

THE 1565 COALITION

SB 686 certification evidence inventory

St Johns County

Research under the byline of Justin Tahilramani

Expanded evidence inventory | Version 1.0

Record cutoff September 30 2026

Sixteen filings. Thirty review questions. One traceable record.

This companion to the Coalition research monograph distinguishes the enacted rule, evidence in official records, applicant and resident positions, staff findings, calculations, and independent research judgments. It contains no automated legal verdict and does not claim university approval, peer review or a doctoral credential.

Included	Extent
Detailed observations	129
Filing register	16 ENCERT application numbers
Requirement coverage	30 review questions across 16 filings; 480 matrix entries in workbook
Full selected packets	5 cases; 1,239 pages extracted or OCR processed
Packet versions acquired	9 PDFs across those same 5 cases
Full packets still not obtained	11 filings; dated portal triage only

The number of observations is not a number of failures. An issue may support certification, identify a clerical correction, raise a disputed interpretation, or document an access gap.

How to use this inventory

Read the decision summary first, then the detailed entries for the relevant application. Each entry identifies its review questions, evidence category, observed record, independent assessment, dependency group and the specific item that could resolve it. The workbook lets readers filter the same material; the unpublished site provides searchable cards with the same identifiers.

The source numbering continues the main report. PDF citations use one-based PDF page numbers, not a document's printed pagination. The source register provides official links. Statements from an applicant or objector retain that character even when included in an official agenda packet.

This review favors neither certification nor denial. It tests claims from proponents, opponents and county staff against the law and the records actually obtained. The Coalition's small-business and public-process perspective is disclosed in the main report's author chapter; this appendix does not add unverified credentials or biographical claims.

Reading order	Contents
1	Decision summary and limits of the all-filings count
2	Statutory review catalog and dependency rules
3	Shared issues applying across applications
4–8	North Palm, Heritage East, Heritage West, Sandy Creek, AFI
9	Eleven portal-only filings and access limits
10	Reproduced arithmetic and procedural chronology
11	Records needed and ready-to-use request text
12	Coverage, corrections, sources and audit method

1 Decision summary

The expanded record does not support saying that most of all sixteen applications failed one element, or that most failed several elements. Eleven complete packets remain unavailable to this research. Within the five packet-reviewed cases, North Palm presents multiple distinct substantive and interpretive questions; Sandy has two explicit preliminary staff deficiencies and additional unresolved issues. Heritage and AFI also require more detail than a one-issue summary conveys.

Four of the five reviewed staff evaluations were favorable; Sandy's was unfavorable. These are staff findings, not independent eligibility verdicts. At the cutoff, the reviewed record shows AFI approved, North Palm denied, Heritage East and West approvals reversed, and Sandy withdrawn. September 15 minutes are a draft submitted for October 6 approval; the Heritage September 28 disposition is supported by portal notes and procedural reporting, with final signed orders not obtained. [54–64]

ENCERT 2026 01 North Palm Valley Road

Independent assessment. Do not affirm certification on this record.

Several distinct material questions remain, especially undeveloped status, lawful subject unit, c 1 b method/classification and the enlarged-acreage residential showing. This supports withholding affirmative certification; it is not a judicial determination that every objection is correct or that no reconfigured case could qualify.

ENCERT 2026 05 Heritage East

Independent assessment. Do not affirm the broad request as presented.

Urban-service proof requires a defensible historical plan/facilities link. Commercial/industrial scope is not supported by staff's c 2 route. Single-family certification could be supportable with that scope and the other requirements established; agricultural and boundary evidence warrant explicit findings.

ENCERT 2026 06 Heritage West

Independent assessment. Do not affirm until material proof is reconciled.

The c 1 c urban-service basis is material. Reconcile perimeter arithmetic, proposed scope/density and incomplete notarial copy. The verified numerical discrepancy alone does not cause a 75% failure, and documentary defects may be curable.

ENCERT 2026 07 Sandy Creek

Independent assessment. Certification not established on reviewed record.

Two independent preliminary staff deficiencies—historical common control and continuous commercial agriculture—require resolution. Later supporting material deserves a full response; DAB basis is also disputed. Withdrawal prevents treating the staff letter as a final denial.

ENCERT 2026 08 AFI

Independent assessment. Strongest support for certification, with stated reservations.

Favorable staff findings, conservative frontage adjustments, ownership/agricultural evidence and recorded approval support AFI. Correct the route citation and independently reconcile credited common-element frontage, historic facts and approval terms before describing compliance as conclusively established.

These are reasoned present-record recommendations, not a claim that a court has adjudicated the disputed statutory readings. An application may have enough evidence for a legally defensible decision even when this

outside research cannot independently replicate every fact. Conversely, a favorable staff recommendation does not resolve a material contradiction simply by existing.

What would constitute an independent failure

An independent failure requires an applicable requirement, a defensible reading of that requirement, and established facts showing noncompliance. A missing document is an evidence gap. A blank notary block is a document-form issue. A disputed legal denominator is an interpretation question. A properly supported historical fact that cannot satisfy an applicable statutory gate is different from all three.

Family	Possible consequences	Counting rule
North Palm land unit	Acreage, perimeter, agriculture footprint and structure inclusion	Several consequences may depend on one boundary premise.
North Palm neighbor classification	Existing-development numerator and, in some settings, enlarged-acreage frontage	Different statutory tests must be evaluated; do not count one contested parcel several times as proven failures.
Heritage/Sandy DAB interpretation	Urban-service percentage and, for West, paragraph h development scope	Shared legal premise; a project-service offer does not resolve it.
Sandy historical control and agriculture	Two separately identified staff deficiencies	These are distinct requirements, but staff insufficiency is not proof no qualifying historical facts existed.
Document errors	Wrong subsection, ratio mismatch, incomplete notarial copy, impossible date	Assess materiality and correction; do not equate each error with substantive ineligibility.

2 Statutory review catalog

The thirty questions below form the workbook's coverage matrix. They include substantive eligibility, procedural obligations and one expressly labeled research recommendation. They are not thirty cumulative eligibility gates. Several are alternative routes; some apply only to enlarged acreage. A nonselected route is marked not required rather than failed. [3-7]

R01 Identify the same legal land unit

Authority. §163.3164(4), (40)

Apply all elements to the parcel or parcels presented; parcel of land includes a sufficiently described owner-designated or historically used unit.

Evidence. Legal description, historical boundary overlay, included and excluded portions, ownership and use footprint.

Limit. No express rule requires aggregation of every affiliated holding. Owner designation does not conclusively settle the January 1 2025 configuration question.

R02 Unincorporated location

Authority. §163.3164(4) opening

The subject land must be unincorporated.

Evidence. Jurisdiction map and annexation history at the qualifying date.

Limit. County address alone is not a municipal-boundary determination.

R03 Undeveloped subject land

Authority. §163.3164(4), (14); §380.04

The opening definition requires undeveloped land; development incorporates §380.04 and its exceptions.

Evidence. Dated imagery, building and occupancy records, actual improvements, plats, permitted versus completed work.

Limit. Agricultural classification does not itself establish undeveloped status; farming exceptions must be evaluated in context.

R04 Historical date and version

Authority. §163.3164(4) opening

The definition specifies January 1 2025. Evidence created later can prove earlier facts, but must connect to that date.

Evidence. Historical maps, ordinance effective dates, use history, title chain and dated images.

Limit. The introductory date and the five years before any amendment/application language must be reconciled expressly.

R05 Single ownership or control

Authority. §163.3164(4)(a)

One person or entity must own or control the subject parcels.

Evidence. Deeds and competent evidence of actual legal control, covering the whole unit at the statutory date.

Limit. Common officer titles can be relevant without conclusively proving control. A later intra-group transfer is not automatically disqualifying.

R06 Continuous five-year agricultural use

Authority. §163.3164(4)(b)

Continuous bona fide agricultural use must cover the prescribed five-year period before any comprehensive plan amendment or development application.

Evidence. Defined lookback dates, parcel-use chronology, prior applications and supporting operational records.

Limit. Annual timber harvest or profit is not stated as a statutory requirement. A new affidavit can establish history but cannot create history.

R07 Good-faith commercial agricultural purpose**Authority.** §163.3164(4)(b); §193.461(3)(b)

Bona fide agricultural purposes means good-faith commercial agricultural use; statutory factors guide the assessment.

Evidence. Classification history, commercial intent and operations, management, leases, practices and productive potential.**Limit.** The factors are not separate mandatory pass/fail elements. Absence of agricultural tax classification is not an express enclave disqualification.**R08 Existing-development route c 1 a****Authority.** §163.3164(4)(c)1.a

At least 75% of subject perimeter adjoins parcels with existing industrial, commercial or residential development.

Evidence. Segment lengths, adjacent parcels, qualifying actual uses and date.**Limit.** A mapped future use alone is insufficient. Unused alternative routes are not failures.**R09 Mapped-perimeter route c 1 b****Authority.** §163.3164(4)(c)1.b first condition

At least 75% of perimeter must adjoin parcels designated for specified uses on both zoning and future land use maps.

Evidence. Both historical map designations by segment and legally effective approvals.**Limit.** Cross-jurisdiction use of maps presents a disputed textual question in North Palm; generic entitlement potential is not the same as both maps.**R10 Existing-development component c 1 b****Authority.** §163.3164(4)(c)1.b second condition

At least 50% of such parcel or parcels is existing industrial, commercial or residential development.

Evidence. Express numerator, denominator, spatial unit and consistent development classification.**Limit.** The statute does not expressly restate 50% of subject perimeter here. Staff perimeter percentages require a stated interpretive basis.**R11 Interstate combination c 1 c****Authority.** §163.3164(4)(c)1.c

At least 75% of perimeter qualifies through an interstate plus parcels both in an urban service district/area/line and designated for specified FLUM uses.

Evidence. Separate interstate and other qualifying segment ledgers; urban service basis.**Limit.** No additional 50% existing-development test appears in this branch. Interstate adjacency alone does not satisfy the combination.**R12 700-acre gate c 2****Authority.** §163.3164(4)(c)2

The c 2 alternative requires no more than 700 acres.

Evidence. Acreage of the legally valid subject unit.**Limit.** The ordinary 1,280-acre limit does not expand the 700-acre c 2 ceiling.**R13 FLUM perimeter c 2****Authority.** §163.3164(4)(c)2 first perimeter test

At least 50% of perimeter must adjoin parcels designated for industrial, commercial or residential uses on the FLUM.

Evidence. Segment ledger and historical FLUM designations.**Limit.** Public designation does not automatically qualify. Zoning and existing development are not additional conditions of this particular test.

R14 Urban-service perimeter c 2

Authority. §163.3164(4)(c)2 second perimeter test; (57)

At least 50% of perimeter must adjoin parcels within an urban service district, area or line. Urban service area has a statutory definition.

Evidence. Plan identification, facilities/capacity/roads in place or CIE evidence, or express plan designation; segment mapping.

Limit. Utility territory and Development Area Boundary labels alone do not necessarily establish the definition. The two c 2 segment sets need not expressly coincide.

R15 Adopted rural study area c 3

Authority. §163.3164(4)(c)3

Alternative eligibility exists inside an established rural study area adopted in the comprehensive plan and intended for residential development.

Evidence. Adopting instrument, effective date, area boundary and intended uses.

Limit. No numeric perimeter percentage is stated in this alternative; all other applicable elements remain.

R16 Across-road or water adjacency

Authority. Final sentence §163.3164(4)

Where a right-of-way, body of water or canal is on the perimeter, use adjacent parcels across that feature.

Evidence. Original boundary, feature boundaries, opposite parcels, projection method and no double counting.

Limit. No express width limit or recursive-jump algorithm. This rule does not expressly permit skipping ordinary intervening private land.

R17 Ordinary acreage ceiling

Authority. §163.3164(4)(e)

Ordinarily the unit may not exceed 1,280 acres.

Evidence. One reconciled acreage and legally justified exclusions.

Limit. Gross parcel acreage and density denominator are different questions.

R18 Expanded acreage residential perimeter

Authority. §163.3164(4)(e)

Above 1,280 and up to 4,480 acres requires at least 75% perimeter with existing or authorized residential development.

Evidence. Residential-only qualifying frontage and authorizing instruments.

Limit. Commercial frontage that qualifies under c 1 b may fail this separate residential-only test.

R19 Expanded acreage buildout density

Authority. §163.3164(4)(e)

Qualifying residential development must result in at least 1,000 residents per square mile at buildout; area is then determined urban.

Evidence. Authorized units, geographic denominator, household/population assumptions and calculation.

Limit. Residents are not dwelling units; PUD-wide average versus directly adjacent parcels needs explanation.

R20 Expanded acreage water-plan exclusion

Authority. §163.3164(4)(e); §373.4595(4)(c)

The enlarged ceiling is unavailable in affected counties covered by the referenced water protection plan.

Evidence. Match location to the cross-referenced plan and affected counties.

Limit. Not a blanket prohibition on every enclave with wetlands or any county with a water plan.

R21 County population**Authority.** §163.3164(4)(f); §186.901

County population may not exceed 1.75 million using the most recent official estimate.

Evidence. Official EDR estimate and applicable date.**Limit.** Census counts, projections and neighboring-county population are not substitutes for the specified measure.**R22 Public-services alternative****Authority.** §163.3164(4)(d); §163.3180

Services may be available, scheduled in CIE, supplied by alternative provider, or covered by an offer to enter a binding proportionate-share agreement.

Evidence. Identify relied-on alternative and water, wastewater, transport, school and recreation evidence or offer.**Limit.** An executed agreement and completed facilities are not universally demanded at certification. The offer does not prove the separate urban-service perimeter test.**R23 Adjacent density comparison****Authority.** §163.3162(4)(a), (e)

An adjacent parcel or development must permit the same or higher density than proposed; subsequent plans must meet the statutory adjacent-use standard.

Evidence. Actual proposal, gross/net units, comparator boundaries, permissions and restrictions.**Limit.** A staff maximum is not automatically the requested proposal or a guaranteed unit count.**R24 No certified-enclave chaining****Authority.** §163.3162(4)(a)

An applicant may not use the perimeter of another locally certified enclave to meet the definition.

Evidence. Adjacent certification register and boundary chronology.**Limit.** Common ownership alone is not this prohibition. Side-by-side proposed enclaves do not automatically prove prohibited chaining.**R25 Development use and intensity scope****Authority.** §163.3162(4)(e), (h)

Ordinary plans concern single-family housing; interstate-adjacent c 1 c certification can support commercial, industrial or single-family uses with qualifying adjacent density/intensity.

Evidence. Selected route and explicit proposed use/intensity with lawful adjacent comparator.**Limit.** A c 2 certification does not acquire paragraph h merely because an interstate is nearby; broad mixed-use language needs narrowing or separate justification.**R26 Preserved protections****Authority.** §163.3162(4)(i)

Listed protections, including recorded conservation easements, remain effective.

Evidence. Recorded instruments, boundaries and relevant protected-area overlap.**Limit.** A conservation easement is not itself a universal certification bar; certification does not erase it or authorize prohibited construction.**R27 Receipt and written report****Authority.** §163.3162(4)(b)

Written compliance report within 30 days after receipt.

Evidence. Timestamped receipt, report and transmission records, fee records and any claimed tolling basis.**Limit.** Statute does not expressly say the clock begins only on payment. Portal issue date is not necessarily legal receipt.

R28 Hearing and 90-day disposition

Authority. §163.3162(4)(c)

Hearing within 30 days after report; failure to approve or deny within 90 days after receipt triggers certification.

Evidence. Report delivery, hearings, continuances, withdrawal and decision dates.

Limit. A missed intermediate deadline is not textually identical to the 90-day automatic-certification trigger.

R29 Order and review record

Authority. §163.3162(4)(d)

Denial requires written detailed findings and legal conclusions; certiorari petition deadline runs from rendition.

Evidence. Signed order, rendition, clerk docket and complete hearing record.

Limit. Minutes or news of a vote are not the signed order; do not calculate an appeal deadline from incomplete records.

R30 Reproducible and fair record

Authority. Research recommendation; statutory decision framework

Publish criterion-specific evidence and give consistent reasons for disputed classifications.

Evidence. Segment spreadsheet, exhibits, staff calculations, competing submissions, evidence and findings.

Limit. Recommended audit practice, not an extra substantive eligibility requirement imposed by this report.

3 Shared statutory and record issues

These entries supply the rules of analysis used in every case. They should be read with the case-specific findings rather than counted as additional failures for each application.

G-01 Same unit and date for every element

Disputed interpretation | Textual interpretation

Record. The statute defines parcel of land broadly in (40), while the enclave opening fixes January 1 2025. North Palm objects to carving portions from tax parcels; Heritage legal descriptions also contain express exclusions. [4;54, pp.770–772;55–56, pp.36–37]

Assessment. Neither every tax parcel must always be included nor any owner-drawn subset always qualifies is established by the text. Map title, use, acreage and perimeter to one proposed unit, with an explicit temporal interpretation.

What resolves it. Historical overlay and written unit-of-land interpretation, applying both provisions.

Relationship. Requirements R01, R04 | Dependency UNIT | Potentially material

Correction or remaining obstacle. Depends on historical facts and legal interpretation

[4, §163.3164(4),(40);54, pp.770–772]

G-02 Use development consistently but preserve context

Disputed interpretation | Textual interpretation

Record. Development incorporates §380.04, including land division and associated improvements, with agricultural and other exceptions. Neighboring conservation/common-element parcels and on-site homes raise different factual settings.

Assessment. Counting every platted lot as existing residential development is not self-proving; requiring a house on every qualifying neighboring parcel also goes beyond the text. Identify actual qualifying use and legal reasoning for each class.

What resolves it. A published classification protocol and parcel-level facts dated to January 1 2025.

Relationship. Requirements R03, R08, R10 | Dependency DEVELOPMENT | Potentially material

Correction or remaining obstacle. Additional proof or explanation may resolve

[4, (4),(14);6, §380.04(1)–(4)]

G-03 Tax classification is evidence with a defined statutory role

Evidence caution | Textual and evidence assessment

Record. SB 686 expressly incorporates §193.461 bona fide agricultural purposes. Heritage says classification is per se affirmation; staff accepted classification history. Sandy staff correctly says absence of classification is not dispositive.

Assessment. Do not treat classification as irrelevant; it can be strong official evidence. Also distinguish the assessed acreage, actual agricultural use, continuity and undeveloped status. No statutory sentence expressly makes the tax label conclusive on every enclave condition.

What resolves it. Classification history and supporting application files matched to the proposed unit and period.

Relationship. Requirements R06, R07 | Dependency AG | Potentially material

Correction or remaining obstacle. Additional proof or explanation may resolve

[4, (4)(b);5, (3)(b)–(d);55–56, pp.8–9,18–19;57, pp.8–9]

G-04 Agricultural factors are not seven independent gates

Supported textual distinction | Textual interpretation

Record. Section 193.461 lists considerations for good-faith commercial agriculture; forestry can involve growth periods without harvest. Several applicant submissions argue from cases.

Assessment. An unanswered factor or no annual sales is not automatically a separate statutory failure. A management plan supports commercial intent but is not proof every promised activity occurred. Unverified quotations from counsel or residents are not treated as holdings.

What resolves it. Operational chronology, dated observations and original legal authorities where actually necessary.

