CURRENT TOPICS AND PRACTICES IN LAND-SECURED AND DEVELOPMENT FINANCE

MAY 22, 2024

POMONA, CA

Current Topics and Practices
IN LAND-SECURED AND DEVELOPMENT FINANCE





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CALIFORNIA DEBT AND INVESTMENT ADVISORY COMMISSION:
LAND-SECURED FINANCING CURRENT TOPICS AND PRACTICES

PROSPECTS FOR NEW LAND-SECURED FINANCINGS

CURRENT MARKET CONDITIONS UNIQUE:
PRICE APPRECIATION STRONG DESPITE HIGH MORTGAGE RATES!

WHEN WILL HOUSING MARKET RETURN TO NORMAL CONDITIONS?

BY
EMPIRE ECONOMICS, INC.
JOSEPH T. JANCZYK, Ph.D.

MAY 22, 2024

OVERVIEW OF PRESENTATION

Purpose: provide an economic-housing market framework that each of you can utilize for structuring various land-secured financings

1. There have been **two major macroeconomic factors** underlying housing price changes, but which one is **riskier?**

2. Since the onset of COVID-19, how have the **Federal Reserve Board (FRB) policies** impacted the housing market resulting in unique market conditions?

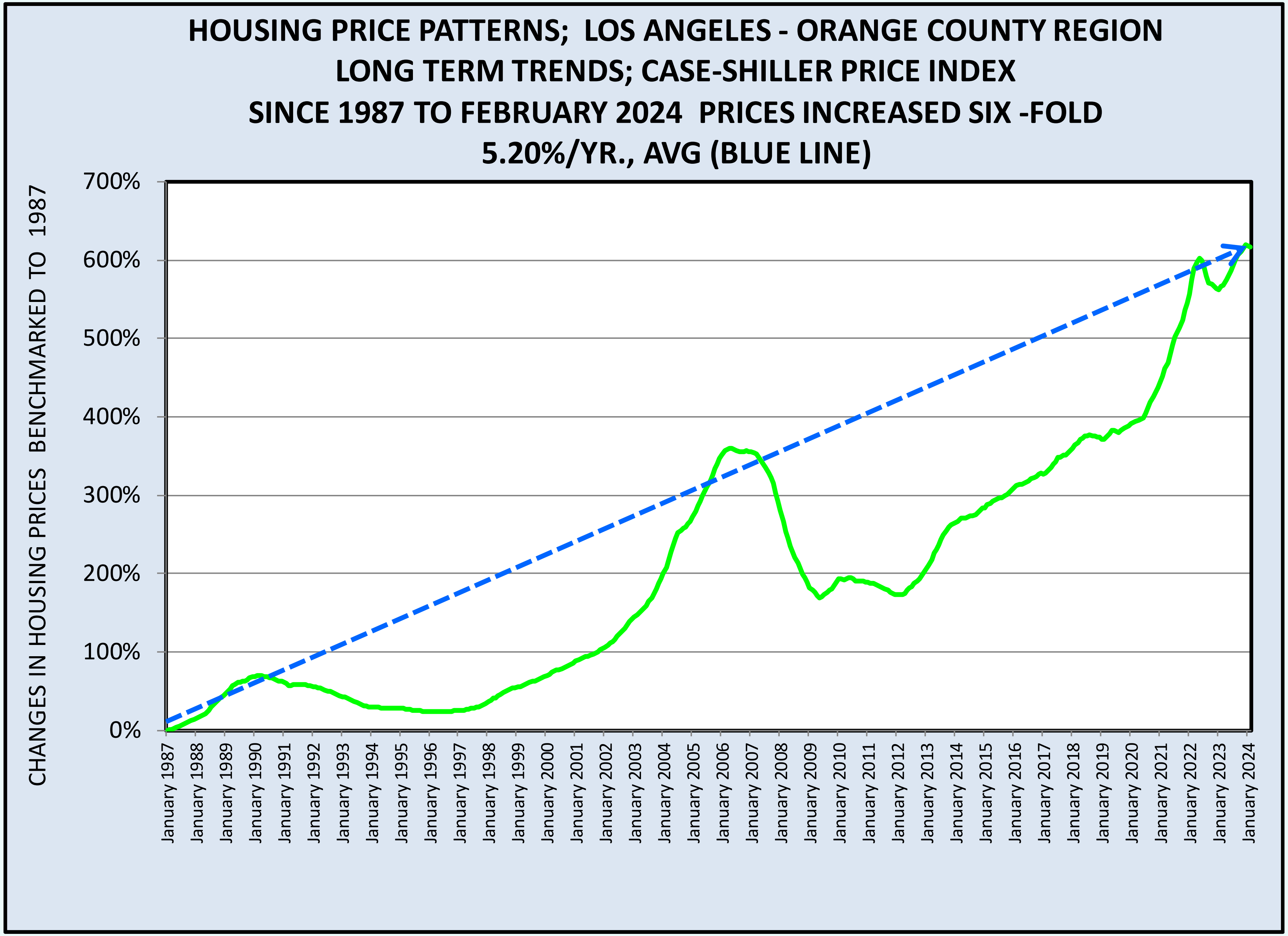
3. What types of **pricing structures** are being utilized by builders
   And how do these impact price point studies for setting special taxes?

