS 4690" AT THE NORTHEASTERLY CORNER OF LANDS DESCRIBED IN OFFICIAL RECORDS BOOK 1546, PAGE 361, PUBLIC RECORDS OF SAID COUNTY; THENCE SOUTH 88°43'07" WEST, ALONG THE NORTHERLY LINE AND TO THE NORTHWEST CORNER OF SAID LANDS DESCRIBED OFFICIAL RECORDS 1546, PAGE 361, A DISTANCE OF 3,183.48 FEET TO A 4" x 4" CONCRETE MONUMENT IDENTIFIED AS "LS 4690"; THENCE SOUTH 01°09'03" EAST, ALONG THE WEST LINE OF SAID LANDS DESCRIBED IN OFFICIAL RECORDS BOOK 1546, PAGE 361 AND SAID LANDS DESCRIBED IN OFFICIAL RECORDS BOOK 1546, PAGE 365, PUBLIC RECORDS OF SAID COUNTY, A DISTANCE OF 7,369.02 FEET TO A 4" x 4" CONCRETE MONUMENT IDENTIFIED AS "LS 4690" AT THE NORTHWESTERLY RIGHT OF WAY LINE OF COUNTY ROAD 208 (A 66' RIGHT OF WAY AS NOW ESTABLISHED); THENCE SOUTH 64°09'05" WEST, ALONG SAID NORTHWESTERLY RIGHT OF WAY LINE, A DISTANCE OF 5,292.97 FEET TO A POINT OF CURVE TO THE RIGHT HAVING A RADIUS OF 2,717.35 FEET, A CENTRAL ANGLE OF 24°02'30", AND A CHORD BEARING OF SOUTH 76°10'20" WEST, 1,131.87 FEET; THENCE WESTERLY ALONG THE ARC OF THE NORTHERLY RIGHT OF WAY LINE OF SAID COUNTY ROAD 208, A DISTANCE OF 1,140.22 FEET TO THE POINT OF TANGENCY OF SAID CURVE; THENCE SOUTH 88°11'35" WEST, ALONG SAID NORTHERLY RIGHT OF WAY LINE, A DISTANCE OF 4,605.44 FEET TO THE WEST LINE OF SAID SECTION 10 FOR THE POINT OF BEGINNING.

FROM THE POINT OF BEGINNING THUS DESCRIBED, RUN THENCE NORTH 01°22'06" WEST, ALONG THE WEST LINE OF SAID SECTION 10, ACROSS SAID PHILIP WEEDMAN GRANT, SECTION 37 AND THE WEST LINE OF SECTION 3, A DISTANCE OF 2,175.92 FEET TO A 4" x 4" CONCRETE MONUMENT IDENTIFIED AS "LS 4793" AT THE INTERSECTION OF SAID WEST LINE OF SECTION WITH THE SOUTHERLY LINE OF THE ANTONIO HUERTAS GRANT, SECTION 41, TOWNSHIP 7 SOUTH, RANGE 28 EAST OF SAID COUNTY; THENCE SOUTH 71°12'27" EAST, ALONG THE SOUTHERLY LINE OF SAID SECTION 41, A DISTANCE OF 813.15 FEET TO A 4" x 4" CONCRETE MONUMENT IDENTIFIED AS "LS 4793" AT THE SOUTHEAST CORNER OF SAID SECTION 41; THENCE NORTH 18°58'34" EAST, ALONG THE EAST LINE OF SAID SECTION 41, A DISTANCE OF 3227.50 FEET TO A POINT; THENCE SOUTH 79°01'09" EAST, A DISTANCE OF 331.50 FEET TO A POINT; THENCE SOUTH 01°48'25" EAST, A DISTANCE OF 4833.88 FEET TO A POINT ON THE NORTHERLY RIGHT OF WAY LINE OF SAID COUNTY ROAD 208; THENCE SOUTH 88°11'35" WEST, ALONG SAID NORTHERLY RIGHT OF WAY LINE, A DISTANCE OF 2246.32 FEET TO THE POINT OF BEGINNING.

CONTAINING 161.43 ACRES, MORE OR LESS.

AND FURTHER LESS AND EXCEPT

LEGAL DESCRIPTION OF PARCEL FOUR WITHIN THE OVERALL PROPERTY (HOME SITE "B"):

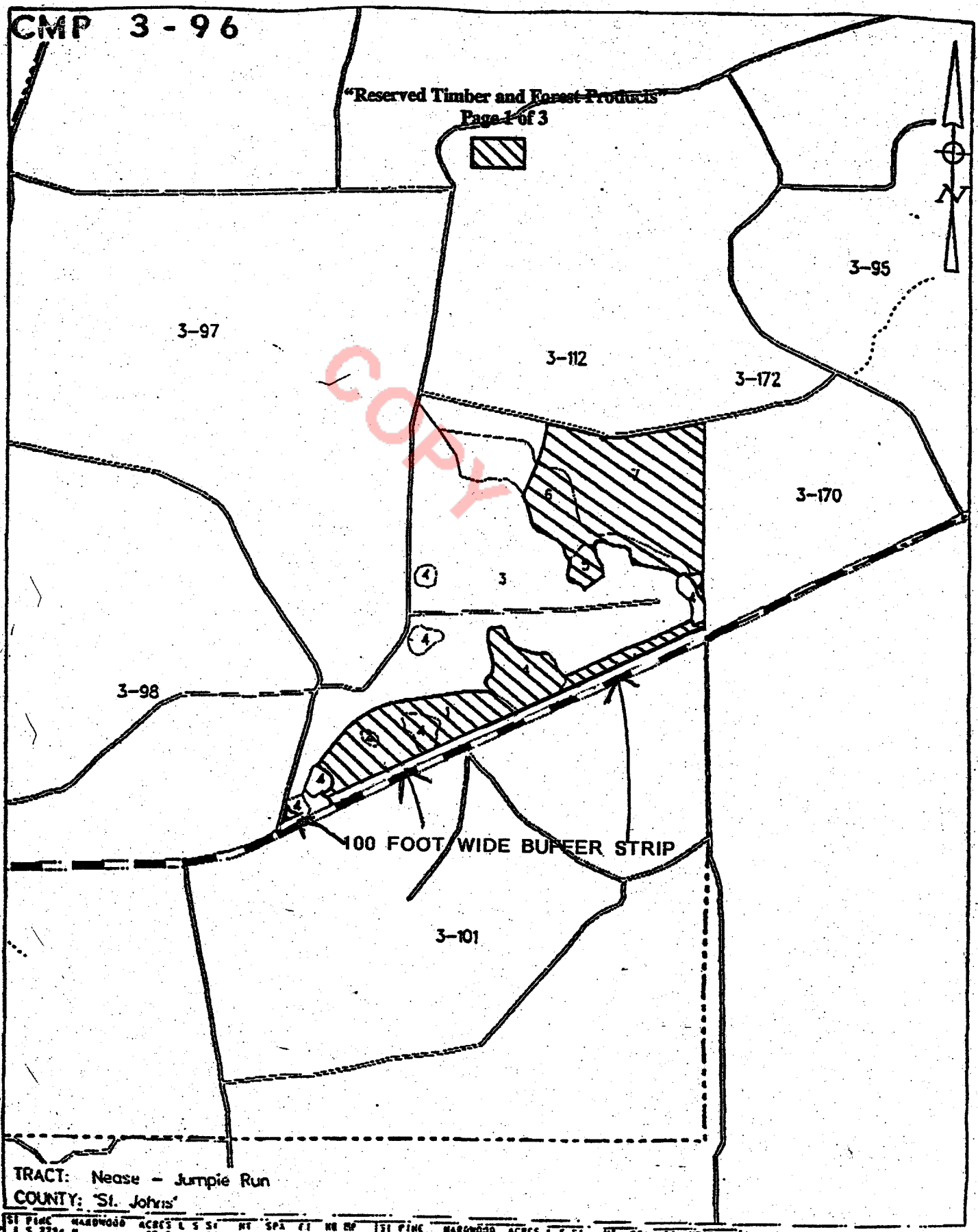
A PORTION OF A PORTION OF FRACTIONAL SECTION 3, 10 AND THE PHILIP WEEDMAN GRANT, SECTION 37, TOWNSHIP 7 SOUTH, RANGE 28 EAST, ST. JOHNS COUNTY, FLORIDA AND BEING

MORE PARTICULARLY DESCRIBED AS FOLLOWS; FOR A POINT OF REFERENCE, COMMENCE AT A 1/2 INCH IRON PIPE, IDENTIFIED AS "LB 3857", SAID POINT BEING THE NORTHWEST CORNER OF GOVERNMENT LOT 8, SAID SECTION 36, TOWNSHIP 6 SOUTH, RANGE 28 EAST, SAID ST. JOHNS COUNTY, FLORIDA AND RUN NORTH 88°43'16" EAST, ALONG THE NORTHERLY LINE OF SAID GOVERNMENT LOT 8 AND THE NORTHERLY LINE OF GOVERNMENT LOT 7, SAID SECTION 36, SAID LINE ALSO BEING THE SOUTHERLY LINE OF LANDS DESCRIBED IN OFFICIAL RECORDS BOOK 834, PAGE 139 PUBLIC RECORDS OF SAID COUNTY, A DISTANCE OF 3,040.28 FEET TO A 1/2" IRON PIPE IDENTIFIED AS "LB 3857" AT THE SOUTHWESTERLY RIGHT OF WAY LINE OF STATE ROAD 16 (A 200' WIDE RIGHT OF WAY AS NOW ESTABLISHED); THENCE SOUTH 36°47'58" EAST, ALONG SAID SOUTHWESTERLY RIGHT OF WAY LINE, A DISTANCE OF 245.72 FEET TO A 5/8" IRON ROD IDENTIFIED AS "LS 4690" AT THE NORTHEASTERLY CORNER OF LANDS DESCRIBED IN OFFICIAL RECORDS BOOK 1546, PAGE 361, PUBLIC RECORDS OF SAID COUNTY; THENCE SOUTH 88°43'07" WEST, ALONG THE NORTHERLY LINE AND TO THE NORTHWEST CORNER OF SAID LANDS DESCRIBED OFFICIAL RECORDS 1546, PAGE 361, A DISTANCE OF 3,183.48 FEET TO A 4" x 4" CONCRETE MONUMENT IDENTIFIED AS "LS 4690"; THENCE SOUTH 01°09'03" EAST, ALONG THE WEST LINE OF SAID LANDS DESCRIBED IN OFFICIAL RECORDS BOOK 1546, PAGE 361 AND SAID LANDS DESCRIBED IN OFFICIAL RECORDS BOOK 1546, PAGE 365, PUBLIC RECORDS OF SAID COUNTY, A DISTANCE OF 7,369.02 FEET TO A 4" x 4" CONCRETE MONUMENT IDENTIFIED AS "LS 4690" AT THE NORTHWESTERLY RIGHT OF WAY LINE OF COUNTY ROAD 208 (A 66' RIGHT OF WAY AS NOW ESTABLISHED); THENCE SOUTH 64°09'05" WEST, ALONG SAID NORTHWESTERLY RIGHT OF WAY LINE, A DISTANCE OF 5,292.97 FEET TO A POINT OF CURVE TO THE RIGHT HAVING A RADIUS OF 2,717.35 FEET, A CENTRAL ANGLE OF 24°02'30", AND A CHORD BEARING OF SOUTH 76°10'20" WEST, 1,131.87 FEET; THENCE WESTERLY ALONG THE ARC OF THE NORTHERLY RIGHT OF WAY LINE OF SAID COUNTY ROAD 208, A DISTANCE OF 1,140.22 FEET TO THE POINT OF TANGENCY OF SAID CURVE; THENCE SOUTH 88°11'35" WEST, ALONG SAID NORTHERLY RIGHT OF WAY LINE, A DISTANCE OF 2359.12 FEET TO THE POINT OF BEGINNING; SAID POINT OF BEGINNING LYING 2246.32 FEET (AS MEASURED ALONG SAID NORTHERLY RIGHT OF WAY LINE) EASTERLY OF THE WESTERLY LINE OF SAID SECTION 10.