Relationship. Requirements R06, R07 | Dependency AG | Prevents false failure counts

Correction or remaining obstacle. Additional proof or explanation may resolve

[5, §193.461(3)(b);54, pp.248–264;57, pp.125–144]

G-05 Sheik Island opinion has limited analogical value

Primary authority distinguished | Primary opinion and qualified analogy

Record. Official appellate opinion says agricultural classification was not dispositive of farm/farm-operation status for the Right to Farm Act and was only part of the \$604.50 inquiry. Heritage cites the case in its classification argument.

Assessment. This is not a holding under SB 686. SB 686 expressly cross-references §193.461, so a direct transplant from a differently worded statute would be unsound. The opinion nevertheless cautions against substituting one tax determination for every element of a different statute.

What resolves it. Use the actual statutory comparison; do not describe Sheik as an enclave precedent.

Relationship. Requirements R07 | Dependency AG | Limits asserted precedent

Correction or remaining obstacle. Additional proof or explanation may resolve

[67, PDF pp.14,16;55–56, p.18;4, (4)(b)]

G-06 Keep urban-service adjacency separate from project services

Disputed interpretation | Textual interpretation

Record. Section 163.3164(57) defines urban service area. Paragraph (4)(d) separately allows an offer to fund services. Heritage and Sandy rely on DAB adjacency and service offers.

Assessment. An offer can satisfy paragraph d without proving adjacent parcels are inside a qualifying urban service area. Conversely an existing-services basis can satisfy the definition without a new CIE project. Staff interpretation is visible; a waiver is not proved.

What resolves it. Plan designation and facilities/CIE evidence for the counted adjacent parcels; separate finding on subject-project services.

Relationship. Requirements R11, R14, R22 | Dependency USA | Potentially material

Correction or remaining obstacle. Additional proof or explanation may resolve

[4, (4)(c),(d),(57);55–57, staff reports]

G-07 DAB evidence is supportive but requires a functional link

Disputed interpretation | Balanced interpretation

Record. 2025 policies A.1.2.7, D.1.1.5 and D.4.1.2 direct growth and utility service within Development Areas. D.1.1.6 and D.4.1.3 address future utility-service-area regulation. Staff invokes Objective A.1.2 and CIE.

Assessment. These support the county position that DAB has an urban-service function. General service direction does not alone identify actual capacity, roads, or a CIE entry for every counted area. The functional definition should be applied to evidence, not merely to a label.

What resolves it. Relevant adopted plan/map version, express designation if any, facilities and dated capacity, or actual CIE schedule entries.

Relationship. Requirements R04, R14 | Dependency USA | Potentially material

Correction or remaining obstacle. Additional proof or explanation may resolve

[14, A.1.2.7-9;65, PDF pp.1-2,28;4, (57);55-57, staff analyses]

G-08 Do not cross-apply 2025 and 2050 policy numbers

Document version issue | Verified document comparison

Record. 2025 D.1.1.5 concerns sanitary sewer and D.4.1.2 potable water. In posted 2050 text D.1.1.5 covers both; D.4.1.2 addresses stormwater protection of aquifer recharge.

Assessment. Both versions were retrieved; neither posting alone proves which adopted version governed January 1 2025 or a 2026 determination. Heritage reverses the respective water/sewer order in its prose, but both subjects exist in the cited 2025 policies. That drafting error is not itself a merits failure.

What resolves it. Adopting ordinances, effective dates, historical text and maps.

Relationship. Requirements R04, R14 | Dependency USA | Material to citation accuracy

Correction or remaining obstacle. Additional proof or explanation may resolve

[65, pp.1-2,28;66, pp.3,25;55-56, p.20]

G-09 The c 1 b denominator is not explicitly a second subject-perimeter test

Disputed interpretation | Textual interpretation

Record. The first clause says 75% of their perimeter. The second says at least 50% of such parcel or parcels is existing development. North Palm staff reports 50.72% of subject perimeter.

Assessment. A reproducible perimeter calculation is necessary to audit staff's chosen method but does not establish that method is legally correct. An area-based reading, parcel-based reading and frontage-based reading should be evaluated against the enacted words; this report does not adopt an invented statutory algorithm.

What resolves it. County's stated denominator rationale and calculations under legally plausible alternatives.

Relationship. Requirements R09, R10 | Dependency C1 B | Potentially material

Correction or remaining obstacle. Additional proof or explanation may resolve

[4, (4)(c)1.b;13, §42.02(C)(2);54, p.10]

G-10 Crossing is required in specified settings, not unlimited

Supported text with unresolved geometry | Textual interpretation

Record. The final statutory sentence expressly names right-of-way, body of water and canal; it states no maximum distance.

Assessment. A river or highway cannot be rejected just because it separates parcels. The rule does not expressly allow serial jumps over ordinary intervening land, nor prescribe projections, bends, islands or double counting. Internal roads also require defining the subject unit before measuring its outer perimeter.

What resolves it. Document feature, opposite parcel, projection, internal/external status and counted length.

Relationship. Requirements R16 | Dependency GEOMETRY | Potentially material

Correction or remaining obstacle. Additional proof or explanation may resolve

[4, final sentence (4);6, §380.04]

G-11 Density comparison needs compatible units and actual permissions

Evidence caution | Analytical rule

Record. Portal notes sometimes label a neighboring maximum the statutory maximum while stating no applicant density. Heritage compares 13 units with a 13-per-net-acre designation; AFI states 1.08 gross.

Assessment. A higher numeric value on a different gross/net base does not prove the proposed yield is allowed. General FLUM categories may have controlling text/PUD restrictions. A pending or corrected proposal must be separated from an earlier note.

What resolves it. Actual proposed units, net/gross definitions, adjacent permissible yield and operative limitations.

Relationship. Requirements R23, R25 | Dependency DENSITY | Potentially material

Correction or remaining obstacle. Additional proof or explanation may resolve

[3, (4)(a),(e),(h);55–58, density tables;72–87, portal notes]

G-12 Receipt, fee payment and deadline must be separately recorded

Procedural question | Procedure and textual interpretation

Record. The law uses receipt. Entrada’s August 12 note says review will not start until payment; August 13 note starts the clock that day after payment August 12. September records likewise key review to fee payment.

Assessment. No express fee-tolling clause was found in §163.3162(4). This discrepancy warrants legal explanation; it is not proof a specific application was automatically certified. Initial receipt, completeness, withdrawal and timely action still require records.

What resolves it. Timestamped application, payment, receipt acknowledgment, report transmission and any lawful tolling instrument.

Relationship. Requirements R27, R28 | Dependency CLOCK | Potentially material

Correction or remaining obstacle. Additional proof or explanation may resolve

[3, (4)(b)–(c);80, notes August 12–13;81–83, September notes]

G-13 Staff report, board vote and merits are different findings

Supported record distinction | Record synthesis

Record. Four of five packet cases had favorable staff evaluations; Sandy had two explicit preliminary deficiencies. AFI was approved; North Palm denied; Heritage approvals were later reversed; Sandy withdrew.

Assessment. Those are procedural and staff counts, not a count of independently proven eligible applications. Detailed written findings are expressly required for denial; a report recommendation is not the board’s adjudication. No categorical staff waiver or misconduct is established by this inventory.

What resolves it. Signed orders, complete hearing exhibits, audio/transcript and court docket where relevant.

Relationship. Requirements R29, R30 | Dependency PROCESS | Prevents unsupported conclusions

Correction or remaining obstacle. Additional proof or explanation may resolve

[3, (4)(c)–(d);54–64]

G-14 Acquisition is not authentication or complete visual review

Coverage limitation | Research limitation

Record. Five selected packet PDFs contain 1,239 pages; all received native-text extraction or OCR, with selected decisive pages visually checked. Nine packet versions were acquired across those five cases. Eleven other filings have portal records without full packets in this research set.

Assessment. OCR and page catalog support a traceable review but can miss signatures, handwritten notes and geometry. A complete PDF can omit later hearing submissions. No total eligible/failed count for all sixteen is defensible from this coverage.

What resolves it. Complete certified record and GIS/title/capacity verification; preserve each version and hash.

Relationship. Requirements R30 | Dependency COVERAGE | Limits universe of conclusions

Correction or remaining obstacle. Obtain missing records and authenticate critical exhibits

[53-64;69-71; research page coverage manifest]

4 North Palm Valley Road

ENCERT 2026 01 | 4462.09 reported acres | Reviewed route c 1 b and expanded acreage

Independent assessment. Do not affirm certification on this record

Several distinct material questions remain, especially undeveloped status, lawful subject unit, c 1 b method/classification and the enlarged-acreage residential showing. This supports withholding affirmative certification; it is not a judicial determination that every objection is correct or that no reconfigured case could qualify.

Procedural status: Denied. Staff: Favorable. These labels are not substitutes for the individual findings below.

E01-01 Submitted acreage versus whole source parcels

Disputed interpretation | Evidence assessment

Record. Applicant presents 4,462.09 acres. Objector supplies a 4,568.95-acre whole-parcel scenario and identifies portions removed at the north/west. Staff accepted the submitted unit.

Assessment. The submitted figure is 17.91 acres below 4,480. The objector scenario would be 88.95 above it, if both its geometry and whole-parcel legal premise are correct. §163.3164(40) gives the applicant a substantial contrary argument. Neither scenario is independently surveyed here.

What resolves it. Historical parcel/unit overlay; legal basis and date for exclusions; reconciled acreage signed by the responsible professional.

Relationship. Requirements R01, R17, R18 | Dependency NP-UNIT | Potentially material

Correction or remaining obstacle. Historical/legal issue; revision may change perimeter and require a different application

[54, pp.20–124,157,770–772,834–837;4, (4),(40)]

E01-02 Existing residences within listed source parcels

Potential substantive obstacle | Evidence assessment

Record. Submitted property records and objections identify two residences on 067310-0000 and one on 067320-0000, with separately assessed residential acreage. Staff's favorable summary does not give a detailed undeveloped finding addressing each structure.

Assessment. If nonexempt residential development was inside the actual subject unit on January 1 2025, the opening undeveloped requirement is a serious independent obstacle. Agricultural tax treatment can coexist with a dwelling and therefore does not resolve it. Confirm actual inclusion and the applicable §380.04 exception before declaring failure.

What resolves it. Map each residence/curtilage against the exact certification description and date; identify legal treatment of each use.

Relationship. Requirements R03 | Dependency NP-DEVELOPED | Potentially material

Correction or remaining obstacle. Existing historical development cannot be erased by a new affidavit; boundary or legal classification may change result

[54, submitted tax cards pp.159–245; objections pp.771,796,808–809;4, (4),(14);5, (3)(c)–(d);6]

E01-03 Ownership before the 2025 transfer

Staff-supported | Evidence assessment

Record. Ownership affidavit, conversion documents and July 2025 deed link Estuary to BR4700; staff found Estuary owned or controlled the property as of January 1 2025.

Assessment. BR4700's later formation is not by itself disqualifying because the statute permits ownership or control. The required historical proposition is common control/ownership of the subject land, not the same named titleholder forever.

What resolves it. Reconcile all title exceptions and acquisition instruments with the exact proposed unit; no contrary single-control fact is established here.

Relationship. Requirements R05 | Dependency NP-TITLE | Supports eligibility subject to unit reconciliation

Correction or remaining obstacle. Additional proof or explanation may resolve

[54, pp.9,126–152;4, (4)(a)]

E01-04 Title chain and parcel list need a complete crosswalk

Evidence reconciliation | Evidence assessment

Record. The title report lists encumbrances and the packet contains older deeds; an objector identifies O.R.2597/1931 in addition to the 1994 trustee deed invoked in the affidavit.

Assessment. A chain discrepancy question is not proof ownership was divided. The evidence should show how each included portion reaches the historic owner and current applicant, with no assumption that a tax list equals title.

What resolves it. Parcel-to-deed schedule and explanation of later instruments identified in title report.

Relationship. Requirements R05 | Dependency NP-TITLE | Potentially material if chain does not cover the unit

Correction or remaining obstacle. Additional proof or explanation may resolve

[54, pp.127–152,783]

E01-05 Substantial agricultural evidence exists

Staff-supported | Evidence assessment

Record. Property Appraiser letter says listed parcels received agricultural classification for at least five years; affidavits, timber sales summary and two February 2020 management plans add operational evidence.

Assessment. It would be inaccurate to say North Palm supplied only a tax label. The evidence supports commercial silviculture, while geographic allocation and the precise period remain separate questions. Annual gaps in harvest alone are not disqualifying.

What resolves it. Preserve source records and reconcile them to the certification unit and five-year dates.

Relationship. Requirements R06, R07 | Dependency NP-AG | Supports eligibility with unresolved footprint

Correction or remaining obstacle. Additional proof or explanation may resolve

[54, pp.154–157,246–264;5, (3)(b)]

E01-06 Forestry footprint and historical operations

Evidence insufficient for independent confirmation | Evidence assessment

Record. Management plans describe 2,472-acre and 2,255-acre tracts; listed parcels overlap and differ from the proposed 4,462.09-acre unit. Sales are not allocated to each included portion.

Assessment. Do not add the plans' acreage and call the excess noncompliance: overlap can explain totals. The proper unresolved question is whether the actual included land remained in bona fide commercial use throughout the relevant period, including wetland/conservation areas and homesites.

What resolves it. GIS overlay of plan stands, agricultural assessments, activities and excluded portions; updated plan and explanation of nonharvest years.

Relationship. Requirements R06, R07 | Dependency NP-AG | Potentially material

Correction or remaining obstacle. Documentary cure if historical use existed; new future activity cannot cure missing historical use

[54, pp.246–264,775,782;4, (4)(b);5]

E01-07 Five-year period and earlier applications

Unresolved temporal issue | Textual and record issue

Record. Applicant affidavit says no comprehensive plan amendment or development permit application related to the subject property was filed during the preceding five years. Objectors question differing periods and neighboring entitlement history.

Assessment. An application on neighboring Duval land is not automatically an application on this subject unit. The phrase before any comprehensive plan amendment or development application still requires identifying relevant subject-land filings and reconciling the January 2025 opening.

What resolves it. Subject-land application chronology, defined statutory lookback and consistent staff explanation.

Relationship. Requirements R04, R06 | Dependency NP-AG | Potentially material

Correction or remaining obstacle. Additional proof or explanation may resolve

[54, pp.154–155,773–775;4, (4) opening and (b)]

E01-08 Mapped frontage depends substantially on Jacksonville land

Disputed interpretation | Competing legal interpretations

Record. Staff counts both FLUM and zoning on west-side Jacksonville/Duval parcels and reports 84.53% mapped frontage. Objector argues the local government means the certifying county; applicant says cross-jurisdiction adjacency is not prohibited.

Assessment. The statute defines local government as any county or municipality and does not expressly bar cross-border adjacency. Repeated use of the local government supplies a contrary textual argument. The west segment is material; excluding it leaves about 50.88% on applicant inputs. This is not settled law.

What resolves it. Written construction of the phrase and operative neighboring ordinances/map boundaries.

Relationship. Requirements R09 | Dependency NP-WEST | Potentially material

Correction or remaining obstacle. Legal resolution plus valid historical designation

[54, pp.10,269–281,772;4, (4)(c)1.b,(31)]

E01-09 Later map dates do not automatically prove historic designations

Evidence gap | Evidence assessment

Record. Applicant FLUM table cites an SJC map amended December 5 2025; zoning support includes a March 2026 map. Jacksonville ordinances are numbered 2024.

Assessment. Later maps can accurately show earlier conditions, but that connection requires version comparison or ordinance history. Treating the date mismatch as conclusive failure would overstate it; ignoring the historical requirement would understate it.

What resolves it. Certified January 1 2025 layers or evidence that qualifying designations were unchanged, and effective dates of neighboring approvals.

Relationship. Requirements R04, R09 | Dependency NP-DATE | Potentially material

Correction or remaining obstacle. Historical records may cure proof gap

[54, p.270, zoning exhibits pp.275–281,773–774;4, (4)]

E01-10 Staff and applicant existing-development percentages differ

Document inconsistency | Verified arithmetic and record comparison

Record. Applicant lengths are 29,595.54 existing feet out of 58,166.76, about 50.8805%. Staff reports 50.72% without a comparable published segment ledger in the reviewed report.

Assessment. Both exceed 50 under a frontage approach. Difference matters because the margin is small, but is not proof either is wrong. The c 1 b denominator issue remains even after arithmetic is reconciled.

What resolves it. Staff total/numerator and GIS segments, full precision, source date and method; reconcile with applicant.

Relationship. Requirements R10 | Dependency NP-C1 B | Potentially material

Correction or remaining obstacle. Additional proof or explanation may resolve

[54, p.10, existing-development exhibits pp.282-289,781,812-813;4, (4)(c)1.b]

E01-11 Nine opposite-shore parcels and the narrow margin

Material classification dispute | Objector allegation and conditional calculation

Record. Resident submissions identify nine vacant-classified parcels across the ICW; one estimates about 1,258.6 aligned feet, another uses about 1,285. The applicant credits the eastern span. Some shoreline features may exist.

Assessment. These are resident measurements, not independent survey findings. If 750 feet were wrongly credited, applicant percentage becomes about 49.5911%; if 1,285, about 48.6713%. That sensitivity demonstrates materiality only. A vacant tax code does not conclusively negate qualifying development.

What resolves it. Professional alignment ledger, January 2025 improvements/use and reasons for crediting or excluding each opposite parcel.

Relationship. Requirements R10, R16 | Dependency NP-EAST | Potentially material

Correction or remaining obstacle. Additional proof or explanation may resolve

[54, pp.679-685,697-711,793-802,810-813;4;6]

E01-12 Southern common and conservation parcels

Material classification dispute | Competing factual and legal readings

Record. Objectors identify separately platted HOA/common tracts along much of the south boundary; applicant treats the Nocatee development as residential context.

Assessment. Section 380.04 can include associated construction and land division; it does not expressly convert all vacant conservation parcels into existing residential development. A functional residential-development argument deserves evaluation, but not automatic acceptance. This same approach must be applied consistently to AFI.

What resolves it. Parcel-specific plats, actual improvements, use and legal classification, with segment calculations.

Relationship. Requirements R10 | Dependency NP-SOUTH | Potentially material

Correction or remaining obstacle. Additional proof or explanation may resolve

[54, pp.282-289,679-696,768-769;4, (4)(c)1.b,(14);6]

E01-13 ICW crossing is expressly contemplated

Supported statutory rule | Textual application

Record. The eastern boundary runs along the Intracoastal Waterway. Staff applies the across-water sentence to parcels on the opposite side.

Assessment. Crossing water is not itself a defect. The live questions are which parcels are opposite, how their frontage is projected, what they contained on the historic date and whether ordinary land was skipped.

What resolves it. Reproducible shoreline/projection method, especially bends and nonparallel boundaries.

Relationship. Requirements R16 | Dependency NP-EAST | Rejects unsupported water-barrier objection

Correction or remaining obstacle. Additional proof or explanation may resolve

[54, p.10;4, final sentence (4)]

E01-14 Expanded-acreage test must use residential frontage

Evidence and interpretation gap | Evidence assessment

Record. Applicant supplies 49,101.27 feet of east/south/west frontage. Staff repeats 84.53% for expanded acreage; its adjacency table includes some commercial classifications.

Assessment. Passing c 1 b's industrial/commercial/residential map test does not necessarily pass paragraph e's residential-only test. Mixed-use parcels may authorize residential use; do not simply remove the entire mixed-use district. Identify actual residential authorization for every counted class.

What resolves it. Separate residential eligibility ledger with associated authorizations and dates.