4. **Conclusions:** looking ahead, what is likely to happen to residential values, and what types of safeguards should be considered for land-secured financings?

PART 1

There are **two major macroeconomic factors** underlying housing price changes,

But which one is **riskier**?


HOUSING PRICE PATTERNS; LOS ANGELES - ORANGE COUNTY REGION
LONG TERM TRENDS; CASE-SHILLER PRICE INDEX
SINCE 1987 TO FEBRUARY 2024 PRICES INCREASED SIX -FOLD
5.20%/YR., AVG (BLUE LINE)
CHANGES IN HOUSING PRICES BENCHMARKED TO 1987
700%
600%
500%
400%
300%
200%
100%
0%
January 1987
January 1988
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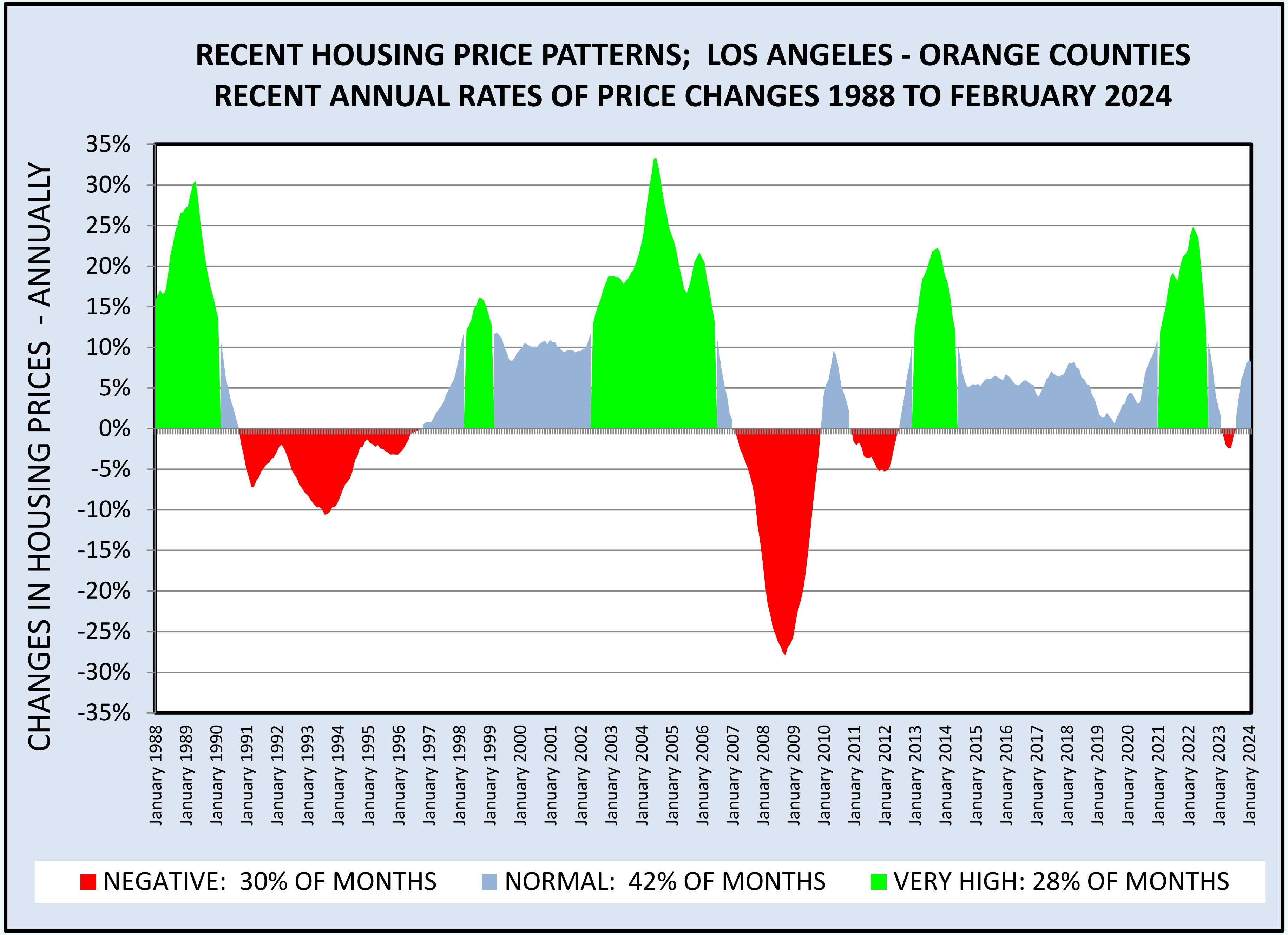
January 2024


