

Interests disclosed. The Coalition's founder, Justin Tahilramani, owns commercial and investment real estate in St. Johns County, and his business, The Outpost @ Old Moultrie Rd, sponsors the Coalition. Neither has any interest in the seven filings in this report. The Coalition takes no position on whether any of these parcels should be built.

REPORT 03 · ENCLAVE WATCH

Seven pending agricultural enclave filings in St. Johns County

1,086 acres. Seven applications. One definition that could decide the perimeter test for four of them.

Under SB 686 the County must report on each filing within 30 days, hear it within 30 more, and certify it by default if it has not acted within 90. Before any of that happens, this is what the public record shows about every site: who owns it, what has been proposed there before, what surrounds it parcel by parcel, and which statutory route—if any—it can reach.

1,086

acres across the seven filings still pending

4 of 7

can reach a route only if the County's Development Area Boundary is an "urban service area"

0%

of any site's perimeter lies in a mapped Urban Service Area

Nov. 30

first 90-day default date: four filings received Sept. 1, 906.5 acres

SUMMARY

Where each filing stands

Sixteen enclave certifications have been filed in St. Johns County since the law took effect July 1. One certification is standing (AFI). Three were denied: North Palm Valley Road, and Heritage East and West, which the Board approved and then reversed on September 28. Five were withdrawn and seven are pending. The

first four County reports were due October 1; as of October 2 the County portal records one, for Carter Road, as emailed to the applicant on October 1, and none has been posted publicly.

The table reads left to right from the record to the screen. The four percentages are the Coalition's parcel-by-parcel estimate of the site's perimeter that adjoins existing development (route c1a), land designated residential, commercial or industrial on the Future Land Use Map (the first half of route c2), land inside the County's Development Area Boundary, and land inside a mapped Urban Service Area (the two readings of the second half of route c2). The last column is the County's calendar: report due · hearing by · 90-day default.

FILING	ACRES	OWNER	WHAT CAME BEFORE	BUILT	FLUM	DEV. AREA	URBAN SVC AREA	WHAT IT TURNS ON	REPORT · HEARING · DEFAULT
2026-10 Adler Creek	594.42	Windcrest Farms LLC	PUD for 1,682 homes denied 2022; first enclave filing withdrawn Aug. 10	4.9%	30.6%	30.7%	0%	Scenario only; filed boundary not reviewed. No route on either scenario	Oct. 1 · Oct. 20 (tent.) · Nov. 30
2026-11 Carter Road	200.75	Carter Road Associates LLLP	376-home PUD denied 5-0, Sept. 2024; ~100 ac wetlands	25.8%	100%	100%	0%	Route c2, only if DAB = urban service area	Oct. 1 · by Oct. 31 · Nov. 30
2026-12 Star IV	70.83	Star Investors IV Limited LLLP	176-ac enclave filing withdrawn Aug. 7	5.7%	16.4%	16.4%	0%	Scenario only; filed boundary not reviewed. No route on any scenario	Oct. 1 · by Oct. 31 · Nov. 30
2026-13 Pacetti Oaks	40.5	Chapman Revocable Trust	216-townhome PUD expired 2024 unheard	13.5%	100%	100%	0%	Route c2, only if DAB = urban service area; house and deed-date questions	Oct. 1 · by Oct. 31 · Nov. 30
2026-14 Osceola Lakes North	103	Geoffrey A. Young	640-unit workforce rezoning denied 2024; 143-ac filing withdrawn	52.8%	85.8%	86.1%	0%	Route c2, only if DAB = urban service area; c1a 53%	Oct. 14 · by Nov. 13 · Dec. 13 (if received Sept. 14)

FILING	ACRES	OWNER	WHAT CAME BEFORE	BUILT	FLUM	DEV. AREA	URBAN SVC AREA	WHAT IT TURNS ON	REPORT · HEARING · DEFAULT
			Aug. 11; split						
2026-15 Osceola Lakes South	40	Trust No. OWR	Same land history; refiled alone	24.4%	75%	75%	0%	Route c2, only if DAB = urban service area; 50% without North	Oct. 14 · by Nov. 13 · Dec. 13 (if received Sept. 14)
2026-16 King	36.626	King family trust	None found; active cropland	70.4%	0.3%	0.3%	0%	No route: no residential designation on any side	Oct. 21 · by Nov. 20 · Dec. 20 (if received Sept. 21)

Percentages are the share of the site's perimeter; thresholds are 75 percent for route c1a and 50 percent for each half of route c2. Adler Creek and Star IV are shown for the Windcrest parcels and the parent parcel respectively, because the filed boundaries are not public. Sources 4, 22-24.

For commissioners and staff: each filing has a printable one-page briefing (map, statutory checklist, dates, sources): [10](#) · [11](#) · [12](#) · [13](#) · [14](#) · [15](#) · [16](#).

What this report is not. It is not a verdict on any application and takes no position on whether the sites should be developed. The County has not ruled; the applicants' exhibits and the staff reports are not yet public; and the numbers here are a reproducible estimate from public GIS layers, not a survey. Where the record cuts for an applicant, we say so.

THE LAW

What a site must show

Chapter 2026-34 lets the owner of an "agricultural enclave" have the land certified and then build single-family housing at the density of an adjacent parcel or development, as a conforming use, without a plan amendment or rezoning. The definition in s. 163.3164(4) is tested **as of January 1, 2025**: the parcels must be unincorporated and undeveloped, owned or controlled by a single person or entity, in bona fide agricultural use for five years, within the acreage caps, served or servable by public facilities, and surrounded by enough qualifying land on their perimeter. Where a road, water body or canal lies on the perimeter, the parcels across it are used. ^{1 2}

Route c1a • 75%

At least 75 percent of the perimeter is parcels with *existing* industrial, commercial or residential development.

Route c1b • 75%

At least 75 percent is parcels designated on *both* the zoning map and the FLUM for those uses, and at least half of that land is already built.

Route c1c • 75%

A combination of an interstate highway and parcels inside an urban service district, area or line that are designated on the FLUM. None of the seven sites adjoins an interstate.

Route c2 • 50% + 50%

The site is 700 acres or less; at least 50 percent of the perimeter is designated on the FLUM for those uses; and at least 50 percent is within an *urban service district, area or line*.

Route c3

The site is inside an adopted rural study area intended for residential use. None has been identified for these sites.

Certification also requires that an adjacent parcel or development already permits the proposed density, and an applicant may not count the perimeter of another parcel that has already been certified as an enclave. The County must deliver a written compliance report within 30 days of receipt, hold a hearing within 30 days of the report, and if it neither approves nor denies within 90 days of receipt, the land **must be certified**. A denial needs written findings and can be reviewed by the circuit court.³

THE PIVOT

Is the Development Area Boundary an "urban service area"?

Carter Road, Pacetti Oaks and both Osceola Lakes filings can reach the perimeter test only through route c2, and only if the answer is yes. Adler Creek, Star IV and King fall short on our screen either way.

The statute defines an urban service area as "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."² St. Johns County's plan draws a Development Area Boundary; its Policy A.1.2.7 says Development Areas "depict the overall future growth pattern of the County," and Policy A.1.2.9 says the County "shall investigate the designation of an Urban Service Area."⁵ The County's own GIS maps two polygons named Urban Service Area, both in the Durbin Creek area, totaling about 1,640 acres; none of the seven sites is near them.²³

Staff's reading, August 2026

"...the Development Area Boundary identifies the areas where urban public facilities and services are provided or planned. Accordingly, staff finds the Development Area Boundary satisfies the statutory definition of an urban service area..."

Agricultural Enclave Certification Report, Heritage Development East, p. 7.⁶ On this reading, Carter Road, Pacetti Oaks and Osceola North reach route c2 comfortably and Osceola South reaches it at 75 percent.