Relationship. Requirements R18 | Dependency NP-EXPANDED | Potentially material

Correction or remaining obstacle. Evidence/legal resolution; if qualifying frontage is under 75%, this acreage fails the enlarged route

[54, pp.7,12,300–304,774–775;4, (4)(e)]

E01-15 Buildout densities rely on assumptions and area selection

Applicant calculation with unresolved scope | Applicant model assessed

Record. Applicant derives east 1,760, south 1,811 and west 1,523 residents per square mile using 2.75/2.59 persons per household and authorized units averaged over larger areas/PUDs.

Assessment. These are derived buildout estimates, not counts of existing residents. The applicant explains sources; remaining questions are the lawful geographic unit, operative authorization and whether directly surrounding residential development is represented. Rounding differences do not erase margins above 1,000.

What resolves it. Unrounded calculations, legal density denominators, household assumptions and segment-to-development match.

Relationship. Requirements R19 | Dependency NP-EXPANDED | Potentially material

Correction or remaining obstacle. Additional proof or explanation may resolve

[54, pp.300–303;4, (4)(e)]

E01-16 Western authorization and conditions precedent

Evidence gap | Legal and historical question

Record. Packet includes Jacksonville comprehensive plan/PUD materials. Objector points to required conceptual master plan approval before development and asks whether western residential buildout was actually authorized by January 2025.

Assessment. A conditional entitlement can differ from permission to build immediately. The statute says existing or authorized residential development, not necessarily fully constructed or permit-ready. Determine what legal authorization existed, rather than equating every remaining approval with nonauthorization.

What resolves it. Final ordinances, effective/compliance notices, conceptual plan status and approved residential boundaries at cutoff date.

Relationship. Requirements R04, R18, R19 | Dependency NP-WEST | Potentially material

Correction or remaining obstacle. Additional proof or explanation may resolve

[54, pp.300–303, appendix to Exhibit 10,774;4, (4)(e)]

E01-17 Other size and geographic gates

Supported subject to expanded route | Evidence assessment

Record. 4,462.09 is below 4,480 but above 1,280. EDR estimate for SJC is 348,336. SJC is not one of the counties identified by the referenced Northern Everglades water protection provision.

Assessment. Population and the specific water-plan exclusion do not appear to block this filing. The enlarged acreage benefit still depends on valid unit, residential perimeter and buildout showing.

What resolves it. Keep official estimate and statutory geographic cross-reference in the order; no new population study needed for this cutoff.

Relationship. Requirements R17, R20, R21 | Dependency NP-EXPANDED | Supports geographic eligibility

Correction or remaining obstacle. Additional proof or explanation may resolve

[54, p.12;4, (4)(e)-(f);10;52, §373.4595(4)(c)]

E01-18 Service offer is an express route, not a staff waiver

Staff-supported | Evidence assessment

Record. Staff says all facilities are not presently available; applicant offers binding proportionate-share agreements for transport/recreation, schools and water/wastewater and supplies a JEA capacity letter.

Assessment. The enacted disjunction expressly permits an offer. Lack of completed facilities or executed agreements alone therefore does not prove noncompliance. The contents, coverage and subsequent enforceability still need clear findings.

What resolves it. Identify offers accepted as paragraph d evidence, authority of signatories and service categories.

Relationship. Requirements R22 | Dependency NP-SERVICES | Supports selected statutory alternative

Correction or remaining obstacle. Additional proof or explanation may resolve

[54, pp.11-12, Exhibit 9;4, (4)(d)]

E01-19 One gross unit versus larger potential yield

Scope and comparison issue | Scope analysis

Record. Applicant represents up to 1.0 dwelling unit per gross acre; staff refers to neighboring New Town density and a much larger theoretical potential. JEA discussion addresses the lower proposal; objections question binding effect.

Assessment. The proposal actually evaluated must be clear. Multiplying all gross acreage by a net-acre maximum is not a justified approved yield. A service letter for one scenario does not prove capacity for every later scenario; later plans retain statutory requirements.

What resolves it. Actual signed certification/order or enforceable accepted limitation; same-base comparison and capacity conditions for changed plans.

Relationship. Requirements R22, R23 | Dependency NP-DENSITY | Potentially material

Correction or remaining obstacle. Additional proof or explanation may resolve

[54, pp.7, Exhibit 9.4,775-776;3, (4)(a),(e),(g)]

E01-20 Army Corps notice and conservation overlap

Targeted records gap | Primary notice within objector submission

Record. Objector attaches/identifies recorded notice for SAJ-2010-03676 at O.R.3824/174-175 involving a larger area and portions of two subject parcels. Notice says it is not itself a lien or encumbrance.

Assessment. The notice is not proof all 544.4 acres are wetlands, developed, or barred from building. It supplies a concrete lead: actual completed fill or mitigation work and separate easements could affect undeveloped status, use or preserved protections.

What resolves it. Full permit, plans, modifications, completion records and recorded easements over the actual included portions.

Relationship. Requirements R03, R07, R26 | Dependency NP-PERMIT | Potentially material

Correction or remaining obstacle. Obtain underlying instruments and spatial overlap

[54, pp.680,683–684,712–715;6;3, (4)(i)]

E01-21 Affiliated neighboring holdings are not automatic chaining

No established violation | Textual boundary

Record. Objector notes related ownership of west and north properties and invokes anti-domino concerns; does not claim common ownership alone is a statutory bar.

Assessment. The express prohibition concerns another certified enclave, not every commonly owned or controlled neighbor. Affiliation may inform the proposed-unit analysis but cannot replace evidence of prohibited certification reliance.

What resolves it. Check adjacent certification status and keep this separate from cross-jurisdiction and unit questions.

Relationship. Requirements R24 | Dependency NP-UNIT | Rejects unsupported independent failure

Correction or remaining obstacle. Additional proof or explanation may resolve

[54, p.773;3, (4)(a);4, (40)]

E01-22 Timely denial vote versus final written disposition

Procedure partly documented | Recorded chronology

Record. Receipt July 1, report July 31, hearing August 19, continued September 1 and denied September 15 according to draft minutes. Approved earlier minutes document continuances.

Assessment. The September 15 vote was within 90 elapsed days of July 1. The signed detailed denial order and rendition were not obtained; this inventory does not calculate appellate deadlines or adjudicate procedural sufficiency from draft minutes.

What resolves it. Signed denial order, final minutes, complete admitted exhibits and any petition/orders.

Relationship. Requirements R27, R28, R29 | Dependency NP-PROCESS | Potentially material

Correction or remaining obstacle. Additional proof or explanation may resolve

[54, pp.1–5;59–60;61, p.8;3, (4)(b)–(d)]

E01-23 No independent replication of staff GIS ledger

Reproducibility limit | Research and record limit

Record. Staff says GIS verified percentages; objectors repeatedly request underlying segments, numerator and historical classifications. The report presents percentages and maps rather than a complete machine-readable ledger.

Assessment. No independent survey/GIS replication has been completed in this research. A favorable staff report is evidence, while the narrow margin makes reproducible classification particularly important. Neither undocumented staff intent nor deliberate waiver is established.

What resolves it. Native GIS layers, projection, segment table, analyst calculations and response to each material disputed segment.

Relationship. Requirements R30 | Dependency NP-C1 B | Potentially material

Correction or remaining obstacle. Additional proof or explanation may resolve

[54, pp.10,679–685,776–777,834–837]

Requirement coverage for this filing

Question	Status or finding identifiers
R01 Identify the same legal land unit	E01-01
R02 Unincorporated location	Staff-supported
R03 Undeveloped subject land	E01-02, E01-20
R04 Historical date and version	E01-07, E01-09, E01-16
R05 Single ownership or control	E01-03, E01-04
R06 Continuous five-year agricultural use	E01-05, E01-06, E01-07
R07 Good-faith commercial agricultural purpose	E01-05, E01-06, E01-20
R08 Existing-development route c1a	Not required by selected route
R09 Mapped-perimeter route c1b	E01-08, E01-09
R10 Existing-development component c1b	E01-10, E01-11, E01-12
R11 Interstate combination c1c	Not required by selected route
R12 700-acre gate c2	Not required by selected route
R13 FLUM perimeter c2	Not required by selected route
R14 Urban-service perimeter c2	Not required by selected route
R15 Adopted rural study area c3	Not required by selected route
R16 Across-road or water adjacency	E01-11, E01-13
R17 Ordinary acreage ceiling	E01-01, E01-17
R18 Expanded acreage residential perimeter	E01-01, E01-14, E01-16
R19 Expanded acreage buildout density	E01-15, E01-16
R20 Expanded acreage water-plan exclusion	E01-17
R21 County population	E01-17
R22 Public-services alternative	E01-18, E01-19
R23 Adjacent density comparison	E01-19
R24 No certified-enclave chaining	E01-21
R25 Development use and intensity scope	Single-family route
R26 Preserved protections	E01-20
R27 Receipt and written report	E01-22
R28 Hearing and 90-day disposition	E01-22
R29 Order and review record	E01-22
R30 Reproducible and fair record	E01-23

5 Heritage East

ENCERT 2026 05 | 615.41 reported acres | Reviewed route c 2

Independent assessment. Do not affirm the broad request as presented

Urban-service proof requires a defensible historical plan/facilities link. Commercial/industrial scope is not supported by staff's c 2 route. Single-family certification could be supportable with that scope and the other requirements established; agricultural and boundary evidence warrant explicit findings.

Procedural status: Denied. Staff: Favorable. These labels are not substitutes for the individual findings below.

E05-01 East boundary exclusions and land-unit consistency

Evidence reconciliation | Evidence assessment

Record. Heritage East is presented as 615.41 acres. Legal descriptions use portions of deed land and express less-and-except clauses; the same ownership affidavit identifies three tax parcel numbers across Heritage holdings.

Assessment. The statutory parcel definition prevents assuming that a tax ID alone fixes the enclave boundary. Conversely, all related land need not automatically be aggregated. Identify whether excluded acreage reflects preexisting separate units, easements or an owner-designated subset, and apply every test to the same unit.

What resolves it. Historical overlay of legal description, deed, assessment/forestry footprint and excluded portions. Include reason and date for each exclusion.

Relationship. Requirements R01, R04 | Dependency H05-UNIT | Potentially material

Correction or remaining obstacle. Depends on historical configuration and legal interpretation

[55, pp.33-37, deed exhibits;4, (4),(40)]

E05-02 East unincorporated and undeveloped setting

Staff-supported with limited independent verification | Evidence assessment

Record. Staff treats the subject as unincorporated agricultural land; legal description, assessor materials and historical aerials support a timberland setting.

Assessment. No specific included residential structure has been established in this review for this unit. That is not a complete building/permit audit. Forestry operations and easements cannot simply be labeled disqualifying development without applying §380.04 exceptions.

What resolves it. Confirm jurisdiction and historical improvements against the exact boundary; identify any nonagricultural development.

Relationship. Requirements R02, R03 | Dependency H05-UNIT | Supports eligibility with verification limit

Correction or remaining obstacle. Additional proof or explanation may resolve

[55, pp.7-12,36-37,49-59;4;6]

E05-03 East single-owner evidence

Staff-supported | Evidence assessment

Record. Staff verified ownership and relied on deed, corporate records and Chris Shee's ownership/control statement. A 2020 purchase predates January 1 2025.

Assessment. Evidence supports single-entity ownership. Common control across the two applications is not a statutory requirement to combine both. Execution quality of the particular affidavit copy is addressed separately for West.

What resolves it. Retain deed-to-unit mapping and relevant corporate authority; verify every included portion.

Relationship. Requirements R05 | Dependency H05-TITLE | Supports ownership

Correction or remaining obstacle. Additional proof or explanation may resolve

[55, pp.7–8,31–35,39–48;4, (4)(a)]

E05-04 East agriculture accepted largely through classification

Staff-supported; independent confirmation limited | Evidence assessment

Record. Staff verified agricultural classification/assessment from 2015 through 2025. Applicant affidavit describes approximately seventy years of timber use and continuation after the 2020 acquisition. Several detailed factor responses are blank in the staff table.

Assessment. This is meaningful supporting evidence. Unanswered factors are not separate statutory failures. A more defensible continuous-use finding would connect the actual assessed acres and commercial timber operations to the entire proposed unit and five-year period, rather than treat a tax label as automatically conclusive.

What resolves it. Classification applications/history, timber/management evidence and acreage crosswalk; define lookback and prior applications.

Relationship. Requirements R06, R07 | Dependency H05-AG | Potentially material

Correction or remaining obstacle. Historical supporting documents can cure a proof gap; future activity cannot create past use

[55, pp.8–9,18–19,33–35,49–59;5, (3)(b)]

E05-05 East applicant legal paraphrase omits commercial

Document accuracy issue | Verified text comparison

Record. The narrative's paraphrase of bona fide agricultural purposes omits the word commercial, while §193.461(3)(b) includes it. Applicant also argues classification is per se affirmation.

Assessment. Use the statutory definition in every analysis. Omission in advocacy does not show staff applied a wrong test or that timber activity lacked a commercial purpose. The actual use evidence controls; Sheik is not a direct SB 686 holding.

What resolves it. Correct legal paraphrase and evaluate commercial purpose with the original statutory language.

Relationship. Requirements R07 | Dependency H05-AG | Correctable legal presentation

Correction or remaining obstacle. Correct explanation; underlying commercial-use fact remains required

[55, pp.18–19;5, (3)(b);67, pp.14,16]

E05-06 East Development Area Boundary interpretation

Disputed interpretation | Balanced legal and evidence assessment

Record. Staff reads Objective A.1.2 with the CIE and treats the DAB as satisfying the functional urban service area definition. Applicant cites 2025 utility policies and asserts infrastructure/capacity.

Assessment. The applicant has a plausible functional argument; the statute does not require the literal label urban service area in every qualifying plan area. The competing question is whether the actual counted parcels have the requisite plan identification and in-place facilities/capacity/roads or CIE support. A general DAB label is not a self-executing answer.

What resolves it. Relevant adopted plan version; precise facilities/capacity or CIE citations and map overlay for every counted urban-service segment.

Relationship. Requirements R04, R11, R14 | Dependency H05-USA | Potentially material

Correction or remaining obstacle. Additional proof or explanation may resolve

[55, pp.9–11,20;4, (57);14, A.1.2;65, pp.1–2,28]

E05-07 East binding service offer exists in affidavit text*Staff-supported statutory alternative | Evidence assessment*

Record. Staff says adequate services are not presently available. Narrative says negotiate in good faith; affidavit paragraph 5 continues onto p.34 and expressly offers a binding agreement for facilities and services.

Assessment. Reading only the short narrative would miss supporting evidence. Paragraph d allows an offer; an unsigned final infrastructure agreement is not itself failure. For West, execution issue affects the affidavit's form, but other statements and testimony may also supply an offer.

What resolves it. Identify the operative offer, authority, service categories and proportionate-share scope; separate later execution/capacity obligations.

Relationship. Requirements R22 | Dependency H05-SERVICES | Supports chosen service alternative

Correction or remaining obstacle. Additional proof or explanation may resolve

[55, p.11, pp.33-35;4, (4)(d)]

E05-08 East thirteen per acre needs net/gross clarification*Scope ambiguity | Evidence assessment*

Record. Application seeks residential density of 13 units per acre; staff compares adjacent Mixed Use density of 13 per net acre.

Assessment. Those statements are not necessarily inconsistent if applicant means the same net-acre basis. They also cannot support multiplying all gross enclave acreage by thirteen as a guaranteed dwelling entitlement. Match definitions, actual allowed adjacent uses and any controlling restrictions.

What resolves it. Express proposal and density denominator, adjacent operative policy/PUD text, and any accepted unit or use limitation.

Relationship. Requirements R23 | Dependency H05-DENSITY | Potentially material

Correction or remaining obstacle. Clarify or narrow proposal; incompatible actual proposal would need revision

[55, p.6, p.13;3, (4)(a),(e),(h)]

E05-09 East acreage and county population below ordinary limits*Supported on reported inputs | Evidence assessment*

Record. 615.41 acres is below both 700 and 1,280. EDR reports SJC population 348,336.

Assessment. No enlarged-acreage showing is necessary for this submitted unit. These favorable facts remain subject to the unit/exclusion issue; density maxima are separate from acreage caps.

What resolves it. Retain reconciled acreage and official population source.

Relationship. Requirements R17, R21 | Dependency H05-UNIT | Supports ordinary size and population gates

Correction or remaining obstacle. Additional proof or explanation may resolve

[55, pp.5,11-12;10;4, (4)(e)-(f)]

E05-10 East adjacent enclave and preserved instruments*No established chaining violation | Evidence assessment*

Record. Heritage East and West are separate requests under common ownership; deeds and descriptions include easement references.

Assessment. No identified calculation in this review proves prohibited reliance on the other application as a certified enclave. Recorded conservation protections, if overlapping, remain despite certification. Ordinary utility/access easements should not be mislabeled conservation easements.

What resolves it. Map actual easement instruments and certification chronology; identify any frontage claimed through the other enclave.

Relationship. Requirements R24, R26 | Dependency H05-UNIT | Restriction review, not demonstrated independent failure

Correction or remaining obstacle. Additional proof or explanation may resolve

[55, pp.36-48;3, (4)(a),(i)]

E05-11 East initial approval and reconsideration are separate events

Procedure partly documented | Recorded chronology and source limits

Record. July 7 filing; July 31 report; August 19 approval in approved minutes; September 28 reversal supported by portal and contemporaneous procedural reporting. Reconsideration packets were retrieved.

Assessment. Agenda materials prove what was scheduled, not the later vote. Signed final orders, rendition and the complete litigation docket were not obtained. The legality of reopening an approval is distinct from initial eligibility; neither should be assumed from a news headline.

What resolves it. Signed August and September orders, certified September 28 minutes/transcript, filings and actual court orders.

Relationship. Requirements R27, R28, R29 | Dependency H05-PROCESS | Potentially material

Correction or remaining obstacle. Additional proof or explanation may resolve

[55, p.4;59, pp.2-4;62-64;24-25;76]

E05-12 East meets the c 2 size and FLUM arithmetic on submitted figures

Staff-supported | Staff finding and reproduced calculation

Record. 615.41 acres; applicant gives total 25,344.7 feet and FLUM qualifying 17,502.93 feet, about 69.06%. Staff excludes Public-designated frontage from the qualifying uses.

Assessment. The size and mapped-use arithmetic clear c 2 thresholds on these figures. These are independent from the urban-service classification dispute. Staff's Public-use exclusion demonstrates a documented application of the specified categories.

What resolves it. Confirm historical FLUM and nonoverlapping segments against authoritative boundary.

Relationship. Requirements R12, R13 | Dependency HE-FLUM | Supports two selected-route components

Correction or remaining obstacle. Additional proof or explanation may resolve

[55, pp.9-10,20,38;4, (4)(c)2]

E05-13 East urban-service percentage has two versions

Document inconsistency | Record comparison

Record. Applicant states 19,768.86/25,344.7 feet, 78%; staff states approximately 78.37%.

Assessment. Both clear 50 if the same counted land legally qualifies as urban-service area. Arithmetic reconciliation cannot resolve the legal classification. Do not count this numerical difference and the DAB dispute as two proven independent failures.

What resolves it. Staff numerator/denominator and segment ledger; reconcile rounding, geometry and date.

