

ORDINANCE NO. 2020-42

AN ORDINANCE OF THE COUNTY OF ST. JOHNS, STATE OF FLORIDA, ESTABLISHING THE ENTRADA COMMUNITY DEVELOPMENT DISTRICT PURSUANT TO CHAPTER 190, FLORIDA STATUTES (2019); NAMING THE DISTRICT; DESCRIBING THE EXTERNAL BOUNDARIES OF THE DISTRICT; DESCRIBING THE FUNCTIONS AND POWERS OF THE DISTRICT; DESIGNATING FIVE PERSONS TO SERVE AS THE INITIAL MEMBERS OF THE DISTRICT'S BOARD OF SUPERVISORS; PROVIDING FOR A LIMITATION ON COUNTY OBLIGATIONS AND ACCEPTANCE; PROVIDING FOR A SEVERABILITY CLAUSE; AND PROVIDING AN EFFECTIVE DATE.

BE IT ORDAINED BY THE BOARD OF COUNTY COMMISSIONERS OF ST. JOHNS COUNTY, FLORIDA:

RECITALS

WHEREAS, D.R. Horton, Inc. – Jacksonville ("Petitioner"), having obtained written consent to the establishment of the District by the owner of 100 percent (100%) of the real property, described in attached Exhibit A, to be included in the District, petitioned the St. Johns County Board of Commissioners (the "County") to adopt an ordinance establishing the Entrada Community Development District (the "District"), with petition attached as Exhibit B, pursuant to Chapter 190, Florida Statutes (2019); and

WHEREAS, Petitioner is a Delaware corporation, authorized to conduct business in the State of Florida; and

WHEREAS, all interested persons and affected units of general-purpose local government were afforded an opportunity to present oral and written comments on the Petition at a duly noticed public hearing conducted by the County on September 1, 2020; and

WHEREAS, upon consideration of the record established at that hearing, the County determined: that the statements within the Petition were true and correct; that the establishment of the District is not inconsistent with any applicable element or portion of the state comprehensive plan or the local government comprehensive plan; that the land within the District is of sufficient size, is sufficiently compact and sufficiently contiguous to be developable as a functionally interrelated community; that the District is the best alternative available for delivering community development services and facilities to the area served by the District; that the services and facilities of the District will not be incompatible with the capacity and uses of existing local and regional community development services and facilities; and that the area to be served by the District is amenable to separate special district governance; and

WHEREAS, establishment of the District will constitute a timely, efficient, effective, responsive and economic way to deliver community development services in the area described in the Petition.

NOW, THEREFORE, BE IT ORDAINED BY THE BOARD OF COUNTY COMMISSIONERS OF ST. JOHNS COUNTY, FLORIDA, THAT:

SECTION 1. The above RECITALS are adopted as Findings of Fact in support of this Ordinance.

SECTION 2. AUTHORITY. This Ordinance is enacted in compliance with and pursuant to the Uniform Community Development District Act of 1980, Chapter 190, Florida Statutes (2019).

SECTION 3. DISTRICT NAME. There is hereby established a Community Development District situated entirely within the unincorporated limits of St. Johns County, Florida, which District shall be known as the "Entrada Community Development District".

SECTION 4. EXTERNAL BOUNDARIES OF THE DISTRICT. The external boundaries of the District are described in **Exhibit A** attached hereto and incorporated by reference. The proposed District covers approximately 143.98 acres of land. The site is generally located south of Lightsey Road, east of Interstate 95, and west of State Road 207, in unincorporated St. Johns County, Florida.

SECTION 5. EXPANSION OF DISTRICT WITH SUFFICIENTLY CONTIGUOUS LANDS. Pursuant to Section 190.046(1)(h), Florida Statutes, within ten (10) years of the effective date of this Ordinance, the District, or another petitioner, may petition the County for an amendment to expand the boundaries of the District to include the sufficiently contiguous lands identified in **Exhibit B**.

SECTION 6. FUNCTIONS AND POWERS. The general powers and functions of the District are described in Chapter 190, Florida Statutes (2019). The District is also authorized to exercise additional special powers to finance, fund, plan, establish, acquire, construct, reconstruct, enlarge or extend, equip, operate and maintain systems and facilities for parks and facilities for indoor and outdoor recreational, cultural, and educational uses, and security, including but not limited to guardhouses, fences and gates, electronic intrusion-detection systems, and patrol cars, as authorized and described in Section 190.012(2), Florida Statutes.

SECTION 7. BOARD OF SUPERVISORS. The five persons designated to serve as initial members of the District's Board of Supervisors are as follows: Robert S. Porter, Mark C. Dearing, Anthony Sharp, James Teagle, and John Gislason. All of the above-styled persons are residents of the State of Florida and citizens of the United States of America.

SECTION 8. LIMITATION ON COUNTY OBLIGATIONS AND ACCEPTANCE. Nothing in this Ordinance shall be deemed as affirmative acceptance by St. Johns County of any financial, operational, maintenance, or any other responsibilities of the District, nor be deemed as affirmative acceptance of any proposed improvement.

SECTION 9. SEVERABILITY. If any provision of this Ordinance or the application thereof is formally determined by a court of competent jurisdiction to be illegal, invalid or unenforceable, such

provisions shall be deemed to be severable and the remaining provisions shall continue in full force and effect provided that the illegal, invalid or unenforceable provision is not material to the logical and intended interpretation of this Ordinance.

SECTION 10. EFFECTIVE DATE. This Ordinance shall take effect pursuant to Florida general law.

PASSED AND ENACTED BY THE BOARD OF COUNTY COMMISSIONERS OF ST. JOHNS COUNTY, FLORIDA, THIS 1st DAY OF September, 2020.

BOARD OF COUNTY COMMISSIONERS
OF ST. JOHNS COUNTY

BY: [Signature]
Jeb S. Smith, Chair

SEP 03 2020
Rendition Date

ATTEST: Brandon J. Patty, CLERK OF THE
CIRCUIT COURT & COMPTROLLER

BY: [Signature]
Deputy Clerk

EFFECTIVE DATE: _____



EXHIBIT B

UPDATED PETITION TO ESTABLISH ENTRADA COMMUNITY DEVELOPMENT DISTRICT

Submitted By: Katie S. Buchanan

Florida Bar No. 14196

katieb@hgslaw.com

Michelle Rigoni

Florida Bar No. 0124758

micheller@hgslaw.com

119 South Monroe Street, Suite 300 (32301)

Post Office Box 6526

Tallahassee, Florida 32314

(850) 222-7500

(850) 224-8551 (fax)

Attorney for Petitioner

**BEFORE THE BOARD OF COUNTY COMMISSIONERS
ST. JOHNS COUNTY, FLORIDA**

**UPDATED PETITION TO ESTABLISH THE
ENTRADA COMMUNITY DEVELOPMENT DISTRICT**

Petitioner, D.R. Horton, Inc. – Jacksonville (“Petitioner”), hereby petitions the St. Johns County Board of County Commissioners pursuant to the “Uniform Community Development District Act of 1980,” Chapter 190, *Florida Statutes*, to establish a community development district (hereafter “District”) with respect to the land described herein. In support of this petition, Petitioner states:

1. Location and Size. The proposed District is located entirely within St. Johns County, Florida. **Exhibit 1** depicts the general location of the project. The proposed District covers approximately 143.98 acres of land. The site is generally located south of Lightsey Road, east of Interstate 95 and west of State Road 207. The metes and bounds description of the proposed external boundaries of the District is set forth in **Exhibit 2**.

2. Excluded Parcels. There are no parcels within the external boundaries of the proposed District which are to be excluded from the District.

3. Future Expansion Parcels. Pursuant to Section 190.046(1)(h), *Florida Statutes*, the **Exhibit 3** identifies certain “Expansion Parcels” that may be added to the boundaries of the district within 10 years after establishment. A general location map and a metes and bounds description of the proposed Expansion Parcels is set forth in **Composite Exhibit 4**.

4. Initial Board Members. The five persons designated to serve as initial members of the Board of Supervisors of the proposed District are as follows:

Name: Robert S. Porter
Address: 4220 Race Track Road
 St. Johns, Florida 32259

Name: Mark C. Dearing
Address: 4220 Race Track Road
St. Johns, Florida 32259

Name: Anthony Sharp
Address: 4220 Race Track Road
St. Johns, Florida 32259

Name: James Teagle
Address: 4220 Race Track Road
St. Johns, Florida 32259

Name: John Gislason
Address: 4220 Race Track Road
St. Johns, Florida 32259

All of the above-listed persons are residents of the state of Florida and citizens of the United States of America.

5. Name. The proposed name of the District is Entrada Community Development District.

6. Existing and Future Land Uses. The general distribution, location, and extent of the public and private existing and future land uses for the proposed District and Expansion Parcels, in accordance with the future land use plan element of the County's Future Land Use Plan, is identified in **Exhibit 5**. The proposed land uses for lands contained within the proposed District are consistent with the approved St. Johns County Future Land Use Plan.

7. Major Water and Wastewater Facilities. **Composite Exhibit 6** shows the existing and proposed major trunk water mains, sewer connections and drainage serving the lands within and around the proposed District.

8. District Facilities and Services. **Exhibit 7** describes the type of facilities Petitioner presently expects the proposed District to finance, fund, construct, acquire and/or install, as well as the anticipated entity responsible for ownership and maintenance. The

estimated costs of constructing the infrastructure serving land within the proposed District are identified in **Exhibit 8**. At present, these improvements are estimated to be made, acquired, constructed and/or installed from 2020 to 2021. Actual construction timetables and expenditures will likely vary, due in part to the effects of future changes in the economic conditions upon costs such as labor, services, materials, interest rates and market conditions. These estimates contemplate the exercise of the only two (2) special powers requested by the Petitioner at this time: (i) Section 190.012(2)(a), *Florida Statutes*, parks and facilities for indoor and outdoor recreational, cultural and educational uses; and (ii) Section 190.012(2)(d), *Florida Statutes*, security, including but not limited to guardhouses, fences and gates, electronic intrusion-detection systems, and patrol cars. Acceptance of any offer of dedication shall be at the sole discretion of the Board of County Commissioners. Nothing herein shall be construed as affirmative acceptance by the Board of County Commissioners of improvements or acceptance of any operating and maintenance obligations of the District.

9. Statement of Estimated Regulatory Costs. **Exhibit 9** is the statement of estimated regulatory costs (“SERC”) prepared in accordance with the requirements of Section 120.541, *Florida Statutes*. The SERC is based upon presently available data. The data and methodology used in preparing the SERC accompany it.

10. Landowner Consent. Petitioner has obtained written consent to establish the District from the owners of one hundred percent (100%) of the real property located within the boundaries of the proposed District, in accordance with Section 190.005, *Florida Statutes*. Documentation of this consent is contained in **Exhibit 10**. Pursuant to Section 190.046(1)(h), *Florida Statutes*, consent from the owners of the Expansion Parcels is not required until the District or landowner files a petition to amend the District boundaries to add one or more of the

Expansion Parcels. The inclusion of the Expansion Parcels in this Petition is not landowner consent.

11. Authorized Agent. The Petitioner is authorized to do business in Florida. **Exhibit 11** identifies the authorized agent for the Petitioner. Copies of all correspondence and official notices should be sent to:

Katie S. Buchanan (katieb@hgslaw.com)
HOPPING GREEN & SAMS, P.A.
P.O. Box 6526
Tallahassee, Florida 32314

12. This petition to establish the Entrada Community Development District should be granted because it meets the six (6) factors set forth in Section 190.005(1)(e), *Florida Statutes*. The factors, and evidence submitted in support of the same, are as follows:

a. The statements contained within this Petition have been found to be true and correct. Section 190.005(1)(e)1., *Florida Statutes*. In addition to the Exhibits attached hereto, following evidence has been submitted in support of this factor:

i. The Petitioner Representative has attested to the truthfulness and accuracy of the statements contained in this Petition and the attached Exhibits. See Pre-filed Testimony of Robert S. Porter, Petitioner Representative (“Porter Testimony”), paragraphs 8 through 19.

ii. The Project Engineer and Planner for the Petitioner (“Engineer”) has attested to the truthfulness and accuracy of certain Exhibits to the Petition. See Pre-filed Testimony of Vincent J. Dunn, Engineer and Planner (“Dunn Testimony”), paragraph 11.

b. Establishment of the District and all land uses and services planned within the proposed District are not inconsistent with applicable elements or portions of the effective State Comprehensive Plan or the St. Johns County Comprehensive Plan. Section 190.005(1)(e)2.,

Florida Statutes. In addition to the Exhibits attached hereto, following evidence has been submitted in support of this factor:

i. The Engineer has provided a comprehensive review of the applicable elements of the state and local comprehensive plans as it applies to the proposed District. See Dunn Testimony, paragraphs 25 through 39.

c. The area of land within the proposed District is of sufficient size, is sufficiently compact and is sufficiently contiguous to be developed as one functional interrelated community. Section 190.005(1)(e)3., *Florida Statutes*. In addition to the Exhibits attached hereto, following evidence has been submitted in support of this factor:

i. The District Management and Assessment Consultant of the Petitioner (“District Consultant”) has testified that the proposed District, as a part of a planned community, is of sufficient size, is sufficiently compact and is sufficiently contiguous to be developed as one functional interrelated community. See Pre-filed Testimony of Scott Brizendine, District Manager and Assessment Consultant (“Brizendine Testimony”), paragraphs 16 through 18.

ii. The Engineer has testified to the same. See Dunn Testimony, paragraphs 15 through 17.

d. The District is the best alternative available for delivering community development services and facilities to the area that will be served by the proposed District. Section 190.005(1)(e)4., *Florida Statutes*. In addition to the Exhibits attached hereto, following evidence has been submitted in support of this factor:

i. The establishment of the District will prevent the general body of taxpayers in St. Johns County from bearing the burden for installation of the infrastructure and the maintenance of certain facilities within the development encompassed by the District,

allowing for a more efficient use of resources. See Porter Testimony, paragraph 35. See also Brizendine Testimony, paragraphs 14 and 15.

ii. The establishment of the District would provide a long-term, stable, perpetual entity capable of funding, constructing and maintaining certain infrastructure improvements, better than other alternatives available, such as a property owners' or a homeowners' association. See Dunn Testimony, paragraphs 21 through 24.

e. The community development services and facilities of the District will not be incompatible with the capacity and use of existing local and regional community development services and facilities. Section 190.005(1)(e)5., *Florida Statutes*. In addition to the Exhibits attached hereto, following evidence has been submitted in support of this factor:

i. The propose infrastructure of the District currently do not exist for the area to be included in the District and no other entity or unit of government is presently funding or providing improvements proposed by the District; thus, there is no duplication or incompatibility. Brizendine Testimony, paragraphs 22 through 24. See also Dunn Testimony, paragraphs 18 and 19.

f. The area to be served by the proposed District is amenable to separate special-district government. Section 190.005(1)(e)6., *Florida Statutes*. In addition to the Exhibits attached hereto, following evidence has been submitted in support of this factor:

i. The area to be served by the District is of sufficient size to be able to support its own community development services and facilities proposed to be provided by the District. Brizendine Testimony, paragraphs 19 through 21. See also Dunn Testimony, paragraph 20.

WHEREFORE, Petitioner respectfully requests the County Commission of St. Johns County, Florida to:

a. hold a public hearing in accordance with the requirements of Section 190.005(2)(b), *Florida Statutes*, as scheduled for August 4, 2020;

b. grant the petition and adopt an ordinance establishing the District pursuant to Chapter 190, *Florida Statutes*;

c. consent to the District's exercise of certain additional powers to finance, fund, plan, establish, acquire, construct, reconstruct, enlarge or extend, equip, operate, and maintain systems and facilities for: (1) parks and facilities for indoor and outdoor recreational, cultural, and educational uses, as authorized and described; and (2) security, including but not limited to, guardhouses, fences and gates, electronic intrusion-detection systems, and patrol cars, both as authorized and described by Section 190.012(2), *Florida Statutes*; and

d. grant such other relief as appropriate.

[CONTINUED ON FOLLOWING PAGE]

RESPECTFULLY SUBMITTED, this 24^h day of April, 2020, as updated and supplemented on the 13th day of July, 2020.

HOPPING GREEN & SAMS, P.A.

BY: 
Katie S. Buchanan
Florida Bar No. 14196
katieb@hgslaw.com
Michelle Rigoni
Florida Bar No. 0124758
micheller@hgslaw.com
119 South Monroe Street, Suite 300 (32301)
Post Office Box 6526
Tallahassee, Florida 32314
(850) 222-7500
(850) 224-8551 (fax)
Attorney for Petitioner

EXHIBIT 1

ENTRADA COMMUNITY DEVELOPMENT DISTRICT

EXHIBIT 1

GENERAL LOCATION

April 7, 2020

LEGEND

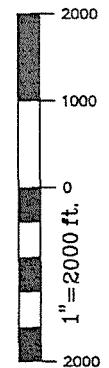
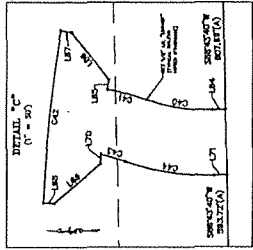
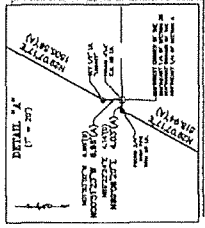
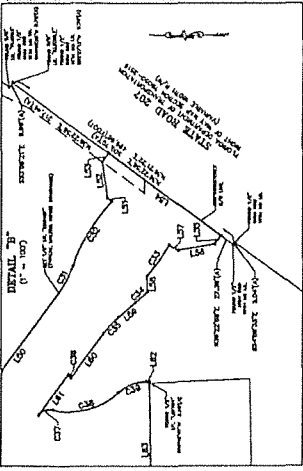


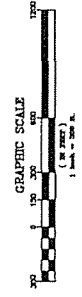
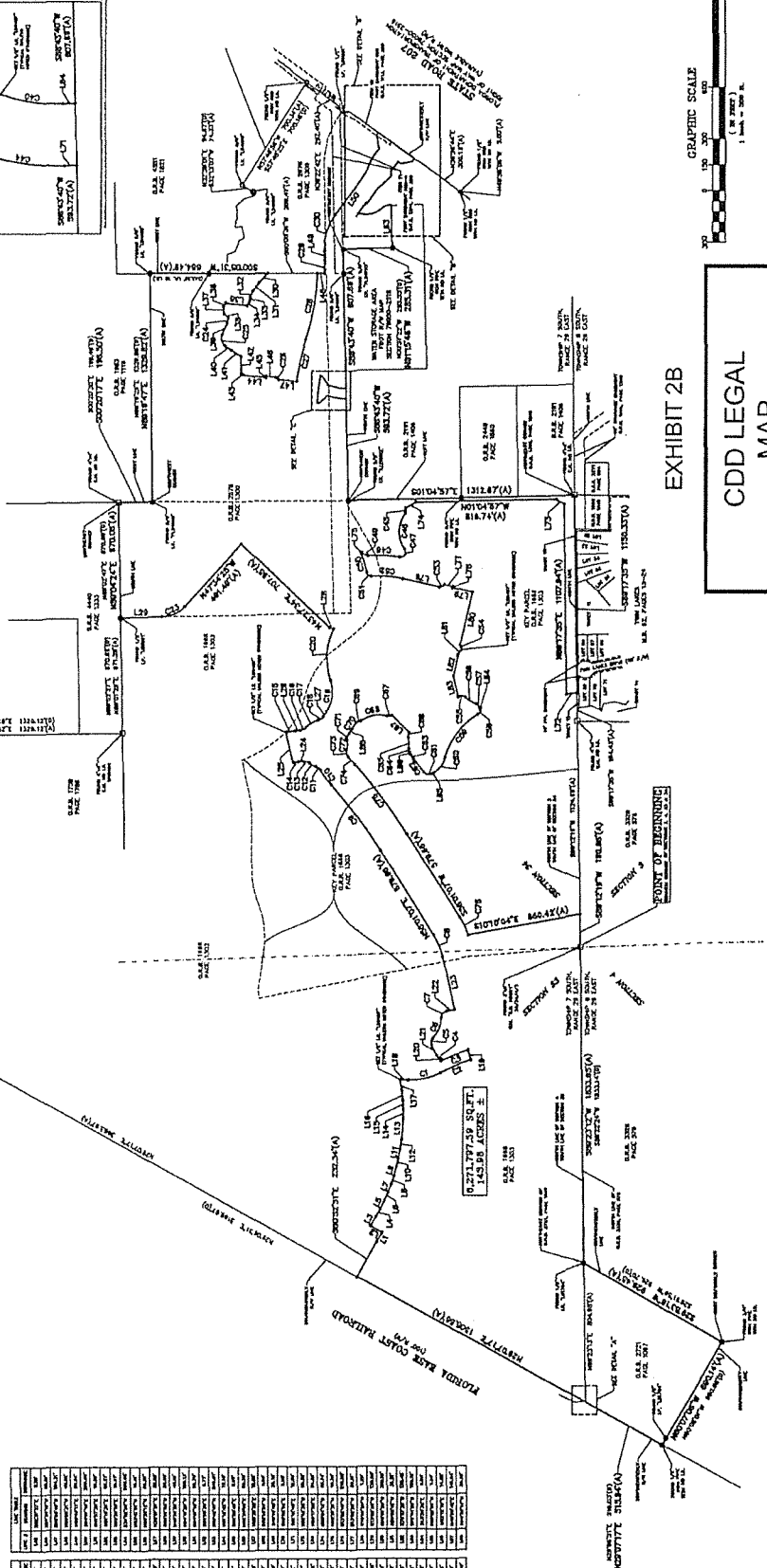
EXHIBIT 2



- LEGEND**
- 1 - BOUNDARY
 - 2 - DITCH
 - 3 - CROWN
 - 4 - CROWN
 - 5 - CROWN
 - 6 - CROWN
 - 7 - CROWN
 - 8 - CROWN
 - 9 - CROWN
 - 10 - CROWN
 - 11 - CROWN
 - 12 - CROWN
 - 13 - CROWN
 - 14 - CROWN
 - 15 - CROWN
 - 16 - CROWN
 - 17 - CROWN
 - 18 - CROWN
 - 19 - CROWN
 - 20 - CROWN
 - 21 - CROWN
 - 22 - CROWN
 - 23 - CROWN
 - 24 - CROWN
 - 25 - CROWN
 - 26 - CROWN
 - 27 - CROWN
 - 28 - CROWN
 - 29 - CROWN
 - 30 - CROWN
 - 31 - CROWN
 - 32 - CROWN
 - 33 - CROWN
 - 34 - CROWN
 - 35 - CROWN
 - 36 - CROWN
 - 37 - CROWN
 - 38 - CROWN
 - 39 - CROWN
 - 40 - CROWN
 - 41 - CROWN
 - 42 - CROWN
 - 43 - CROWN
 - 44 - CROWN
 - 45 - CROWN
 - 46 - CROWN
 - 47 - CROWN
 - 48 - CROWN
 - 49 - CROWN
 - 50 - CROWN
 - 51 - CROWN
 - 52 - CROWN
 - 53 - CROWN
 - 54 - CROWN
 - 55 - CROWN
 - 56 - CROWN
 - 57 - CROWN
 - 58 - CROWN
 - 59 - CROWN
 - 60 - CROWN
 - 61 - CROWN
 - 62 - CROWN
 - 63 - CROWN
 - 64 - CROWN
 - 65 - CROWN
 - 66 - CROWN
 - 67 - CROWN
 - 68 - CROWN
 - 69 - CROWN
 - 70 - CROWN
 - 71 - CROWN
 - 72 - CROWN
 - 73 - CROWN
 - 74 - CROWN
 - 75 - CROWN
 - 76 - CROWN
 - 77 - CROWN
 - 78 - CROWN
 - 79 - CROWN
 - 80 - CROWN
 - 81 - CROWN
 - 82 - CROWN
 - 83 - CROWN
 - 84 - CROWN
 - 85 - CROWN
 - 86 - CROWN
 - 87 - CROWN
 - 88 - CROWN
 - 89 - CROWN
 - 90 - CROWN
 - 91 - CROWN
 - 92 - CROWN
 - 93 - CROWN
 - 94 - CROWN
 - 95 - CROWN
 - 96 - CROWN
 - 97 - CROWN
 - 98 - CROWN
 - 99 - CROWN
 - 100 - CROWN

NO.	NAME	DATE	STATUS	REMARKS
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31
32
33
34
35
36
37
38
39
40
41
42
43
44
45
46
47
48
49
50
51
52
53
54
55
56
57
58
59
60
61
62
63
64
65
66
67
68
69
70
71
72
73
74
75
76
77
78
79
80
81
82
83
84
85
86
87
88
89
90
91
92
93
94
95
96
97
98
99
100

NO.	NAME	DATE	STATUS	REMARKS
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31
32
33
34
35
36
37
38
39
40
41
42
43
44
45
46
47
48
49
50
51
52
53
54
55
56
57
58
59
60
61
62
63
64
65
66
67
68
69
70
71
72
73
74
75
76
77
78
79
80
81
82
83
84
85
86
87
88
89
90
91
92
93
94
95
96
97
98
99
100



CDD LEGAL MAP

EXHIBIT 2B

April 7, 2020

EXHIBIT 3

EXHIBIT 3

FUTURE EXPANSION PARCELS

	<u>Parcel Identification Number</u>	<u>Acreage</u>	<u>Current Owner</u>
1	1013500000 (Portion)	49.15	St. Augustine Country Club LLC
2	1013700010, 1015300000 & 1014000000	18.86	Southeast Investments #17 LLC
3	1013500000 (Portion), 1013500020 & 1012800000	253.29	St. Augustine Country Club LLC
	1011800000, 1011800030 & 1029800000		Elmww LLC
	1013500010		Southeast Investments #17 LLC