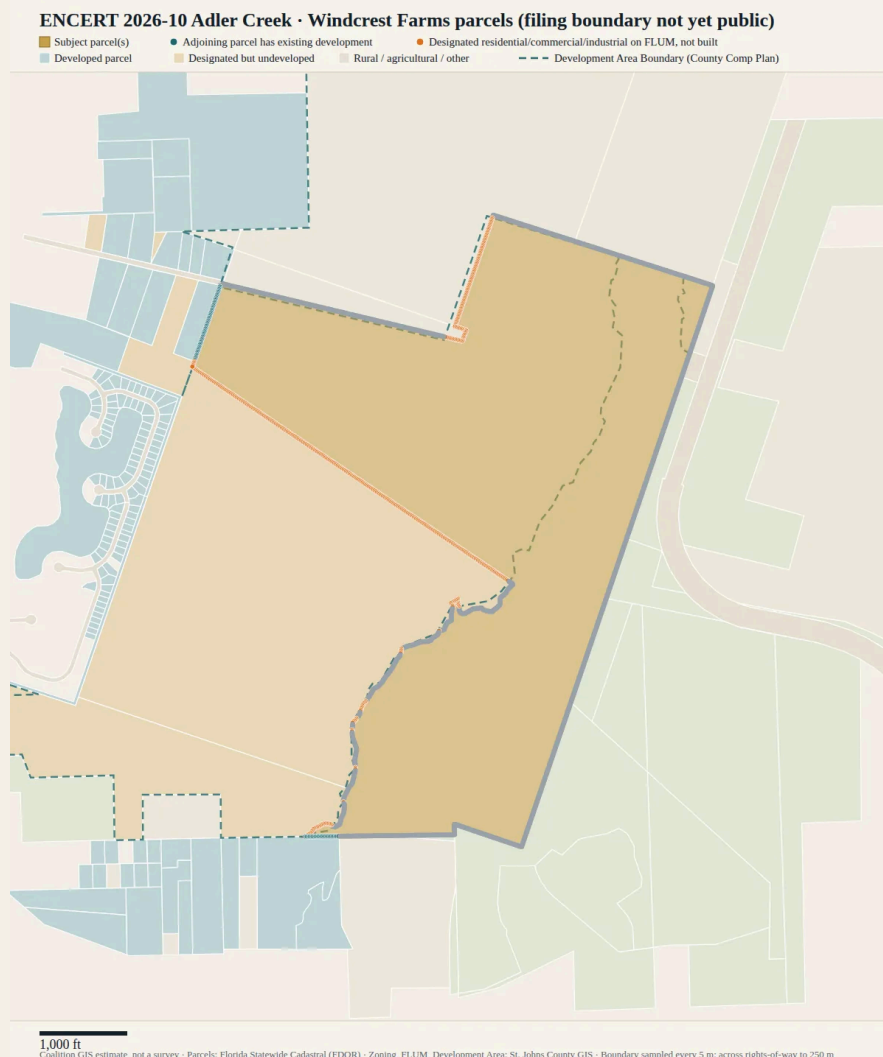
The Board's reading, September 28, 2026

A 3-2 majority reversed its August approvals of Heritage East and West; the stated ground, as reported, was that the Development Area Boundary is not an urban service area under the state definition, which requires facilities in place or in the capital improvements element. Heritage petitioned the circuit court on September 23 to block the reconsideration, and the County has voted to pursue a legal challenge to the law.⁸ On this reading, none of the four reaches route c2 on our screen.

The Coalition's position. We report both readings and adopt neither. The question is now before the court in the Heritage matter and will be answered in the County's written reports on these filings. What we can say is arithmetic: on every one of the four sites, the share of perimeter inside the Development Area Boundary is 75 to 100 percent, and the share inside a mapped Urban Service Area is zero. The definition the County applies could decide the perimeter test for all four. It would not settle the rest: control on January 1, 2025, five years of agricultural use, the "undeveloped" test and density are separate requirements, still open for each.

Adler Creek

ENCERT 2026-10 · 594.42 acres · east of Pacetti Road, west of the future CR 2209



Windcrest Farms parcels (456.9 acres). The filed 594.42-acre boundary is not public. Scenario only; filed boundary not reviewed. This is one of two alternative boundaries the Coalition tested. Coalition GIS estimate, not a survey. Open full size.

On the record

Filed	Sept. 1, 2026 (fee paid same day)
Owner / agent	Windcrest Farms LLC / Casey Dendor, AICP
County calendar	Report due Oct. 1 · hearing by Oct. 31 (tentatively Oct. 20) · 90-day default Nov. 30
Density	None requested; staff cites the 1,682-unit cap in Ordinance 2021-87

FLUM / zoning	Residential-C (with Conservation, Park and R/S on the roll parcels) / Open Rural, PUD portions
Tax roll	Three Windcrest parcels, about 460 ac, bought May 2025 for \$6.63 million; adjoining 282 ac still listed to Pacetti Investment Group LLC et al.

Portal, tax roll and County GIS as of Oct. 1, 2026. [4](#) [22](#) [23](#)

History the filing sits on

This is the second enclave filing on the land. **ENCERT 2026-03** (about 610 acres, owner Pacetti Investment Group, LLC et al.) was filed July 1 and withdrawn August 10, nine days before its hearing. Before that, **Ordinance 2021-87** (December 7, 2021) moved about 733 acres from Rural/Silviculture and Parks to Residential-C (596.83 + 4.41 acres) and Conservation (131.04 acres), with a text policy capping the Adler Creek Property at 1,682 homes and no non-residential use. The companion rezoning, **PUD 2021-21** for those 1,682 homes, was denied by the Board on September 20, 2022; the press reported a 4-0 vote and the developer's offers of a 100-acre high-school site and construction of CR 2209. The new filing's 594.42 acres is within about 2.4 acres of the Residential-C area in the ordinance. [9](#) [10](#) [11](#)

What it turns on

The boundary and the date. Windcrest is shown owning about 460 acres, less than the 594 filed, so the filing either includes Pacetti Investment Group land or the roll is behind the deeds. The statute asks who owned or controlled the parcels on **January 1, 2025**, before either 2025 transfer; the deeds and any contracts of that date answer it, not the current owner's name.

The perimeter. Neither scenario comes near 75 percent on routes c1a or c1b or 50 percent on both halves of route c2, and the larger one exceeds 700 acres. A boundary drawn along the Residential-C line would put the owner's own conservation land and the Pacetti remainder on the outside, which changes the arithmetic; it cannot be screened until the map is produced.

Coalition perimeter screen

Scenario: Windcrest parcels only · 456.9 ac

Route c1a · existing development **4.9%**



Route c1b · designated on zoning map and FLUM **5.9%**
also needs half of that land built



Route c2 · designated on FLUM **30.6%**



Route c2 · inside the Development Area Boundary **30.7%**



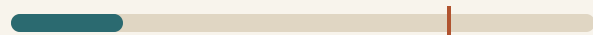
counts only if the DAB is an "urban service area" — disputed

Route c2 · inside a mapped Urban Service Area **0%**

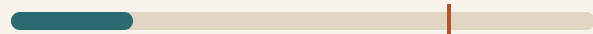


Scenario: all four parcels · 739.3 ac (over the 700-acre c2 limit)

Route c1a · existing development **19.2%**



Route c1b · designated on zoning map and FLUM **20.9%**



also needs half of that land built

Route c2 · designated on FLUM **40.1%**



Route c2 · inside the Development Area Boundary **40.3%**



counts only if the DAB is an "urban service area" — disputed

Route c2 · inside a mapped Urban Service Area **0%**



0.1% of this scenario's perimeter is unclassified where the scenario boundary cuts the parent parcel.

Thresholds: 75 percent for routes c1a and c1b; 50 percent for each half of route c2. Bars are the Coalition's estimate from the state parcel layer and County zoning, FLUM and boundary layers; the applicant's exhibit and the County's calculation may differ. How the screen works.

[Print the one-page briefing for ENCERT 2026-10 \(PDF\)](#)

Map, statutory checklist,

dates and sources on one sheet, for commissioners and staff.

