

1565

THE 1565 COALITION

SB 686 in St Johns County

Agricultural enclaves public finance and fair county choices

A research report and decision guide for residents commissioners and county staff

By Justin Tahilramani

The 1565 Coalition

September 30 2026 | Record review edition

This report explains the agricultural enclave law, tests the disputed local questions against its text, and evaluates a fair response to the separate Amendment 3 property-tax forecast. It distinguishes controlling law, official records, analytical conclusions and unresolved facts.

Contents

Start with the executive findings. Chapters 3 through 8 explain the law, Chapter 9 examines local applications, and Chapters 10 through 15 address county finances. The glossary and operative text support independent verification.

Executive findings.....	3
Author and Coalition perspective.....	5
1 Scope and research method.....	6
2 What SB 686 enacted.....	7
3 The eligibility framework.....	9
4 Boundaries roads water and omitted parcels.....	11
5 Utilities urban service areas and the CIE.....	13
6 Existing development agriculture and density.....	15
7 Procedure protection and remaining county authority.....	16
8 Official explanations and their limits.....	18
9 The St Johns County application record.....	19
10 Amendment 3 and the correct fiscal baseline.....	24
11 What the county is most likely to do.....	26
12 Revenue options and their legal boundaries.....	28
13 Our recommendations for the fairest response.....	31
14 A transparent budget bridge.....	33
15 Where growth and the fiscal proposal intersect.....	34
16 A decision guide for commissioners and staff.....	35
17 Public questions answered.....	36
18 Glossary of statutory and official terms.....	37
Appendix A Operative law and essential definitions.....	39
Appendix B The Coalition mission statement.....	42
Appendix C Standards for a citizen packet reviewer.....	43
References and source register.....	46

Executive findings

Florida Senate Bill 686 changes how qualifying agricultural land may obtain development approval. It does not enact the homestead exemption expansion responsible for the county revenue reductions now under discussion. That proposal is Amendment 3, originating in CS/HJR 1F of the 2026 special session. This report examines both because their practical effects meet in the county budget: new development can create infrastructure and service obligations while a separate tax change can reduce the revenue available to meet them. Their legal mechanisms and fiscal effects must nevertheless be measured separately. [1–4, 28–31]

The principal conclusion is that St. Johns County should apply SB 686 through an explicit, reproducible statutory test and prepare for Amendment 3 through a publicly reconciled budget plan. Neither opposition to growth nor support for property rights substitutes for evidence that an application meets every applicable statutory element. Neither a project hold nor a reserve balance is equivalent to a permanent annual revenue replacement.

Record review update. Among five applications with agenda packets located, four received favorable preliminary staff findings. AFI is the one approval remaining in the records checked at the cutoff. These counts do not establish how many of all 16 filings independently satisfy every statutory requirement. Chapter 9 gives the evidence, competing positions and unresolved questions. [53–64]

Findings that change the public discussion

The law is statewide in form and selective in operation. SB 686 became Chapter 2026-34, was approved April 20, 2026, and took effect July 1, 2026. Its amendments expire January 1, 2028, subject to the reversion language in section 3. St. Johns County is not named. The statute uses land characteristics, a historical date, acreage limits, adjacent uses and a county population ceiling. Martin County's official agenda includes an application under the same law. No verified statewide inventory was found that establishes St. Johns County's numerical predominance. [1–2, 12, 26]

An enclave need not be enclosed on all sides. There are alternative eligibility routes. The principal route uses at least 75 percent of perimeter; the route for properties no larger than 700 acres uses two separate 50 percent perimeter tests; the adopted rural study area route contains no numerical perimeter requirement in that particular alternative. All remain subject to the other applicable definition and certification conditions. [4, §163.3164(4)]

Roads and water do not automatically interrupt the perimeter calculation. The enacted definition expressly requires use of adjacent parcels across a right-of-way, body of water or canal along the subject perimeter. It does not provide a maximum crossing distance, projection method, rounding convention, or express permission for repeated jumps over ordinary intervening land. [1, lines 237–240; 4]

An urban service area is a defined planning concept. A utility service territory alone does not prove it. A county Development Area Boundary also requires examination against the state definition and supporting plan and infrastructure evidence. The state's definition recognizes both qualifying areas identified in a comprehensive plan and areas expressly identified there as urban service areas. The current definition appears at §163.3164(57). [4, 14–17]

There is no universal density of one, six or thirteen homes per acre in SB 686. Density depends on the applicable adjacent parcel or development and the statutory route. The 700, 1,280 and 4,480 figures are acreage limits, not residential density entitlements. Certification is also distinct from final construction approval. [1, §§1–2]

The best supported county revenue forecast is \$68.3 million in FY 2028 and \$136.1 million in FY 2029. The official state model reaches \$191.6 million annually in FY 2032. These are reductions against a modeled

baseline if Amendment 3 passes, not established SB 686 losses. The reviewed official sources do not substantiate \$180 million in the first affected year followed by \$450–500 million in the second. [29, PDF p.16, printed p.697]

The most likely initial responses are already visible. The county has announced capital project holds, reassessment of vacant and proposed positions, review of fees, contracts and replacement schedules, reserve preparation, and a municipal service benefit unit study. Specific library closures, park closures, fire assessments, gasoline tax increases or across-the-board fee percentages have not been established as adopted outcomes in the reviewed record. [30–32]

Our recommended approach protects broad public services and measures the combined burden. Begin with demonstrable efficiencies and discretionary expansion deferrals. Price individualized services transparently, with hardship protections where legally available. Examine transportation funding and other restricted revenues for eligible expenditures. Compare a lawful, calibrated millage adjustment against special assessments before shifting costs to flat household charges. Publish the effect on renters, modest-income homeowners, small businesses, rural residents and city residents as well as the average taxpayer. These are this report's recommendations, not a statement that the county has adopted them.

Author and Coalition perspective

Justin Tahilramani

Justin Tahilramani brings experience on both sides of public administration: government contracting and procurement, and the practical work of developing property and operating a local business. He is a U.S. Army veteran with experience in contracting and acquisitions. His public business biography identifies a bachelor's degree from Texas Tech University and a master's degree from the University of the Incarnate Word. His broader account of his professional experience includes more than a decade of real estate work involving acquisition, entitlement, subdivision and housing projects. The real estate history is author supplied; this report does not represent that every project or credential has been independently audited. [49; author supplied background]

His connection to St. Johns County includes public employment and local enterprise. A county procurement record associated with Resolution 2023-61 identifies him as Senior Procurement Coordinator in February 2023. His public biography also identifies him with The Outpost, a St. Johns County business. These are concrete local connections; this report makes no unsupported claim about how long he has lived in the county. [49–50, procurement notice and solicitation contact]

That combination is particularly relevant to consultation on SB 686 and county finances. Procurement experience informs questions about documented authority, scope, competition, price and contract performance. Development experience informs questions about entitlement, infrastructure commitments, carrying costs and implementation timelines. Local business experience informs questions about how fees and administrative delays affect employers, tenants and customers. These qualifications support practical policy analysis. They do not establish exclusive expertise or substitute for a court's judgment, a licensed boundary survey, an engineering capacity certification or a county budget certification.

Perspective and disclosure. This is an independent Coalition research report under Justin Tahilramani's byline. His property and business experience is both a source of insight and a relevant perspective for readers to understand. The Coalition's supplied mission poster identifies donations from The Outpost at Old Moultrie Road as sponsorship of the Coalition page and distinguishes the business from Coalition positions. This report does not infer a separate funding arrangement for this research or an undisclosed relationship with any enclave applicant. The publication is not a county publication. [51]

What The 1565 Coalition stands for

The 1565 Coalition represents a civic perspective centered on small-business owners, operators and supporters in St. Johns County. Its supplied mission statement focuses on how county rules, fees and review processes work when people try to open a business, hire someone or keep a tenant on schedule. The Coalition is independent of county government. Its stated discipline is to document process in concrete terms: the responsible public body, the date, the stage, the decision, and the resulting time and cost. [51]

For this report, that commitment means linking legal conclusions to the enacted words, distinguishing facts from disputed claims, and showing who ultimately pays for a budget choice. Supporting small businesses does not require transferring every cost to households. Protecting households does not require treating businesses as an unlimited replacement tax base. The fairness recommendations assess the distribution of both money and public services.

The Coalition's supplied communications guidance also emphasizes policy and process rather than targeting private residents or employees. This report therefore names public bodies, public officials where relevant to recorded actions, and applicant entities needed to identify proceedings. It does not turn residents' personal stories into evidence without authorization. [51]

1 Scope and research method

This is a research monograph and public decision guide, prepared to doctoral standards of source discipline, analytical transparency and explicit limitations. It is not represented as a university dissertation, an independently peer-reviewed legal opinion or evidence of a doctoral degree. The research cutoff is September 30, 2026. Events, applications, court orders and statutes can change after that date.

The principal questions are what SB 686 requires; what definitions it incorporates; how the perimeter, acreage, services and neighboring-use tests operate; what can be concluded about prominent St. Johns County applications; and which responses to the separate Amendment 3 revenue forecast are most plausible and most equitable. The unit of legal analysis is the enacted provision. The unit of fiscal analysis is the relevant taxing authority and recurring budget year.

Source hierarchy

The report gives first priority to the enacted law, current statutory text, the proposed constitutional amendment and judicial opinions. Official legislative analyses explain background but do not amend statutory language. County plans, review manuals and application records establish local implementation and recorded facts; they do not constitute statewide interpretations. News reporting is used sparingly to identify public votes, disputes and reported litigation where the complete primary proceeding was not obtained. Developer and objector advocacy is not adopted as legal authority.

References in square brackets identify the numbered source register. Subsections, policy numbers, PDF page numbers and bill line numbers provide pinpoint references where they matter. The bibliography identifies sources that are primary law, official explanation, local administrative records, news reporting or author supplied material. Financial calculations in this report are expressly identified as calculations, not additional county forecasts.

What the evidence does and does not establish

The reviewed materials include the enrolled bill, statutory cross-references, Senate staff analysis, the county's agricultural enclave manual, posted comprehensive plan elements, all 16 portal filing records, nine complete agenda packet PDFs covering five applications, hearing minutes, the state's tax impact model, and county fiscal communications. Chapter 9 distinguishes acquisition of complete packet PDFs from independent verification of every exhibit. The review did not obtain a complete certified evidentiary record for every enclave, all signed final orders, certified historical GIS layers, applicant surveys, full infrastructure capacity studies or the complete Heritage court docket. Accordingly, the report identifies the issues that decide a case without pretending to adjudicate facts absent from this record.

Targeted public searches of legislative, FloridaCommerce, Attorney General and county materials did not locate a separate statewide SB 686 survey manual, binding administrative boundary methodology or comprehensive state FAQ resolving the disputed geometries discussed here. This is a finding about the materials located, not proof that no unpublished advice, later guidance or additional record exists. No merits decision construing the new law was identified in the reviewed sources. Reported litigation means it would be inaccurate to say there are no cases at all. [25]

The fiscal discussion also has limits. A departmental fee schedule, restricted fund balances, contracts, debt covenants and property-level tax records are necessary to produce an implementable replacement budget. The published planning figures support a ranked response and sensitivity calculations; they do not support invented dollar yields for unadopted charges. The September 29 event was announced as an Amendment 3

town hall led by Joy Andrews with budget information from Wade Schroeder. This report does not claim a verbatim audit of that entire meeting. [33]

2 What SB 686 enacted

The bill and its temporary operation

The relevant measure is the 2026 CS/CS/CS for SB 686, Agricultural Enclaves, sponsored by Senator Stan McClain. The Senate's history records approval by the Governor on April 20, 2026 and Chapter 2026-34 on April 21. The effective date was July 1, 2026. Specifying year and enrolled version matters because bill numbers recur and earlier versions differ. [1–2, 12]

Section 1 replaces the former agricultural enclave comprehensive plan amendment procedure in §163.3162(4) with a certification and development-plan process. Section 2 revises the definition in §163.3164(4). Section 3 expires those amendments on January 1, 2028 and restores the June 30, 2026 text, preserving other independently enacted amendments to the extent specified. Section 4 supplies the effective date. [1]

The prior process contained good-faith negotiations, state plan review and a rebuttable urban-sprawl presumption. Those provisions should not be copied into the temporary certification process as if they remained its governing procedure. Conversely, the sunset should not be described as an express cancellation of every certification already issued. The act does not contain a complete transition code specifying every consequence for a pending application, approved certification or unfinished development plan at expiration. Those questions require analysis of the actual approval, applicable law and any later legislation. [1, §§1, 3]

Who can use it

The practical beneficiaries are owners and controlling entities of qualifying unincorporated agricultural parcels seeking development rights derived from adjacent properties or development. The definition is not limited to small farms, family farmers, distressed owners, affordable housing providers or St. Johns County residents. It contains no affordability set-aside, workforce housing requirement, local-residency preference or income test. Its ordinary development-plan path addresses single-family residential housing; a specified interstate-related route also allows commercial or industrial development. [1, §1(a), (e), (h); 4]

The longstanding purpose language in §163.3162 concerns agricultural lands and practices. Its separate restrictions on duplicate regulation of agricultural operations and references to agricultural best management practices are not a newly adopted technical manual for certifying housing enclaves. The certification provisions must be read on their own terms and with their actual cross-references. [3, subsections (1), (3), (4)]

Geographic reach

The subject property must be unincorporated, and its county must have a population no greater than 1.75 million using the most recent official estimate under §186.901. The latest official county estimate located on EDR's population page was April 1, 2025: St. Johns County 348,336, comfortably below the threshold. Future applications should use the then-current official estimate, not a projection or an unrelated Census figure. [4, (4)(f); 9–10]

The law names certain protected areas and refers to a water protection plan that limits use of the expanded acreage allowance in affected counties. It does not name St. Johns County as a beneficiary. The existence of Martin County's Kanner/96th Street application demonstrates actual use outside St. Johns County. A theory that a law was politically influenced by particular interests is a different proposition from a finding that its

enacted scope is geographically exclusive. The reviewed primary record does not justify that exclusivity claim.
[1, §1(i), §2(e); 26, 52]

3 The eligibility framework

Read §163.3164(4) as a set of baseline requirements plus alternative ways to satisfy paragraph (c). The alternatives within (c) do not eliminate ownership, agricultural history, services, acreage or population requirements. Section 163.3162(4)(a) separately requires an adjacent density comparator and prohibits using the perimeter of another certified enclave to establish the definition. [1, 3–4]

Baseline requirements

Requirement	Operative rule	Evidence needed
Historical setting	Unincorporated, undeveloped parcel or parcels, with the definition keyed to January 1, 2025	Historical legal descriptions, incorporation status and land condition
Ownership or control	A single person or entity owns or controls the subject parcels	Deeds and legally meaningful control instruments
Agricultural use	Continuous bona fide agricultural use under §193.461 for five years before the relevant application	Agricultural classification history plus evidence of actual continuous commercial use
Public services	Available services, scheduled CIE services, an alternative provider consistent with applicable concurrency, or an offered binding proportionate-share agreement	Capacity and timing evidence or a sufficiently specific proposed commitment
Area	Ordinarily no more than 1,280 acres; expanded 4,480-acre route has additional conditions	Surveyed area of the actual subject property and applicable statutory route
County population	No greater than 1.75 million under the most recent official §186.901 estimate	Official population estimate

Source: [4, §163.3164(4)(a)–(f)]. The table summarizes the text; it does not add mandatory forms prescribed by the state.