EXHIBIT 4

ENTRADA COMMUNITY DEVELOPMENT DISTRICT

EXHIBIT 4A

PROJECT LAYOUT

April 7, 2020

DEVELOPMENT PHASING

CDD	=256 UNITS
FUTURE CDD	=765 UNITS
TOTAL	=1,021 UNITS

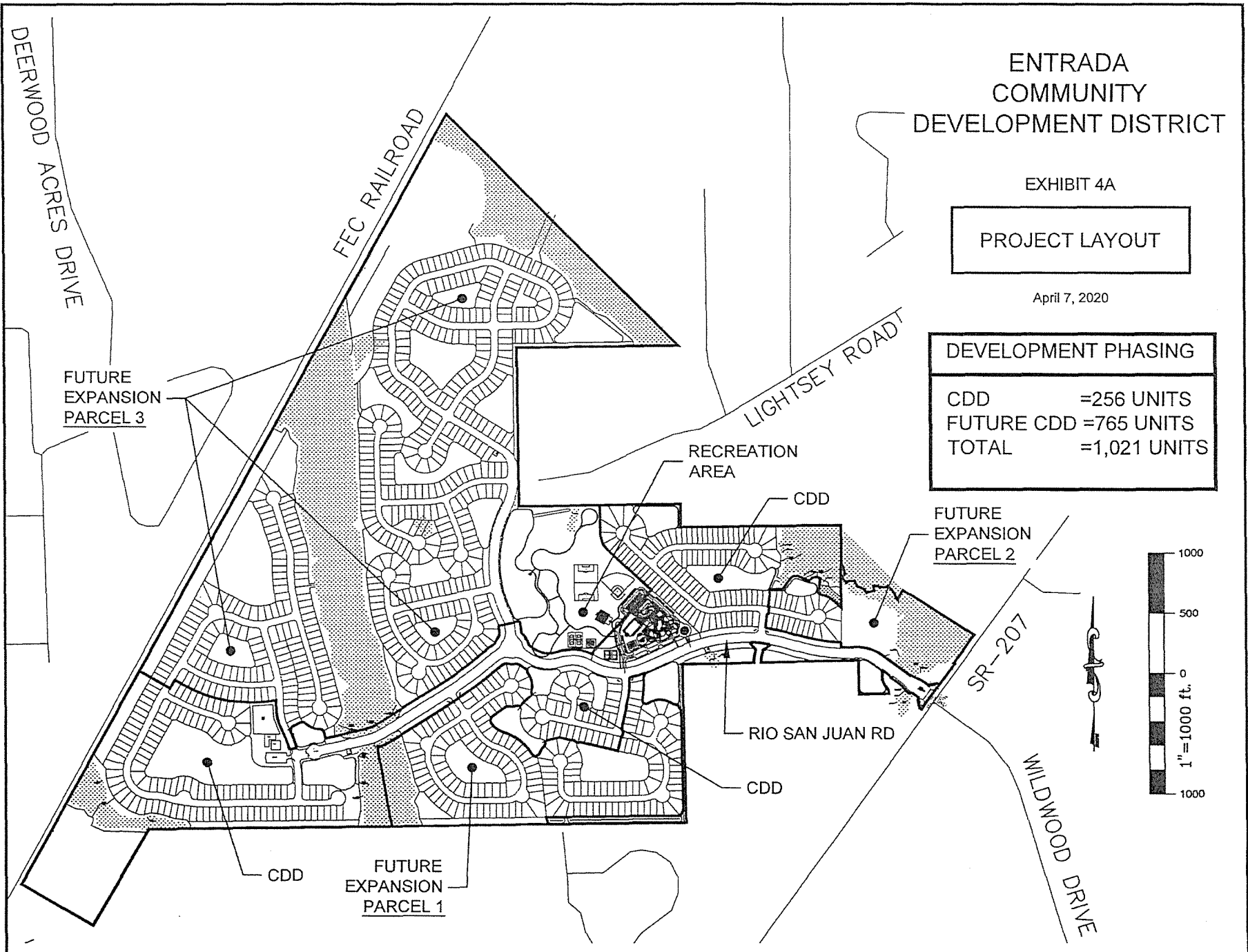


EXHIBIT 4B

FUTURE EXPANSION PARCEL 1

(SURVEYOR'S DESCRIPTION)

A PORTION OF SECTION 34, TOWNSHIP 7 SOUTH, RANGE 29 EAST, ST. JOHNS COUNTY, FLORIDA AND BEING MORE PARTICULARLY DESCRIBED AS FOLLOWS:

FOR A **POINT OF REFERENCE**, COMMENCE AT THE CORNER COMMON TO SECTION 3 AND SECTION 4, TOWNSHIP 8 SOUTH, RANGE 29 EAST AND SECTION 33 AND SECTION 34, TOWNSHIP 7 SOUTH, RANGE 29 EAST; THENCE NORTH 89°12'19" EAST, ALONG THE NORTH LINE OF SAID SECTION 3, ALSO BEING THE SOUTH LINE OF SAID SECTION 34, A DISTANCE OF 190.96 FEET TO THE **POINT OF BEGINNING**; THENCE NORTH 10°10'04" WEST, DEPARTING LAST SAID LINE, A DISTANCE OF 660.42 FEET TO THE BEGINNING OF A NON-TANGENT CURVE CONCAVE NORTHWESTERLY AND HAVING A RADIUS OF 590.00 FEET; THENCE NORTHEASTERLY ALONG THE ARC OF SAID CURVE, A DISTANCE OF 110.38 FEET, SAID CURVE BEING SUBTENDED BY A CHORD BEARING AND DISTANCE OF NORTH 63°22'42" EAST, 110.22 FEET TO THE POINT OF TANGENCY; THENCE NORTH 58°01'07" EAST, A DISTANCE OF 579.66 FEET TO THE POINT OF CURVATURE OF A CURVE CONCAVE NORTHWESTERLY AND HAVING A RADIUS OF 3090.00 FEET; THENCE NORTHEASTERLY ALONG THE ARC OF SAID CURVE, A DISTANCE OF 509.10 FEET, SAID CURVE BEING SUBTENDED BY A CHORD BEARING AND DISTANCE OF NORTH 53°17'55" EAST, 508.53 FEET TO THE POINT OF REVERSE CURVATURE OF A CURVE CONCAVE SOUTHEASTERLY AND HAVING A RADIUS OF 410.00 FEET; THENCE NORTHEASTERLY ALONG THE ARC OF SAID CURVE, A DISTANCE OF 57.35 FEET, SAID CURVE BEING SUBTENDED BY A CHORD BEARING AND DISTANCE OF NORTH 52°35'10" EAST, 57.31 FEET TO THE POINT OF COMPOUND CURVATURE OF A CURVATURE OF A CURVE CONCAVE SOUTHERLY AND HAVING A RADIUS OF 50.00 FEET; THENCE EASTERLY ALONG THE ARC OF SAID CURVE, A DISTANCE OF 41.37 FEET, SAID CURVE BEING SUBTENDED BY A CHORD BEARING AND DISTANCE OF NORTH 80°17'50" EAST, 40.20 FEET TO THE POINT OF REVERSE CURVATURE OF A CURVE CONCAVE NORTHERLY AND HAVING A RADIUS OF 140.00 FEET; THENCE EASTERLY ALONG THE ARC OF SAID CURVE, A DISTANCE OF 56.43 FEET, SAID CURVE BEING SUBTENDED BY A CHORD BEARING AND DISTANCE OF SOUTH 87°32'45" EAST, 56.04 FEET TO THE POINT OF REVERSE CURVATURE OF A CURVE CONCAVE SOUTHERLY AND HAVING A RADIUS OF 50.00 FEET; THENCE EASTERLY ALONG THE ARC OF SAID CURVE, A DISTANCE OF 37.12 FEET, SAID CURVE BEING SUBTENDED BY A CHORD BEARING AND DISTANCE OF SOUTH 77°49'25" EAST, 36.27 FEET TO THE POINT OF TANGENCY; THENCE SOUTH 56°33'19" EAST, A DISTANCE OF 35.82 FEET TO THE POINT OF CURVATURE OF A CURVE CONCAVE NORTHEASTERLY AND HAVING A RADIUS OF 390.00 FEET; THENCE SOUTHEASTERLY ALONG THE ARC OF SAID CURVE, A DISTANCE OF 42.90 FEET, SAID CURVE BEING SUBTENDED BY A CHORD BEARING AND DISTANCE OF SOUTH 59°42'24" EAST, 42.88 FEET TO THE END OF SAID CURVE AND THE BEGINNING OF A NON-TANGENT CURVE CONCAVE EASTERLY AND HAVING A RADIUS OF 38.00 FEET; THENCE SOUTHERLY ALONG THE ARC OF SAID CURVE, A DISTANCE OF 30.71 FEET, SAID CURVE BEING SUBTENDED BY A CHORD BEARING AND DISTANCE OF SOUTH 13°58'49" EAST, 29.88 FEET TO THE POINT OF REVERSE CURVATURE OF A CURVE CONCAVE WESTERLY AND HAVING A RADIUS OF 174.00 FEET; THENCE SOUTHERLY ALONG THE

ARC OF SAID CURVE, A DISTANCE OF 158.37 FEET, SAID CURVE BEING SUBTENDED BY A CHORD BEARING AND DISTANCE OF SOUTH 11°03'33" EAST, 152.96 FEET TO THE POINT OF REVERSE CURVATURE OF A CURVE CONCAVE EASTERLY AND HAVING A RADIUS OF 38.00 FEET; THENCE SOUTHERLY ALONG THE ARC OF SAID CURVE, A DISTANCE OF 29.37 FEET, SAID CURVE BEING SUBTENDED BY A CHORD BEARING AND DISTANCE OF SOUTH 07°07'29" EAST, 28.64 FEET TO THE END OF SAID CURVE; THENCE SOUTH 45°28'42" WEST, A DISTANCE OF 141.64 FEET TO THE BEGINNING OF A NON-TANGENT CURVE CONCAVE SOUTHERLY AND HAVING A RADIUS OF 38.00 FEET; THENCE WESTERLY ALONG THE ARC OF SAID CURVE, A DISTANCE OF 29.37 FEET, SAID CURVE BEING SUBTENDED BY A CHORD BEARING AND DISTANCE OF NORTH 81°55'08" WEST, 28.64 FEET TO THE POINT OF REVERSE CURVATURE OF A CURVE CONCAVE NORTHERLY AND HAVING A RADIUS OF 174.00 FEET; THENCE WESTERLY ALONG THE ARC OF SAID CURVE, A DISTANCE OF 65.68 FEET, SAID CURVE BEING SUBTENDED BY A CHORD BEARING AND DISTANCE OF SOUTH 86°45'19" WEST, 65.29 FEET TO THE POINT OF REVERSE CURVATURE OF A CURVE CONCAVE SOUTHERLY AND HAVING A RADIUS OF 38.00 FEET; THENCE WESTERLY ALONG THE ARC OF SAID CURVE, A DISTANCE OF 22.79 FEET, SAID CURVE BEING SUBTENDED BY A CHORD BEARING AND DISTANCE OF SOUTH 80°23'14" WEST, 22.45 FEET TO THE POINT OF TANGENCY; THENCE SOUTH 63°12'19" WEST, A DISTANCE OF 14.66 FEET TO THE POINT OF CURVATURE OF A CURVE CONCAVE SOUTHEASTERLY AND HAVING A RADIUS OF 163.00 FEET; THENCE SOUTHWESTERLY ALONG THE ARC OF SAID CURVE, A DISTANCE OF 31.60 FEET, SAID CURVE BEING SUBTENDED BY A CHORD BEARING AND DISTANCE OF SOUTH 57°39'04" WEST, 31.55 FEET TO THE POINT OF REVERSE CURVATURE OF A CURVE CONCAVE NORTHWESTERLY AND HAVING A RADIUS OF 3372.00 FEET; THENCE SOUTHWESTERLY ALONG THE ARC OF SAID CURVE, A DISTANCE OF 93.76 FEET, SAID CURVE BEING SUBTENDED BY A CHORD BEARING AND DISTANCE OF SOUTH 52°53'36" WEST, 93.76 FEET TO THE POINT OF REVERSE CURVATURE OF A CURVE CONCAVE EASTERLY AND HAVING A RADIUS OF 38.00 FEET; THENCE SOUTHERLY ALONG THE ARC OF SAID CURVE, A DISTANCE OF 57.74 FEET, SAID CURVE BEING SUBTENDED BY A CHORD BEARING AND DISTANCE OR SOUTH 10°09'39" WEST, 52.34 FEET TO THE POINT OF TANGENCY; THENCE SOUTH 33°22'06" EAST, A DISTANCE OF 7.34 FEET TO THE POINT OF CURVATURE OF A CURVE CONCAVE NORTHEASTERLY AND HAVING A RADIUS OF 163.00 FEET; THENCE SOUTHEASTERLY ALONG THE ARC OF SAID CURVE, A DISTANCE OF 114.26 FEET, SAID CURVE BEING SUBTENDED BY A CHORD BEARING AND DISTANCE OF SOUTH 53°27'03" EAST, 111.94 FEET TO THE POINT OF REVERSE CURVATURE OF A CURVE CONCAVE SOUTHWESTERLY AND HAVING A RADIUS OF 437.00 FEET; THENCE SOUTHEASTERLY ALONG THE ARC OF SAID CURVE, A DISTANCE OF 319.03 FEET, SAID CURVE BEING SUBTENDED BY A CHORD BEARING AND DISTANCE OF SOUTH 52°37'07" EAST, 311.99 FEET TO THE POINT OF REVERSE CURVATURE OF A CURVE CONCAVE NORTHEASTERLY AND HAVING A RADIUS OF 38.00 FEET; THENCE SOUTHEASTERLY ALONG THE ARC OF SAID CURVE, A DISTANCE OF 42.70 FEET, SAID CURVE BEING SUBTENDED BY A CHORD BEARING AND DISTANCE OF SOUTH 63°53'34" EAST, 40.49 FEET TO THE END OF SAID CURVE AT A POINT OF CUSP; THENCE NORTH 13°38'32" WEST, A DISTANCE OF 8.09 FEET TO THE BEGINNING OF A NON-TANGENT CURVE CONCAVE NORTHWESTERLY AND HAVING A RADIUS OF 30.00 FEET; THENCE NORTHEASTERLY ALONG THE ARC OF SAID CURVE, A DISTANCE OF 34.11 FEET, SAID CURVE BEING SUBTENDED BY A CHORD BEARING AND DISTANCE OF NORTH 53°22'54" EAST, 32.30 FEET TO THE POINT OF REVERSE CURVATURE OF A CURVE CONCAVE SOUTHEASTERLY AND HAVING A RADIUS OF 182.00 FEET;

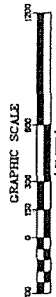
THENCE NORTHEASTERLY ALONG THE ARC OF SAID CURVE, A DISTANCE OF 75.29 FEET, SAID CURVE BEING SUBTENDED BY A CHORD BEARING AND DISTANCE OF NORTH 32°39'44" EAST, 74.75 FEET TO THE POINT OF REVERSE CURVATURE OF A CURVE CONCAVE WESTERLY AND HAVING A RADIUS OF 32.50 FEET; THENCE NORTHERLY ALONG THE ARC OF SAID CURVE, A DISTANCE OF 45.46 FEET, SAID CURVE BEING SUBTENDED BY A CHORD BEARING AND DISTANCE OF NORTH 04°26'26" EAST, 41.84 FEET TO THE END OF SAID CURVE AT A POINT OF CUSP; THENCE NORTH 76°44'26" EAST, A DISTANCE OF 126.16 FEET; THENCE SOUTH 76°57'20" EAST, A DISTANCE OF 125.45 FEET; THENCE SOUTH 50°08'41" EAST, A DISTANCE OF 36.51 FEET TO THE BEGINNING OF A NON-TANGENT CURVE CONCAVE SOUTHERLY AND HAVING A RADIUS OF 30.00 FEET; THENCE EASTERLY ALONG THE ARC OF SAID CURVE, A DISTANCE OF 33.09 FEET, SAID CURVE BEING SUBTENDED BY A CHORD BEARING AND DISTANCE OF NORTH 71°26'59" EAST, 31.43 FEET TO THE POINT OF TANGENCY; THENCE SOUTH 76°57'20" EAST, A DISTANCE OF 312.19 FEET; THENCE NORTH 13°02'40" EAST, A DISTANCE OF 120.00 FEET; THENCE SOUTH 76°57'20" EAST, A DISTANCE OF 7.29 FEET; THENCE NORTH 13°02'20" EAST, A DISTANCE OF 50.51 FEET TO THE BEGINNING OF A NON-TANGENT CURVE CONCAVE NORTHEASTERLY AND HAVING A RADIUS OF 25.00 FEET; THENCE NORTHWESTERLY ALONG THE ARC OF SAID CURVE, A DISTANCE OF 34.23 FEET, SAID CURVE BEING SUBTENDED BY A CHORD BEARING AND DISTANCE OF NORTH 26°10'42" WEST, 31.62 FEET TO THE POINT OF TANGENCY; THENCE NORTH 13°02'40" EAST, A DISTANCE OF 216.50 FEET TO THE POINT OF CURVATURE OF A CURVE CONCAVE WESTERLY AND HAVING A RADIUS OF 630.00 FEET; THENCE NORTHERLY ALONG THE ARC OF SAID CURVE, A DISTANCE OF 183.63 FEET, SAID CURVE BEING SUBTENDED BY A CHORD BEARING AND DISTANCE OF NORTH 04°41'39" EAST, 182.98 FEET TO THE POINT OF REVERSE CURVATURE OF A CURVE CONCAVE SOUTHEASTERLY AND HAVING A RADIUS OF 25.00 FEET; THENCE NORTHEASTERLY ALONG THE ARC OF SAID CURVE, A DISTANCE OF 36.40 FEET, SAID CURVE BEING SUBTENDED BY A CHORD BEARING AND DISTANCE OF NORTH 38°03'21" EAST, 33.27 FEET TO THE POINT OF REVERSE CURVATURE OF A CURVE CONCAVE NORTHERLY AND HAVING A RADIUS OF 540.00 FEET; THENCE EASTERLY ALONG THE ARC OF SAID CURVE, A DISTANCE OF 116.80 FEET, SAID CURVE BEING SUBTENDED BY A CHORD BEARING AND DISTANCE OF NORTH 73°34'16" EAST, 116.57 FEET TO THE END OF SAID CURVE; THENCE SOUTH 22°37'31" EAST, A DISTANCE OF 10.32 FEET TO THE BEGINNING OF A CURVE CONCAVE SOUTHEASTERLY AND HAVING A RADIUS OF 30.00 FEET; THENCE SOUTHWESTERLY ALONG THE ARC OF SAID CURVE, A DISTANCE OF 36.66 FEET, SAID CURVE BEING SUBTENDED BY A CHORD BEARING AND DISTANCE OF SOUTH 30°24'34" WEST, 34.42 FEET TO THE POINT OF REVERSE CURVATURE OF A CURVE CONCAVE WESTERLY AND HAVING A RADIUS OF 750.00 FEET; THENCE SOUTHERLY ALONG THE ARC OF SAID CURVE, A DISTANCE OF 186.24 FEET, SAID CURVE BEING SUBTENDED BY A CHORD BEARING AND DISTANCE OF SOUTH 02°30'57" WEST, 185.76 FEET TO THE POINT OF REVERSE CURVATURE OF A CURVE CONCAVE NORTHEASTERLY AND HAVING A RADIUS OF 30.00 FEET; THENCE SOUTHEASTERLY ALONG THE ARC OF SAID CURVE, A DISTANCE OF 69.94 FEET, SAID CURVE BEING SUBTENDED BY A CHORD BEARING AND DISTANCE OF SOUTH 57°09'24" EAST, 55.14 FEET TO THE POINT OF REVERSE CURVATURE OF A CURVE CONCAVE SOUTHERLY AND HAVING A RADIUS OF 182.00 FEET; THENCE EASTERLY ALONG THE ARC OF SAID CURVE, A DISTANCE OF 221.84 FEET, SAID CURVE BEING SUBTENDED BY A CHORD BEARING AND DISTANCE OF SOUTH 89°01'26" EAST, 208.36 FEET TO THE POINT OF REVERSE CURVATURE OF A CURVE CONCAVE NORTHERLY AND HAVING A RADIUS OF 30.00

FEET; THENCE EASTERLY ALONG THE ARC OF SAID CURVE, A DISTANCE OF 33.38 FEET, SAID CURVE BEING SUBTENDED BY A CHORD BEARING AND DISTANCE OF SOUTH 87°01'47" EAST, 31.69 FEET TO THE END OF SAID CURVE AT A POINT OF CUSP; THENCE SOUTH 28°54'16" EAST, A DISTANCE OF 66.14 FEET; THENCE SOUTH 01°04'57" EAST, A DISTANCE OF 816.74 FEET; THENCE SOUTH 30°17'28" WEST, A DISTANCE OF 54.29 FEET; THENCE SOUTH 89°17'35" WEST, A DISTANCE OF 1107.94 FEET; THENCE SOUTH 06°40'35" EAST, A DISTANCE OF 60.33 FEET TO A POINT ON THE NORTH LINE OF THE PLAT OF TWIN LAKES, AS RECORDED IN MAP BOOK 62, PAGES 13 THROUGH 24 OF SAID PUBLIC RECORDS, ALSO BEING THE SOUTH LINE OF SAID SECTION 34; THENCE SOUTH 89°17'35" WEST, ALONG LAST SAID LINE, A DISTANCE OF 164.43 FEET TO THE NORTHWEST CORNER OF SAID TWIN LAKES; THENCE SOUTH 89°12'19" WEST, ALONG SAID SOUTH LINE OF SECTION 34, ALSO BEING THE NORTH LINE OF SAID SECTION 3, A DISTANCE OF 1124.69 FEET TO THE **POINT OF BEGINNING**.

THE ABOVE DESCRIBED LANDS CONTAIN 49.15 ACRES, MORE OR LESS.

PERMISSION TO REPRODUCE THIS

(SURVEYOR'S DESCRIPTION)

[illegible][illegible]

GENERAL NOTES

- [illegible]

EXHIBIT 4B

FUTURE EXPANSION
PARCEL 1

CURRENT OWNER

ST AUGUSTINE COUNTRY CLUB, LLC

LAND USE DESIGNATION - RES-B

April 7, 2020

EXHIBIT 4C

FUTURE EXPANSION PARCEL 2

(SURVEYOR'S DESCRIPTION)

A PORTION OF SECTION 34, TOWNSHIP 7 SOUTH, RANGE 29 EAST, ST. JOHNS COUNTY, FLORIDA
AND BEING MORE PARTICULARLY DESCRIBED AS FOLLOWS:

FOR A **POINT OF REFERENCE**, COMMENCE AT THE NORTHWEST CORNER OF THE SOUTHEAST 1/4 OF THE SOUTHEAST 1/4 OF SAID SECTION 34; THENCE NORTH 00°48'48" EAST, ALONG A NON-BOUNDARY LINE, A DISTANCE OF 112.08 FEET TO THE **POINT OF BEGINNING**; THENCE NORTH 00°05'31" EAST, A DISTANCE OF 40.02 FEET TO THE BEGINNING OF A NON-TANGENT CURVE CONCAVE NORTHERLY AND HAVING A RADIUS OF 1410.00 FEET; THENCE WESTERLY ALONG THE ARC OF SAID CURVE, A DISTANCE OF 389.87 FEET, SAID CURVE BEING SUBTENDED BY A CHORD BEARING AND DISTANCE OF NORTH 80°15'14" WEST, 388.63 FEET TO THE POINT OF REVERSE CURVATURE OF A CURVE CONCAVE SOUTHERLY AND HAVING A RADIUS OF 1380.00 FEET; THENCE WESTERLY ALONG THE ARC OF SAID CURVE, A DISTANCE OF 251.55 FEET, SAID CURVE BEING SUBTENDED BY A CHORD BEARING AND DISTANCE OF NORTH 77°33'16" WEST, 251.20 FEET TO THE END OF SAID CURVE; THENCE NORTH 05°58'40" EAST, A DISTANCE OF 104.31 FEET TO THE POINT OF CURVATURE OF A CURVE CONCAVE SOUTHEASTERLY AND HAVING A RADIUS OF 25.00 FEET; THENCE NORTHEASTERLY ALONG THE ARC OF SAID CURVE, A DISTANCE OF 23.97 FEET, SAID CURVE BEING SUBTENDED BY A CHORD BEARING AND DISTANCE OF NORTH 33°26'42" EAST, 23.06 FEET TO THE END OF SAID CURVE; THENCE NORTH 07°34'10" EAST, A DISTANCE OF 55.01 FEET; THENCE NORTH 82°37'27" WEST, A DISTANCE OF 8.22 FEET; THENCE NORTH 07°13'30" EAST, A DISTANCE OF 129.90 FEET; THENCE NORTH 35°52'21" EAST, A DISTANCE OF 18.74 FEET; THENCE NORTH 89°03'09" EAST, A DISTANCE OF 97.38 FEET; THENCE NORTH 33°16'51" EAST, A DISTANCE OF 65.46 FEET; THENCE NORTH 37°51'58" EAST, A DISTANCE OF 44.13 FEET TO THE POINT OF CURVATURE OF A CURVE CONCAVE SOUTHERLY AND HAVING A RADIUS OF 55.10 FEET; THENCE EASTERLY ALONG THE ARC OF SAID CURVE, A DISTANCE OF 71.17 FEET, SAID CURVE BEING SUBTENDED BY A CHORD BEARING AND DISTANCE OF NORTH 74°59'43" EAST, 66.33 FEET TO THE POINT OF TANGENCY; THENCE SOUTH 66°43'55" EAST, A DISTANCE OF 71.42 FEET TO THE BEGINNING OF A NON-TANGENT CURVE CONCAVE NORTHERLY AND HAVING A RADIUS OF 187.39 FEET; THENCE EASTERLY ALONG THE ARC OF SAID CURVE, A DISTANCE OF 31.47 FEET, SAID CURVE BEING SUBTENDED BY A CHORD BEARING AND DISTANCE OF SOUTH 77°19'57" EAST, 31.43 FEET TO THE END OF SAID CURVE; THENCE NORTH 46°08'31" EAST, A DISTANCE OF 35.75 FEET; THENCE NORTH 84°38'38" EAST, A DISTANCE OF 40.36 FEET; THENCE SOUTH 60°24'10" EAST, A DISTANCE OF 24.74 FEET; THENCE SOUTH 06°48'50" WEST, A DISTANCE OF 123.98 FEET; THENCE SOUTH 58°13'22" EAST, A DISTANCE OF 29.30 FEET; THENCE SOUTH 81°14'37" EAST, A DISTANCE OF 26.99 FEET; THENCE SOUTH 66°24'25" EAST, A DISTANCE OF 41.03 FEET; THENCE SOUTH 51°34'13" EAST, A DISTANCE OF 53.98 FEET; THENCE SOUTH 47°06'41" EAST, A DISTANCE OF 73.50 FEET TO A POINT ON THE SOUTHERLY PROLONGATION OF THE WEST LINE OF THOSE LANDS AS DESCRIBED IN OFFICIAL RECORDS BOOK 4551, PAGE 1821 OF THE PUBLIC RECORDS OF ST. JOHNS COUNTY, FLORIDA; THENCE NORTH 00°05'31" EAST, ALONG LAST SAID