FROM THE POINT OF BEGINNING THUS DESCRIBED, RUN THENCE NORTH 01°48'25" WEST, A DISTANCE OF 4833.88 FEET TO A POINT; THENCE SOUTH 79°01'09" EAST, A DISTANCE OF 1546.51 FEET TO A POINT; THENCE SOUTH 01°48'25" EAST, A DISTANCE OF 4491.57 FEET TO A POINT ON THE NORTHERLY RIGHT OF WAY LINE OF COUNTY ROAD 208; THENCE SOUTH 88°11'35" WEST, ALONG SAID NORTHERLY RIGHT OF WAY LINE, A DISTANCE OF 1508.15 FEET TO THE POINT OF BEGINNING.

CONTAINING 161.43 ACRES, MORE OR LESS.

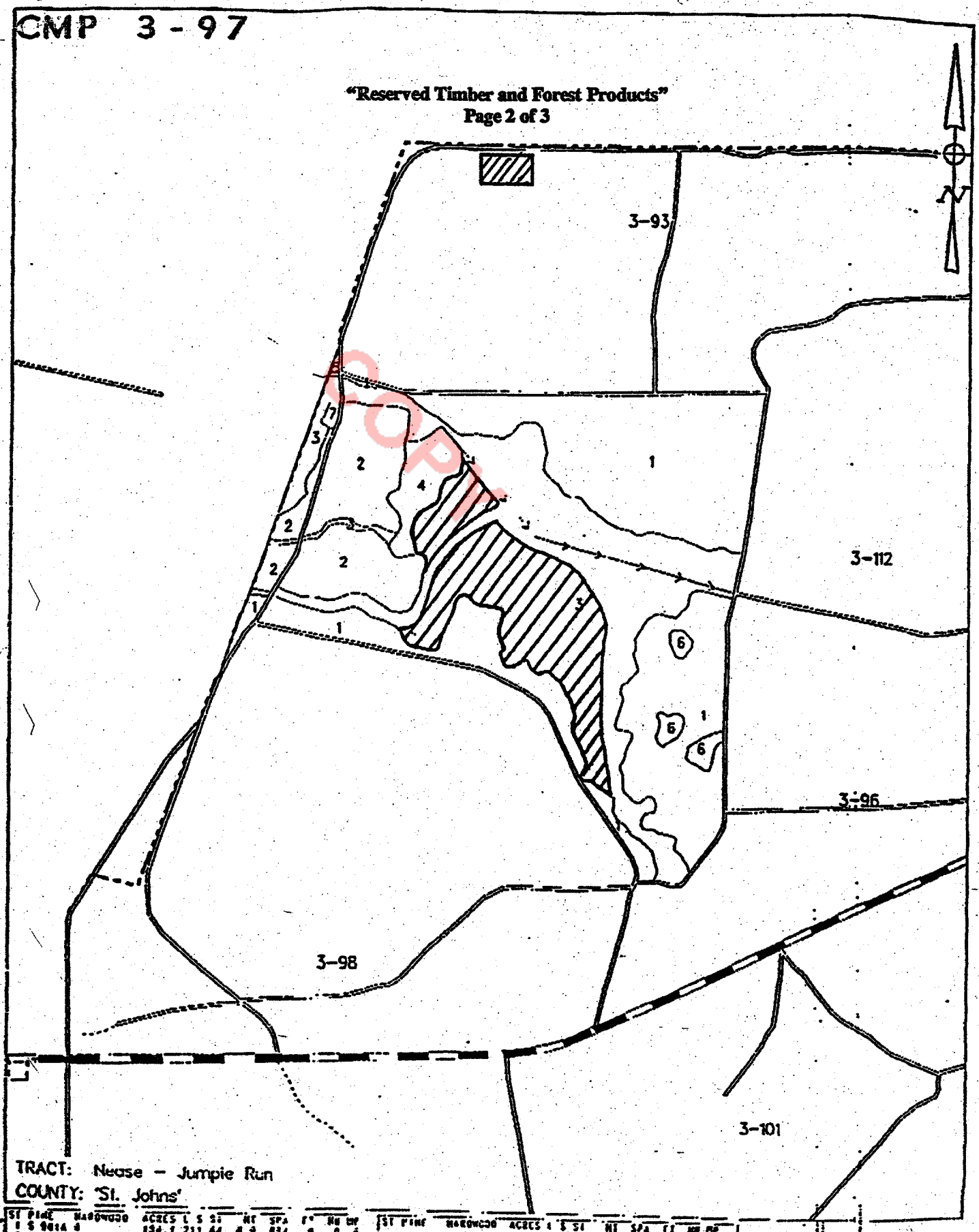
EXHIBIT "B"



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CMP 3-97

"Reserved Timber and Forest Products"
Page 2 of 3

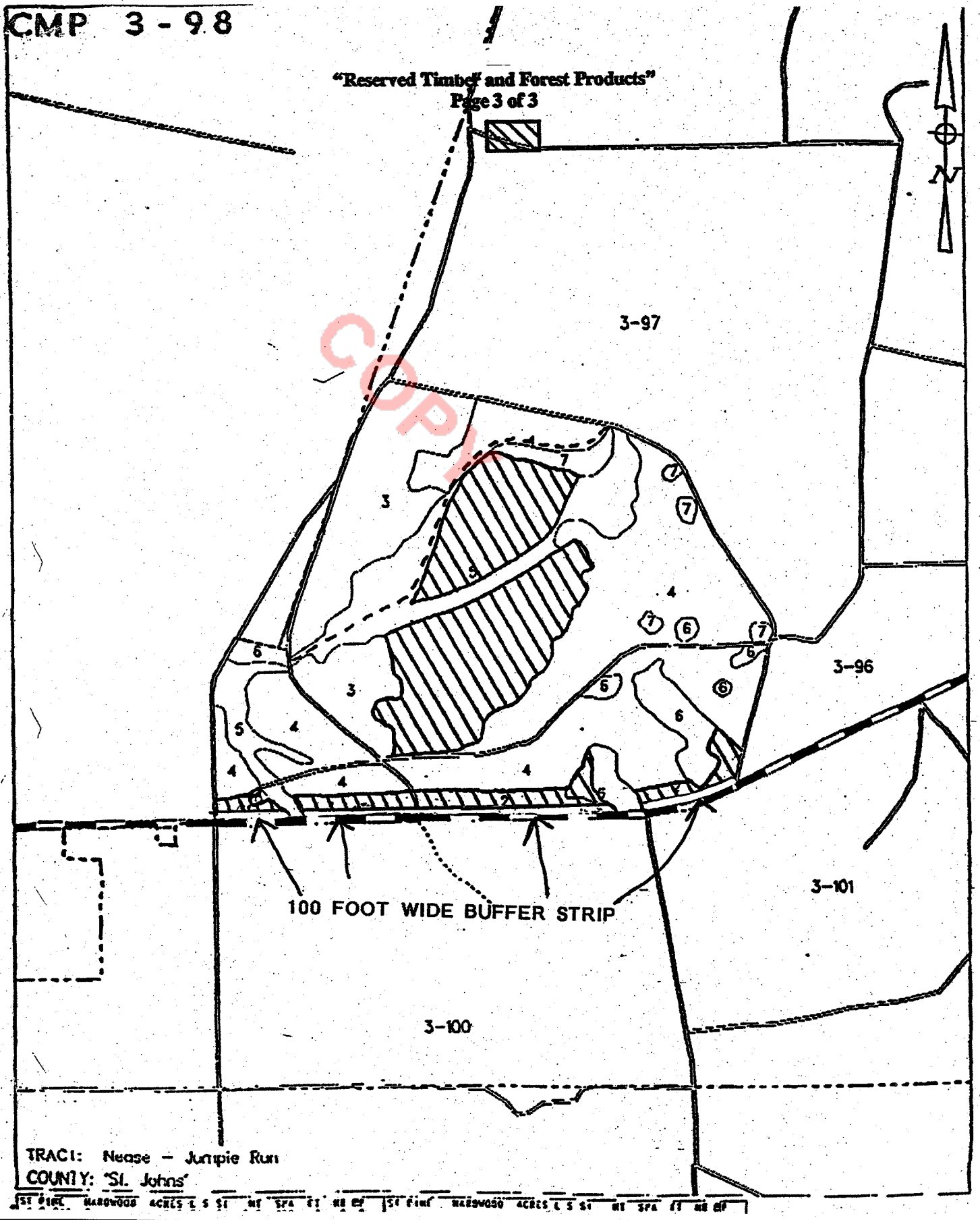


TRACT: Nease – Jumpie Run
COUNTY: St. Johns

EXHIBIT "B"

CMP 3-98

"Reserved Timber and Forest Products"
Page 3 of 3



COPY

TRACT: Nease – Juniple Run
COUNTY: St. Johns

DIVISION OF CORPORATIONS

Department of State / Division of Corporations / Search Records / Search by Entity Name /

Detail by Entity Name

Florida Limited Partnership
STAR INVESTORS IV LIMITED, LLLP

Filing Information

Document Number	A02000000408
FEI/EIN Number	59-2892371
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State	FL
Status	ACTIVE
Last Event	CONTRIBUTION CHANGE
Event Date Filed	04/02/2004
Event Effective Date	NONE

Principal Address

4300 county road 208
st. augustine, FL 32092

Changed: 04/09/2018

Mailing Address

4300 county road 208
st. augustine, FL 32092

Changed: 04/09/2018

Registered Agent Name & Address

FOSTER, RONALD HSR.
4300 county road 208
st. augustine, FL 32092

Address Changed: 04/09/2018

General Partner Detail

Name & Address

Document Number P03000047607

STAR 4 RANCH, INC.
4300 county road 208
st. augustine, FL 32092

Annual Reports

Report Year	Filed Date
2024	04/29/2024
2025	04/27/2025
2026	04/09/2026

Document Images

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04/02/2004 -- Contribution Change	View image in PDF format
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04/30/2003 -- Amendment	View image in PDF format
04/09/2003 -- Contribution Change	View image in PDF format
03/26/2002 -- Amendment	View image in PDF format
03/25/2002 -- CORAPSTQUL	View image in PDF format
03/21/2002 -- Domestic LP	View image in PDF format

Florida Department of State, Division of Corporations

ATTACHMENT 2

CORRESPONDENCE

Patrick Heekin

From: Kerri Gustavson <kerrigustavson@gmail.com>
Sent: Sunday, October 25, 2026 6:10 PM
To: Commissioner Clay Murphy; Jacob Smith; Commissioner Christian Whitehurst; Commissioner Sarah Arnold; Commissioner Krista Joseph; Commissioner Ann Taylor; Kealey West; minutesandrecords@stjohnsclerk.com; Mike Roberson; Patrick Heekin; Rich Komando
Subject: Updated Grounds for Denial on Star IV AGR. Enclave 2026-12
Attachments: ENCERT_2026-12_Star_IV_Grounds_for_Denial_2026-10-25.pdf

Dear County Commissioners and County Staff

Thank you for all you do

Please find attached a second/ updated Grounds for Denial of Agricultural Enclave Star IV 2026-12

I had submitted one based on the October 1 staff report but wish to add this on the record after reviewing the staff report dated 10/08/26.