Relationship. Requirements R14 | Dependency H05-USA | Potentially material

Correction or remaining obstacle. Additional proof or explanation may resolve

[55, pp.10,20;4, (4)(c)2,(57)]

E05-14 East requested uses exceed staff's supported route*Proposal scope restriction | Direct statutory and staff distinction*

Record. Application mentions residential, commercial, industrial and other uses allowed within Mixed Use. Staff expressly says East meets c 2, not c 1 c, and paragraph h commercial/industrial treatment does not apply.

Assessment. On staff's own route analysis the requested commercial/industrial expansion is not supported by paragraph h. This is a limit on the proposed development scope, not automatic defeat of a qualifying single-family certification. A differently supported c 1 c case would require new proof.

What resolves it. Narrow/clarify the certification and subsequent plans; do not present East as entitled to West's paragraph h benefit.

Relationship. Requirements R25 | Dependency HE-SCOPE | Potentially material

Correction or remaining obstacle. Scope can be narrowed; broader statutory route must be separately established [55, pp.6,13;3, (4)(e),(h)]

E05-15 East affidavit execution visually corroborated*Supported document form | Visual document observation*

Record. The August packet p.35 shows Chris Shee's signature and a completed notarial block/seal, unlike the West copy reviewed.

Assessment. This supports treatment as a sworn submission, without independently verifying the truth of every assertion. The same general affidavit identifies the three Heritage parcel IDs; it should be reconciled with each application unit.

What resolves it. Retain executed original and boundary crosswalk.

Relationship. Requirements R05, R22 | Dependency H05-TITLE | Supports evidence form

Correction or remaining obstacle. Additional proof or explanation may resolve

[55, pp.33-35; visual check of p.35]

Requirement coverage for this filing

Question	Status or finding identifiers
R01 Identify the same legal land unit	E05-01
R02 Unincorporated location	E05-02
R03 Undeveloped subject land	E05-02
R04 Historical date and version	E05-01, E05-06
R05 Single ownership or control	E05-03, E05-15
R06 Continuous five-year agricultural use	E05-04
R07 Good-faith commercial agricultural purpose	E05-04, E05-05
R08 Existing-development route c1a	Not required by selected route
R09 Mapped-perimeter route c1b	Not required by selected route
R10 Existing-development component c1b	Not required by selected route
R11 Interstate combination c1c	E05-06
R12 700-acre gate c2	E05-12
R13 FLUM perimeter c2	E05-12
R14 Urban-service perimeter c2	E05-06, E05-13
R15 Adopted rural study area c3	Not required by selected route
R16 Across-road or water adjacency	Independent verification limited
R17 Ordinary acreage ceiling	E05-09
R18 Expanded acreage residential perimeter	Not required by selected route
R19 Expanded acreage buildout density	Not required by selected route
R20 Expanded acreage water-plan exclusion	Not required by selected route
R21 County population	E05-09
R22 Public-services alternative	E05-07, E05-15
R23 Adjacent density comparison	E05-08
R24 No certified-enclave chaining	E05-10
R25 Development use and intensity scope	E05-14
R26 Preserved protections	E05-10
R27 Receipt and written report	E05-11
R28 Hearing and 90-day disposition	E05-11
R29 Order and review record	E05-11
R30 Reproducible and fair record	Research/record limitation

6 Heritage West

ENCERT 2026 06 | 550.78 reported acres | Reviewed route c 1 c

Independent assessment. Do not affirm until material proof is reconciled

The c 1 c urban-service basis is material. Reconcile perimeter arithmetic, proposed scope/density and incomplete notarial copy. The verified numerical discrepancy alone does not cause a 75% failure, and documentary defects may be curable.

Procedural status: Denied. Staff: Favorable. These labels are not substitutes for the individual findings below.

E06-01 West boundary exclusions and land-unit consistency

Evidence reconciliation | Evidence assessment

Record. Heritage West is presented as 550.78 acres. Legal descriptions use portions of deed land and express less-and-except clauses; the same ownership affidavit identifies three tax parcel numbers across Heritage holdings.

Assessment. The statutory parcel definition prevents assuming that a tax ID alone fixes the enclave boundary. Conversely, all related land need not automatically be aggregated. Identify whether excluded acreage reflects preexisting separate units, easements or an owner-designated subset, and apply every test to the same unit.

What resolves it. Historical overlay of legal description, deed, assessment/forestry footprint and excluded portions. Include reason and date for each exclusion.

Relationship. Requirements R01, R04 | Dependency H06-UNIT | Potentially material

Correction or remaining obstacle. Depends on historical configuration and legal interpretation

[56, pp.33–37, deed exhibits;4, (4),(40)]

E06-02 West unincorporated and undeveloped setting

Staff-supported with limited independent verification | Evidence assessment

Record. Staff treats the subject as unincorporated agricultural land; legal description, assessor materials and historical aerials support a timberland setting.

Assessment. No specific included residential structure has been established in this review for this unit. That is not a complete building/permit audit. Forestry operations and easements cannot simply be labeled disqualifying development without applying §380.04 exceptions.

What resolves it. Confirm jurisdiction and historical improvements against the exact boundary; identify any nonagricultural development.

Relationship. Requirements R02, R03 | Dependency H06-UNIT | Supports eligibility with verification limit

Correction or remaining obstacle. Additional proof or explanation may resolve

[56, pp.7–12,36–37,49–59;4;6]

E06-03 West single-owner evidence

Staff-supported | Evidence assessment

Record. Staff verified ownership and relied on deed, corporate records and Chris Shee's ownership/control statement. A 2020 purchase predates January 1 2025.

Assessment. Evidence supports single-entity ownership. Common control across the two applications is not a statutory requirement to combine both. Execution quality of the particular affidavit copy is addressed separately for West.

What resolves it. Retain deed-to-unit mapping and relevant corporate authority; verify every included portion.

Relationship. Requirements R05 | Dependency H06-TITLE | Supports ownership

Correction or remaining obstacle. Additional proof or explanation may resolve

[56, pp.7–8,31–35,39–48;4, (4)(a)]

E06-04 West agriculture accepted largely through classification

Staff-supported; independent confirmation limited | Evidence assessment

Record. Staff verified agricultural classification/assessment from 2015 through 2025. Applicant affidavit describes approximately seventy years of timber use and continuation after the 2020 acquisition. Several detailed factor responses are blank in the staff table.

Assessment. This is meaningful supporting evidence. Unanswered factors are not separate statutory failures. A more defensible continuous-use finding would connect the actual assessed acres and commercial timber operations to the entire proposed unit and five-year period, rather than treat a tax label as automatically conclusive.

What resolves it. Classification applications/history, timber/management evidence and acreage crosswalk; define lookback and prior applications.

Relationship. Requirements R06, R07 | Dependency H06-AG | Potentially material

Correction or remaining obstacle. Historical supporting documents can cure a proof gap; future activity cannot create past use

[56, pp.8–9,18–19,33–35,49–59;5, (3)(b)]

E06-05 West applicant legal paraphrase omits commercial

Document accuracy issue | Verified text comparison

Record. The narrative's paraphrase of bona fide agricultural purposes omits the word commercial, while §193.461(3)(b) includes it. Applicant also argues classification is per se affirmation.

Assessment. Use the statutory definition in every analysis. Omission in advocacy does not show staff applied a wrong test or that timber activity lacked a commercial purpose. The actual use evidence controls; Sheik is not a direct SB 686 holding.

What resolves it. Correct legal paraphrase and evaluate commercial purpose with the original statutory language.

Relationship. Requirements R07 | Dependency H06-AG | Correctable legal presentation

Correction or remaining obstacle. Correct explanation; underlying commercial-use fact remains required

[56, pp.18–19;5, (3)(b);67, pp.14,16]

E06-06 West Development Area Boundary interpretation

Disputed interpretation | Balanced legal and evidence assessment

Record. Staff reads Objective A.1.2 with the CIE and treats the DAB as satisfying the functional urban service area definition. Applicant cites 2025 utility policies and asserts infrastructure/capacity.

Assessment. The applicant has a plausible functional argument; the statute does not require the literal label urban service area in every qualifying plan area. The competing question is whether the actual counted parcels have the requisite plan identification and in-place facilities/capacity/roads or CIE support. A general DAB label is not a self-executing answer.

What resolves it. Relevant adopted plan version; precise facilities/capacity or CIE citations and map overlay for every counted urban-service segment.

Relationship. Requirements R04, R11, R14 | Dependency H06-USA | Potentially material

Correction or remaining obstacle. Additional proof or explanation may resolve

[56, pp.9–11,20;4, (57);14, A.1.2;65, pp.1–2,28]

E06-07 West binding service offer exists in affidavit text*Staff-supported statutory alternative | Evidence assessment*

Record. Staff says adequate services are not presently available. Narrative says negotiate in good faith; affidavit paragraph 5 continues onto p.34 and expressly offers a binding agreement for facilities and services.

Assessment. Reading only the short narrative would miss supporting evidence. Paragraph d allows an offer; an unsigned final infrastructure agreement is not itself failure. For West, execution issue affects the affidavit's form, but other statements and testimony may also supply an offer.

What resolves it. Identify the operative offer, authority, service categories and proportionate-share scope; separate later execution/capacity obligations.

Relationship. Requirements R22 | Dependency H06-SERVICES | Supports chosen service alternative

Correction or remaining obstacle. Additional proof or explanation may resolve

[56, p.11, pp.33-35;4, (4)(d)]

E06-08 West thirteen per acre needs net/gross clarification*Scope ambiguity | Evidence assessment*

Record. Application seeks residential density of 13 units per acre; staff compares adjacent Mixed Use density of 13 per net acre.

Assessment. Those statements are not necessarily inconsistent if applicant means the same net-acre basis. They also cannot support multiplying all gross enclave acreage by thirteen as a guaranteed dwelling entitlement. Match definitions, actual allowed adjacent uses and any controlling restrictions.

What resolves it. Express proposal and density denominator, adjacent operative policy/PUD text, and any accepted unit or use limitation.

Relationship. Requirements R23 | Dependency H06-DENSITY | Potentially material

Correction or remaining obstacle. Clarify or narrow proposal; incompatible actual proposal would need revision

[56, p.6, p.13;3, (4)(a),(e),(h)]

E06-09 West acreage and county population below ordinary limits*Supported on reported inputs | Evidence assessment*

Record. 550.78 acres is below both 700 and 1,280. EDR reports SJC population 348,336.

Assessment. No enlarged-acreage showing is necessary for this submitted unit. These favorable facts remain subject to the unit/exclusion issue; density maxima are separate from acreage caps.

What resolves it. Retain reconciled acreage and official population source.

Relationship. Requirements R17, R21 | Dependency H06-UNIT | Supports ordinary size and population gates

Correction or remaining obstacle. Additional proof or explanation may resolve

[56, pp.5,11-12;10;4, (4)(e)-(f)]

E06-10 West adjacent enclave and preserved instruments*No established chaining violation | Evidence assessment*

Record. Heritage East and West are separate requests under common ownership; deeds and descriptions include easement references.

Assessment. No identified calculation in this review proves prohibited reliance on the other application as a certified enclave. Recorded conservation protections, if overlapping, remain despite certification. Ordinary utility/access easements should not be mislabeled conservation easements.

What resolves it. Map actual easement instruments and certification chronology; identify any frontage claimed through the other enclave.

Relationship. Requirements R24, R26 | Dependency H06-UNIT | Restriction review, not demonstrated independent failure

Correction or remaining obstacle. Additional proof or explanation may resolve

[56, pp.36-48;3, (4)(a),(i)]

E06-11 West initial approval and reconsideration are separate events

Procedure partly documented | Recorded chronology and source limits

Record. July 7 filing; July 31 report; August 19 approval in approved minutes; September 28 reversal supported by portal and contemporaneous procedural reporting. Reconsideration packets were retrieved.

Assessment. Agenda materials prove what was scheduled, not the later vote. Signed final orders, rendition and the complete litigation docket were not obtained. The legality of reopening an approval is distinct from initial eligibility; neither should be assumed from a news headline.

What resolves it. Signed August and September orders, certified September 28 minutes/transcript, filings and actual court orders.

Relationship. Requirements R27, R28, R29 | Dependency H06-PROCESS | Potentially material

Correction or remaining obstacle. Additional proof or explanation may resolve

[56, p.4;59, pp.2-4;62-64;24-25;77]

E06-12 West perimeter arithmetic has three competing presentations

Verified document inconsistency | Verified arithmetic

Record. Narrative p.20 gives total 32,355.62 feet, qualifying 25,893.07 and 80.59%. Map segments sum to 32,132.32, giving about 80.58%; staff reports 80.61%.

Assessment. Using narrative denominator gives 80.0265%, not 80.59%. Narrative total exceeds map sum by 223.30 feet. Both reproduced ratios remain above 75. This is a documented arithmetic/reconciliation issue, not a proven failed threshold. Urban-service eligibility remains unresolved independently.

What resolves it. One authoritative total and segment ledger explaining the 223.30-foot discrepancy and staff percentage.

Relationship. Requirements R11 | Dependency HW-PERIM | Potentially material

Correction or remaining obstacle. Correct calculation if underlying geometry and qualifying uses support it

[56, pp.10,20,38; arithmetic reproduced in workbook]

E06-13 West interstate contribution and alternative routes

Disputed method; no automatic disqualification | Route-specific interpretation

Record. Map labels 11,167.66 feet interstate, 4,433.75 Mixed Use, 10,291.66 Residential B and 6,239.25 R/S. Staff uses c 1 c.

Assessment. The statute expressly permits interstate in c 1 c; it is incorrect to demand 50% existing development under that branch. If c 1 c fails urban-service proof, c 2 cannot be assumed to fail solely from the noninterstate sum: mandatory across-I95 treatment could alter a separate c 2 ledger. No alternative is established merely by being conceivable.

What resolves it. Separate c 1 c and any asserted c 2 calculations; opposite parcels and road geometry, with all other elements.

Relationship. Requirements R11, R16 | Dependency HW-PERIM | Potentially material

Correction or remaining obstacle. Additional proof or explanation may resolve

[56, pp.9–10,20,38;4, (4)(c)1.c,(c)2 and final sentence]

E06-14 West affidavit copy lacks completed notarial block

Verified documentary irregularity | Visual document observation

Record. Visual inspection of August p.35 and September reconsideration p.35 shows the affiant’s signature and date, but blank notary signature/name/commission fields and no visible seal. East’s p.35 is executed.

Assessment. Do not describe this particular West copy as fully notarized. This is not proof the historical assertions are false or that no executed original exists. Deeds, the executed East affidavit covering the same IDs, and hearing testimony may supply relevant proof; the record should identify what was actually adopted.

What resolves it. Executed original or authenticated replacement and explanation of record incorporation; verify no omitted page/attachment.

Relationship. Requirements R05, R06, R22 | Dependency HW-AFFIDAVIT | Evidence-form issue across several assertions

Correction or remaining obstacle. Potential documentary cure, not creation of missing historical facts

[56, pp.33–35;63, p.35;55, p.35; selected-page visual checks]

E06-15 West paragraph h is conditional and use-specific

Scope requires clarification | Conditional statutory application

Record. Unlike East, staff identifies c 1 c for West. Application seeks 13 units per acre and broad commercial/industrial/other Mixed Use permissions.

Assessment. If c 1 c is established and interstate adjacency exists, paragraph h supports specified nonresidential uses with an adjacent density/intensity comparator. It does not create an unbounded entitlement to every use in a mixed-use category. The DAB dispute directly affects this expanded-use route.

What resolves it. Actual requested intensity/FAR and use, adjacent authorization, and explicit route finding.

Relationship. Requirements R25 | Dependency H06-USA | Potentially material

Correction or remaining obstacle. Additional proof or explanation may resolve

[56, pp.6,13;3, (4)(h)]

Requirement coverage for this filing

Question	Status or finding identifiers
R01 Identify the same legal land unit	E06-01
R02 Unincorporated location	E06-02
R03 Undeveloped subject land	E06-02
R04 Historical date and version	E06-01, E06-06
R05 Single ownership or control	E06-03, E06-14
R06 Continuous five-year agricultural use	E06-04, E06-14
R07 Good-faith commercial agricultural purpose	E06-04, E06-05
R08 Existing-development route c1a	Not required by selected route
R09 Mapped-perimeter route c1b	Not required by selected route
R10 Existing-development component c1b	Not required by selected route
R11 Interstate combination c1c	E06-06, E06-12, E06-13
R12 700-acre gate c2	Not required by selected route
R13 FLUM perimeter c2	Not required by selected route
R14 Urban-service perimeter c2	E06-06
R15 Adopted rural study area c3	Not required by selected route
R16 Across-road or water adjacency	E06-13
R17 Ordinary acreage ceiling	E06-09
R18 Expanded acreage residential perimeter	Not required by selected route
R19 Expanded acreage buildout density	Not required by selected route
R20 Expanded acreage water-plan exclusion	Not required by selected route
R21 County population	E06-09
R22 Public-services alternative	E06-07, E06-14
R23 Adjacent density comparison	E06-08
R24 No certified-enclave chaining	E06-10
R25 Development use and intensity scope	E06-15
R26 Preserved protections	E06-10
R27 Receipt and written report	E06-11
R28 Hearing and 90-day disposition	E06-11
R29 Order and review record	E06-11
R30 Reproducible and fair record	Research/record limitation

7 Sandy Creek

ENCERT 2026 07 | 379.08 reported acres | Reviewed route c 2

Independent assessment. Certification not established on reviewed record

Two independent preliminary staff deficiencies—historical common control and continuous commercial agriculture—require resolution. Later supporting material deserves a full response; DAB basis is also disputed. Withdrawal prevents treating the staff letter as a final denial.

Procedural status: Withdrawn. Staff: Unfavorable preliminary. These labels are not substitutes for the individual findings below.

E07-01 Two corporations and insufficient common-control proof

Express staff deficiency | Official preliminary finding

Record. 375.33 acres is held by Sandy Creek Preservation Corporation and 3.75 by Sandy Creek Investment Corporation. Staff found common president/officer information insufficient to establish one person/entity's legal or factual control on January 1 2025.

Assessment. This is an actual preliminary staff insufficiency finding, independent from the agricultural-use concern. Two owners are not automatically disqualifying because common control is allowed. Staff did not prove no common controller existed.

What resolves it. Historical ownership/governance/control instruments, powers and competent testimony for both corporations.

Relationship. Requirements R05 | Dependency SC-CONTROL | Potentially material

Correction or remaining obstacle. Documentary cure if qualifying common control actually existed

[57, pp.5,7-8;4, (4)(a)]

E07-02 Five-year commercial use not established to staff's satisfaction

Express staff deficiency | Official preliminary finding

Record. Staff found hay agreement supported roughly 105 acres but did not demonstrate continuous bona fide commercial use of the entire proposed property. No agricultural classification was reflected in reviewed records.

Assessment. This is a second distinct preliminary deficiency. Staff correctly says no classification is not dispositive. The proper question is commercial use of the subject unit during the prescribed period, with reasonable treatment of wetlands and forestry support areas; it is not an annual-profit or every-square-foot-harvest test.

What resolves it. Operational evidence, parcel/stand crosswalk, defined five-year period and explanation of conservation management versus commercial forestry.

Relationship. Requirements R06, R07 | Dependency SC-AG | Potentially material

Correction or remaining obstacle. Historical facts may be proven later; future planting cannot retroactively supply missing use

[57, pp.7-9,125-144;5, (3)(b)]

E07-03 Late forestry supplement supports a real contrary case

Material supplemental evidence | Applicant evidence versus preliminary finding

Record. Staff says it could not review the full August 28 supplement before issuing its letter. Packet includes timber chronology, historic imagery, long-rotation explanation, hay discussion and forestry plan.