RECENT HOUSING PRICE PATTERNS; LOS ANGELES - ORANGE COUNTIES
RECENT ANNUAL RATES OF PRICE CHANGES 1988 TO FEBRUARY 2024
CHANGES IN HOUSING PRICES - ANNUALLY
35%
30%
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15%
10%
5%
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-10%
-15%
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-30%
-35%
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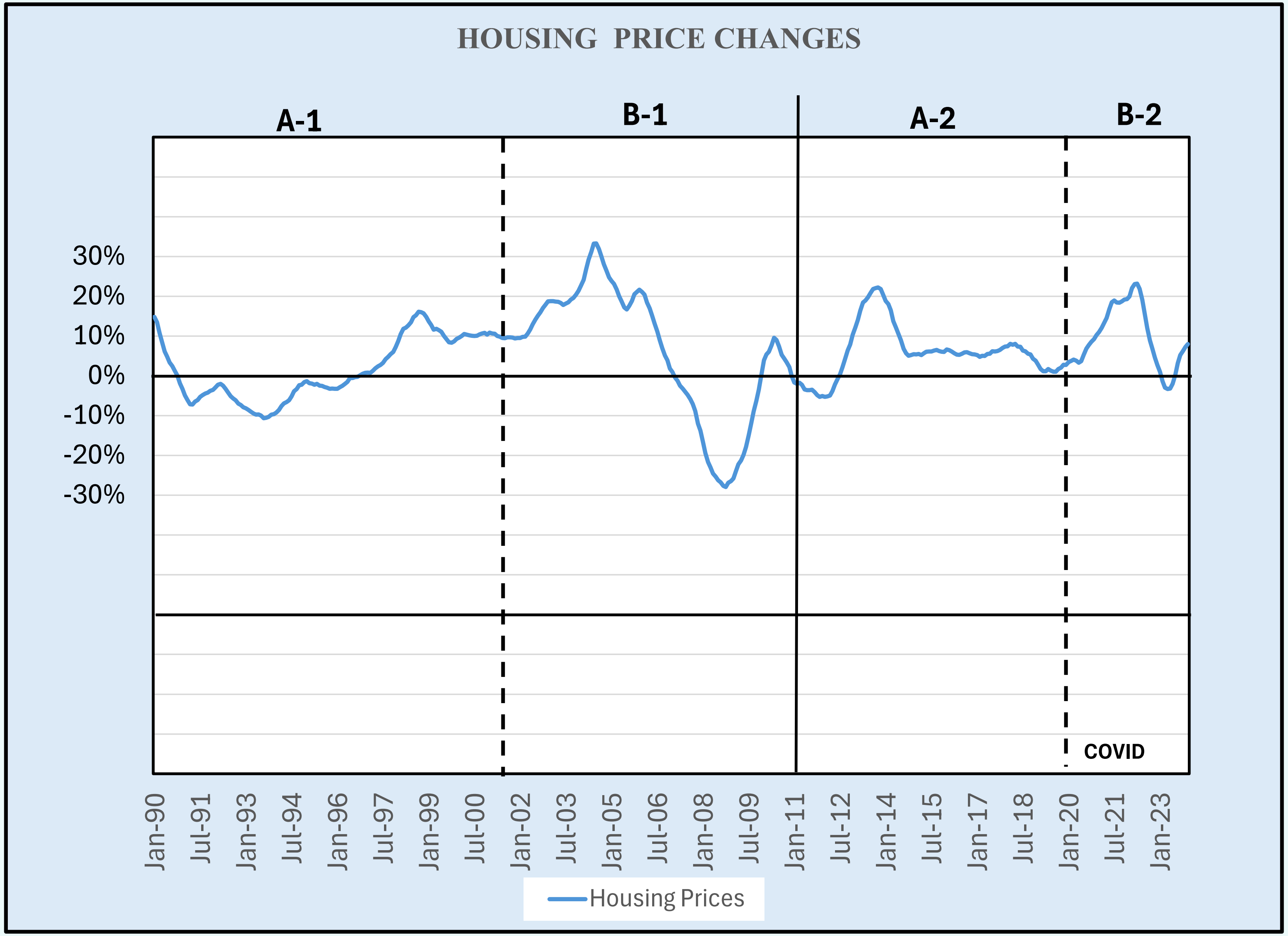
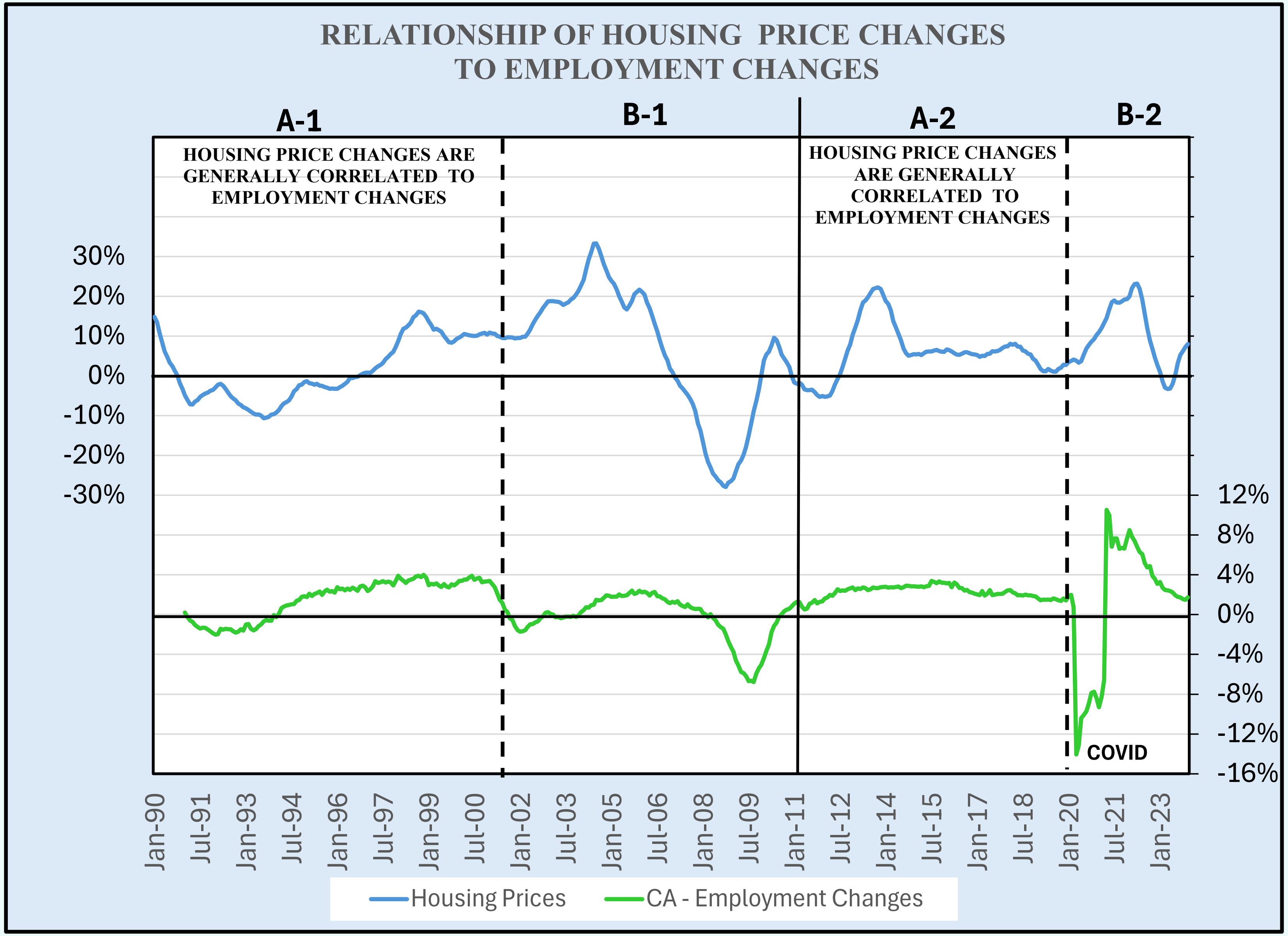
January 2021
January 2022
January 2023
January 2024
NEGATIVE: 30% OF MONTHS
NORMAL: 42% OF MONTHS
VERY HIGH: 28% OF MONTHS

