

## **1.0 Introduction**

### **1.1 Purpose**

This Master Special Assessment Methodology Report (the "Report") was developed to provide a financing plan and a special assessment methodology for the Governors Park South Community Development District (the "District"), located in Clay County, Florida, as related to funding the costs of public infrastructure improvements (the "Capital Improvement Plan") contemplated to be provided by the District.

### **1.2 Scope of the Report**

This Report presents the projections for financing the District's Capital Improvement Plan (the "CIP") described in the Report of District Engineer developed by England, Thims and Miller, Inc. (the "District Engineer") dated August 6, 2024 (the "Engineer's Report"), as well as describes the method for the allocation of special benefits and the apportionment of special assessment debt resulting from the provision and funding of the CIP.

### **1.3 Special Benefits and General Benefits**

Improvements undertaken and funded by the District as part of the CIP create special and peculiar benefits, different in kind and degree than general benefits, for properties within its borders as well as general benefits to the public at large. However, as discussed within this Report, these general benefits are incidental in nature and are readily distinguishable from the special and peculiar benefits which accrue to property within the District. The District's CIP enables properties within its boundaries to be developed.

There is no doubt that the general public and property owners of property outside the District will benefit from the provision of the CIP. However, these benefits are only incidental since the CIP is designed solely to provide special benefits peculiar to property within the District. Properties outside the District are not directly served by the CIP and do not depend upon the CIP to obtain or to maintain their development entitlements. This fact alone clearly distinguishes the special benefits which District properties receive compared to those lying outside of the District's boundaries.

The CIP will provide public infrastructure improvements which are all necessary in order to make the lands within the District developable and saleable. Even though the exact value of the benefits provided

by the CIP is hard to estimate at this point, it is nevertheless greater than the costs associated with providing the same.

#### **1.4 Organization of the Report**

*Section Two* describes the development program as proposed by the Developer, as defined below.

*Section Three* provides a summary of the CIP as determined by the District Engineer.

*Section Four* discusses the financing program for the District.

*Section Five* introduces the special assessment methodology for the District.

### **2.0 Development Program**

#### **2.1 Overview**

The District will serve the Governors Park South development, a master planned mixed use development located in Clay County, Florida. The land within the District presently consists of approximately 2,045.00 +/- acres and is generally located northwest of US-17S, west of CR-15A and south of CR-16A. Please note that the District is in the process of amending its boundaries to remove approximately 185.00 +/- acres from its boundaries, and after the successful conclusion of such boundary amendment, the boundaries of the District are expected to consist of approximately 1,860.00 +/- acres.

#### **2.2 The Development Program**

The development of Governors Park South is anticipated to be conducted by Governors Park Property Holdings, LLC (the "Developer"). Based upon the information provided by the Developer and the Engineer, the current development plan envisions a total of 114 Townhomes, 1,776 Single-family 50' units, 824 Single-family 60' units for a total of 2,714 residential units, although land use types and unit numbers may change throughout the development period and a supplemental or amended methodology would be adopted to adjust and address such changes in unit types and numbers. Table 1 in the *Appendix* illustrates the development plan for Governors Park South. The development of Governors Park South is

anticipated to be conducted in one or more phases over a multi-year period.

### **3.0 The Capital Improvement Plan**

#### **3.1 Overview**

The public infrastructure costs to be funded by the District are described by the District Engineer in the Engineer's Report. Only public infrastructure that may qualify for bond financing by the District under Chapter 190, Florida Statutes and under the Internal Revenue Code of 1986, as amended, was included in these estimates.

#### **3.2 Capital Improvement Plan**

The CIP needed to serve the Development is projected to consist of both master and neighborhood improvements which will serve all of the lands in the District. The master infrastructure portion of the CIP will consist of C.R. 15A roadway improvements, GCSB from CR – 15A to US – 17, GCSB (4-lane roadway), 4-lane collector, 2-lane collector, master off-site utility improvements, master on-site utility improvements, underground electric, sewage pump stations, wetland mitigation, amenity center, stormwater management, flood control, and groundwater control, hardscape, landscape, irrigation, fencing, signage, and entry feature, along with professional fees and contingency. The neighborhood infrastructure portion of the CIP will consist of water distribution system, reclaimed water distribution system, sewer collection system, neighborhood roadways, drainage collection system, and stormwater management facilities, along with professional fees and contingency. At the time of this writing, the total cost of the CIP is estimated to total approximately \$348,390,246.

The infrastructure improvements that comprise the CIP will serve and provide benefit to all land uses in the District and will comprise an interrelated system of improvements, which means all of the improvements will serve the entire District and improvements will be interrelated such that they will reinforce one another.

Tables 2A, 2B, and 2C in the *Appendix* illustrate the specific components of the CIP.

### **4.0 Financing Program**

## 4.1 Overview

As noted above, the District is embarking on a program of capital improvements which will facilitate the development of lands within the District. Generally, construction of public improvements is either funded by the Developer and then acquired by the District or funded directly by the District. As of the time of writing of this Report, the District will most likely construct improvements, although the District maintains the complete flexibility to either acquire the public infrastructure from the Developer or construct it, or even partly acquire it and partly construct it.

Even though the actual financing plan may change to include multiple series of bonds, it is likely that in order to fully fund costs of the CIP as described in *Section 3.2* in two financing transactions, the District would have to issue approximately \$483,785,000 in par amount of special assessment bonds (the "Bonds").

**Please note that the purpose of this Report is to allocate the benefit of the CIP to the various land uses in the District and based on such benefit allocation to apportion the maximum debt necessary to fund the CIP. The discussion of the structure and size of the indebtedness is based on various estimates and is subject to change.**

## 4.2 Types of Bonds Proposed

The proposed financing plan for the District provides for the issuance of the Bonds in the approximate principal amount of \$483,785,000 to finance approximately \$348,390,246 in CIP costs. The Bonds as projected under this financing plan would be structured to be amortized in 30 annual installments following a 24-month capitalized interest period. Interest payments on the Bonds would be made every May 1 and November 1, and principal payments on the Bonds would be made either on May 1 or on November 1.

In order to finance the improvement and other costs, the District would need to borrow more funds and incur indebtedness in the total amount of approximately \$483,785,000. The difference is comprised of funding a debt service reserve, capitalized interest, underwriter's discount and costs of issuance for each series of Bonds. Preliminary sources and uses of funding for the Bonds are presented in Table 3 in the *Appendix*.

Please note that the structure of the Bonds as presented in this Report is preliminary and may change due to changes in the development program, market conditions, timing of infrastructure

installation as well as for other reasons. The District maintains complete flexibility as to the structure of the Bonds and reserves the right to modify it as necessary.

## **5.0 Assessment Methodology**

### **5.1 Overview**

The issuance of the Bonds provides the District with funds necessary to construct/acquire the infrastructure improvements which are part of the CIP outlined in *Section 3.2* and described in more detail by the District Engineer in the Engineer's Report. These improvements lead to special and general benefits, with special benefits accruing to the assessable properties within the boundaries of the District and general benefits accruing to areas outside the District but being only incidental in nature. The debt incurred in financing the public infrastructure will be secured by assessing properties that derive special and peculiar benefits from the CIP. All properties that receive special benefits from the CIP will be assessed for their fair share of the debt issued in order to finance all or a portion of the CIP.

### **5.2 Benefit Allocation**

The most current development plan envisions the development of 114 Townhomes, 1,776 Single-family 50' units, 824 Single-family 60' units for a total of 2,714 residential units, although unit numbers and land use types may change throughout the development period and a supplemental or amended methodology would be adopted to adjust and address such changes in unit types and numbers.

The infrastructure improvements that comprise the CIP will serve and provide benefit to all land uses in the District and will comprise an interrelated system of improvements, which means all of improvements will serve the entire District and improvements will be interrelated such that they will reinforce one another.

By allowing for the land in the District to be developable, both the improvements that comprise the CIP and their combined benefit will be greater than the sum of their individual benefits. All of the land uses within the District will benefit from each infrastructure improvement category, as the improvements provide basic infrastructure to all land within the District and benefit all land within the District as an integrated system of improvements.

As stated previously, the public infrastructure improvements included in the CIP have a logical connection to the special and peculiar

benefits received by the land within the District, as without such improvements, the development of the properties within the District would not be possible. Based upon the connection between the improvements and the special and peculiar benefits to the land within the District, the District can assign or allocate a portion of the District's debt through the imposition of non-ad valorem assessments, to the land receiving such special and peculiar benefits. Even though these special and peculiar benefits are real and ascertainable, the precise amount of the benefit cannot yet be calculated with mathematical certainty. However, such benefit is more valuable than the cost of, or the actual non-ad valorem assessment amount levied on that parcel.

The benefit associated with the CIP of the District is proposed to be allocated to the different unit types within the District in proportion to the density of development as measured by a standard unit called an Equivalent Residential Unit ("ERU"). Table 4 in the *Appendix* illustrates the ERU weights that are proposed to be assigned to the unit types contemplated to be developed within the District based on the relative density of development, the total ERU counts for each unit type, and the share of the benefit received by each unit type.