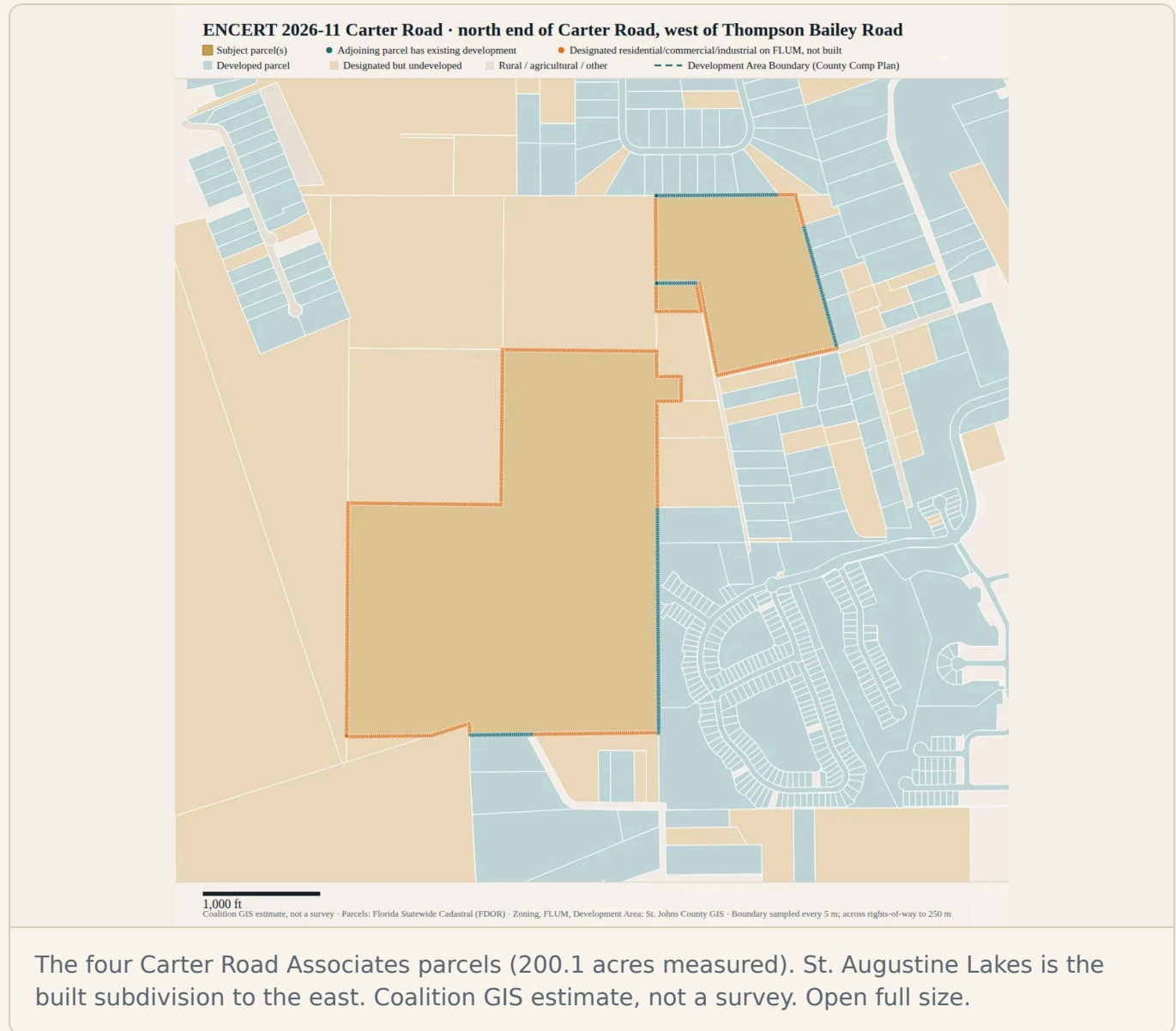
Open questions

- Exhibit A boundary and legal description
- Ownership and control on January 1, 2025 across the Windcrest and Pacetti Investment Group parcels
- Five years of bona fide agricultural use on the whole 594 acres
- The route claimed and the applicant's own perimeter arithmetic
- The County report emailed to the applicant October 1, not yet public

Every finding for this filing, keyed to the Coalition's 30 review questions, is in the research center inventory (E10 series).

Carter Road

ENCERT 2026-11 · 200.75 acres · north end of Carter Road, west of Thompson Bailey Road



On the record

Filed	Sept. 1, 2026 (fee received same day)
Owner / applicant	Carter Road Associates LLLP / Christen Spake, Esq.
County calendar	Report due Oct. 1; portal records it emailed to the applicant Oct. 1, 4:57 p.m. (not posted publicly as of Oct. 2) · hearing within 30 days of the report · 90-day default Nov. 30

Density	None requested; staff note: statutory maximum 13 units per acre (basis not stated)
FLUM / zoning	Residential-B and Residential-C / Open Rural, PUD on two parcels
Tax roll	Four parcels, 200.82 ac, timberland classification, no buildings, no recent sale

Portal, tax roll and County GIS as of Oct. 1, 2026. **4 22 23**

History the filing sits on

PUD 2023-14, The Preserve at St. Augustine Lakes, sought to rezone about 247 acres (Carter Road Associates and Mary Ann Lewis) for up to 376 single-family homes with access by Thompson Bailey Road. The Planning and Zoning Agency recommended approval 4-3 on May 16, 2024; the Board **denied it 5-0 on September 17, 2024** after residents raised drainage, traffic and compatibility, and the Chair described the land as wet. The County's review notes recorded **99.65 acres of wetland conservation** and 118.48 acres of total natural areas within the 247 acres. The enclave filing is about 46 acres smaller and omits the Lewis land. **12 13 14**

What it turns on

A threshold question, not the whole test. Routes c1a (25.8%) and c1b (9.5%) are far short of 75 percent because most of the neighbors are undeveloped timber land zoned Open Rural. Route c2 is reached on the FLUM half at 100 percent; its urban-service half is 100 percent only if the County's Development Area Boundary is an "urban service area," and 0 percent on the County's mapped Urban Service Areas. Whichever reading governs decides this filing.

Whose parcels. About 30 percent of the perimeter is other land of Carter Road Associates left out of the filing. The statute does not expressly bar counting an owner's own excluded land as surrounding "parcels," but the question of what the owner designated as the unit is live.

Coalition perimeter screen

Four tax parcels · 200.1 ac

Route c1a · existing development **25.8%**



Route c1b · designated on zoning map and FLUM **9.5%**



also needs half of that land built

Route c2 · designated on FLUM **100%**



Route c2 · inside the Development Area Boundary **100%**



counts only if the DAB is an "urban service area" — disputed

Route c2 · inside a mapped Urban Service Area **0%**



Thresholds: 75 percent for routes c1a and c1b; 50 percent for each half of route c2. Bars are the Coalition's estimate from the state parcel layer and County zoning, FLUM and boundary layers; the applicant's exhibit and the County's calculation may differ. How the screen works.

Print the one-page briefing for ENCERT 2026-11 (PDF)

Map, statutory checklist,

dates and sources on one sheet, for commissioners and staff.