HOUSING PRICE CHANGES 1990-2023



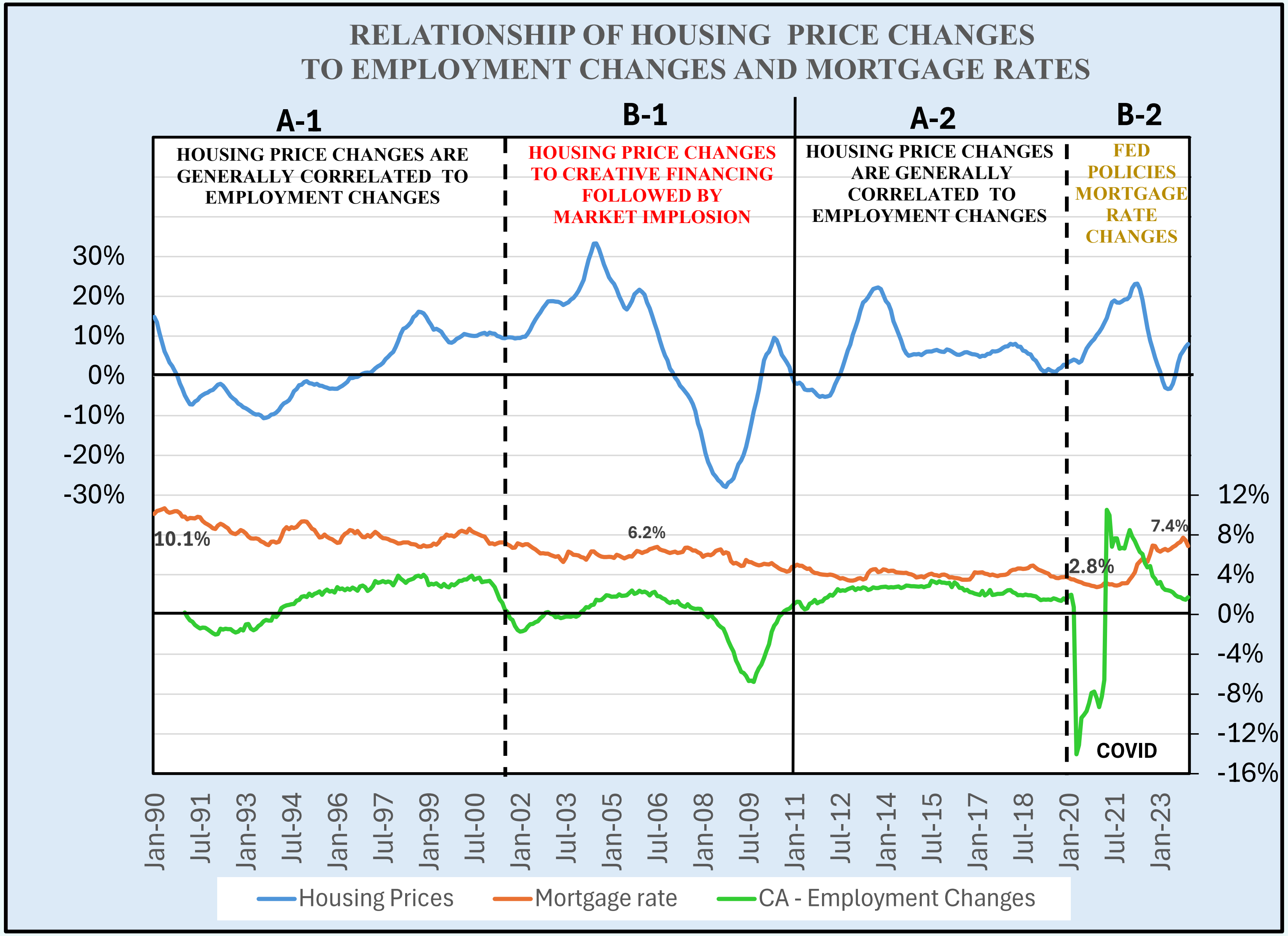
EMPLOYMENT CHANGES HAVE BEEN THE PRIMARY DRIVER OF PRICE CHANGES; 1990-2023



Employment changes have been the primary driver of price changes between 1990-2023