Assessment. A final merits judgment cannot simply repeat the earlier deficiency without considering later evidence. Tree growth over a commercial rotation can support continuity; the supplement's chronology and assertions still need authentication and geographic matching.

What resolves it. Full dated submission log; staff response to the supplement, competent forester/operator evidence and supporting underlying records.

Relationship. Requirements R06, R07 | Dependency SC-AG | Potentially material

Correction or remaining obstacle. Additional proof or explanation may resolve

[57, p.7,pp.125–144]

E07-04 Hay acreage and forestry acreage need reconciliation

Document inconsistency or scope difference | Verified document comparison

Record. 2020 hay discussion identifies approximately 105.3 acres; forest plan table lists 157.20 open/hayfield acres, 118.66 pine, 85.57 swamp, 14.14 pond and 4.43 road/trail, totaling 380.00. Application totals 379.08; stand-map boundary says 378.69.

Assessment. Different dates, land cover versus leased production, and approximate mapping could explain these differences. They do not prove false evidence. The 51.90-acre difference in hay figures matters to the extent of demonstrated operation and needs a time-and-boundary explanation.

What resolves it. Dated stand/lease maps, acreage reconciliation and actual activity on each included part.

Relationship. Requirements R06, R07 | Dependency SC-AG | Potentially material

Correction or remaining obstacle. Additional proof or explanation may resolve

[57, pp.5,129,131,144]

E07-05 Forestry plan contains an impossible cover date

Correctable documentary issue | Document observation

Record. Plan cover p.130 reads June 31 2018; interior pages say June 2018 and describe inspections from March through June.

Assessment. June has thirty days. This appears consistent with a clerical dating error; it is not evidence of fabrication. Authenticity, author and contemporaneous creation matter because the plan is offered as historical proof.

What resolves it. Author-authenticated correct date and original document/version history.

Relationship. Requirements R04, R06 | Dependency SC-PLAN | Evidence reliability, not independent substantive failure

Correction or remaining obstacle. Potential clerical correction and authentication

[57, pp.130–131; selected source text]

E07-06 Conservation and mitigation are not automatically commercial agriculture

Material factual distinction | Evidence assessment

Record. Staff identifies a conservation easement since 2019 that restricts inconsistent activity. Later evidence describes timber and hay use; plan identifies substantial swamp/pond acreage.

Assessment. Conservation management may coexist with lawful commercial agriculture, but vegetation maintenance for mitigation alone does not establish the statutory commercial purpose. The exact easement controls permitted activity; acreage is not automatically removed from the enclave or from protections.

What resolves it. Full recorded easement and management obligations overlaid with commercial operations and historical use.

Relationship. Requirements R07, R26 | Dependency SC-AG | Potentially material

Correction or remaining obstacle. Evidence may resolve; inconsistent historic land use cannot be fixed by relabeling

[57, p.9,recorded instruments,pp.130–144;3, (4)(i);5]

E07-07 Sandy's c 2 finding contains the same DAB issue*Staff-supported but disputed legal premise | Independent analysis of staff-supported element*

Record. 379.08 acres is below 700. Staff reports 58.5% qualifying surrounding FLUM and DAB frontage and finds remaining requirements satisfied.

Assessment. Mapped FLUM and urban-service qualification are separate tests. The shared DAB interpretation can remain contested even when staff lists only two preliminary deficiencies. This is an additional analytic vulnerability, not a third staff finding of failure.

What resolves it. Separate FLUM/urban-service ledgers and actual plan/facilities/CIE support for the counted neighbors.

Relationship. Requirements R12, R13, R14 | Dependency SC-USA | Potentially material

Correction or remaining obstacle. Additional proof or explanation may resolve

[57, pp.7,9-12;4, (4)(c)2,(57);65]

E07-08 Across I95 should use opposite parcels in c 2*Supported textual method | Route application*

Record. Applicant identifies its west boundary at I95 and uses parcels across the right-of-way; north adjoins Sandy Creek PUD.

Assessment. The statutory across-ROW rule supports this method. Counting I95 itself as qualifying mapped residential land would be different and needs correction if done. A c 1 c argument requires its own 75% calculation; mere interstate adjacency does not establish it.

What resolves it. Segment map identifying opposite parcels, historic use/designation and qualifying length.

Relationship. Requirements R16 | Dependency SC-USA | Supports crossing while requiring classification proof

Correction or remaining obstacle. Additional proof or explanation may resolve

[57, pp.9-12;4, final sentence (4)]

E07-09 Sandy's service offer was accepted by staff*Staff-supported | Evidence assessment*

Record. Staff accepted willingness/offer to fund, construct or dedicate for required public improvements, despite other deficiencies.

Assessment. Lack of built facilities is not an additional automatic failure where paragraph d's offer alternative is adequately invoked. This does not settle whether adjacent DAB parcels qualify for the c 2 urban-service test.

What resolves it. Identify operative signed offer and service categories; future obligations at actual development scale.

Relationship. Requirements R22 | Dependency SC-SERVICES | Supports services route

Correction or remaining obstacle. Additional proof or explanation may resolve

[57, pp.7,12-13;4, (4)(d)]

E07-10 150 homes versus staff's net-acre maximum*Scope clarification | Evidence assessment*

Record. Proposal is up to 150 single-family homes on 379.08 acres, approximately 0.40 per gross acre. Staff notes adjacent Mixed Use 13 per net acre.

Assessment. The proposal is specific enough to evaluate, unlike bare unknown-density notes on some other filings. The staff maximum should not be reported as approval of 13 times all gross acres. c 2 does not by itself authorize commercial/industrial development under paragraph h.

What resolves it. Confirm exact proposed/accepted cap and permissible adjacent density on a consistent base.

Relationship. Requirements R23, R25 | Dependency SC-DENSITY | Supports proposal definition with comparator clarification

Correction or remaining obstacle. Additional proof or explanation may resolve

[57, pp.5-6;3, (4)(a),(e),(h)]

E07-11 Other threshold conditions have favorable staff support

Staff-supported | Evidence assessment

Record. Staff treats the unit as unincorporated/undeveloped, below ordinary acreage limits and in an eligible-population county; forestry plan calls the tract undeveloped.

Assessment. The visible record identifies no independent demonstrated violation of these gates. Conservation status and agriculture remain separate inquiries; neither should be converted into automatic developed status without actual facts.

What resolves it. Historical unit/jurisdiction overlay and any nonagricultural improvement evidence.

Relationship. Requirements R02, R03, R17, R21 | Dependency SC-UNIT | Favorable record support, not complete independent audit

Correction or remaining obstacle. Additional proof or explanation may resolve

[57, pp.5,7-13,130;4;6;10]

E07-12 Withdrawal is not a denial on two or more grounds

Recorded withdrawal | Recorded procedure

Record. Application August 5; staff report September 4; September 15 draft minutes record withdrawal.

Assessment. Staff identified two preliminary deficiencies but the board did not render a merits denial in the reviewed account. Later support was not fully evaluated in that staff letter. The accurate status is withdrawn with unresolved merits, not denied or permanently ineligible.

What resolves it. Withdrawal instrument, final minutes and any later refile/supplemented application.

Relationship. Requirements R27, R28, R29 | Dependency SC-PROCESS | Limits disposition claim

Correction or remaining obstacle. Additional proof or explanation may resolve

[57, pp.4,7;61, p.8;78]

Requirement coverage for this filing

Question	Status or finding identifiers
R01 Identify the same legal land unit	Independent verification limited
R02 Unincorporated location	E07-11
R03 Undeveloped subject land	E07-11
R04 Historical date and version	E07-05
R05 Single ownership or control	E07-01
R06 Continuous five-year agricultural use	E07-02, E07-03, E07-04, E07-05
R07 Good-faith commercial agricultural purpose	E07-02, E07-03, E07-04, E07-06
R08 Existing-development route c1a	Not required by selected route
R09 Mapped-perimeter route c1b	Not required by selected route
R10 Existing-development component c1b	Not required by selected route
R11 Interstate combination c1c	Not required by selected route
R12 700-acre gate c2	E07-07
R13 FLUM perimeter c2	E07-07
R14 Urban-service perimeter c2	E07-07
R15 Adopted rural study area c3	Not required by selected route
R16 Across-road or water adjacency	E07-08
R17 Ordinary acreage ceiling	E07-11
R18 Expanded acreage residential perimeter	Not required by selected route
R19 Expanded acreage buildout density	Not required by selected route
R20 Expanded acreage water-plan exclusion	Not required by selected route
R21 County population	E07-11
R22 Public-services alternative	E07-09
R23 Adjacent density comparison	E07-10
R24 No certified-enclave chaining	No violation established
R25 Development use and intensity scope	E07-10
R26 Preserved protections	E07-06
R27 Receipt and written report	E07-12
R28 Hearing and 90-day disposition	E07-12
R29 Order and review record	E07-12
R30 Reproducible and fair record	Research/record limitation

8 AFI

ENCERT 2026 08 | 310 reported acres | Reviewed route c 1 a narrative

Independent assessment. Strongest support for certification, with stated reservations

Favorable staff findings, conservative frontage adjustments, ownership/agricultural evidence and recorded approval support AFI. Correct the route citation and independently reconcile credited common-element frontage, historic facts and approval terms before describing compliance as conclusively established.

Procedural status: Approved. Staff: Favorable. These labels are not substitutes for the individual findings below.

E08-01 AFI acreage and road-bisected unit

Staff-supported with boundary reconciliation | Evidence assessment

Record. Staff reports approximately 310 acres; assessor material gives 309.49 and timber plan 309+. Church Road bisects a northeast portion. Legal description and deed identify a single tax parcel.

Assessment. These approximate acreage differences do not threaten the 1,280-acre cap. An internal road does not categorically bar certification. The authoritative subject boundary and treatment of road edges must still be used consistently in perimeter calculations.

What resolves it. Reconciled legal acreage, road right-of-way ownership and outer perimeter with internal edges addressed.

Relationship. Requirements R01, R02, R17 | Dependency AFI-UNIT | Supports ordinary acreage gate

Correction or remaining obstacle. Additional proof or explanation may resolve

[58, pp.5,36,39-44,49,54,perimeter exhibits;4, (4),(40)]

E08-02 AFI undeveloped and historical condition

Staff-supported | Evidence assessment

Record. Property card reports no assessed buildings/extra features; timber plan and staff review support silvicultural land.

Assessment. No contrary included residence is established here. Zero assessed building value is useful but does not exhaust development under \$380.04. January 2025 imagery and actual earthwork/permit history should underpin the finding.

What resolves it. Dated historical imagery and any actual nonexempt development within the legal description.

Relationship. Requirements R03, R04 | Dependency AFI-UNIT | Supports eligibility with verification limits

Correction or remaining obstacle. Additional proof or explanation may resolve

[58, pp.7-8,49-58;4, (4),(14);6]

E08-03 Ownership affidavit supported by recorded deed

Supported on reviewed documents | Evidence assessment

Record. John Metcalf affidavit identifies AFI ownership on January 1 2025; packet includes 2017 trustee deed O.R.4385/165 and signed notarized affidavit pages.

Assessment. This is affirmative evidence of single ownership, not merely common-officer inference. No contrary ownership/control claim is established in the reviewed packet.

What resolves it. Retain deed/legal-description match; no additional speculative ownership hurdle imposed.

Relationship. Requirements R05 | Dependency AFI-TITLE | Supports common ownership

Correction or remaining obstacle. Additional proof or explanation may resolve

[58, pp.36–44;4, (4)(a)]

E08-04 Agricultural history includes tax, affidavit and plan

Staff-supported | Evidence assessment

Record. Affidavit asserts five-year continuous use and classification since at least 2017; tax record and February 2018 timber plan corroborate commercial forestry intent.

Assessment. This is more than a current tax label. Statute does not require yearly timber harvest. Precise historical execution and proposed-unit coverage remain matters of evidentiary weight.

What resolves it. Defined five-year window and operational corroboration if contested, matched to the entire unit.

Relationship. Requirements R06, R07 | Dependency AFI-AG | Supports agriculture with explicit proof limits

Correction or remaining obstacle. Additional proof or explanation may resolve

[58, pp.8,46–58;5]

E08-05 2018 plan includes previously unmanaged areas

Evidence qualification | Evidence assessment

Record. Plan p.54 says the tract combines managed and unmanaged areas and proposes bringing previously unmaintained portions into timber management.

Assessment. A future-oriented 2018 plan does not alone prove implementation by 2020/2021 or continuous use thereafter. Affidavit and classification strengthen the showing. It is equally wrong to assume unmanaged means permanently nonagricultural or to assume every proposed task occurred.

What resolves it. Dated operations, stand inventory or forester confirmation for the relevant five-year period and included acreage.

Relationship. Requirements R06, R07 | Dependency AFI-AG | Potentially material

Correction or remaining obstacle. Additional historical proof may resolve

[58, pp.46–47,54–58;4, (4)(b);5]

E08-06 Staff reduced applicant perimeter credit

Official adverse adjustment with favorable result | Official staff adjustment

Record. Applicant claims 86.2% existing development; staff credits 78.6%, excluding churches and a northwest agricultural-equipment storage use.

Assessment. Staff did not simply accept every applicant classification. On the reported total this still exceeds 75 by 3.6 percentage points. The adjustment is evidence of classification judgment, not by itself proof either a waiver or flawless compliance.

What resolves it. Staff segment table reproducing 78.6 and precise exclusions.

Relationship. Requirements R08 | Dependency AFI-PERIM | Supports c 1 a if credited segments legally qualify

Correction or remaining obstacle. Additional proof or explanation may resolve

[58, p.9,Exhibit 6;4, (4)(c)1.a]

E08-07 Church exclusions and statutory-category reasoning

Staff-supported interpretation | Staff legal classification

Record. Staff excludes houses of worship as not industrial, commercial or residential development, citing their public-worship category.

Assessment. The enclave statute names three categories and does not expressly list institutional use. Staff's narrower classification is defensible, but a tax classification citation alone is not an exhaustive land-use definition. No need to manufacture a failure from frontage staff already removed.

What resolves it. Retain actual use evidence and clear statutory-category reasoning for consistent treatment of similar parcels.

Relationship. Requirements R08 | Dependency AFI-PERIM | Conservative exclusion already reflected

Correction or remaining obstacle. Additional proof or explanation may resolve

[58, p.9;4, (4)(c)1.a]

E08-08 Agricultural storage exclusion

Staff-supported | Staff factual and classification finding

Record. Staff identifies parcel 029410-0000, permit 12007989 from June 2020, and a 2,520-square-foot building storing equipment for plant cultivation. It excludes that frontage.

Assessment. Physical construction alone does not establish industrial/commercial/residential use. Staff addressed the actual agricultural function. The exclusion is consistent with requiring a named qualifying development category rather than any structure.

What resolves it. Preserve permit/use evidence and measured frontage; compare consistent treatment elsewhere.

Relationship. Requirements R08 | Dependency AFI-PERIM | Conservative exclusion already reflected

Correction or remaining obstacle. Additional proof or explanation may resolve

[58, p.9;4;6]

E08-09 Common-element frontage and route typo

Material classification question and clerical issue | Evidence assessment

Record. Staff narrative tests c 1 a and finds 78.6% existing frontage. Formal finding cites c 1 b and repeatedly transposes 163.3164 to 163.3146. PUD common/conservation tracts appear in adjacent context.

Assessment. A mistaken subsection citation is not automatically a substantive failure when the analysis states its intended route. Correct it, then establish which common tracts count as existing residential development under the same reasoning used for North Palm. If relying on c 1 b instead, satisfy both its distinct conditions.

What resolves it. Corrected route finding, specific credited parcels and actual improvements/use at the historic date.

Relationship. Requirements R08, R10 | Dependency AFI-PERIM | Potentially material

Correction or remaining obstacle. Citation can be corrected; actual qualifying frontage must independently support selected route

[58, pp.6,9-11,Exhibit 6;4, (4)(c)1.a-b;6]

E08-10 AFI across-road and internal-road treatment

Geometry verification needed | Methodological question

Record. Packet identifies Church Road bisecting part of the subject land and neighboring frontage calculations. Applicant total perimeter is 15,826.78 feet.

Assessment. The law's across-road rule supports using opposite parcels where a road lies along the perimeter. It does not settle whether road edges inside an aggregated unit add perimeter. A single consistent topological model is needed; no specific numerical error is established here.

What resolves it. Boundary/ROW overlay and ledger separating external perimeter from internal common/road edges.

Relationship. Requirements R16 | Dependency AFI-UNIT | Potentially material

Correction or remaining obstacle. Additional proof or explanation may resolve

[58, p.5, Exhibit 6;4, final sentence (4)]

E08-11 AFI arithmetic can be checked without endorsing geometry

Reproduced applicant calculation | Arithmetic and stated limitation

Record. Applicant qualifying length 13,649.22 divided by 15,826.78 yields about 86.24%, consistent with reported 86.2%. Staff 78.6% does not include a matching full-precision ledger in its narrative.

Assessment. At the applicant denominator, 3.6 percentage points corresponds to about 569.76 feet of cushion. That is illustrative because staff 78.6 is rounded and may use a different measured total. Do not subtract resident-estimated lengths and call the result an adjudicated failure.

What resolves it. Same denominator and exact staff numerator, line segments and date.

Relationship. Requirements R08 | Dependency AFI-PERIM | Potentially material

Correction or remaining obstacle. Additional proof or explanation may resolve

[58, p.9, Exhibit 6; workbook calculations]

E08-12 AFI service offer satisfies the selected alternative on staff view

Staff-supported | Evidence assessment

Record. Staff says not all facilities are presently available; owner offers binding proportionate-share arrangements for transport/recreation, school and water/wastewater improvements.

Assessment. This is authorized by paragraph d. No independent urban-service adjacency showing is required by c 1 a itself. Importing Heritage's DAB issue into this route would create a nonexistent condition.

What resolves it. Identify operative offers and later project-scale obligations; capacity is not guaranteed for an unspecified larger plan.

Relationship. Requirements R22 | Dependency AFI-SERVICES | Supports statutory service alternative

Correction or remaining obstacle. Additional proof or explanation may resolve

[58, p.11, Exhibit 7;4, (4)(c)1.a,(d)]

E08-13 1.08 gross comparison supported through adjacent development

Staff-supported with scope limit | Textual distinction and staff evidence

Record. Staff cites Six Mile Creek PUD and Trailmark Phase 12 C; directly adjoining tract is conservation. Proposal is 1.08 gross units/acre; nearby SFC standard is 5 units/acre. Draft minutes say board accepted 1.08 gross.

Assessment. Section 163.3162(4)(a) expressly permits an adjacent development comparator, not only an immediately adjoining individual lot. This is a stronger textual basis for the density comparison than automatically counting conservation frontage as existing development under c 1 a. Approval is not a guaranteed 335-home count.

What resolves it. Signed approval/accepted representation; actual gross/net comparator and later development plan yield.

Relationship. Requirements R23 | Dependency AFI-DENSITY | Potentially material

Correction or remaining obstacle. Additional proof or explanation may resolve

[58, p.6, Exhibit 6.7;61, p.9;3, (4)(a),(e)]

E08-14 Other AFI safeguards remain

No established contrary evidence | Evidence assessment

Record. Population is below threshold; ordinary route addresses single-family housing. Staff's adjacent conservation discussion concerns neighboring land.