The record does not establish all statutory prerequisites for certification of the Star IV property as an agricultural enclave. Specifically, the record does not establish

(1) that the area submitted was a parcel or parcels as of January 1, 2025;
(2) that at least 50 percent of the perimeter is bordered by parcels designated for development;

(3) that at least 50 percent of the perimeter is bordered by parcels within an urban service district, area, or line, a theory the Board rejected on September 28, 2026;

(4) that an adjacent parcel or development permits the density stated for the enclave, which on staff's own figures none does; or

(5) that the application is made by the owner or its authorized agent.
Staff's revised report of October 8, 2026 now finds the third requirement unmet, and the application fails that requirement under either reading of the clause.

Neither staff report makes a finding on the first, fourth, or fifth ground. Each ground is independent and sufficient, and the written order should rest on all of them.

Thank you.
Sincerely,
Kerri Gustavson
SJC Resident

Grounds for Denial of Agricultural Enclave Certification

ENCERT 2026-12 (Star IV)

The application seeks certification of a sub-area that was not a parcel on January 1, 2025.

Section 163.3164(4) defines an agricultural enclave as an unincorporated, undeveloped "parcel or parcels" that meet each listed condition "as of January 1, 2025." Section 163.3162(4)(a) authorizes the owner of "a parcel or parcels of land" to apply for certification of "the parcel or parcels." The Senate Rules Committee staff analysis explains that the Act revised the definition to clarify that an enclave may include one or more parcels, and it describes the final committee substitute as revising the bill throughout so that an enclave may be either a parcel or a set of parcels. The Legislature authorized the aggregation of whole parcels. It did not authorize an owner to certify a portion of a parcel bounded by lines of its own choosing.

The application identifies a single tax parcel, 029340-0000. The Property Appraiser's record card and the Property Appraiser's letter of September 1, 2026 both describe that parcel as 412.64 acres. The application requests certification of 70.83 acres. The requested area is described on a Clary & Associates sketch titled "Map Showing," Job No. 2026-466, dated August 25, 2026 and signed August 31, 2026 (record Doc. 728343, Surveys, Aerial, sheet 1 of 1, legal description). Its northern and eastern sides follow the northerly line of the lands described in OR 1742/1399, the right-of-way of State Road 16, and the platted lines of Windward Ranch. Its southwestern side does not. That side consists of three courses of 903.61, 1,387.48, and 2,777.14 feet, a total of 5,068.23 feet, described only by bearing and distance and following no parcel line, lot line, or right-of-way. The remaining 341.81 acres of the parcel lie outside the requested boundary.

A line drawn in August 2026 cannot describe a parcel as it existed on January 1, 2025. The date in the definition fixes the unit being measured as well as the facts measured about it. If an owner may draw its own boundary, the perimeter tests of subparagraph (c) cease to measure anything, because any owner whose land touches designated development could draw a narrow polygon along that edge and certify it. The record shows that this is what occurred. The requested area is a strip lying along the southern edge of Grand Oaks and the northern edge of Windward Ranch, and the drawn southwestern line is the only part of the perimeter over which the applicant had any choice. A Grand Oaks resident's September 2, 2026 email to the Growth Management

Director states that the County's GIS map for this application shows the same highlighted boundaries as the previously withdrawn 176-acre application, ENCERT 2026-04 (record Doc. 728669, Correspondence, Complaints, p. 1). The present request clears the fifty percent threshold by 10.69 feet.

Measured as the parcel that existed on January 1, 2025, the application offers no perimeter analysis at all, and the applicant bears the burden on each condition. Neither the staff report of October 1, 2026 nor the revised report of October 8, 2026 addresses whether a portion of a parcel may be certified. The revised report nevertheless confirms the point. Its Adjacent Property map lists the remainder of parcel 029340-0000, with a perimeter of 23,609.6 feet, as a separate parcel adjoining the requested area (revised report, p. 8). The County's own analysis thus treats the 70.83 acres and the rest of the same tax parcel as two different things, which is what the statute does not allow.

The applicant has not established that fifty percent of the perimeter is bordered by land designated for development.

Subparagraph (c)2. requires that the parcels be surrounded on at least 50 percent of their perimeter by a parcel or parcels that the local government has designated on the future land use map as land that is to be developed for industrial, commercial, or residential purposes. On the applicant's legal description, the total perimeter is 16,731.21 feet (Doc. 728343, sheet 1, legal description and Bordering Land Use Percentages table). The applicant counts 4,893.07 feet along Grand Oaks as Residential-C and 3,483.23 feet along Windward Ranch as Residential-B, for a total of 8,376.30 feet, or 50.06 percent. Fifty percent of the perimeter is 8,365.61 feet. The application clears the threshold by 10.69 feet, which is less than seven hundredths of one percent of the perimeter.

A showing that narrow requires precise proof of where each qualifying segment begins and ends. The record contains none. General Note 2 of the Clary & Associates sketch states that the drawing does not represent a boundary survey (Doc. 728343, sheet 1, General Notes), although the narrative describes it as a signed and sealed survey that confirms the perimeter criteria (Doc. 728342, Narrative, p. 2). The sketch labels the designation of adjoining land but does not depict the future land use map boundaries or certify their location. The applicant's division of the north line into 4,893.07 feet of Residential-C and 3,040.94 feet of Rural/Silviculture assumes that the Residential-C boundary falls exactly on the Section 35 and 36

line, where the deed course changes bearing. The Residential-B frontage likewise assumes that the Windward Ranch designation begins exactly at the point of beginning. If either boundary lies eleven feet from where the applicant places it, or if any part of the north line abuts a Grand Oaks tract that carries a non-residential designation, the application fails.

Both staff reports acknowledge that the calculation exceeds the threshold by about 10.7 feet. Both describe the sketch as a certified survey without addressing General Note 2 (revised report, p. 8), and neither reports any overlay of the future land use map on the legal description. The finding must rest on the future land use map as it stood on January 1, 2025, overlaid on the applicant's legal description. Unless that overlay confirms the applicant's break points within the 10.69-foot margin, the requirement has not been established.

The applicant has not shown that fifty percent of the perimeter is bordered by parcels within an urban service district, area, or line.

Subparagraph (c)2. imposes a second and conjunctive condition: the parcel or parcels must be surrounded on at least 50 percent of their perimeter by a parcel or parcels within an urban service district, area, or line. The Rules staff analysis describes the two perimeter conditions as separate requirements.

The narrative does not quote the enacted text. It quotes a version under which the designated parcels need only be located within, or be surrounded on half their perimeter by, an urban service district. That language does not appear in Chapter 2026-34. Under the enacted text the question is whether the parcels along the subject's own perimeter lie within an urban service district, area, or line.

The applicant relies on the County's Development Area Boundary and the Northwest Sector, and asserts, without citation to any plan policy, map, or ordinance, that the Development Area Boundary functions as an urban service district. The 2025 Comprehensive Plan, which governed on January 1, 2025, does not support that assertion. Policy A.1.2.7 describes Development Areas as the areas on the future land use map that depict the overall future growth pattern of the County. Policy A.1.2.9 directs the County to investigate the designation of an Urban Service Area, which presupposes that no general designation had been made. Where the Plan intends such a designation, it makes it expressly, as with the Durbin Creek National Urban Service Area boundary depicted on the future land use map under Policy A.1.11.1(m)(8)(o) and (ss). The statutory definition reaches areas identified in the comprehensive plan as urban service

areas, and the Plan identifies no such area here.

The County's own records show what designating an urban service area takes. The Durbin Creek National Urban Service Area was created in 2015 by a comprehensive plan amendment designating that property an urban service area under section 163.3164, which the Durbin Park staff report presented to the Board on October 6, 2026 identifies as Ordinance No. 2015-4. It was accompanied by a development agreement approved February 9, 2015 and by two implementing ordinances that fund the required roads, the Durbin Tax Increment Ordinance, No. 2015-5, and the Road Capacity Charge Ordinance, No. 2015-6. The County designated that urban service area by ordinance, mapped it, and funded its infrastructure. Nothing comparable exists for Grand Oaks, Windward Ranch, or any other land along the Star IV perimeter.

The applicant's reading would also leave the second condition without effect. Under Policy A.1.2.7, every future land use designation other than Rural/Silviculture and Agricultural-Intensive is a Development Area. If a Development Area were an urban service area, every parcel designated for residential, commercial, or industrial development would satisfy the second condition automatically, and the second condition would add nothing to the first. The Legislature joined the two with "and," and the second must require something more. The narrative further asserts that the Property itself lies within an urban service area. The Property is designated Rural/Silviculture, and Policy A.1.2.7 states that areas so designated are not Development Areas.

The Board has already decided this question. At a special meeting on September 28, 2026, it voted 3 to 2 to change its August certifications of Heritage East and Heritage West, ENCERT 2026-05 and 2026-06, to denials, after a hearing centered on whether the Development Area boundary qualifies as an urban service area. Heritage has challenged the Board's authority to reconsider those certifications, but the vote is the Board's most recent judgment on the question, and the theory presented here is the same one.

Staff's revised report of October 8, 2026 now finds that the application does not appear to satisfy subparagraph (c)2. (revised report, pp. 8–9). Staff reads the second condition as applying to the designated parcels adjoining the subject property, so that each of them must be surrounded on at least 50 percent of its own perimeter by parcels within an urban service district. Even treating the Development Area as such a district for purposes of the calculation, staff found that multiple adjoining parcels fall short, including parcel 027440-0020 at 34.2 percent, parcel 029340-0010 at 16.9 percent, and the remainder of parcel 029340-0000 at 2.0 percent (revised report, p. 8, Adjacent Property map and table). The application therefore fails under either

reading of the clause. On the reading set out above, no urban service district exists along the perimeter. On staff's reading, the adjoining parcels do not meet the test even if the Development Area is assumed to qualify.

The revised report also withdraws the reasoning that supported the October 1 conclusion. The October 1 report rested its finding on the 2050 Future Land Use Map, adopted April 21, 2026, which cannot establish a condition that must exist as of January 1, 2025, and that map's legend lists Urban Service Area and Development Areas as separate features. The October 1 report also conceded that the Northwest Sector Overlay does not meet the statutory definition. The revised report omits both the map and the concession, but it does not retract the concession. Both reports state that the Capital Improvements Element identifies facilities for the Development Area without citing a project, and both make only one specific finding on capital improvements: under paragraph (d), that no existing County capital improvement project would provide access to the property (revised report, p. 10).

The record shows that the density condition of section 163.3162(4)(a) is not met.

Section 163.3162(4)(a) permits an application only if one or more adjacent parcels or an adjacent development permits the same density as, or higher density than, the proposed development. The written report required by section 163.3162(4)(b) is confined to whether the application complies with paragraph (a), and paragraph (a) incorporates the definition in section 163.3164. The condition is a gate.

Both staff reports quote paragraph (a) under the heading Eligibility Determination but make no finding on it (revised report, p. 2). Their own tables supply the answer (revised report, p. 4). Staff reports the maximum permitted density of the adjacent development as 2.54 units per acre for the Grand Oaks PUD, 1.34 units per acre for the Windward Ranch PUD, and one unit per acre for the adjoining Open Rural land. It reports the potential maximum density of the enclave as six dwelling units per net acre, or 424.98 units, which is the same six units per acre that the applicant's perimeter map claims. A pending major modification of the Grand Oaks PUD, presented to the Board on October 6, 2026, would reduce its maximum from 999 to 954 units. The only density stated anywhere in the record for the enclave is more than twice the highest density that any adjacent parcel or development permits. On staff's own figures, paragraph (a) is not met. If the applicant intends a density at or below 2.54 units per acre, it has not said so, and the comparison the statute requires still cannot be made in its favor.

The application is not shown to be made by the owner or its authorized agent.

Section 163.3162(4)(a) permits an application only by "the owner of a parcel or parcels of land, or such owner's authorized agent or controlling entity." The record owner is Star Investors IV Limited, LLLP, a Florida limited liability limited partnership, under the special warranty deed dated March 28, 2002 and recorded at OR 1742/1399. The Division of Corporations record filed by the applicant identifies the general partner as Star 4 Ranch, Inc. and lists Ronald H. Foster, Sr. only as registered agent.