PROLONGATION, A DISTANCE OF 390.85 FEET TO A POINT ON THE APPROXIMATE CENTERLINE OF MOULTRIE CREEK; THENCE SOUTHEASTERLY ALONG THE CENTERLINE OF SAID CREEK ALSO BEING THE SOUTHERLY LINE OF LAST SAID LANDS, THE FOLLOWING 22 COURSES AND DISTANCES: COURSE 1) THENCE SOUTH 26°03'43" EAST, A DISTANCE OF 26.23 FEET; COURSE 2) THENCE SOUTH 26°03'43" EAST, A DISTANCE OF 31.40 FEET; COURSE 3) THENCE SOUTH 12°23'10" EAST, A DISTANCE OF 46.13 FEET; COURSE 4) THENCE SOUTH 41°28'47" WEST, A DISTANCE OF 38.09 FEET; COURSE 5) THENCE SOUTH 39°22'09" EAST, A DISTANCE OF 26.08 FEET; COURSE 6) THENCE SOUTH 36°54'30" EAST, A DISTANCE OF 30.34 FEET; COURSE 7) THENCE NORTH 56°07'31" EAST, A DISTANCE OF 28.69 FEET; COURSE 8) THENCE SOUTH 89°48'48" EAST, A DISTANCE OF 42.78 FEET; COURSE 9) THENCE SOUTH 20°45'29" EAST, A DISTANCE OF 51.65 FEET; COURSE 10) THENCE SOUTH 67°58'10" EAST, A DISTANCE OF 64.38 FEET; COURSE 11) THENCE SOUTH 30°00'15" EAST, A DISTANCE OF 37.04 FEET; COURSE 12) THENCE NORTH 76°54'38" EAST, A DISTANCE OF 68.18 FEET; COURSE 13) THENCE NORTH 08°55'59" WEST, A DISTANCE OF 39.24 FEET; COURSE 14) THENCE SOUTH 86°58'13" EAST, A DISTANCE OF 38.35 FEET; COURSE 15) THENCE SOUTH 51°12'04" EAST, A DISTANCE OF 20.87 FEET; COURSE 16) THENCE NORTH 52°50'17" EAST, A DISTANCE OF 9.27 FEET; COURSE 17) THENCE SOUTH 85°39'32" EAST, A DISTANCE OF 36.81 FEET; COURSE 18) THENCE NORTH 68°41'08" EAST, A DISTANCE OF 26.14 FEET; COURSE 19) THENCE SOUTH 41°44'50" EAST, A DISTANCE OF 62.28 FEET; COURSE 20) THENCE SOUTH 19°00'27" EAST, A DISTANCE OF 65.15 FEET; COURSE 21) THENCE SOUTH 48°27'15" EAST, A DISTANCE OF 14.07 FEET; COURSE 22) THENCE NORTH 32°13'07" EAST, DEPARTING SAID APPROXIMATE CENTERLINE OF MOULTRIE CREEK, A DISTANCE OF 94.78 FEET TO A POINT ON THE SOUTHWEST LINE OF LAST SAID LANDS; THENCE SOUTH 57°48'56" EAST, ALONG LAST SAID SOUTHWEST LINE AND ALONG THE SOUTHWEST LINE OF THOSE LANDS AS DESCRIBED IN OFFICIAL RECORDS BOOK 4127, PAGE 133 OF SAID PUBLIC RECORDS, A DISTANCE OF 700.34 FEET TO A POINT ON THE NORTHWEST RIGHT OF WAY LINE OF STATE ROAD 207, A VARIABLE WIDTH RIGHT OF WAY PER THE FLORIDA DEPARTMENT OF TRANSPORTATION RIGHT OF WAY MAP SECTION 78050-2516; THENCE SOUTHWESTERLY ALONG SAID NORTHWESTERLY RIGHT OF WAY LINE, THE FOLLOWING 3 COURSES AND DISTANCES: COURSE 1) THENCE SOUTH 36°22'42" WEST, A DISTANCE OF 292.40 FEET TO A TRANSITION IN THE RIGHT OF WAY WIDTH; COURSE 2) THENCE SOUTH 53°08'21" EAST, ALONG SAID TRANSITION LINE, A DISTANCE OF 9.99 FEET; COURSE 3) THENCE SOUTH 36°22.58" WEST, A DISTANCE OF 217.46 FEET; THENCE NORTH 53°38'18" WEST, DEPARTING SAID RIGHT OF WAY LINE, A DISTANCE OF 19.67 FEET; THENCE SOUTH 81°15'35" WEST, A DISTANCE OF 66.97 FEET; THENCE SOUTH 41°37'26" WEST, A DISTANCE OF 10.00 FEET TO THE BEGINNING OF A NON-TANGENT CURVE CONCAVE SOUTHWESTERLY AND HAVING A RADIUS OF 348.00 FEET; THENCE NORTHWESTERLY ALONG THE ARC OF SAID CURVE, A DISTANCE OF 138.78 FEET, SAID CURVE BEING SUBTENDED BY A CHORD BEARING AND DISTANCE OF NORTH 59°14'33" WEST, 137.87 FEET TO THE POINT OF REVERSE CURVATURE OF A CURVE CONCAVE NORTHEASTERLY AND HAVING A RADIUS OF 190.00 FEET; THENCE NORTHWESTERLY ALONG THE ARC OF SAID CURVE, A DISTANCE OF 54.87 FEET, SAID CURVE BEING SUBTENDED BY A CHORD BEARING AND DISTANCE OF NORTH 62°23'41" WEST, 54.68 FEET TO THE POINT OF TANGENCY; THENCE NORTH 54°07'18" WEST, A DISTANCE OF 269.66 FEET TO THE POINT OF CURVATURE OF A CURVE CONCAVE SOUTHWESTERLY AND HAVING A RADIUS OF 350.00 FEET; THENCE NORTHWESTERLY ALONG THE ARC OF SAID CURVE, A DISTANCE OF 226.98 FEET, SAID

CURVE BEING SUBTENDED BY A CHORD BEARING AND DISTANCE OF NORTH 72°42'00" WEST, 223.02 FEET TO THE POINT OF TANGENCY; THENCE SOUTH 88°43'17" WEST, A DISTANCE OF 50.04 FEET TO THE POINT OF CURVATURE OF A CURVE CONCAVE NORTHERLY AND HAVING A RADIUS OF 1450.00 FEET; THENCE WESTERLY ALONG THE ARC OF SAID CURVE, A DISTANCE OF 77.33 FEET, SAID CURVE BEING SUBTENDED BY A CHORD BEARING AND DISTANCE OF NORTH 89°45'02" WEST, 77.32 FEET TO THE END OF SAID CURVE AND THE **POINT OF BEGINNING**.

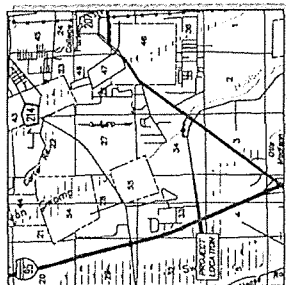
THE ABOVE DESCRIBED LANDS CONTAIN 18.86 ACRES, MORE OR LESS.

Unemployment Discretion

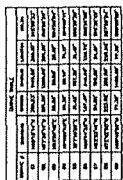
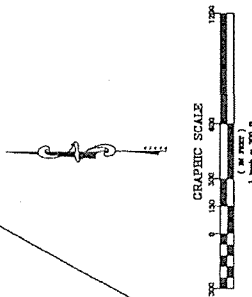
A PORTION OF SECTION 34, TOWNSHIP 7 SOUTH, RANGE 28 EAST, ST. JOHNS COUNTY, FLORIDA AND BEING MORE PARTICULARLY DESCRIBED AS FOLLOWS:

[illegible]

THE ABOVE DESCRIBED LANDS CONTAIN 12.85 ACRES. MOST OF LOT 3.



VICINITY MAP
NOT TO SCALE



1. ACTUAL
 2. ACTUAL
 3. ACTUAL
 4. ACTUAL
 5. ACTUAL
 6. ACTUAL
 7. ACTUAL
 8. ACTUAL
 9. ACTUAL
 10. ACTUAL
 11. ACTUAL
 12. ACTUAL
 13. ACTUAL
 14. ACTUAL
 15. ACTUAL
 16. ACTUAL
 17. ACTUAL
 18. ACTUAL
 19. ACTUAL
 20. ACTUAL
 21. ACTUAL
 22. ACTUAL
 23. ACTUAL
 24. ACTUAL
 25. ACTUAL
 26. ACTUAL
 27. ACTUAL
 28. ACTUAL
 29. ACTUAL
 30. ACTUAL
 31. ACTUAL
 32. ACTUAL
 33. ACTUAL
 34. ACTUAL
 35. ACTUAL
 36. ACTUAL
 37. ACTUAL
 38. ACTUAL
 39. ACTUAL
 40. ACTUAL
 41. ACTUAL
 42. ACTUAL
 43. ACTUAL
 44. ACTUAL
 45. ACTUAL
 46. ACTUAL
 47. ACTUAL
 48. ACTUAL
 49. ACTUAL
 50. ACTUAL
 51. ACTUAL
 52. ACTUAL
 53. ACTUAL
 54. ACTUAL
 55. ACTUAL
 56. ACTUAL
 57. ACTUAL
 58. ACTUAL
 59. ACTUAL
 60. ACTUAL
 61. ACTUAL
 62. ACTUAL
 63. ACTUAL
 64. ACTUAL
 65. ACTUAL
 66. ACTUAL
 67. ACTUAL
 68. ACTUAL
 69. ACTUAL
 70. ACTUAL
 71. ACTUAL
 72. ACTUAL
 73. ACTUAL
 74. ACTUAL
 75. ACTUAL
 76. ACTUAL
 77. ACTUAL
 78. ACTUAL
 79. ACTUAL
 80. ACTUAL
 81. ACTUAL
 82. ACTUAL
 83. ACTUAL
 84. ACTUAL
 85. ACTUAL
 86. ACTUAL
 87. ACTUAL
 88. ACTUAL
 89. ACTUAL
 90. ACTUAL
 91. ACTUAL
 92. ACTUAL
 93. ACTUAL
 94. ACTUAL
 95. ACTUAL
 96. ACTUAL
 97. ACTUAL
 98. ACTUAL
 99. ACTUAL
 100. ACTUAL

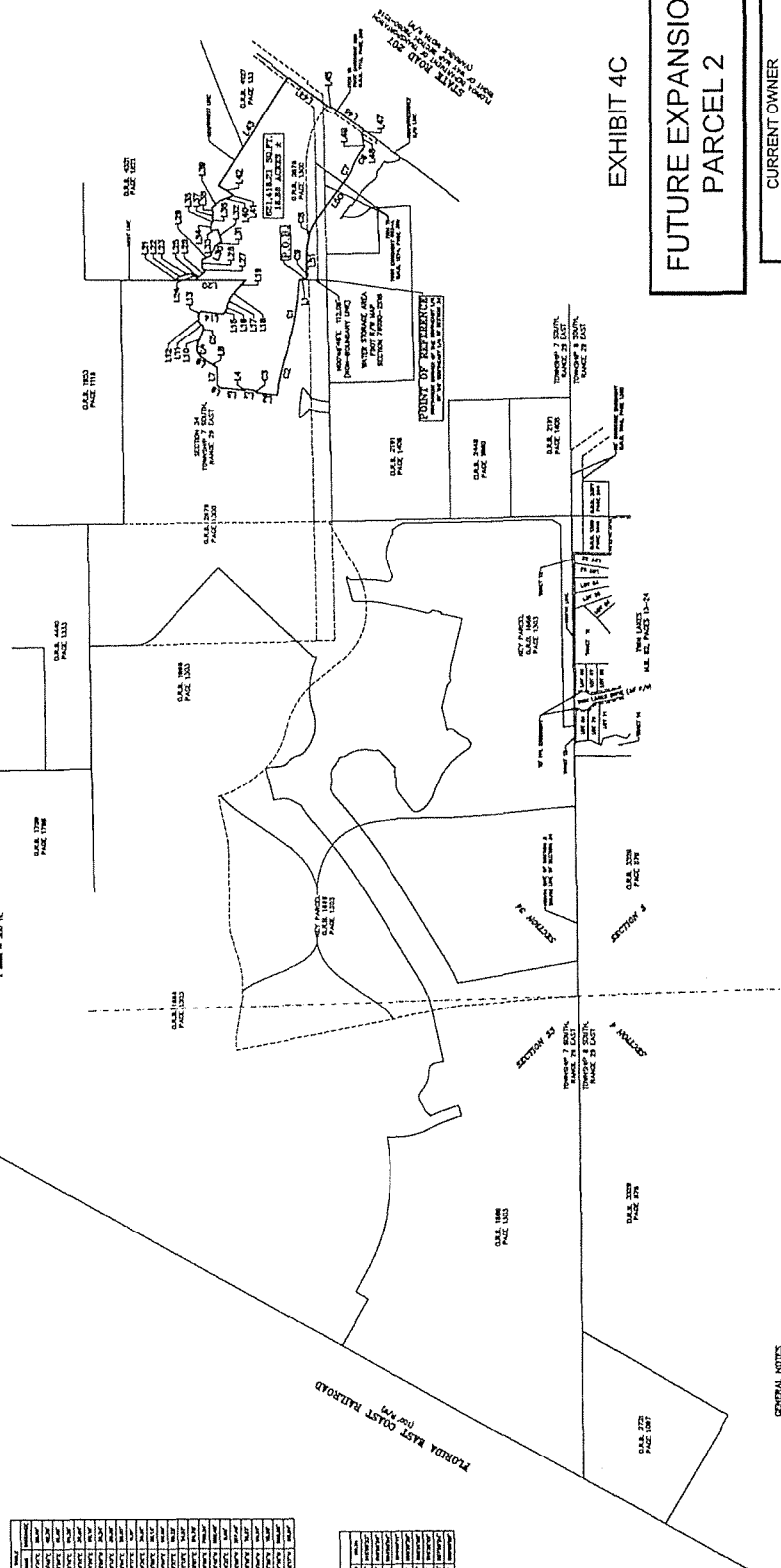


EXHIBIT 4C

FUTURE EXPANSION
PARCEL 2

CURRENT OWNER

SOUTHEAST INVESTMENTS #17, LLC

AND USE DESIGNATION - RES-B & M

April 7, 2020

- THIS IS NOT A BOMBARD SUBJECT, NOR DOES IT APPEAR TO BE SUCH. EXAMINING SHOWS BOMBARD ENTER TO THE FLORIDA STATE PLANE COORDINATE SYSTEM, FLORIDA TALL TALL NORTH AMERICAN DAILY OF THIS (AND) WAS AS DERIVED BY A MODEL FOR BOMBARD AND CARRIED BY BOMBARD AIRCRAFT.
- ALL BOMBARD SUBJECTS WERE FOUND TO BE IN THE AND IN THE AND WERE BASED ON THE BOMBARD SUBJECT.
- THIS SUBJECT WAS PERFORMED WITH THE BENEFIT OF THE COMPARISON.
- NOTICE: THERE MAY BE ADDITIONAL RESTRICTIONS THAT MAY BE SHOWN ON THIS SUBJECT.

EXHIBIT 4C

FUTURE EXPANSION PARCEL 3

(SURVEYOR'S DESCRIPTION)

A PORTION OF SECTION 33, SECTION 34 AND SECTION 55, ALL LYING IN TOWNSHIP 7 SOUTH, RANGE 29 EAST, ST. JOHNS COUNTY, FLORIDA AND BEING MORE PARTICULARLY DESCRIBED AS FOLLOWS:

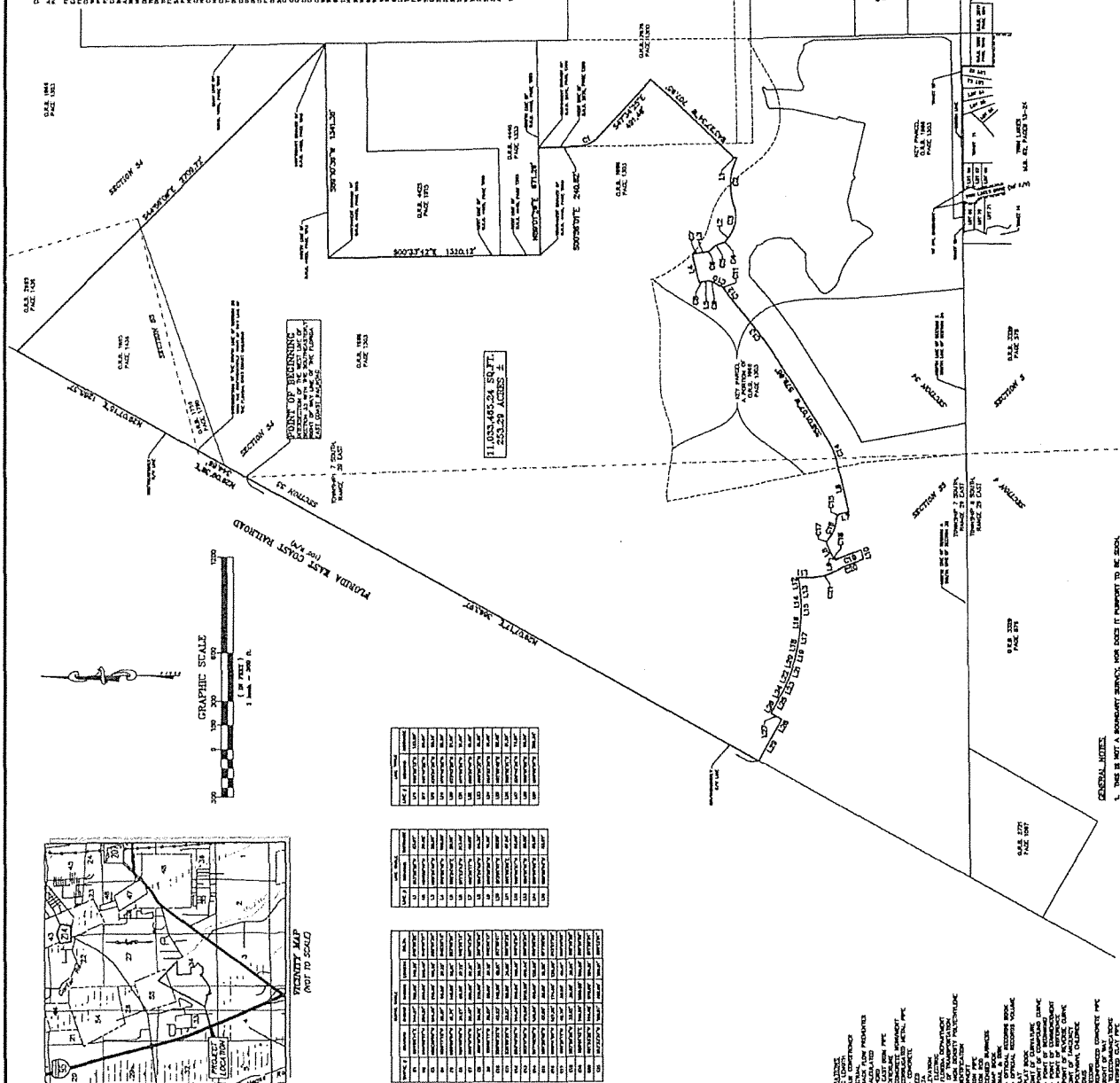
FOR A **POINT OF BEGINNING**, COMMENCE AT THE INTERSECTION OF THE WEST LINE OF SAID SECTION 33 WITH THE SOUTHEAST RIGHT OF WAY LINE OF THE FLORIDA EAST COAST RAILROAD, BEING A 100 FOOT RIGHT OF WAY; THENCE NORTH 29°09'38" EAST, ALONG SAID SOUTHEAST RIGHT OF WAY LINE, A DISTANCE OF 344.66 FEET TO THE INTERSECTION WITH SAID SOUTHEASTERLY RIGHT OF WAY LINE WITH THE SOUTH LINE OF SAID SECTION 55; THENCE NORTH 29°07'15" EAST, CONTINUING ALONG SAID SOUTHEASTERLY RIGHT OF WAY LINE, A DISTANCE OF 1285.37 FEET; THENCE SOUTH 44°56'09" EAST, DEPARTING LAST SAID RIGHT OF WAY LINE, A DISTANCE OF 2709.72 FEET TO A POINT ON THE EAST LINE OF THOSE LANDS AS DESCRIBED IN OFFICIAL RECORDS BOOK 1666, PAGE 1303 OF THE PUBLIC RECORDS OF ST. JOHNS COUNTY, FLORIDA, SAID POINT BEING THE NORTHEAST CORNER OF THOSE LANDS AS DESCRIBED IN OFFICIAL RECORDS BOOK 4425, PAGE 1015 OF SAID PUBIC RECORDS; THENCE SOUTH 89°10'36" WEST, ALONG THE NORTH LINE THEREOF, A DISTANCE OF 1341.36 FEET TO THE NORTHWEST CORNER THEREOF; THENCE SOUTH 00°33'42" EAST, ALONG THE WEST LINE THEREOF AND THE WEST LINE OF THOSE LANDS AS DESCRIBED IN OFFICIAL RECORDS BOOK 4440, PAGE 1333, A DISTANCE OF 1320.12 FEET TO THE SOUTHWEST CORNER THEREOF; THENCE NORTH 89°01'26" EAST, ALONG THE SOUTH LINE THEREOF, A DISTANCE OF 671.26 FEET TO THE NORTHWEST CORNER OF THOSE LANDS AS DESCRIBED IN OFFICIAL RECORDS BOOK 2676, PAGE 1300 OF SAID PUBLIC RECORDS; THENCE SOUTH 00°56'01" EAST, ALONG THE WEST LINE THEREOF, A DISTANCE OF 240.82 FEET TO THE POINT OF CURVATURE OF A CURVE CONCAVE NORTHEASTERLY AND HAVING A RADIUS OF 182.00 FEET; THENCE SOUTHEASTERLY ALONG THE ARC OF SAID CURVE, DEPARTING LAST SAID WEST LINE, A DISTANCE OF 149.10 FEET, SAID CURVE BEING SUBTENDED BY A CHORD BEARING AND DISTANCE OF SOUTH 24°06'14" EAST, 144.97 FEET TO THE POINT OF TANGENCY; THENCE SOUTH 47°34'25" EAST, A DISTANCE OF 491.49 FEET; THENCE SOUTH 43°27'34" WEST, A DISTANCE OF 707.95 FEET; THENCE SOUTH 13°25'26" WEST, A DISTANCE OF 23.97 FEET TO THE BEGINNING OF A NON-TANGENT CURVE CONCAVE SOUTHERLY AND HAVING A RADIUS OF 390.00 FEET; THENCE WESTERLY ALONG THE ARC OF SAID CURVE, A DISTANCE OF 308.49 FEET, SAID CURVE BEING SUBTENDED BY A CHORD BEARING AND DISTANCE OF NORTH 86°03'17" WEST, 300.51 FEET TO THE POINT OF REVERSE CURVATURE OF A CURVE CONCAVE NORTHERLY AND HAVING A RADIUS OF 210.00 FEET; THENCE WESTERLY ALONG THE ARC OF SAID CURVE, A DISTANCE OF 191.18 FEET, SAID CURVE BEING SUBTENDED BY A CHORD BEARING AND DISTANCE OF NORTH 82°38'09" WEST, 184.65 FEET TO THE POINT OF TANGENCY; THENCE NORTH 56°33'19" WEST, A DISTANCE OF 35.82 FEET TO THE POINT OF CURVATURE OF A CURVE CONCAVE NORTHEASTERLY AND HAVING A RADIUS OF 50.00 FEET; THENCE NORTHWESTERLY ALONG THE ARC OF SAID CURVE, A DISTANCE OF 37.12 FEET, SAID CURVE BEING SUBTENDED BY A CHORD