The January 1, 2025 introductory phrase and the rolling five-year agricultural-use language should both be addressed. The statute does not expressly explain every interaction between them. An application should document the historical snapshot and the five-year period tied to its filing rather than simply assuming that conduct after January 1, 2025 cures a missing historical condition. Acquisition after that date, changed parcel boundaries and changed neighboring entitlements likewise deserve an express temporal finding instead of an unstated assumption. [4]

Alternative perimeter and location routes

Route	Minimum showing under paragraph c	Important limit
c1a	At least 75% of subject perimeter surrounded by parcels with existing industrial, commercial or residential development	Existing development must be evidenced

Route	Minimum showing under paragraph c	Important limit
c1b	At least 75% of perimeter next to parcels designated for those uses on both zoning and future land use maps, with at least 50% of such parcel or parcels existing development of those kinds	The 50% is a separate development test, not another subject-perimeter test
c1c	At least 75% of perimeter formed by the specified combination of interstate highway and parcels within an urban service district, area or line, with the required future land use designations	The enacted subparagraph does not add a 50% existing-development requirement
c2	Subject area no more than 700 acres; at least 50% of perimeter adjacent to the specified future land use designations and at least 50% adjacent to parcels within an urban service district, area or line	Both 50% tests apply; the text does not expressly require the qualifying segments to coincide
c3	Within an established rural study area adopted in the comprehensive plan and intended for residential uses	No numerical perimeter threshold in this alternative; other eligibility requirements remain

Source: [4, §163.3164(4)(c)]. The discussion uses c1a and similar labels only as shorthand for statutory subparagraphs.

One cannot reject a c2 application simply because it fails 75 percent. One cannot approve a c1b application from future land use color alone while omitting zoning and the existing-development test. One cannot infer that any area casually described as rural is an adopted rural study area. Each route asks a different evidentiary question.

Acres is a separate gate

The ordinary limit is 1,280 acres. The expanded route permits up to 4,480 acres when at least 75 percent of the perimeter is surrounded by existing or authorized residential development producing at least 1,000 residents per square mile at buildout, subject to the affected-county exception linked to §373.4595(4)(c). A commercial neighboring use that counts for one paragraph does not thereby satisfy this residential buildout test. [4, (4)(e); 52]

One square mile is 640 acres. Thus 1,000 residents per square mile equals 1.5625 residents per acre. It does not equal 1.5625 homes per acre, and it is not a density cap for the enclave itself. Converting homes into residents requires a defensible occupancy assumption and a clearly identified geographic denominator. The statute does not supply a universal persons-per-household multiplier.

The 700-acre cap is attached specifically to c2. A 900-acre property cannot use c2 merely because it lies below 1,280 acres. Conversely, a property below 700 acres may still use another route if its facts meet that route. Area and perimeter must be computed for the same subject configuration unless a different treatment is expressly justified.

4 Boundaries roads water and omitted parcels

Measure length rather than sides or parcel counts

The statute speaks in percentages of perimeter. Counting neighboring owners, counting parcels or saying a property is bordered on three sides does not compute that percentage. A long, narrow tract can meet a percentage on fewer visibly distinct sides than a square. A corner contact normally has no measurable length; treating it as an entire qualifying boundary would require an explanation unsupported by the mere word adjacent. [4, (4)(c), (e)]

For an auditable calculation, define total subject perimeter P and the qualifying boundary length Q for each particular test. The percentage is $100 \times Q \div P$. Keep separate numerators for qualifying future land use, urban service location, existing development and the special residential buildout condition. The formula is this report's implementation recommendation, reflecting the ordinary meaning of perimeter; it is not a state-issued survey standard.

Illustration. A tract with 10,000 feet of perimeter and 7,600 feet meeting c1a reaches 76 percent. The same tract with 7,490 qualifying feet reaches 74.9 percent and does not reach an at-least-75-percent threshold merely because a presentation rounds it to 75. Publish the unrounded result, measurement precision and treatment of disputed segments.

For c2, suppose 5,300 of 10,000 feet qualify under the future land use test and 5,100 feet under the urban service test. The two ratios are 53 and 51 percent. Their overlap may be only 2,000 feet. The enacted text states two tests and does not expressly demand a common 5,000-foot overlap. That is a textual reading, not a judicial holding; show the overlap as well so the deciding body can evaluate any contrary argument transparently. [4, (4)(c)2]

Crossing a road canal or water body

The final sentence of the definition states that where a right-of-way, body of water or canal exists along a parcel's perimeter, the enclave's perimeter calculations must be based on the adjacent parcel or parcels across it. This directly answers the basic question about a road or river between the subject boundary and a potential qualifying neighbor: the intervening feature is not an automatic disqualifier. The verb is mandatory. [1, lines 237–240; 4]

The sentence answers less than some arguments assume. It does not specify a distance cap, dictate how to match a curved shoreline to opposite parcels, define the treatment of multiple channels or islands, or state that crossing an ordinary intervening tract is allowed. It concerns perimeter calculations. It does not expressly say that two separated pieces of the applicant's land become a single contiguous subject, or that a parcel recognized across water for perimeter purposes automatically supplies the development density comparator under §163.3162(4)(a) or (e).

Recommended method. Preserve the length of the subject boundary as the denominator and identify, segment by segment, the parcel across the intervening feature. Document the crossing geometry, the feature's legal and physical limits, and each opposite parcel's qualifying attributes. Do not replace the subject boundary length with the opposite parcel's entire perimeter. A shoreline with several possible opposite parcels should produce an explicit alternative calculation and a stated legal finding, not an unexplained GIS line.

An interstate raises an additional interpretive issue because c1c expressly includes an interstate as part of its combination, while the final sentence governs right-of-way crossings. A coherent reading should give effect to both provisions: identify what length is being counted as interstate under c1c, then identify which other

segments rely on parcels across a right-of-way. Count each physical segment once within a single ratio. The law does not expressly supply a comprehensive rule for resolving every overlap between these clauses. [4]

Boundary situation	Supported conclusion	Remaining question
Ordinary road along boundary	Use adjacent parcels across the right-of-way for perimeter calculations	Exact limits and opposite parcel assignment
Canal or river along boundary	Express crossing rule applies	Geometry, opposite shore and multiple channels
Nonqualifying ordinary tract before qualifying land	No express permission to skip it	Whether another independent route applies
Interstate frontage	Potentially relevant to c1c and the crossing provision	How the two clauses apply to the actual configuration
Road through the subject holding	Does not by itself answer whether the combined subject qualifies	Ownership of roadbed, subject geometry and internal versus external boundary
Separate subject tracts	Multiple parcels are expressly permitted	No express statewide contiguity or aggregation methodology

Can an owner omit related parcels

The statute permits a parcel or parcels owned or controlled by one person or entity. It does not expressly say that every property under common ownership must be included. It also does not define functionally combined property or enact a general anti-segmentation rule using that phrase. Consequently, a categorical rule that every commonly operated tract must always be aggregated would add words to the statute. A categorical claim that any boundary selection is unquestionably valid would also overstate what the text resolves. [4, (4)(a), (e)]

The correct inquiry is the legally supported subject configuration, its historical status, and whether it independently meets every criterion. Obtain all included legal descriptions, all excluded portions relevant to the calculation, ownership and control evidence, and any subdivision or boundary changes after January 1, 2025. An omitted parcel should not disappear from the perimeter analysis when its exclusion creates an intervening tract or an interior hole. Nor should its acreage be excluded for the cap but casually included to support the subject's services or agricultural-use proof.

Where adjoining subject parcels share an internal boundary, dissolving that boundary before measuring the combined external perimeter is a reasonable proposed methodology. It avoids counting a line internal to the application as surrounding development. But the statute does not expressly prescribe GIS dissolution, treatment of holes, disconnected components or every roadbed configuration. Show results under materially different plausible methods when the choice changes eligibility. This is especially important near 700, 1,280 or 4,480 acres.

The express anti-domino rule is narrower: an applicant may not use the perimeter of another parcel already certified by the local government as an agricultural enclave to meet the definition. It is not an express requirement to aggregate all ownership, and it should not be silently broadened into one. Its application to a later application requires checking certification dates and the specific neighboring boundary being relied upon. [3, (4)(a)]

A reproducible boundary exhibit

Each application should have one version-controlled exhibit linking its legal description to a map and a segment ledger. At minimum, record segment identifier, length, opposite parcel identifier, intervening road or water feature, relevant zoning and future land use, urban service basis, existing-development evidence, effective dates, and each statutory test for which the segment is counted. Publish totals and exclusions.

This exhibit is a recommended evidentiary practice, not a newly invented eligibility condition. The county's authority to require proof must be administered consistently with the statutory deadlines and the prohibition on more burdensome treatment than comparable applications. The county should apply a common method prospectively and explain any case-specific deviation. [3, (4)(b), (c), (f); 13]

5 Utilities urban service areas and the CIE

Three distinct questions

First, is the neighboring land within a qualifying urban service district, area or line where the chosen route requires it? Second, can the subject property's public services satisfy paragraph (d)? Third, does an actual development plan meet applicable capacity, concurrency and construction requirements? A positive answer to one does not automatically answer the other two. [3–4, 7–8]

A utility service territory identifies where a provider may serve. It does not, by itself, establish installed treatment capacity, funded expansion, road capacity, school accommodation or the comprehensive plan identification required by the urban service area definition. A utility availability letter is useful evidence, but its reservations, expiration, capacity assumptions and financing conditions matter.

The state definition

Section 163.3164(57) defines urban service area as areas identified in the comprehensive plan where public facilities and services, including central water and sewer capacity and roads, are already in place or are identified in the capital improvements element. It then includes any areas identified in the comprehensive plan as urban service areas regardless of local government limitation. The first sentence is not merely a requirement for a particular map label; the second expressly addresses areas that carry that identification. [4, (57)]

This yields two important cautions. An argument that only the exact phrase Urban Service Area can ever qualify overlooks the first sentence. An argument that any planned growth area automatically qualifies overlooks the infrastructure and plan predicates in that sentence. A conclusion about the county's Development Area Boundary must identify the relevant adopted plan provisions and the facilities or CIE entries that support it.

The statute separately uses urban service district, area and line. The reviewed definition section defines urban service area; it does not supply equally complete general definitions for all three phrases in the enclave provisions. Section 163.3162(4)(f)'s deemed-within rule specifically says urban service district. Treating district, area and line as identical in every context requires an articulated legal basis; the text does not authorize an unexplained substitution.

What St Johns County planning documents show

The posted 2025 land use element uses Development Areas to direct future growth and excludes specified rural and agricultural designations in Policy A.1.2.7. Policy A.1.2.9 calls for investigation of an Urban Service

Area designation. The same element separately identifies a Durbin Creek Urban Service Area in Policy A.1.11.1(m)(8)(ss). The posted 2050 element also contains Durbin Creek urban service language. These provisions demonstrate that the county's vocabulary is more specific than a single universal service-area label. [14, PDF pp.3, 51–52; 15, Durbin Creek provisions]

They do not, standing alone, decide whether particular Heritage-adjacent parcels satisfy the state definition. That determination needs the applicable adopted maps and text, the relevant historical date, and evidence of existing or CIE-identified facilities for the area being counted. A document uploaded in 2026 is not, merely by its filename, proof of what was legally effective on January 1, 2025. The posted 2025 and 2050 elements are useful research records; historical ordinance and map certification remains an outstanding case-record task. [14–17]

What a CIE is and is not

Section 163.3177(3) requires a capital improvements element addressing public facilities, costs, timing and financing, including a schedule covering at least five years. The schedule identifies projects as funded or unfunded and gives priority for funding. Annual review is required. Therefore, the bare presence of an unfunded entry cannot be dismissed as if the statute allowed only fully funded entries; equally, an entry does not by itself establish that capacity will be available when development needs it. [7, (3)]

The Capital Improvements Element is a comprehensive plan component. A capital improvement program, departmental wish list, utility master plan, grant application or transportation project list is not automatically the same document. If one is incorporated into the CIE, identify the legal incorporation and the actual project entry. The record should show facility type, service area, capacity or scope, anticipated date, provider and funding status. [7; 16–17]

Paragraph (d) of the enclave definition provides alternatives: public services available; public services scheduled in the CIE to be provided by the local government; an alternative infrastructure provider consistent with applicable concurrency; or the applicant's offer of a binding agreement for its proportionate share through payment, construction or land. Requiring a CIE entry in every application would erase the alternatives. An empty promise to address infrastructure later is not the same as demonstrating a specific offered binding agreement. [4, (4)(d)]

The offered-agreement alternative does not expressly redefine neighboring land as an urban service area. If an applicant invokes the service-agreement path for paragraph (d), the application must still establish any urban-service predicate independently required by c1c or c2. This distinction is central to an accurate analysis of the local dispute.