The rationale behind different ERU weights is supported by the fact that generally and on average, smaller and less intensely economically utilized land uses will, on a per unit/square foot basis, use and benefit from the public infrastructure improvements comprising the CIP less than larger units and more intensely economically utilized land uses. For instance, generally and on average smaller units and less intensely economically utilized land uses will, on a per unit/square foot basis, produce fewer vehicular trips, less storm water runoff, and need less water/sewer capacity than larger units and more intensely economically utilized land uses. As the exact amount of the benefit and appreciation is not possible to be calculated at this time, the use of ERU measures serves as a reasonable approximation of the relative amount of benefit received from the CIP.

Please note that the some or all of the neighborhood infrastructure costs may be funded by bonds and split and assessed among separate neighborhoods depending on the financing structure and developer/builder contributions of infrastructure.

Tables 5A, 5B, and 5C in the *Appendix* present the apportionment of the assessment associated with funding the District's CIP (the "Assessment") in accordance with the ERU benefit allocation method

presented in Table 4. Tables 5A, 5B, and 5C also present the annual levels of the projected annual debt service assessments per unit.

### **5.3 Assigning Debt**

As the land in the District has not yet received development approval for its intended final use and the precise location of the various product types by lot or parcel is unknown, the Assessment will initially be levied on all of the land in the District on an equal pro-rata gross acre basis and thus the total bonded debt in the amount of \$483,785,000 will be preliminarily levied on approximately 1,860.00 +/- gross acres expected to be in the boundaries of the District after the successful conclusion of the boundary amendment referred to in Section 2.1, at a rate of \$154,452.74 per acre.

As the land receives development approval, the Assessment will be allocated to each parcel on a first received development approval-first assigned basis based on the planned use for that parcel as reflected in Tables 5A, 5B, and 5C in the *Appendix*. Such allocation of Assessments to parcels which received development approval will reduce the amount of Assessment levied on gross acres which did not receive development approval within the District.

Further, to the extent that any land which land which did not receive development approval (the "Transferred Property") is sold to a third party not affiliated with the Developer, the Assessment will be assigned to such parcel will be assigned to such Transferred Property at the time of the sale based on the maximum total number of ERUs assigned by the Developer to that Transferred Property, subject to review by the District's methodology consultant, to ensure that any such assignment is reasonable, supported by current development rights and plans, and otherwise consistent with this Report. The owner of the Transferred Property will be responsible for the total Assessment applicable to the Transferred Property, regardless of the total number of ERUs that ultimately received development approval. These total Assessments are fixed to the Transferred Property at the time of the sale. If the Transferred Property subsequently received a modification of its development approval, the total Assessment initially allocated to the Transferred Property will be re-allocated to the parcel/parcels which received a modification of its development approval pursuant to the methodology as described herein (i.e. equal assessment per acre until development approval).

#### **5.4 Lienability Test: Special and Peculiar Benefit to the Property**

As first discussed in *Section 1.3*, Special Benefits and General Benefits, improvements undertaken by the District create special and peculiar benefits to the assessable properties within the District. The District's improvements benefit assessable properties within the District and accrue to all such assessable properties on an ERU basis.

Improvements undertaken by the District can be shown to be creating special and peculiar benefits to the assessable property within the District. The special and peculiar benefits resulting from each improvement include, but are not limited to:

- a. added use of the property;
- b. added enjoyment of the property;
- c. decreased insurance premiums;
- d. increased marketability and value of the property.
- e. increased future appreciation.

The improvements which are part of the CIP make the land in the District developable and saleable and when implemented jointly as parts of the CIP, provide special and peculiar benefits which are greater than the benefits of any single category of improvements. These special and peculiar benefits are real and ascertainable, but not yet capable of being calculated and assessed in terms of numerical value; however, such benefits are more valuable than either the cost of, or the actual assessment levied for, the improvement or debt allocated to the parcel of land.

#### **5.5 Lienability Test: Reasonable and Fair Apportionment of the Duty to Pay**

A reasonable estimate of the proportion of special and peculiar benefits received from the improvements is delineated in Table 4 (expressed as ERU factors) of the *Appendix*.

The apportionment of the assessments is fair and reasonable because it was conducted on the basis of consistent application of the methodology described in *Section 5.2* across all assessable property within the District according to reasonable estimates of the special and peculiar benefits derived from the CIP by different unit types.

#### **5.6 True-Up Mechanism**

The District's assessment program is predicated on the development of lots in a manner sufficient to include all of the planned ERUs as



set forth in Table 1 in the Appendix (“Development Plan”). At such time as lands are to be platted (or re-platted) or site plans are to be approved (or re-approved), the plat or site plan (either, herein, “Proposed Plat”) shall be presented to the District for a “true-up” review as follows:

a. If a Proposed Plat results in the same amount of ERUs (and thus Bond Assessments) able to be imposed on the “Remaining Unplatted Lands” (i.e., those remaining unplatted lands after the Proposed Plat is recorded) as compared to what was originally contemplated under the Development Plan, then the District shall allocate the Bond Assessments to the product types being platted and the remaining property in accordance with this Report, and cause the Bond Assessments to be recorded in the District’s Improvement Lien Book.

b. If a Proposed Plat results in a greater amount of ERUs (and thus Bond Assessments) able to be imposed on the Remaining Unplatted Lands as compared to what was originally contemplated under the Development Plan, then the District may undertake a pro rata reduction of Bond Assessments for all assessed properties within the District, or may otherwise address such net decrease as permitted by law.

c. If a Proposed Plat results in a lower amount of ERUs (and thus Bond Assessments) able to be imposed on the Remaining Unplatted Lands as compared to what was originally contemplated under the Development Plan, then the District shall require the landowner(s) of the lands encompassed by the Proposed Plat to pay a “True-Up Payment” equal to the difference between: (i) the Bond Assessments originally contemplated to be imposed on the lands subject to the Proposed Plat, and (ii) the Bond Assessments able to be imposed on the lands subject to the Proposed Plat, after the Proposed Plat (plus applicable interest, collection costs, penalties, etc.).

With respect to the foregoing true-up analysis, the District’s Assessment Consultant, in consultation with the District Engineer, District Counsel and the District’s Bond Counsel, shall determine in his or her sole discretion what amount of ERUs (and thus Bond Assessments) are able to be imposed on the Remaining Unplatted Lands, taking into account a Proposed Plat, by reviewing: a) the original, overall development plan showing the number and type of units reasonably planned for the Development, b) the revised, overall development plan showing the number and type of units reasonably planned for the Development, c) proof of the amount of entitlements

for the Remaining Unplatted Lands, d) evidence of allowable zoning conditions that would enable those entitlements to be placed in accordance with the revised development plan, and e) documentation that shows the feasibility of implementing the proposed development plan. Prior to any decision by the District not to impose a true-up payment, a supplemental methodology shall be produced demonstrating that there will be sufficient Bond Assessments to pay debt service on the applicable series of bonds and the District will conduct new proceedings under Chapters 170, 190 and 197, Florida Statutes upon the advice of District Counsel.

Any True-Up Payment shall become due and payable that tax year by the landowner of the lands subject to the Proposed Plat, shall be in addition to the regular Bond Assessment installment payable for such lands, and shall constitute part of the Bond Assessment liens imposed against the Proposed Plat property until paid. A True-Up Payment shall include accrued interest on the applicable bond series to the interest payment date that occurs at least 45 days after the True-Up Payment (or the second succeeding interest payment date if such True-Up Payment is made within forty-five (45) calendar days before an interest payment date (or such other time as set forth in the supplemental indentures for the applicable bond series)).

All Bond Assessments levied run with the land, and such Bond Assessment liens include any True-Up Payments. The District will not release any liens on property for which True-Up Payments are due, until provision for such payment has been satisfactorily made. Further, upon the District's review of the final plat for the developable acres, any unallocated Bond Assessments shall become due and payable and must be paid prior to the District's approval of that plat. This true-up process applies for both plats and/or re-plats.

Such review shall be limited solely to the function and the enforcement of the District's Bond Assessment liens and/or true-up agreements. Nothing herein shall in any way operate to or be construed as providing any other plat approval or disapproval powers to the District. For further detail on the true-up process, please refer to the True-Up Agreement and applicable assessment resolution(s).

## **5.7 Assessment Roll**

The Assessment of \$483,785,000 is proposed to be levied over the area described in Exhibit "A". Excluding any capitalized interest period, debt service assessments shall be paid in thirty (30) annual principal installments.

## 6.0 Additional Stipulations

### 6.1 Overview

Wrathell, Hunt and Associates, LLC was retained by the District to prepare a methodology to fairly allocate the special assessments related to the District's CIP. Certain financing, development and engineering data was provided by members of District Staff and/or the Developer. The allocation Methodology described herein was based on information provided by those professionals. Wrathell, Hunt and Associates, LLC makes no representations regarding said information transactions beyond restatement of the factual information necessary for compilation of this report. For additional information on the Bond structure and related items, please refer to the Offering Statement associated with this transaction.