The applicant of record is England-Thims & Miller, Inc., and its authority rests on a single Owner's Authorization Form. The form names "Star Investors IV Limited, LLC," which is not the record owner. It is signed by "Ron Foster" as "Owner," not on behalf of the general partner, and nothing in the record shows that Mr. Foster is an officer of Star 4 Ranch, Inc. or is otherwise authorized to bind the partnership. The form was executed on June 24, 2026, more than two months before this application was filed, and it authorizes an application described only as "Other." A limited partnership acts through its general partner, and the record contains no act of the general partner authorizing this application. Neither staff report addresses the authorization. On this record the applicant has not shown that it may apply.

A denial should not rest on the staff report's single ground.

Staff now concludes that the application does not appear to satisfy the definition, but that conclusion rests on one ground: staff's reading of the second condition of subparagraph (c)2. as applied to the adjoining parcels. The applicant will contend that the clause refers to the subject parcels instead. If the Board denies certification and the applicant seeks certiorari, the court will review the whole record, including both staff reports, and the October 1 report reached the opposite conclusion. A written order resting only on staff's reading would stand or fall with it. Each ground in this document is independent, and the order should make findings on all of them.

The applicant bears the burden of establishing every element of the definition, and the order should not adopt statements in either staff report that supply what the applicant never proved. Both reports describe a sketch that disclaims being a boundary survey as a certified survey. Both assert that the Capital Improvements Element serves the Development Area without identifying a project. Both tabulate a six-unit density against a 2.54-unit maximum next door and make no density finding. These are staff's statements, not the applicant's proof, and the Board's findings should say so.

The application materials are internally inconsistent.

Several features of the record bear on the weight to be given the applicant's submissions. The narrative's first page is dated August 31, 2026, but each later page is headed July 1, 2026. The application form asks the applicant to list applications currently under review or recently approved, and the field is blank. The form gives the size of the property as 70 acres while identifying a parcel of 412.64 acres, and the narrative describes an assemblage of commonly owned parcels although the application identifies one. The narrative quotes a version of subparagraph (c)2. that was not enacted, and concludes that the Property satisfies subparagraph (c)3., the rural study area provision, which it never analyzes and the record does not support. Its statement that the perimeter figure was confirmed by a signed and sealed survey is contradicted by General Note 2 of the sketch itself, and the Property Appraiser's letter in the file is a corrected letter delivered after filing.

Matters not relied upon.

The special warranty deed recorded at OR 1742/1399 conveyed the lands to Star Investors IV Limited, LLLP in 2002, and the record supports single ownership on January 1, 2025. The Property Appraiser confirms agricultural classification of the entire 412.64-acre parcel since 2018, and staff verified classification for each of the five preceding tax years and aerial imagery consistent with silviculture. That is evidence of the agricultural use required by paragraph (b), although the forest management plan the narrative cites was never furnished. The public services condition of paragraph (d) is satisfied by an offer to enter into a binding proportionate share agreement, which the narrative makes. Whether measured at 70.83 or 412.64 acres, the land is within the 700-acre limit of subparagraph (c)2. and the 1,280-acre limit of paragraph (e), and the County is well within the population limit of paragraph (f). Nothing in the record indicates that an adjoining parcel has been certified as an agricultural enclave or that a recorded conservation easement encumbers the requested area. None of these matters is relied upon as a ground for denial.

Form and timing of the decision.

The application was placed on the Board's October 20, 2026 agenda as Item 5, with the revised staff report as Attachment 1. On October 20 the Board deferred a decision to its

November 3, 2026 meeting. The suggested motion to deny directs the Office of the County Attorney to prepare the final written order, including findings of fact and conclusions of law, as section 163.3162(4) requires. The applicant may seek review by petition for writ of certiorari within thirty days after that order is rendered. Staff treats September 1, 2026 as the date of receipt, so if the Board does not approve or deny the application on November 3, it must do so by November 30, 2026, or the parcel will be certified by operation of law. Attachment 2 to Item 5 contains Ms. Gustavson's September 28, 2026 letter and an earlier version of these grounds; this version supersedes it.

Because maps, reports, and official records are competent substantial evidence, the findings should rest on County records placed in the record at the hearing: the Property Appraiser's parcel map for 029340-0000 as it stood on January 1, 2025; an overlay of the future land use map as of that date on the applicant's legal description, locating the Residential-C and Residential-B boundaries at each break point; the 2025 Comprehensive Plan Land Use Element and Future Land Use Map, including the Development Area Boundary; Ordinance No. 2018-40 and the Windward Ranch zoning approvals; the file for ENCERT 2026-04, including any perimeter calculation it contained; the Property Appraiser's original letter preceding the September 1, 2026 correction; any act of Star 4 Ranch, Inc. authorizing the application; the October 1, 2026 staff report, which the revised report superseded; the Board's September 28, 2026 action on ENCERT 2026-05 and 2026-06; and the Durbin Creek National ordinances and the October 6, 2026 Durbin Park staff report.

Conclusion.

For the reasons stated above, the record does not establish all statutory prerequisites for certification of the Star IV property as an agricultural enclave. Specifically, the record does not establish (1) that the area submitted was a parcel or parcels as of January 1, 2025; (2) that at least 50 percent of the perimeter is bordered by parcels designated for development; (3) that at least 50 percent of the perimeter is bordered by parcels within an urban service district, area, or line, a theory the Board rejected on September 28, 2026; (4) that an adjacent parcel or development permits the density stated for the enclave, which on staff's own figures none does; or (5) that the application is made by the owner or its authorized agent. Staff's revised report of October 8, 2026 now finds the third requirement unmet, and the application fails that requirement under either reading of the clause. Neither staff report makes a finding on the first, fourth, or fifth ground.

Each ground is independent and sufficient, and the written order should rest on all of them.

Record sources reviewed: Star IV Agricultural Enclave Certification Application, ENCERT 2026-12, including the application form (August 31, 2026), narrative (August 31, 2026), Clary & Associates sketch and legal description, Job No. 2026-466 (August 25, 2026; Doc. 728343), perimeter map (August 31, 2026), special warranty deed recorded at OR 1742/1399, Owner's Authorization Form (June 24, 2026), Division of Corporations record, Property Appraiser record card for parcel 029340-0000, Property Appraiser letter (September 1, 2026), and correspondence of September 1 through 3, 2026, including the complaint of Theresa Patch (Doc. 728669); Agricultural Enclave Certification Report of St. Johns County staff (October 1, 2026); hearing notice (October 5, 2026); Board of County Commissioners Agenda Item 5 (October 20, 2026), including the revised Agricultural Enclave Certification Report (October 8, 2026) and its Adjacent Property map; Sections 163.3162(4) and 163.3164, Florida Statutes; Chapter 2026-34, Laws of Florida; Florida Senate Committee on Rules, Bill Analysis, CS/CS/CS/SB 686 (February 25, 2026); St. Johns County 2025 Comprehensive Plan, Land Use Element; Board of County Commissioners agendas of April 21, 2026 and October 6, 2026; Ordinance Nos. 2015-5 and 2015-6.

From: Mike Roberson
To: Patrick Heekin
Subject: FW: URGENT: Filing Error and Contradictory Maps for ENCERT 2026-12 (Star IV / Grand Oaks
Date: Thursday, September 3, 2026 8:05:05 AM
Attachments: IMG_2602.png
IMG_2601.png

From: theresa patch <theresapatch1@yahoo.com>
Sent: Wednesday, September 2, 2026 6:44 PM
To: Mike Roberson <mroberson@sjcfl.us>; FAXPLANDEPT <plandept@sjcfl.us>
Cc: Rich Komando <rkomando@sjcfl.us>; Commissioner Christian Whitehurst <bcc1cwhitehurst@sjcfl.us>; Commissioner Sarah Arnold <bcc2sarnold@sjcfl.us>; Commissioner Clay Murphy <bcc3cmurphy@sjcfl.us>; Commissioner Krista Joseph <bcc4kjoseph@sjcfl.us>; Commissioner Ann Taylor <bcc5ataylor@sjcfl.us>
Subject: URGENT: Filing Error and Contradictory Maps for ENCERT 2026-12 (Star IV / Grand Oaks

Dear St. Johns County Growth Management Staff and County Commissioners,

I am a Grand Oaks resident on Willow Creek Court. I am writing to formally raise a potential filing discrepancy in the newly submitted application ENCERT 2026-12.

The official project description states that this application is restricted to 70.83 acres. However, after reviewing both applications, I confirmed that the GIS map displayed with the application shows the same highlighted boundaries as the previously withdrawn 176-acre application, ENCERT-2026000004.

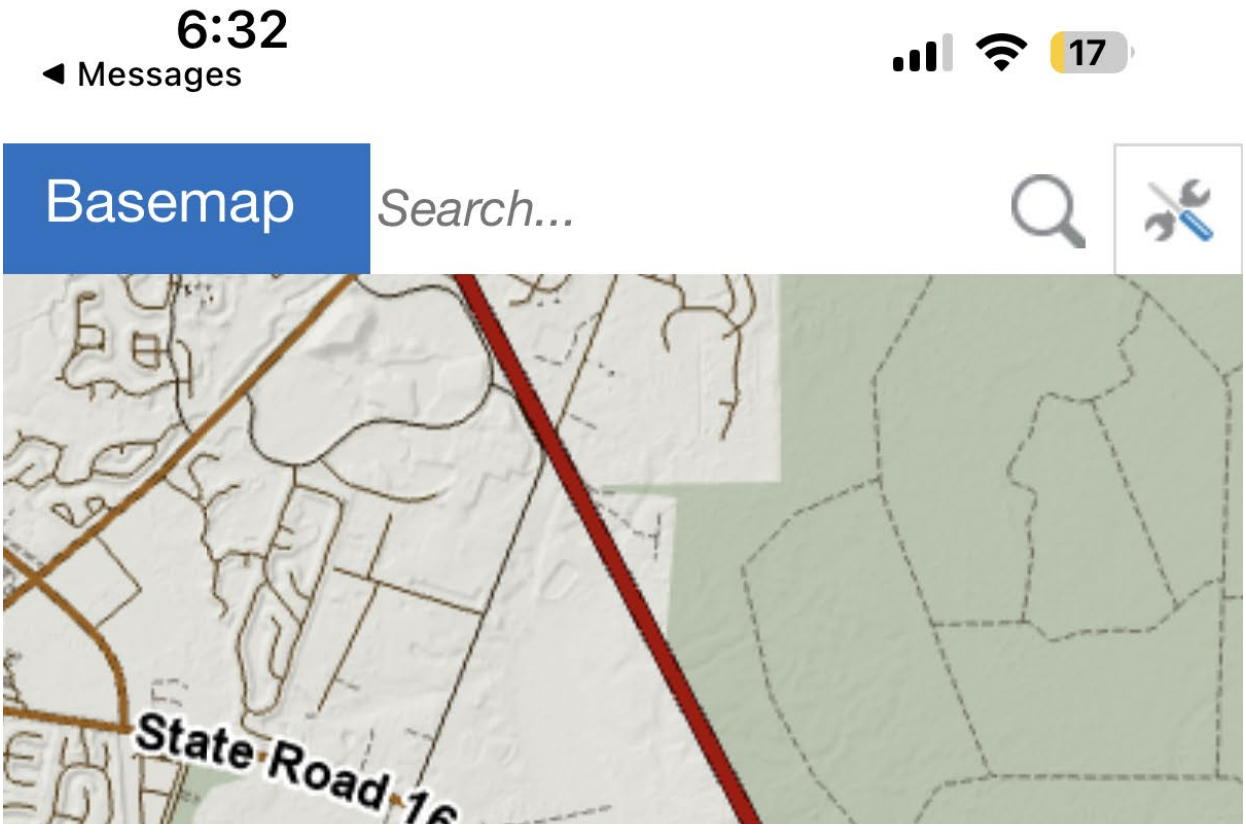
If the new application covers only 70.83 acres, its map should clearly identify that smaller area and distinguish it from the land included in the withdrawn application. From the displayed map, I cannot determine which acreage is included, which is excluded, or whether any surrounding neighborhood conservation areas or wildlife habitat fall within the application. Please explain how the same highlighted boundaries correspond to two substantially different acreage totals.