Open questions

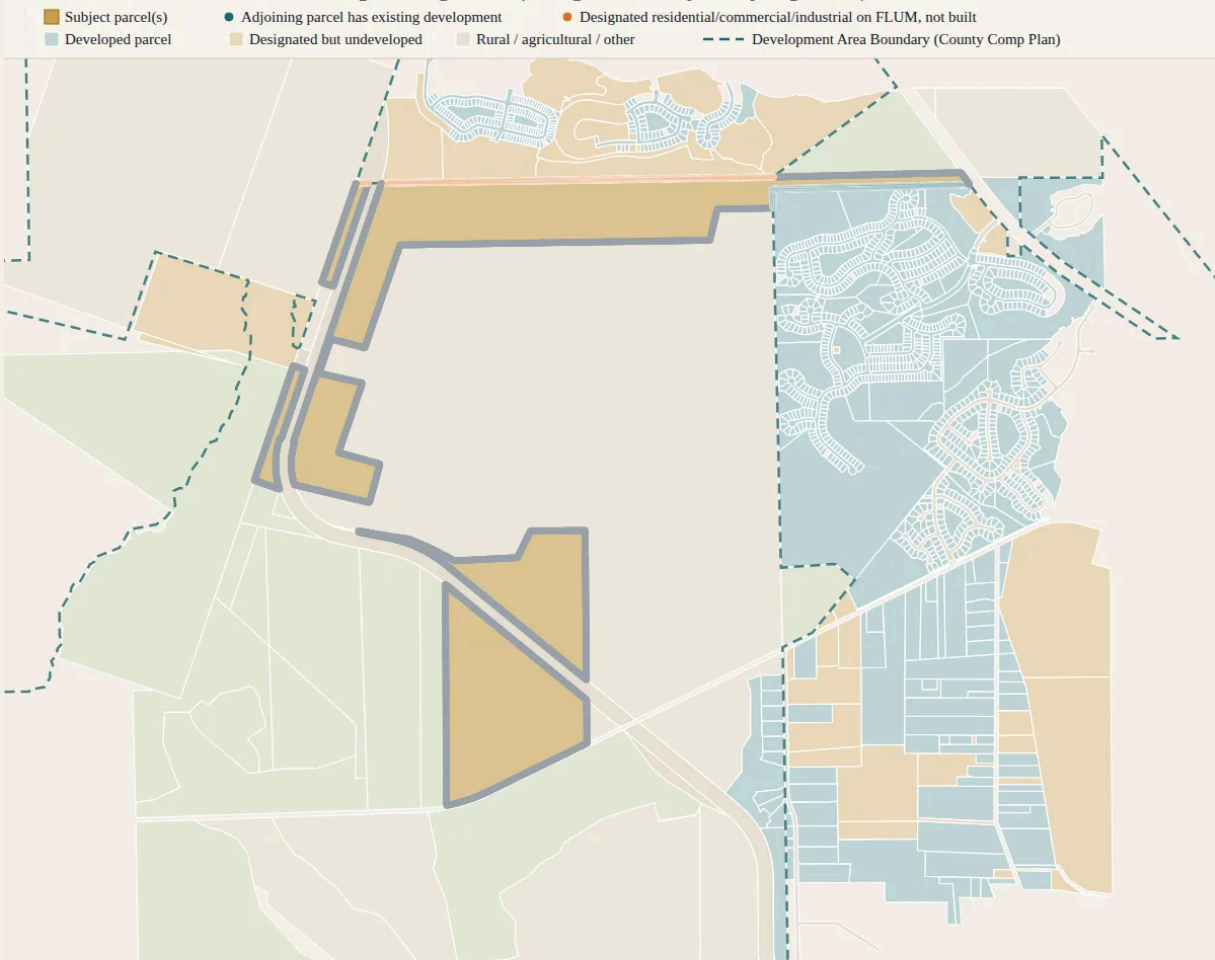
- The route claimed and the applicant's perimeter exhibit
- Whether excluded land of the same owner may be counted as surrounding parcels
- Five-year agricultural use on the timber parcels
- The adjacent comparator behind the 13-unit note
- The staff report due October 1

Every finding for this filing, keyed to the Coalition's 30 review questions, is in the research center inventory (E11 series).

Star IV

ENCERT 2026-12 · 70.83 acres · west of State Road 16, between Grand Oaks and Windward Ranch

ENCERT 2026-12 Star IV · parent parcel (filing boundary not yet public)



1,000 ft

Coalition GIS estimate, not a survey · Parcels: Florida Statewide Cadastral (FDOR) · Zoning, FLUM, Development Area: St. Johns County GIS · Boundary sampled every 5 m; across rights-of-way to 250 m

The owner's 412-acre parent parcel (4000 County Road 208). The filed 70.83-acre boundary is not public. Scenario only; filed boundary not reviewed. Coalition GIS estimate, not a survey. Open full size.

On the record

Filed	Sept. 1, 2026
Owner / agent	Star Investors IV Limited LLLP / Casey Dendor, AICP
County calendar	Letter due Oct. 1 · hearing within 30 days of the report · 90-day default Nov. 30
Density	None requested; staff note: statutory maximum 6 units per acre

FLUM / zoning	Parent parcel: Residential-C, Conservation, Park/Recreation and Rural/Silviculture / Open Rural with a PUD portion; separate 28- acre SR 16 strip zoned PUD, Residential-C
Neighbors	Grand Oaks (PUD 2018- 40; 999 units entitled, 443 built), Encanta (PUD 2016-14; 580), Star 4 Mitigation LLC (34% of the parent perimeter)

Portal, tax roll and County GIS as of Oct. 1, 2026. ^{4 22 23}

History the filing sits on

ENCERT 2026-04 (about 176 acres, same owner and agent) was filed July 1, scheduled for August 19 and withdrawn August 7. The replacement is 60 percent smaller with the same location description. Withdrawal and refileing are lawful and prove nothing by themselves; a smaller unit does change acreage, perimeter, agricultural footprint and the January 1, 2025 configuration question all at once. ⁴

What it turns on

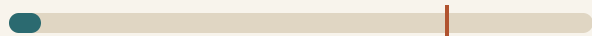
No scenario reaches a route. Grand Oaks and Encanta are built but touch only part of the edge; most of the surroundings are silviculture, mitigation and County land designated Rural/Silviculture, Conservation or Park. Even the most favorable boundary we could construct from the tax parcels tops out at 38 percent designated and under 10 percent built. The applicant's own boundary could be drawn differently and must be screened when it is public.

Protections stay. If any of the subject or the mitigation parcel is under a recorded conservation easement, the statute preserves that protection regardless of certification.

Coalition perimeter screen

Scenario: whole parent parcel · 413.2 ac

Route c1a · existing development **5.7%**



Route c1b · designated on zoning map and FLUM **16.4%**
also needs half of that land built



Route c2 · designated on FLUM **16.4%**



Route c2 · inside the Development Area Boundary **16.4%**
counts only if the DAB is an "urban service area" — disputed

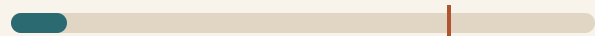


Route c2 · inside a mapped Urban Service Area **0%**



71-acre scenario: SR 16 strip + 43 ac

Route c1a · existing development **9.6%**



Route c1b · designated on zoning map and FLUM **38.1%**
also needs half of that land built



Route c2 · designated on FLUM **38.1%**



Route c2 · inside the Development Area Boundary **38.1%**
counts only if the DAB is an "urban service area" — disputed



Route c2 · inside a mapped Urban Service Area **0%**



14.9% of this scenario's perimeter is unclassified where the scenario boundary cuts the parent parcel.

Thresholds: 75 percent for routes c1a and c1b; 50 percent for each half of route c2. Bars are the Coalition's estimate from the state parcel layer and County zoning, FLUM and boundary layers; the applicant's exhibit and the County's calculation may differ. How the screen works.