**Wrathell, Hunt and Associates, LLC does not represent the District as a Municipal Advisor or Securities Broker nor is Wrathell, Hunt and Associates, LLC registered to provide such services as described in Section 15B of the Securities and Exchange Act of 1934, as amended. Similarly, Wrathell, Hunt and Associates, LLC does not provide the District with financial advisory services or offer investment advice in any form.**

## 7.0 Appendix

Table 1

### Governors Park South Community Development District

Development Plan

Land Use	Total Number of Residential Units
Townhomes	114
Single-family 50'	1,776
Single-family 60'	824
<b>Total</b>	<b>2,714</b>

Table 2A

### Governors Park South Community Development District

Capital Improvement Plan (CIP) - Master Infrastructure

Improvement	Master Off-site Infrastructure	Master On-site Infrastructure	Total Estimated Cost
C.R. 15A Roadway Improvements	\$2,000,000.00	\$0.00	\$2,000,000.00
GCSB from CR - 15A to US - 17	\$5,500,000.00	\$0.00	\$5,500,000.00
GCSB (4-Lane Roadway)	\$0.00	\$15,492,500.00	\$15,492,500.00
4-Lane Collector	\$0.00	\$6,287,500.00	\$6,287,500.00
2-Lane Collector	\$0.00	\$26,120,000.00	\$26,120,000.00
Master Off-site Utility Improvements	\$3,354,000.00	\$0.00	\$3,354,000.00
Master On-site Utility Improvements	\$0.00	\$17,180,300.00	\$17,180,300.00
Underground Electric	\$220,000.00	\$350,000.00	\$570,000.00
Sewage Pump Stations	\$0.00	\$13,750,000.00	\$13,750,000.00
Wetland Mitigation	\$0.00	\$5,060,000.00	\$5,060,000.00
Amenity Center	\$0.00	\$5,500,000.00	\$5,500,000.00
Stormwater Management, Flood Control, and Groundwater Control	\$0.00	\$28,000,000.00	\$28,000,000.00
Hardscape, Landscape, Irrigation, Fencing, Signage and Entry Feature	\$2,100,000.00	\$19,000,000.00	\$21,100,000.00
Planning, Engineering, Survey, and Regulatory (15%)	\$1,976,100.00	\$20,511,045.00	\$22,487,145.00
Contingency (20%)	\$3,030,020.00	\$31,450,269.00	\$34,480,289.00
<b>Total</b>	<b>\$18,180,120.00</b>	<b>\$188,701,614.00</b>	<b>\$206,881,734.00</b>

Table 2B

## Governors Park South

### Community Development District

Capital Improvement Plan (CIP) - Neighborhood Infrastructure

Improvement	Total Estimated Cost
<b>Townhomes</b>	
- Water Distribution System	\$ 361,152.00
- Reclaimed Water Distribution System	\$ 361,152.00
- Sewer Collection System	\$ 601,920.00
- Neighborhood Roadways	\$ 902,880.00
- Drainage Collection System	\$ 451,440.00
- Stormwater Management Facilities	\$ 331,056.00
<b>Single-family 50' Units</b>	
- Water Distribution System	\$ 7,672,320.00
- Reclaimed Water Distribution System	\$ 7,672,320.00
- Sewer Collection System	\$ 12,787,200.00
- Neighborhood Roadways	\$ 19,180,800.00
- Drainage Collection System	\$ 9,590,400.00
- Stormwater Management Facilities	\$ 7,032,960.00
<b>Single-family 60' Units</b>	
- Water Distribution System	\$ 4,271,616.00
- Reclaimed Water Distribution System	\$ 4,271,616.00
- Sewer Collection System	\$ 7,119,360.00
- Neighborhood Roadways	\$ 10,679,040.00
- Drainage Collection System	\$ 5,339,520.00
- Stormwater Management Facilities	\$ 3,915,648.00
Planning, Engineering, Survey, and Regulatory (15%)	\$ 15,381,360.00
Contingency (20%)	\$ 23,584,752.00
<b>Total</b>	<b>\$ 141,508,512.00</b>

Table 2C

## Governors Park South

### Community Development District

Capital Improvement Plan (CIP)

Improvement	Total Estimated Cost
Master Off-site Infrastructure	\$ 18,180,120.00
Master On-site Infrastructure	\$ 188,701,614.00
Neighborhood Infrastructure	\$ 141,508,512.00
<b>Total</b>	<b>\$ 348,390,246.00</b>

Table 3

## Governors Park South

### Community Development District

**Preliminary Sources and Uses of Funds**

**Sources**

Bond Proceeds:	
Par Amount	\$483,785,000.00
<b>Total Sources</b>	<b>\$483,785,000.00</b>

**Uses**

Project Fund Deposits:	
Project Fund	\$348,390,246.00
Other Fund Deposits:	
Debt Service Reserve Fund	\$42,973,379.86
Capitalized Interest Fund	\$77,405,600.00
Delivery Date Expenses:	
Costs of Issuance	\$15,013,550.00
Rounding	\$2,224.14
<b>Total Uses</b>	<b>\$483,785,000.00</b>

**Financing Assumptions**

- Coupon Rate: 8%
- Capitalized Interest Period: 24 months
- Term: 30 Years
- Underwriter's Discount: 3%
- Cost of Issuance: \$500,000

Table 4

## Governors Park South

### Community Development District

**Benefit Allocation**

Land Use	Total Number of Residential Units	ERU Weight	ERU Basis	Total ERU
Townhomes	114	0.50	per Unit	57.00
Single-family 50'	1,776	1.00	per Unit	1,776.00
Single-family 60'	824	1.20	per Unit	988.80
<b>Total</b>				<b>2,821.80</b>

Table 5A

## Governors Park South

### Community Development District

**Bond Assessments Apportionment - Master Infrastructure**

Land Use	Total Number of Residential Units	Total Cost Allocation*	Maximum Total Bond Assessments Apportionment	Maximum Bond Assessments Apportionment per Unit/ 1,000 sf	Maximum Annual Principal and Interest Payment per Unit/ 1,000 sf on the Bonds**
Townhomes	114	\$4,178,984.63	\$5,803,061.66	\$50,904.05	\$4,810.29
Single-family 50'	1,776	\$130,208,363.31	\$180,811,184.49	\$101,808.10	\$9,620.59
Single-family 60'	824	\$72,494,386.06	\$100,667,848.66	\$122,169.72	\$11,544.70
<b>Total</b>	<b>2,714</b>	<b>\$206,881,734.00</b>	<b>\$287,282,094.81</b>		

\* Please note that cost allocations to units herein are based on the ERU benefit allocation illustrated in Table 4

\*\*Includes county costs of collection estimated at 2% (subject to change) and early payment discount allowance estimated at 4% (subject to change.)

Table 5B

## Governors Park South

### Community Development District

#### Bond Assessments Apportionment - Neighborhood Infrastructure

Land Use	Total Number of Residential Units	Total Cost Allocation*	Maximum Total Bond Assessments Apportionment	Maximum Bond Assessments Apportionment per Unit	Maximum Annual Principal and Interest Payment per Unit on the Bonds**
Townhomes	114	\$2,858,453.89	\$3,969,333.62	\$34,818.72	\$3,290.27
Single-family 50'	1,776	\$89,063,405.38	\$123,676,078.96	\$69,637.43	\$6,580.55
Single-family 60'	824	\$49,586,652.73	\$68,857,492.61	\$83,564.92	\$7,896.66
<b>Total</b>	<b>2,714</b>	<b>\$141,508,512.00</b>	<b>\$196,502,905.19</b>		

\* Please note that cost allocations to units herein are based on the ERU benefit allocation illustrated in Table 4

\*\*Includes county costs of collection estimated at 2% (subject to change) and early payment discount allowance estimated at 4% (subject to change.)

Table 5C

## Governors Park South

### Community Development District

#### Bond Assessments Apportionment

Land Use	Total Number of Residential Units	Total Cost Allocation*	Maximum Total Bond Assessments Apportionment	Maximum Bond Assessments Apportionment per Unit	Maximum Annual Principal and Interest Payment per Unit on the Bonds**
Townhomes	114	\$7,037,438.52	\$9,772,395.28	\$85,722.77	\$8,100.57
Single-family 50'	1,776	\$219,271,768.69	\$304,487,263.45	\$171,445.53	\$16,201.13
Single-family 60'	824	\$122,081,038.79	\$169,525,341.27	\$205,734.64	\$19,441.36
<b>Total</b>	<b>2,714</b>	<b>\$348,390,246.00</b>	<b>\$483,785,000.00</b>		

\* Please note that cost allocations to units herein are based on the ERU benefit allocation illustrated in Table 4

\*\*Includes county costs of collection estimated at 2% (subject to change) and early payment discount allowance estimated at 4% (subject to change.)

## **Exhibit "A"**

Bond Assessments in the amount of \$483,785,000 are proposed to be levied over the area as described below:



Revised July 23, 2024  
April 8, 2024  
Page 1 of 4

Work Order No. 23-271.01  
File No. 129F-21.01A

### **Governors Park South CDD**

All of Fractional Sections 28, 29 and 33, together with a portion of Fractional Section 34, a portion of Sections 19, 30 and 32, and a portion of Section 38 of the George I.F. Clarke Grant (Clarke's Mill Grant), as subdivided in the re-survey by Goold T. Butler, as recorded in Plat Book 1, page 31, of the Public Records of Clay County, Florida, all lying in Township 6 South, Range 26 East, said Clay County, together with a portion of Sections 3 and 4, Township 7 South, Range 26 East, said Clay County, also being a portion of those lands described and recorded in Official Records Book 4675, page 1182, of said Public Records, being more particularly described as follows:

For a Point of Reference, commence at the Southeast corner of said Section 34; thence South  $89^{\circ}38'35''$  West, along the Southerly line of said Section 34, said line also being the dividing line between Township 6 South and Township 7 South, a distance of 2025.79 feet to a point lying on the Westerly right of way line of Telegraph Road (also known as Pacetti Road), said point being the Point of Beginning.