Concurrency and implementation

Section 163.3180 governs concurrency and distinguishes required statewide concurrency subjects from locally selected systems. Its application is facility specific. Certification does not manufacture water, wastewater or transportation capacity. Nor does the word concurrency establish that all listed services must follow the same approval mechanism. The development schedule should identify the applicable requirements, responsible providers and milestones rather than using concurrency as an unexplained label. [8]

For commissioners, the useful question is not simply whether a map shows utilities nearby. Ask what adopted planning provision and capacity evidence make the counted neighboring area qualify, and separately what legally adequate mechanism supplies the enclave's own services. Those findings should be independently visible in the order.

6 Existing development agriculture and density

The development cross reference

The Community Planning Act definition of development refers to §380.04. That section includes specified construction and material changes in land use, and contains exceptions, including certain agricultural activities and changes in ownership. It provides a starting point for interpretation. It does not automatically answer the more particular phrase existing industrial, commercial, or residential development in the enclave definition. [4, (14); 6]

A recorded plat, drainage improvement or seawall may be evidence relevant to a broader development inquiry. Whether it establishes existing residential development for the particular neighboring parcel, and how much of the relevant parcel or parcels is existing development for c1b, remain more specific questions. The decision should identify the actual improvement, use, date, approvals and geographic extent. It should not equate every physical alteration with completed residential development or insist without textual analysis that only occupied houses can ever count.

The phrase at least 50 percent of such parcel or parcels is existing development presents a measurement issue distinct from the outer perimeter. The text does not supply a detailed aggregation or measurement convention. Area-based measurement is a plausible working method, but the deciding body should explain the denominator and treatment of undeveloped portions, common areas, wetlands, roadways and separate parcels. Counting the number of tax parcels containing any improvement is a different method and should not be substituted without justification. [4, (4)(c)1.b]

Agricultural history

Section 193.461 describes bona fide agricultural purposes as good-faith commercial agricultural use and identifies factors relevant to classification, including use history, continuity, size, care and leases. The enclave law incorporates that framework and adds its own five-year continuity requirement. Agricultural zoning alone is not proof of actual agricultural activity; a single year's favorable tax classification alone does not establish every year in the required period. [5, (3)(b); 4, (4)(b)]

Tax records, leases, production or timber-management records and dated imagery can establish a coherent history. Different agricultural operations have different cycles, so absence of a crop on a particular aerial image does not automatically prove discontinued bona fide use. The finding should rest on the statutory agricultural standard and the evidence, not a visual stereotype of what a farm must look like.

Borrowing neighboring density

The certification provision asks whether one or more adjacent parcels or an adjacent development permits the same or a higher density than proposed. After approval, the ordinary plan pathway requires consistency with the land use requirements or future land use designations, including uses, density and intensity, of one or more adjacent parcels or an adjacent development. That language requires a legally supported comparator and a consistent unit of measurement. [3, (4)(a), (e)]

Identify the actual entitlement, whether it is a permitted maximum or a built condition, and whether the density is expressed per gross acre, net developable acre or another defined area. A mixture of neighboring commercial intensity and residential density cannot be casually translated into homes. The statute does not expressly prescribe averaging all neighbors, taking the highest number without its associated rules, or adding density entitlements from separate neighbors together.

Under paragraph (h), commercial or industrial development is available for an enclave certified under c1c that is adjacent to an interstate and meets the adjacent density or intensity condition. Merely having interstate frontage does not grant this exception to every property certified under c2 or c3. Nor does single-family language automatically encompass any desired multifamily form. [3, (4)(h)]

7 Procedure protection and remaining county authority

Trigger	Required action	Time stated in the law
Receipt of certification application	Provide written compliance report	Within 30 days
Provision of that report	Hold hearing to approve or deny	Within 30 days
Receipt of certification application	Approve or deny or face mandatory certification	Within 90 days
Denial	Written detailed findings and legal conclusions	Required by paragraph d
Rendition of denial decision	Applicant may petition circuit court for certiorari	Within 30 days
Receipt of development plans	Agree in writing to process and schedule	Within 30 business days
Agreed development-plan process	County cannot require a longer process or further quasi-judicial review or public hearing	Maximum required duration of 180 days

Source: [3, §163.3162(4)(b)–(g)]. Only the development-plan scheduling period expressly says business days. Receipt and rendition should be documented through the governing procedural rules, not guessed from a database entry.

The 90-day consequence is mandatory certification. The statute does not state an identical automatic construction-plan approval at day 180. It limits what process the county may require the owner to accept. Those are different legal mechanisms. A continuance, failed motion, request for information or announced intent to sue should not be assumed to stop the certification clock. The county's manual expressly says that its request for additional information does not toll or extend the statutory time. [3; 13, §42.03(B)]

Certification displaces conflicting local comprehensive plan, future land use and zoning treatment for the qualifying development described by the statute. It does not say that every safety, building, drainage, infrastructure or environmental requirement disappears. The county may not make enclave rules more burdensome than rules for comparable uses or densities. That comparator requirement matters both for conditions and for fees. [3, (4)(e)–(f)]

The statute expressly preserves existing protections for the Wekiva Study Area, Everglades Protection Area, listed areas of critical state concern, portions encumbered by recorded conservation easements and identified military installations or ranges. It encourages feasible wildlife-corridor measures such as clustering, retained open space and crossings. Encouragement is not the same as an unconditional mandatory new condition. Recorded easement protections also should not be mistaken for a blanket exclusion of all protected acreage from every area calculation; the text preserves protections but does not provide that universal arithmetic rule. [3, (4)(e), (i)]

Denial and judicial review

A denial must connect actual findings to each failed statutory element. Public concern can identify a relevant factual issue, but opposition by itself is not a finding that an acreage or perimeter criterion failed. Conversely, a professional's conclusion is not a substitute for its factual foundation. The statute does not prescribe a flawless-application standard or repeat the former urban-sprawl clear-and-convincing rebuttal standard for this new certification determination. [1, §1; 3, (4)(d)]

The Florida Supreme Court's Dusseau decision explains the familiar first-tier certiorari inquiries into procedural due process, essential requirements of law and competent substantial evidence; the reviewing court does not simply reweigh competing evidence. That is background judicial doctrine, not an SB 686 merits decision or an automatic importation of a special-exception burden into every enclave dispute. [27]

SB 686 expressly addresses an applicant's review of a denial. It does not provide a complete express reconsideration procedure for approvals, define all third-party standing, or resolve every finality and jurisdiction issue. The absence of a reconsideration clause is relevant but not, by itself, a fully researched holding that reconsideration is always forbidden or always authorized. That question should be addressed through the actual order, applicable procedural law and court rulings in the specific matter. [3; 25]

8 Official explanations and their limits

The Senate Rules analysis dated February 25, 2026 is useful for history and an overview of the contemplated changes. It expressly disclaims being a statement of sponsor intent or the Senate's official position. Even an official staff summary must be checked against the enacted bill. [11]

One consequential discrepancy is its discussion of the interstate and urban-service perimeter route, which describes a 50 percent existing-development condition not present in enacted c1c. The enacted c1b has a 50 percent condition, but it must not migrate into c1c through a summary. Similarly, a simplified description of the interstate commercial and industrial exception must retain the final law's express c1c certification prerequisite. [11, pp.6–7; 1, lines 107–113, 197–201]

The analysis's fiscal, technical and constitutional issue entries cannot establish that every county will have no infrastructure costs or that no constitutional challenge could succeed. They report the staff analysis's findings at that legislative stage. A county-specific lifecycle cost estimate is a separate task. [11, p.8]

County review manual

The county issued Development Review Manual Section 42, created July 1, 2026. It provides an application pathway, ownership and legal description requirements, a narrative showing statutory compliance, a fee requirement and the review timetable. Its no-tolling statement is particularly useful for administration. It is local implementation guidance, not a statewide regulation defining every disputed word. [13]

Several drafting differences warrant correction or clarification. The manual's separate lettered presentation of the 75 percent and 700-acre/rural-study alternatives can obscure the statute's alternative structure. It refers to comprehensive plan designation in its c1b counterpart although the enacted subparagraph specifies zoning and future land use maps. It addresses wildlife encouragement to the applicant while the statute addresses the local government. It paraphrases the appeal trigger as the date of the denial decision, whereas the statute uses the date the local government renders its decision. [13, §§42.02–42.04; 1]

These observations do not establish that any particular application was unlawfully decided. They identify where a reader relying only on the manual could misunderstand the governing text. The county should publish a corrected crosswalk and use the statute's exact hierarchy, triggers and terminology. Application instructions should explain the evidence required without adding substantive eligibility barriers or implying that an information request resets a statutory deadline.

9 The St Johns County application record

What can actually be counted

Official staff findings. Four of the five distinct applications for which complete agenda packet PDFs were located received favorable preliminary staff evaluations: North Palm Valley Road, Heritage East, Heritage West and AFI. Sandy Creek received an unfavorable preliminary evaluation on common ownership or control and agricultural-use evidence. This is a count of staff evaluations, not an independent finding that four applications conclusively satisfy the law. [54–58]

Administrative outcomes. The 16 portal filing records reconcile to one approval remaining in the records checked, three denials, five withdrawals and seven unresolved later filings as of September 30. The approval is AFI. The denials are North Palm Valley Road and the two Heritage applications, whose earlier approvals were reconsidered. September 15 draft minutes document AFI approval, North Palm denial and Sandy Creek withdrawal; those minutes were submitted for October 6 approval and must not be described as approved minutes at this cutoff. The September 28 Heritage dispositions remain supported here by contemporary procedural reporting and portal notes, not reviewed signed final orders. [18, 24, 61, 64]

Independent statutory compliance. The evidence does not support a single final number of applications that indisputably meet every requirement. Five packet-backed cases can be evaluated in detail, but material legal and factual disagreements remain; eleven other filing records do not have a complete evidentiary packet in this review. Unknown is not failure. Withdrawal is not a merits adjudication. Approval is an official decision, not a substitute for examining its evidence. A statement that only one application actually qualified would therefore go beyond this record.

The denominator is 16 filings, not 16 unrelated projects. Original and replacement applications are separate administrative records, but several concern related land. Acreage and boundary changes mean their evidence cannot simply be copied from one filing to another.

Record and project	Recorded status at cutoff	Evidence position in this review
01 North Palm Valley Road BR4700	Denied September 15	Favorable staff evaluation; material boundary and development disputes
02 Osceola Lakes	Withdrawn August 11	Complete merits record not obtained
03 Adler Creek original	Withdrawn August 10	Later related filing 10; complete merits record not obtained
04 Star IV original	Withdrawn August 7	Later related filing 12; complete merits record not obtained
05 Heritage East	August 19 approval reversed September 28	Staff found c2 satisfied; urban service basis contested
06 Heritage West	August 19 approval reversed September 28	Staff found c1c satisfied; urban service basis contested
07 Sandy Creek	Withdrawn September 15	Preliminary staff deficiencies; later forestry exhibits require reconciliation
08 AFI	Approved September 15 by 3 to 2	Favorable staff evaluation; applicant accepted 1.08 units per gross acre
09 Entrada	Withdrawn September 16	Complete merits record not obtained

Record and project	Recorded status at cutoff	Evidence position in this review
10 Adler Creek replacement	Unresolved filing September 1	594.42 acres in portal; complete merits record not obtained
11 Carter Road	Unresolved filing September 1	200.75 acres in portal; complete merits record not obtained
12 Star IV replacement	Unresolved filing September 1	70.83 acres in portal; complete merits record not obtained
13 Pacetti Oaks	Unresolved filing September 1	40.5 acres in portal; complete merits record not obtained
14 Osceola North	Unresolved filing September 14	103 acres in portal; complete merits record not obtained
15 Osceola South	Unresolved filing September 14	Acreage not established from reviewed portal description
16 King	Unresolved filing September 21	36.626 acres in portal; complete merits record not obtained

Sources: portal snapshot [64], packet reports [54–58], minutes [59–61], and limited September 28 procedural reporting [24]. No withdrawal or unresolved filing is assigned a statutory failure from this table alone.

Record acquisition and its limits

The Clerk archive supplied nine complete agenda packet PDFs covering five distinct applications: three North Palm hearing versions, two Heritage East versions, two Heritage West versions, Sandy Creek and AFI. The September 15 North Palm packet alone contains 839 PDF pages. Approved August 19 special-meeting minutes, approved September 1 regular minutes, and draft September 15 minutes supply the principal decision chronology. September 28 packets establish what was placed before the reconsideration hearing; an agenda packet alone does not establish its eventual vote. [53–63]

Review focused on statutory evaluations, application narratives, ownership and agricultural exhibits, boundary calculations, selected plats and maps, and competing hearing submissions. Scanned portions required optical character recognition. OCR is a retrieval aid, not a substitute for the original image where a number, signature, map label or legal description matters. The review is not a licensed resurvey, parcel-by-parcel title examination or certified verbatim hearing transcript. Packet pagination below means the PDF viewer page, not the page number printed inside an exhibit.