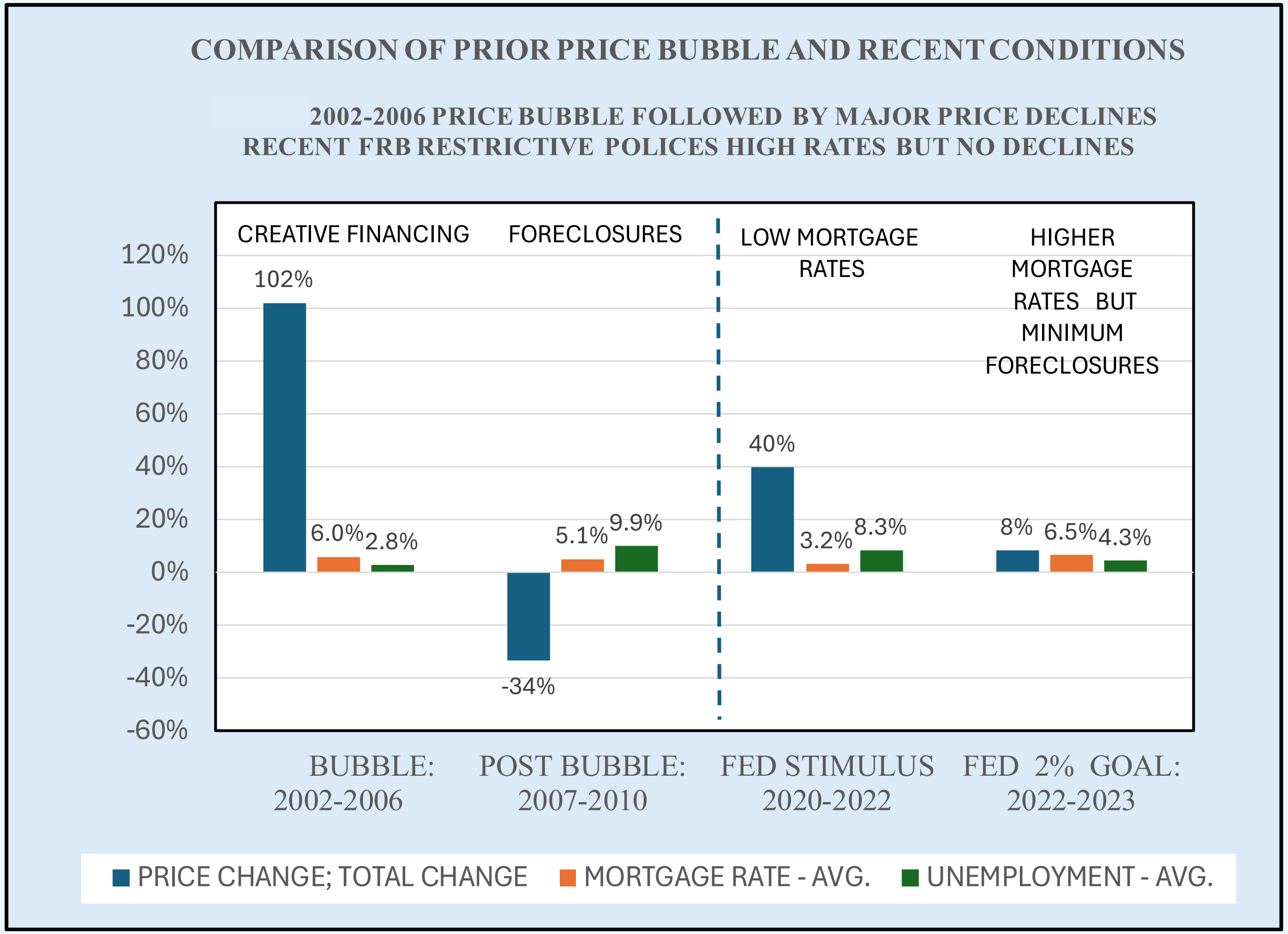
***Except* for creative financing (2002-2006)**

And recent historically low mortgage rates (2020-2021)



COMPARISON OF PRICE BUBBLE/IMPLOSION VS. RECENT HOUSING CONDITIONS

Creative financing between 2002-2006 followed by price declines and high unemployment
From 2022-2023, prices are stable despite high mortgage rates - low inventory



PART 2

Since the onset of COVID-19, how have **Federal Reserve Board (FRB) policies** impacted the housing market, **resulting** in unique market conditions?

FED POLICIES RESULT IN MAJOR CHANGES IN THE HOUSING MARKET FROM BURST OF ROBUST ACTIVITY TO CHALLENGING CONDITIONS

Federal Reserve Board (FRB) Policies Primary Driver of Economy and Housing Market
Mid-2020 To April 2022 - Housing Friendly

- FRB lowered interest rates and purchased mortgage loans AS WELL AS treasury bonds
- Robust housing price appreciation
- New and existing homeowners secured low mortgage rates

Since the April 2022 Peak Level – Housing Adversely Impacted

- Fed Restrictive Policies: Higher Interest Rates and Selling Mortgages from its Portfolio
- Higher Mortgage Rates
- Homeowners with Low Mortgage Rates Constrain Supply-Inventory