From said Point of Beginning, thence South  $43^{\circ}30'30''$  East, departing said dividing line of Township 6 South and Township 7 South, and along said Westerly right of way line of Telegraph Road (also known as Pacetti Road), a distance of 506.78 feet to a point lying on the Northwesterly right of way line of Bellamy Road, a variable width right of way as determined by maintenance; thence South  $49^{\circ}04'41''$  West, departing said Westerly right of way line and along said Northwesterly right of way line, 469.91 feet; thence South  $54^{\circ}07'48''$  West, continuing along said Northwesterly right of way line, 938.95 feet to a point on said right of way; thence North  $24^{\circ}56'16''$  West, departing said Northwesterly right of way line, 155.45 feet to a point lying on the Northeasterly prolongation of the Westerly line of those lands described and recorded in Official Records Book 1121, page 743, of said Public Records; thence South  $65^{\circ}50'38''$  West, along said Northeasterly prolongation and said Westerly line, 310.24 feet to a point lying on the Northerly line of Government Lot 2 of said Section 3; thence North  $71^{\circ}33'10''$  West, departing said Westerly line, along said Northerly line and along the Northerly line of Government Lot 3, said Section 3, a distance of 2213.14 feet to the Southeast corner of Government Lot 5, said Section 4; thence North  $71^{\circ}38'43''$  West, along the Southerly line of said Government Lot 5, a distance of 714.48 feet; thence North  $71^{\circ}37'06''$  West, continuing along said Southerly line, 804.49 feet to a point lying on the Northerly line of said Section 4; thence South  $89^{\circ}30'31''$  West, departing said Southerly line and along said Northerly line, 3839.68 feet to the Northeast corner of Section 5, said Township 7 South, Range 26 East, said corner lying on the boundary line of Parcel "A", as described and recorded in Official Records Book 4134, page 1421, of said Public Records; thence along said boundary line the following 11 courses: Course 1, thence South  $89^{\circ}44'22''$  West, along the Northerly line of said Section 5, a distance of 2230.82 feet; Course 2, thence North  $18^{\circ}53'37''$  West, departing said Northerly line, 888.32 feet; Course 3, thence North  $29^{\circ}22'13''$  West, 837.86 feet; Course 4, thence North  $23^{\circ}23'34''$  West, 1097.20 feet; Course 5, thence North  $19^{\circ}01'27''$  East, 393.45 feet; Course 6, thence North  $29^{\circ}47'31''$  West, 579.85 feet; Course 7, thence North

**Governors Park South CDD (continued)**

24°31'20" West, 1280.38 feet; Course 8, thence North 66°44'54" East, 12.08 feet; Course 9, thence North 34°18'20" East, 326.40 feet; Course 10, thence North 33°50'17" West, 459.98 feet to the Southeasterly corner of Parcel "E", as described and recorded in said Official Records Book 4675, page 1182, said corner lying on the Southerly line of said Section 29; Course 11, thence North 89°33'47" West, along said Southerly line, 1189.84 feet to the Southwesterly corner of said Section 29; thence North 00°36'58" East, departing said boundary line and along the Westerly line of said Section 29, a distance of 783.83 feet to a point hereinafter referred to as Reference Point "A"; thence continue North 00°36'58" East, 38 feet, more or less, to the centerline of Governor's Creek; thence Northwesterly along said centerline, 5269 feet, more or less, to its intersection with the Southerly line of said Section 19; thence North 89°55'39" West, departing said centerline and along said Southerly line, 45 feet, more or less, to a point that bears North 22°13'12" West, 4931.22 feet from said Reference Point "A"; thence continue North 89°55'39" West, along said Southerly line, 170.00 feet to the Southeasterly corner of those lands described and recorded in Deed Book P, page 93, of said Public Records; thence Northerly, Westerly and Southerly along the Easterly, Northerly and Westerly lines of said Deed Book P, page 93, the following 3 courses: Course 1, thence North 00°04'21" East, departing said Southerly line, 600.60 feet; Course 2, thence North 89°55'39" West, 363.00 feet; Course 3, thence South 00°04'21" West, 600.60 feet to the Southwesterly corner thereof, said corner lying on said Southerly line of Section 19; thence North 89°55'39" West, along said Southerly line, 318.85 feet to its intersection with the Easterly right of way line of County Road No. 315 (Springbank Road), a variable width right of way as depicted on Florida Department of Transportation Right of Way Map Section No. 71493; thence Northerly along said Easterly right of way line the following 5 courses: Course 1, thence North 00°09'41" West, departing said Southerly line, 928.10 feet to the Southwesterly corner of Parcel No. 178, Part "C", as described and recorded in Official Records Book 4081, page 1173, of said Public Records; Course 2, thence North 89°50'19" East, along the Southerly line of said Parcel No. 178, Part "C", 20.39 feet to the Southeasterly corner thereof; Course 3, thence North 00°09'40" West, along the Easterly line of said Parcel No. 178, Part "C", 210.00 feet to the point of curvature of a curve concave Westerly having a radius of 1970.00 feet; Course 4, thence Northerly, continuing along said Easterly line and along the arc of said curve, through a central angle of 08°20'03", an arc length of 286.55 feet to the Northerly most corner of said Parcel 178, Part "C", said arc being subtended by a chord bearing and distance of North 04°19'42" West, 286.30 feet; Course 5, thence North 00°09'41" West, along a non-tangent line, 1030.11 feet to its intersection with the Southwesterly limited access right of way line of State Road No. 23 (First Coast Outer Beltway), a 324 foot limited access right of way, as depicted on said Florida Department of Transportation Right of Way Map Section No. 71493; thence Easterly along said Southwesterly limited access right of way line the following 3 courses: Course 1, thence South 29°14'50" East, departing said Easterly right of way line, 4414.71 feet to the point of curvature of a curve concave Northerly having a radius of 4746.00 feet; Course 2, thence Easterly along the arc of said curve, through a central angle of 82°17'25", an arc length of 6816.38 feet to the point of tangency of said curve, said arc being subtended by a chord bearing and distance of South 70°23'32" East, 6245.44 feet; Course 3, thence North 68°27'45" East, 2341.00 feet; thence South 44°34'14" East, departing said Southwesterly limited access right of way line, 685.65 feet; thence South 15°59'15" East, 38.28 feet; thence South 52°24'18" East, 57.69 feet; thence South 83°24'26" East, 60.22 feet; thence

**Governors Park South CDD (continued)**

South 25°46'05" East, 36.70 feet; thence South 07°14'49" East, 80.00 feet; thence South 32°36'59" West, 107.45 feet; thence South 47°50'08" West, 53.48 feet; thence South 35°52'07" West, 166.61 feet; thence South 47°52'37" West, 113.70 feet; thence South 28°39'20" West, 77.60 feet; thence South 48°28'50" West, 170.70 feet; thence South 40°54'13" West, 54.57 feet; thence South 29°25'19" West, 78.23 feet; thence South 40°31'43" West, 78.06 feet; thence South 54°47'25" West, 41.27 feet; thence South 33°00'24" West, 45.79 feet; thence South 45°08'48" West, 76.87 feet; thence South 33°16'19" West, 48.96 feet; thence South 45°08'48" West, 76.87 feet; thence South 33°16'19" West, 48.96 feet; thence South 29°38'12" East, 26.43 feet; thence South 19°21'04" East, 110.07 feet to the point of curvature of a curve concave Northeasterly having a radius of 1864.00 feet; thence Southeasterly along the arc of said curve, through a central angle of 32°31'42", an arc length of 1058.25 feet to point of tangency of said curve, said arc being subtended by a chord bearing and distance of South 35°36'55" East, 1044.09 feet; thence South 51°52'46" East, 40.50 feet to a point on a non-tangent curve concave Northerly having a radius of 1863.00 feet; thence Easterly along the arc of said curve, through a central angle of 38°48'40", an arc length of 1261.96 feet to a point on said curve, said arc being subtended by a chord bearing and distance of South 72°30'55" East, 1237.97 feet; thence North 01°55'15" West, along a non-tangent line, 492.78 feet; thence North 42°42'17" East, 149.97 feet; thence South 89°37'41" East, 408.77 feet; thence North 17°28'35" West, 474.87 feet; thence North 16°11'36" East, 451.51 feet to a point lying on the Southerly line of Plant Site Parcel, as described and recorded in Official Records Book 3840, page 83, of said Public Records; thence Northeasterly along said Southerly line the following 9 courses: Course 1, thence North 59°17'36" East, 210.00 feet; Course 2, thence North 75°51'53" East, 208.56 feet; Course 3, thence North 09°34'59" East, 188.72 feet; Course 4, thence North 50°13'09" West, 218.03 feet; Course 5, thence North 45°47'16" East, 142.42 feet; Course 6, thence North 79°15'12" East, 486.39 feet; Course 7, thence North 13°12'57" West, 103.23 feet; Course 8, thence South 87°53'01" East, 546.24 feet; Course 9, thence North 41°15'45" East, 133.86 feet to the Easterly most corner thereof; thence North 85°36'52" East, 276.80 feet to a point lying on the Westerly right of way line of County Road No. 15A, a 66 foot right of way per occupation and maintenance; thence Southerly along said Westerly right of way line and along the arc of a non-tangent curve concave Easterly having a radius of 1942.86 feet, through a central angle of 16°55'33", an arc length of 573.94 feet to the point of tangency of said curve, said arc being subtended by a chord bearing and distance of South 12°50'54" East, 571.86 feet; thence South 21°18'41" East, 2254.63 feet to a point lying on the Westerly right of way line of Telegraph Road (also known as Pacetti Road), a variable width right of way per occupation and maintenance; thence Southerly along said Westerly right of way line the following 5 courses: Course 1, thence South 04°27'17" East, departing said Westerly right of way line of County Road 15A, 1690.81 feet; Course 2, thence South 00°12'30" East, 114.76 feet; Course 3, thence South 07°08'02" West, 43.89 feet; Course 4, thence South 09°50'30" East, 32.68 feet, said point being Reference Point C; Course 5, thence continue South 09°50'30" East, 10 feet, more or less, to a point lying on the Southerly top of bank of Prescott Branch; thence Southwesterly, departing said Westerly right of way line and along the meanderings of said Southerly top of bank, 1339 feet, more or less; thence Northwesterly, continuing along said meanderings, 744 feet, more or less; thence South 10°26'09" East, 14 feet, more or less, to a point bearing South 81°07'14" West, 1812.34 feet from said Reference Point C; thence continue South 10°26'09" East, 17.12 feet to the