Assessment. No documented prohibited certified-enclave chaining or protected-area preemption is established here. Neighbor conservation land does not automatically mean the subject land is encumbered. The actual subject title and listed protections must still be respected.

What resolves it. Subject-property easement overlay and adjacent certification register; no speculative restriction invented.

Relationship. Requirements R21, R24, R25, R26 | Dependency AFI-OTHER | No demonstrated additional statutory obstacle

Correction or remaining obstacle. Additional proof or explanation may resolve

[58, pp.6,11–12,39–44;3, (4)(a),(e),(i);10]

E08-15 Approval is recorded but order still needed

Recorded approval with record limit | Recorded procedure

Record. Staff letter says application received August 6, report September 4. September 15 draft minutes record 3–2 approval and 1.08 gross representation.

Assessment. On those dates, report 29 elapsed days and hearing 11 days later are within specified periods. Draft minutes are not a signed certification order. AFI has the strongest affirmative record among these five, but independent certainty about every disputed segment is not established.

What resolves it. Signed certification, final minutes and admitted hearing evidence, including density terms.

Relationship. Requirements R27, R28, R29 | Dependency AFI-PROCESS | Supports approval chronology

Correction or remaining obstacle. Additional proof or explanation may resolve

[58, p.4;61, pp.8–9;3, (4)(b)–(d)]

Requirement coverage for this filing

Question	Status or finding identifiers
R01 Identify the same legal land unit	E08-01
R02 Unincorporated location	E08-01
R03 Undeveloped subject land	E08-02
R04 Historical date and version	E08-02
R05 Single ownership or control	E08-03
R06 Continuous five-year agricultural use	E08-04, E08-05
R07 Good-faith commercial agricultural purpose	E08-04, E08-05
R08 Existing-development route c1a	E08-06, E08-07, E08-08, E08-09, E08-11
R09 Mapped-perimeter route c1b	Not required by selected route
R10 Existing-development component c1b	E08-09
R11 Interstate combination c1c	Not required by selected route
R12 700-acre gate c2	Not required by selected route
R13 FLUM perimeter c2	Not required by selected route
R14 Urban-service perimeter c2	Not required by selected route
R15 Adopted rural study area c3	Not required by selected route
R16 Across-road or water adjacency	E08-10
R17 Ordinary acreage ceiling	E08-01
R18 Expanded acreage residential perimeter	Not required by selected route
R19 Expanded acreage buildout density	Not required by selected route
R20 Expanded acreage water-plan exclusion	Not required by selected route
R21 County population	E08-14
R22 Public-services alternative	E08-12
R23 Adjacent density comparison	E08-13
R24 No certified-enclave chaining	E08-14
R25 Development use and intensity scope	E08-14
R26 Preserved protections	E08-14
R27 Receipt and written report	E08-15
R28 Hearing and 90-day disposition	E08-15
R29 Order and review record	E08-15
R30 Reproducible and fair record	Research/record limitation

9 Filings without complete packets

The public index contains sixteen filing numbers. Withdrawn originals and later replacements are separate administrative records, not necessarily sixteen distinct development tracts. The eleven below have portal descriptions and dated notes, but complete exhibits were not acquired. They are not assigned statutory pass/fail outcomes.

County public-records logs show that copies exist and were produced to other requesters. PRR2026004107 records September 23 links for 10–13, with updated 10,12,13 files. PRR2026004108 records links for 14–16. PRR2026003347 records an August 10 production of 1–8. The public pages do not expose the actual SharePoint links. Public Images pages were checked and did not expose the requested documents in the retrieved response. This is an access limit, not a claim that the county has no records. [69–71]

ENCERT 2026 02 Osceola Lakes

Status in reviewed register: Withdrawn. Reported acres: 143.

E02-01 Full packet not obtained in this research set

Not independently assessed | Coverage limitation

Record. Withdrawn August 11; note posted September 3. Original 143-acre filing. Public portal establishes filing identity; no complete application exhibits were acquired for this filing.

Assessment. No statutory pass or substantive failure is assigned. A withdrawal does not prove ineligibility, and a pending filing is not an approval. Replacement names or acreage changes alone do not prove an evasive boundary strategy.

What resolves it. Full initial packet, every supplement/version, reports, withdrawal/order if any, and native maps. Request actual final submitted proposal and withdrawal; compare with later Osceola North/South boundaries.

Relationship. Requirements R01, R30 | Dependency 02-COVERAGE | Prevents merits conclusion

Correction or remaining obstacle. Obtain existing public records

[73;64;71]

E02-02 Dated proposal-density note

Portal observation only | Official administrative note

Record. July 10: Requested density does not appear to be stated; staff lists 6 units/acre adjacent RES-C base density.

Assessment. This is a dated administrative note, not an independent reading of the final packet. Later submissions may cure or clarify it. A known neighboring maximum does not alone identify the proposal or settle net/gross comparison. For King, 1 DU/acre is a stated proposal, not proof an adjacent comparator permits it.

What resolves it. Request actual final submitted proposal and withdrawal; compare with later Osceola North/South boundaries.

Relationship. Requirements R23, R25 | Dependency 02-PROPOSAL | Triage issue, not adjudicated failure

Correction or remaining obstacle. Latest proposal/comparator may resolve

[73, dated notes/description;3, (4)(a),(e),(h)]

E02-03 Application version and receipt chronology

Records needed | Procedural triage

Record. Portal issue/payment/routing notes are administrative timestamps. Withdrawn August 11; note posted September 3. Original 143-acre filing.

Assessment. Earlier withdrawal does not automatically settle legal effect of a later application; a smaller replacement can change acreage, perimeter, agricultural footprint and historic unit simultaneously. No deadline violation or default certification is inferred without receipt/report/action records.

What resolves it. Receipt acknowledgment, fee payment, initial report delivery, all supplements, any withdrawals and hearing/decision record.

Relationship. Requirements R04, R27, R28 | Dependency 02-COVERAGE | Potentially material

Correction or remaining obstacle. Obtain exact procedural record

[73;3, (4)(b)–(d);4, (4)]

ENCERT 2026 03 Adler Creek original

Status in reviewed register: Withdrawn. Reported acres: 610.

E03-01 Full packet not obtained in this research set

Not independently assessed | Coverage limitation

Record. Withdrawn August 10. Original 610-acre filing, related to prior Adler Creek PUD. Public portal establishes filing identity; no complete application exhibits were acquired for this filing.

Assessment. No statutory pass or substantive failure is assigned. A withdrawal does not prove ineligibility, and a pending filing is not an approval. Replacement names or acreage changes alone do not prove an evasive boundary strategy.

What resolves it. Full initial packet, every supplement/version, reports, withdrawal/order if any, and native maps. Obtain original and replacement boundaries, prior application history and proposed use/density.

Relationship. Requirements R01, R30 | Dependency 03-COVERAGE | Prevents merits conclusion

Correction or remaining obstacle. Obtain existing public records

[74;64;71]

E03-02 Dated proposal-density note

Portal observation only | Official administrative note

Record. July 10: Applicant has not stated requested density, intensity or use; staff lists 6 dwelling units/acre.

Assessment. This is a dated administrative note, not an independent reading of the final packet. Later submissions may cure or clarify it. A known neighboring maximum does not alone identify the proposal or settle net/gross comparison. For King, 1 DU/acre is a stated proposal, not proof an adjacent comparator permits it.

What resolves it. Obtain original and replacement boundaries, prior application history and proposed use/density.

Relationship. Requirements R23, R25 | Dependency 03-PROPOSAL | Triage issue, not adjudicated failure

Correction or remaining obstacle. Latest proposal/comparator may resolve

[74, dated notes/description;3, (4)(a),(e),(h)]

E03-03 Application version and receipt chronology

Records needed | Procedural triage

Record. Portal issue/payment/routing notes are administrative timestamps. Withdrawn August 10. Original 610-acre filing, related to prior Adler Creek PUD.

Assessment. Earlier withdrawal does not automatically settle legal effect of a later application; a smaller replacement can change acreage, perimeter, agricultural footprint and historic unit simultaneously. No deadline violation or default certification is inferred without receipt/report/action records.

What resolves it. Receipt acknowledgment, fee payment, initial report delivery, all supplements, any withdrawals and hearing/decision record.

Relationship. Requirements R04, R27, R28 | Dependency 03-COVERAGE | Potentially material

Correction or remaining obstacle. Obtain exact procedural record

[74;3, (4)(b)-(d);4, (4)]

ENCERT 2026 04 Star IV original

Status in reviewed register: Withdrawn. Reported acres: 176.

E04-01 Full packet not obtained in this research set

Not independently assessed | Coverage limitation

Record. Withdrawn August 7. Original 176-acre Star IV filing. Public portal establishes filing identity; no complete application exhibits were acquired for this filing.

Assessment. No statutory pass or substantive failure is assigned. A withdrawal does not prove ineligibility, and a pending filing is not an approval. Replacement names or acreage changes alone do not prove an evasive boundary strategy.

What resolves it. Full initial packet, every supplement/version, reports, withdrawal/order if any, and native maps. Obtain withdrawal and replacement 70.83-acre unit; compare included/excluded land and historical conditions.

Relationship. Requirements R01, R30 | Dependency 04-COVERAGE | Prevents merits conclusion

Correction or remaining obstacle. Obtain existing public records

[75;64;71]

E04-02 Dated proposal-density note

Portal observation only | Official administrative note

Record. July 21: Applicant did not state requested density; staff lists 6 units/acre.

Assessment. This is a dated administrative note, not an independent reading of the final packet. Later submissions may cure or clarify it. A known neighboring maximum does not alone identify the proposal or settle net/gross comparison. For King, 1 DU/acre is a stated proposal, not proof an adjacent comparator permits it.

What resolves it. Obtain withdrawal and replacement 70.83-acre unit; compare included/excluded land and historical conditions.

Relationship. Requirements R23, R25 | Dependency 04-PROPOSAL | Triage issue, not adjudicated failure

Correction or remaining obstacle. Latest proposal/comparator may resolve

[75, dated notes/description;3, (4)(a),(e),(h)]

E04-03 Application version and receipt chronology

Records needed | Procedural triage

Record. Portal issue/payment/routing notes are administrative timestamps. Withdrawn August 7. Original 176-acre Star IV filing.

Assessment. Earlier withdrawal does not automatically settle legal effect of a later application; a smaller replacement can change acreage, perimeter, agricultural footprint and historic unit simultaneously. No deadline violation or default certification is inferred without receipt/report/action records.

What resolves it. Receipt acknowledgment, fee payment, initial report delivery, all supplements, any withdrawals and hearing/decision record.

Relationship. Requirements R04, R27, R28 | Dependency 04-COVERAGE | Potentially material

Correction or remaining obstacle. Obtain exact procedural record

[75;3, (4)(b)-(d);4, (4)]

ENCERT 2026 09 Entrada

Status in reviewed register: Withdrawn. Reported acres: 51.34.

E09-01 Full packet not obtained in this research set

Not independently assessed | Coverage limitation

Record. Withdrawn September 16. Entrada 51.34-acre filing. Public portal establishes filing identity; no complete application exhibits were acquired for this filing.

Assessment. No statutory pass or substantive failure is assigned. A withdrawal does not prove ineligibility, and a pending filing is not an approval. Replacement names or acreage changes alone do not prove an evasive boundary strategy.

What resolves it. Full initial packet, every supplement/version, reports, withdrawal/order if any, and native maps. Obtain full proposal, supplements, withdrawal and any written report; October 6 tentative hearing is not a completed hearing.

Relationship. Requirements R01, R30 | Dependency 09-COVERAGE | Prevents merits conclusion

Correction or remaining obstacle. Obtain existing public records

[80;64]

E09-02 Dated proposal-density note

Portal observation only | Official administrative note

Record. September 2: Requested density unknown; staff lists 6 units/acre without optional increases.

Assessment. This is a dated administrative note, not an independent reading of the final packet. Later submissions may cure or clarify it. A known neighboring maximum does not alone identify the proposal or settle net/gross comparison. For King, 1 DU/acre is a stated proposal, not proof an adjacent comparator permits it.

What resolves it. Obtain full proposal, supplements, withdrawal and any written report; October 6 tentative hearing is not a completed hearing.

Relationship. Requirements R23, R25 | Dependency 09-PROPOSAL | Triage issue, not adjudicated failure

Correction or remaining obstacle. Latest proposal/comparator may resolve

[80, dated notes/description;3, (4)(a),(e),(h)]

E09-03 Application version and receipt chronology

Records needed | Procedural triage

Record. Portal issue/payment/routing notes are administrative timestamps. Withdrawn September 16. Entrada 51.34-acre filing.

Assessment. Earlier withdrawal does not automatically settle legal effect of a later application; a smaller replacement can change acreage, perimeter, agricultural footprint and historic unit simultaneously. No deadline violation or default certification is inferred without receipt/report/action records.

What resolves it. Receipt acknowledgment, fee payment, initial report delivery, all supplements, any withdrawals and hearing/decision record.

Relationship. Requirements R04, R27, R28 | Dependency 09-COVERAGE | Potentially material

Correction or remaining obstacle. Obtain exact procedural record

[80;3, (4)(b)-(d);4, (4)]

E09-04 Entrada clock appears keyed to fee receipt

Specific procedural question | Verified dated portal note

Record. August 12 note says 30-day review will not start until fee received; August 13 note says fee paid August 12, review starts August 13, report due September 11, hearing by October 11, tentatively October 6.

Assessment. The statute's receipt language and the portal's fee-based clock require reconciliation. There may be a valid distinction between preliminary materials and receipt of an application; this research did not obtain the underlying transmissions. Withdrawal September 16 complicates any later default claim.

What resolves it. Actual first application receipt, fee demand/receipt, completeness record, report delivery and withdrawal.

Relationship. Requirements R27, R28 | Dependency 09-CLOCK | Potentially material

Correction or remaining obstacle. Additional proof or explanation may resolve

[80, August 12–13 and September 16 notes;3, (4)(b)–(c)]

ENCERT 2026 10 Adler Creek replacement

Status in reviewed register: Unresolved. Reported acres: 594.42.

E10-01 Full packet not obtained in this research set

Not independently assessed | Coverage limitation

Record. Replacement 594.42-acre Adler Creek filing, issued September 1; no final disposition established at cutoff. Public portal establishes filing identity; no complete application exhibits were acquired for this filing.

Assessment. No statutory pass or substantive failure is assigned. A withdrawal does not prove ineligibility, and a pending filing is not an approval. Replacement names or acreage changes alone do not prove an evasive boundary strategy.

What resolves it. Full initial packet, every supplement/version, reports, withdrawal/order if any, and native maps. Match ordinance/legal description and later amendments to proposed unit; obtain September 23 updated production.

Relationship. Requirements R01, R30 | Dependency 10-COVERAGE | Prevents merits conclusion

Correction or remaining obstacle. Obtain existing public records

[81;64;69]

E10-02 Dated proposal-density note

Portal observation only | Official administrative note

Record. September 9: No requested density; staff cites Ordinance 2021-87 limiting subject property to 1,682 residential units.

Assessment. This is a dated administrative note, not an independent reading of the final packet. Later submissions may cure or clarify it. A known neighboring maximum does not alone identify the proposal or settle net/gross comparison. For King, 1 DU/acre is a stated proposal, not proof an adjacent comparator permits it.

What resolves it. Match ordinance/legal description and later amendments to proposed unit; obtain September 23 updated production.

Relationship. Requirements R23, R25 | Dependency 10-PROPOSAL | Triage issue, not adjudicated failure

Correction or remaining obstacle. Latest proposal/comparator may resolve

[81, dated notes/description;3, (4)(a),(e),(h)]

E10-03 Application version and receipt chronology

Records needed | Procedural triage

Record. Portal issue/payment/routing notes are administrative timestamps. Replacement 594.42-acre Adler Creek filing, issued September 1; no final disposition established at cutoff.

Assessment. Earlier withdrawal does not automatically settle legal effect of a later application; a smaller replacement can change acreage, perimeter, agricultural footprint and historic unit simultaneously. No deadline violation or default certification is inferred without receipt/report/action records.

What resolves it. Receipt acknowledgment, fee payment, initial report delivery, all supplements, any withdrawals and hearing/decision record.

Relationship. Requirements R04, R27, R28 | Dependency 10-COVERAGE | Potentially material

Correction or remaining obstacle. Obtain exact procedural record

[81;3, (4)(b)-(d);4, (4)]

E10-04 Adler prior plan amendment is directly relevant

Primary ordinance retrieved | Primary local law plus unresolved application match

Record. Ordinance 2021-87 adopted December 7 2021 concerns approximately 733 acres and contains a residential cap in ExhibitC. Portal ties the replacement filing to this instrument.

Assessment. The original 2021 ordinance is now available; that improves on relying only on a portal summary. It does not establish all later amendments, geographic overlap, the proposed 594.42-acre unit's allocation or the correct SB686 adjacent comparator. Earlier subject-land development applications also matter to the statutory agricultural lookback analysis.

What resolves it. Boundary/entitlement allocation and amendment history; original COMPAMD2020-02 and PUD2021-21 filing dates and scope; exact current proposed use.

Relationship. Requirements R04, R06, R23 | Dependency 10-PROPOSAL | Potentially material

Correction or remaining obstacle. Additional proof or explanation may resolve

[68, Exhibit C;81;4, (4)(b);3, (4)(a)]

ENCERT 2026 11 Carter Road

Status in reviewed register: Unresolved. Reported acres: 200.75.

E11-01 Full packet not obtained in this research set

Not independently assessed | Coverage limitation

Record. Carter Road 200.75-acre filing, issued September 1; no final disposition established at cutoff. Public portal establishes filing identity; no complete application exhibits were acquired for this filing.

Assessment. No statutory pass or substantive failure is assigned. A withdrawal does not prove ineligibility, and a pending filing is not an approval. Replacement names or acreage changes alone do not prove an evasive boundary strategy.

What resolves it. Full initial packet, every supplement/version, reports, withdrawal/order if any, and native maps. Obtain actual proposal, adjacent comparator and full packet produced through PRR4107.

Relationship. Requirements R01, R30 | Dependency 11-COVERAGE | Prevents merits conclusion

Correction or remaining obstacle. Obtain existing public records

[82;64;69]

E11-02 Dated proposal-density note

Portal observation only | Official administrative note

Record. September 9: Requested density not specified; staff lists 13 units/acre.

Assessment. This is a dated administrative note, not an independent reading of the final packet. Later submissions may cure or clarify it. A known neighboring maximum does not alone identify the proposal or settle net/gross comparison. For King, 1 DU/acre is a stated proposal, not proof an adjacent comparator permits it.

What resolves it. Obtain actual proposal, adjacent comparator and full packet produced through PRR4107.

Relationship. Requirements R23, R25 | Dependency 11-PROPOSAL | Triage issue, not adjudicated failure

Correction or remaining obstacle. Latest proposal/comparator may resolve

[82, dated notes/description;3, (4)(a),(e),(h)]

E11-03 Application version and receipt chronology

Records needed | Procedural triage

Record. Portal issue/payment/routing notes are administrative timestamps. Carter Road 200.75-acre filing, issued September 1; no final disposition established at cutoff.

Assessment. Earlier withdrawal does not automatically settle legal effect of a later application; a smaller replacement can change acreage, perimeter, agricultural footprint and historic unit simultaneously. No deadline violation or default certification is inferred without receipt/report/action records.