Print the one-page briefing for ENCERT 2026-12 (PDF)

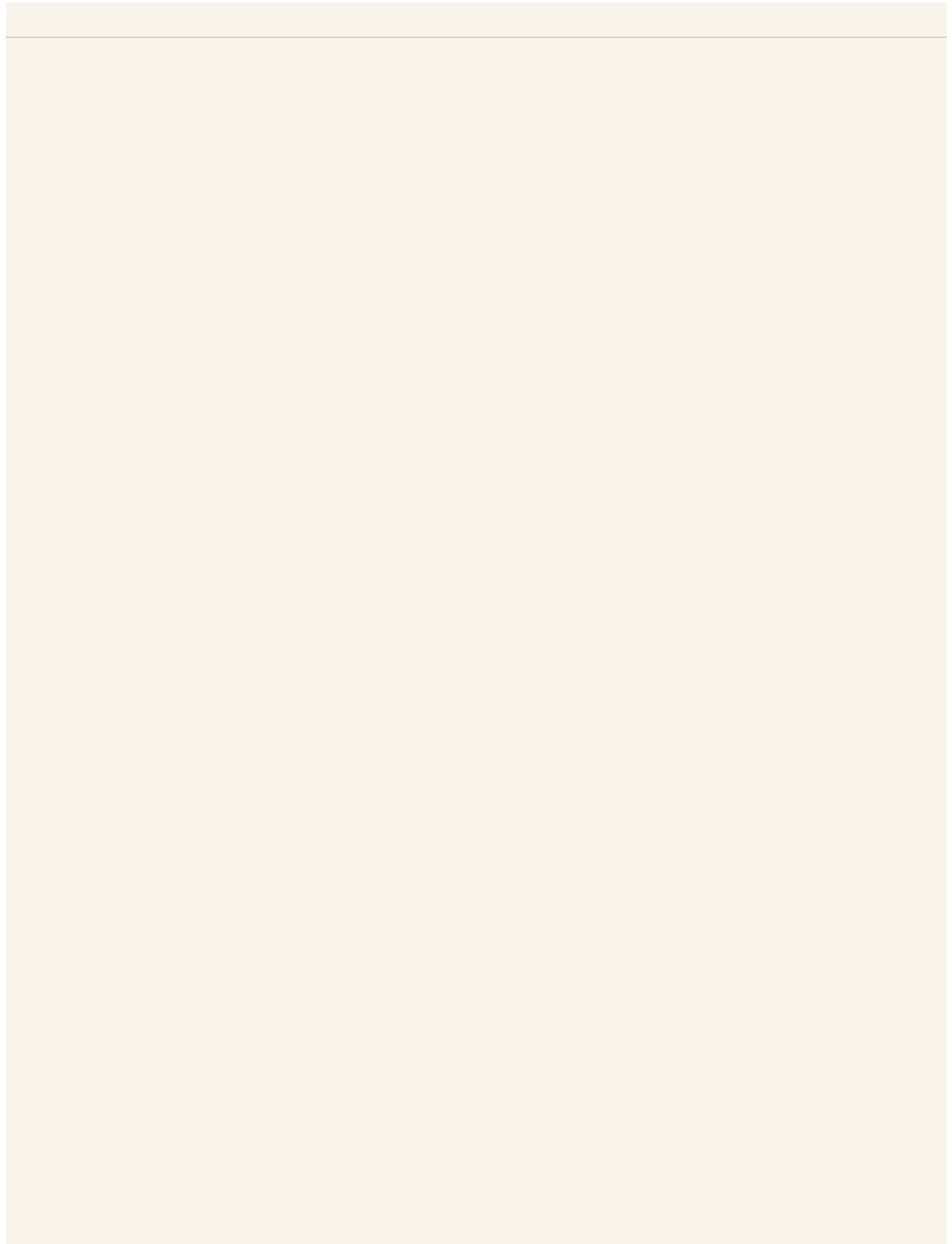
Map, statutory checklist,

dates and sources on one sheet, for commissioners and staff.

Open questions

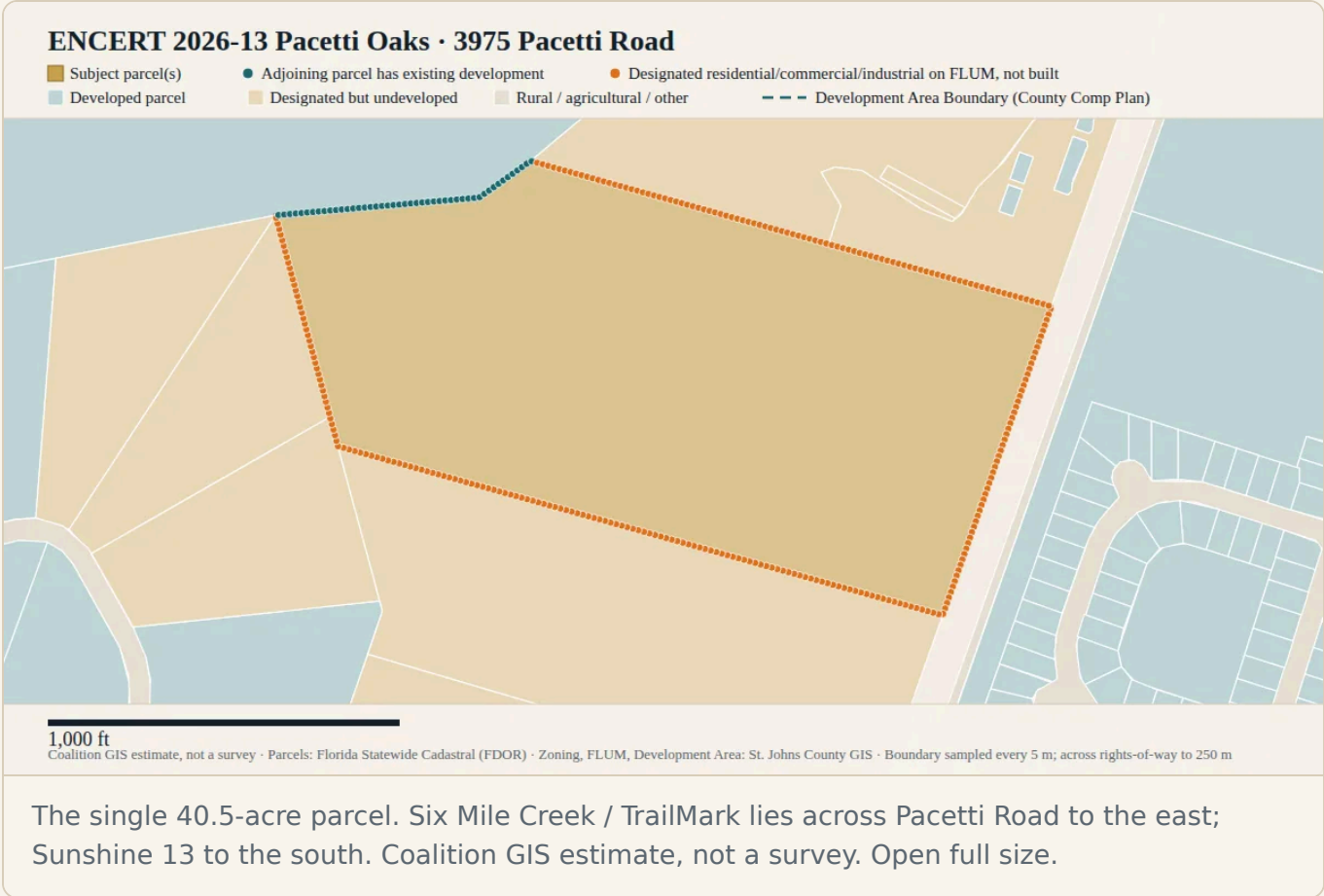
- Exhibit A boundary; whether the 28-acre PUD strip is included
- Conservation easements on the mitigation parcel or the subject
- Five-year silviculture history
- The staff report due October 1

Every finding for this filing, keyed to the Coalition's 30 review questions, is in the research center inventory (E12 series).



Pacetti Oaks

ENCERT 2026-13 · 40.5 acres · 3975 Pacetti Road, south of State Road 16



On the record

Filed Sept. 1, 2026

Owner / applicant James and Merriem Chapman Revocable Trust / Jason Gabriel

County calendar Report due Oct. 1 · hearing within 30 days of the report · 90-day default Nov. 30

Density "Not exceeding maximum allowable"; staff: 5 units per acre, citing Six Mile Creek North Phase 1 — about 200 homes on 40.5 acres

FLUM / zoning Residential-A (with St. Johns DRI) / Open Rural, PUD portion

Tax roll Grazing land with agricultural-use value; one 6,342 sq ft residence built 1997; nominal January 2025 transfer into the trust

Portal, tax roll and County GIS as of Oct. 1, 2026. ^{4 22 23}

History the filing sits on

In March 2022 the Chapmans filed **CPA(SS) 2022-05** (Residential-A to Residential-C) and **PUD 2022-07, Chapman Crossing**, for up to 216 townhomes on the same 40.5 acres. Neither was heard; the applicant twice deferred scheduling and both expired and were administratively closed on January 4, 2024. In April 2025 a third party requested a confirmation letter for the parcel, the parent record of this filing. ^{15 16 17}

What it turns on

A threshold question, not the whole test. Route c1a fails at 13.5 percent. Route c1b reaches 56.8 percent designated on both maps, short of 75 and also needing half of that land built. Route c2 is met on the FLUM half (100 percent); its urban-service half is 100 percent on the Development Area Boundary and 0 percent on mapped Urban Service Areas. The filing depends entirely on the urban-service question.