**Governors Park South CDD (continued)**

Northeast corner of Lot 13 of Twin Oaks, an unrecorded subdivision; thence North  $74^{\circ}44'25''$  West, along the Northerly line of said Lot 13, a distance of 222.38 feet to the Northwest corner of said Twin Oaks; thence South  $00^{\circ}20'15''$  East, along the Westerly line of said Twin Oaks, 905.60 feet to the Southwest corner thereof; thence North  $78^{\circ}57'35''$  East, along the Southerly line of said Twin Oaks, 1082.30 feet; thence South  $10^{\circ}37'52''$  East, departing said Southerly line, 425.94 feet; thence North  $78^{\circ}53'41''$  East, 1080.72 feet to a point lying on said Westerly right of way line of Telegraph Road (also known as Pacetti Road); thence South  $10^{\circ}35'29''$  East, along said Westerly right of way line, 458.78 feet to its intersection with the South line of Government Lot 2 of said Section 34, as monumented; thence North  $85^{\circ}25'32''$  East, departing said Westerly right of way line and along said South line, 353.65 feet to the Northwest corner of Government Lot 4 of said Section 34; thence South  $00^{\circ}05'26''$  East, along the Westerly line of said Government Lot 4, a distance of 1288.03 feet to the Southwest corner of said Government Lot 4; thence North  $89^{\circ}38'35''$  East, along the Southerly line of said Government Lot 4, said line also being the Southerly line of said Section 34, a distance of 604.74 feet to the Point of Beginning.

Containing 1860 acres, more or less.

## Exhibit "B"

The debt assessment lien is being placed on property described in the attached legal description. For notice purposes, listed below are the potentially applicable County Property Appraiser parcels, and property owners, developers/potential property owners, and developers that will be included on a mailing list related to debt assessments:

<b>Parcel ID</b>	<b>Owner</b>	<b>Address</b>	<b>City   State   Zip</b>
38-06-26-016516-000-00	Governors Park Property Holdings, LLC	300 Atlantic St	Stamford, CT 06901
32-06-26-015650-001-00	Governors Park Property Holdings, LLC	300 Atlantic St	Stamford, CT 06901
33-06-26-015652-000-00	Governors Park Property Holdings, LLC	300 Atlantic St	Stamford, CT 06901
34-06-26-015714-000-00	Governors Park Property Holdings, LLC	300 Atlantic St	Stamford, CT 06901
03-07-26-015792-000-00	Governors Park Property Holdings, LLC	300 Atlantic St	Stamford, CT 06901
29-06-26-015611-001-00	Governors Park Property Holdings, LLC	300 Atlantic St	Stamford, CT 06901

[THIS PAGE INTENTIONALLY LEFT BLANK]

# GOVERNORS PARK SOUTH COMMUNITY DEVELOPMENT DISTRICT

Preliminary First Supplemental Special Assessment  
Methodology Report  
(Assessment Area One)

November 14, 2024



Provided by:

**Wrathell, Hunt and Associates, LLC**  
2300 Glades Road, Suite 410W  
Boca Raton, FL 33431  
Phone: 561-401-0010  
Fax: 561-401-0013  
Website: [www.whhassociates.com](http://www.whhassociates.com)

## Table of Contents

<b>1.0</b>	<b>Introduction</b>	
1.1	Purpose .....	1
1.2	Scope of the First Supplemental Report .....	1
1.3	Special Benefits and General Benefits .....	1
1.4	Organization of the First Supplemental Report .....	2
<b>2.0</b>	<b>Development Program</b>	
2.1	Overview .....	2
2.2	The Development Program .....	3
<b>3.0</b>	<b>The Phase 1A Project</b>	
3.1	Overview .....	3
3.2	The Phase 1A Project .....	3
<b>4.0</b>	<b>Financing Program</b>	
4.1	Overview .....	4
4.2	Types of Bonds Proposed .....	4
<b>5.0</b>	<b>Assessment Methodology</b>	
5.1	Overview .....	5
5.2	Benefit Allocation .....	5
5.3	Assigning Debt .....	8
5.4	Lienability Test: Special and Peculiar Benefit to the Property .....	8
5.5	Lienability Test: Reasonable and Fair Apportionment of the Duty to Pay .....	9
5.6	True-Up Mechanism .....	9
5.7	Assessment Roll .....	11
<b>6.0</b>	<b>Additional Stipulations</b>	
6.1	Overview .....	12
<b>7.0</b>	<b>Appendix</b>	
	Table 1 .....	13
	Table 2 .....	13
	Table 3 .....	13
	Table 4 .....	14
	Table 5 .....	14
	Table 6 .....	14



## **1.0 Introduction**

### **1.1 Purpose**

This Preliminary First Supplemental Special Assessment Methodology Report (the “First Supplemental Report”) was developed to supplement the Master Special Assessment Methodology Report (the “Master Report”) dated July 2, 2024 and to provide a supplemental financing plan and a supplemental special assessment methodology for the Governors Park South Community Development District (the “District”), located in Clay County, Florida, as related to funding a portion of the costs of the acquisition and construction of public infrastructure improvements contemplated to be provided by the District to support the development of the 401 residential dwelling units projected to be developed within the Assessment Area One (defined herein.)

### **1.2 Scope of the First Supplemental Report**

This First Supplemental Report presents the projections for financing a portion of what is known as the “Phase 1A Project,” which refers to the portion of the District’s overall “Capital Improvement Plan” related to the development of the 401 residential units within Phase 1A of development within the District (“Assessment Area One”). The Phase 1A Project is described in the Engineer’s Report dated June 17, 2024 as supplemented by the First Supplemental Engineer’s Report developed by England-Thims & Miller, Inc. (the “District Engineer”) and dated November 12, 2024 (collectively the “Engineer’s Report”). This First Supplemental Report also describes the method for the allocation of special benefits and the apportionment of special assessment debt resulting from the provision and funding of a portion of the Phase 1A Project with proceeds of indebtedness projected to be issued by the District.

### **1.3 Special Benefits and General Benefits**

The public infrastructure improvements undertaken and funded by the District as part of the Phase 1A Project create special and peculiar benefits, different in kind and degree than general benefits, for properties within the District as well as general benefits to properties outside the District and to the public at large. However, as discussed within this First Supplemental Report, these general benefits are incidental in nature and are readily distinguishable from the special and peculiar benefits which accrue to property within the District. The District’s Phase 1A Project enables properties within Assessment Area One to be developed.

There is no doubt that the general public and property owners of property outside the District will benefit from the provision of the Phase 1A Project. However, these benefits are only incidental since the Phase 1A Project is designed solely to provide special benefits peculiar to property within the District. Properties outside the District are not directly served by the Phase 1A Project and do not depend upon the Phase 1A Project to obtain or to maintain their development entitlements. This fact alone clearly distinguishes the special benefits which Assessment Area One properties receive compared to those lying outside of the boundaries of the District.

The Phase 1A Project will provide public infrastructure improvements which are all necessary in order to make the lands within the District and Assessment Area One developable and saleable. Even though the exact value of the benefits provided by the Phase 1A Project is hard to estimate at this point, it is nevertheless greater than the costs associated with providing the same.

#### **1.4 Organization of the First Supplemental Report**

*Section Two* describes the development program as proposed by the Developer, as defined below.