BEARING AND DISTANCE OF NORTH 35°17'12" WEST, 36.27 FEET TO THE POINT OF REVERSE CURVATURE OF A CURVE CONCAVE SOUTHWESTERLY AND HAVING A RADIUS OF 140.00 FEET; THENCE NORTHWESTERLY ALONG THE ARC OF SAID CURVE, A DISTANCE OF 82.91 FEET, SAID CURVE BEING SUBTENDED BY A CHORD BEARING AND DISTANCE OF NORTH 30°59'04" WEST, 81.71 FEET TO THE POINT OF REVERSE CURVATURE OF A CURVE CONCAVE NORTHEASTERLY AND HAVING A RADIUS OF 50.00 FEET; THENCE NORTHWESTERLY ALONG THE ARC OF SAID CURVE, A DISTANCE OF 37.12 FEET, SAID CURVE BEING SUBTENDED BY A CHORD BEARING AND DISTANCE OF NORTH 26°40'55" WEST, 36.27 FEET TO THE POINT OF TANGENCY; THENCE NORTH 05°24'49" WEST, A DISTANCE OF 28.66 FEET TO THE POINT OF CURVATURE OF A CURVE CONCAVE WESTERLY AND HAVING A RADIUS OF 390.00 FEET; THENCE NORTHERLY ALONG THE ARC OF SAID CURVE, A DISTANCE OF 52.51 FEET, SAID CURVE BEING SUBTENDED BY A CHORD BEARING AND DISTANCE OF NORTH 09°16'16" WEST, 52.47 FEET TO THE END OF SAID CURVE; THENCE SOUTH 76°52'18" WEST, A DISTANCE OF 180.00 FEET TO THE BEGINNING OF A NON-TANGENT CURVE CONCAVE WESTERLY AND HAVING A RADIUS OF 210.00 FEET; THENCE SOUTHERLY ALONG THE ARC OF SAID CURVE, A DISTANCE OF 28.28 FEET, SAID CURVE BEING SUBTENDED BY A CHORD BEARING AND DISTANCE OF SOUTH 09°16'16" EAST, 28.26 FEET TO THE POINT OF TANGENCY; THENCE SOUTH 05°24'49" EAST, A DISTANCE OF 28.66 FEET TO THE POINT OF CURVATURE OF A CURVE CONCAVE WESTERLY AND HAVING A RADIUS OF 50.00 FEET; THENCE SOUTHERLY ALONG THE ARC OF SAID CURVE, A DISTANCE OF 37.12 FEET, SAID CURVE BEING SUBTENDED BY A CHORD BEARING AND DISTANCE OF SOUTH 15°51'17" WEST, 36.27 FEET TO THE POINT OF REVERSE CURVATURE OF A CURVE CONCAVE SOUTHEASTERLY AND HAVING A RADIUS OF 140.00 FEET; THENCE SOUTHWESTERLY ALONG THE ARC OF SAID CURVE, A DISTANCE OF 43.81 FEET, SAID CURVE BEING SUBTENDED BY A CHORD BEARING AND DISTANCE OF SOUTH 28°09'33" WEST, 43.63 FEET TO THE POINT OF REVERSE CURVATURE OF A CURVE CONCAVE NORTHWESTERLY AND HAVING A RADIUS OF 50.00 FEET; THENCE SOUTHWESTERLY ALONG THE ARC OF SAID CURVE, A DISTANCE OF 34.55 FEET, SAID CURVE BEING SUBTENDED BY A CHORD BEARING AND DISTANCE OF SOUTH 38°59'25" WEST, 33.87 FEET TO THE POINT OF REVERSE CURVATURE OF A CURVE CONCAVE SOUTHEASTERLY AND HAVING A RADIUS OF 590.00 FEET; THENCE SOUTHWESTERLY ALONG THE ARC OF SAID CURVE, A DISTANCE OF 105.10 FEET, SAID CURVE BEING SUBTENDED BY A CHORD BEARING AND DISTANCE OF SOUTH 53°40'56" WEST, 104.96 FEET TO THE POINT OF REVERSE CURVATURE OF A CURVE CONCAVE NORTHWESTERLY AND HAVING A RADIUS OF 2910.00 FEET; THENCE SOUTHWESTERLY ALONG THE ARC OF SAID CURVE, A DISTANCE OF 479.44 FEET, SAID CURVE BEING SUBTENDED BY A CHORD BEARING AND DISTANCE OF SOUTH 53°17'55" WEST, 478.90 FEET TO THE POINT OF TANGENCY; THENCE SOUTH 58°01'07" WEST, A DISTANCE OF 579.66 FEET TO THE POINT OF CURVATURE OF A CURVE CONCAVE NORTHWESTERLY AND HAVING A RADIUS OF 410.00 FEET; THENCE SOUTHWESTERLY ALONG THE ARC OF SAID CURVE, A DISTANCE OF 138.66 FEET, SAID CURVE BEING SUBTENDED BY A CHORD BEARING AND DISTANCE OF SOUTH 67°42'25" WEST, A DISTANCE OF 138.00 FEET TO THE POINT OF TANGENCY; THENCE SOUTH 77°23'43" WEST, A DISTANCE OF 313.68 FEET; THENCE NORTH 12°36'17" WEST, A DISTANCE OF 48.53 FEET TO THE POINT OF CURVATURE OF A CURVE CONCAVE SOUTHWESTERLY AND HAVING A RADIUS OF 38.00 FEET; THENCE NORTHWESTERLY ALONG THE ARC OF SAID CURVE, A DISTANCE OF 51.50 FEET, SAID CURVE BEING SUBTENDED BY A CHORD BEARING AND DISTANCE OF NORTH 51°25'42" WEST, 47.65 FEET TO THE POINT OF

REVERSE CURVATURE OF A CURVE CONCAVE NORTHERLY AND HAVING A RADIUS OF 174.00 FEET; THENCE WESTERLY ALONG THE ARC OF SAID CURVE, A DISTANCE OF 130.99 FEET, SAID CURVE BEING SUBTENDED BY A CHORD BEARING AND DISTANCE OF NORTH 68°41'09" WEST, 127.92 FEET TO THE POINT OF REVERSE CURVATURE OF A CURVE CONCAVE SOUTHERLY AND HAVING A RADIUS OF 38.00 FEET; THENCE WESTERLY ALONG THE ARC OF SAID CURVE, A DISTANCE OF 45.41 FEET, SAID CURVE BEING SUBTENDED BY A CHORD BEARING AND DISTANCE OF NORTH 81°21'11" WEST, 42.76 FEET TO THE POINT OF TANGENCY; THENCE SOUTH 64°24'48" WEST, A DISTANCE OF 64.36 FEET TO THE POINT OF CURVATURE OF A CURVE CONCAVE SOUTHEASTERLY AND HAVING A RADIUS OF 38.00 FEET; THENCE SOUTHWESTERLY ALONG THE ARC OF SAID CURVE, A DISTANCE OF 35.04 FEET, SAID CURVE BEING SUBTENDED BY A CHORD BEARING AND DISTANCE OF SOUTH 37°59'38" WEST, 33.82 FEET TO THE END OF SAID CURVE; THENCE NORTH 78°25'33" WEST, A DISTANCE OF 11.66 FEET TO THE BEGINNING OF A NON-TANGENT CURVE CONCAVE WESTERLY AND HAVING A RADIUS OF 1030.00 FEET; THENCE SOUTHERLY ALONG THE ARC OF SAID CURVE, A DISTANCE OF 169.88 FEET, SAID CURVE BEING SUBTENDED BY A CHORD BEARING AND DISTANCE OF SOUTH 20°51'43" EAST, 169.69 FEET TO THE END OF SAID CURVE; THENCE SOUTH 73°51'47" WEST, A DISTANCE OF 60.00 FEET TO THE BEGINNING OF A NON-TANGENT CURVE CONCAVE WESTERLY AND HAVING A RADIUS OF 970.00 FEET; THENCE NORTHERLY ALONG THE ARC OF SAID CURVE, A DISTANCE OF 194.81 FEET, SAID CURVE BEING SUBTENDED BY A CHORD BEARING AND DISTANCE OF NORTH 21°53'25" WEST, 194.48 FEET TO THE POINT OF REVERSE CURVATURE OF A CURVE CONCAVE EASTERLY AND HAVING A RADIUS OF 362.00 FEET; THENCE NORTHERLY ALONG THE ARC OF SAID CURVE, A DISTANCE OF 190.81 FEET, SAID CURVE BEING SUBTENDED BY A CHORD BEARING AND DISTANCE OF NORTH 12°32'37" WEST, 188.61 FEET TO THE POINT OF TANGENCY; THENCE NORTH 01°08'58" EAST, A DISTANCE OF 47.64 FEET; THENCE SOUTH 80°59'57" WEST, A DISTANCE OF 62.95 FEET; THENCE SOUTH 84°01'41" WEST, A DISTANCE OF 58.09 FEET; THENCE SOUTH 86°56'06" WEST, A DISTANCE OF 58.09 FEET; THENCE SOUTH 89°28'44" WEST, A DISTANCE OF 43.57 FEET; THENCE NORTH 86°20'13" WEST, A DISTANCE OF 123.60 FEET; THENCE NORTH 81°47'22" WEST, A DISTANCE OF 58.09 FEET; THENCE NORTH 78°34'36" WEST, A DISTANCE OF 53.10 FEET; THENCE NORTH 76°46'58" WEST, A DISTANCE OF 53.00 FEET; THENCE NORTH 73°43'58" WEST, A DISTANCE OF 51.66 FEET; THENCE NORTH 71°08'51" WEST, A DISTANCE OF 51.66 FEET; THENCE NORTH 68°33'44" WEST, A DISTANCE OF 51.66 FEET; THENCE NORTH 65°58'37" WEST, A DISTANCE OF 51.66 FEET; THENCE NORTH 63°23'30" WEST, A DISTANCE OF 51.66 FEET; THENCE NORTH 61°09'48" WEST, A DISTANCE OF 52.48 FEET; THENCE NORTH 60°52'51" WEST, A DISTANCE OF 61.57 FEET; THENCE SOUTH 30°42'38" WEST, A DISTANCE OF 77.87 FEET; THENCE NORTH 59°51'05" WEST, A DISTANCE OF 60.00 FEET; THENCE NORTH 60°52'51" WEST, A DISTANCE OF 232.34 FEET TO A POINT ON THE AFOREMENTIONED SOUTHEAST RIGHT OF WAY LINE OF THE FLORIDA EAST COAST RAILROAD; THENCE NORTH 29°07'17" EAST, ALONG SAID SOUTHEAST RIGHT OF WAY LINE, A DISTANCE OF 3663.97 FEET TO THE **POINT OF BEGINNING**.

THE ABOVE DESCRIBED LANDS CONTAIN 253.29 ACRES, MORE OR LESS.

MAP SHOWING SKETCH & DESCRIPTION OF

[illegible]

NOTES

- [illegible]

EXHIBIT 4D

FUTURE EXPANSION
PARCEL 3

CURRENT OWNER

ELMMW, LLC
SOUTHEAST INVESTMENTS #17, LLC
ST AUGUSTINE COUNTRY CLUB, LLC

LAND USE DESIGNATION - RES-B

April 7, 2020

EXHIBIT 5

ENTRADA COMMUNITY DEVELOPMENT DISTRICT

EXHIBIT 5

EXISTING / FUTURE LAND USE

April 7, 2020

LEGEND



ENTRADA CDD



FUTURE
EXPANSION
PARCEL

RES-B

= RESIDENTIAL B

RES-C

= RESIDENTIAL C

Md

= MIXED USE DISTRICT

BC

= BUSINESS COMMERCIAL

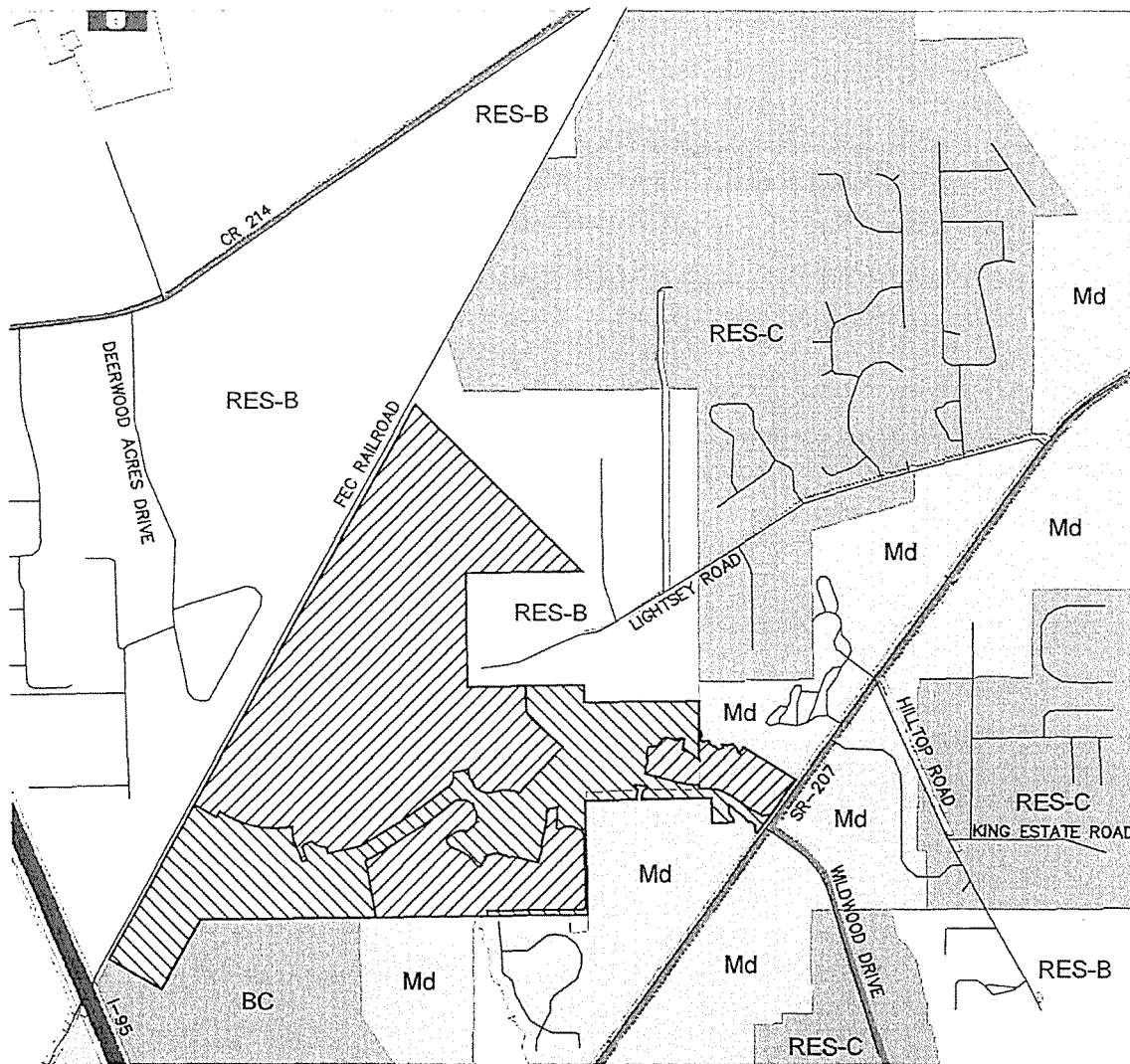
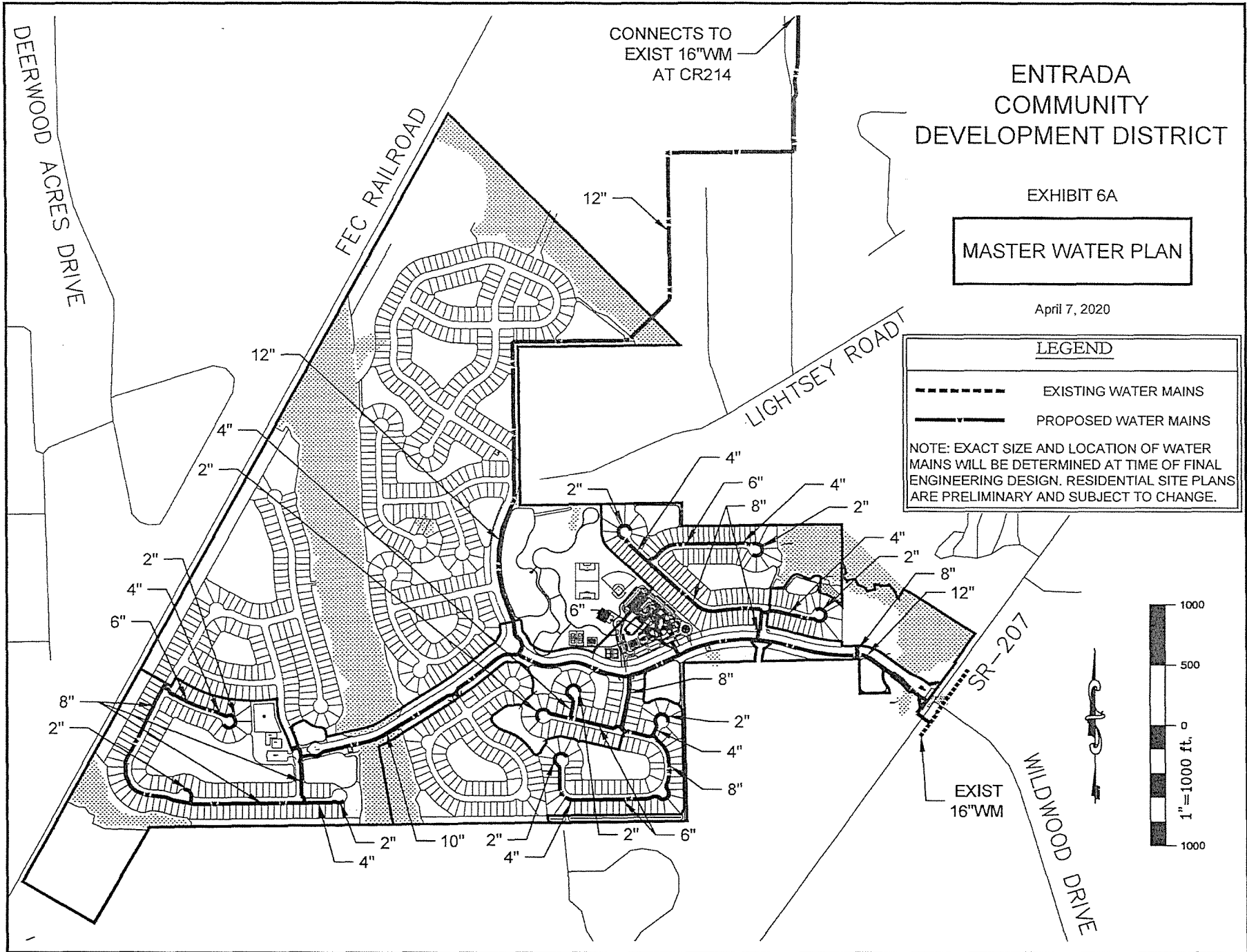


EXHIBIT 6



ENTRADA COMMUNITY DEVELOPMENT DISTRICT

EXHIBIT 6B

MASTER SEWER PLAN

April 7, 2020

LEGEND

FM FORCE MAIN

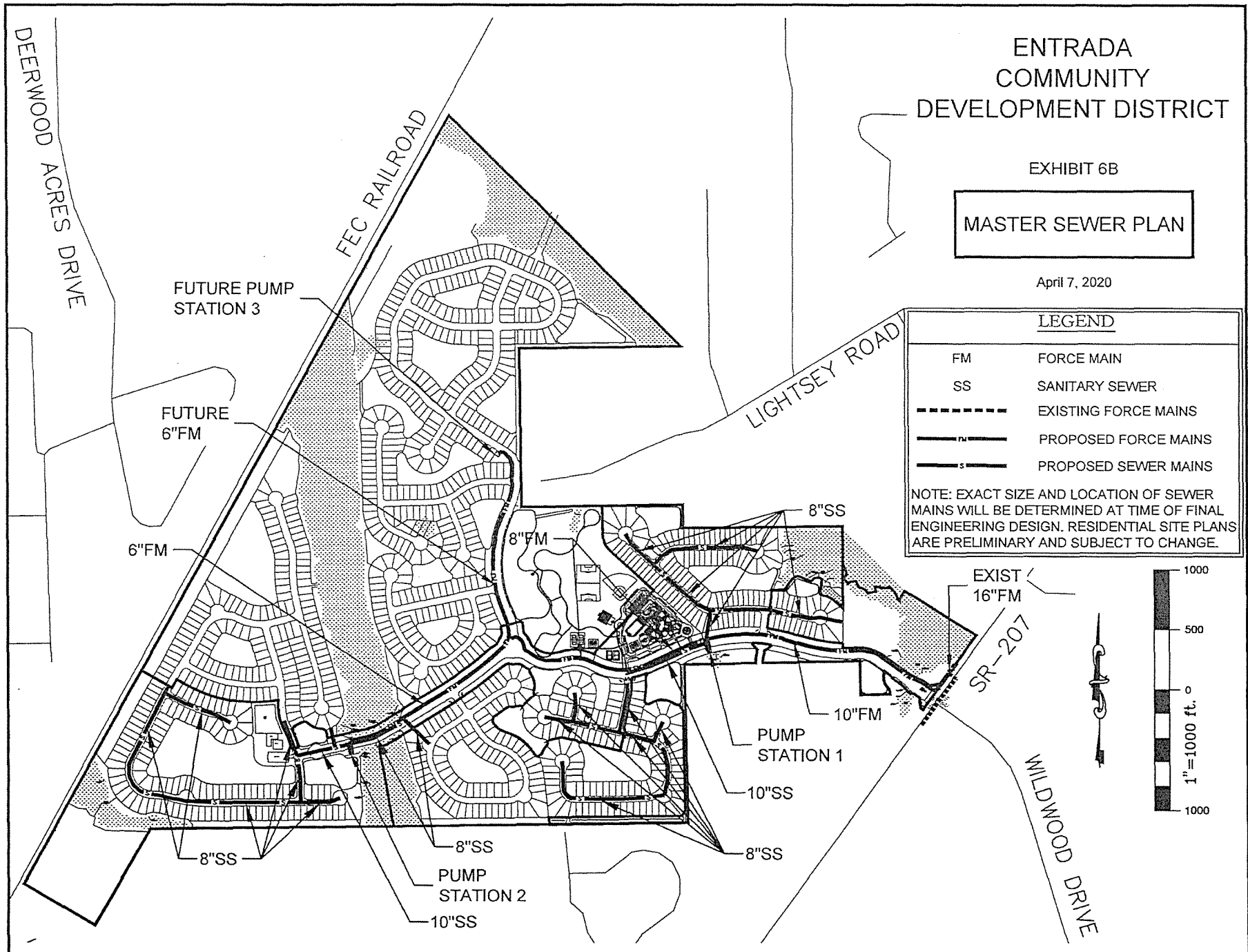
SS SANITARY SEWER

----- EXISTING FORCE MAINS

———— PROPOSED FORCE MAINS

———— PROPOSED SEWER MAINS

NOTE: EXACT SIZE AND LOCATION OF SEWER MAINS WILL BE DETERMINED AT TIME OF FINAL ENGINEERING DESIGN. RESIDENTIAL SITE PLANS ARE PRELIMINARY AND SUBJECT TO CHANGE.



ENTRADA COMMUNITY DEVELOPMENT DISTRICT

EXHIBIT 6C

MASTER DRAINAGE PLAN

April 7, 2020

LEGEND

— PROPOSED STORM DRAINAGE PIPES

 STORMWATER POND

NOTE: EXACT SIZE AND LOCATION OF STORM
MAINS WILL BE DETERMINED AT TIME OF FINAL
ENGINEERING DESIGN. RESIDENTIAL SITE PLANS
ARE PRELIMINARY AND SUBJECT TO CHANGE.

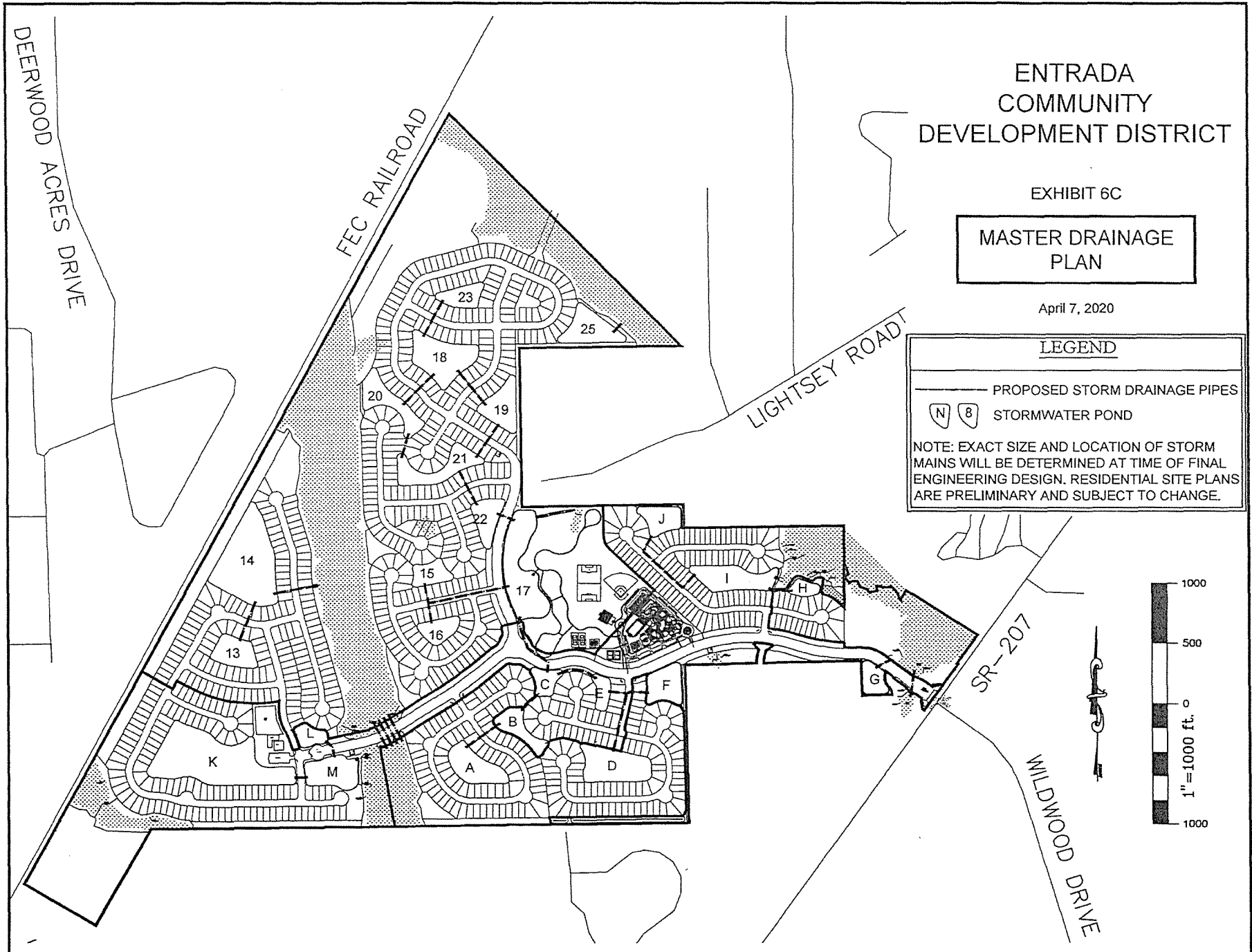


EXHIBIT 7

EXHIBIT "7"

PROPOSED INFRASTRUCTURE PLAN ENTRADA COMMUNITY DEVELOPMENT DISTRICT

FACILITY	CONSTRUCTION	OWNERSHIP	OPERATION MAINTENANCE
Roadways	Developer	CDD	CDD
Water & Wastewater	Developer	SJCUD	SJCUD
Stormwater Management	Developer	CDD	CDD
Landscape/Entranceway	Developer	CDD	CDD
Recreation	CDD	CDD	CDD
Electric and Street Lighting	Developer	FPL	FPL

SJCUD = St. Johns County Utility Department
FPL = Florida Power and Light

Acceptance of any offer of dedication shall be at the sole discretion of the Board of County Commissioners.
Nothing herein shall be construed as affirmative acceptance by the Board of County Commissioners of improvements or acceptance of any operating and maintenance obligations of the District.