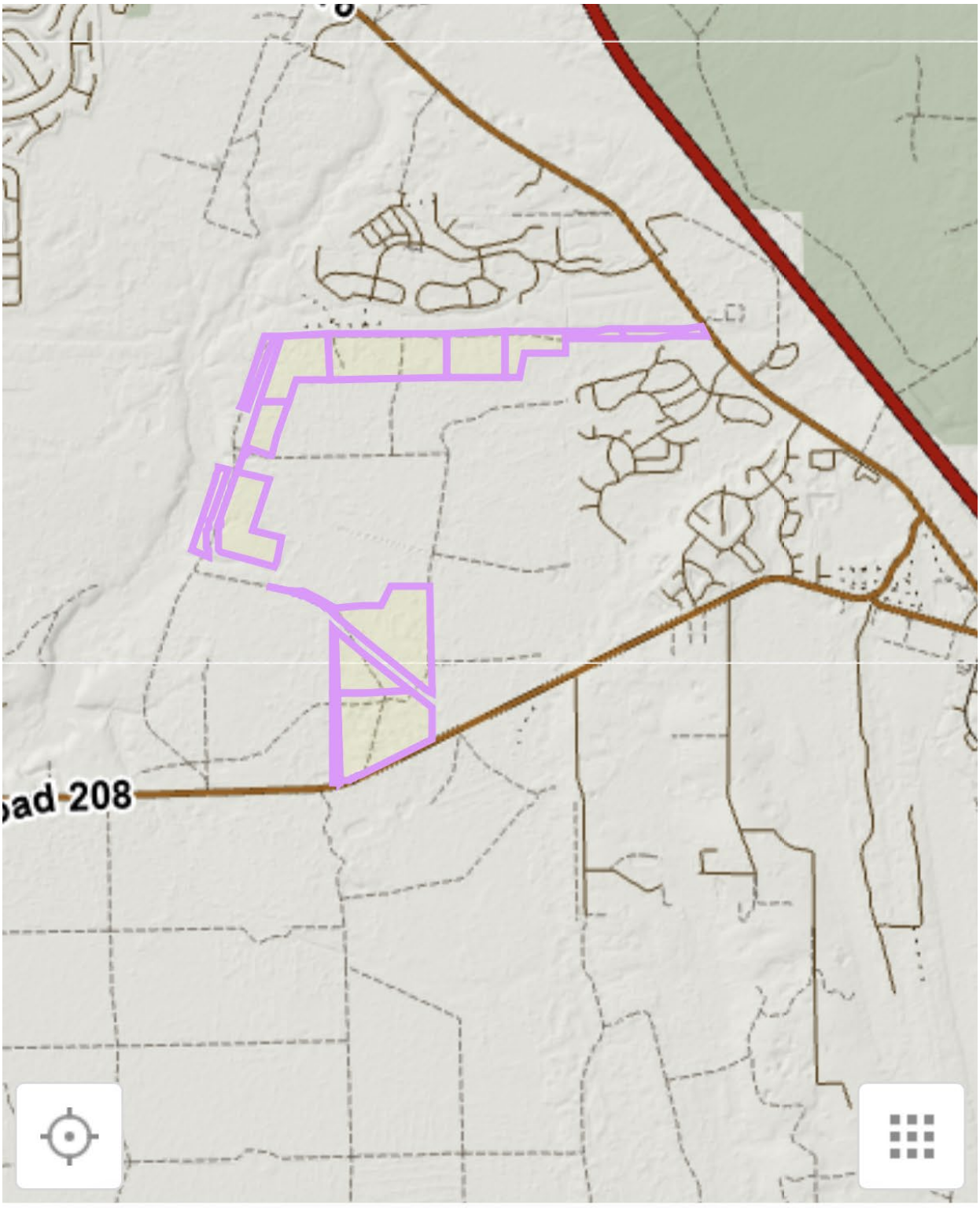
This discrepancy raises serious concerns about the care and accuracy with which the application was prepared. If something as fundamental as the acreage and mapped boundaries does not align, what other inconsistencies may have been overlooked? Residents should not have to identify basic discrepancies in a filing that could affect their community. Given the expedited review process, the county should closely scrutinize each application for accuracy and completeness.

If an accurate map identifying the proposed 70.83 acres has not been provided, I request that Growth Management find the application insufficient and require correction before deeming it complete. I also request a thorough review of the entire submission for accuracy and consistency.

Please confirm the applicable technical review deadline, whether this discrepancy warrants rejection or correction during that review, and whether any expedited timeline under SB 686 can begin before a complete and accurate application is submitted.

I request a written response addressing these concerns and explaining what action the county will take. Thank you, Theresa Patch

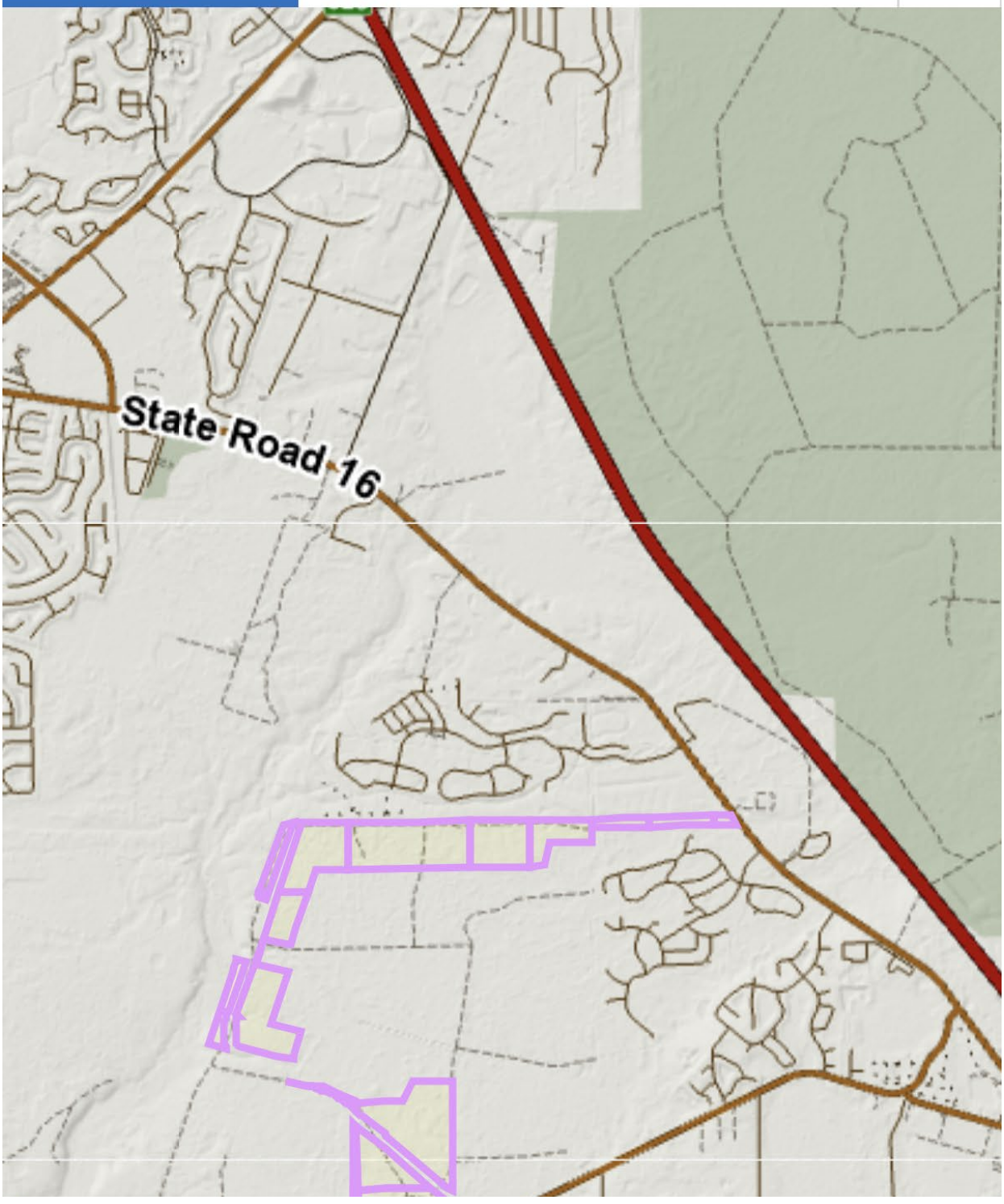


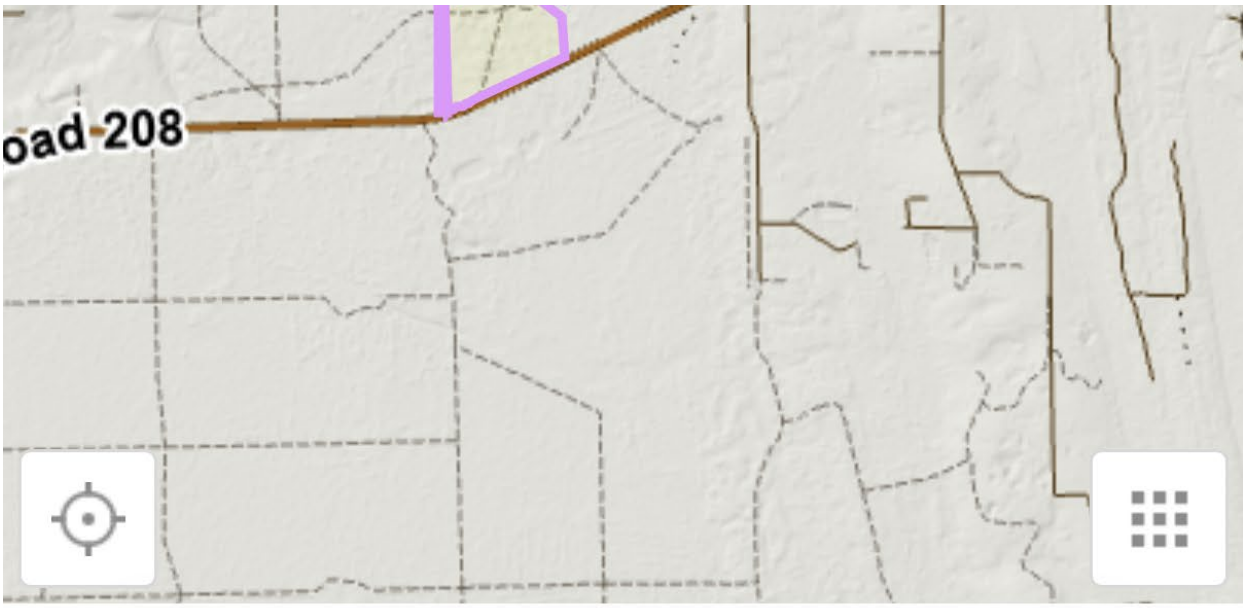


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Basemap

Search...