*Section Three* provides a summary of the Phase 1A Project as determined by the District Engineer.

*Section Four* discusses the financing program for Assessment Area One.

*Section Five* introduces the special assessment methodology for Assessment Area One.

## **2.0 Development Program**

### **2.1 Overview**

The District will serve the Governors Park South development, a master planned residential development located in Clay County, Florida. The land within the District consists of approximately 1,860 +/- acres and is generally located northwest of US-17S, west of CR-15A and south of CR-16A. Of the aforementioned acreage, Assessment Area One accounts for approximately 234 +/- acres.

## **2.2 The Development Program**

The development of Governors Park South is anticipated to be conducted by Governors Park Property Holdings, LLC or an affiliated entity (the "Developer"). Based upon the information provided by the Developer and the District Engineer, the current development plan envisions 114 Townhomes, 1,776 single family 50' units, 824 single family 60' units, as well for a total of 2,714 residential units developed over a multi-year period in multiple development phases, although unit numbers, land use types and phasing may change throughout the development period. Of the aforementioned 2,714 residential units, the first phase of development will consist of 401 residential dwelling units, developed within Assessment Area One, while the remaining 2,313 residential dwelling units will be developed in future phases. Table 1 in the *Appendix* illustrates the development plan for the District.

## **3.0 The Phase 1A Project**

### **3.1 Overview**

The public infrastructure costs to be funded by the District are described by the District Engineer in the Engineer's Report. Only public infrastructure that may qualify for bond financing by the District under Chapter 190, Florida Statutes and under the Internal Revenue Code of 1986, as amended, was included in these estimates.

### **3.2 The Phase 1A Project**

The Phase 1A Project comprises a portion of the Capital Improvement Plan for the District and is designed to serve and will benefit, upon platting, the 401 residential dwelling units that are projected to be developed within Assessment Area One. According to the Engineer's Report, the Phase 1A Project is composed of C.R. 15A Roadway Improvements, GCSB from CR-15A to US-17, GCSB (4-Lane Roadway), Master Off-Site Utility Improvements (potable water, sewer and reclaimed water transmission), Underground Electric (conduit only for roadway) and Hardscape, Landscape, Irrigation, Fencing, and Signage, the costs of which, along with contingencies and professional services, were estimated by the District Engineer at \$27,085,431.60. The public infrastructure improvements that compose or constitute the Capital Improvement Plan will serve and provide benefit to all land uses in the District and will compose or constitute an integrated system of improvements, which means all of improvements will serve the entire District and

improvements will be interrelated such that they will reinforce one another.

Table 2 in the *Appendix* illustrates the specific components of the Capital Improvement Plan.

## **4.0 Financing Program**

### **4.1 Overview**

As noted above, the District is embarking on a program of capital improvements which will facilitate the development of lands within Assessment Area One. Generally, construction of public improvements is either funded by the Developer and then acquired by the District or funded directly by the District. The choice of the exact mechanism for providing public infrastructure improvements has not yet been made at the time of this writing, and the District may either acquire the public infrastructure from the Developer or construct it, or even partly acquire it and partly construct it.

### **4.2 Types of Bonds Proposed**

The financing plan for the District provides for the issuance of the Special Assessment Revenue Bonds, Series 2024 (Assessment Area One) in the estimated principal amount of \$9,725,000\* to finance a portion of the Phase 1A Project costs in the estimated total amount of \$8,634,000\*. It is anticipated that any costs of the Phase 1A Project which are not funded by the Series 2024 Bonds will be completed or funded by the Developer or by future bonds. The Series 2024 Bonds are structured to be amortized in 30 annual installments. Interest payments on the Series 2024 Bonds would be made every May 1 and November 1, and principal payments on the Series 2024 Bonds would be made either every May 1 or November 1.

In order to finance a portion of the costs of the Phase 1A Project in the estimated total amount of \$8,634,000\*, the District will need to borrow more funds and incur indebtedness in the estimated principal amount of \$9,725,000\*. The difference is composed of funding a debt service reserve, funding capitalized interest and paying costs of issuance, which include the underwriter's discount. Preliminary sources and uses of funding for the Series 2024 Bonds are presented in Table 3 in the *Appendix*.

---

\* Preliminary, subject to change.

## **5.0 Assessment Methodology**

### **5.1 Overview**

The issuance of the Series 2024 Bonds provides the District with funds necessary to construct/acquire the infrastructure improvements which are part of the Phase 1A Project outlined in *Section 3.2* and described in more detail by the District Engineer in the Engineer's Report. These improvements lead to special and general benefits, with special benefits accruing to the assessable properties within the boundaries of the District and Assessment Area One and general benefits accruing to areas outside the District but being only incidental in nature. The debt incurred in financing the public infrastructure will be secured by assessing properties that derive special and peculiar benefits from the Phase 1A Project. All properties that receive special benefits from the Phase 1A Project will ultimately be assessed for their fair share of the debt issued in order to finance a portion of the Phase 1A Project.

### **5.2 Benefit Allocation**

The current development plan for the District envisions the development of 114 Townhomes, 245 single family 40' units, 1,776 single family 50' units, 824 single family 60' units, for a total of 2,714 residential units, with the Assessment Area One consisting of a total of 401 residential dwelling units within Phases 1 and the remaining 2,313 residential dwelling units will be developed in future phases, although unit numbers, land uses and product types may change throughout the development period.

The public infrastructure included in the Capital Improvement Plan will constitute an interrelated system of master improvements, which means that all of the public infrastructure improvements will serve the entire District and such public improvements will be interrelated in such way that, once constructed, they will reinforce each other and their combined benefit will be greater than the sum of their individual benefits. All of the product types within the District will benefit from each infrastructure improvement category, as the improvements provide basic infrastructure to all product types and all phases of development within the District and benefit all product types in all phases within the District as an integrated system of improvements.

Even though all of the infrastructure included in the Capital Improvement Plan will constitute an interrelated system of public improvements, the public infrastructure improvements are projected to be constructed in two (2) infrastructure construction phases or projects coinciding with the phases of land development. The Phase

1A Project, consists of that portion of the overall Capital Improvement Plan that is necessary for the development of land within Assessment Area One and the District.

As stated previously, the public infrastructure improvements included in the Capital Improvement Plan have a logical connection to the special and peculiar benefits received by the assessable land within the District, as without such improvements, the development of the properties within the District would not be possible. Based upon the connection between the improvements and the special and peculiar benefits to the assessable land within Assessment Area One and within the District, the District will assign or allocate a portion of the District's debt through the imposition of non-ad valorem assessments, to the land receiving such special and peculiar benefits. Even though these special and peculiar benefits are real and ascertainable, the precise amount of the benefit cannot yet be calculated with mathematical certainty. However, such benefit is more valuable than the assessment related to the financed cost of constructing the improvements.

In following the Master Report, this First Supplemental Report proposes to allocate the benefit associated with the Capital Improvement Plan to the product types proposed to be developed within Assessment Area One in proportion to their density of development and intensity of use of infrastructure as measured by a standard unit called an Equivalent Residential Unit ("ERU"). Table 4 in the *Appendix* illustrates the ERU weights that are proposed to be assigned to the unit types contemplated to be developed within Assessment Area One based on the densities of development and the intensities of use of infrastructure, total ERU counts for each unit type, and the share of the benefit received by each unit type.

The rationale behind the different ERU values is supported by the fact that generally and on average units with smaller lot sizes will use and benefit from the improvements which are part of the Capital Improvement Plan less than units with larger lot sizes, as, for instance, generally and on average units with smaller lot sizes will produce less storm water runoff, may produce fewer vehicular trips, and may need less water/sewer capacity than units with larger lot sizes. As the exact amount of the benefit and appreciation is not possible to be calculated at this time, the use of ERU measures serves as a reasonable approximation of the relative amount of benefit received by representatives of different unit types from the Capital Improvement Plan.

Table 5 in the *Appendix* presents the allocation of the amount of Capital Improvement Plan costs allocated to Assessment Area One to the various unit types proposed to be developed in Assessment Area One based on the ERU benefit allocation factors present in Table 4. Further, Table 5 illustrates the approximate costs that are projected to be financed with the Series 2024 Bonds, and the approximate costs of the portion of the Phase 1A Project costs allocable to Assessment Area One to be contributed by the Developer or funded with future bonds. With the Series 2024 Bonds funding an estimated \$8,634,000\* in costs of the Phase 1A Project, the Developer or future bonds is anticipated to fund improvements valued at an estimated \$18,451,431.60\* which will not be funded with proceeds of the Series 2024 Bonds. Finally, Table 6 in the *Appendix* presents the apportionment of the non-ad valorem special assessments securing the Series 2024 Bonds (herein, the “Series 2024 Bond Assessments”) and also present the annual levels of the projected annual debt service assessments per unit.

***Amenities*** - It is our understanding that all amenities planned for the community will either be “common elements” or owned by the District. No Series 2024 Bond Assessments will be allocated herein to any platted amenities or other platted common areas planned for the development that meet the definition of “common element” in Section 193.0235, Florida Statutes. If the amenities are owned by the District, then they would be governmental property not subject to the Series 2024 Bond Assessments and would be open to the general public, subject to District rules, rates and policies. Should the District discover that a privately-owned amenity has been developed within Assessment Area One which does not meet the definition of a “common element” in Section 193.0235, Florida Statutes, further assessment proceedings will be necessary to reallocate assessments to such parcel.