Two more elements. The definition requires an *undeveloped* parcel, and development under s. 380.04 includes building activity; how a 6,342-square-foot house fits that has not been decided in the County's enclave cases. And if the trust deed was recorded after January 1, 2025,

the owner on the statutory date was not the trust named in the application—almost certainly the same family, but the record must show it.

Coalition perimeter screen

Parcel 028790-1102 · 40.6 ac

Route c1a · existing development **13.5%**



Route c1b · designated on zoning map and FLUM **56.8%**



also needs half of that land built

Route c2 · designated on FLUM **100%**



Route c2 · inside the Development Area Boundary **100%**



counts only if the DAB is an "urban service area" — disputed

Route c2 · inside a mapped Urban Service Area **0%**



Thresholds: 75 percent for routes c1a and c1b; 50 percent for each half of route c2. Bars are the Coalition's estimate from the state parcel layer and County zoning, FLUM and boundary layers; the applicant's exhibit and the County's calculation may differ. How the screen works.

Print the one-page briefing for ENCERT 2026-13 (PDF)

Map, statutory checklist, dates and sources on one sheet, for commissioners and staff.

Open questions

- Deed date of the trust transfer
- Treatment of the 1997 residence under the undeveloped-land element
- Agricultural classification 2020 through 2025
- Whether Six Mile Creek North Phase 1 is adjacent for the density comparison
- The staff report due October 1

Every finding for this filing, keyed to the Coalition's 30 review questions, is in the research center inventory (E13 series).

Osceola Lakes North

ENCERT 2026-14 · 103 acres · south of Wildwood Drive, north of Watson Road, a mile west of US 1

Three parcels (103.9 acres measured). The Osceola Lakes South parcel is the square at the bottom; Secession and Wildwood-area subdivisions to the east. Coalition GIS estimate, not a survey. [Open full size.](#)

On the record

Filed Sept. 14, 2026 (routed without payment; fee date not posted)

Owner / applicant Geoffrey A. Young / Robert Walters

County calendar If receipt is Sept. 14: report due Oct. 14 · hearing by Nov. 13 · 90-day default Dec. 13

Density None posted; staff's note on the withdrawn July filing: 6 units per acre from adjacent Residential-C

FLUM / zoning Residential-B, Residential-C and Rural/Silviculture / Open Rural, PUD and RS-2 portions

Tax roll 40.22 ac (Young), 18.03 ac (Young), 45.04 ac listed to "Osceola Lakes LLC et al."; timberland; no buildings

Portal, tax roll and County GIS as of Oct. 1, 2026. [4](#) [22](#) [23](#)

History the filing sits on

REZ 2023-23 sought to rezone about 145 acres here for up to 640 single-family, duplex and townhouse units under the County's Workforce Housing district, with about 200 price-capped homes; the Board **denied it on September 3, 2024** with one vote in favor, the Chair citing infrastructure, school capacity, drainage and roads. **ENCERT 2026-02** (about 143 acres) was filed July 1, 2026, scheduled for August 19 and withdrawn August 11. On September 14 the land came back as two applications: this one and Osceola Lakes South. [18](#) [19](#) [21](#)

What it turns on

Many built neighbors, still short. At 52.8 percent, this is the highest existing-development share among the four filings that turn on the urban-service question (King measures 70.4 percent counting a subdivision common area and rural homes, about 45 percent counting only parcels with houses), drawn from the Secession and Wildwood-area subdivisions and from single homes on larger lots—including a parcel in Mr. Young's own name. It is below 75. Route c2 reaches 85.8 percent on the FLUM half; the urban-service half is 86.1 percent on the Development Area Boundary and 0 on mapped Urban Service Areas.

Three parcels, two names. One of the three parcels is held by Osceola Lakes LLC, which the application does not name.

Single ownership or control on January 1, 2025 must be shown across all three.

North and South count each other.

About 10 percent of this perimeter is the South parcel. The statute bars using the perimeter of a parcel *already certified* as an enclave; it does not bar counting an adjoining undeveloped parcel designated residential. Whichever is certified first cannot be counted by the other.

Coalition perimeter screen

Three tax parcels · 103.9 ac

Route c1a · existing development **52.8%**



Route c1b · designated on zoning map and FLUM **13%**



also needs half of that land built

Route c2 · designated on FLUM **85.8%**



Route c2 · inside the Development Area Boundary **86.1%**



counts only if the DAB is an "urban service area" — disputed

Route c2 · inside a mapped Urban Service Area **0%**



Thresholds: 75 percent for routes c1a and c1b; 50 percent for each half of route c2. Bars are the Coalition's estimate from the state parcel layer and County zoning, FLUM and boundary layers; the applicant's exhibit and the County's calculation may differ. How the screen works.

Print the one-page briefing for ENCERT 2026-14 (PDF)

Map, statutory checklist, dates and sources on one sheet, for commissioners and staff.