Sent from Yahoo Mail for iPhone

ATTACHMENT 3

OCTOBER 1ST CERTIFICATION LETTER

October 1, 2026

Casey Dendor, AICP
England-Thims & Miller
14775 Old St. Augustine Road
Jacksonville, FL 32258
DendorC@etminc.com

RE: Agricultural Enclave Certification Report (ENCERT 2026-12 Star IV Investments)
Parcel ID# 029340-0000
Parcel Owner: Star Investors IV Limited, LLLP
Property Location: West of S.R. 16, south of the Grand Oaks development, and north of the Windward Ranch development.

Dear Applicant:

This letter is in response to the application received on September 1, 2026, for an Agricultural Enclave Certification pursuant to Section 163.3162, Florida Statutes. Within thirty (30) days after receipt of an application for Agricultural Enclave Certification, the County is required to provide the applicant with a written report detailing whether the application complies with the requirements of Section 163.3162(4)(a), Florida Statutes.

Please find the required written report attached to this letter.

If you have any questions regarding the attached report or need further assistance, please feel free to reach out to me at (904) 209-0669 or pheekin@sjcfl.us.

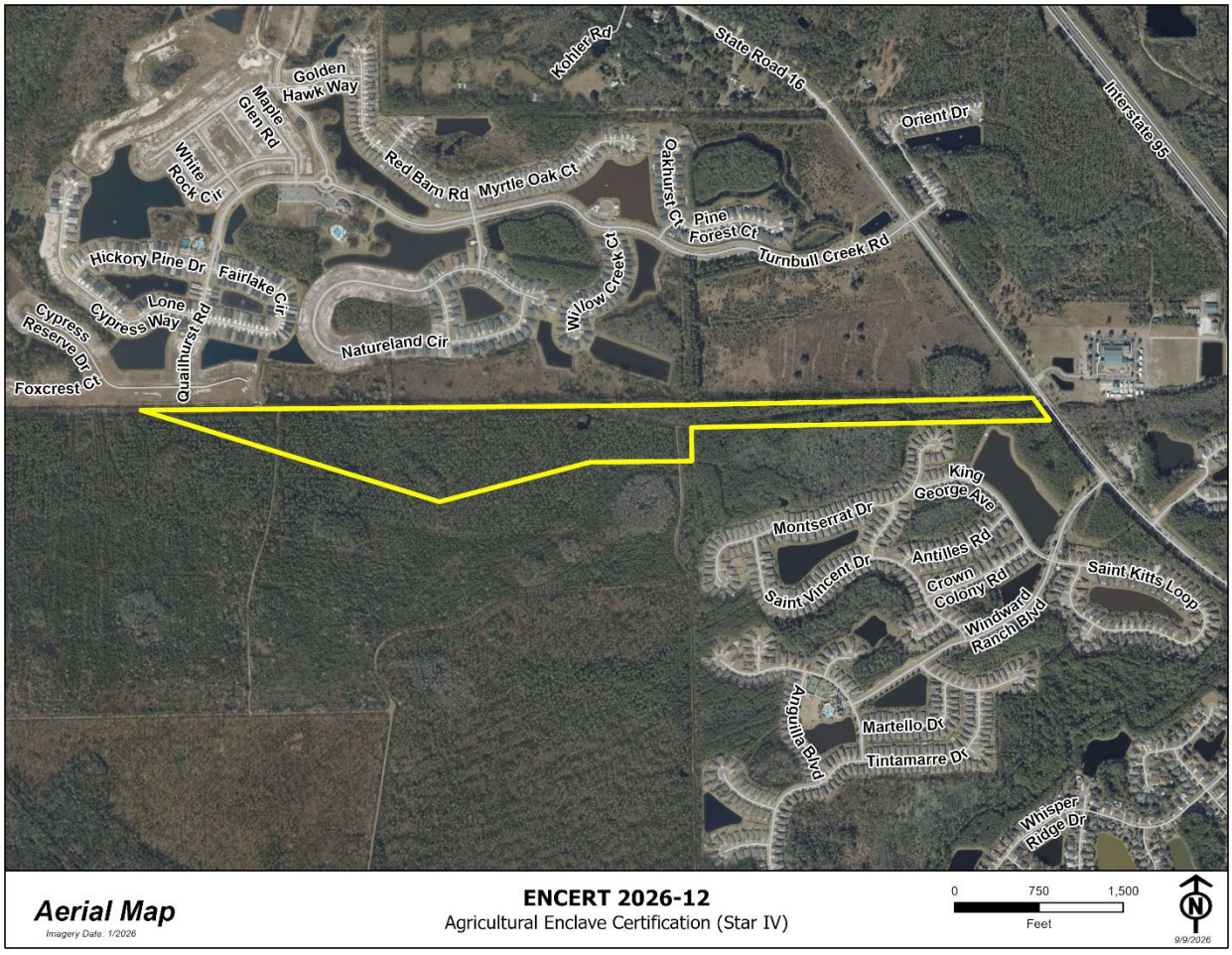
Sincerely,

Patrick Heekin, Planner

APPLICATION SUMMARY

The applicant is seeking certification of an agricultural enclave for approximately 70.83 acres of parcel #029340-0000 ("Subject Property"). The Subject Property is located west of State Road 16. It borders existing residential developments to the north (Grand Oaks) and southeast (Windward Ranch).

Aerial Map of Subject Property



Eligibility Determination:

According to Florida Statutes 163.3162(4)(a), an applicant may apply to the governing body of the local government for certification of the parcel(s) as an agricultural enclave as defined in s. 163.3164 if one or more adjacent parcels or an adjacent development permits the same density as, or higher density than, the proposed development. An applicant seeking such certification may not use the perimeter of another parcel certified by the local government as an agricultural enclave to meet the definition of the term "agricultural enclave."

STAFF EVALUATION SUMMARY:

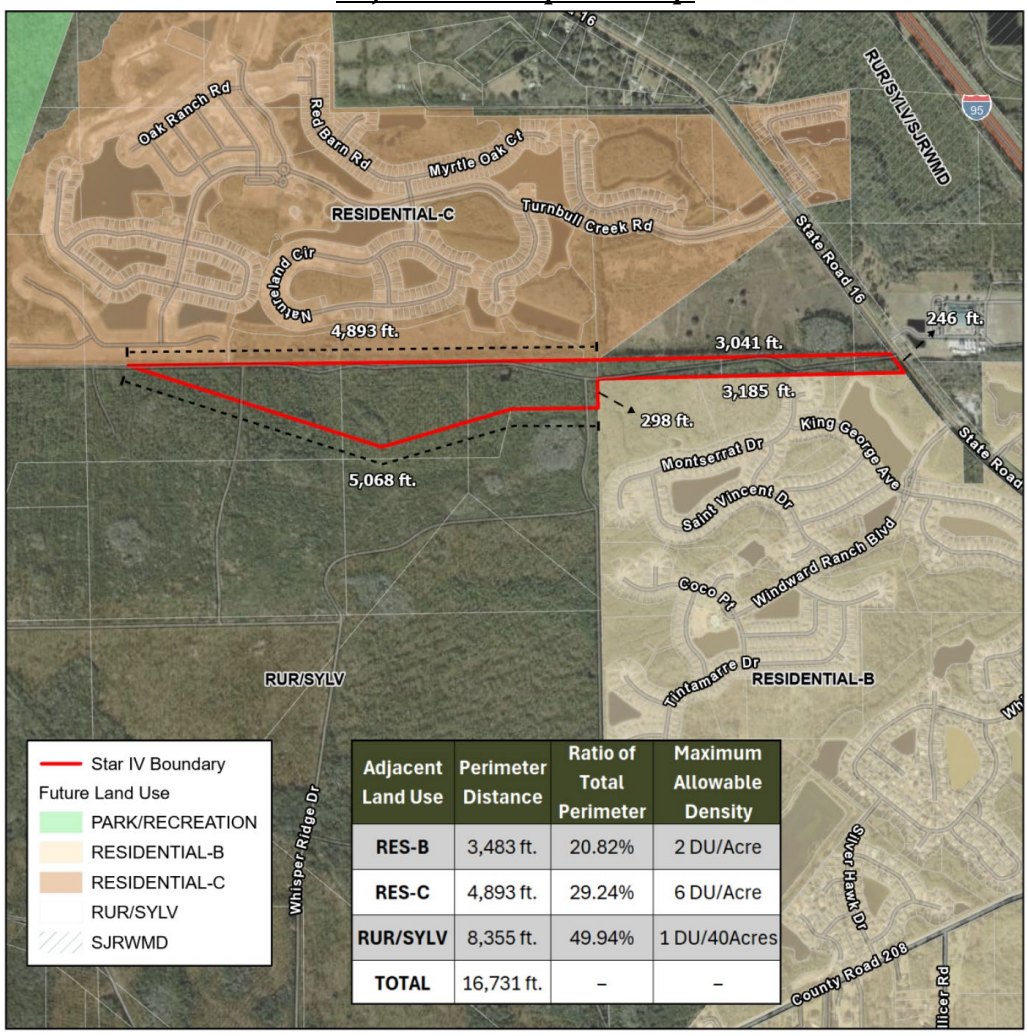
Sections 163.3162 and 163.3164, Florida Statutes as amended by Chapter 2026-34, Laws of Florida, establishes a new process allowing property owners to request certification that a property qualifies as an Agricultural Enclave before pursuing development approvals. The application must be submitted to the local government and requires a determination that the property meets the statutory criteria for an Agricultural Enclave. The local governing body is responsible for reviewing the application and determining whether the application satisfies the statutory definition of "agricultural enclave" contained in section 163.3164(4), Florida Statutes, and approving or denying the certification through a public hearing.

Staff reviewed the application materials submitted by the applicant together with available County records, including, as applicable, Property Appraiser records, recorded instruments, the Comprehensive Plan, the Future Land Use Map, zoning records, aerial imagery, Geographic Information System (GIS) mapping, and other relevant information to determine whether the application demonstrates that the subject property satisfies the statutory definition of an Agricultural Enclave under Sections 163.3162 and 163.3164, Florida Statutes. Based upon the application materials submitted and staff's review, **the application does demonstrate that the subject property satisfies the statutory definition of an Agricultural Enclave** under Section 163.3164(4), Florida Statutes.

Pursuant to the public hearing process requirements of 163.3162(4), Florida Statutes, this application is scheduled to be heard by the Board of County Commissioners on October 20, 2026, to approve or deny certification of parcel(s) as an Agricultural Enclave. Pursuant to Section 163.3162, Florida Statutes, the Board of County Commissioners shall determine, based upon the entire record before it, whether the application demonstrates that the subject property satisfies the statutory definition of an Agricultural Enclave under Section 163.3164(4), Florida Statutes. In making that determination, the Board may consider the application materials, this written report, public comment, and any other competent evidence presented at the public hearing.

Certification of an Agricultural Enclave constitutes a determination only that the subject property satisfies the statutory definition of an Agricultural Enclave under Section 163.3164(4), Florida Statutes. Certification does not approve a comprehensive plan amendment, rezoning, development order, site development plan, or authorize development. If certified, any subsequent application for development will be processed pursuant to section 163.3162(4), Florida Statutes.

Adjacent Development Map:



Adjacent Land Use	Perimeter Distance	Ratio of Total Perimeter	Maximum Allowable Density
RES-B	3,483 ft.	20.82%	2 DU/Acre
RES-C	4,893 ft.	29.24%	6 DU/Acre
RUR/SYLV	8,355 ft.	49.94%	1 DU/40Acres
TOTAL	16,731 ft.	–	–

Adjacent Development Comparison

Criteria	North	East	South	West
FLUM	Residential-C & Rural/Silviculture	S.R. 16 & Residential-B	Rural/Silviculture & Residential-B	Rural/Silviculture
Zoning	Grand Oaks PUD & Open Rural	Windward Ranch PUD & S.R. 16	Windward Ranch PUD & Open Rural	Open Rural
Maximum Permitted Density	PUD: 2.54 units per acre OR: 1 unit per acre	PUD: 1.34 units per acre	PUD: 1.34 units per acre OR: 1 unit per acre	OR: 1 unit per acre
Existing Development	Yes	Yes	Yes	No

Potential Maximum Density

Development Type	Single Family Residential
Total Acreage	Approx. 70.83
Maximum Residential Density	6 dwelling units per Net Acre
Maximum Number of Dwelling Units	424.98

The applicant's full application can be found in **Exhibit A – Supporting Documents**.