EXHIBIT 8

EXHIBIT 8

ESTIMATED COST SUMMARY ENTRADA COMMUNITY DEVELOPMENT DISTRICT

COST ESTIMATE SHEET ENTRADA COMMUNITY DEVELOPMENT DISTRICT

INFRASTRUCTURE COSTS	Current District Costs	Expansion Parcel Costs	Total Costs	Current District Annual Outlay ³	
				2020	2021
1. Clearing and Earthwork	3,116,660	4,906,060	8,022,720	90	10
2. Stormwater Systems	2,545,000	2,409,030	4,954,030	90	10
3. Water and Sewer Utilities ¹	3,492,035	4,716,780	8,208,815	80	20
4. Roadway Improvements	3,615,000	3,582,460	7,197,460	40	60
5. Recreational Improvements ²	4,152,600	241,600	4,394,200	10	90
6. Entry Signage and Landscaping	1,200,000	0	1,200,000	20	80
7. Landscaping, Berm, Fencing, Fountains	395,000	0	395,000	20	80
8. Electric and Street Lighting	777,725	748,200	1,525,925	30	70
9. Engineering, Surveying, Planning, CEI	1,397,270	595,130	1,992,400	90	10
TOTAL COSTS	\$20,691,290		\$37,890,550		

1. Includes all Water, Sewer, Force Main, and Sewage Pump Stations.

2. These estimates contemplate the exercise of the two (2) special powers requested by the Petitioner at this time: (i) Section 190.012(2)(a), *Florida Statutes*, parks and facilities for indoor and outdoor recreational, cultural and educational uses; and (ii) Section 190.012(2)(d), *Florida Statutes*, security, including but not limited to guardhouses, fences and gates, electronic intrusion-detection systems, and patrol cars; improvements also include Amenity Center, Pocket Parks and Mulch Trail.

3. Represents anticipated annual outlay of costs based on anticipated construction timeline.

Note: This exhibit identifies the current intentions of the District and is subject to change based upon various factors such as future development plans or market conditions.

All estimates are 2020 dollars. Recreation cost estimate is based on historical bids for similar work. All other estimated costs are based on existing contracts. This cost summary contemplates the exercise of special powers by the District.

EXHIBIT 9



Rizzetta & Company

STATEMENT OF ESTIMATED REGULATORY COSTS

FOR

PETITION TO ESTABLISH ENTRADA COMMUNITY DEVELOPMENT DISTRICT

March 20, 2020

Prepared by:

Rizzetta & Company
12750 Citrus Park Lane
Suite 115
Tampa, FL 33625
rizzetta.com

ENTRADA COMMUNITY DEVELOPMENT DISTRICT
STATEMENT OF ESTIMATED REGULATORY COSTS

TABLE OF CONTENTS

I.	INTRODUCTION.....	1
1.	PURPOSE AND SCOPE.....	1
2.	ENTRADA COMMUNITY DEVELOPMENT DISTRICT.....	2
II.	STATUTORY ITEMS.....	3
1.	AN ECONOMIC ANALYSIS SHOWING WHETHER THE RULE DIRECTLY OR INDIRECTLY	
A.	IS LIKELY TO HAVE AN ADVERSE IMPACT ON THE ECONOMIC GROWTH.....	5
B.	IS LIKELY TO HAVE AN ADVERSE IMPACT ON BUSINESS COMPETITIVENESS.....	5
C.	IS LIKELY TO INCREASE REGULATORY COSTS.....	6
2.	A GOOD FAITH ESTIMATE OF THE NUMBER OF INDIVIDUALS REQUIRED TO COMPLY.....	6
3.	A GOOD FAITH ESTIMATE OF THE COST TO THE AGENCY OR OTHER GOVERNMENT ENTITIES...	8
4.	A GOOD FAITH ESTIMATE OF THE TRANSACTIONAL COSTS TO BE INCURRED.....	10
5.	AN ANALYSIS OF THE IMPACT ON SMALL BUSINESSES.....	11
6.	ANY ADDITIONAL INFORMATION THAT THE AGENCY DETERMINES MAY BE USEFUL.....	12
7.	A DESCRIPTION OF ANY REGULATORY ALTERNATIVES AND RELATED STATEMENTS.....	13
III	DISCLAIMER.....	13



Rizzetta & Company

Professionals in Community Management

I. INTRODUCTION

1. PURPOSE AND SCOPE

This Statement of Estimated Regulatory Costs has been prepared as a component of the petition filed with the Board of County Commissioners of St. Johns County, Florida, to establish the Entrada Community Development District ("District") in accordance with Chapter 190.005, Florida Statutes ("F.S."). Specifically, Section 190.005(1)(a)8, F.S., requires that, as part of the petition, a Statement of Estimated Regulatory Costs be prepared pursuant to Section 120.541, F.S.

A community development district ("CDD") is established under the Uniform Community Development District Act of 1980, Chapter 190 of the Florida Statutes, as amended (the "Act"). A CDD is a local unit of special-purpose government that is limited to the performance of those specialized functions authorized by the Act. Those specialized functions consist of planning, financing, constructing and maintaining certain public infrastructure improvements and community development services. As an independent special district, the CDD's governing body establishes its own budget and, within the scope of its authorized powers, operates independently of the local general-purpose governmental entity (i.e., a county or city) whose boundaries include the CDD.

However, a CDD cannot regulate land use or issue development orders; those powers reside with the local general-purpose government. The legislature has, in Section 190.004(3), F.S., made this clear by stating:

The establishment of an independent community development district as provided in this act is not a development order within the meaning of chapter 380. All governmental planning, environmental, and land development laws, regulations, and ordinances apply to all development of the land within a community development district. Community development districts do not have the power of a local government to adopt a comprehensive plan, building code, or land development code, as those terms are defined in the Community Planning Act. A district shall take no action which is inconsistent with applicable comprehensive plans, ordinances, or regulations of the applicable local general-purpose government.



Rizzetta & Company

In addition, the parameters for the review and evaluation of community development district establishment petitions are clearly set forth in Section 190.002(2)(d), F.S., as follows:

That the process of establishing such a district pursuant to uniform general law be fair and based only on factors material to managing and financing the service delivery function of the district, so that any matter concerning permitting or planning of the development is not material or relevant.

Therefore, the scope of this Statement of Estimated Regulatory Costs is limited to an evaluation of those factors pertinent to the establishment of a CDD as defined by the legislature and outlined in Section 120.541(2), F.S.

The purpose of Chapter 190, F.S., is to provide another tool to government and private landowners in their efforts to comply with comprehensive plans which require adequate public facilities and services as pre-conditions for future development.

The CDD is a special-purpose unit of local government that is established for the purpose of providing an alternative mechanism for financing the construction of public infrastructure. A CDD must be structured to be financially independent as intended by the legislature. The costs of any additional public improvements to be constructed or any additional services to be provided as a result of this development will either be financed through the District or any other alternative financing methods available for the District in accordance with Florida law. The annual operations and administrative costs of the District will be borne entirely by the District and will not require any subsidy from the State of Florida or the County, nor will it place any additional economic burden on those persons not residing within the District.

2. ENTRADA COMMUNITY DEVELOPMENT DISTRICT

The proposed District will initially encompass approximately 143.98 acres on which DR Horton, Inc. - Jacksonville ("Petitioner") plans to develop a project ("Project"), which currently contemplates approximately 256 single family residential units. However, in the immediate future, the Petitioner may amend the boundaries to include an additional 321.30 acres which, if approved, is expected to contain an additional 765 residential units for a new total of 1,021 residential units.



Rizzetta & Company

The Petitioner is seeking authority, as outlined in Section 190.012, F.S., to establish the District in order to finance, fund, plan, establish, acquire, construct or reconstruct, enlarge or extend, equip, operate and maintain systems, facilities and basic infrastructure that includes, but is not limited to: roadways, utilities, stormwater management, underground electric utility lines, landscape and hardscape, recreational improvements, or any other project, within or outside the boundaries of the District, required by a development order issued by a local government or the subject of an agreement between the District and a governmental entity.

If approved, the District will be authorized to finance these types of infrastructure improvements through special assessment revenue bonds. Repayment of these bonds will be through non-ad valorem assessments levied against all benefited properties within the District. Ongoing operation and maintenance for District-owned facilities is expected to be funded through maintenance assessments levied against all benefited properties within the District.

II. STATUTORY ITEMS:

Section 120.541(2), F.S. (2017), in pertinent part, provides that the elements of a Statement of Estimated Regulatory Costs must contain the following:

(a) *An economic analysis showing whether the rule directly or indirectly:*

- 1. Is likely to have an adverse impact on economic growth, private sector job creation or employment, or private sector investment in excess of \$1 million in the aggregate within 5 years after the implementation of the rule;*
- 2. Is likely to have an adverse impact on business competitiveness, including the ability of persons doing business in the state to compete with persons doing business in other states or domestic markets, productivity, or innovation in excess of \$1 million in the aggregate within 5 years after the implementation of the rule; or*
- 3. Is likely to increase regulatory costs, including any transactional costs, in excess of \$1 million in the*



Rizzetta & Company

ENTRADA COMMUNITY DEVELOPMENT DISTRICT
STATEMENT OF ESTIMATED REGULATORY COSTS

aggregate within 5 years after the implementation of the rule.

(b) A good faith estimate of the number of individuals and entities likely to be required to comply with the rule, together with a general description of the types of individuals likely to be affected by the rule.

(c) A good faith estimate of the cost to the agency, and to any other state and local government entities, of implementing and enforcing the proposed rule, and any anticipated effect on state or local revenues.

(d) A good faith estimate of the transactional costs likely to be incurred by individuals and entities, including local government entities, required to comply with the requirements of the rule. As used in this section, "transactional costs" are direct costs that are readily ascertainable based upon standard business practices, and include filing fees, the cost of obtaining a license, the cost of equipment required to be installed or used or procedures required to be employed in complying with the rule, additional operating costs incurred, the cost of monitoring and reporting, and any other costs necessary to comply with the rule.

(e) An analysis of the impact on small businesses as defined by s. 288.703, and an analysis of the impact on small counties and small cities as defined in s. 120.52. The impact analysis for small businesses must include the basis for the agency's decision not to implement alternatives that would reduce adverse impacts on small businesses.

(f) Any additional information that the agency determines may be useful.

(g) In the statement or revised statement, whichever applies, a description of any regulatory alternatives submitted under paragraph (1)(a) and a statement adopting the alternative or a statement of the reasons for rejecting the alternative in favor of the proposed rule.

The estimated regulatory impact of establishing the District is summarized below. Statutory requirements are **SHOWN IN BOLD CAPS**.



Rizzetta & Company

1. AN ECONOMIC ANALYSIS SHOWING WHETHER THE ORDINANCE DIRECTLY OR INDIRECTLY:

A. IS LIKELY TO HAVE AN ADVERSE IMPACT ON ECONOMIC GROWTH, PRIVATE SECTOR JOB CREATION OR EMPLOYMENT, OR PRIVATE SECTOR INVESTMENT IN EXCESS OF \$1 MILLION IN THE AGGREGATE WITHIN 5 YEARS AFTER THE IMPLEMENTATION OF THE RULE;

Practically, the District, as a "special-purpose" entity, does not have the legal authority or operational ability to adversely impact economic growth, job creation, or investment. The Project and its related permits and entitlements exist independently of the proposed District. The improvements and services proposed to be provided by the District will be required for successful implementation of the Project regardless of whether or not the District is established. However, it is expected that any economic impact would be positive in nature, particularly in the short term. Establishment of the District will enable the anticipated construction of public infrastructure improvements, which will yield a demand for construction labor and professional consultants. Additionally, the District may choose to finance improvements by the issue of special assessment revenue bonds, which may be an attractive investment for investors. Furthermore, establishment would be expected to have a positive impact on property values and local real estate sales. See generally Sections 3(b) and 5 below. Thus, there will be no adverse impact on economic growth, private sector job creation or employment, or private sector investment as a result of the establishment of the District.

B. IS LIKELY TO HAVE AN ADVERSE IMPACT ON BUSINESS COMPETITIVENESS, INCLUDING THE ABILITY OF PERSONS DOING BUSINESS IN THE STATE TO COMPETE WITH PERSONS DOING BUSINESS IN OTHER STATES OR DOMESTIC MARKETS, PRODUCTIVITY, OR INNOVATION IN EXCESS OF \$1 MILLION IN THE AGGREGATE WITHIN 5 YEARS AFTER THE IMPLEMENTATION OF THE RULE;

Any impact on overall business competitiveness and/or innovation resulting from District establishment will presumably be positive in nature. All professional contributors to the creation of the District and anticipated resulting developmental efforts are expected to be either locally or state-based. Once complete, the Project would likely create opportunities for the local real estate industry. Thus, there will be no adverse impact on business competitiveness because of the formation of the proposed District. See generally Section 5 below.



Rizzetta & Company

C. OR IS LIKELY TO INCREASE REGULATORY COSTS, INCLUDING ANY TRANSACTIONAL COSTS, IN EXCESS OF \$1 MILLION IN THE AGGREGATE WITHIN 5 YEARS AFTER THE IMPLEMENTATION OF THE RULE.

A dramatic increase in overall regulatory or transactional costs is highly unlikely. As will be stated in further detail below, the County may incur incidental administrative costs in reviewing the documents germane to the establishment of the District, although these will be recouped by the establishment fee paid to the County.

The District will incur overall operational costs related to services for infrastructure maintenance, landscaping, and similar items. In the initial stages of development, the costs will likely be minimized. These operating costs will be funded by the landowners through direct funding agreements or special assessments levied by the District. Similarly, the District may incur costs associated with the issuance and repayment of special assessment revenue bonds. While these costs in the aggregate may approach the stated threshold over a five year period, this would not be unusual for a Project of this nature and the infrastructure and services proposed to be provided by the District will be needed to serve the Project regardless of the existence of the District. Thus, the District-related costs are not additional development costs. Due to the relatively low cost of financing available to CDD's due to the tax-exempt nature of their debt, certain improvements can be provided more efficiently by the District than by alternative entities. Furthermore, it is important to remember that such costs would be funded through special assessments paid by landowners within the District, and would not be a burden on the taxpayers outside the District. See generally Sections 3 and 4 below.

2. A GOOD FAITH ESTIMATE OF THE NUMBER OF INDIVIDUALS AND ENTITIES LIKELY TO BE REQUIRED TO COMPLY WITH THE ORDINANCE, TOGETHER WITH A GENERAL DESCRIPTION OF THE TYPES OF INDIVIDUALS LIKELY TO BE AFFECTED BY THE ORDINANCE:

The individuals and entities likely to be required to comply with the ordinance or affected by the proposed action (i.e., adoption of the ordinance) can be categorized, as follows: 1) The State of Florida and its residents, 2) the County and its residents, 3) current property owners, and 4) future property owners.



Rizzetta & Company

ENTRADA COMMUNITY DEVELOPMENT DISTRICT
STATEMENT OF ESTIMATED REGULATORY COSTS

a. The State of Florida

The State of Florida and its residents and general population will not incur any compliance costs related to the establishment and on-going administration of the District, and will only be affected to the extent that the State incurs those nominal administrative costs outlined in Section 3(a)(2) below. The cost of any additional administrative services provided by the State as a result of this project will be incurred whether the infrastructure is financed through a CDD or any alternative financing method.

b. St. Johns County

The County and its residents not residing within the boundaries of the District will not incur any compliance costs related to the establishment and on-going administration of the District other than the administrative costs outlined in Section 3(a)(1) below. Once the District is established, these residents will not be affected by adoption of the ordinance. The cost of any additional administrative services provided by the County as a result of this development will be incurred by the District and the District's future residents, whether the infrastructure is financed through a CDD or any alternative financing method.

c. Current Property Owners

The current property owners of the lands within the proposed District boundaries will be affected to the extent that the District allocates debt for the construction of infrastructure and undertakes operation and maintenance responsibility for that infrastructure. However, as a requirement under Section 190.005, F.S., 100 percent of the current landowners within the boundaries of the proposed District have consented to the establishment of the District, and evidence of such has been provided as Exhibit 3 to the Petition.

d. Future Property Owners

The future property owners are those who will own property in the proposed District. These future property owners will be affected to the extent that the District allocates debt for the construction of infrastructure and undertakes operation and maintenance responsibility for that infrastructure.



Rizzetta & Company

3. A GOOD FAITH ESTIMATE OF THE COST TO THE AGENCY, AND TO ANY OTHER STATE AND LOCAL ENTITIES, OF IMPLEMENTING AND ENFORCING THE PROPOSED ORDINANCE, AND ANY ANTICIPATED EFFECT ON STATE AND LOCAL REVENUES:

a. Costs to Governmental Agencies of Implementing and Enforcing the Ordinance

1. St. Johns County ("Agency")

Because the District encompasses less than 2,500 acres, this petition is being submitted to St. Johns County (i.e., the "Agency" under Section 120.541(2), F.S.) for approval in accordance with Section 190.005(2), F.S. The Agency may incur certain administrative costs involved with the review of this petition, although this will be offset by the Petitioner's payment of a one-time filing fee.

Once the District has been established, the Agency will not incur any quantifiable on-going costs resulting from the on-going administration of the District. As previously stated, the CDD will operate independently from the County and all administrative and operating costs incurred by the District relating to the financing and construction of infrastructure are borne entirely by the District. The District will submit, for informational purposes, its annual budget, financial report, audit and public financing disclosures to the Agency. Since there are no legislative requirements for review or action, the Agency should not incur any costs. The Agency may, however, choose to review these documents.

2. State of Florida

Once the District has been established, the State of Florida will incur only nominal administrative costs to review the periodic reports required pursuant to Chapters 190 and 189, F.S. These reports include the annual financial report, annual audit and public financing disclosures. To offset these costs, the legislature has established a maximum fee of \$175 per CDD per year to pay the costs incurred by the Department of Economic Opportunity to administer the reporting requirements



Rizzetta & Company

of Chapter 189, F.S. This amount would be funded by District revenues. Because the District, as defined in Chapter 190, F.S., is designed to function as a self-sufficient special-purpose governmental entity, it is responsible for its own management. Therefore, except for the reporting requirements outlined above, as they may be amended from time to time, no additional burden is placed on the State once the District has been established.

3. The District

The District will incur costs for operations and maintenance of its facilities and for its administration. These costs will be completely paid for from annual assessments levied against all properties within the District benefiting from its facilities and its services.

b. Impact on State and Local Revenues

It is anticipated that approval of this petition will not have any negative effect on state or local revenues. The District is an independent unit of special-purpose government. It is designed to provide community facilities and services to serve the Project. It has its own sources of revenue. No State or local subsidies are required or expected. There is however, the potential for an increase in State sales tax revenue resulting from a stimulated economy although it is not possible to estimate this increase with any degree of certainty. In addition, local ad valorem tax revenues may be increased due to long-lasting increases in property values resulting from the District's construction of infrastructure and on-going maintenance services. Similarly, private development within the District, which will be facilitated by the District's activities, should have a positive impact on property values and therefore ad valorem taxes.

In addition, impact fee and development permit revenue is expected to be generated by private development within the District and, accordingly, should also increase local revenues.

Lastly, some express a concern that a CDD obligation could become a State, County or City obligation thereby negatively affecting State or local revenues. This cannot occur, as Chapter 190 specifically addresses this issue and expressly



Rizzetta & Company

ENTRADA COMMUNITY DEVELOPMENT DISTRICT
STATEMENT OF ESTIMATED REGULATORY COSTS

states: "It is further the purpose and intent of the legislature that no debt or obligation of a district constitutes a burden on any local general-purpose government without its consent." Section 190.002(3), F.S. "A default on the bonds or obligations of a district shall not constitute a debt or obligation of a local general-purpose government or the state." Section 190.016(15), F.S.

In summary, establishing the Entrada Community Development District will not create any significant economic costs for the State of Florida or for the County.

4. **A GOOD FAITH ESTIMATE OF THE TRANSACTIONAL COSTS LIKELY TO BE INCURRED BY INDIVIDUALS AND ENTITIES, INCLUDING LOCAL GOVERNMENT ENTITIES, REQUIRED TO COMPLY WITH THE REQUIREMENTS OF THE ORDINANCE:**

The transactional costs associated with adoption of an ordinance to establish the District are primarily related to the financing of infrastructure improvements. The District will determine what infrastructure it considers prudent to finance through the sale of bonds. The District plans to provide various community facilities and services to serve the properties within the District. An estimate of these facilities and services, along with their estimated costs, are provided below.

**PROPOSED INFRASTRUCTURE PLAN
ENTRADA
COMMUNITY DEVELOPMENT DISTRICT**

FACILITY	CONSTRUCTION	OWNERSHIP	MAINTENACE
Roadways	Developer	CDD	CDD
Water & Wastewater	Developer	SJCUD	SJCUD
Stormwater Mgmt.	Developer	CDD	CDD
Landscape/Entryway	Developer	CDD	CDD
Recreation	CDD	CDD	CDD

SJCUD = St. Johns County Utility Department

Acceptance of any offer of dedication shall be at the sole discretion of the Board of County Commissioners. Nothing herein shall be construed as affirmative acceptance by the Board of County Commissioners of improvements or acceptance of any operating and maintenance obligations of the District.



Rizzetta & Company

ENTRADA COMMUNITY DEVELOPMENT DISTRICT
STATEMENT OF ESTIMATED REGULATORY COSTS

Summary of Estimated Construction Costs for District Public
Infrastructure Improvements

<u>Improvement</u>	<u>Current District Costs</u>	<u>Expansion Parcel Costs</u>	<u>Total</u>
Clearing and Earthwork	\$3,116,660.00	\$4,906,060.00	\$8,022,720.00
Stormwater Systems	\$2,545,000.00	\$2,409,030.00	\$4,954,030.00
Water and Sewer Utilities	\$3,492,035.00	\$4,716,780.00	\$8,208,815.00
Roadway Improvements	\$3,615,000.00	\$3,582,460.00	\$7,197,460.00
Recreational Improvements	\$4,152,600.00	\$241,600.00	\$4,394,200.00
Entry Signage and Landscaping	\$1,200,000.00	\$0.00	\$1,200,000.00
Landscaping, Berm, Fencing, Fountains	\$395,000.00	\$0.00	\$395,000.00
Electric and Street Lighting	\$777,725.00	\$748,200.00	\$1,525,925.00
Engineering, Surveying, Planning, CEI	\$1,397,270.00	\$595,130.00	\$1,992,400.00
Total Estimated Costs	\$20,691,290.00	\$17,199,260.00	\$37,890,550.00

It is important to note that the various costs are typical for developments of the type contemplated here. In other words, there is nothing peculiar about the District's financing estimates for the infrastructure. These costs are not in addition to normal Project costs.

Once the decision is made to issue bonds, it is expected that assessments will be levied against benefited property owners within the proposed District. The revenue generated by payment of these assessments will be used to repay the bonds. The obligation to pay the assessments will "run with the land" and will be transferred to new property owners upon sale of any portions of the property. It should be noted that the District may not fund all of its planned public infrastructure improvements via the issuance of long-term bonds.

To fund the cost of maintaining infrastructure that the District maintains, operation and maintenance assessments may be imposed on the District property owners. As with the special assessments for infrastructure acquisition and construction, the property owner will be responsible for payment of these assessments on the basis of the amount of benefited property owned.

All persons choosing to acquire property in the District will be responsible for such assessments in addition to the taxes or assessments imposed by St. Johns County or other taxing authorities.



Rizzetta & Company

ENTRADA COMMUNITY DEVELOPMENT DISTRICT
STATEMENT OF ESTIMATED REGULATORY COSTS

In exchange for the payment of these special assessments, there are potential benefits to be derived by the future property owners. Specifically, these persons can expect to receive a higher level of services because they, the property owners, will elect the members of the District's Board of Supervisors. Further, the District is limited in jurisdiction and responsibility to this single project. Therefore, the District should be extremely responsive to the needs of the property owners within the District.

5. AN ANALYSIS OF THE IMPACT ON SMALL BUSINESSES AS DEFINED BY S. 288.703, AND AN ANALYSIS OF THE IMPACT ON SMALL COUNTIES AND SMALL CITIES AS DEFINED IN S. 120.52:

Establishing the District should not have any negative impact on small businesses. Any business, large or small, has the option of locating itself in a CDD provided the local governmental authority has issued the appropriate land use approvals. Those that choose this option will be subject to the financial obligations imposed by the District and will accrue the benefits resulting from being in the District.