What resolves it. Receipt acknowledgment, fee payment, initial report delivery, all supplements, any withdrawals and hearing/decision record.

Relationship. Requirements R04, R27, R28 | Dependency 11-COVERAGE | Potentially material

Correction or remaining obstacle. Obtain exact procedural record

[82;3, (4)(b)–(d);4, (4)]

ENCERT 2026 12 Star IV replacement

Status in reviewed register: Unresolved. Reported acres: 70.83.

E12-01 Full packet not obtained in this research set

Not independently assessed | Coverage limitation

Record. Replacement 70.83-acre Star IV filing, issued September 1; no final disposition established at cutoff. Public portal establishes filing identity; no complete application exhibits were acquired for this filing.

Assessment. No statutory pass or substantive failure is assigned. A withdrawal does not prove ineligibility, and a pending filing is not an approval. Replacement names or acreage changes alone do not prove an evasive boundary strategy.

What resolves it. Full initial packet, every supplement/version, reports, withdrawal/order if any, and native maps. Obtain September 23 updated production and original/replacement spatial crosswalk.

Relationship. Requirements R01, R30 | Dependency 12-COVERAGE | Prevents merits conclusion

Correction or remaining obstacle. Obtain existing public records

[83;64;69]

E12-02 Dated proposal-density note

Portal observation only | Official administrative note

Record. September 4: No requested density stated; staff lists 6 units/acre.

Assessment. This is a dated administrative note, not an independent reading of the final packet. Later submissions may cure or clarify it. A known neighboring maximum does not alone identify the proposal or settle net/gross comparison. For King, 1 DU/acre is a stated proposal, not proof an adjacent comparator permits it.

What resolves it. Obtain September 23 updated production and original/replacement spatial crosswalk.

Relationship. Requirements R23, R25 | Dependency 12-PROPOSAL | Triage issue, not adjudicated failure

Correction or remaining obstacle. Latest proposal/comparator may resolve

[83; dated notes/description; 3, (4)(a),(e),(h)]

E12-03 Application version and receipt chronology

Records needed | Procedural triage

Record. Portal issue/payment/routing notes are administrative timestamps. Replacement 70.83-acre Star IV filing, issued September 1; no final disposition established at cutoff.

Assessment. Earlier withdrawal does not automatically settle legal effect of a later application; a smaller replacement can change acreage, perimeter, agricultural footprint and historic unit simultaneously. No deadline violation or default certification is inferred without receipt/report/action records.

What resolves it. Receipt acknowledgment, fee payment, initial report delivery, all supplements, any withdrawals and hearing/decision record.

Relationship. Requirements R04, R27, R28 | Dependency 12-COVERAGE | Potentially material

Correction or remaining obstacle. Obtain exact procedural record

[83; 3, (4)(b)-(d); 4, (4)]

ENCERT 2026 13 Pacetti Oaks

Status in reviewed register: Unresolved. Reported acres: 40.5.

E13-01 Full packet not obtained in this research set

Not independently assessed | Coverage limitation

Record. Pacetti Oaks 40.5-acre filing at 3975 Pacetti Road; no final disposition established at cutoff. Public portal establishes filing identity; no complete application exhibits were acquired for this filing.

Assessment. No statutory pass or substantive failure is assigned. A withdrawal does not prove ineligibility, and a pending filing is not an approval. Replacement names or acreage changes alone do not prove an evasive boundary strategy.

What resolves it. Full initial packet, every supplement/version, reports, withdrawal/order if any, and native maps. Determine whether proposal incorporates a sufficiently definite comparator and gross/net base; obtain September 23 updated production.

Relationship. Requirements R01, R30 | Dependency 13-COVERAGE | Prevents merits conclusion

Correction or remaining obstacle. Obtain existing public records

[84; 64; 69]

E13-02 Dated proposal-density note

Portal observation only | Official administrative note

Record. September 8: Requested density is not exceeding maximum allowable; staff lists 5 DUs/acre, Six Mile Creek North Phase 1.

Assessment. This is a dated administrative note, not an independent reading of the final packet. Later submissions may cure or clarify it. A known neighboring maximum does not alone identify the proposal or settle net/gross comparison. For King, 1 DU/acre is a stated proposal, not proof an adjacent comparator permits it.

What resolves it. Determine whether proposal incorporates a sufficiently definite comparator and gross/net base; obtain September 23 updated production.

Relationship. Requirements R23, R25 | Dependency 13-PROPOSAL | Triage issue, not adjudicated failure

Correction or remaining obstacle. Latest proposal/comparator may resolve

[84, dated notes/description;3, (4)(a),(e),(h)]

E13-03 Application version and receipt chronology

Records needed | Procedural triage

Record. Portal issue/payment/routing notes are administrative timestamps. Pacetti Oaks 40.5-acre filing at 3975 Pacetti Road; no final disposition established at cutoff.

Assessment. Earlier withdrawal does not automatically settle legal effect of a later application; a smaller replacement can change acreage, perimeter, agricultural footprint and historic unit simultaneously. No deadline violation or default certification is inferred without receipt/report/action records.

What resolves it. Receipt acknowledgment, fee payment, initial report delivery, all supplements, any withdrawals and hearing/decision record.

Relationship. Requirements R04, R27, R28 | Dependency 13-COVERAGE | Potentially material

Correction or remaining obstacle. Obtain exact procedural record

[84;3, (4)(b)-(d);4, (4)]

ENCERT 2026 14 Osceola North

Status in reviewed register: Unresolved. Reported acres: 103.

E14-01 Full packet not obtained in this research set

Not independently assessed | Coverage limitation

Record. Osceola North issued September 14; no final disposition established at cutoff. Public portal establishes filing identity; no complete application exhibits were acquired for this filing.

Assessment. No statutory pass or substantive failure is assigned. A withdrawal does not prove ineligibility, and a pending filing is not an approval. Replacement names or acreage changes alone do not prove an evasive boundary strategy.

What resolves it. Full initial packet, every supplement/version, reports, withdrawal/order if any, and native maps. Obtain produced packet and updated description; compare original Osceola and South, common control, adjacency and exclusions.

Relationship. Requirements R01, R30 | Dependency 14-COVERAGE | Prevents merits conclusion

Correction or remaining obstacle. Obtain existing public records

[85;64;70]

E14-02 Dated proposal-density note

Portal observation only | Official administrative note

Record. September 30: Portal description identifies about 103 acres and three parcels; reviewed notes do not establish a requested density.

Assessment. This is a dated administrative note, not an independent reading of the final packet. Later submissions may cure or clarify it. A known neighboring maximum does not alone identify the proposal or settle net/gross comparison. For King, 1 DU/acre is a stated proposal, not proof an adjacent comparator permits it.

What resolves it. Obtain produced packet and updated description; compare original Osceola and South, common control, adjacency and exclusions.

Relationship. Requirements R23, R25 | Dependency 14-PROPOSAL | Triage issue, not adjudicated failure

Correction or remaining obstacle. Latest proposal/comparator may resolve

[85, dated notes/description;3, (4)(a),(e),(h)]

E14-03 Application version and receipt chronology

Records needed | Procedural triage

Record. Portal issue/payment/routing notes are administrative timestamps. Osceola North issued September 14; no final disposition established at cutoff.

Assessment. Earlier withdrawal does not automatically settle legal effect of a later application; a smaller replacement can change acreage, perimeter, agricultural footprint and historic unit simultaneously. No deadline violation or default certification is inferred without receipt/report/action records.

What resolves it. Receipt acknowledgment, fee payment, initial report delivery, all supplements, any withdrawals and hearing/decision record.

Relationship. Requirements R04, R27, R28 | Dependency 14-COVERAGE | Potentially material

Correction or remaining obstacle. Obtain exact procedural record

[85;3, (4)(b)-(d);4, (4)]

ENCERT 2026 15 Osceola South

Status in reviewed register: Unresolved. Reported acres: not established.

E15-01 Full packet not obtained in this research set

Not independently assessed | Coverage limitation

Record. Issued September 14; no final disposition established at cutoff. Public portal establishes filing identity; no complete application exhibits were acquired for this filing.

Assessment. No statutory pass or substantive failure is assigned. A withdrawal does not prove ineligibility, and a pending filing is not an approval. Replacement names or acreage changes alone do not prove an evasive boundary strategy.

What resolves it. Full initial packet, every supplement/version, reports, withdrawal/order if any, and native maps. Obtain actual legal description, acreage, proposal and relation to North/original filing.

Relationship. Requirements R01, R30 | Dependency 15-COVERAGE | Prevents merits conclusion

Correction or remaining obstacle. Obtain existing public records

[86;64;70]

E15-02 Dated proposal-density note

Portal observation only | Official administrative note

Record. September 30 snapshot: Reviewed description identifies a single-parcel Osceola South request without a verified acreage/density in this research.

Assessment. This is a dated administrative note, not an independent reading of the final packet. Later submissions may cure or clarify it. A known neighboring maximum does not alone identify the proposal or settle net/gross comparison. For King, 1 DU/acre is a stated proposal, not proof an adjacent comparator permits it.

What resolves it. Obtain actual legal description, acreage, proposal and relation to North/original filing.

Relationship. Requirements R23, R25 | Dependency 15-PROPOSAL | Triage issue, not adjudicated failure

Correction or remaining obstacle. Latest proposal/comparator may resolve

[86, dated notes/description;3, (4)(a),(e),(h)]

E15-03 Application version and receipt chronology

Records needed | Procedural triage

Record. Portal issue/payment/routing notes are administrative timestamps. Issued September 14; no final disposition established at cutoff.

Assessment. Earlier withdrawal does not automatically settle legal effect of a later application; a smaller replacement can change acreage, perimeter, agricultural footprint and historic unit simultaneously. No deadline violation or default certification is inferred without receipt/report/action records.

What resolves it. Receipt acknowledgment, fee payment, initial report delivery, all supplements, any withdrawals and hearing/decision record.

Relationship. Requirements R04, R27, R28 | Dependency 15-COVERAGE | Potentially material

Correction or remaining obstacle. Obtain exact procedural record

[86;3, (4)(b)-(d);4, (4)]

ENCERT 2026 16 King

Status in reviewed register: Unresolved. Reported acres: 36.626.

E16-01 Full packet not obtained in this research set

Not independently assessed | Coverage limitation

Record. Issued September 21 and routed September 22; no final disposition established at cutoff. Public portal establishes filing identity; no complete application exhibits were acquired for this filing.

Assessment. No statutory pass or substantive failure is assigned. A withdrawal does not prove ineligibility, and a pending filing is not an approval. Replacement names or acreage changes alone do not prove an evasive boundary strategy.

What resolves it. Full initial packet, every supplement/version, reports, withdrawal/order if any, and native maps. Obtain packet, historical agricultural/undeveloped/control evidence and adjacent density authorization. A final subdivision plan is not universally required for certification.

Relationship. Requirements R01, R30 | Dependency 16-COVERAGE | Prevents merits conclusion

Correction or remaining obstacle. Obtain existing public records

[87;64;70]

E16-02 Dated proposal-density note

Portal observation only | Official administrative note

Record. September 30 snapshot: King request identifies 36.626 acres at 9400 Byrd Road, parcel 049530-0000, proposed 1 single-family dwelling/acre; no final subdivision plan is supplied in the portal description.

Assessment. This is a dated administrative note, not an independent reading of the final packet. Later submissions may cure or clarify it. A known neighboring maximum does not alone identify the proposal or settle net/gross comparison. For King, 1 DU/acre is a stated proposal, not proof an adjacent comparator permits it.

What resolves it. Obtain packet, historical agricultural/undeveloped/control evidence and adjacent density authorization. A final subdivision plan is not universally required for certification.

Relationship. Requirements R23, R25 | Dependency 16-PROPOSAL | Triage issue, not adjudicated failure

Correction or remaining obstacle. Latest proposal/comparator may resolve

[87, dated notes/description;3, (4)(a),(e),(h)]

E16-03 Application version and receipt chronology

Records needed | Procedural triage

Record. Portal issue/payment/routing notes are administrative timestamps. Issued September 21 and routed September 22; no final disposition established at cutoff.

Assessment. Earlier withdrawal does not automatically settle legal effect of a later application; a smaller replacement can change acreage, perimeter, agricultural footprint and historic unit simultaneously. No deadline violation or default certification is inferred without receipt/report/action records.

What resolves it. Receipt acknowledgment, fee payment, initial report delivery, all supplements, any withdrawals and hearing/decision record.

Relationship. Requirements R04, R27, R28 | Dependency 16-COVERAGE | Potentially material

Correction or remaining obstacle. Obtain exact procedural record

[87;3, (4)(b)–(d);4, (4)]

10 Arithmetic and chronology

The workbook retains numeric inputs and formulas. A reproduced quotient establishes arithmetic on stated inputs; it does not validate survey geometry, historical land use, statutory denominator or legal eligibility. Conditional subtraction scenarios are expressly identified. No failure totals are calculated.

C01 West narrative ratio

$25,893.07 \div 32,355.62 = 80.02650\%$. Comparison threshold: 75%.

Narrative claims 80.59%; reproduced ratio about 80.03%. Qualifying urban-service status unresolved. [56,p.20]

C02 West map ratio

$25,893.07 \div 32,132.32 = 80.58263\%$. Comparison threshold: 75%.

Map sum $11167.66 + 4433.75 + 10291.66 + 6239.25$; staff 80.61% differs. [56,pp.10,38]

C03 East FLUM ratio

$17,502.93 \div 25,344.70 = 69.05953\%$. Comparison threshold: 50%.

c 2 FLUM test only; mapped-use eligibility still requires valid historical source. [55,p.20]

C04 East applicant urban-service ratio

$19,768.86 \div 25,344.70 = 77.99998\%$. Comparison threshold: 50%.

Applicant 78%; staff 78.37%. Conditional on urban-service legal classification. [55,pp.10,20]

C05 North applicant mapped/buildout frontage

$49,101.27 \div 58,166.76 = 84.41466\%$. Comparison threshold: 75%.

Same length is offered for different statutory tests; it is not proof every segment satisfies both. [54,pp.270,301]

C06 North applicant existing frontage

$29,595.54 \div 58,166.76 = 50.88050\%$. Comparison threshold: 50%.

Applicant frontage method only; c 1 b legal denominator is disputed. [54,Exhibit 8;pp.781,812]

C07 North less 750 ft conditional scenario

$28,845.54 \div 58,166.76 = 49.59111\%$. Comparison threshold: 50%.

750 ft resident challenge, not an independently verified exclusion. No legal failure inferred. [54,pp.797–798,812–813]

C08 North less 1285 ft conditional scenario

$28,310.54 \div 58,166.76 = 48.67134\%$. Comparison threshold: 50%.

Resident nine-parcel scenario; separate resident measurement about 1258.6 ft is not silently substituted. [54,pp.683,810–813]

C09 AFI applicant ratio

$13,649.22 \div 15,826.78 = 86.24129\%$. Comparison threshold: 75%.

Applicant claim; staff reduces qualifying share to 78.6%. [58,Exhibit 6;p.9]

Additional checks: West narrative total 32,355.62 minus map sum 32,132.32 equals 223.30 feet. North submitted 4,462.09 is 17.91 acres below 4,480; the objector's 4,568.95 whole-parcel scenario is 88.95 above. Sandy forest-plan

hay 157.20 minus described agreement 105.30 equals 51.90 acres. These differences require explanations and are not standalone legal verdicts. [56,p.20,38;54,pp.834–837;57,pp.129,131]

Filing	Receipt basis	Report	Days	First hearing	Days	Action
01	2026-07-01	2026-07-31	30	2026-08-19	19	Denial vote 2026-09-15
05	2026-07-07	2026-07-31	24	2026-08-19	19	Initial approval 2026-08-19
06	2026-07-07	2026-07-31	24	2026-08-19	19	Initial approval 2026-08-19
07	2026-08-05	2026-09-04	30	2026-09-15	11	Withdrawal 2026-09-15
08	2026-08-06	2026-09-04	29	2026-09-15	11	Approval vote 2026-09-15

Elapsed days exclude the receipt/report date and use the displayed staff-letter dates. They are an audit aid, not a determination of legal service, calendar computation, tolling, withdrawal effect or appellate deadlines. For North Palm the first hearing was August 19; later continuances are not silently substituted for it.

ENCERT 01: Continuances to September 1 and 15; final written order/rendition not obtained. [54,p.5;59–61]

ENCERT 05: September 28 reversal is a separate procedural event; final orders not obtained. [55,p.4;59]

ENCERT 06: September 28 reversal separate; no conclusion on reconsideration authority. [56,p.4;59]

ENCERT 07: Scheduled hearing/withdrawal not merits adjudication; later supplement not fully reviewed in initial letter. [57,p.4;61,p.8]

ENCERT 08: Portal issue date and packet cover may differ; receipt here uses staff letter. Draft minutes status retained. [58,p.4;61,p.9]

11 Records needed to close the gaps

Q01 ENCERT02,03,04 initial and final withdrawn packets

Determine actual submitted proposal and whether dated density omissions were cured.

Retrieval lead. Existing production PRR2026003347 says all 1–8 links were emailed August 10; obtain copies/links and later supplements.

[71;73–75]

Q02 ENCERT09 Entrada complete file

Density, receipt/fee timing and withdrawal need actual record.

Retrieval lead. County Growth Management/records custodian; portal file 09 and September 16 withdrawal.

[80]

Q03 ENCERT10–13 all versions through cutoff

Later submissions may supersede early September density notes.

Retrieval lead. PRR2026004107 September 23 production; expressly updated 10,12,13; actual links not publicly exposed.

[69;81–84]

Q04 ENCERT14–16 complete files

No full packet means no defensible merits determination.

Retrieval lead. PRR2026004108 September 23 production; links stated to expire January 11 2027; actual links not exposed.

[70;85–87]

Q05 Signed certification/denial/withdrawal instruments and rendition

Verify operative disposition, density terms and review timelines.

Retrieval lead. Clerk Board Records and Growth Management for 01,05,06,07,08, including August 19/September 15/September 28.

[53;59–64]

Q06 Hearing audio/transcript and all admitted supplemental exhibits

Agenda packet may precede evidence received at hearing.

Retrieval lead. Clerk historical regular/special BoCC records; authenticated recordings or transcript for August 19, September 1, September 15, September 28.

[53;59–63]

Q07 County GIS segment calculations and historical layers

Reproduce narrow margins and validate the statutory qualifying units/date.

Retrieval lead. Native project files, coordinate system, perimeter/adjacency exports, January 2025 FLUM/zoning/parcel/improvement layers and analyst notes.

[54–58]

Q08 Adopted historical plan, CIE and urban service evidence

Resolve DAB functional definition, version and counted parcels.

Retrieval lead. Certified January 1 2025 and relevant 2026 plan/maps; adoption/effective dates; facilities/capacity/road evidence or specific CIE entries.

[14-17;65-66]

Q09 Agricultural classification underlying files and forestry operations

Test actual footprint/period rather than tax label alone.

Retrieval lead. Property Appraiser classification applications, inspections and acreage; dated forester/operator records for each case.

[54-58;5]

Q10 Original title/unit/exclusion documentation

Resolve historic boundaries, control and excluded homesites/acreage.

Retrieval lead. Deeds, title reports, control instruments, survey/sketch native geometry and exclusions for each submitted unit.

[54-58;4,(40)]

Q11 Heritage executed West affidavit and record-incorporation evidence

Resolve blank notarial copy without inferring false historical facts.