CRITERIA ANALYSIS

Section 163.3164(4), Florida Statutes, establishes the statutory definition of an Agricultural Enclave. Staff reviewed the application materials and supporting documentation to determine whether the application demonstrates compliance with each applicable element of the statutory definition. As defined in 163.3164(4), Florida Statutes, to be eligible for certification as an Agricultural Enclave, the following factors must apply to the requested unincorporated, undeveloped parcel or parcels of land as of January 1, 2025:

A. Parcel or parcels are owner or controlled by a single person or entity.

Applicant response: *"As outlined in Section 163.3164(4)(a), the Property must be owned or controlled by a single entity. The Property meets this eligibility criterion and is owned and controlled by Star Investors IV Limited, LLLP. Star Investors IV Limited, LLLP, has continuously owned and controlled the Property since 2002, thereby satisfying the ownership and control requirements set forth in SB 686."*

Staff review: According to the deed in the application materials and St. Johns County records, Star Investors IV, Limited LLLP has been the owner of the subject property since March 28, 2002.

Finding: Based upon the application materials submitted and staff's review, the application **appears to demonstrate compliance with Section 163.3164(4)(a).**

B. Parcel or parcels have been in continuous use for bona fide agricultural purposes, as defined by s. 193.461, for a period of five (5) years before the date of any comprehensive plan amendment or development application.

Applicant response: *"As required by Section 163.3164(4)(b), eligible properties must have been in continuous use for bona fide agricultural purposes for a period of at least five (5) years. As reflected in the Property Appraiser's records, the Property is classified as Timberland (5500) and qualifies for agricultural classification pursuant to Section 193.461, Florida Statutes. The Property also has an active Forest Management Plan, which guides the ongoing management and harvesting activities occurring on the site. The plan has been periodically updated over the years to ensure the continued management of the Property for bona fide agricultural purposes. A copy of this Forest Management Plan is on file with the County.*

The subject Property has been continuously designated and utilized for bona fide agricultural purposes for a period exceeding five (5) years, thereby satisfying this eligibility requirement."

Staff review: Section 163.3164(4)(b), Florida Statutes, requires that the subject parcel or parcels "have been in continuous use for bona fide agricultural purposes, as defined by s. 193.461, for a period of 5 years before the date of any comprehensive plan amendment or development application."

The applicant states that the subject property has been classified as Timberland and thus qualifies for an agricultural classification pursuant to Section 193.461, Florida Statutes, and has an active Forest Management Plan filed with the County. While a copy of the Forest Management Plan was not furnished by the applicant, staff has verified through the St. Johns County Property Appraiser's records that the subject property has received an agricultural classification pursuant to s. 193.461, Florida Statutes, for each of the preceding five tax years. Although the statute does not expressly

require an agricultural classification by the Property Appraiser, staff reviewed the documentation submitted by the applicant and verified through the St. Johns County Property Appraiser's records that the subject property has received an agricultural classification and agricultural assessment pursuant to Section 193.461, Florida Statutes. Additionally, review of publicly available imagery indicates aerial footprint typical of silvicultural activities during the past 5 years. Specifically rowed timber appears to be present on the majority of the site with some potential wetlands interspersed. Most recent thinning harvest appears to have occurred on the southern portions in 2025-2026 timeframes. Accordingly, staff finds that the criterion set forth in Section 163.3164(4)(b), Florida Statues, has been satisfied.

Finding: Based upon staff's review, the application **appears to demonstrate compliance with Section 163.3164(4)(b).**

C. 1. Are surrounded on at least 75 percent of their perimeter by:
   a. A parcel or parcels that have existing industrial, commercial, or residential development;
   b. A parcel or parcels that the local government has designated, in the local government's zoning map and future land use map, as land that is to be developed for industrial, commercial, or residential purposes, and at least 50 percent of such parcel or parcels is existing industrial, commercial, or residential development; or
   c. A combination of an interstate highway and a parcel or parcels that are within an urban service district, area, or line and that the local government has designated in the local government's future land use map as land that is to be developed for industrial, commercial, or residential purposes;

2. Do not exceed 700 acres and are surrounded on at least 50 percent of their perimeter by a parcel or parcels that the local government has designated on the local government's future land use map as land that is to be developed for industrial, commercial, or residential purposes; and the parcel or parcels are surrounded on at least 50 percent of their perimeter by a parcel or parcels within an urban service district, area, or line; or

3. Are located within the boundary of an established rural study area adopted in the local government's comprehensive plan which was intended to be developed with residential uses;

Applicant response: *"Section 163.3164(4)(C)(2) requires qualifying properties to contain no more than 700 acres and to be surrounded along at least 50 percent of their perimeter by an urban service district, area, or line. The Property contains approximately 70+/- acres, thereby satisfying the statutory acreage limitation.*

The included survey, signed and sealed by Clary & Associates, confirms that the property meets the minimum perimeter criteria of 50.06%. The property shares adjacency with Residential-C and Residential-B future land use categories. Both properties have approved PUDs for residential development.

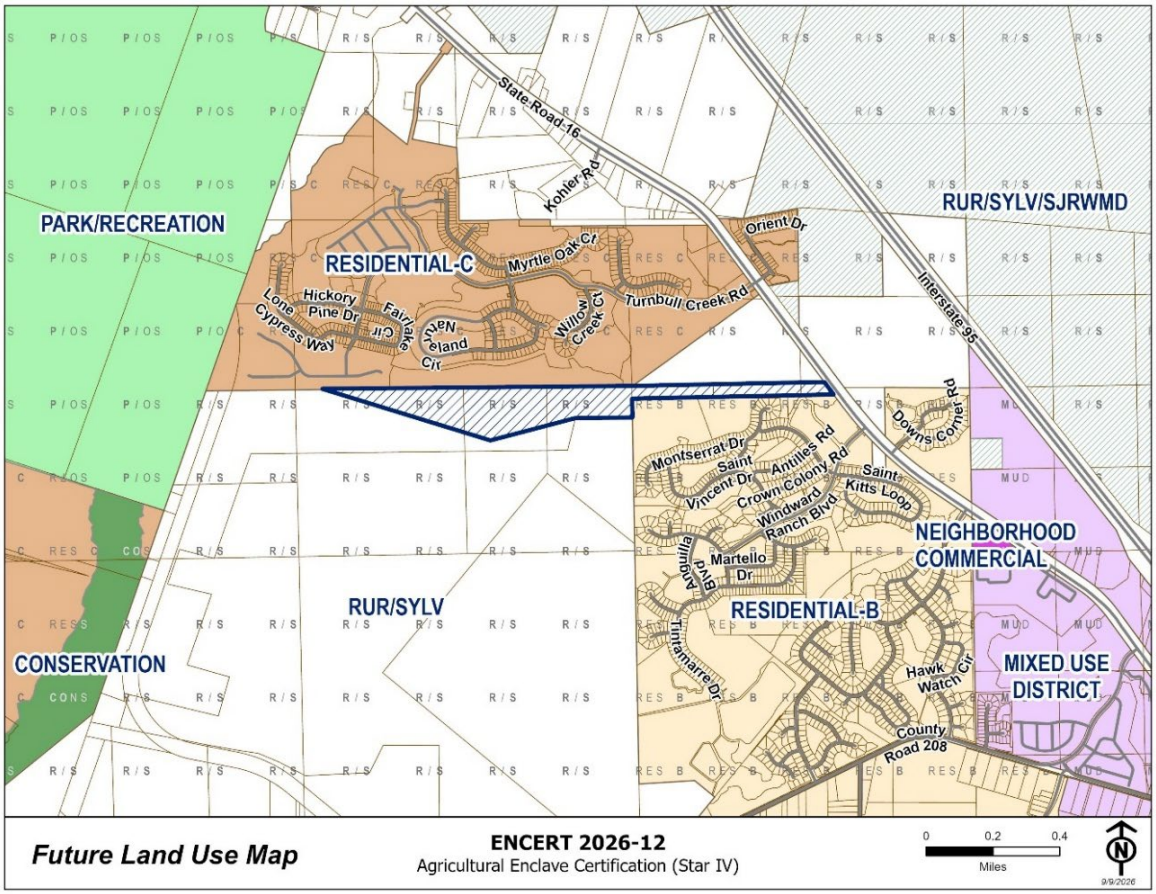
The Northwest Sector Overlay is an adopted planning area identified in the St. Johns County Comprehensive Plan for future growth and development and is supported by existing and planned public facilities and services. The development area boundary established by the county's future land use map functions as an urban service district as referenced in SB 686 and defined by 163.3164(53) F.S., "urban service area means areas identified in the comprehensive plan where public facilities and services, including but not limited central water and sewer capacity and roads, are already in place or are identified in the capital improvements elements. The term

includes and areas identified in the comprehensive plan as urban service areas, regardless of local government limitation". Additionally, the Property does have access to public services and willing to provide its proportionate share for services and facilities to serve the site.

Accordingly, the Property satisfies the intent and requirements of Section 163.3164(4)(C)3, and is eligible to be classified as an Agricultural Enclave. Specifically, the Property is located within an area that meets the statutory definition of an urban service area, shares more than 50 percent of its boundary with properties within the same district, and has access to existing or planned public infrastructure."

Staff review: The applicant seeks certification under section 163.3164(c)2., Florida Statutes. Although the applicant; subsequent narrative references 163.3164(c)3., the substance of the applicant's analysis and supporting materials addresses the criteria Section 163.3164(c)2. The application does not rely upon the rural study area contained in 163.3164(c)3. Staff has therefore evaluated the application under 163.3164(c)2.

Future Land Use Map (in part):



The subject property is below 700 acres, satisfying the limitation established by Section 163.3164(4)(c)2. The St. Johns County Future Land Use designates parcels surrounding the subject property's perimeter as *Residential-B* and *Residential-C*, with no adjacent parcels being designated as commercial or industrial. The applicant's survey identifies approximately 8,376.30 feet of the subject property's 16,731.20-foot perimeter as adjoining those residential future land use designations, or approximately 50.06%. Calculations as shown in the certified survey provided by the applicant

demonstrate that the proposed Agricultural Enclave's border exceeds the 50% threshold by 10.7 feet. Accordingly, while the calculation submitted by the Applicant reflects compliance with the 50% requirement, the Board should consider the limited margin and the supporting boundary information in determining whether the Applicant has sufficiently established compliance with section 163.3164(4)(c)2.

The Applicant relies on the County's Development Area and the Northwest Sector Overlay in support of the second requirement of section 163.3164(4)(c)2 as stated in their narrative. Section 163.3164(4)(c)2., Florida Statutes, requires that the parcel or parcels be surrounded on at least 50 percent of their perimeter by a parcel or parcels within an "*urban service district, area, or line.*"

Section 163.3164(57), Florida Statutes, states an *"urban service area" means as an areas identified in the comprehensive plan where public facilities and services, including, but not limited to central water and sewer capacity and roads, are already in place or are identified in the capital improvements element. The term includes any areas identified in the comprehensive plan as urban service areas, regardless of local government limitation.* The St. Johns County Comprehensive Plan establishes a Development Area and directs urban growth and development within that area. The Comprehensive Plan identifies the public facilities and services necessary to serve development within the Development Area, and the Capital Improvements Element identifies existing and planned public facilities and improvements necessary to accommodate such development. Although the Comprehensive Plan does not specifically designate the Development Area by the title "Urban Service Area," the statutory definition is based upon the identification of the area in the comprehensive plan and the provision or planning of the identified public facilities and services.