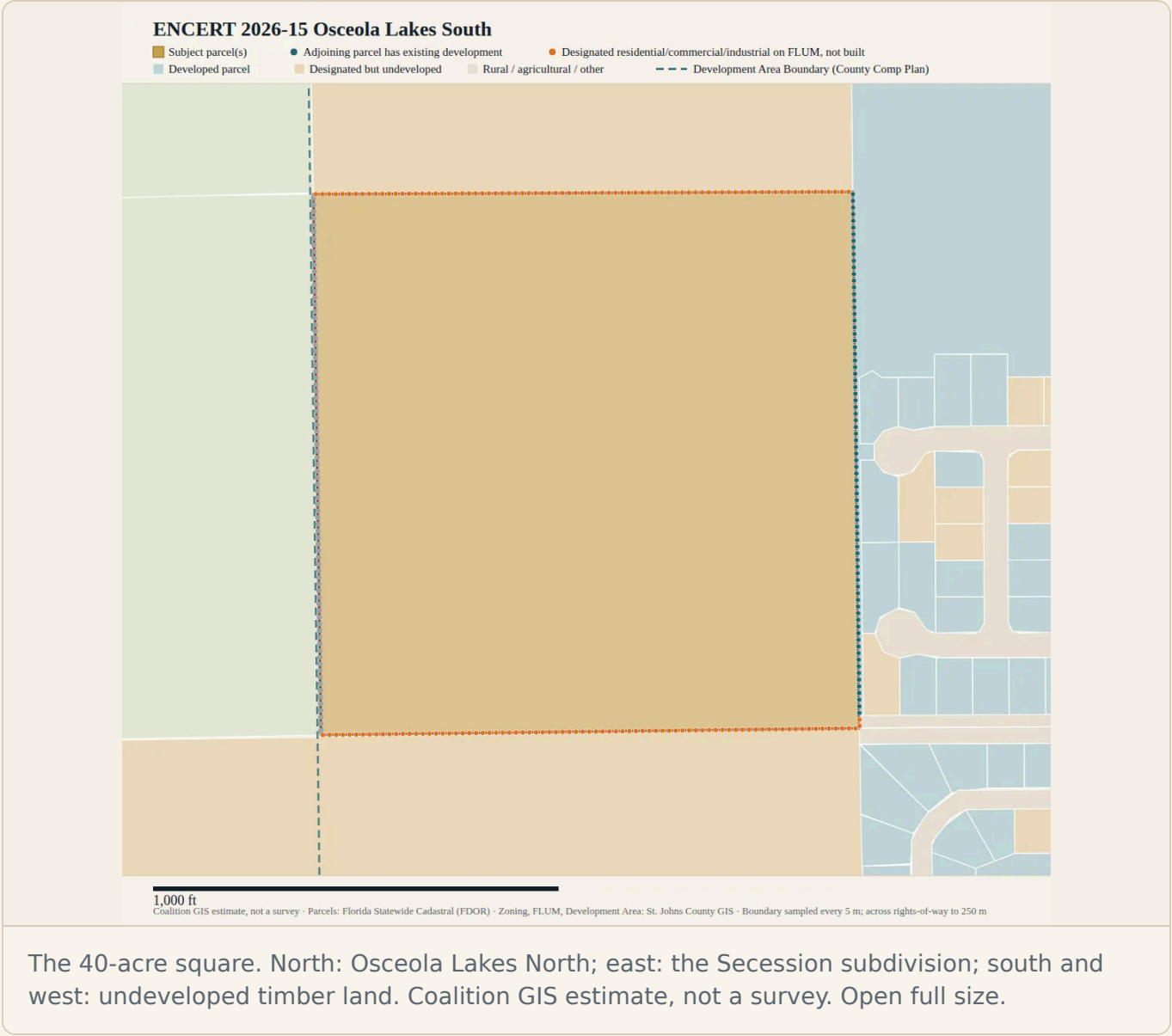
Open questions

- Fee-payment and receipt date
- The three deeds and the Osceola Lakes LLC relationship as of January 1, 2025
- Five-year agricultural use
- Route, density request and perimeter exhibit
- The County's report

Every finding for this filing, keyed to the Coalition's 30 review questions, is in the research center inventory (E14 series).

Osceola Lakes South

ENCERT 2026-15 · 40 acres · Watson Road



On the record

Filed	Sept. 14, 2026 (routed without payment; fee date not posted)
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Owner / applicant	Trust No. OWR dated May 4, 2022 / Robert Walters
--------------------------	--

County calendar	If receipt is Sept. 14: report due Oct. 14 · hearing by Nov. 13 · 90-day default Dec. 13
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Density	None posted
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FLUM / zoning	Residential-B and Rural/Silviculture / Open Rural, PUD portion (expired Rancho Del Mar PUD, 424 units entitled, none built, to the west)
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Tax roll	Timberland; no buildings; land trust owner since 2022
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Portal, tax roll and County GIS as of Oct. 1, 2026. [4](#) [22](#) [23](#)

History the filing sits on

Part of the 145-acre workforce-housing rezoning denied in September 2024 and of the 143-acre July 2026 filing withdrawn August 11; refiled alone on September 14 alongside Osceola Lakes North. The beneficiaries of the land trust are not shown in public records. [18](#) [21](#)

What it turns on

At the margin. Routes c1a (24.4%) and c1b (50%) are short of 75. Route c2 reaches 75 percent on the FLUM half and 75 percent on the Development Area half if the Development Area Boundary is an urban service area; take away the North side and both fall to **50 percent, the statutory minimum**, inside the tolerance of a screen like this one. Zero percent lies in a mapped Urban Service Area. The filing depends on the urban-service question and, at the edge, on whether North is decided first.

Coalition perimeter screen

Parcel 137090-0000 · 40.5 ac

Route c1a · existing development **24.4%**



Route c1b · designated on zoning map and FLUM **50%**



also needs half of that land built

Route c2 · designated on FLUM **75%**



Route c2 · inside the Development Area Boundary **75%**



counts only if the DAB is an "urban service area" — disputed

Route c2 · inside a mapped Urban Service Area **0%**



Thresholds: 75 percent for routes c1a and c1b; 50 percent for each half of route c2. Bars are the Coalition's estimate from the state parcel layer and County zoning, FLUM and boundary layers; the applicant's exhibit and the County's calculation may differ. How the screen works.

Print the one-page briefing for ENCERT 2026-15 (PDF)

Map, statutory checklist,

dates and sources on one sheet, for commissioners and staff.

Open questions

- Fee-payment and receipt date
- Trust ownership and control on January 1, 2025
- Five-year agricultural use
- Order of the County's decisions on North and South
- The County's report

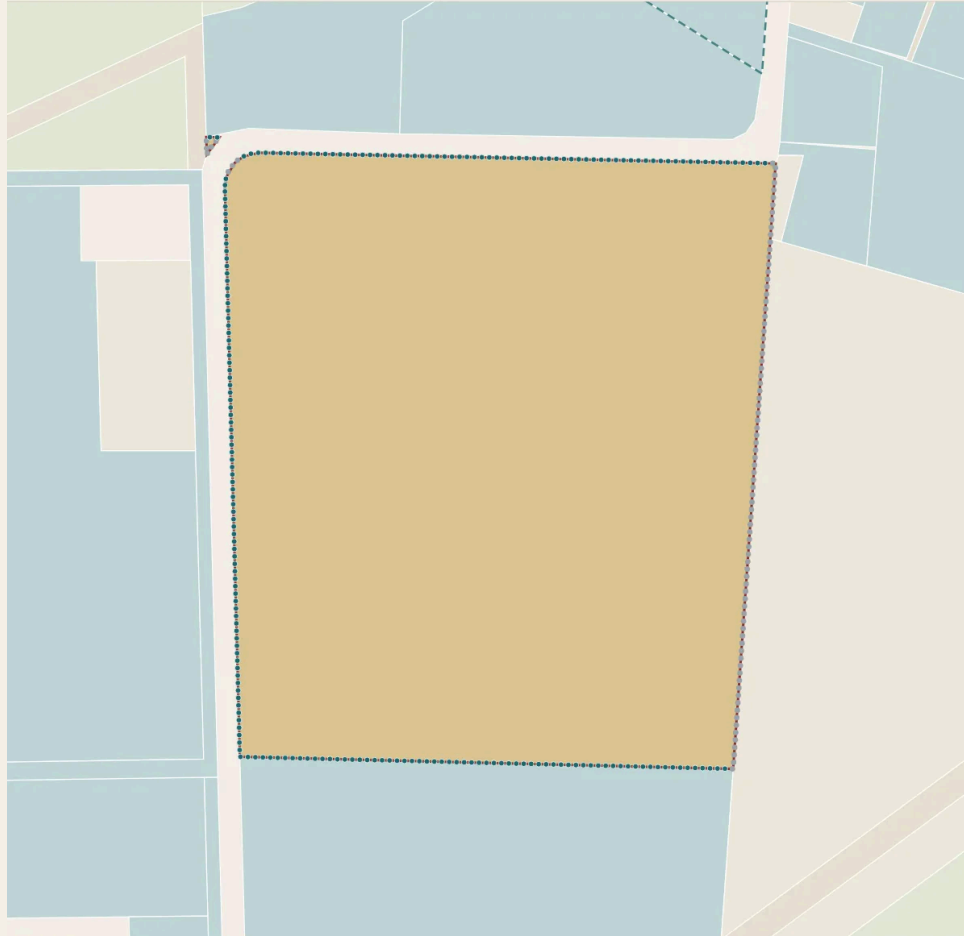
Every finding for this filing, keyed to the Coalition's 30 review questions, is in the research center inventory (E15 series).

King

ENCERT 2026-16 · 36.626 acres · 9400 Byrd Road, Hastings

ENCERT 2026-16 King · 9400 Byrd Road, Hastings

■ Subject parcel(s) ● Adjoining parcel has existing development ■ Designated residential/commercial/industrial on FLUM, not built
■ Developed parcel ■ Designated but undeveloped ■ Rural / agricultural / other - - - Development Area Boundary (County Comp Plan)



1,000 ft
Coalition GIS estimate, not a survey · Parcels: Florida Statewide Cadastral (FDOR) · Zoning, FLUM, Development Area: St. Johns County GIS · Boundary sampled every 5 m; across rights-of-way to 250 m

The King cropland parcel (35.2 acres measured). Nearly half the perimeter is measured across Byrd Road and a second road, as the statute directs. Coalition GIS estimate, not a survey. Open full size.