Furthermore, the District must operate according to Florida's "Sunshine" laws and must follow certain competitive bidding requirements for certain goods and services it will purchase. As a result, small businesses should be better able to compete for District business serving the lands to be included within the District.

A CDD does not discriminate in terms of the size of businesses that can be located within the boundaries or transact business with the CDD.

Establishment of the District should have a positive impact on the small businesses of the local economy. As outlined above, success of the Project should generate increased employment and stimulate economic activity in the area through increased construction expenditures related to infrastructure and private development, thus providing enhanced opportunity for small businesses.

The County is not defined as a small county for purposes of this requirement.

In addition, establishment of a District should not have a negative impact on small cities or counties, because the cost to construct the infrastructure is borne entirely by the property owners within the District.

6. ANY ADDITIONAL INFORMATION THAT THE AGENCY DETERMINES MAY BE USEFUL:



Rizzetta & Company

Certain data utilized in this report was provided by the Petitioner and represents the best information available at this time. Other data was provided by Rizzetta & Company and was based on observations, analysis and experience with private development and other CDD's in various stages of existence.

Finally, it is useful to reflect upon the question of whether the proposed formation of the District is the best alternative to provide community facilities and services to the Project. As an alternative to the District, the County could finance the public infrastructure improvements, either directly or through the use of a County-controlled special taxing or assessment district. However, the County undertaking the implementation of the improvements would naturally have an impact on the finances of the County. Unlike the District, this alternative would require the County to continue to administer the Project and its facilities and services. As a result, the costs for these services and facilities would not be sequestered to the land directly benefiting from them, as the case would be with the District. Additionally, the financing of the Project through the issuance of debt by a County-created district could impact the County's credit rating.

Another alternative to the District would be for the developer to provide the infrastructure and to use a property owners association ("POA") for operations and maintenance of community facilities and services. A District is superior to a POA for a variety of reasons. First, unlike a POA, a District can impose and collect its assessments in the same manner as ad valorem property taxes. Therefore, the District is far more assured of obtaining its needed funds than is a POA. Second, the proposed District is an independent unit of special-purpose government and so it must operate pursuant to Florida's Government-in-the-Sunshine laws and other regulations applicable to public entities. Finally, the District has the ability to issue tax exempt municipal-grade bonds to finance the construction of infrastructure improvements providing for a mechanism to lower the impact of costs

The District also is preferable to these alternatives from a government accountability perspective. With the District as proposed, property owners within the District would have a focused unit of government under their direct control. The District can then be more responsive to property owner needs without disrupting other County responsibilities.

7. A DESCRIPTION OF ANY REGULATORY ALTERNATIVES SUBMITTED AND A STATEMENT ADOPTING THE ALTERNATIVE OR A STATEMENT OF THE REASONS FOR REJECTING THE ALTERNATIVE IN FAVOR OF THE PROPOSED RULE:



Rizzetta & Company

Not applicable.

III. DISCLAIMER:

Rizzetta & Company, Inc., does not represent community development districts as a Municipal Advisor or Securities Broker nor is Rizzetta & Company, Inc., registered to provide such services as described in Section 15B of the Securities and Exchange Act of 1934, as amended. Similarly, Rizzetta & Company, Inc., does not provide community development districts with financial advisory services or offer investment advice in any form.



Rizzetta & Company

EXHIBIT 10

This instrument was prepared by and
upon recording should be returned to:

(This space reserved for Clerk)

Katie S. Buchanan, Esq.
Hopping Green & Sams, P.A.
119 South Monroe Street, Suite 300
Tallahassee, Florida 32301

**CONSENT AND JOINDER TO ESTABLISHMENT
OF A COMMUNITY DEVELOPMENT DISTRICT**

The undersigned is the owner of certain lands more fully described in **Exhibit A** attached hereto and made a part hereof ("Property").

The undersigned understands and acknowledges that D.R. Horton, Inc. – Jacksonville ("Petitioner"), intends to submit an application to establish a community development district in accordance with the provisions of Chapter 190, Florida Statutes.

As the owner of lands which are intended to constitute the community development district, the undersigned understands and acknowledges that pursuant to the provisions of Section 190.005, Florida Statutes, the Petitioner is required to include the written consent to the establishment of the community development district of one hundred percent (100%) of the owners of the lands to be included within the community development district.

The undersigned hereby consents to the establishment of the community development district which will include the Property within the lands to be a part of the community development district and agrees to further execute any documentation necessary or convenient to evidence this consent and joinder during the application process for the establishment of the community development district.

The undersigned acknowledges that the consent will remain in full force and effect until the community development district is established or three years from the date hereof, which ever shall first occur. The undersigned further agrees that it will provide to the next purchaser or successor in interest of all or any portion of the Property a copy of this consent form and obtain, if requested by Petition, a consent to establishment of the community development district in substantially this form.

The undersigned hereby represents and warrants that it has taken all actions and obtained all consents necessary to duly authorize the execution of this consent and joinder by the person executing this instrument.

Executed this 7 day of April, 2020.

Witnessed:

**D.R. HORTON, INC. -
JACKSONVILLE,**
a Delaware corporation

Deborah McClure
Print Name: Deborah McClure

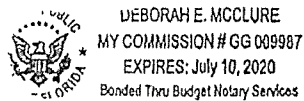
Philip A. Fremento
By: Philip A. Fremento
Its: Vice President

Anna Demizine
Print Name: Anna Demizine

STATE OF FLORIDA
COUNTY OF St. Johns

I hereby certify that on this day, before me, by means of ☒ physical presence or ☐ online notarization, an officer duly authorized to take acknowledgments, personally appeared Philip A. Fremento, as Vice President of D.R. Horton, Inc. - Jacksonville, who executed the foregoing instrument, acknowledged before me that he executed the same on behalf of the foregoing entity and was identified in the manner indicated below.

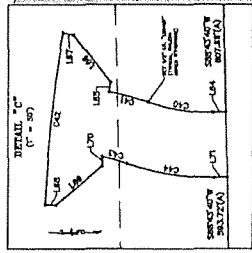
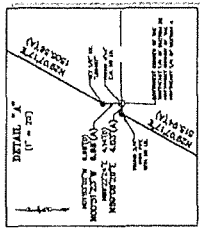
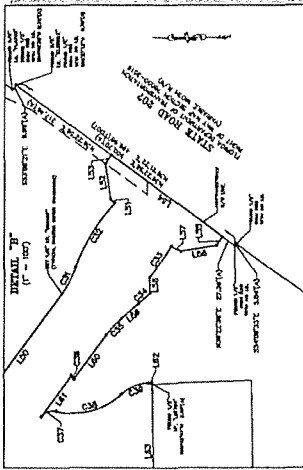
Witness my hand and official seal this 7 day of April, 2020.



Deborah E. McClure
Notary Public

Personally known: X
Produced Identification: _____
Type of Identification: _____

Exhibit A
Property



- SYMBOLS**
- 1 = EASEMENT
 - 2 = EASEMENT
 - 3 = EASEMENT
 - 4 = EASEMENT
 - 5 = EASEMENT
 - 6 = EASEMENT
 - 7 = EASEMENT
 - 8 = EASEMENT
 - 9 = EASEMENT
 - 10 = EASEMENT
 - 11 = EASEMENT
 - 12 = EASEMENT
 - 13 = EASEMENT
 - 14 = EASEMENT
 - 15 = EASEMENT
 - 16 = EASEMENT
 - 17 = EASEMENT
 - 18 = EASEMENT
 - 19 = EASEMENT
 - 20 = EASEMENT
 - 21 = EASEMENT
 - 22 = EASEMENT
 - 23 = EASEMENT
 - 24 = EASEMENT
 - 25 = EASEMENT
 - 26 = EASEMENT
 - 27 = EASEMENT
 - 28 = EASEMENT
 - 29 = EASEMENT
 - 30 = EASEMENT
 - 31 = EASEMENT
 - 32 = EASEMENT
 - 33 = EASEMENT
 - 34 = EASEMENT
 - 35 = EASEMENT
 - 36 = EASEMENT
 - 37 = EASEMENT
 - 38 = EASEMENT
 - 39 = EASEMENT
 - 40 = EASEMENT
 - 41 = EASEMENT
 - 42 = EASEMENT
 - 43 = EASEMENT
 - 44 = EASEMENT
 - 45 = EASEMENT
 - 46 = EASEMENT
 - 47 = EASEMENT
 - 48 = EASEMENT
 - 49 = EASEMENT
 - 50 = EASEMENT
 - 51 = EASEMENT
 - 52 = EASEMENT
 - 53 = EASEMENT
 - 54 = EASEMENT
 - 55 = EASEMENT
 - 56 = EASEMENT
 - 57 = EASEMENT
 - 58 = EASEMENT
 - 59 = EASEMENT
 - 60 = EASEMENT
 - 61 = EASEMENT
 - 62 = EASEMENT
 - 63 = EASEMENT
 - 64 = EASEMENT
 - 65 = EASEMENT
 - 66 = EASEMENT
 - 67 = EASEMENT
 - 68 = EASEMENT
 - 69 = EASEMENT
 - 70 = EASEMENT
 - 71 = EASEMENT
 - 72 = EASEMENT
 - 73 = EASEMENT
 - 74 = EASEMENT
 - 75 = EASEMENT
 - 76 = EASEMENT
 - 77 = EASEMENT
 - 78 = EASEMENT
 - 79 = EASEMENT
 - 80 = EASEMENT
 - 81 = EASEMENT
 - 82 = EASEMENT
 - 83 = EASEMENT
 - 84 = EASEMENT
 - 85 = EASEMENT
 - 86 = EASEMENT
 - 87 = EASEMENT
 - 88 = EASEMENT
 - 89 = EASEMENT
 - 90 = EASEMENT
 - 91 = EASEMENT
 - 92 = EASEMENT
 - 93 = EASEMENT
 - 94 = EASEMENT
 - 95 = EASEMENT
 - 96 = EASEMENT
 - 97 = EASEMENT
 - 98 = EASEMENT
 - 99 = EASEMENT
 - 100 = EASEMENT

NO.	DESCRIPTION	ACRES	DATE
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31
32
33
34
35
36
37
38
39
40
41
42
43
44
45
46
47
48
49
50
51
52
53
54
55
56
57
58
59
60
61
62
63
64
65
66
67
68
69
70
71
72
73
74
75
76
77
78
79
80
81
82
83
84
85
86
87
88
89
90
91
92
93
94
95
96
97
98
99
100

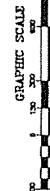
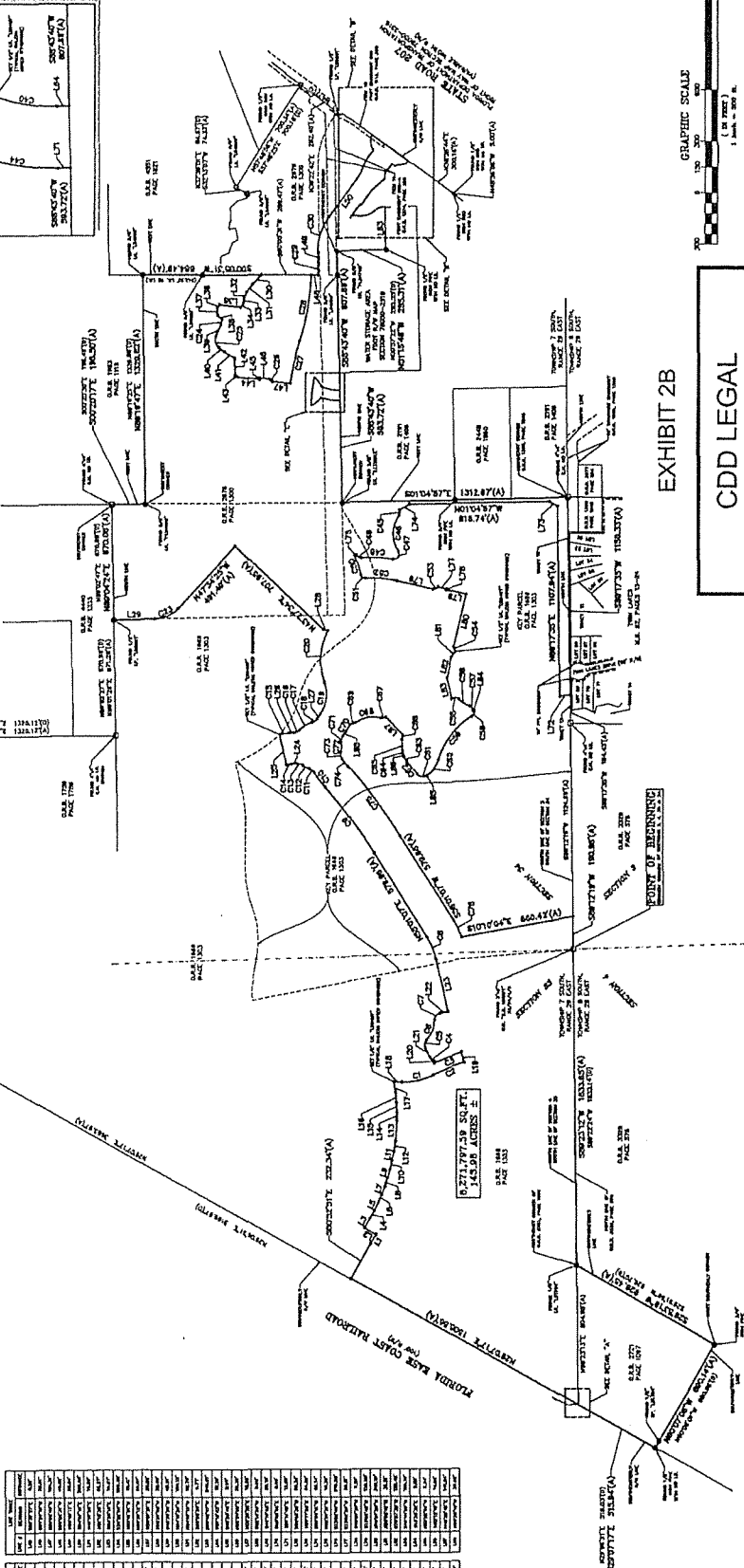


EXHIBIT 2B CDD LEGAL MAP

March 20, 2020

EXHIBIT 11

AUTHORIZATION OF AGENT

This letter shall serve as a designation of Katie S. Buchanan of Hopping Green & Sams, P.A., whose address is 119 S. Monroe Street, Suite 300, Tallahassee, Florida 32301, to act as agent for D.R. Horton, Inc. – Jacksonville with regard to any and all matters pertaining to the Petition to the Board of County Commissioners of St. Johns, Florida, to establish a Community Development District pursuant to Chapter 190, Florida Statutes. The petition is true and correct. This authorization shall remain in effect until revoked in writing.

Witnessed:

D.R. HORTON, INC. - JACKSONVILLE
a Delaware corporation

Deborah McClure

Print Name: Deborah McClure

Philip A. Fremento

Print Name: Philip A. Fremento

Philip A. Fremento

By: Philip A. Fremento
Its: Vice President

STATE OF FLORIDA
COUNTY OF St Johns

I hereby certify that on this day, before me, by means of ☒ physical presence or ☐ online notarization, an officer duly authorized to take acknowledgments, personally appeared Philip A. Fremento as Vice President of D.R. Horton, Inc. – Jacksonville, who executed the foregoing instrument, acknowledged before me that he executed the same on behalf of the foregoing entity and was identified in the manner indicated below.

Witness my hand and official seal in the County of St. Johns and State of Florida this 7 day of April, 2020.



DEBORAH E. MCCLURE
MY COMMISSION # GG 009987
EXPIRES: July 10, 2020
Bonded Thru Budget Notary Services

Deborah E. McClure
Notary Public

Personally known: X
Produced Identification: _____
Type of Identification: _____

PRE-FILE TESTIMONY

**BEFORE THE COUNTY COMMISSION
ST. JOHNS COUNTY, FLORIDA**

IN RE: A Petition to Establish Entrada)
 Community Development District)
 _____)

AFFIDAVIT ADOPTING WRITTEN, PRE-FILED TESTIMONY

STATE OF FLORIDA
COUNTY OF Hillsborough

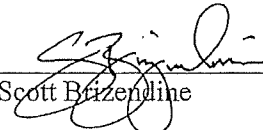
I, Scott Brizendine ("Affiant"), being first duly sworn, do hereby state for my affidavit as follows:

1. I have personal knowledge of the matters set forth in this affidavit.
2. My name is Scott Brizendine and I am employed by Rizzetta & Company, Inc.
3. The prepared written, pre-filed testimony consisting of eight (8) pages, submitted under my name to the County Commission of St. Johns County relating to the Petition to Establish ("Petition") the Entrada Community Development District ("District") and attached hereto, is true and correct.
4. If I were asked the questions contained in the pre-filed testimony orally at the District establishment hearing, my oral answers would be substantially the same as the written answers presented in my pre-filed testimony.
5. My credentials, experience and qualifications concerning my work are accurately set forth in my pre-filed testimony.
6. My pre-filed testimony addresses the various managerial, operational and financial aspects related to the Petition.
7. No corrections or amendments to my pre-filed testimony are required.

Under penalties of perjury, I declare that I have read the foregoing and the facts alleged

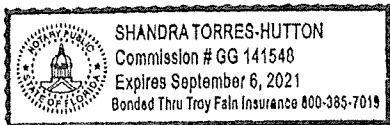
are true and correct to the best of my knowledge and belief.

Executed this 2nd day of July, 2020.



Scott Brizendine

SWORN TO and SUBSCRIBED before me by means of ☒ physical presence or ☐ online notarization, this 2nd day of July, 2020 by the Affiant.



[notary seal]

Shandra Torres-Hutton
(Official Notary Signature)
Name: Shandra Torres-Hutton
Personally Known ☒
OR Produced Identification _____
Type of Identification _____

1 **TESTIMONY OF SCOTT BRIZENDINE FOR THE ESTABLISHMENT**
2 **OF THE ENTRADA COMMUNITY DEVELOPMENT DISTRICT**
3

4 **1. Please state your name and business address.**
5

6 My name is Scott Brizendine. My business address is 12750 Citrus Park Lane, Suite 115,
7 Tampa, Florida 33625.
8

9 **2. By whom are you employed and in what capacity?**
10

11 I am employed by Rizzetta and Company, Inc. as the Manager of District Financial
12 Services. I serve as assessment consultant and accounting manager for community
13 development districts. Previously, I was a District Manager and Associate Director of
14 District Services for Rizzetta and Company, Inc.
15

16 **3. Please briefly summarize your duties and responsibilities.**
17

18 Our company provides management and assessment consulting services to the real estate
19 development industry. We also work with many CDDs.
20

21 **4. Do you work with both public and private sector clients?**
22

23 Yes. I work with a number of public sector clients that include community development
24 districts ("CDD") across the state. I also work with various community associations
25 and other private companies as well.
26

27 **5. Prior to your current employment, by whom were you employed and what were**
28 **your responsibilities in those positions?**
29

30 I was an accountant for a few property management companies responsible for financial
31 statement preparation, bank statement reconciliations, accounts payable processing and
32 accounts receivable reconciliations.
33

34 **6. Please describe your educational background.**
35

36 I have a Bachelor of Science degree in Finance from Florida State University.
37

38 **7. Please describe your work with CDDs in Florida.**
39

40 I have over 15 years of experience in CDD management services, financial consulting
41 services, investment management services and accounting services.
42

43 **8. What has been your role with respect to the proposed Entrada Community**
44 **Development District ("Proposed District") establishment proceeding?**
45

1 I serve as a financial, economic, and management consultant relating to the establishment
2 of the Proposed District. Specifically, I prepared Exhibit 9, the Statement of Estimated
3 Regulatory Costs ("SERC"), of the Petition to Establish the Proposed District
4 ("Petition").
5

6 DISTRICT MANAGEMENT 7

- 8 9. At this point, I will ask you to address certain matters that relate to CDD
9 management. Please describe the general manner in which a CDD actually
10 operates.
11

12 CDDs are governed by a five-member Board of Supervisors ("Board"). These Board
13 members are initially elected by landowners in the CDD. The Board is the governing
14 body of the CDD. The Board employs a district manager, who supervises the district's
15 services, facilities, and administrative functions. The Board annually considers and, after
16 public notice and hearing, adopts a budget. The CDD submits a copy of the proposed
17 budget to the applicable local general-purpose government for review and optional
18 comment prior to its adoption each year.
19

- 20 10. Are there requirements, such as the open meetings and public records laws, imposed
21 upon CDDs in order to safeguard the public that are similar to those imposed upon
22 other general purpose local governments?
23

24 Yes, there are.
25

- 26 11. Please describe these requirements and safeguards.
27

28 It is important to note that the establishment of a CDD does not change any requirements
29 for governmental approval of construction within the CDD. Any land development
30 requirements and all state and local development regulations still apply.
31

32 Members of the Board must be residents of Florida and citizens of the United States.
33 After the Board shifts to being elected by the resident electors of the CDD, the
34 supervisors must also be residents and electors of the CDD. Board members must
35 annually file the same financial disclosure forms required by other local officials.
36

37 Under the Government in the Sunshine laws, all CDD Board meetings are open to the
38 public, and other restrictions are imposed under Chapter 286, *Florida Statutes*. Further,
39 all documents of the CDD are available to the public upon request, in accordance with
40 Florida public records law. Additionally, like other political subdivisions, a CDD is
41 required to send financial reports to the Department of Financial Services. Also, a CDD
42 is audited by an independent certified public accountant every year.
43

44 Finally, to impose special or non-ad valorem assessments under Chapter 170, *Florida*
45 *Statutes*, a CDD must provide published and mailed notice to those who are assessed.

1 That assessment process entails preparation of a methodology that fairly and equitably
2 allocates the cost of the CDD's projects.
3

4 **12. Please describe in general terms how a CDD operates financially, both on a day-to-**
5 **day and a long-term basis.**
6

7 In the early stages, particularly when a CDD is formed in mid-year, the CDD's operating
8 funds may be funded by a "funding agreement" between the CDD and the
9 landowner/developer in lieu of assessments that the CDD might have imposed on
10 property within the CDD.
11

12 In order to provide long term financing of capital projects, CDDs often issue bonds. All
13 bonds issued by CDDs must be secured by a trust agreement, and any bond maturing over
14 a period of more than five years must be validated and confirmed by court decree
15 pursuant to Chapter 75, *Florida Statutes*. The CDD also may borrow funds on a long or
16 short-term basis.
17

18 Debt may be retired by the district through non-ad valorem or special assessments
19 imposed on benefited properties, or rates, fees, and charges imposed on users of CDD
20 facilities and services. By law, debt of the CDD cannot become debt of any other
21 government (city, county or state), without that government's consent.
22

23 **13. What alternatives, other than CDDs, are you familiar with that might be available**
24 **to provide community infrastructure for the lands within the Proposed District?**
25

26 In my opinion there are two alternatives that might provide community infrastructure
27 such as the roads, utilities, drainage, and other improvements contemplated for the
28 Proposed District. First, the general-purpose local government could finance the
29 improvements utilizing special assessments and general funds. Alternatively, the
30 developer could provide infrastructure through private means, including private financing
31 if available. As discussed later in my testimony, neither of these alternatives is preferable
32 to the use of the CDD concept.
33

34 **14. Do you have an opinion, as someone experienced in district management and**
35 **operations, as to whether the Proposed District is the best available alternative for**
36 **delivering community services and facilities to the areas that will be served by the**
37 **Proposed District?**
38

39 Yes. For this project, the Proposed District is the best alternative available for delivering
40 the proposed services and facilities to the area that will be served. These improvements
41 include but are not limited to certain roadway improvements (including
42 landscape/irrigation, hardscape/signage), water and sewer utilities, entry signage and
43 perimeter fencing, stormwater systems and recreational improvements.
44

45 **15. What is the basis for your opinion?**
46

1 Let's look at the alternatives. St. Johns County ("County") could finance the roadway
2 and drainage improvements utilizing special assessments or general funds. The
3 developer and/or a homeowner's association could provide these facilities, as well as the
4 water and sewer facilities, through private financing.
5

6 In evaluating these alternatives, it is important to consider whether the alternative can
7 provide the best focus, can effectively and efficiently manage and maintain the facilities,
8 and whether the alternative can secure low cost, long-term public financing. The County
9 clearly provides the long-term perspective and is a stable and relatively low cost source
10 of financing and provider of services at sustained levels. However, the County has
11 substantial demands over a broad geographical area that places a heavy management
12 delivery load on its staff. In addition, if dependent district financing were used, the
13 County would be responsible for all administrative aspects of the dependent district. By
14 using a dependent district mechanism, the County would be increasing its responsibility
15 and hence liability for the variety of actions that will take place in the Entrada
16 development. By contrast, a CDD can be created to provide focused attention to a
17 specific area in a cost effective manner. It also allows the County to focus staff time,
18 finances, and other resources elsewhere and does not burden the general body of
19 taxpayers in the County with the debt associated with this growth.
20

21 The other alternative is the use of private means – either through a property owner's
22 association or through the developer, or both in combination. This combination can
23 clearly satisfy the high demand for focused service and facilities and managed delivery.
24 However, only a public entity can assure a long-term perspective, act as a stable provider
25 of services and facilities, qualify as a lower cost source of financing and pay for services
26 at sustained levels. Property owners' associations lack the ability to effectively finance
27 these types of improvements. Their ability to assure adequate funds for sustained high
28 levels of maintenance is less than with a CDD.
29

30 Furthermore, neither the developer nor a POA would be required to conduct all actions
31 relating to the provision of these improvements in the "Sunshine" as a CDD must, or
32 abide by other public access requirements that are incumbent upon a CDD and its Board.
33 Also, provision and long term operation and maintenance of these improvements,
34 particularly the recreation and drainage activities, by a CDD ensures that residents have
35 guaranteed access to the body or entity making decisions about these facilities, and in fact
36 will one day sit as the five member Board making the decisions that impact their
37 community directly.
38

39 A CDD is an independent, special-purpose unit of local government designed to focus its
40 attention on providing the best long-term service to its specific benefited properties and
41 residents. It has limited power and a limited area of jurisdiction. The Proposed District
42 will be governed by its own Board and managed by those whose sole purpose is to
43 provide the Proposed District long term planning, management and financing of these
44 services and facilities. This long-term management capability extends to the operation
45 and maintenance of the facilities owned by the Proposed District. Further, the sources for
46 funding and manner of collection of funds will assure that the Proposed District's

1 facilities will be managed at the sustained levels of quality desired by residents well into
2 the future.