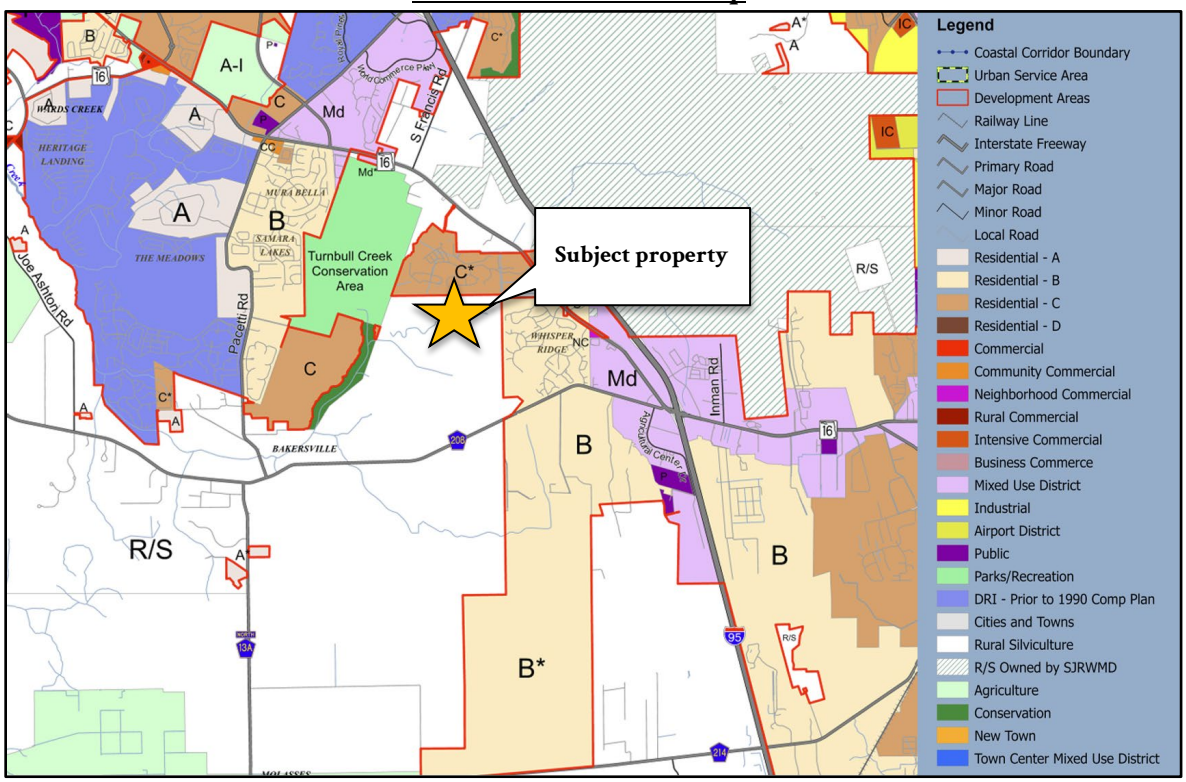
The ultimate determination of whether the applicable portion of the Development Area constitutes an "urban service district, area, or line" for purposes of section 163.3164(4)(c)2. is to be made by the Board based upon the Comprehensive Plan, Capital Improvements Element, evidence presented, and applicable statutory criteria. Some Commissioners have previously expressed the position that the County's Development Area does not satisfy the statutory definition of an urban service area. The foregoing information is provided to identify the applicable Comprehensive Plan provisions and factual circumstances for the Board's consideration.

While the Northwest Sector Overlay is a planning and zoning overlay and does not meet the statutory definition of an urban service area, the subject property does share 50.06% of its border with Development Areas. Planning staff's evaluation finds that the application appears to satisfy section 163.3164(4)(c)2., Florida Statutes, with at least 50 percent of the parcel's perimeter be surrounded by parcels designated on the Future Land Use Map for residential development and with qualifying parcels surrounded on at least 50 percent of their perimeter by parcels within an area satisfying the statutory definition of an urban service district.

On the following page, staff has included the 2050 Future Land Use map, in part, denoting the approximate location of the proposed Agricultural Enclave and highlighting its proximity to the Development Area boundary of adjacent parcels designated as Residential-B and Residential-C.

Finding: Based upon the application materials submitted and staff's review, the application **appears to demonstrate compliance with Section 163.3164(4)(c).**

2050 Future Land Use Map



D. Have public services, including water, wastewater, transportation, schools, and recreation facilities, available or such public services are scheduled in the capital improvement element to be provided by the local government or can be provided by an alternate provider of local government infrastructure in order to ensure consistency with applicable concurrency provisions of s. 163.3180, or the applicant offers to enter into a binding agreement to pay for, construct, or contribute land for its proportionate share of such improvements;

Applicant response: *"Section 163.3164(4)(3)(d) requires eligible properties to have adequate public facilities and services available to support development. The subject Property satisfies this criteria through the availability of existing and planned public infrastructure necessary to support the proposed development program.*

Significant public infrastructure investments have occurred within the surrounding area, further demonstrating the availability of public facilities and services. It is understood that potable water and sanitary sewer infrastructure exist along State Road 16 and St. Johns County has capacity to serve this Property. Additionally, as outlined in SB 686, The applicant will enter into a binding agreement to pay for, construct, or contribute land for its proportionate share of such improvements.

Collectively, the availability of existing utility services and the applicant's agreement to pay and contribute its proportionate share, the Property is located within an area capable of supporting the requirements of SB 686, thereby satisfying the eligibility criteria."

Staff review: At the time of writing this letter, staff has confirmed that there are no existing St. Johns County capital improvement projects which would provide access to the proposed parcel(s), however it appears that access could be provided via State Road 16. The Applicant has offered to enter into a

binding agreement to pay for, construct, or contribute land for its proportionate share of such improvements, as provided in Section 163.3164(4)(d), Florida Statutes.

Finding: Based upon the application materials submitted and staff's review, the application **appears to demonstrate compliance with Section 163.3164(4)(d).**

E. Not exceeding 1,280 acres; however, if the parcel or parcels are surrounded on at least 75 percent of their perimeter by existing or authorized residential development that will result in a density at buildout of at least 1,000 residents per square mile, the area must be determined to be urban and the parcel or parcels may not exceed 4,480 acres; and

Applicant response: *"Section 163.3164(4)(e) limits eligibility to properties containing no more than 1,280 acres unless additional statutory criteria are satisfied. The subject Property contains approximately 70.83+/- acres, which is well below the maximum acreage threshold. Accordingly, the Property meets the eligibility requirements of this section."*

Staff review: As previously stated, the subject property is approximately 70.83 acres meeting the requirement not to exceed 1,280 acres.

Finding: Based upon the application materials submitted and staff's review, the application **does demonstrate compliance with Section 163.3164(4)(e).**

F. Are located within a county with a population of 1.75 million or less.

Applicant response: *"Section 163.3164(4)(3)(f) requires that eligible properties be located within a county with a population of less than 1.75 million residents. Based on this requirement, only two counties in Florida are ineligible (Broward County and Miami-Dade County).*

St. Johns County is well below the statutory population threshold. According to the Bureau of Economic and Business Research (BEBR), St. Johns County had an estimated population of 348,336 residents in 2025. Accordingly, the subject Property satisfies the eligibility requirements."

Staff review: The applicant cites the Bureau of Economic and Business Research for St. Johns County population statistics, showing that the county meets the requirement with a population less than 1.75 million residents.

Finding: Based upon the application materials submitted and staff's review, the application **appears to demonstrate compliance with Section 163.3164(4)(f).**

CONCLUSION

Based upon the application materials submitted by the applicant and the information reviewed by County staff, the application **appears to satisfy the statutory definition of an agricultural enclave** contained in Section 163.3164(4), Florida Statutes, and the certification requirements of Section 163.3162(4)(a), Florida Statutes.

This report constitutes staff's preliminary evaluation required by Section 163.3162(4)(a), Florida Statutes. The Board of County Commissioners must conduct a public hearing and consider the application, this report, and

any additional evidence presented before determining whether the subject parcel satisfies the statutory definition of an agricultural enclave and whether certification should be approved or denied.

EXHIBIT

A. Supporting Documents

USA TODAY CO.

LocaliQ

PO Box 631244 Cincinnati, OH 45263-1244

AFFIDAVIT OF PUBLICATION

Casey Dendor
England Thims & Miller, Inc.
14775 Old Saint Augustine RD
Jacksonville FL 32258-2463

STATE OF WISCONSIN, COUNTY OF BROWN

Before the undersigned authority personally appeared, who on oath says that he or she is the Legal Coordinator of the St Augustine Record, published in St Johns County, Florida; that the attached copy of advertisement, being a , was published on the publicly accessible website of St Johns County, Florida, or in a newspaper by print in the issues of, on:

SAG St Augustine Record 10/05/2026

Affiant further says that the website or newspaper complies with all legal requirements for publication in chapter 50, Florida Statutes.
Subscribed and sworn to before me, by the legal clerk, who is personally known to me, on 10/05/2026

Legal Clerk

Notary, State of WI, County of Brown

8·25·30

My commission expires

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MARIAH VERHAGEN
Notary Public
State of Wisconsin

NOTICE OF A REQUEST FOR AGRICULTURAL ENCLAVE CERTIFICATION

NOTICE IS HEREBY GIVEN that a public hearing will be held on **10/20/2026 at 9:00 am,** or as soon thereafter as may be heard, before the Board of County Commissioners in the St. Johns County Auditorium located at 500 San Sebastian View, St. Augustine, Florida to determine whether an application complies with the statutory requirements for certification of the subject property as an Agricultural Enclave under Sections 163.3162 and 163.3164, Florida Statutes as amended by Chapter 2026-34, Laws of Florida. This certification request is identified as ENCERT 2026-12 Agricultural Enclave Certification (Star IV) and includes approximately 70.83 acres. The subject property is located West of State Road 16, south of the Grand Oaks development, and north of the Windward Ranch development. See attached map (Exhibit A).

This file and the proposed application are maintained in the Planning and Zoning Division of the Growth Management Department located at the St. Johns County Permit Center, 4040 Lewis Speedway, St. Augustine, Florida 32084 and may be inspected by interested parties prior to said public hearing. Items not heard by 6 pm shall automatically be continued until 9 am the following day, unless otherwise directed by the Board.

Interested parties may appear at the meeting and be heard with respect to the requested certification.

If a person decides to appeal any decision made with respect to any matter considered at such meeting or hearing, he or she will need a record of the proceedings, and for such purpose, he or she 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.

This matter is subject to court imposed quasi-judicial rules of procedure. Interested parties should limit contact with the Board of County Commissioners or the Planning and Zoning Agency members on this topic, except in compliance with Resolution 95-126, to properly noticed public hearings or to written communication, care of SJC Planning and Zoning Division, 4040 Lewis Speedway, St. Augustine, Florida, 32084.

NOTICE TO PERSONS NEEDING SPECIAL ACCOMMODATIONS AND TO ALL HEARING-IMPAIRED PERSONS: In accordance with the Americans with Disabilities Act, persons needing special accommodations or an interpreter to participate in this proceeding should contact the County's ADA Coordinator at (904) 209-0650 or at the St. Johns County Facilities Management, 2416 Dobbs Road, St. Augustine, FL 32086. Hearing impaired persons, call Florida Relay Service (1-800-955-8770), no later than 5 days prior to the meeting.

BOARD OF COUNTY COMMISSIONERS
ST. JOHNS COUNTY, FLORIDA
CLAY MURPHY, CHAIR
FILE NUMBER: ENCERT 2026-12
PROJECT NAME: Star IV