North Palm Valley Road and BR4700

Official finding and action. Staff found apparent compliance, including 84.53 percent qualifying mapped perimeter and 50.72 percent existing-development perimeter. Staff also found the expanded acreage exception satisfied. The September 15 draft minutes record denial, 3 to 2, and direction to prepare written findings. These are distinct facts; the vote does not retrospectively erase staff's reasoning. [54, pp.3, 9–12; 61, p.8]

Strongest applicant showing. The packet includes sworn ownership and agricultural-use assertions, a Property Appraiser letter, forestry materials, a legal-description sketch, recorded subdivision plats, an affidavit tying the southern and eastern boundaries to those plats, public-service offers and an expanded-acreage density exhibit. The applicant's plat argument invokes the definition of development in §380.04, which

includes certain divisions of land. The actual plats and adopted development instruments are relevant evidence; counsel's legal conclusion remains an argument. [54, pp.20–29, 126–157, 265–304; 6]

Strongest objection. The submitted record challenges whether particular conservation or vacant neighboring parcels constitute existing residential development; whether the agricultural history describes the same land as the certification boundary; whether included improvements are consistent with the subject being undeveloped; whether omitted acreage changes the cap or perimeter; and whether the expanded-acreage residential buildout test has actually been established. Citizen exhibits include competing measurements and identify their GIS work as distinct from a boundary survey. Those assertions warrant checking against source deeds, plats and geometry, not automatic adoption because they appear in an official packet. [54, pp.679–715, 766–783, 834–837]

Our assessment. This remains a disputed merits case. The statute incorporates a broad development definition, giving the plat argument a real textual basis. But that does not automatically establish that every conservation tract within a larger subdivision is existing residential development for each specific enclave test. Conversely, a Property Appraiser label such as vacant does not alone settle the statutory land-use question. A defensible decision must identify the actual neighboring tract, its legal relationship to the larger development and the applicable statutory test.

The 50 percent requirement in c1b is expressed as a condition concerning the surrounding parcel or parcels, whereas staff reports a percentage of the subject perimeter. The record needs an explicit explanation of the measurement and denominator used to satisfy that clause. The ordinary 75 percent mapped-neighbor test, the c1b existing-development condition and paragraph (e)'s residential buildout test must not be treated as interchangeable. [4; 54, pp.10–12]

Sensitivity calculation. The applicant's expanded-acreage exhibit identifies a 58,166.76-foot total perimeter, 49,101.27 feet of qualifying residential surroundings, and east, south and west buildout densities of 1,760, 1,811 and 1,523 residents per square mile. Its 49,101.27 divided by 58,166.76 is approximately 84.41 percent, whereas staff reports 84.53 percent. The difference calls for reconciliation; it does not by itself move either result below 75 percent. Using staff's separate 50.72 percent figure with the applicant's total perimeter gives an illustrative margin of about 419 feet above half the perimeter. This is a sensitivity calculation using two reported inputs, not an independently verified boundary or a ruling that perimeter is the legally correct denominator for c1b's second condition. [54, pp.10, 12, 300–304]

The staff density table also distinguishes the applicant's one unit per gross acre proposal from a six-unit neighboring net-acre comparator. Multiplying six by all gross acres does not establish an approved home count. Neither the staff table's maximum-potential figure nor advocacy about a much larger project replaces the submitted proposal and governing density instrument. [54, p.7]

Heritage East and Heritage West

The routes differ. Heritage East covers 615.41 acres. Staff expressly found c2 satisfied and stated that East did not satisfy c1c. Accordingly, staff concluded that the commercial and industrial treatment in §163.3162(4)(h) did not apply to East. Heritage West covers 550.78 acres; staff found c1c satisfied, using an 80.61 percent combination of interstate and qualifying mapped parcels. Treating the two applications as legally identical obscures an important difference. [55, pp.5–11; 56, pp.5–11]

Strongest applicant showing. Staff verified single ownership as of the statutory date and agricultural classification from 2015 through 2025. It found that the Development Area Boundary, read with Objective A.1.2 and the Capital Improvements Element, satisfied the functional state urban service area definition. For East, GIS staff reported approximately 78.37 percent of surrounding parcels within that boundary and concluded both c2 perimeter tests were satisfied. For West, staff used the interstate combination described

above. Staff acknowledged that adequate public services were not presently available, but found the applicants' offers to provide or fund improvements sufficient under paragraph (d). [55–56, pp.7–11]

Calculation check. West's displayed perimeter map lists 11,167.66 feet of interstate, 4,433.75 feet of Mixed Use, 10,291.66 feet of Residential B and 6,239.25 feet of Rural or Silviculture frontage. If those four displayed categories form the entire non-overlapping perimeter, the first three total 25,893.07 of 32,132.32 feet, approximately 80.58 percent. That does not exactly reproduce staff's 80.61 percent. Both exceed 75 percent on these inputs; the discrepancy calls for reconciliation, not automatic rejection. It does not resolve whether the counted parcels satisfy the urban service requirement. [56, p.10; our calculation from displayed map lengths]

Strongest contrary position. The central issue is whether the particular neighboring area actually satisfies the state's definition, with an identifiable comprehensive-plan and infrastructure basis. A generalized policy of directing future growth into a development boundary may not, without the necessary evidence, establish the statutory urban service condition for the counted segments. Reported September 28 objections focused on that issue. They should be evaluated against the adopted plan and CIE, not accepted merely because the area lacks the exact local label urban service area. The first sentence of the state definition is functional; its second sentence separately includes express urban service designations. [4, (57); 14–17; 24]

Our assessment. The favorable staff reports supply an articulated legal and planning rationale, but the cited text and service evidence must be tied to the actual neighbors and relevant date. The merits are therefore disputed, not conclusively resolved by either the staff recommendation or the later reversal. An offered agreement addressing the subject development's services under paragraph (d) cannot silently replace the separate urban service showing under c2 or c1c. [4; 55–56]

The August 19 approved minutes record approvals, each 3 to 2. The September 28 agenda covers confirm that reconsideration followed a September 15 scheduling motion. Contemporary reporting records reversals to denials. The legality of reconsideration is a separate procedural issue from the land's eligibility; the reported petition for prohibition is not itself a court order. Signed final orders and the operative court docket remain necessary before stating a litigation outcome or an appeal deadline for either case. [59, pp.2–4; 62–63, p.1; 24–25]

AFI

Official finding and action. AFI's approximately 310-acre application received a favorable staff evaluation. Staff reported 78.6 percent surrounding existing industrial, commercial or residential development, after excluding churches and an agricultural storage parcel counted differently by the applicant. The applicant's calculation was 86.2 percent. September 15 draft minutes record acceptance of 1.08 units per gross acre and approval, 3 to 2. [58, pp.6–12; 61, pp.8–9]

Supporting evidence. The packet contains a sworn ownership affidavit, recorded deed, agricultural-use affidavit and 2018 timber management plan. The plan identifies both previously managed and unmanaged areas and describes their proposed inclusion in timber management. That supports a commercial forestry explanation, but a plan's proposed work is not by itself proof that every activity occurred throughout the relevant period. Staff also relied on records and aerial review. The existing-development affidavit and map identify the perimeter segments and explain road crossings. [58, pp.35–60, 67–77]

Issues requiring care. The staff narrative on PDF page 9 evaluates c1a, while its finding on page 11 cites c1b and repeatedly transposes the statute number as 163.3146. These are apparent citation inconsistencies. They should be corrected or explained; they do not independently prove substantive noncompliance if the underlying c1a facts are established. A reviewer must not invent an additional c1b requirement simply because of that citation. Conversely, the accepted 78.6 percent requires verification of the counted neighbors and dates; the larger applicant percentage cannot substitute for staff's exclusions.

Our assessment. AFI has the strongest combination in this reviewed set of a favorable staff record and an approval still standing. That is a comparative assessment, not a finding of error-free or judicially confirmed compliance. Its development density and ultimate unit count must remain linked to the accepted gross-acre limitation and subsequent lawful plans. Certification did not approve a final subdivision plan. [58; 61]

Sandy Creek

Preliminary deficiencies. Staff did not find adequate proof of single ownership or control of the two subject parcels or five years of bona fide agricultural use. The parcels were held by Sandy Creek Preservation Corporation and Sandy Creek Investment Corporation. Common officers alone did not, in staff's evaluation, establish the required control. Lack of agricultural tax classification was relevant to the evidentiary review but was not treated as an automatic statutory disqualifier. [57, pp.5, 7–9]

Other findings. Staff found the c2 tests satisfied at 58.5 percent, accepted the public-service agreement route, and found the ordinary acreage and county-population limits satisfied. Thus the unfavorable recommendation was not a finding that every criterion failed. The packet also discusses a recorded conservation easement. Certification cannot extinguish protections preserved by §163.3162(4)(i). [57, pp.9–13; 3]

Later evidence and strongest applicant case. Staff's letter acknowledges August 28 material not fully reviewed before the letter was completed. The packet contains a commercial-timber chronology, a claimed 2020 hay-production arrangement, and a forest management plan describing a long timber rotation. The plan recommends management for commercial timber and separately identifies swamp acreage unsuitable for intensive forestry. These materials require substantive evaluation; commercial forestry does not necessarily produce annual harvests. Equally, an applicant's description of evidence as conclusive does not make it so. [57, pp.9, 125–144]

Our assessment. The reviewed preliminary record identifies proof deficiencies and potentially substantive agricultural and control questions. It does not establish an incurable failure. The September 15 withdrawal means no final merits determination is supplied by that hearing. A complete assessment would reconcile the later material, exact subject geometry, actual use during the required period, corporate control and the conservation instrument. [57; 61, p.8]

What the remaining filings can and cannot establish

Portal entries confirm the remaining applications and their recorded disposition or continuing status. They do not supply the missing deeds, surveys, agricultural records, infrastructure commitments or final findings. No percentage of statutory compliance is assigned to those filings. Later Adler Creek, Star IV and Osceola filings must be reviewed on their own legal descriptions; a smaller area may alter both the applicable route and the surrounding perimeter. No universal aggregation rule is inferred, and no boundary selection is presumed valid without analysis. [4; 64]

Martin County's Kanner and 96th Street agenda remains an example of administration outside St. Johns County. Its staff recommendation is not a binding interpretation here or proof of its final board outcome. [26]

10 Amendment 3 and the correct fiscal baseline

The separate proposal

Amendment 3, derived from CS/HJR 1F, is scheduled for the November 3, 2026 ballot. It is a proposal at this report's cutoff, requiring at least 60 percent voter approval. SB 686 is already effective. Describing either measure merely as something that might pass obscures that difference. [12, 28, 30]

For qualifying existing Florida permanent residents, the proposal increases the non-school homestead exemption to \$150,000 for 2027 and \$250,000 for 2028, with inflation adjustment beginning in 2029. People who had not maintained permanent residence in Florida by December 31, 2026 initially receive the smaller \$50,000 non-school exemption, indexed beginning in 2028, with the larger exemption beginning in their fifth exemption year. Calling that four initial smaller-exemption years is more precise than assuming a separate five-full-years waiting period. School district exemption provisions remain distinct. [28, proposed Art. VII, §6; 29, pp.1–2]

The proposal reduces the assessment-growth cap for covered non-homestead property from ten to five percent. An assessment cap is not a cap on the tax bill, rent or sale price. Changes of ownership, applicable reassessment rules, exemptions and millage must be considered separately. The proposed homestead exemption expressly excludes assessments for special benefits. [28, proposed Art. VII, §§4, 6]

The proposal lists permitted uses of county and municipal ad valorem revenue. Its final category includes governmental operations and expenditures approved by specified county officers or governing bodies, except expenditures prohibited by general law. A summary that treats only the earlier listed categories as available and declares libraries or parks categorically prohibited omits material text. [28, lines 407–433]

Official annual forecast

County fiscal year	County commission revenue reduction	Share of fixed 426 million dollar FY 2027 baseline
2027	\$0	0.0%
2028	\$68,265,055	16.0%
2029	\$136,081,441	31.9%
2030	\$152,492,701	35.8%
2031	\$171,151,761	40.2%
2032	\$191,611,200	45.0%

Source: EDR July 10, 2026 revenue impact results, St. Johns Board of County Commissioners row, PDF p.16, printed p.697. Percentages are this report's calculations using the county's rounded FY 2027 \$426 million property-tax allocation baseline. They are not shares of each future year's projected total budget. [29–30]

These are annual modeled reductions from a baseline without the amendment. The \$136.1 million second-year figure does not mean an additional \$136.1 million on top of the first year's \$68.3 million within that same year. The cumulative FY 2028–2032 reduction is \$719,602,158, an arithmetic total across five years. A cumulative loss must never be presented as one year's shortfall.

The state table separately estimates municipal and independent special district losses. In FY 2028, the listed figures are \$3,850,618 for independent special districts within the county, \$3,188,098 for St. Augustine, and \$700,517 for St. Augustine Beach. Those are separate taxing authorities. They cannot all be called the county

commission's budget deficit, though some residents will experience overlapping service and tax effects. [29, same table]

Model assumptions and fiscal timing

EDR uses the 2025 final property tax roll and millage data, the January 2026 ad valorem estimating conference and the December 2025 national economic conference, with additional demographic assumptions. It models assessment growth, exemptions, new construction and the transition of incoming residents into the larger exemption. This is an official scenario estimate, not a promise about collections or the county's future policy response. Actual revenue will also depend on valuations, exemptions, growth, adopted rates and later implementation. [29, pp.1–3]

The amendment's proposed January 1, 2027 effective date refers to the tax change; the county's first affected budget year in the published forecast is FY 2028. That timing provides preparation time but does not justify permanent commitments against revenue expected to disappear. Budget documents should identify the tax roll year, fiscal year and cash collection period rather than mixing them.

The county's FY 2027 budget page describes a \$1,939,752,566 tentative/final workbook total, including over \$482 million of capital carryforwards. That large total is not an unrestricted recurring operating fund. Transfers, grants, enterprise revenues, project balances and restricted revenues must be separated before evaluating capacity to replace property taxes. The webpage's final-budget heading and hearing description are not a substitute for a fund-by-fund appropriation audit. [32]

11 What the county is most likely to do

This forecast ranks responses by evidence of preparation and administrative feasibility. It assigns no invented numerical probability. Confirmed means a county source documents the measure or review; likely means an analytical prediction grounded in that record; possible means legally or operationally plausible but not established as the county's chosen action. A review is not an adopted increase.