- 3
4 **16. As someone experienced in district management, is the area to be included within**
5 **the Proposed District of sufficient size, compactness, and sufficiently contiguous to**
6 **be developable as one functional, interrelated community?**

7
8 Yes. From a management perspective, the area to be included within the Proposed
9 District is of sufficient size, compactness and is sufficiently contiguous to be developable
10 as one functional, interrelated community.

- 11
12 **17. What does the term “functionally interrelated community” mean?**

13
14 Local governments provide developments with the criteria for the elements of
15 infrastructure to provide for the facilities and services, including stormwater drainage,
16 water, sewer, and other facilities and services. Functional unification means that each
17 provided facility and service has a mutual reinforcing relationship to one another, with
18 each facility and service designed to contribute to the development and maintenance of
19 the community as a whole. Each facility and service must meet the growth and
20 development of the community, so a management capability and a funding source are
21 required for each service and facility. Thus, each of these necessary facilities and
22 services must be integrated, unified, and connected into a long-range plan.

- 23
24 **18. What is the basis for your opinion?**

25
26 First, the lands to be included within the Proposed District have sufficient significant
27 infrastructure needs to be developable as a functionally interrelated community. Second,
28 this necessary infrastructure can be provided by the Proposed District in a cost effective
29 manner based upon the specific design of the community. Furthermore, the use of one
30 development plan whose infrastructure is implemented by a CDD to provide the
31 community services and facilities will ensure that the proposed improvements are
32 provided and maintained in an efficient, functional and integrated manner.

33
34 The lands within the Proposed District will initially consist of approximately 143.98
35 acres of land. The purpose of this statutory requirement is to ensure successful and
36 efficient delivery of services and facilities to the property. Based upon my previous
37 experience with special districts, the Proposed District is suitably configured to maximize
38 the timely and cost efficient delivery of the necessary services and facilities.

- 39
40 **19. Do you have an opinion, as someone experienced in district management and**
41 **operations, as to whether the area that will be served by the Proposed District is**
42 **amenable to separate special district government?**

43
44 Yes.
45

1 **20. What is your opinion?**

2

3 The Proposed District is of sufficient size, compactness and contiguity. Therefore, the
4 area to be served by the Proposed District is well suited to separate special district
5 governance.

6

7 **21. What is the basis for your opinion?**

8

9 Two criteria are needed to evaluate a land area as amenable to separate special district
10 government. One, does the land area have need for the facilities and services and will its
11 owners and residents benefit from facilities that the special district could provide? Two,
12 is the land area of sufficient size, sufficient compactness and sufficiently contiguous to be
13 the basis for a functional interrelated community?

14

15 Under both criteria, the Proposed District is a planned community of sufficient size with
16 a need for the facilities and improvements that are presently expected to be provided by
17 the Proposed District. As described in the Petition, the Proposed District will construct
18 and maintain certain needed facilities and services. Other facilities and improvements
19 may be constructed by the Proposed District and ultimately maintained by the City.
20 Based on my experience, CDDs of this size are large enough to effectively provide and
21 manage services. From a management and operations perspective, the land area is well
22 suited to the provision of the proposed services and facilities.

23

24 **22. Do you have an opinion, as someone experienced in district management and**
25 **operations, as to whether the community development services and facilities of the**
26 **Proposed District will be incompatible with the capacity and use of existing local**
27 **and regional community development services and facilities?**

28

29 Yes.

30

31 **23. What is your opinion?**

32

33 The proposed services and facilities of the Proposed District are not incompatible with
34 the capacity and uses of existing local or regional community development services and
35 facilities.

36

37 **24. What is the basis for your opinion?**

38

39 Petitioner presently expects the Proposed District to finance and construct roadway
40 improvements (including landscape/irrigation, hardscape/signage), water and sewer
41 utilities, entry signage and perimeter fencing, stormwater systems and recreational
42 improvements. None of the facilities expected to be provided by the Proposed District
43 presently exist. There will be no overlap or incompatibility because the facilities and
44 improvements expected to be provided by the Proposed District do not exist today.

45

ECONOMICS AND FINANCING

25. Are you familiar with the Petition filed by D.R. Horton, Inc. – Jacksonville (“Petitioner”), to establish the Proposed District?

Yes, I have reviewed the petition and all of the attached exhibits. Specifically, I prepared Petition Exhibit 9 which is the SERC, a requirement of Chapter 190, *Florida Statutes*.

26. Based on your review of Petition Exhibit 9 (Statement of Estimated Regulatory Costs), are there any updates that need to be made at this time?

No updates are necessary at this time.

27. What exactly is a Statement of Estimated Regulatory Costs (“SERC”)?

It is a requirement under Section 120.541(2), *Florida Statutes*, which has been incorporated into the law on establishment of CDDs.

28. In general terms, please summarize the economic analyses presented in the SERC.

An understanding of the SERC requires the recognition of the scope of review and evaluation for the establishment of a CDD as set out in Chapter 190, *Florida Statutes*. Section 190.002(2)(d), *Florida Statutes*, states “that the process of establishing such a district pursuant to uniform general law [must] be fair and based only on factors material to managing and financing the service-delivery function of the district, so that any matter concerning permitting or planning of the development is not material or relevant.” Thus, the scope of the economic analysis included in the SERC addresses only the establishment of the Proposed District, and not the planning or development of the property itself.

The economic analysis sets out the assumptions about the development within the Proposed District and the anticipated infrastructure to be provided by it. The analysis addresses each of the potentially affected parties defined in the statute and evaluates the impact of the Proposed District on each such group.

The Proposed District is a limited and highly specialized unit of local government. It is a special-purpose unit of local government with a single objective: the provision and maintenance of infrastructure and services for a planned new community. Its economic benefits exceed its economic cost to Petitioner, the County, and to all subsequent purchasers and landowners of the community - in short, to all affected parties.

Once the Proposed District is established, there are no direct costs to the County. While the Proposed District will provide certain reports and budgets to the County for its discretionary review, there are no requirements that it incur any obligations or expense associated with its review. In addition, to the extent the Proposed District utilizes the services of the Property Appraiser or Tax Collector under the provisions of Chapter 197,

1 *Florida Statutes*, to collect its assessments the Proposed District must pay the
2 administrative costs associated with those services.
3

4 It is important to note that under Chapter 190, *Florida Statutes*, the debt of the Proposed
5 District cannot become the debt of the County or the State of Florida. Since the Proposed
6 District will be an independent unit of government and will issue its own bonds, the
7 Proposed District will not have any affect on the bonding capacity of the County or the
8 State of Florida.
9

10 **29. Please describe briefly the data and methodology used in preparing the SERC and**
11 **related analyses.**

12
13 The data for the analysis came from the landowner, other experts working on the Petition,
14 and from the Petition itself. The methodology is standard economic impact assessment.
15

16 **30. As a financial consultant, do you have an opinion regarding the financial viability**
17 **and feasibility of the Proposed District?**

18
19 Yes, I do.
20

21 **31. What is that opinion?**

22
23 In my opinion, based on my experience with other CDDs, the Proposed District is
24 expected to be financially viable and feasible.
25

26 **32. The Petition and the SERC identifies future "Expansion Parcels" pursuant to**
27 **Section 190.046(1)(h), Florida Statutes, that may be added to the boundaries of the**
28 **Proposed District within ten (10) years after establishment. If you were asked to**
29 **apply Questions 14 through 24 herein to the Expansion Parcels identified in the**
30 **Petition, would your answers be substantially the same as the answers provided**
31 **above?**

32
33 Yes, they would.
34

35 **33. Does this conclude your testimony?**

36
37 Yes, it does.
38

BEFORE THE COUNTY COMMISSION
ST. JOHNS COUNTY, FLORIDA

IN RE: A Petition to Establish Entrada)
 Community Development District)
 _____)

AFFIDAVIT ADOPTING WRITTEN, PRE-FILED TESTIMONY

STATE OF FLORIDA
COUNTY OF DUVAL

I, Vincent J. Dunn, P.E. ("Affiant"), being first duly sworn, do hereby state for my affidavit as follows:

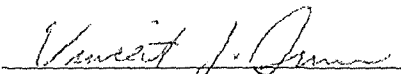
1. I have personal knowledge of the matters set forth in this affidavit.
2. My name is Vincent J. Dunn and I am the President of Dunn & Associates Inc., and a Florida Professional Engineer.
3. The prepared written, pre-filed testimony consisting of nine (9) pages submitted under my name to the County Commission of St. Johns County relating to the Petition to Establish ("Petition") the Entrada Community Development District ("District") and attached hereto, is true and correct.
4. If I were asked the questions contained in the pre-filed testimony orally at the District establishment hearing, my oral answers would be the same as the written answers presented in my pre-filed testimony.
5. My credentials, experience and qualifications concerning land development and the construction of public infrastructure as a professional engineer and related matters are accurately set forth in my pre-filed testimony.

6. My credentials, experience and qualifications concerning land development and the construction of public infrastructure as a professional planner and related matters are accurately set forth in my pre-filed testimony.

7. No corrections or amendments to my pre-filed testimony are required.

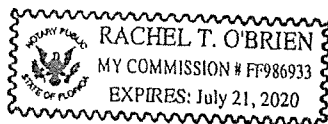
Under penalties of perjury, I declare that I have read the foregoing and the facts alleged are true and correct to the best of my knowledge and belief.

Executed this 6th day of July, 2020.

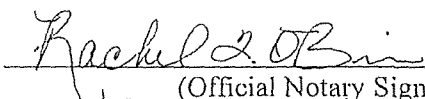


Vincent J. Dunn, P.E.

SWORN TO and SUBSCRIBED before me by means of ☒ physical presence or ☐ online notarization, this 6TH day of JULY, 2020 by the Affiant.



[notary seal]



(Official Notary Signature)
Name: RACHEL T. O'BRIEN
Personally Known YES
OR Produced Identification _____
Type of Identification _____

1 **TESTIMONY OF VINCENT J. DUNN, P.E., FOR THE ESTABLISHMENT**
2 **OF THE ENTRADA COMMUNITY DEVELOPMENT DISTRICT**
3

4 **1. Please state your name and business address.**

5
6 My name is Vincent J. Dunn, P.E. My business address is 8647 Baypine Road, Suite
7 200, Jacksonville, Florida 32256.
8

9 **2. By whom are you employed and in what capacity?**

10
11 I am the President of Dunn & Associates, Inc., and a Florida Professional Engineer.
12

13 **3. Please describe your duties with Dunn & Associates, Inc.**

14
15 Since 1983, I have served as project manager for large master planned communities,
16 large and small residential developments, commercial and office developments and
17 municipal roadway stormwater and recreation projects.
18

19 **4. Please give your educational background, with degrees earned, major areas of study**
20 **and institutions attended.**

21
22 I earned a Bachelor of Science in Civil and Environmental Engineering from Clarkson
23 College of Technology.
24

25 **5. Do you have any professional licenses, registrations or certifications?**

26
27 I am a registered Professional Engineer in the State of Florida. My license number is
28 #39452.
29

30 **6. Are you familiar with the Petition to Establish ("Petition") Entrada Community**
31 **Development District ("Proposed District") filed by D.R. Horton, Inc. – Jacksonville**
32 **("Petitioner")?**

33
34 Yes.
35

36 **7. Have you reviewed the Petition and approved its contents?**

37
38 Yes, I have to the extent that it contains contents that were prepared by me or at my
39 direction.
40

41 **8. What has been your role with respect to the Proposed District's establishment**
42 **proceeding?**

43
44 I reviewed the overall cost estimates prepared by our firm under my direction and the
45 various engineering exhibits that were required for submittal.
46

1 **9. Did you prepare, or have others under your supervision prepare, any of the exhibits**
2 **attached to the Petition?**

3
4 Yes, Exhibits 1, 4A, 5, 6, 7 and 8 were prepared by my firm. Exhibits 2, 4B and 4C
5 (Exhibits 4B and 4C, together with 4A, "Exhibit 4") were prepared by Arc Surveying &
6 Mapping, Inc., which were reviewed in conjunction with Exhibit 4.
7

8 **10. Do any of those Petition exhibits require any change or correction?**

9
10 No changes or corrections are required.
11

12 **11. Are Petition Exhibits 1, 2, 4, 5, 6, 7 and 8 true and correct to the best of your**
13 **knowledge and belief?**

14
15 Yes.
16

17 **12. In general, what do Petition Exhibits 1, 2, 4, 5, 6, 7 and 8 demonstrate?**

18
19 Exhibit 1 is a vicinity map which graphically delineates the general location of the
20 Proposed District.
21

22 Exhibit 2 is a metes and bounds description of the boundaries of the Proposed District.
23

24 Exhibit 4 consists of maps identifying future "Expansion Parcels" and corresponding
25 metes and bounds descriptions for each Expansion Parcel.
26

27 Exhibit 5 is a map which identifies future land uses for the areas within and adjacent to
28 the Proposed District, including the Expansion Parcels.
29

30 Composite Exhibit 6 includes maps that graphically depict the proposed major trunk
31 water mains, sanitary sewer, master drainage, stormwater ponds and outfalls for the lands
32 within the Proposed District.
33

34 Exhibit 7 identifies the types of facilities Petitioner presently expects the Proposed
35 District to finance, construct, acquire or install, as well as the ultimate expected owner
36 and entity responsible for maintenance.
37

38 Exhibit 8 summarizes the estimated costs for constructing, installing or acquiring said
39 facilities and services, including allocation of such costs to the Expansion Parcel.
40

41 **13. Would you generally describe the services and facilities that the Proposed District is**
42 **expected to provide?**

43
44 The Petitioner presently intends for the Proposed District to participate in the acquisition
45 or construction of certain improvements including but are not limited to certain roadway
46 improvements (including landscape/irrigation, hardscape/signage), water and sewer

1 utilities, entry signage and perimeter fencing, stormwater systems and recreational
2 improvements.

- 3
4 **14. Are the construction cost estimates for the proposed facilities, as identified in**
5 **Exhibit 8 for the Proposed District, reasonable?**

6
7 Yes, I have reviewed the construction cost estimates and, to the best of my knowledge,
8 information and belief and based on the information available, the construction cost
9 estimates for the Proposed District are reasonable based on my experience and
10 knowledge of the local construction industry.

- 11
12 **15. Based on your training and experience as a professional engineer, do you have an**
13 **opinion as to whether the Proposed District is of sufficient size, sufficient**
14 **compactness and sufficient contiguity to be developable as a functional interrelated**
15 **community?**

16
17 Yes, I do.

- 18
19 **16. What is your opinion?**

20
21 It is my professional opinion that the Proposed District meets the indicated requirements
22 to be a functional interrelated community because it is of sufficient size, is sufficiently
23 compact and sufficiently contiguous to be developed with infrastructure systems,
24 facilities and services as one functionally interrelated community.

- 25
26 **17. What is the basis for your opinion?**

27
28 First, the lands to be included within the Proposed District have sufficient significant
29 infrastructure needs to be developable as a functionally interrelated community. Second,
30 this necessary infrastructure can be provided by the Proposed District in a cost effective
31 manner based upon the specific design of the community. Furthermore, the use of one
32 development plan whose infrastructure is implemented by a community development
33 district ("CDD") to provide the community services and facilities will ensure that the
34 proposed improvements are provided and maintained in an efficient, functional and
35 integrated manner.

- 36
37 **18. As a professional engineer and planner for this project, do you have an opinion as to**
38 **whether the services and facilities to be provided by the Proposed District will be**
39 **incompatible with the capacities and uses of existing local and regional community**
40 **development facilities and services?**

41
42 My opinion is that the Proposed District will not be incompatible with the capacities and
43 uses of existing local and regional community facilities and services.

- 44
45 **19. What is the basis for your opinion?**
46

1 In order to answer this question, it is necessary to look to the community development
2 services and facilities which will be provided by the Proposed District to the lands within
3 its boundaries and to compare this to the *existing* community development services and
4 facilities presently available to those lands, but currently, the planned infrastructure
5 improvements that the Proposed District plans to provide do not exist on the property.
6

7 There is no duplication or overlap of facilities or services because no other entity or unit
8 of government is presently funding or providing the improvements proposed by the
9 Proposed District. Therefore, the Proposed District will be an efficient entity to
10 participate in the construction and maintenance of the necessary infrastructure
11 improvements.
12

- 13 **20. As a professional engineer and planner for this project, do you have an opinion as to**
14 **whether the area to be included within the Proposed District is amenable to being**
15 **served by separate special district government?**
16

17 Yes. The Proposed District encompasses approximately 143.98 acres. If, in the future,
18 the Proposed District petitions St. Johns County ("County") to amend its boundaries to
19 include the Expansion Parcels and the County approves the same, the amended Proposed
20 District could encompass an additional 321.3 acres, more or less.
21

22 First, land covering of this size is large enough to support its own community with
23 individual facility and service needs. Second, although maintenance of improvements is
24 also a concern, the Proposed District can be utilized as an efficient long-term mechanism
25 to ensure that the residents of the Proposed District pay for and receive proper and
26 required maintenance. Therefore, my opinion is that the area within the Proposed District
27 is amenable to separate special district government.
28

- 29 **21. As a professional engineer and planner for this project, do you have an opinion as to**
30 **whether the Proposed District is the best alternative to provide the proposed**
31 **community development services and facilities to the area that will be served?**
32

33 Yes.
34

- 35 **22. What is your opinion?**
36

37 It is my opinion that the Proposed District is the best alternative to provide the proposed
38 services and facilities within the Proposed District.
39

- 40 **23. What is the basis of your opinion?**
41

42 The Proposed District is a long-term, stable, perpetual entity capable of funding,
43 constructing and, in some cases, maintaining the facilities over the lifetime of the
44 facilities because the Proposed District has the advantage of being a unit of local
45 government, which has access to the tax-exempt bond market. Neither a property
46 owners' nor homeowners' association ("POA"/"HOA") has the ability to finance

1 infrastructure of the nature and scope contemplated here, or manage the construction,
2 acquisition or maintenance of the public infrastructure. Neither is authorized to place a
3 first lien on property if the owner does not pay its maintenance assessments. Overall, the
4 Proposed District would be a more timely, reliable and cost-efficient mechanism to
5 deliver and maintain the needed community improvements.
6

- 7 **24. Can you provide an example of a service or facility and explain why a CDD is a**
8 **preferred alternative for long-term operation and maintenance?**
9

10 Yes. An example would be a stormwater management system. By statute, CDDs and
11 POAs are permitted to operate and maintain these systems. However, POAs are
12 generally required by typical water management district rules to provide significantly
13 more information and documentation before they are authorized to operate and maintain a
14 stormwater management system. Such documentation generally must (i) indicate that the
15 association has the required financial capabilities, (ii) mandate that the association will
16 operate and maintain such systems and (iii) provide that the association cannot be
17 dissolved until another entity is found to maintain the system.
18

19 A CDD, which is generally considered to be a more secure financial, legal and
20 administrative entity, generally must simply provide a letter to the water management
21 district committing that the district will accept operation and maintenance responsibility.
22 All things being equal, a CDD is preferred over a POA/HOA for operation and
23 maintenance of a stormwater management system.
24

- 25 **25. In the course of your work in Florida, have you had an opportunity to work with the**
26 **State Comprehensive Plan found in Chapter 187, *Florida Statutes* ("State**
27 **Comprehensive Plan")?**
28

29 Yes, I have often referred to the State Comprehensive plan in rendering consultation to
30 public and private entities.
31

- 32 **26. In the course of your work in Florida, have you had an opportunity to review local**
33 **government comprehensive plans?**
34

35 Yes.
36

- 37 **27. What types of land development projects have you worked on which involved**
38 **analyzing consistency with the state and local comprehensive plans?**
39

40 I have worked on numerous large master planned communities. I have also helped to
41 review local comprehensive plans, evaluations and appraisals of comprehensive plans,
42 and have assisted with amendments to existing comprehensive plans for several Florida
43 municipalities. All require consistency with comprehensive plans or amendments to
44 change the comprehensive plan so that the development complies with the plan.
45

1 **28. Do you have an opinion, as someone experienced in planning, as to whether the**
2 **establishment of the Proposed District is inconsistent with any applicable element or**
3 **portion of the State Comprehensive Plan?**

4
5 Yes.

6
7 **29. What is that opinion?**

8
9 It is my opinion that the establishment of the Proposed District is not inconsistent with
10 any applicable element or portion of the State Comprehensive Plan.

11
12 **30. What is the basis for that opinion?**

13
14 I have reviewed, from a planning perspective, applicable portions of the State
15 Comprehensive Plan which relate to the establishment of a community development
16 district.

17
18 The State Comprehensive Plan "provides long-range policy guidance for the orderly
19 social, economic, and physical growth of the state." The State Comprehensive Plan sets
20 forth 25 subjects, goals, and numerous policies. Two subjects are particularly relevant,
21 from a planning perspective, to the establishment of the Proposed District: No. 15- Land
22 Use and No. 25- Plan Implementation.

23
24 **31. What is Subject 15 and why is it relevant?**

25
26 Subject 15 recognizes the importance of locating development in areas that have the
27 fiscal abilities and service capacity to accommodate growth. It is relevant because
28 community development districts are designed to provide infrastructure services and
29 facilities in a fiscally responsible manner to the areas which can accommodate
30 development. The Proposed District is not inconsistent with this goal because the
31 Proposed District will have the fiscal capability to provide the specified services and
32 facilities in this growth area. Additionally, under this subject, Policy 1 is relevant.

33
34 **32. What is Policy 1 and why is it relevant?**

35
36 Policy 1 promotes efficient development activities in areas which will have the capacity
37 to service new populations and commerce. The Proposed District will be a vehicle to
38 provide a high quality of infrastructure facilities and services in an efficient and focused
39 manner at sustained levels over the long term life of the community.

40
41 **33. You also mentioned Subject 25. What is this and why is it relevant?**

42
43 This Subject calls for systematic planning capabilities to be integrated into all levels of
44 government throughout the state, with particular emphasis on improving inter-
45 governmental coordination and maximizing citizen involvement. The Proposed District
46 will be able to finance and construct (and operate and maintain) the contemplated

1 infrastructure improvements as authorized under Chapter 190, *Florida Statutes*, subject to
2 and not inconsistent with the local government comprehensive plan and land
3 development regulations. Citizen involvement is maximized since board meetings are
4 publicly advertised, open to the public, and property owners can be involved in the
5 provision of the improvements. Additionally, establishment of the Proposed District will
6 enhance governmental coordination since Section 189.08, *Florida Statutes*, requires the
7 Proposed District to file public facilities reports with the County, and to annually update
8 such reports to the extent there are any changes, which reports and updates the County
9 may rely upon in any revisions to its local comprehensive plan.

10
11 **34. Are there any relevant policies under this subject of the State Comprehensive Plan?**

12
13 Yes, Policies 2, 3, 6 and 8. Policy 2 seeks to ensure that every level of government has
14 the appropriate operational authority to implement the policy directive established in the
15 plan. Chapter 190, *Florida Statutes*, provides the Proposed District with its necessary
16 operational authority. In fact, Section 190.002(1) identifies community development
17 districts as a means to deliver the basic community services and capital infrastructure
18 called for by the Growth Management Act without overburdening other local
19 governments and their taxpayers. The establishment of the Proposed District to provide
20 the infrastructure systems and facilities for the acreage to be included within the
21 Proposed District in a manner which does not burden the general body of taxpayers in the
22 County is directly in furtherance of this Policy.

23
24 Policy 3 provides for establishing effective monitoring, incentive, and enforcement
25 capabilities to see that the requirements established by regulatory programs are met.
26 Section 189.08(2), *Florida Statutes*, requires all independent special districts to submit
27 public facilities reports, including annual updates as to changes. This facilitates an
28 effective monitoring program of the Proposed District by the County. Sections
29 190.002(2)(c), and 190.004(3), *Florida Statutes*, dictate the legislative policy that all
30 community development districts comply with all government laws, rules and regulations
31 applicable to community development. Therefore, establishment of the Proposed District
32 is not inconsistent, and in fact is in furtherance, of this policy.

33
34 Policy 6 encourages citizen participation at all levels of policy development, planning
35 and operations. The Proposed District will hold its meetings in the sunshine pursuant to
36 Chapter 286, *Florida Statutes*. This process encourages citizen participation in, and
37 ultimately citizen control of, the activities of the Proposed District.

38
39 Policy 8 encourages continual cooperation among communities to bring the private and
40 public sectors together for establishing an orderly, environmentally, and economically
41 sound plan for future needs and growth. The Proposed District will be a vehicle to
42 enhance cooperation in the provision of infrastructure between the private sector and the
43 County.

44
45 **35. Are there any other subjects within the State Comprehensive Plan which are**
46 **relevant?**

Two additional subjects applicable to establishment of a CDD include Subject 9 - Natural Systems and Recreational Lands, and Subject 17 - Public Facilities. The applicable policies of Subject 9 relate to expanding state and local efforts to provide activity-based recreational opportunities to urban areas which can be accomplished with the funding assistance of the Proposed District. The applicable goal and policies of Subject 17 relate to: (i) protecting investments in existing public facilities; (ii) providing financing for new facilities; (iii) allocating the costs of new public facilities on the basis of the benefits received by landowners; (iv) implementing innovative but fiscally sound techniques for financing public facilities; and (v) identifying and using stable revenue sources for financing public facilities. The establishment of the Proposed District will further these State Comprehensive Plan, Goals and Policies.

36. You mentioned earlier that you have reviewed local comprehensive plans adopted pursuant to Chapter 163, Florida Statutes. In your work on this project, did you review the effective St. Johns County Local Comprehensive Plan?