Retrieval lead. Original executed affidavit, later replacement and hearing exhibit list; compare executed East copy.

[55,p.35;56,p.35;63,p.35]

Q12 North Palm Corps permit and recorded restrictions

Determine actual completed work and retained protections within the unit.

Retrieval lead. SAJ-2010-03676 full permit/plans/modifications; O.R.3824/174-175; completion and separate conservation instruments.

[54,pp.712-715]

Q13 Jacksonville neighboring entitlement effective record

Resolve authorized residential density, historical map use and conditions.

Retrieval lead. Ordinances 2024-342-E/344-E, effective/compliance notices, master plan status and applicable residential areas.

[54,Exhibit 10 appendix]

Q14 Heritage and any other enclave court docket

Distinguish petitions, interim orders and merits holdings.

Retrieval lead. Official Clerk case documents and signed orders; do not treat news of a petition as a holding.

[25;53]

Prepared records request text

Draft only. It has not been transmitted to the county or any other person.

Please provide the complete existing electronic records for ENCERT2026-01 through 2026-16 as of September 30 2026, including the original applications, exhibits, legal descriptions, affidavits, maps and native GIS/perimeter calculations; all supplements and replacements with received dates; written staff reports and delivery records; application/fee receipt records; withdrawal letters; signed certification/denial/reconsideration orders and rendition records; and all exhibits admitted at regular or special BoCC hearings on August 19, September 1, September 15 and September 28. Please retain separate versions rather than replacing earlier submissions with a consolidated latest copy.

For previously produced files, copies of the documents or current access links corresponding to PRR2026003347, 2026004107 and 2026004108 would satisfy the overlapping portion. Please also identify any records withheld or unavailable and their governing basis. For historical plan and GIS materials, please provide the adopted versions/effective dates relevant to January 1 2025 and the later decisions, including the CIE entries and facilities evidence relied upon for the urban-service-area determinations. This request seeks existing records, not a newly created legal opinion or survey.

12 Audit method and corrections

This inventory is an expanded companion to the 50-page monograph. It adds a structured observation register, complete extraction coverage of the five selected packet PDFs, eleven dated portal triage records, primary infrastructure-plan text, a primary appellate opinion comparison, and the original Adler plan amendment. The main narrative's earlier West map calculation remains arithmetically correct; this edition adds the previously unreported narrative denominator discrepancy and should control on that detail.

The file completeness claim is deliberately narrow: 1,239 pages were processed for text; 956 used OCR and 283 native extraction. Seventy-two pages remained sparse after extraction under the working threshold of 80 characters. Blank sheets, maps and image-heavy exhibits can all be sparse. No statement is made that every page was visually authenticated. Selected decisive images—including affidavit execution and perimeter exhibits—were checked. The workbook includes the page-level coverage manifest.

Selected packet	Pages	OCR pages	Sparse pages
08-19-26REG01	71	38	1
08-19-26REG02	72	39	0
09-15-26REG02	839	685	60
09-15-26REG03	146	116	9
09-15-26REG04	111	78	2

Hashes and extraction metadata identify the exact files reviewed; a hash is not proof of substantive authenticity. Applicant/resident calculations remain attributed to their originators. Independent calculations are limited to reported numeric inputs and do not amount to a licensed survey. Native GIS work, underlying title verification and complete litigation records are still needed to resolve named issues.

Correction discipline: a later executed affidavit, revised geometry, historical ordinance, corrected proposal or judicial ruling can change an entry. Preserve the old entry, add the new source/date, identify which dependency changes and recompute only affected findings. Never silently change a disputed question into a fact. An automated packet reviewer must retain these distinctions and requires validation before public use.

Source register

[1] Florida Legislature. CS CS CS SB 686 enrolled text. 2026.

Primary law; §§1–4 and numbered bill lines. Deletions must be excluded when reading the operative law.

<https://www.flsenate.gov/Session/Bill/2026/686/BillText/er/HTML>

[2] Laws of Florida. Chapter 2026 34. 2026.

Primary law; enacted session law.

<https://laws.flrules.org/2026/34>

[3] Florida Legislature. Florida Statutes section 163.3162. 2026.

Primary law; subsection (4), temporary certification procedure. Read the effective version and reversion note.

<https://www.flsenate.gov/Laws/Statutes/2026/163.3162>

[4] Florida Legislature. Florida Statutes section 163.3164. 2026.

Primary law; subsection (4), enclave definition; (57), urban service area; other definition pinpoints in the text.

<https://www.flsenate.gov/Laws/Statutes/2026/163.3164>

[5] Florida Legislature. Florida Statutes section 193.461. 2026.

Primary law; agricultural classification and bona fide commercial use, particularly (3)(b).

<https://www.flsenate.gov/Laws/Statutes/2026/193.461>

[6] Florida Legislature. Florida Statutes section 380.04. 2026.

Primary law; development definition and exceptions.

<https://www.flsenate.gov/Laws/Statutes/2026/380.04>

[7] Florida Legislature. Florida Statutes section 163.3177. 2026.

Primary law; capital improvements element in (3), future land use element in (6)(a).

<https://www.flsenate.gov/Laws/Statutes/2026/163.3177>

[8] Florida Legislature. Florida Statutes section 163.3180. 2026.

Primary law; concurrency.

<https://www.flsenate.gov/Laws/Statutes/2026/163.3180>

[9] Florida Legislature. Florida Statutes section 186.901. 2026.

Primary law; official population estimates.

<https://www.flsenate.gov/Laws/Statutes/2026/186.901>

[10] Florida Office of Economic and Demographic Research. Florida Population Estimates by County and Municipality April 1 2025. October 15, 2025.

Official data; St. Johns County row, PDF pp.10 and 13. Latest estimate linked on the reviewed EDR data page.

https://edr.state.fl.us/Content/population-demographics/data/2025_Pop_Estimates.pdf

[11] Florida Senate Rules Committee professional staff. Bill Analysis and Fiscal Impact Statement CS CS CS SB 686. February 25, 2026.

Official staff explanation, not controlling law or a statement of sponsor or Senate intent. Discussion pp.5–8.

<https://www.flsenate.gov/Session/Bill/2026/686/Analyses/2026s00686.rc.PDF>

[12] Florida Senate. SB 686 bill history and documents. 2026.

Official legislative history; Governor approval, chapter, votes and effective date.

<https://www.flsenate.gov/Session/Bill/2026/686>

[13] St. Johns County. Development Review Manual Section 42 Agricultural Enclaves. Created July 1, 2026.

Local implementation guidance, five-page PDF. Relevant sections 42.02–42.05.

<https://www.sjcfl.us/wp-content/uploads/2026/06/Section-42.0.Agricultural-Enclaves.07.01.2026.pdf>

[14] St. Johns County. Comprehensive Plan Land Use Element 2025 posted document. Accessed September 30, 2026.

Local plan text. Policies A.1.2.7, A.1.2.9 and A.1.11.1(m)(8)(ss). Not independently certified as the January 1, 2025 historical version.

<https://www.sjcfl.us/wp-content/uploads/2026/06/A-Land-Use-2025.pdf>

[15] St. Johns County. Comprehensive Plan Land Use Element 2050 posted document. Accessed September 30, 2026.

Local plan text. Includes Durbin Creek urban service provisions; not a substitute for the relevant historical adoption record.

<https://www.sjcfl.us/wp-content/uploads/2026/06/A-Land-Use-2050.pdf>

[16] St. Johns County. Comprehensive Plan Capital Improvement Element 2025 posted document. Accessed September 30, 2026.

Local plan text; schedules and policies must be matched to the relevant adopted version.

<https://www.sjcfl.us/wp-content/uploads/2026/06/H-Capital-Improvement-2025.pdf>

[17] St. Johns County. Comprehensive Plan Capital Improvements Element 2050 posted document. Accessed September 30, 2026.

Local plan text; publication date alone does not establish historical applicability.

<https://www.sjcfl.us/wp-content/uploads/2026/06/I-Capital-Improvements-2050.pdf>

[24] J. Brooks Terry for Jacksonville Daily Record. St Johns County reverses decision on agricultural enclave certifications. September 28, 2026.

Secondary procedural reporting; votes and identification of the urban service dispute.

<https://www.jaxdailyrecord.com/news/2026/sep/28/st-johns-county-reverses-decision-on-agricultural-enclave-certifications/>

[25] J. Brooks Terry for Jacksonville Daily Record. Heritage Development seeks to block St Johns County from reconsidering enclave certifications. September 24, 2026.

Secondary reporting of a petition and procedural claims; no court holding is inferred.

<https://www.jaxdailyrecord.com/news/2026/sep/24/heritage-development-seeks-to-block-st-johns-county-from-reconsidering-enclave-certifications/>

[52] Florida Legislature. Florida Statutes section 373.4595. 2026.

Primary law; water protection plan referenced by enclave acreage exception, especially (4)(c).

<https://www.flsenate.gov/Laws/Statutes/2026/373.4595>

[53] St. Johns County Clerk of Court. Board records agenda and minutes archive. Accessed September 30 2026.

Official archive; linked item backups and distinction between agendas and approved minutes.

<https://stjohnsclerk.com/board-records/agendas/>

[54] St. Johns County. North Palm Valley Road September 15 agenda packet. September 15 2026.

839 PDF pages. Staff pp.3 and 7–12; plats and affidavits pp.20–304; objector submissions pp.679–715 and 766–837.

<https://stjohnsclerk.com/minrec/agendas/2026/091526BCC/09-15-26REG02.pdf>

[55] St. Johns County. Heritage East August 19 special agenda packet. August 19 2026.

71 PDF pages. Staff findings pp.3–12; c 2 and paragraph h distinction p.6.

<https://stjohnsclerk.com/minrec/agendas/2026/081926BCCSpecial/08-19-26REG01.pdf>

[56] St. Johns County. Heritage West August 19 special agenda packet. August 19 2026.

72 PDF pages. Staff findings pp.3–12; c 1 c and urban service analysis pp.9–11.

<https://stjohnsclerk.com/minrec/agendas/2026/081926BCCSpecial/08-19-26REG02.pdf>

[57] St. Johns County. Sandy Creek September 15 agenda packet. September 15 2026.

146 PDF pages. Preliminary deficiencies pp.7–9; other criteria pp.10–13; later forestry exhibits pp.125–144.

<https://stjohnsclerk.com/minrec/agendas/2026/091526BCC/09-15-26REG03.pdf>

[58] St. Johns County. AFI September 15 agenda packet. September 15 2026.

111 PDF pages. Staff pp.3 and 6–12; ownership agricultural and boundary exhibits pp.35–84.

<https://stjohnsclerk.com/minrec/agendas/2026/091526BCC/09-15-26REG04.pdf>

[59] St. Johns County Clerk of Court. Approved August 19 special meeting minutes and exhibits. August 19 2026.

36 PDF pages; Heritage votes pp.2–4; North Palm continuance pp.4–6.

<https://stjohnsclerk.com/wp-content/uploads/2026/09/081926msbcc.pdf>

[60] St. Johns County Clerk of Court. Approved September 1 regular meeting minutes and exhibits. September 1 2026.

184 PDF pages; North Palm discussion and failed motions pp.8–10.

<https://stjohnsclerk.com/wp-content/uploads/2026/09/090126mrbcc.pdf>

[61] St. Johns County Clerk of Court. Draft September 15 regular minutes submitted for October 6 approval. October 6 2026 agenda attachment.

40 PDF pages. Not approved minutes at September 30 cutoff. North Palm denial and Sandy Creek withdrawal p.8; AFI approval pp.8–9.

<https://stjohnsclerk.com/minrec/agendas/2026/100626BCC/10-06-26CON24a.pdf>

[62] St. Johns County. Heritage East reconsideration special agenda packet. September 28 2026.

73 PDF pages; cover describes prior approval and scheduling. Agenda is not evidence of the eventual September 28 vote.

<https://stjohnsclerk.com/minrec/agendas/2026/092826BCCSpecial/09-28-26SPC01.pdf>

[63] St. Johns County. Heritage West reconsideration special agenda packet. September 28 2026.

74 PDF pages; prior approval and reconsideration context.

<https://stjohnsclerk.com/minrec/agendas/2026/092826BCCSpecial/09-28-26SPC02.pdf>

[64] St. Johns County. All 16 ENCERT portal records. Snapshot September 30 2026.

Administrative filing and status data. The index links individual records; withdrawn and replacement filings are distinct.

<https://webapp.sjcfl.us/CSubmittalWeb/AppPicklist?ApplType=ENCERT&View=Apps>

[65] St. Johns County. Infrastructure Element 2025 posted plan. Accessed September 30 2026.

Policies D.1.1.5 and D.4.1.2; PDF pp.1–2 and 28. Posted text is not a certified historical adoption record.

<https://www.sjcfl.us/wp-content/uploads/2026/06/D-Infrastructure-2025.pdf>

[66] St. Johns County. Infrastructure Element 2050 posted plan. Accessed September 30 2026.

Policies D.1.1.3–6, PDF p.3; D.4.1.2, PDF p.25. Numbering and substance differ from 2025 plan.

<https://www.sjcfl.us/wp-content/uploads/2026/06/D-Infrastructure-2050.pdf>

[67] Florida Second District Court of Appeal. Sheik Island Farm v Covington Farm opinion 2 D2025-0151. 2026 opinion; docket 2 D2025-0151.

Primary judicial opinion, PDF pp.14 and 16. Not an SB 686 decision; classification has different statutory roles. Downloaded cover contains placeholder ISSUE DATE.

https://flcourts-media.flcourts.gov/content/download/2485353/opinion/Opinion_2025-0151.pdf

[68] St. Johns County Clerk of Court. Ordinance 2021 87 Adler Creek comprehensive plan amendment. December 7 2021.

Adopted plan amendment, Exhibit C. Historical legal instrument; later amendments and project-boundary overlap require verification.

<https://stjohnsclerk.com/minrec/OrdinanceBooks/2021/ORD2021-87.pdf>

[69] St. Johns County. Public records request 2026004107. Accessed September 30 2026.

September 23 note: emailed links for ENCERT 10–13, updated 10,12,13 through that date; links expire January 11 2027. Public record does not expose the actual SharePoint links.

<https://webapp.sjcfl.us/CSubmittalWeb/Record.aspx?ApplType=PRR&ApplNum=2026004107>

[70] St. Johns County. Public records request 2026004108. Accessed September 30 2026.

September 23 note: emailed links for ENCERT 14–16; links expire January 11 2027. Public record does not expose the actual SharePoint links.

<https://webapp.sjcfl.us/CSubmittalWeb/Record.aspx?ApplType=PRR&ApplNum=2026004108>

[71] St. Johns County. Public records request 2026003347. Accessed September 30 2026.

August 10 note: emailed links to ENCERT 1–8. Public record does not expose the actual SharePoint links.

<https://webapp.sjcfl.us/CSubmittalWeb/Record.aspx?ApplType=PRR&ApplNum=2026003347>

[72] St. Johns County. ENCERT 2026 01 North Palm Valley Road. Accessed September 30 2026.

Dated local administrative notes and description; not a complete application packet or adjudication.

<https://webapp.sjcfl.us/CSubmittalWeb/Record.aspx?ApplType=ENCERT&ApplNum=2026000001>

[73] St. Johns County. ENCERT 2026 02 Osceola Lakes. Accessed September 30 2026.

Dated local administrative notes and description; not a complete application packet or adjudication.

<https://webapp.sjcfl.us/CSubmittalWeb/Record.aspx?ApplType=ENCERT&ApplNum=2026000002>

[74] St. Johns County. ENCERT 2026 03 Adler Creek original. Accessed September 30 2026.

Dated local administrative notes and description; not a complete application packet or adjudication.

<https://webapp.sjcfl.us/CSubmittalWeb/Record.aspx?ApplType=ENCERT&ApplNum=2026000003>

[75] St. Johns County. ENCERT 2026 04 Star IV original. Accessed September 30 2026.

Dated local administrative notes and description; not a complete application packet or adjudication.

<https://webapp.sjcfl.us/CSubmittalWeb/Record.aspx?ApplType=ENCERT&ApplNum=2026000004>

[76] St. Johns County. ENCERT 2026 05 Heritage East. Accessed September 30 2026.

Dated local administrative notes and description; not a complete application packet or adjudication.

<https://webapp.sjcfl.us/CSubmittalWeb/Record.aspx?ApplType=ENCERT&ApplNum=2026000005>

[77] St. Johns County. ENCERT 2026 06 Heritage West. Accessed September 30 2026.

Dated local administrative notes and description; not a complete application packet or adjudication.

<https://webapp.sjcfl.us/CSubmittalWeb/Record.aspx?ApplType=ENCERT&ApplNum=2026000006>

[78] St. Johns County. ENCERT 2026 07 Sandy Creek. Accessed September 30 2026.

Dated local administrative notes and description; not a complete application packet or adjudication.

<https://webapp.sjcfl.us/CSubmittalWeb/Record.aspx?ApplType=ENCERT&ApplNum=2026000007>

[79] St. Johns County. ENCERT 2026 08 AFI. Accessed September 30 2026.

Dated local administrative notes and description; not a complete application packet or adjudication.

<https://webapp.sjcfl.us/CSubmittalWeb/Record.aspx?ApplType=ENCERT&ApplNum=2026000008>

[80] St. Johns County. ENCERT 2026 09 Entrada. Accessed September 30 2026.

Dated local administrative notes and description; not a complete application packet or adjudication.

<https://webapp.sjcfl.us/CSubmittalWeb/Record.aspx?ApplType=ENCERT&ApplNum=2026000009>

[81] St. Johns County. ENCERT 2026 10 Adler Creek replacement. Accessed September 30 2026.

Dated local administrative notes and description; not a complete application packet or adjudication.

<https://webapp.sjcfl.us/CSubmittalWeb/Record.aspx?ApplType=ENCERT&ApplNum=2026000010>

[82] St. Johns County. ENCERT 2026 11 Carter Road. Accessed September 30 2026.

Dated local administrative notes and description; not a complete application packet or adjudication.

<https://webapp.sjcfl.us/CSubmitalWeb/Record.aspx?ApplType=ENCERT&ApplNum=2026000011>

[83] St. Johns County. ENCERT 2026 12 Star IV replacement. Accessed September 30 2026.

Dated local administrative notes and description; not a complete application packet or adjudication.

<https://webapp.sjcfl.us/CSubmitalWeb/Record.aspx?ApplType=ENCERT&ApplNum=2026000012>

[84] St. Johns County. ENCERT 2026 13 Pacetti Oaks. Accessed September 30 2026.

Dated local administrative notes and description; not a complete application packet or adjudication.

<https://webapp.sjcfl.us/CSubmitalWeb/Record.aspx?ApplType=ENCERT&ApplNum=2026000013>

[85] St. Johns County. ENCERT 2026 14 Osceola North. Accessed September 30 2026.

Dated local administrative notes and description; not a complete application packet or adjudication.

<https://webapp.sjcfl.us/CSubmitalWeb/Record.aspx?ApplType=ENCERT&ApplNum=2026000014>

[86] St. Johns County. ENCERT 2026 15 Osceola South. Accessed September 30 2026.

Dated local administrative notes and description; not a complete application packet or adjudication.

<https://webapp.sjcfl.us/CSubmitalWeb/Record.aspx?ApplType=ENCERT&ApplNum=2026000015>

[87] St. Johns County. ENCERT 2026 16 King. Accessed September 30 2026.

Dated local administrative notes and description; not a complete application packet or adjudication.

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