Measure	Likelihood assessment	Evidence and practical consequence
Delay or phase discretionary capital expansion	Very high and already underway	Approximately \$100 million placed on hold; timing and scope can change
Leave vacancies unfilled and pause proposed positions	Very high and already under review	\$8.6 million across several staffing categories identified for reassessment
Increase selected user fees and create some new charges	High likelihood of proposals	County reviewing 1,137 fees and additional proposed fees; exact schedule not yet established
Renegotiate contracts and lengthen selected replacement cycles	High likelihood of continued review	Part of the published financial resiliency work
Use reserves as a transition	High likelihood of consideration	Financial resiliency reserves identified; recurring reliance is unsustainable
Establish or expand service benefit funding	Medium likelihood of proposals	County confirms an MSBU study, without a final assessed service or rate in reviewed sources
Reduce service hours programs or subsidies	Medium if recurring gap remains	Analytical consequence of a large operating gap; no verified branch closure list
Increase fuel taxes or adjust millage	Possible and consequential	Available authority subject to limits; not established here as adopted county choices
Pursue a county infrastructure sales surtax	Possible but slower	Requires statutory referendum and use compliance

Sources for confirmed preparation: [30–32]. Likelihood judgments and consequences are this report's analysis.

The cuts residents are most likely to notice

The earliest visible effects are likely to be delayed facilities and amenities, slower expansion of service capacity, longer equipment replacement cycles and fewer added staff. If vacancy controls affect already constrained services, residents and businesses may experience longer response and review times even without a formal program closure. The county should measure those service consequences, including the risk that delay shifts costs to applicants or residents.

If additional reductions are required, discretionary program subsidies, selected recreation programming, service hours and lower-priority expansions are plausible candidates. They are candidates, not a verified list

announced by Joy Andrews. The appropriate next publication is a service-by-service menu stating current performance, proposed change, annual net savings, affected users and reinstatement cost.

Public safety cannot be treated as financially unrelated to the discussion. The county's rounded allocation of property-tax dollars assigns 31 percent to the sheriff and 27 percent to fire rescue. Parks, recreation and libraries together are seven percent. Applied to the same \$426 million baseline, the latter is about \$29.82 million, well below the \$68.27 million first-year modeled loss. Even eliminating that entire allocation would not close that first gap, and doing so would impose substantial service harm. This calculation demonstrates scale; it is not a proposal to eliminate the services or proof that their entire budgets are funded by property tax. [30; calculations]

The fee hikes residents and businesses should expect to see proposed first

Recorded fee action and its limit. Draft September 15 minutes submitted for October 6 approval record adoption of Resolution 2026-307 establishing the FY 2027 fee schedule. That action does not establish that all 1,137 fees under review increased or that an Amendment 3 replacement-revenue plan was adopted. The adopted schedule and cost basis must be examined charge by charge before estimating the resulting burden or revenue. [61, p.4]

The published fee review makes individualized services the most plausible first category: reservations and rentals, optional programs, certain inspections or reviews, and other services with identifiable beneficiaries and measurable costs. The reviewed sources do not identify which of those individual charges will rise or by how much. A prediction of a specific new park, permit or library charge would exceed the evidence. [31]

Charges tied to solid waste, stormwater, utilities or fire protection can produce more substantial household bills, but their legal bases, cost studies, service boundaries and existing financing differ. A benefit-unit study is evidence that the county is examining a mechanism, not proof that a countywide fire assessment has been approved. The report's recommendation is to disclose the entire annual household burden before selecting one.

Avoid double counting the announced measures

The \$8.6 million staffing figure includes \$4 million associated with current vacancies, \$2 million in FY 2027 positions not recommended for funding and \$2.6 million in recommended but paused positions. A position already omitted from the adopted baseline is not a fresh saving available again in FY 2028. Similarly, a \$100 million project hold is not necessarily \$100 million of unrestricted cash or annual operating savings. [31]

The county identifies \$31.2 million for emergency response reserves and a separate \$30 million General Fund financial resiliency reserve. These are balances and designations, not recurring tax receipts. If the full \$30 million were legally available and used solely against a \$68,265,055 annual gap, it would cover about 44 percent of one year, or approximately 5.3 months at a uniform spending rate. That is a sensitivity calculation, not a recommendation to exhaust the reserve. [31; calculation]

12 Revenue options and their legal boundaries

Millage

Under current §200.065(5), the ordinary maximum is the rolled-back rate, with higher rates subject to voting rules. A higher rate up to 110 percent of that rate requires two-thirds of the governing body's membership; above 110 percent requires unanimity for a five-member board or referendum. For St. Johns County, those thresholds generally mean four and five commissioners, respectively. Aggregation provisions and constitutional or other statutory caps still matter. SB 4F is separate from SB 686 and Amendment 3 and must be included in the analysis. [34–35]

The rolled-back rate is calculated from the tax base; it is not simply last year's nominal millage. A reduced taxable base can therefore complicate claims that restoring revenue necessarily requires a specified percentage increase over the legal rolled-back rate. The county must publish the actual Department of Revenue calculations, rate caps and vote threshold for the proposed year. This report does not project a millage rate without that certified base. [34]

A property tax adjustment distributes burden through taxable value and exemptions, which may be more equitable than a flat charge, but it can concentrate additional burden on rental and business property and newer residents. It should be evaluated against household and small-business incidence, not treated as either automatically fair or categorically unavailable. Each additional 0.1 mill raises \$100,000 per \$1 billion of taxable value before collection adjustments. That formula is a sensitivity, not a current county revenue estimate.

Fuel taxes

The Department of Revenue's 2026 chart lists St. Johns County at zero ninth-cent motor fuel tax, six cents of the first local option tax and zero additional one-to-five-cent tax. The chart therefore indicates potential motor-fuel headroom of six cents under the relevant authorities, subject to lawful adoption. This does not mean every gallon of every fuel can be taxed six cents more; diesel is governed separately. [36–38]

Section 336.025(1)(b) authorizes up to five additional cents on motor fuel by majority-plus-one vote or referendum. Its use restrictions concern specified transportation expenditures supporting capital improvements, including qualifying road and bridge work; routine road maintenance cannot be funded from this additional five-cent source. Section 336.021 supplies the separate ninth-cent authority. County and municipal distribution rules, collection costs and any pledges affect net county proceeds. [37–38]

The five-cent law requires imposition before October 1 to take effect January 1 of the following year. As of this report's September 30 cutoff, a decision deferred until after the November election ordinarily misses the January 2027 start under that timetable; a timely 2027 levy could take effect January 2028. This is a planning constraint, not a recommendation to bypass notice or rush an ordinance. [37, (1)(b)1]

At six cents, every 100 million taxable motor-fuel gallons would produce \$6 million gross before allocation and collection adjustments. A driver buying 600 taxable gallons would pay \$36 more annually if the entire increase were passed through. Actual county gallons have not been verified here, so neither figure is a revenue forecast. Fuel taxes collect some revenue from visitors and through traffic but also burden rural commuters and tradespeople. They can help finance eligible road costs; they cannot directly become an unrestricted substitute for sheriff or library operations.

Special assessments and service benefit units

County authority under §125.01 includes service units and financing tools subject to their legal requirements. A municipal service benefit unit is an administrative financing mechanism, not proof that any chosen service

qualifies for a special assessment. Florida Supreme Court decisions require a special benefit to assessed property and fair, reasonable apportionment. [39–41]

Morris v. City of Cape Coral upheld a particular fire assessment methodology; it did not authorize every flat charge for every public service. *City of North Lauderdale v. SMM Properties* rejected the contested emergency medical services component because it benefited people rather than assessed property. A fire funding proposal must therefore distinguish assessable fire-related services from general EMS rather than simply shifting the entire fire rescue budget to a parcel bill. [40–41]

The constitutional homestead exemption does not eliminate assessments for special benefits. Consequently, a new flat or insufficiently differentiated assessment can take back a material part of the relief that a modest-income homeowner expected from Amendment 3. Hardship assistance should be financed and designed lawfully without undermining the required apportionment. City residents must also be evaluated according to the actual service provider and geography to avoid charging for a service the unit does not supply.

Stormwater and solid waste

Section 403.0893 authorizes stormwater utility fees and related financing mechanisms. A defensible stormwater proposal should connect charges to the service and burden, commonly examining impervious area and appropriate credits, instead of functioning as an unexplained general-budget surcharge. The necessary local rate study and existing cost allocation were not obtained. This report therefore recommends evaluation, not a specific rate. [42]

Solid waste charges should similarly be tested against actual service costs, existing assessments or charges, collection contracts and service levels. Removing a General Fund subsidy can create relief only to the extent the subsidy actually exists and can lawfully be removed. Counting the full new charge as replacement revenue while leaving its service cost unaccounted for exaggerates the budget benefit. [39]

User fees and building or impact fees

Fees for individualized services should follow a published cost-of-service method, distinguishing private benefit from community benefit. Full cost recovery for an optional commercial facility rental may be appropriate; full cost recovery for basic public access may defeat the service's purpose. Phase-in, installment options and hardship support should be evaluated where legally available.

Building-code enforcement revenues have statutory restrictions under §553.80. They are not an unrestricted county deficit fund. Impact fees under §163.31801 finance qualifying infrastructure needs attributable to new development, with statutory nexus, credit and other requirements; they are not a general source for existing operating deficits. SB 686 also prohibits more burdensome treatment than comparable applications. An enclave-only surcharge designed to punish use of the statute would conflict with that constraint. [43–44; 3, (4) (f)]

Sales surtax and tourist development tax

Section 212.055(2) authorizes a local government infrastructure surtax subject to referendum and statutory restrictions. Its primary infrastructure role should not be advertised as authority for unrestricted annual operating spending. A sales source can broaden contributions to visitors and consumers, but its household burden and statutory limitations require disclosure. Every \$1 billion of taxable transactions at an additional half-cent produces \$5 million gross before sharing and other adjustments; the relevant taxable base is not estimated here. [45]

The county identifies its tourist development tax as five percent. Section 125.0104 restricts authorized uses and establishes conditions for additional levies. A sixth penny is not automatically available merely because

five are currently levied. Eligibility, existing commitments and the tourism plan must be verified. Tourism revenue may relieve the General Fund only where it lawfully funds an eligible expenditure that the General Fund would otherwise bear. It cannot simply be redirected to any county service. [46–47]

Contracts assets grants and utility revenues

Procurement and contract reviews can reduce recurring costs, but savings should be measured after transition costs, contract rights, service risk and new administrative expense. Competitive rebidding, cooperative purchasing where appropriate, scope control, invoice verification and performance enforcement warrant examination. A claim that outsourcing automatically saves money is not supported without a total-cost comparison.

Leasing genuinely surplus property can produce recurring revenue; selling it generally produces a one-time receipt. Section 125.35 supplies procedures for county property dispositions, with exceptions and conditions that must be checked for the particular transaction. A sale of a needed asset followed by replacement or leasing costs can worsen the long-term budget. [48]

Grants can finance eligible projects but may require matches and create future operating obligations. Utility rate increases should be justified by utility costs, debt and lawful transfer rules, not assumed to be freely available general taxes. Restricted money can create General Fund relief only through a lawful substitution for an existing eligible expense. The relief must be counted once, after its corresponding costs and obligations.

13 Our recommendations for the fairest response

The recommendations in this chapter are explicitly analytical value judgments under the fairness criteria below. They are not findings that the statute commands a particular fiscal policy, predictions that commissioners have adopted that policy, or endorsements of a party or applicant. Alternative priorities can reasonably produce different choices; the distributional costs must remain visible.

Define fairness before selecting a revenue source

Fairness has several dimensions: ability to pay; the benefit received; responsibility for causing a cost; equal treatment of similarly situated people; and obligations passed to future residents. No single revenue source satisfies all of them. A flat charge is easy to explain but may consume a much larger share of a low-income household's budget. A value-based levy responds to property value but not perfectly to current cash income. A user fee targets a beneficiary but can deter access to a valuable public service.

Our standard is to preserve essential and broadly shared services while minimizing avoidable costs and disproportionate burdens. The county should assess total annual household and business incidence, including reduced services, instead of celebrating a property-tax reduction while ignoring replacement bills. These recommendations express this report's judgment; they are not claims that the statute itself defines fairness this way.

Recommended sequence

First, reconcile the baseline and protect service outcomes. Publish the five-year gap by fund and taxing unit. Separate recurring expenses, capital commitments, restricted balances, transfers and reserves. Establish minimum service outcomes for emergency response, legally required functions, basic maintenance and access to essential public resources. Do not set percentage cuts before understanding consequences.

Second, defer discretionary expansion and verify efficiencies. Review projects before issuing new obligations, particularly projects that add substantial recurring staffing or maintenance. Compare pause costs against savings; protect projects where delay raises lifecycle costs or forfeits favorable external funding. Verify procurement savings through actual contract changes and invoices. Count a eliminated vacancy only if the position was genuinely funded in the comparison baseline.

Third, correct demonstrable underpricing of individualized services. Publish the cost, subsidy, proposed charge and expected utilization effect. Prefer charges linked to optional private benefit over charges that block broad public access. Use lawful hardship assistance and phase-in where needed. Improving permit process predictability should accompany fee changes so applicants are not paying more for longer delay.

Fourth, use restricted revenues for their lawful purposes and show the resulting relief. Evaluate available motor-fuel authority for eligible transportation costs. Examine stormwater cost allocation and tourism-eligible expenditures. Publish net county proceeds after municipal shares, debt commitments and administrative costs. Do not present an entire restricted fund as available to cover a general operating deficit.

Fifth, compare a calibrated millage response with benefit assessments. A special assessment may be appropriate for a service with a demonstrable property benefit and defensible allocation. It should not be preferred merely because it is called a fee. Model the effect of each alternative on small homes, rental units, small commercial sites, larger commercial sites, vacant land and city residents. In many plausible circumstances, a measured value-based approach with existing exemptions will distribute burdens more fairly than an indiscriminate flat parcel charge; the local tax roll must test that proposition.