***Governmental Property*** - If at any time, any portion of the property contained in the District is proposed to be sold or otherwise transferred to a unit of local, state, or federal government or similar exempt entity (without consent of such governmental unit or similarly exempt entity to the imposition of Series 2024 Bond Assessments thereon), all future unpaid Series 2024 Bond Assessments for such tax parcel shall become due and payable immediately prior to such transfer.

---

\* Preliminary, subject to change.

### 5.3 Assigning Debt

As the land in the District is not yet platted for its intended final use and the precise location of the residential units by lot or parcel is unknown, the Series 2024 Bond Assessments will initially be levied on all developable lands in Assessment Area One on an equal pro-rata gross acre basis, thus the Series 2024 Bond Assessments in the estimated amount of \$9,725,000\* will be preliminarily levied on approximately 234 +/- gross acres contained within Assessment Area One (the “Series 2024 Bonds Assessment Area”) at a rate of \$41,559.83\* per acre.

When the land in Assessment Area One is platted, the Series 2024 Bond Assessments will be allocated to each platted parcel within Assessment Area One on a first platted-first assigned basis based on the planned use for that platted parcel as reflected in Table 6 in the *Appendix*. Such allocation of the Series 2024 Bond Assessments from unplatted gross acres to platted parcels will reduce the amount of the Series 2024 Bond Assessments levied on unplatted gross acres within Assessment Area One.

***Transferred Property.*** In the event unplatted land within Assessment Area One is sold to a third party (the “Transferred Property”), the Series 2024 Bond Assessments will be assigned to such Transferred Property at the time of the sale based on the maximum total number of ERUs (as herein defined) assigned by the Developer to that Transferred Property, subject to review by the District’s methodology consultant, to ensure that any such assignment is reasonable, supported by current development rights and plans, and otherwise consistent with this First Supplemental Report. The owner of the Transferred Property will be responsible for the total Series 2024 Bond Assessments applicable to the Transferred Property, regardless of the total number of ERUs ultimately actually platted. This total Series 2024 Bond Assessment is allocated to the Transferred Property at the time of the sale.

### 5.4 Lienability Test: Special and Peculiar Benefit to the Property

As first discussed in *Section 1.3*, Special Benefits and General Benefits, public infrastructure improvements undertaken by the District create special and peculiar benefits to certain properties within the District. The District's improvements benefit assessable properties within the District and accrue to all such assessable properties on an ERU basis.

---

\* Preliminary, subject to change.



Public infrastructure improvements undertaken by the District can be shown to be creating special and peculiar benefits to the property within the District. The special and peculiar benefits resulting from each improvement include, but are not limited to:

- a. added use of the property;
- b. added enjoyment of the property;
- c. decreased insurance premiums;
- d. increased marketability and value of the property;
- e. improved access to the property.

The public infrastructure improvements which are part of the Capital Improvement Plan make the land in the District developable and saleable and when implemented jointly as parts of the Capital Improvement Plan, provide special and peculiar benefits which are greater than the benefits of any single category of improvements. These special and peculiar benefits are real and ascertainable, but not yet capable of being calculated and assessed in terms of numerical value; however, such benefits are more valuable than either the cost of, or the actual assessment levied for, the improvement or debt allocated to the parcel of land.

#### **5.5 Lienability Test: Reasonable and Fair Apportionment of the Duty to Pay**

A reasonable estimate of the proportion of special and peculiar benefits received from the improvements is delineated in Table 4 (expressed as ERU factors) in the *Appendix*.

The apportionment of the Series 2024 Bond Assessments is fair and reasonable because it was conducted on the basis of consistent application of the methodology described in *Section 5.2* across all assessable property within Assessment Area One within the District according to reasonable estimates of the special and peculiar benefits derived from the Phase 1A Project by different unit types.

#### **5.6 True-Up Mechanism**

The District's assessment program is predicated on the development of lots in a manner sufficient to include all of the planned Equivalent Residential Units ("ERUs") as set forth in Table 4 in the Appendix ("Development Plan"). At such time as lands within Assessment Area One are to be platted (or re-platted) or site plans are to be approved (or re-approved), the plat or site plan (either, herein, "Proposed Plat") shall be presented to the District for a "true-up" review as follows:

a. If a Proposed Plat results in the same amount of ERUs (and thus Series 2024 Bond Assessments) able to be imposed on the “Remaining Unplatted Lands” (i.e., those remaining unplatted lands after the Proposed Plat is recorded) as compared to what was originally contemplated under the Development Plan, then the District shall allocate the Series 2024 Bond Assessments to the product types being platted and the remaining property in accordance with this First Supplemental Report, and cause the Series 2024 Bond Assessments to be recorded in the District’s improvement lien book.

b. If a Proposed Plat results in a greater amount of ERUs (and thus Series 2024 Bond Assessments) able to be imposed on the Remaining Unplatted Lands as compared to what was originally contemplated under the Development Plan, then the District may undertake a pro rata reduction of Series 2024 Bond Assessments for all assessed properties within the Property, may allocate additional ERUs/ densities for a future bond issuance, or may otherwise address such net decrease as permitted by law.

c. If a Proposed Plat results in a lower amount of ERUs (and thus Series 2024 Bond Assessments) able to be imposed on the Remaining Unplatted Lands as compared to what was originally contemplated under the Development Plan, then the District shall require the landowner(s) of the lands encompassed by the Proposed Plat to pay a “True-Up Payment” equal to the difference between: (i) the Series 2024 Bond Assessments originally contemplated to be imposed on the lands subject to the Proposed Plat, and (ii) the Series 2024 Bond Assessments able to be imposed on the lands subject to the Proposed Plat, after the Proposed Plat (plus applicable interest, collection costs, penalties, etc.).

With respect to the foregoing true-up analysis, the District’s Assessment Consultant, in consultation with the District Engineer and District Counsel, shall determine in their sole discretion what amount of ERUs (and thus Series 2024 Bond Assessments) are able to be imposed on the Remaining Unplatted Lands, taking into account a Proposed Plat, by reviewing: a) the original, overall Development Plan showing the number and type of units reasonably planned for the development, b) the revised, overall development plan showing the number and type of units reasonably planned for the development, c) proof of the amount of entitlements for the Remaining Unplatted Lands, d) evidence of allowable zoning conditions that would enable those entitlements to be placed in accordance with the revised Development Plan, and e) documentation that shows the feasibility of implementing the

proposed Development Plan. Prior to any decision by the District not to impose a true-up payment, a supplemental methodology shall be produced demonstrating that there will be sufficient Series 2024 Bond Assessments to pay debt service on the Series 2024 Bond Assessments and the District will conduct new proceedings under Chapters 170, 190 and 197, Florida Statutes upon the advice of District Counsel.

Any True-Up Payment shall become due and payable that tax year by the landowner of the lands subject to the Proposed Plat, shall be in addition to the regular assessment installment payable for such lands, and shall constitute part of the debt assessment liens imposed against the Proposed Plat property until paid. A True-Up Payment shall include accrued interest on the Series 2024 Bond Assessments to the quarterly interest payment date that occurs at least 45 days after the True-Up Payment (or the second succeeding quarterly interest payment date if such True-Up Payment is made within forty-five (45) calendar days before a quarterly interest payment date (or such other time as set forth in the supplemental indentures for the applicable bond series)).

All Series 2024 Bond Assessments levied run with the land, and such assessment liens include any True-Up Payments. The District will not release any liens on property for which True-Up Payments are due, until provision for such payment has been satisfactorily made. Further, upon the District's review of the final plat for the developable acres within Assessment Area One, any unallocated Series 2024 Bond Assessments shall become due and payable and must be paid prior to the District's approval of that plat. This true-up process applies for both plats and/or re-plats.

Such review shall be limited solely to the function and the enforcement of the District's assessment liens and/or true-up agreements. Nothing herein shall in any way operate to or be construed as providing any other plat approval or disapproval powers to the District. For further detail on the true-up process, please refer to the applicable assessment resolution(s).

## **5.7 Assessment Roll**

The Series 2024 Bond Assessments in the estimated amount of \$9,725,000\* are proposed to be levied over the area described in Exhibit "A". Excluding any capitalized interest period, debt service assessments shall be paid in no more than thirty (30) annual principal installments.

---

\* Preliminary, subject to change.

## 6.0 Additional Stipulations

### 6.1 Overview

Wrathell, Hunt and Associates, LLC was retained by the District to prepare a methodology to fairly allocate the special assessments related to the District's Capital Improvement Plan. Certain financing, development and engineering data was provided by members of District Staff, the District Engineer and/or the Developer. The allocation methodology described herein was based on information provided by those professionals. Wrathell, Hunt and Associates, LLC makes no representations regarding said information transactions beyond restatement of the factual information necessary for compilation of this First Supplemental Report. For additional information on the bond structure and related items, please refer to the Offering Statement associated with this transaction.