On the record

Filed Sept. 21, 2026 (routed without payment Sept. 22; fee date not posted)

Owner / applicant King Emory Revocable Living Trust (tax roll; portal owner field blank) / Angel King

County calendar If receipt is Sept. 21: report due Oct. 21 · hearing by Nov. 20 · 90-day default Dec. 20

Density One dwelling per acre requested; no layout proposed

FLUM / zoning Agriculture Intensive (not a Development Area under the Comp Plan) / Open Rural with a Residential General (RG-2) portion

Tax roll About 34 acres of cropland; no buildings; no recent sale

Portal, tax roll and County GIS as of Oct. 1, 2026. ^{4 22 23}

History the filing sits on

No prior development application was found on the portal. The parcel is active cropland in the Hastings agricultural district, which gives it the clearest agricultural and undeveloped profile of the seven. The filing's 36.626 acres against 34 on the roll likely reflects road right of way to the centerline, and should be reconciled because the perimeter is measured on the filed unit. ^{7 2}

What it turns on

The definition does not relax for small requests. Route c1a counts 70.4 percent only by crediting single homes on agricultural tracts (as staff did in the AFI case) and the common-element parcel of the Estes and Erwin subdivision; a strict count of parcels with dwellings is about 45 percent. Both are below 75. Routes c1b and c2 are not available because nothing adjoining is designated residential, commercial or industrial on the FLUM, and none of it is in a mapped Urban Service Area or the Development Area. Route c3 would need an adopted rural study area intended for residential use, which has not been identified. On this screen the filing does not meet the definition under any route, independent of the Development Area dispute.

What is different. This is the smallest, lowest-density request in the group, filed by the family that owns the land. The

County's ordinary rural subdivision and plan-amendment routes remain open to them regardless of certification; and the statute's density comparison would need an adjoining parcel permitting one unit per acre, where the surrounding designation allows one per twenty.

Coalition perimeter screen

Parcel 049530-0000 · 35.2 ac

Route c1a · existing development **70.4%**



Route c1b · designated on zoning map and FLUM **0%**



also needs half of that land built

Route c2 · designated on FLUM **0.3%**



Route c2 · inside the Development Area Boundary **0.3%**



counts only if the DAB is an "urban service area" — disputed

Route c2 · inside a mapped Urban Service Area **0%**



1.3% of this scenario's perimeter is unclassified where the scenario boundary cuts the parent parcel.

Thresholds: 75 percent for routes c1a and c1b; 50 percent for each half of route c2. Bars are the Coalition's estimate from the state parcel layer and County zoning, FLUM and boundary layers; the applicant's exhibit and the County's calculation may differ. How the screen works.

Print the one-page briefing for ENCERT 2026-16 (PDF)

Map, statutory checklist, dates and sources on one sheet, for commissioners and staff.

Open questions

- Fee-payment and receipt date
- Trustee authorization and control on January 1, 2025
- Five-year cropland use (likely, but to be shown)
- The route claimed; any rural study area
- The County's report

Every finding for this filing, keyed to the Coalition's 30 review questions, is in the research center inventory (E16 series).

CALENDAR

When the County must act

The County has counted the 30-day clock from the date the application fee was received. Fee dates for the three later September filings are not posted, so those rows are conditional on receipt matching the issue date. The first default date, November 30, covers the four filings received September 1: Adler Creek (594.42 acres), Carter Road (200.75), Star IV (70.83) and Pacetti Oaks (40.5), 906.5 acres in all. A default certification happens only if the County neither approves nor denies a filing in time; it is not a finding that the site qualifies. ^{3 4}

FILING	RECEIVED	REPORT DUE (30 DAYS)	HEARING (WITHIN 30 DAYS OF REPORT)	DEFAULT CERTIFICATION (90 DAYS)
2026-10 Adler Creek	Sept. 1	Oct. 1	By Oct. 31; tentatively Oct. 20	Nov. 30
2026-11 Carter Road	Sept. 1	Oct. 1	By Oct. 31	Nov. 30
2026-12 Star IV	Sept. 1	Oct. 1	By Oct. 31	Nov. 30
2026-13 Pacetti Oaks	Sept. 1	Oct. 1	By Oct. 31	Nov. 30
2026-14 Osceola Lakes North	Sept. 14 (fee date not posted)	Oct. 14	By Nov. 13	Dec. 13
2026-15 Osceola Lakes South	Sept. 14 (fee date not posted)	Oct. 14	By Nov. 13	Dec. 13
2026-16 King	Sept. 21 (fee date not posted)	Oct. 21	By Nov. 20	Dec. 20

Hearing packets—the staff report, the application and its exhibits—are posted with the Board agenda on the Clerk's site about a week before each meeting. The Coalition will update this report and the research inventory as each packet appears.

METHOD AND LIMITS

How the screen works

For each filing we took the subject tax parcels from the Florida Statewide Cadastral layer, merged them, and walked the boundary in 5-metre steps. At each step we looked outward—3 to 250 metres—for the first parcel that is not part of the subject, so that where a road, canal or water body lies on the edge the parcel across it is used, as the statute directs. Each step is then classified by that parcel: **existing development** if its Department of Revenue use code is residential, commercial or industrial (single homes on acreage count, as County staff counted them in the AFI case; vacant land does not); **designated** if the County's zoning layer and Future Land Use layer place it in a residential, commercial, industrial, PUD or DRI category; and **urban service** if it falls inside a polygon the County's Land Use Boundary layer names "Urban Service Area" or, separately, "Development Area."⁷
22 23 24

 Subject parcels  Developed parcel  Designated but undeveloped 
 Rural, agricultural or other  Boundary adjoins existing development
Boundary adjoins designated, unbuilt land

What it cannot do

It is not a survey, and the layers are current ones, not certified maps as of January 1, 2025. It cannot see the applicants' Exhibit A boundaries, which for Adler Creek and Star IV are not yet public, so those two are screened on alternative scenario boundaries. The scenarios do not necessarily bound the result for the boundary actually filed. It does not decide the legal questions—whether the Development Area Boundary is an urban service area, whether an owner's own excluded land counts, whether a parcel with a house is "undeveloped"—it only shows which questions matter and by how much. Percentages are rounded to one decimal; differences of a few points are within its tolerance, which is why Osceola South's 50 percent is reported as "at the minimum" rather than as a pass or a fail. The numbers behind every map are published as a data file so anyone can check them.

What we did not do

We did not assign pass or fail verdicts to applications the County has not ruled on, and we did not treat withdrawal, refiling or a smaller boundary as evidence of bad faith; each is lawful. We did not reach ownership, five-year agricultural use or public-services conclusions where the deeds, classification history and utility letters are not public. Public-records

requests for the full files were submitted October 1; the hearing packets will supersede this screen as they post.

SOURCES

Primary sources first

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3. Florida Statutes s. 163.3162(4) (2026), certification process: report within 30 days, hearing within 30 days, 90-day default, adjacent-density condition, no use of another certified enclave's perimeter. <https://www.flsenate.gov/Laws/Statutes/2026/163.3162>
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5. St. Johns County 2025 Comprehensive Plan, Land Use Element, Objective A.1.2 and Policies A.1.2.7, A.1.2.9; residential density table. <https://www.sjcfl.us/wp-content/uploads/2026/06/A-Land-Use-2025.pdf>
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<https://webapp.sjcfl.us/CSubmittalWeb/Record.aspx?ApplType=PUD&ApplNum=2023000014>
13. St. Johns County Board of County Commissioners agenda, Sept. 17, 2024, PUD 2023-14 item. <https://stjohnsclerk.com/minrec/agendas/2024/091724cd/091724arbcc.pdf>
14. Jacksonville Daily Record, "St. Johns County denies rezoning for residential development," Sept. 17, 2024. <https://www.jaxdailyrecord.com/news/2024/sep/17/st-johns-county-denies-rezoning-for-residential-development/>
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Press reports are cited for attributed statements and votes only; where a signed order or packet exists it is preferred. Corrections are welcome and will be published.

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This report is informational and is not legal advice. Facts are drawn from the public record as cited; the perimeter screen is a Coalition estimate, not a survey. Research current through October 1, 2026.

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