Sixth, use reserves only for an explicit transition. Identify the draw, ending balance, replenishment rule and the recurring measure that replaces it. Protect disaster capacity. Do not fund a permanent structural gap by consuming land-sale proceeds or reserves while presenting the budget as sustainably balanced.

Comparative fairness assessment

Option	Principal advantage	Main fairness risk	Our recommendation
Verified procurement savings	Reduces cost without a new levy	Service deterioration if scope is cut invisibly	Pursue with performance measures
Discretionary expansion deferral	Avoids new operating commitments	Growing or underserved areas wait longer	Rank by need and lifecycle cost
Individualized cost-based fees	Connects payment to service	Excludes users with limited income	Target private benefit and provide lawful relief
Motor-fuel funding	Some visitors and through traffic contribute	Burden on long-distance workers and trades	Evaluate for eligible road costs
Value-based millage adjustment	Broad base with existing exemptions	Burden shifts toward taxable rentals and business	Compare openly against assessments
Fire or other benefit assessment	Can align a qualifying service and property benefit	Flat or poorly apportioned charges erode homestead relief	Require benefit study and combined-bill analysis
Across-the-board operating cuts	Administratively simple	Ignores need and unequal service harm	Avoid as the default
Reserve depletion or asset sales	Provides temporary cash	Transfers an unresolved gap to future years	Use only with a transition and replenishment plan

These are analytical judgments based on the legal constraints in Chapter 12 and the documented preparation measures, not empirically estimated distributional results from household microdata.

How to make the recommendation operational

Before a proposed fee or assessment reaches a vote, publish at least six representative profiles: a modest-value homesteaded residence; a higher-value homestead; a renter household and its underlying rental property; a small owner-occupied business site; a tenant business under a lease that may pass through taxes and charges; and a rural household with substantial driving costs. Add city residents where service boundaries differ. Use actual anonymized tax and service data rather than stereotypes.

For each profile, show current county taxes and charges, the amendment-only change, each proposed replacement charge, and the final combined amount. Do not assume landlords pass every tax reduction through to tenants or can pass every increase through immediately; leases and market conditions differ. For a business, distinguish owner and tenant incidence instead of counting both as if each independently pays the entire tax.

The county should also map service reductions by location, travel time and population served. Equal percentage cuts can be unequal in effect where a rural community has only one accessible facility. Measures protecting the largest number of constituents should account for intensity of need and lack of alternatives, not only attendance totals.

14 A transparent budget bridge

A complete bridge should begin with the official modeled gap, then subtract only incremental, legally available recurring savings and recurring net revenues. One-time transition resources belong in a separate column. The result should reconcile to the adopted fund budgets and disclose the remaining gap.

Bridge line	What can be entered now	What remains necessary
FY 2028 modeled county loss	\$68,265,055	Updated forecast and actual future tax roll
Incremental staffing savings	Not yet established by the \$8.6 million planning total	Position-by-position adopted baseline reconciliation
Contract and operational savings	No verified total in reviewed materials	Executed changes and net annual savings
Selected fee increases	No adopted replacement total established	Rates, service cost, utilization and legal restrictions
New benefit funding	Study documented, yield not established	Benefit study, service boundary, apportionment and net relief
Fuel or other restricted revenues	Legal authority and sensitivities identified	Tax base, adoption, distribution and eligible substitution
Millage adjustment	Formula and legal conditions identified	Certified taxable value, rolled-back rate and chosen rate
Reserves and project deferrals	Documented planning resources	Separate one-time cash analysis and recurring consequences

The blank revenue yields are a research result: the reviewed evidence does not yet justify a complete numerical replacement plan. Filling them with plausible-looking amounts would defeat the accuracy standard requested for this report. The county can make the plan decision-ready by publishing the missing schedules.

Illustrative upper-bound check. Even if every dollar of the \$8.6 million staffing planning figure became new recurring savings, \$59,665,055 of the FY 2028 modeled gap would remain. Because that premise overstates what has actually been established, the calculation is an optimistic bound, not a validated savings scenario. It illustrates why vacancies alone cannot plausibly settle the debate. [29, 31; calculation]

Every proposed measure should report gross revenue or savings, directly associated expense, displacement of another revenue source, collection or transition cost, first effective date, recurring net effect, legal restriction and affected groups. This common format permits commissioners and residents to compare choices without confusing a tax base with receipts or a capital appropriation with cash.

15 Where growth and the fiscal proposal intersect

SB 686 can change the timing, location and scale of development opportunities. Amendment 3 can change the taxable value generated by resulting homesteads. Neither permits the inference that every newly certified acre produces immediate net revenue, or that every new home necessarily creates a net deficit. The answer depends on development timing, assessed value, exemptions, service demand and the financing of infrastructure. [1, 28]

The proper project analysis is a phased lifecycle calculation. Estimate incremental annual county revenues, subtract incremental operating and maintenance costs, and account separately for initial capital obligations, developer contributions, impact fee credits, grants and eventual asset replacement. Include transportation, fire and emergency response, drainage, parks and other relevant county services. Identify school and municipal impacts separately rather than putting every public expenditure in the county commission's ledger.

The model should use a realistic absorption schedule and alternative housing values, occupancy, exemptions and service costs. It should distinguish gross taxable value from assessed and exempt value and recognize the transition for residents who receive the larger exemption later. A development that looks favorable before exemptions and replacement costs may look different after them. A project with substantial private infrastructure commitments may also differ materially from one requiring early county investment.

These fiscal findings can inform service planning and lawful agreements. They should not become a new unstated certification criterion or an enclave-only penalty. The statute specifies the certification gates and comparable-treatment requirement. The county must use the powers it retains for their lawful purposes rather than inserting a general fiscal veto into a text that does not contain one. [3–4]

16 A decision guide for commissioners and staff

For an enclave hearing

1. Identify the precise subject legal description and the paragraph (c) route or routes asserted. Resolve which historical facts are being tested as of January 1, 2025.
2. Confirm ownership or control, agricultural continuity, unincorporated status, population and acreage using cited evidence.
3. Publish the perimeter ledger and each numerator and denominator. Show crossings, exclusions, holes and any disputed alternative calculation.
4. Address the expanded acreage residential buildout test separately if the property exceeds 1,280 acres.
5. Identify the adjacent density or intensity comparator and its legally operative units and approvals.
6. Make separate findings on neighboring urban-service qualification and the subject property's services mechanism.
7. Identify preserved protections and requirements that properly belong in development-plan review.
8. Track receipt, report, hearing, decision and rendition dates. Prepare a fact-specific written denial if denying; do not rely on a failed motion as final action.
9. Preserve exhibits and explain why material contrary evidence is accepted or rejected. Apply the same legal methodology to materially similar applicants.
10. State unresolved legal questions expressly and obtain case-specific advice without assuming that a litigation plan suspends the law.

These recommendations organize proof and decision writing. They do not impose a new statutory checklist as an additional substantive condition. [3-4, 13, 27]

For a fiscal hearing

1. State which proposal is being discussed and which year and taxing authority the loss belongs to.
2. Use the EDR scenario as the starting point and disclose any changed assumptions.
3. Reconcile proposed savings to the adopted baseline and separate annual from one-time effects.
4. Publish the authority and restrictions for each fee, tax, assessment or fund transfer.
5. Show the combined household and business burden and service effect, including city and rural geography.
6. Identify implementation dates, voting requirements and the consequences if a proposed revenue source is rejected.
7. Retain a contingency plan for either election result and a reserve replenishment policy.
8. Publish a quarterly ledger of actual collections, realized savings, service indicators and remaining gap.

Records that would materially strengthen the next edition

The highest priority additional enclave records are signed final orders; hearing supplements not included in the downloaded packets; reproducible boundary datasets; certified January 1, 2025 plan maps and ordinances; capacity commitments and proposed service agreements; and the actual court docket and orders. The highest priority fiscal records are the final appropriation and millage resolutions; the detailed \$100 million

project hold list; the position reconciliation; the 1,137-fee inventory and cost studies; the MSBU study; restricted fund and debt schedules; and a household incidence model.

Those missing records limit adjudicative and numerical conclusions, not the verified statutory reading. Future revisions should identify each changed conclusion, the new evidence and its effective date. A clear correction log would serve the Coalition's commitment to accountable public reasoning.

17 Public questions answered

Is SB 686 just a St. Johns County law? No county is named as its exclusive beneficiary. It is a general law with selective eligibility conditions, and an official Martin County application is documented. [1, 26]

Must the property be surrounded on all four sides? No. Use the relevant percentage of total boundary length or the separate rural study area route, together with the remaining conditions. [4]

Can a road or river be crossed? Yes, for the perimeter calculation the law expressly directs consideration of adjacent parcels across a right-of-way, water body or canal. It does not resolve every mapping or repeated-crossing question. [4]

Can the county require every project to appear in the CIE? Not as a universal reading of paragraph (d), which contains alternatives. A CIE may independently matter to the urban service area definition and to other applicable planning requirements. [4, 7]

Does a utility service map settle the urban service area question? No. The state definition requires comprehensive plan identification and the specified facilities or CIE basis, or express plan identification as an urban service area. [4, (57)]

May an owner leave out other land? The text does not require all commonly owned land to be included. Whether a particular configuration qualifies still depends on its legal and historical boundaries and every applicable criterion. [4]

Does certification immediately authorize thousands of homes? It establishes a statutory pathway and conforming treatment for qualifying plans. Density comparators, development plans, remaining applicable requirements and infrastructure still matter. [3]

Does SB 686 create the forecast property-tax loss? No. The cited \$68.3 million and \$136.1 million county forecasts concern Amendment 3. SB 686 has different, project-specific fiscal implications. [1, 28–29]

Would eliminating libraries and parks solve the gap? The county's combined parks, recreation and libraries property-tax allocation is too small to cover the first modeled loss even if eliminated. That comparison also understates the public harm of such a choice. [30; Chapter 11 calculation]

Can a new fee erase a homestead tax saving? It can reduce or exceed the saving for a particular household. Special benefit assessments are not covered by the homestead exemption, which is why the combined bill must be shown. [28; 40–41]

Can the county just increase every fee until the budget balances? No. Authority, service costs, benefit requirements, statutory restrictions, collection effects and fairness constrain the options. Building and impact fees have particular restrictions. [39–44]

Is there already a court ruling settling all these SB 686 questions? None was identified in the reviewed materials. Reported litigation exists, and the report does not claim a complete docket search or an absence of later orders. [25]

18 Glossary of statutory and official terms

Entries below distinguish exact statutory wording, statutory paraphrase and local terminology. The glossary does not create new legal definitions. Where the act supplies no special definition, that absence is stated. Current 2026 subsection numbers may differ from those printed in older plans or staff analyses.

Agricultural enclave. The full operative definition is §163.3164(4), reproduced in Appendix A. Its introductory words describe an unincorporated, undeveloped parcel or parcels keyed to January 1, 2025, followed by cumulative and alternative conditions. An enclave in ordinary speech need not meet this legal definition. [4]

Bona fide agricultural purposes. Exact core statutory wording: “good faith commercial agricultural use of the land.” Section 193.461(3)(b) supplies relevant classification factors. The enclave statute adds the five-year continuous-use requirement. [5; 4]

Capital improvement. Statutory paraphrase: physical assets constructed or purchased to provide, improve or replace a public facility, typically large in scale and high in cost. The cost is generally nonrecurring and may require multiyear financing. The definition also addresses assets identified as existing or projected needs in comprehensive plan elements. [4, (7)]

Capital improvements element or CIE. The comprehensive plan element required by §163.3177(3), including the statutory capital facility and financing schedule. It is not automatically every capital project list maintained by government. [7]

Compatibility. Statutory paraphrase: a condition in which uses or activities can coexist in relative proximity in a stable fashion over time without one being unduly negatively affected by the other. It is a defined planning concept, not a substitute for the enclave's specific tests. [4, (9)]

Comprehensive plan. Statutory reference to a plan meeting §§163.3177 and 163.3178. It includes legally adopted elements; maps and policies must be matched to the relevant effective date. [4, (10)]

Concurrency. A statutory framework governing facility availability relative to development under §163.3180. Different facilities and local choices have different rules. The enclave definition expressly incorporates applicable concurrency provisions. [8; 4, (4)(d)]

Density. Exact statutory definition: “an objective measurement of the number of people or residential units allowed per unit of land, such as residents or employees per acre.” Density is distinct from total acreage. [4, (12)]

Development. Incorporated statutory meaning under §380.04, including specified land changes and enumerated exceptions. Its application must account for the more specific existing industrial, commercial or residential wording in the enclave test. [4, (14); 6]

Development order. Statutory paraphrase: an order granting, denying or granting with conditions an application for a development permit. [4, (15)]

Development permit. Statutory paraphrase: includes listed permits, rezonings, certifications and other official actions having the effect of permitting development. A particular certification's legal consequences still depend on its governing statute. [4, (16)]

Future land use map or FLUM. The map associated with the comprehensive plan's future land use element, assigning future uses and relevant development parameters. The enclave statute separately refers to the zoning map; one should not be substituted for the other where both are required. [7, (6)(a); 4, (4)(c)]

Impact fee. The Community Planning Act definition and §163.31801 govern the term and restrictions. It generally concerns a charge to fund infrastructure needs attributable to new development; it is not a label that converts any operating charge into a lawful growth fee. [4, (23); 43]

Intensity. Exact statutory wording describes “an objective measurement of the extent to which land may be developed or used.” The definition includes use of space and use of or demand on natural resources, facilities and services. It is not necessarily interchangeable with residential units per acre. [4, (24)]

Land development regulations. Statutory paraphrase: ordinances regulating development, including specified categories such as zoning, subdivision and building and other development controls, subject to the statutory definition. [4, (28)]

Urban service area. Exact definition appears in Appendix A; current numbering is §163.3164(57). It concerns comprehensive plan identification and facilities or CIE identification, and expressly includes areas named as urban service areas in the plan. [4]