**Wrathell, Hunt and Associates, LLC does not represent the District as a Municipal Advisor or Securities Broker nor is Wrathell, Hunt and Associates, LLC registered to provide such services as described in Section 15B of the Securities Exchange Act of 1934, as amended. Similarly, Wrathell, Hunt and Associates, LLC does not provide the District with financial advisory services or offer investment advice in any form.**

## 7.0 Appendix

Table 1

### Governors Park South

#### Community Development District

##### Development Plan - Phase 1 Project

Land Use	Total Number of Residential Units
Single-family 50'	151
Single-family 60'	250
<b>Total</b>	<b>401</b>

Table 2

### Governors Park South

#### Community Development District

##### Capital Improvement Plan (CIP) - Phase 1 Project

Improvement	Master Off-site Infrastructure	Master On-site Infrastructure	Total Estimated Cost
C.R. 15A Roadway Improvements	\$2,000,000.00	-	\$2,000,000.00
GCSB from CR-15A to US-17	\$5,500,000.00	-	\$5,500,000.00
GCSB (4-Lane Roadway)	-	\$3,873,125.00	\$3,873,125.00
Master Off-Site Utility Improvements (potable water, sewer and reclaimed water transmission)	\$3,354,000.00	-	\$3,354,000.00
Underground Electric (conduit only for roadway)	\$220,000.00	-	\$220,000.00
Hardscape, Landscape, Irrigation, Fencing, and Signage	\$2,100,000.00	\$2,580,000.00	\$4,680,000.00
Planning, Engineering, Survey, and Regulatory (15%)	\$1,976,100.00	\$967,968.00	\$2,944,068.00
Contingency (20%)	\$3,030,020.00	\$1,484,218.60	\$4,514,238.60
<b>Total</b>	<b>\$18,180,120.00</b>	<b>\$8,905,311.60</b>	<b>\$27,085,431.60</b>

Table 3

### Governors Park South

#### Community Development District

##### Preliminary Sources and Uses of Funds

###### Sources

###### Bond Proceeds:

Par Amount	\$9,725,000.00
<b>Total Sources</b>	<b>\$9,725,000.00</b>

###### Uses

###### Project Fund Deposits:

Project Fund	\$8,634,000.00
--------------	----------------

###### Other Fund Deposits:

Debt Service Reserve Fund	\$676,500.00
Capitalized Interest Fund	\$0.00

###### Delivery Date Expenses:

Costs of Issuance	\$414,500.00
<b>Total Uses</b>	<b>\$9,725,000.00</b>

Table 4

## Governors Park South

### Community Development District

#### Benefit Allocation - Phase 1 Project

Land Use	Total Number of Residential Units	ERU Weight	ERU Basis	Total ERU
Single-family 50'	151	1.00	per Unit	151.00
Single-family 60'	250	1.20	per Unit	300.00
<b>Total</b>	<b>401</b>			<b>451.00</b>

Table 5

## Governors Park South

### Community Development District

Land Use	Infrastructure Allocation Based on ERU Method	Infrastructure Financed with Series 2024 Bonds	Infrastructure Funded with Proceeds of Future Bonds and/or Contributed by the Developer*
Single-family 50'	\$9,068,514.79	\$2,890,762.75	\$6,177,752.04
Single-family 60'	\$18,016,916.81	\$5,743,237.25	\$12,273,679.56
<b>Total</b>	<b>\$27,085,431.60</b>	<b>\$8,634,000.00</b>	<b>\$18,451,431.60</b>

\* Can be funded with proceeds of future bonds

Table 6

## Governors Park South

### Community Development District

#### Bond Assessments Apportionment - Phase 1 Project

Land Use	Total Number of Residential Units	Total Cost Allocation*	Maximum Total Bond Assessments Apportionment	Maximum Bond Assessments Apportionment per Unit	Maximum Annual Principal and Interest Payment per Unit**
Single-family 50'	151	\$9,068,514.79	\$3,256,042.13	\$21,563.19	\$1,595.74
Single-family 60'	250	\$18,016,916.81	\$6,468,957.87	\$25,875.83	\$1,914.89
<b>Total</b>	<b>401</b>	<b>\$27,085,431.60</b>	<b>\$9,725,000.00</b>		

\* Please note that cost allocations to units herein are based on the ERU benefit allocation illustrated in Table 4

\*\*Includes county costs of collection estimated at 2% (subject to change) and early payment discount allowance estimated at 4% (subject to change.)

## EXHIBIT "A"

Series 2024 Bond Assessments in the estimated amount of 9,725,000\* are proposed to be levied uniformly over the area described below:

---

\* Preliminary, subject to change.

March 28, 2024  
Page 1 of 2

## EXHIBIT 2B

Work Order No. 24-087.00  
File No. 130B-21.00A

### Phase 1A

A portion of fractional Sections 33 and 34, and a portion of Section 38 of the George I.F. Clarke Grant (Clarke's Mill Grant), as subdivided in the re-survey by Goold T. Butler, recorded in Plat Book 1, page 31, of the Public Records of Clay County, Florida, all lying in Township 6 South, Range 26 East, said county, being more particularly described as follows:

For a Point of Reference, commence at the intersection of the Southerly right of way line of State Road No. 23 (First Coast Outer Beltway), a 324 foot limited access right of way line as presently established, with the Westerly right of way line of County Road No. 15A, a 66 foot right of way per occupation and maintenance; thence South  $02^{\circ}13'41''$  West, along said Westerly right of way line, 1989.38 feet to the point of curvature of a curve concave Easterly having a radius of 1942.86 feet; thence Southerly, continuing along said Westerly right of way line and along the arc of said curve, through a central angle of  $16^{\circ}26'02''$ , an arc length of 557.26 feet to the Point of Beginning, said arc being subtended by a chord bearing and distance of South  $05^{\circ}59'20''$  East, 555.35 feet.

From said Point of Beginning, thence Southerly, continuing along said Westerly right of way line of County Road No. 15A and along the arc of a curve concave Easterly having a radius of 1942.86 feet, through a central angle of  $07^{\circ}06'19''$ , an arc length of 240.94 feet to the point of tangency of said curve, said arc being subtended by a chord bearing and distance of South  $17^{\circ}45'31''$  East, 240.78 feet; thence South  $21^{\circ}18'41''$  East, continuing along said Westerly right of way line, 2254.63 feet to its intersection with the Westerly right of way line of Telegraph Road (also known as Pacetti Road), a variable width right of way per occupation and maintenance: thence Southerly along said Westerly right of way line the following 5 courses: Course 1, thence South  $04^{\circ}27'17''$  East, departing said Westerly right of way line of County Road No. 15A, 1690.81 feet; Course 2, thence South  $00^{\circ}12'30''$  East, 114.76 feet; Course 3, thence South  $07^{\circ}08'02''$  West, 43.89 feet; Course 4, thence South  $09^{\circ}50'30''$  East, 32.68 feet to a point hereinafter referred to as Reference Point C; Course 5, thence continue South  $09^{\circ}50'30''$  East, 10 feet, more or less, to a point lying on the Southerly top of bank of Prescott Branch; thence Southwesterly, departing said Westerly right of way line and along the meanderings of said Southerly top of bank, 1339 feet, more or less; thence Northwesterly, continuing along said meanderings, 744 feet, more or less; thence South  $10^{\circ}26'09''$  East, 14 feet, more or less, to a point bearing South  $81^{\circ}07'14''$  West, 1812.34 feet from said Reference Point C; thence continue South  $10^{\circ}26'09''$  East, 17.12 feet to the Northeast corner of Lot 13 of Twin Oaks, an unrecorded subdivision; thence North  $74^{\circ}44'25''$  West, along the Northerly line of said Lot 13, a distance of 222.38 feet to the Northwest corner of said Twin Oaks; thence North  $32^{\circ}06'32''$  West, 1141.64 feet; thence North  $08^{\circ}25'02''$  East, 1274.47 feet; thence North  $13^{\circ}46'13''$  West, 280.62 feet; thence North  $75^{\circ}15'36''$  West, 141.35 feet; thence North  $17^{\circ}28'35''$  West, 971.34 feet; thence North  $16^{\circ}18'35''$  East, 452.49 feet to the Southerly most corner of Plant Site Parcel, as described and recorded in Official Records Book 3840, page 83, of said Public Records; thence Northeasterly along the Southeasterly line of said Plant Site Parcel the following 8 courses: Course 1, thence North  $59^{\circ}17'36''$  East, 208.66 feet; Course 2, thence North  $75^{\circ}51'53''$  East, 208.56 feet; Course 3, thence North  $09^{\circ}34'59''$  East, 188.72 feet; Course 4, thence



**Phase 1A (continued)**

North  $50^{\circ}13'09''$  West, 218.03 feet; Course 5, thence North  $45^{\circ}47'16''$  East, 142.42 feet; Course 6, thence North  $79^{\circ}15'12''$  East, 486.39 feet; Course 7, thence North  $13^{\circ}12'57''$  West, 103.23 feet; Course 8, thence South  $87^{\circ}53'01''$  East, 546.24 feet; thence South  $63^{\circ}42'58''$  East, departing said Southeasterly line, 466.19 feet to the Point of Beginning.

Containing 234 acres, more or less.

[THIS PAGE INTENTIONALLY LEFT BLANK]