Yes, I did.

37. Based upon your experience, do you have an opinion as to whether establishment of the proposed District is inconsistent with any portion or element of the St. Johns County Comprehensive Plan, adopted pursuant to Chapter 163, Florida Statutes?

Yes, I do.

38. What is that opinion?

My opinion is the proposed District is not inconsistent with the County's Comprehensive Plan.

39. What is the basis of your opinion?

First, a community development district is a unit of special-purpose government, and it does not have the authority to make zoning or development permitting decisions that are inconsistent with the comprehensive plan of a unit of general-purpose government, such as the County. Since Chapter 190, *Florida Statutes*, prohibits the Proposed District from taking action that is inconsistent with the County's Comprehensive Plan, the Proposed District will still be required to undergo review and approval for all permitting and construction. Moreover, if established the Proposed District would further some provisions of the County's Comprehensive Plan. Specifically, the following elements of the County's Comprehensive Plan generally relate to and are consistent with the establishment of and exercise of the powers by the Proposed District.

Land Use Element – One stated goal of this element explains that the County's Comprehensive Plan aims to "effectively manage growth and development by designating areas of anticipated future development which satisfy demand where feasible,

1 in a cost-efficient and environmentally acceptable manner.” It further provides as the
2 County’s goal to “encourage and accommodate land uses which make St. Johns County a
3 viable community” and “create a sound economic base and offer diverse opportunities for
4 a wide variety of living, working, shopping and leisure activities [...]” The District can
5 provide the desired services and facilities to this area in accordance with this goal.
6

7 Intergovernmental Coordination Element - One stated goal of this element is to “aid in
8 the provisions of services and management of growth between the County,
9 municipalities, regional, state, and federal entities.” The District will continue to be a
10 vital link in this coordination process as a provider and maintainer of community
11 infrastructure, whose activities are coordinated with and are not inconsistent with plans
12 and activities of related public and private agencies.
13

14 Infrastructure Element – There are numerous goals within this element that support the
15 finding that the District’s proposed facilities and services will not be inconsistent with the
16 County’s Comprehensive Plan. Such goals include but are not limited to providing an
17 efficient system of Stormwater Management and ensuring that adequate facility capacity
18 is available to serve future developments and coordinating the extension of potable water
19 facilities or the increase in capacity of potable water facilities in order to meet future
20 needs. As explained previously, the Proposed District plans to construct, acquire or
21 install and maintain stormwater management facilities consistent with these goals.
22

23 For these reasons, it is my opinion that the establishment of the Proposed District is not
24 inconsistent with any applicable provisions of the County’s Comprehensive Plan.
25

26 40. The Petition identifies future “Expansion Parcels” pursuant to Section
27 190.046(1)(h), Florida Statutes, that may be added to the boundaries of the
28 Proposed District within ten (10) years after establishment. If you were asked to
29 apply Questions 15 through 39 herein to the Expansion Parcels, would your answers
30 be substantially the same as the answers provided above?
31

32 Yes, they would.
33

34 41. Does this conclude your testimony?
35

36 Yes, it does.

**BEFORE THE COUNTY COMMISSION
ST. JOHNS COUNTY, FLORIDA**

IN RE: A Petition to Establish Enclada
Community Development District

AFFIDAVIT ADOPTING WRITTEN, PRE-FILED TESTIMONY

STATE OF FLORIDA
COUNTY OF ST. JOHNS

I, Robert S. Porter, of D.R. Horton, Inc. - Jacksonville ("Affiant"), being first duly sworn,
do hereby state for my affidavit as follows:

1. I have personal knowledge of the matters set forth in this affidavit.
2. My name is Robert S. Porter and I am the Land Manager of D.R. Horton, Inc. – Jacksonville.
3. The prepared written, pre-filed testimony consisting of seven (7) pages, submitted under my name to the County Commission of St. Johns County relating to the establishment of the Entrada Community Development District (“District”) and attached hereto, is true and correct.
4. If I were asked the questions contained in the pre-filed testimony orally at the District establishment hearing my oral answers would be the same as the written answers presented in my pre-filed testimony.
5. My credentials, experience and qualifications concerning the Petition, its exhibits and the reasons for establishing the District are accurately set forth in my pre-filed testimony.
6. My pre-filed testimony addresses the various statutory requirements and an overview of the proposed development within the proposed District.
7. No other corrections or amendments to my pre-filed testimony are required.

Under penalties of perjury, I declare that I have read the foregoing and the facts alleged are true and correct to the best of my knowledge and belief.

Executed this 7th day of July, 2020.

R. S. Porter
Robert S. Porter

SWORN TO and SUBSCRIBED before me by means of ☒ physical presence or ☐ online notarization, this 7 day of July, 2020 by the Affiant.



[notary seal]

DEBORAH E. MCCLURE
MY COMMISSION # 06019967
EXPIRES: July 10, 2020
Bonded Thru Surety/Notary Services

Deborah E. McClure
(Official Notary Signature)
Name: Deborah E. McClure
Personally Known X
OR Produced Identification
Type of Identification _____

1 **TESTIMONY OF ROBERT S. PORTER FOR THE ESTABLISHMENT OF THE**
2 **ENTRADA COMMUNITY DEVELOPMENT DISTRICT**
3

4 **1. Please state your name and business address.**

5
6 My name is Robert S. Porter and my mailing address is 4220 Race Track Road, St. Johns,
7 Florida 32259.
8

9 **2. By whom are you employed and in what capacity?**

10
11 I am the Land Manager of D.R. Horton, Inc. – Jacksonville.
12

13 **3. Briefly summarize your duties and responsibilities.**

14
15 My current duties and responsibilities include overseeing staff responsible for purchasing
16 and developing property for residential construction and sale. I have overseen the
17 development of well over 100 residential developments in the last seventeen years, with
18 many located in and around St. Johns County area.
19

20 **4. Who is the petitioner in this proceeding?**

21
22 The petitioner is D.R. Horton, Inc. - Jacksonville ("Petitioner"), which is the business
23 entity that will supervise the development of the area.
24

25 **5. Are you familiar with the Petition to Establish ("Petition") the Entrada Community**
26 **Development District ("Proposed District") filed by the Petitioner?**

27
28 Yes. I assisted in the formulation of the Petition and accompanying documents and met
29 with members of the consultant team we hired to prepare the filing. I also reviewed the
30 Petition and accompanying documents.
31

32 **6. Are there any changes or corrections to any of the documents attached to the**
33 **Petition at this time?**

34
35 There are no substantive changes needed, other than a minor labeling correction: the
36 surveyor's description for future "Expansion Parcel 3" should be Exhibit 4D, not 4C.
37

38 **7. Please generally describe each of the documents attached to the Petition.**

39
40 The Petition describes the Petitioner's request for establishment of a community
41 development district. Attached to the Petition are the following exhibits:
42

43 Exhibit 1 is a map showing the general location in which the Proposed District is located.
44

45 Exhibit 2 is a metes and bounds description of the boundaries of the Proposed District.
46

1 Exhibit 3 identifies certain future Expansion Parcels (defined herein) that may be added
2 to the boundaries of the Proposed District within 10 years after the establishment.

3
4 Exhibit 4 (consisting of Exhibits 4A, 4B, 4C and 4D) is the general location map and
5 corresponding metes and bounds description of the proposed Expansion Parcels.
6

7 Exhibit 5 is a map which depicts the future general development plan of the Proposed
8 District and the Expansion Parcels with proposed land uses described for areas within the
9 Proposed District.
10

11 Composite Exhibit 6 includes maps that graphically depict the proposed major trunk
12 water mains, sanitary sewer, master drainage, stormwater ponds and outfalls for the lands
13 within the Proposed District.
14

15 Exhibit 7 describes the proposed facilities and services for the Proposed District and the
16 entity that will be responsible to construct, own and maintain the improvements.
17

18 Exhibit 8 is a summary of the estimated costs for constructing, installing or acquiring the
19 facilities and services first described in Exhibit 7.
20

21 Exhibit 9 is the Statement of Estimated Regulatory Costs prepared by Scott Brizendine of
22 Rizzetta & Company, Inc.
23

24 Exhibit 10 consists of landowner consent form executed by the landowner of one-
25 hundred percent (100%) of the lands to be included within the Proposed District.
26

27 Exhibit 11 is an authorization of agent form which authorizes Katie S. Buchanan to act as
28 the agent for the Petitioner during these proceedings.
29

30 **8. Were these documents attached to the Petition prepared by you or under your**
31 **supervision?**

32
33 Yes.
34

35 **9. To the best of your knowledge, is the general location map identified as Exhibit 1 to**
36 **the Petition a true and accurate depiction of the general location of the Proposed**
37 **District?**

38
39 Yes.
40

41 **10. To the best of your knowledge is the metes and bounds description included in**
42 **Exhibit 2 to the Petition a true and accurate recitation of the land area to be**
43 **included within the Proposed District?**

44
45 Yes.
46

- 1 11. To the best of your knowledge, is Exhibit 3 to the Petition a true and accurate
2 identification of the Expansion Parcels that may be added to the boundaries of the
3 Proposed District?
4
5 Yes.
6
- 7 12. To the best of your knowledge, is the general location map and its corresponding
8 metes and bounds description of the Expansion Parcels included as Exhibit 4
9 (consisting of Exhibits 4A, 4B, 4C and 4D) to the Petition a true and accurate
10 depiction of the general location and an accurate recitation of the land area of the
11 Expansion Parcels?
12
13 Yes.
14
- 15 13. To the best of your knowledge, is the map identified as Exhibit 5 to the Petition a
16 true and accurate depiction of the general distribution, location and extent of the
17 public and private, existing and future land uses for the Proposed District?
18
19 Yes.
20
- 21 14. To the best of your knowledge, does Composite Exhibit 6 to the Petition include a
22 true and accurate depiction of the proposed major trunk water mains, sanitary
23 sewer, master drainage, stormwater ponds and outfalls for the lands within the
24 Proposed District?
25
26 Yes.
27
- 28 15. To the best or your knowledge, is Exhibit 7 to the Petition a true and accurate
29 recitation of the types of facilities and services presently expected to be provided
30 within the Proposed District and the Expansion Parcels?
31
32 Yes.
33
- 34 16. To the best of your knowledge, is Exhibit 8 to the Petition a true and accurate
35 recitation of the estimated costs for constructing, installing or acquiring the facilities
36 and services for the Proposed District and the Expansion Parcels?
37
38 Yes.
39
- 40 17. To the best of your knowledge, is Exhibit 9 to the Petition a true and correct copy of
41 the Statement of Estimated Regulatory Cost?
42
43 Yes.
44
- 45 18. To the best of your knowledge, is Exhibit 10 a true and correct copy of Consent and
46 Joinder to the Establishment of the Proposed District obtained from the owner(s) of

1 one hundred percent (100%) of the lands to be included within the proposed District
2 in accordance with Section 190.005, *Florida Statutes*?
3
4 Yes.
5
6 19. To the best of your knowledge, is Exhibit 11 a true and correct copy of the
7 authorization of agent form?
8
9 Yes.
10
11 20. Are you familiar with the area that is to be included within the Proposed District?
12
13 Yes, I am familiar with the general area and the site specifically.
14
15 21. Approximately how large is the Proposed District in acres?
16
17 The Proposed District is located entirely within the limits of the St. Johns County
18 ("County"), Florida, and covers approximately 143.93 acres of land.
19
20 22. What are the "Expansion Parcels"?
21
22 The Expansion Parcels consist of sufficiently contiguous lands that the Petitioner
23 currently anticipates adding to the boundaries of the Proposed District within ten (10)
24 years after the effective date of the ordinance that will create the Proposed District.
25 Section 190.046(1)(h), *Florida Statutes*, specifically allows the Petitioner to include such
26 information. The legal descriptions and acreage of Expansion Parcels, along with the
27 current list of owners of the same, were submitted as Exhibit 3 and Exhibit 4 to the
28 Petition.
29
30 23. Are Consent and Joinder to the Establishment of the Proposed District from the
31 current owners of the Expansion Parcels necessary for the County's review of the
32 establishment petition?
33
34 No; Section 190.046(1)(h), Florida Statutes, only requires the legal description of each
35 additional parcel and its acreage and the current owner of each parcel to be included in
36 the Petition. Furthermore, this Section was generally intended to facilitate the orderly
37 addition of lands to a district in situations where a petitioner anticipates adding additional
38 land to such district at the time it files the petition to establish the same. Once the
39 Proposed District is established and Petitioner is ready to submit a petition to amend its
40 boundaries to include one or more of the Expansion Parcels, the Petitioner would be
41 required at that time to submit executed consent forms from then-owners of the
42 Expansion Parcels.
43
44 24. What steps were taken with respect to filing the Petition with the County
45 Commission of the St. Johns County?
46

1 On April 24, 2020, the Petitioner formally filed the Petition and exhibits with the County
2 by submitting the original to the County Clerk. Accompanying the original Petition was
3 a check in the amount of Sixteen Thousand Three Hundred and Seventy Dollars
4 (\$16,370) made payable to the County. Copies of the Petition were contemporaneously
5 filed with the offices of the County Planning Department, County Administrator and the
6 County Attorney for their respective reviews.
7

8 **25. Who are the five persons designated in the Petition to serve as the initial Board of**
9 **Supervisors?**

10
11 The five persons are Robert Porter, Mark Dearing, Anthony Sharp, James Teagle and
12 John Gislason.
13

14 **26. Do you know each of these persons personally?**

15
16 Yes, I do.
17

18 **27. To the best of your knowledge, are any of the other proposed members of the Board**
19 **of Supervisors of the Proposed District employees, officers or stockholders of the**
20 **Petitioner?**

21
22 Yes, the proposed Board Members are all employed by the Petitioner.
23

24 **28. Are each of the persons designated to serve as the initial Board of Supervisors**
25 **residents of the State of Florida and citizens of the United States?**

26
27 Yes, they are.
28

29 **29. Are there residential units planned for development within the Proposed District?**

30
31 Yes. There are approximately 256 single-family residential units currently planned for
32 development within the Proposed District. However, if the Proposed District later
33 petitions to amend its boundaries to include the Expansion Parcels and the County
34 approves the same, the amended Proposed District is expected to contain an additional
35 765 single-family residential units for a total of 1,021 units.
36

37 **30. Would you please describe the proposed timetable for development of land within**
38 **the Proposed District?**

39
40 The proposed timetable for the construction of infrastructure to develop the land is
41 expected to occur in one (1) phase over an estimated two (2) year period.
42

43 **31. Would you generally describe the services and facilities you currently expect the**
44 **Proposed District to provide?**
45

1 The Petitioner presently intends for the Proposed District to participate in the acquisition
2 or construction of certain improvements including but not limited to certain roadway
3 improvements (including landscape/irrigation, hardscape/signage), water and sewer
4 utilities, entry signage and perimeter fencing, stormwater systems and recreational
5 improvements. Capital costs of these improvements, including associated contingencies
6 and professional fees, will be borne by the Proposed District. The Petitioner's good faith
7 estimation of the costs associated with the acquisition or construction of such
8 improvements is itemized in Exhibit 8 to the Petition.
9

10 Once complete, the water and sewer utility improvements will be owned and maintained
11 by the St. Johns County Utilities Department. Electric utilities and streetlighting serving
12 the Proposed District will be separately financed by the Petitioner, to be owned and
13 operated by Florida Power & Light Company. Other improvements are intended to
14 remain with the District for operation and maintenance.
15

16 **32. In general, what financing methods does the Petitioner propose for the Proposed**
17 **District to pay for the anticipated facilities and services?**
18

19 The Petitioner presently expects that the Proposed District will finance certain services
20 and improvements through the issuance of tax-exempt bonds. The debt issued by the
21 Proposed District is expected to be retired by "non-ad valorem" or "special" assessments
22 on benefitted property within the Proposed District. Ongoing maintenance and
23 operational activities are expected to be funded by maintenance assessments.
24

25 **33. Who will be responsible for paying the Proposed District's assessments?**
26

27 Only property owners within the Proposed District will be responsible for paying
28 assessments. We do not expect the Proposed District to issue general obligation debt
29 which pledges its full faith and credit.
30

31 **34. Will these Proposed District debts be an obligation of the St. Johns County or the**
32 **State of Florida?**
33

34 No. Florida law provides that community development district debt cannot become the
35 obligation of a county, a city, or the state without the consent of that government.
36

37 **35. Why is the Petitioner seeking to have a community development district established**
38 **for this area?**
39

40 According to information provided by the Florida Department of Economic Opportunity,
41 there are more than 700 active community development districts ("CDD(s)") in Florida.
42 CDDs are an efficient, effective way to provide infrastructure and have become accepted
43 in the marketplace of homebuyers.
44

45 From our perspective, the establishment of a CDD is logical for this project. It is a long-
46 term, stable, financially-secure entity. The Proposed District is a structured, formal

1 entity, with the legal ability to respond to future changes in the circumstances and desires
2 of its residents. Under Florida law, the Proposed District has access to the county tax
3 collection mechanisms which helps ensure that the facilities will be maintained. In that
4 sense, to us, it is preferable to a property owners' association.
5

6 Additionally, a CDD has the ability to enter into interlocal agreements with other
7 government entities. These allow a CDD to work with other government entities to
8 complete projects that benefit residents within the CDD boundaries while also assisting
9 local governments in completing infrastructure necessary to serve growth.
10

11 In addition, the Proposed District has the financial capability to assist in the provision of
12 necessary capital improvements sooner than might otherwise be the case. the County,
13 developers, builders and residents will all benefit from these improvements in terms of
14 access, traffic flow, safety, and general property enhancement.
15

16 Additionally, a CDD is the entity preferred by many regulatory agencies, including many
17 water management districts, to operate and maintain the stormwater management and
18 other similar systems. This is because the CDD is a perpetual entity, operating in open
19 meetings, with the financial ability to ensure that the maintenance of these important
20 environmental facilities and amenities is accomplished.
21

22 Given the nature of this project, in my opinion, a CDD is a logical, prudent, and desirable
23 way to ensure this needed infrastructure is maintained.
24

25 **36. Does this conclude your testimony?**
26

27 Yes.
28

THE ST. AUGUSTINE RECORD
Affidavit of Publication

HOPPING GREEN & SAMS
119 S MONROE ST, STE 300
TALLAHASSEE, FL 32301

ACCT: 15693
AD# 0003295775-01
PO#

PUBLISHED EVERY MORNING SUNDAY THROUGH SATURDAY
ST. AUGUSTINE AND ST. JOHNS COUNTY, FLORIDA

STATE OF FLORIDA
COUNTY OF ST. JOHNS

Before the undersigned authority personally appeared MELISSA RHINEHART who on oath says he/she is an Employee of the St. Augustine Record, a daily newspaper published at St. Augustine in St. Johns County, Florida; that the attached copy of advertisement being a **SA Legal Retail** in the matter of **NOTICE OF ESTABLISHMENT HEARING** was published in said newspaper on 08/04/2020, 08/11/2020, 08/18/2020, 08/25/2020.

Affiant further says that the St. Augustine Record is a newspaper published at St. Augustine, in St. Johns County, Florida, and that the said newspaper heretofore has been continuously published in said St. Johns County, Florida each day and has been entered as second class mail matter at the post office in the City of St. Augustine, in said St. Johns County, Florida for a period of one year preceding the first publication of the attached copy of advertisement; and affiant further says the he/she has neither paid nor promised any person, firm or corporation any discount, rebate, commission, or refund for the purpose of securing this advertisement for publication in said newspaper.

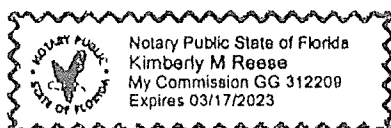
Sworn to (or affirmed) and subscribed before me by means of

☒ physical presence or
☐ online notarization

this ____ day of AUG 25 2020

by *Melissa Rhinehart* who is personally known to
me or who has produced as identification

Kimberly M Reese
(Signature of Notary Public)



AMENDED NOTICE OF PUBLIC HEARING TO CONSIDER AN ORDINANCE ESTABLISHING
THE ENTRADA COMMUNITY DEVELOPMENT DISTRICT

DATE: September 1, 2020
TIME: 9:00 a.m.
LOCATION: County Auditorium, County Administration Building
500 San Sebastian View
St. Augustine, Florida 32084
AND/OR
As a Virtual Public Hearing conducted through
Communications Media Technology pursuant to
Executive Order 20-69 and St. Johns County
Emergency Proclamation 2020-03

Notice is hereby given that the Board of County Commissioners of St. Johns County, Florida ("Board"), will consider the enactment of one County Ordinance granting a petition to establish a community development district to be known as the "Entrada Community Development District" ("District"). The proposed Ordinance title is as follows:

AN ORDINANCE OF THE COUNTY OF ST. JOHNS, STATE OF FLORIDA, ESTABLISHING THE ENTRADA COMMUNITY DEVELOPMENT DISTRICT PURSUANT TO CHAPTER 190, FLORIDA STATUTES; NAMING THE DISTRICT; DESCRIBING THE EXTERNAL BOUNDARIES OF THE DISTRICT; DESCRIBING THE FUNCTIONS AND POWERS OF THE DISTRICT; DESIGNATING FIVE PERSONS TO SERVE AS THE INITIAL MEMBERS OF THE DISTRICT'S BOARD OF SUPERVISORS; PROVIDING FOR A LIMITATION ON COUNTY OBLIGATIONS AND ACCEPTANCE; PROVIDING A SEVERABILITY CLAUSE; AND PROVIDING AN EFFECTIVE DATE.

This notice is an Amended Notice supplementing the prior Notice of Public Hearing to Consider an Ordinance Establishing the Entrada Community Development District, previously published in The Saint Augustine Record on July 7, 14 and 21, 2020.

The petitioner has proposed to establish the District to plan, finance, acquire, construct, operate and maintain infrastructure and community facilities which may be authorized by such District under Florida law, including Chapter 190, *Florida Statutes*. If adopted, the ordinance will establish the District, name its initial Board of Supervisors, describe its functions and powers, and designate the land to be serviced by the District. Specifically, the Board will consider the six factors listed in §190.005(1)(e), *Florida Statutes*. This hearing will afford the affected units of general-purpose local government and the general public a fair and adequate opportunity to appear and present oral and written comments regarding the proposed establishment of the District. The specific legal authority for the establishment of the District is set forth in §190.005, *Florida Statutes*.

The proposed District is located in the unincorporated St. Johns County, Florida, and is generally located south of Lightsey Road, east of Interstate 95 and west of State Road 207 and is anticipated to comprise of approximately 143.98 acres. The proposed boundaries of the District are outlined in the map depicted in this notice.

Copies of this notice, the proposed Ordinance, the petition for establishment, and associated documentation are on file in the Planning and Zoning Section of the Growth Management Department located at the St. Johns County Permit Center, 4040 Lewis Speedway, St. Augustine, Florida 32084, or by e-mail at plandept@sjcfl.us, and may be inspected by interested parties prior to said public hearing. All interested persons and affected units of general-purpose local government shall be given an opportunity to appear at the hearing by methods provided below and present oral or written comments on the petition.

In accordance with Executive Order 20-69, and St. Johns County emergency proclamation 2020-03, this meeting may be conducted remotely, under communication media technology (CMT) without a physical quorum of the members present. CMT means the electronic transmission of printed matter, audio, full motion video, free-frame video, compressed video, and digital video by any method available. CMT being used to conduct the meeting includes Government TV (GTV), phone, and wireless microphone. Should a person wish to submit printed material, it must be submitted a minimum 5 days in advance of this meeting and public hearing. Such printed documentation will be presented at the meeting and public hearing.

A person may attend this CMT meeting by calling the telephone number at (904) 209-1265 and viewing the meeting on [GTV or <http://www.sjcfl.us/GTV/watchgtv.aspx>]. Written or physical documentation may be submitted to the St. Johns County Growth Management Department at 4040 Lewis Speedway, St. Augustine, FL 32084, or e-mail address: plandept@sjcfl.us. A designated access point to this CMT meeting is located at 500 San Sebastian View.

Additional information may be obtained at:
Mailing address: 4040 Lewis Speedway, St. Augustine, Florida 32084
Email address: plandept@sjcfl.us
Phone number: (904) 209-0675

If a person decides to appeal any decision made with respect to any matter considered at such meeting or hearing, he or she will need a record of the proceedings, and for such purpose, he or she may need to ensure that a verbatim record of the proceedings is made, which record includes the testimony and evidence upon which the appeal is to be based. Any evidence, testimony, and argument which is offered utilizing CMT shall be afforded equal consideration as if were offered in person and shall be subject to the same objections.

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

NOTICE TO PERSONS NEEDING SPECIAL ACCOMMODATIONS AND TO ALL HEARING-IMPAIRED PERSONS: In accordance with the

Americans with Disabilities Act, persons needing special accommodations or an interpreter to participate in this proceeding should contact the County's ADA Coordinator at (904) 209-0650 or at the County Administration Building, 500 Sebastian View, St. Augustine, Florida, 32084. Hearing impaired persons, please call the Florida Relay Service (18009558770), no later than five (5) days prior to the meeting.

BOARD OF COUNTY COMMISSIONERS
JEB S. SMITH, CHAIR
ST. JOHNS COUNTY, FLORIDA
File No.: CDD-2020000001 Entrada CDD

ED-000225775-01

0003295775 August 4, 11, 18, 25, 2020

STATE OF FLORIDA DEPARTMENT OF STATE

I, LAUREL M. LEE, Secretary of State of the State of Florida, do hereby certify that the above and foregoing is a true and correct copy of St. Johns County Ordinance No. 2020-42, which was filed in this office on September 4, 2020, pursuant to the provisions of Section 125.66, Florida Statutes, as shown by the records of this office.



Given under my hand and the
Great Seal of the State of Florida
at Tallahassee, the Capitol, this the
9th day of September, A.D., 2020.

Laurel M. Lee

Secretary of State

DSDE 99 (3/03)

The original document has a reflective line mark in paper. Hold at an angle to view when checking.