Urban service district and urban service line. Used in the enclave statute but not given the same standalone general definition as urban service area in the reviewed definition section. The actual legal source and geography must be identified. [3–4]

Development Area Boundary. A local St. Johns County planning designation. Its relationship to the state's urban service area definition requires evidence and analysis; it is not itself a term newly defined by SB 686. [14–15]

Rural study area. The enclave alternative refers to an established area adopted in the comprehensive plan and intended for residential uses. SB 686 supplies those predicates but no comprehensive standalone definition or statewide map. [4, (4)(c)3]

Adjacent. Used repeatedly, without a bespoke distance, corner-contact or general geometry definition in SB 686. The express road and water crossing rule resolves part of the perimeter inquiry but does not define every use of adjacent in the act. [1]

Perimeter. Used without a prescribed statewide survey formula, rounding rule or GIS protocol in the act. This report recommends boundary-length calculations with disclosed assumptions. [4]

Existing development. The act supplies the qualifying use categories but no detailed percentage measurement code for partially developed neighboring parcels. Read with the development cross-reference and the particular subparagraph. [4; 6]

Undeveloped and controlling entity. Operative words in the law without bespoke, comprehensive definitions in SB 686. Their application requires actual evidence and legal analysis; neither should be treated as an invitation to invent a convenient local definition. [1, §§1–2]

Right of way body of water and canal. Features expressly identified in the crossing rule. SB 686 does not prescribe a maximum width or a complete rule for matching opposite boundaries. [4, final sentence of (4)]

Rendition. The event used by the statute to start the applicant's 30-day denial-review period. The act does not define all procedural requirements for rendition; distinguish the vote, written order and legally operative rendering of the decision. [3, (4)(d)]

Millage. A tax rate expressed in dollars per \$1,000 of taxable value. One mill is \$1 per \$1,000. The legal rate-setting process and limits are addressed in §200.065. [34]

Rolled back rate. The statutory calculation under §200.065(1), used as the reference for rate adoption and notices. It is not necessarily the prior year's nominal rate. [34]

Special assessment. A charge tested for special benefit to the assessed property and fair, reasonable apportionment under Florida Supreme Court precedent. It differs from a general tax even when both appear on a tax bill. [40–41]

Municipal service benefit unit or MSBU. A county service financing arrangement under §125.01. The existence of the unit does not independently validate every proposed assessment. The county has announced a study, not a final universal charge in the sources reviewed. [39; 31]

Recurring and one time. Budget-analysis terms used in this report to distinguish an annual continuing effect from a temporary receipt, reserve draw or timing change. These are not new definitions enacted by SB 686.

Undefined expressions used in public debate. Functionally combined parcels, maximum density acreage, automatic utility entitlement and flawless application are not defined SB 686 standards in the enacted text. Use the actual ownership, acreage, density, service and proof requirements instead. [1]

Appendix A Operative law and essential definitions

The following clean reading text is derived from the enrolled act with deleted language removed and line numbers omitted. Formatting and spacing are normalized. The official enrolled text and published statutes control in any discrepancy. The complete operative amendments and sunset provisions are included so readers can test this report's analysis against the law. [1–4]

Section 1. Subsection (4) of section 163.3162, Florida Statutes, is amended to read: 163.3162 Agricultural lands and practices.—
(4) PUBLIC HEARING PROCESS.—

(a) Notwithstanding any other law or local ordinance, resolution, or regulation, the owner of a parcel or parcels of land, or such owner's authorized agent or controlling entity, may apply to the governing body of the local government for certification of the parcel or parcels as an agricultural enclave as defined in s. 163.3164 if one or more adjacent parcels or an adjacent development permits the same density as, or higher density than, the proposed development. An applicant seeking such certification may not use the perimeter of another parcel certified by the local government as an agricultural enclave to meet the definition of the term "agricultural enclave."

(b) Within 30 days after the local government's receipt of such an application, the local government shall provide to the applicant a written report detailing whether the application complies with the requirements of paragraph (a).

(c) Within 30 days after the local government provides the report required under paragraph (b), the local government shall hold a public hearing to approve or deny certification of the parcel or parcels as an agricultural enclave. If the local government does not approve or deny certification of the parcel or parcels as an agricultural enclave within 90 days after receipt of the application, the parcel or parcels must be certified as an agricultural enclave.

(d) If the application is denied, the governing body of the local government must issue its decision in writing with detailed findings of fact and conclusions of law. The applicant may seek review of the denial by filing a petition for writ of certiorari in the circuit court within 30 days after the date the local government renders its decision.

(e) If the application is approved, the owner of the parcel or parcels certified as an agricultural enclave, or the owner's authorized agent or controlling entity, may submit development plans for single-family residential housing which are consistent with the land use requirements, or future land use designations, including uses, density, and intensity, of one or more adjacent parcels or an adjacent development. A development for which plans are submitted under this paragraph must be treated as a conforming use, notwithstanding the local government's comprehensive plan, future land use designation, or zoning. If development within an agricultural enclave affects an established wildlife corridor, the local government is encouraged to incorporate site design measures that maintain habitat permeability, including clustering, open space retention, and wildlife crossing accommodations, where feasible.

(f) A local government may not enact or enforce a law or regulation for an agricultural enclave which is more burdensome than for other types of applications for comparable uses or densities. A local government shall treat an agricultural enclave that is adjacent to an urban service district as if such enclave is within the urban service district.

(g) Within 30 business days after the local government's receipt of development plans under paragraph (e), the local government and the owner of the parcel or parcels certified as an agricultural enclave must agree in writing to a process and schedule for information submittal, analysis, and final approval, which may be administrative in nature, of the development plans. The local government may not require the owner to agree to a process that is longer than 180 days in duration or that includes further review of the plans in a quasi-judicial process or public hearing.

(h) Notwithstanding paragraph (e), a parcel or parcels certified as an agricultural enclave as defined in s. 163.3164(4)(c)1.c. which are adjacent to an interstate highway may be developed for commercial, industrial, or single-family residential purposes if one or more adjacent parcels or an adjacent development permits the same density or intensity as the proposed development .

(i) Nothing within this subsection relating to agricultural enclaves shall preempt or replace any protection currently existing for any property located within the boundaries of any of the following areas: 1. The Wekiva Study Area, as described in s. 369.316. 2. The Everglades Protection Area, as defined in s. 373.4592(2). 3. Any area of critical state concern, as designated in s. 380.055, s. 380.0551, s. 380.0552, s. 380.0553, or s. 380.0555. 4. Any portion of a property encumbered by a recorded conservation easement as defined in s. 704.06. 5. A military installation or range identified in s. 163.3175(2).

Section 2. Subsection (4) of section 163.3164, Florida Statutes, is amended to read: 163.3164 Community Planning Act; definitions.—As used in this act:

(4) “Agricultural enclave” means an unincorporated, undeveloped parcel or parcels that, as of January 1, 2025:

(a) Are owned or controlled by a single person or entity;

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

(c)1. Are surrounded on at least 75 percent of their perimeter by: a. A parcel or parcels that have existing industrial, commercial, or residential development; b. A parcel or parcels that the local government has designated, in the local government’s zoning map and future land use map, as land that is to be developed for industrial, commercial, or residential purposes, and at least 50 percent of such parcel or parcels is existing industrial, commercial, or residential development; or c. A combination of an interstate highway and a parcel or parcels that are within an urban service district, area, or line and that the local government has designated in the local government’s future land use map as land that is to be developed for industrial, commercial, or residential purposes; 2. Do not exceed 700 acres and are surrounded on at least 50 percent of their perimeter by a parcel or parcels that the local government has designated on the local government’s future land use map as land that is to be developed for industrial, commercial, or residential purposes; and the parcel or parcels are surrounded on at least 50 percent of their perimeter by a parcel or parcels within an urban service district, area, or line; or 3. Are located within the boundary of an established rural study area adopted in the local government’s comprehensive plan which was intended to be developed with residential uses;

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

(e) Do not exceed 1,280 acres; however, if the parcel or parcels are surrounded on at least 75 percent of their perimeter by existing or authorized residential development that will result in a density at buildout of at least 1,000 residents per square mile, the area must be determined to be urban and the parcel or parcels may not exceed 4,480 acres, unless such parcel or parcels exceeding 1,280 acres are within the affected counties covered by the water protection plan specified in s. 373.4595(4)(c); and

(f) Are located within a county with a population of 1.75 million or less. For purposes of this subsection, population is determined in accordance with the most recent official estimate pursuant to s. 186.901.

Where a right-of-way, body of water, or canal exists along the perimeter of a parcel, the perimeter calculations of the agricultural enclave must be based on the adjacent parcel or parcels across the right-of-way, body of water, or canal.

Section 3. The amendments made by this act to ss. 163.3162(4) and 163.3164(4), Florida Statutes, shall expire January 1, 2028, and the text of those subsections shall revert to that in existence on June 30, 2026, except that any amendment to such text enacted other than by this act shall be preserved and continue to operate to the extent that such amendment is not dependent upon the portions of text which expire pursuant to this section.

Section 4. This act shall take effect July 1, 2026.

Urban service area

“Urban service area” means areas identified in the comprehensive plan where public facilities and services, including, but not limited to, central water and sewer capacity and roads, are already in place or are identified in the capital improvements element. The term includes any areas identified in the comprehensive plan as urban service areas, regardless of local government limitation. [4, §163.3164(57)]

Appendix B The Coalition mission statement

The following author supplied Coalition poster establishes the publication's civic identity and communications commitments. It is reproduced as supplied, rather than converted into an unsupported claim of government affiliation or independent accreditation. [51]

THE 1565 COALITION

SMALL-BUSINESS OWNERS, OPERATORS, AND SUPPORTERS IN ST. JOHNS COUNTY.

OPEN A DOOR. HIRE SOMEONE. KEEP A TENANT ON A TIMELINE.

THE COALITION SPEAKS TO COUNTY POLICY AND PROCESS — HOW A RULE, A FEE, OR A REVIEW CYCLE ACTUALLY WORKS WHEN YOU ARE TRYING TO OPEN A DOOR, HIRE SOMEONE, OR KEEP A TENANT ON A TIMELINE.

WE ARE INDEPENDENT. WE ARE NOT THE COUNTY, AND WE DO NOT SPEAK FOR IT.

WHAT WE WILL DO HERE IS CONCRETE.

- If a change adds review cycles or weeks before a business can open, we will say that in days and dollars, not adjectives.
- If we take a position on a live item, we will name the body, the date, the stage, and the decision actually in front of it.

WHAT WE WILL NOT DO:

- TREAT THIS PAGE AS JOURNALISM
- NAME PRIVATE RESIDENTS OR EMPLOYEES
- OR PUT SOMEONE ELSE'S STORY ON THIS WALL WITHOUT THAT PERSON'S WRITTEN OKAY FOR THAT USE.

IF A COUNTY PROCESS COST YOUR BUSINESS TIME OR MONEY — a permit, a review, a fee, a resubmittal — message this page and tell us what it was.

DATE | PROCESS | WHAT IT COST YOU

WE LOG THAT SO THE NEXT CONVERSATION WITH THE COUNTY IS BUILT ON WHAT OWNERS ACTUALLY RAN INTO, NOT A SLOGAN.

#STJOHNSCOUNTY | #STAUGUSTINE

THIS PAGE IS SPONSORED BY DONATIONS FROM THE OUTPOST AT OLD MOULTRIE ROAD.

The Outpost is a separate business. Coalition positions are Coalition positions.

Appendix C Standards for a citizen packet reviewer

Purpose and limits

An automated packet reviewer should help a resident, commissioner or applicant trace each required finding to evidence and controlling law. It cannot guarantee a perfect legal determination, replace a licensed survey, conclusively authenticate an exhibit, or decide an unresolved question of statutory interpretation. Its useful product is a reproducible evidence assessment with disclosed limits. It must not generate a single approval score that hides failure of a mandatory element.

The same standards apply to applicants and objectors. A document's presence in a Clerk packet establishes that it is in that packet; it does not transform every assertion into an official county finding. A sworn affidavit is evidence with an identified source, subject and basis of knowledge. A staff finding is an official assessment. A board vote is an official action. A judicial holding has a different legal status. Each must retain its identity in the output.

Required finding categories

Category	Meaning	Permitted next conclusion
Supported on submitted evidence	Located evidence supports the specified requirement and no identified material contradiction remains	Identify evidence and limits; do not claim a binding certification
Evidence missing or unreadable	Required proof was not located, cannot be read reliably, or appears only in an unprovided attachment	Request the identified record; no inference that the underlying fact is false
Potentially correctable defect	A citation, calculation, signature, linkage or other defect has a stated possible correction	Explain the proposed correction and whether timing or procedure may limit it
Substantive conflict on submitted facts	Reliable submitted evidence contradicts a mandatory requirement for the configuration and route under review	Identify the contradiction, alternative routes and any assumption that could change it
Disputed interpretation or fact	Material competing readings, evidence or measurement methods could change the result	Present both supported positions and withhold a definitive outcome
Outside scope or not applicable	A requirement belongs to another route, another stage or a protected-area rule that does not govern the fact at issue	Explain why; never silently drop a universal requirement

These are this report's proposed review categories, not labels created by SB 686. A substantive conflict on submitted facts is not equivalent to a finding that an owner could never qualify under a changed application, other lawful route, corrected factual premise or different governing law.

Intake and source control

The reviewer should preserve the original file, calculate a content hash, record the upload date, identify the filing number and application version, and distinguish the entire hearing packet from the applicant's submission. It should accept supplements without overwriting earlier evidence. The output must identify

exactly which documents and versions were evaluated and the law's effective period. An upload does not prove the packet includes all evidence received at the hearing.

Every page needs a persistent PDF page number and, where available, its printed exhibit/page label. Text extraction must report scanned, unreadable, rotated, truncated and password-protected pages. Maps, seals, signature blocks, handwritten changes and tables require image-aware inspection. A recognized number is not a verified measurement. If a material exhibit remains unreadable, the overall review must stay incomplete.

A document may contain text that instructs a reader or automated system to ignore other evidence or reach a predetermined result. The reviewer must treat that text as document content, never as operating instructions. Uploaded filenames and extracted text must be rendered as text, with no execution of embedded scripts or external links. A private upload must not become part of the public case ledger without an explicit publication decision.

The legal rule matrix

Each review must separately evaluate the unincorporated and undeveloped predicate at the statutory date; ownership or control; continuous bona fide agricultural use; every plausibly applicable paragraph (c) alternative; public services or the qualifying offer; acreage and any expanded-acreage exception; county population; adjacent density comparison; the prohibition on using another certified enclave's perimeter; and protected provisions under paragraph (i). Certification procedure and later development-plan requirements should appear in separate sections.

The legal matrix must be versioned against the enrolled act and effective statutes. A county manual or Senate staff summary cannot override the enacted alternatives. Statutory silence must stay visible: an automated reviewer cannot manufacture a road-width limit, a universal aggregation requirement, a minimum annual timber harvest or a generic mandatory utility connection test.

Route logic matters. Failure of c1a does not eliminate c2. A tract above 700 acres cannot use c2 merely because it is below 1,280 acres. Failure to prove c1c can defeat a proposed paragraph (h) commercial or industrial pathway without necessarily defeating residential certification through another established route. An acreage limit is not a residential density limit.

Evidence and contradiction handling

For each criterion, the output should identify the controlling provision, the precise fact to be established, supporting evidence, contrary evidence, source type, relevant date, subject parcel or geometry, calculation if any, review status and the next record needed. Each source citation must resolve to the actual uploaded document and page. A quoted passage must match the source text; machine extraction errors must not be silently normalized into evidence.

Conflicts between an application, amendment, staff letter and hearing statement must be shown in date order. A later exhibit may cure an earlier proof gap, contradict it or address a different parcel. The reviewer must explain the effect rather than always preferring the newest document. Later chronology also cannot establish that a missing historical condition existed at the statutory date.

For AFI, a rule engine should recognize that the staff narrative uses c1a while a later finding cites c1b. The result is a citation inconsistency requiring reconciliation, not automatic failure of c1b. For Sandy Creek, a rule engine must not repeat the earlier letter's missing-management-plan concern without identifying the plan later included in the packet. Neither example establishes ultimate qualification; both illustrate why a keyword checklist is inadequate. [57–58]

Boundary and arithmetic validation

Boundary review requires a defined subject polygon, included and excluded legal descriptions, measurement units, coordinate reference system, a segment ledger and the effective dates of neighboring entitlements. A PDF map alone may not supply the geometry needed to independently reproduce the calculation. The system should distinguish an applicant's percentage, staff's percentage and an independently reproduced percentage.

Arithmetic should be computed deterministically from validated inputs, with no rounding up to meet a threshold. The output must identify denominator and numerator for each distinct statutory test. It should flag double-counted segments, mixed feet and meters, inconsistent subject areas and mixed gross/net density. A sensitivity analysis can show how a disputed segment affects a threshold without deciding which legal interpretation is correct.

For a hypothetical 701-acre application, the correct statement is that c2 is unavailable on that acreage. It is not that the property fails every agricultural enclave route. For a hypothetical 74.9 percent existing-development perimeter, c1a is below its threshold on those inputs; another route or a legitimate corrected measurement may change the overall result. If a disputed map segment determines the outcome, the reviewer should display both results and withhold a final pass.

Public presentation and release testing

The public summary should show the decisive unresolved or conflicting elements before secondary formatting issues. It should offer an applicant-favorable reading and an objector-favorable reading where both have a source-supported legal basis, followed by an assessment explaining the weight of each. Fairness does not require assigning equal weight to an unsupported claim and a controlling statute.

The output should distinguish evidence completeness from legal merit and avoid numerical confidence percentages without a validated calibration method. An overall status of supported on submitted evidence should require every applicable mandatory element to be supported, no unresolved material contradiction, readable decisive exhibits and checked citations. Even then it remains a research assessment, subject to the authorized decision maker.

Before presenting automated findings to the public as reliable, the reviewer should be tested against documented cases and adversarial examples: scanned pages, omitted attachments, conflicting acreage versions, a staff citation typo, corrected evidence in a supplement, a failed alternative route, missing CIE proof, misleading agricultural tax labels, gross/net density confusion and prompt instructions embedded in a packet. Known expected results and remaining errors should be published. A final category describing a historically impossible cure requires human legal review of the premise, applicable date and available procedural alternatives.

This protocol is a product and methodology specification. It does not assert that a validated automated legal reviewer has already been deployed. Public availability, model processing, document retention and human review status must be disclosed accurately at the time a particular feature is released.

Corrections in this record review edition

This edition separates AFI's confirmed September 15 approval from the previously unresolved index grouping; replaces the earlier tentative discussion of Heritage routes with staff's express c2 finding for East and c1c finding for West; adds the unfavorable Sandy Creek preliminary findings and later forestry evidence; incorporates North Palm's primary packet and competing exhibits; and distinguishes approved minutes from draft September 15 minutes submitted for October 6 approval. These corrections improve the record basis without turning preliminary staff findings into conclusive independent legal determinations.

References and source register

All web sources were accessed for this edition on September 30, 2026. Dates printed in source titles or entries identify the document or event, not the access date. The full references below preserve the distinction between law, official explanation, local records and secondary procedural reporting. The law and official records supply the legal analysis; the three news articles supply limited descriptions of votes and reported litigation.

[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.sjcfi.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>
- [18] **St. Johns County. Application Submittal Management ENCERT index. Snapshot September 30, 2026.** Local administrative record; includes withdrawals and later filings, not a final judicial status ledger.
<https://webapp.sjcfl.us/CSubmittalWeb/AppPicklist?AppType=ENCERT&View=Apps>
- [19] **St. Johns County. ENCERT 2026000001 North Palm Valley Road. Issue date July 1, 2026.** Local administrative record; description and requested density note.
<https://webapp.sjcfl.us/CSubmittalWeb/Record?AppNum=2026000001&AppType=ENCERT>
- [20] **St. Johns County. ENCERT 2026000005 Heritage Development East. Issue date July 7, 2026.** Local administrative record; acreage, location, requested density and hearing notes.
<https://webapp.sjcfl.us/CSubmittalWeb/Record?AppNum=2026000005&AppType=ENCERT>
- [21] **St. Johns County. ENCERT 2026000006 Heritage Development West. Issue date July 7, 2026.** Local administrative record; acreage, location, requested density and hearing notes.
<https://webapp.sjcfl.us/CSubmittalWeb/Record?AppNum=2026000006&AppType=ENCERT>
- [22] **St. Johns County. ENCERT 2026000009 Entrada. 2026.** Local administrative record; project description. Withdrawal status drawn from the index.
<https://webapp.sjcfl.us/CSubmittalWeb/Record?AppNum=2026000009&AppType=ENCERT>
- [23] **J. Brooks Terry for Jacksonville Daily Record. St Johns County denies 4462 acre Davis agricultural enclave. September 15, 2026.** Secondary procedural reporting only. Legal characterizations in the article are not adopted as authority.
<https://www.jaxdailyrecord.com/news/2026/sep/15/st-johns-county-denies-4462-acre-davis-agricultural-enclave/>
- [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/>
- [26] **Martin County. Kanner 96th Street agricultural enclave certification agenda item. August 11, 2026.** Local administrative record. Staff recommendation to deny is not treated as a verified final board disposition.
<https://martin.legistar.com/LegislationDetail.aspx?FullText=1&GUID=EE9067F5-2BBD-4BCF-B18E-3614CEBA9B92&ID=8162202>
- [27] **Florida Supreme Court. Dusseau v Metropolitan Dade County Board of County Commissioners. 2001.** Primary judicial opinion, 794 So. 2d 1270. Opinion text reproduced by Justia; its editorial summary is not relied upon.
<https://law.justia.com/cases/florida/supreme-court/2001/sc95217.html>

[28] Florida Legislature. CS HJR 1F enrolled text. 2026 special session F. Primary proposed constitutional text. Proposed Article VII §§4, 6, 9 and effective date. Pending voter approval at cutoff.

<https://www.flsenate.gov/Session/Bill/2026F/1F/BillText/er/PDF>

[29] Florida Revenue Estimating Conference and EDR. Revenue impact results CS HJR 1F. Reviewed June 12 and July 10, 2026. Official fiscal model. Methodology PDF pp.1–3, county and municipal row PDF p.16, printed p.697.

<https://edr.state.fl.us/Content/conferences/revenueimpact/archives/2026F/pdf/impact0710.pdf>

[30] St. Johns County. Proposed Property Tax Amendment 3. Snapshot September 30, 2026. Official local public information; property-tax allocation, election and forecast overview.

<https://www.sjcfl.us/amendment-3/>

[31] St. Johns County. St Johns County Outlines Preparations for Proposed Property Tax Amendment 3. September 11, 2026. Official preparation announcement; holds, staffing categories, reserves, fee review and benefit-unit study.

<https://www.sjcfl.us/sjc-outlines-preparations-for-proposed-property-tax-amendment-3/>

[32] St. Johns County. Fiscal Year 2027 Budget. Snapshot September 30, 2026. Official budget publication page; workbook totals and carryforwards. Full fund appropriation audit not performed.

<https://www.sjcfl.us/2027-budget/>

[33] St. Johns County. SJC to Host Property Tax Amendment 3 Town Hall on September 29. September 23, 2026. Official meeting notice; event purpose and presenters. This is not a meeting transcript.

<https://www.sjcfl.us/sjc-property-tax-amendment-3-town-hall-september-29/>

[34] Florida Legislature. Florida Statutes section 200.065. 2026. Primary law; rolled-back rate, hearing and millage vote provisions, especially (1), (5), (7).

<https://www.flsenate.gov/Laws/Statutes/2026/200.065>

[35] Florida Legislature. CS SB 4F enrolled text. 2026 special session F. Primary legislation; separate property-tax administration measure. Cross-checked against current §200.065.

<https://www.flsenate.gov/Session/Bill/2026F/4F/BillText/er/PDF>

[36] Florida Department of Revenue. 2026 Fuel Tax Rates Tax Information Publication 25B05 05 charts. 2026 rates. Official rates; St. Johns County motor-fuel tax row and ninth-cent/additional local option columns.

https://floridarevenue.com/taxes/Documents/fuel_charts/25B05-05_chart.pdf

[37] Florida Legislature. Florida Statutes section 336.025. 2026. Primary law; local option motor-fuel taxes, voting, timing, distribution and restricted uses.

<https://www.flsenate.gov/Laws/Statutes/2026/336.025>

[38] Florida Legislature. Florida Statutes section 336.021. 2026. Primary law; ninth-cent fuel tax and administration.

<https://www.flsenate.gov/Laws/Statutes/2026/336.021>

[39] Florida Legislature. Florida Statutes section 125.01. 2026. Primary law; county powers and municipal service units.

<https://www.flsenate.gov/Laws/Statutes/2026/125.01>

[40] Florida Supreme Court. Morris v City of Cape Coral. May 7, 2015. Primary judicial opinion, 163 So. 3d 1174. Opinion text reproduced by Justia; special benefit and apportionment analysis.

<https://law.justia.com/cases/florida/supreme-court/2015/sc14-350.html>

[41] Florida Supreme Court. City of North Lauderdale v SMM Properties Inc. August 22, 2002. Primary judicial opinion, 825 So. 2d 343, SC00-1555. Court opinion archived by Florida State University.

<https://library.law.fsu.edu/Digital-Collections/flsupct/dockets/sc00-1555/op-sc00-1555.pdf>

[42] Florida Legislature. Florida Statutes section 403.0893. 2026. Primary law; stormwater funding mechanisms.

<https://www.flsenate.gov/Laws/Statutes/2026/403.0893>

[43] Florida Legislature. Florida Statutes section 163.31801. 2026. Primary law; Florida Impact Fee Act.

<https://www.flsenate.gov/Laws/Statutes/2026/163.31801>

[44] Florida Legislature. Florida Statutes section 553.80. 2026. Primary law; building code enforcement and fee restrictions.

<https://www.flsenate.gov/Laws/Statutes/2026/553.80>

[45] Florida Legislature. Florida Statutes section 212.055. 2026. Primary law; discretionary sales surtaxes, particularly infrastructure surtax subsection (2).

<https://www.flsenate.gov/Laws/Statutes/2026/212.055>

[46] Florida Legislature. Florida Statutes section 125.0104. 2026. Primary law; tourist development taxes, eligibility and uses.

<https://www.flsenate.gov/Laws/Statutes/2026/125.0104>

[47] St. Johns County. Tourist Development Council Budget and Tax. Snapshot September 30, 2026. Official local information; current five percent tourist development tax and governing ordinances.

<https://www.sjcfl.us/tdc-budget-tax/>

[48] Florida Legislature. Florida Statutes section 125.35. 2026. Primary law; county property disposition authority and conditions.

<https://www.flsenate.gov/Laws/Statutes/2026/125.35>

[49] The Outpost. Our story. Snapshot September 30, 2026. First-party public biography, not an independent credential audit.

<https://theoutpostsjc.com/yard>

[50] St. Johns County Clerk of Court. Resolution 2023 61 procurement packet. 2023. Official public record; February 2, 2023 notice of intent to award and solicitation contact identify Justin Tahliramani as Senior Procurement Coordinator. PDF pp.36 and 83.

<https://www.stjohnsclerk.com/minrec/Resolutions/2023/RES2023-61.pdf>

[51] The 1565 Coalition. Civic mission poster supplied for this project. Author supplied. First-party organizational statement reproduced in Appendix B; local original retained with research.

Author supplied original reproduced in Appendix B.

[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; c2 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; c1c 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.sicfl.us/CSubmitalWeb/AppPicklist?ApplType=ENCERT&View=Apps>