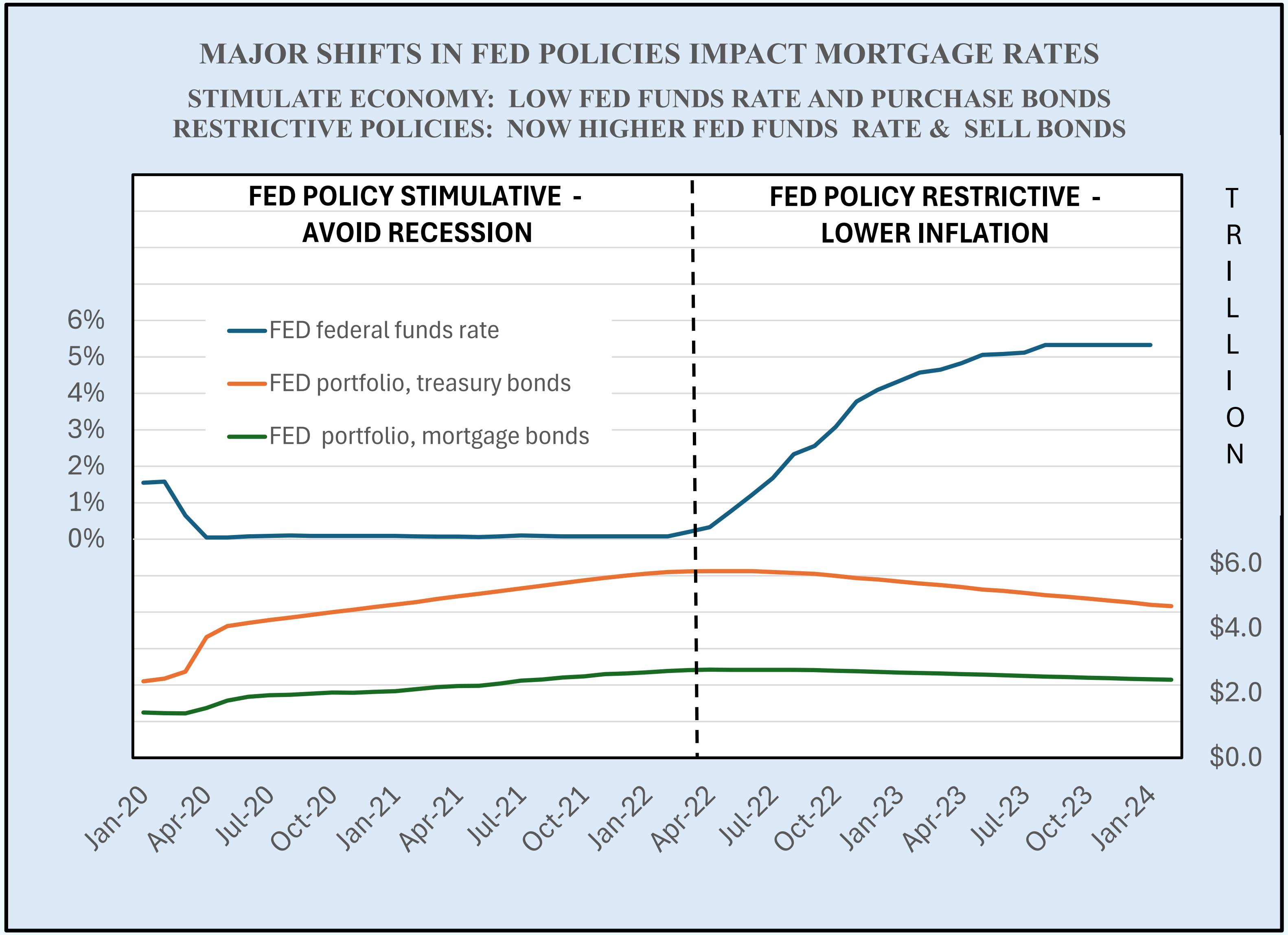
Outlook - FRB Goal of a 2% Inflation Rate

- Progress being made
- Expectation of a “soft economic landing” – no recession
- As the 2.0% goal is approached, mortgages rates decline BUT at a SLOW pace

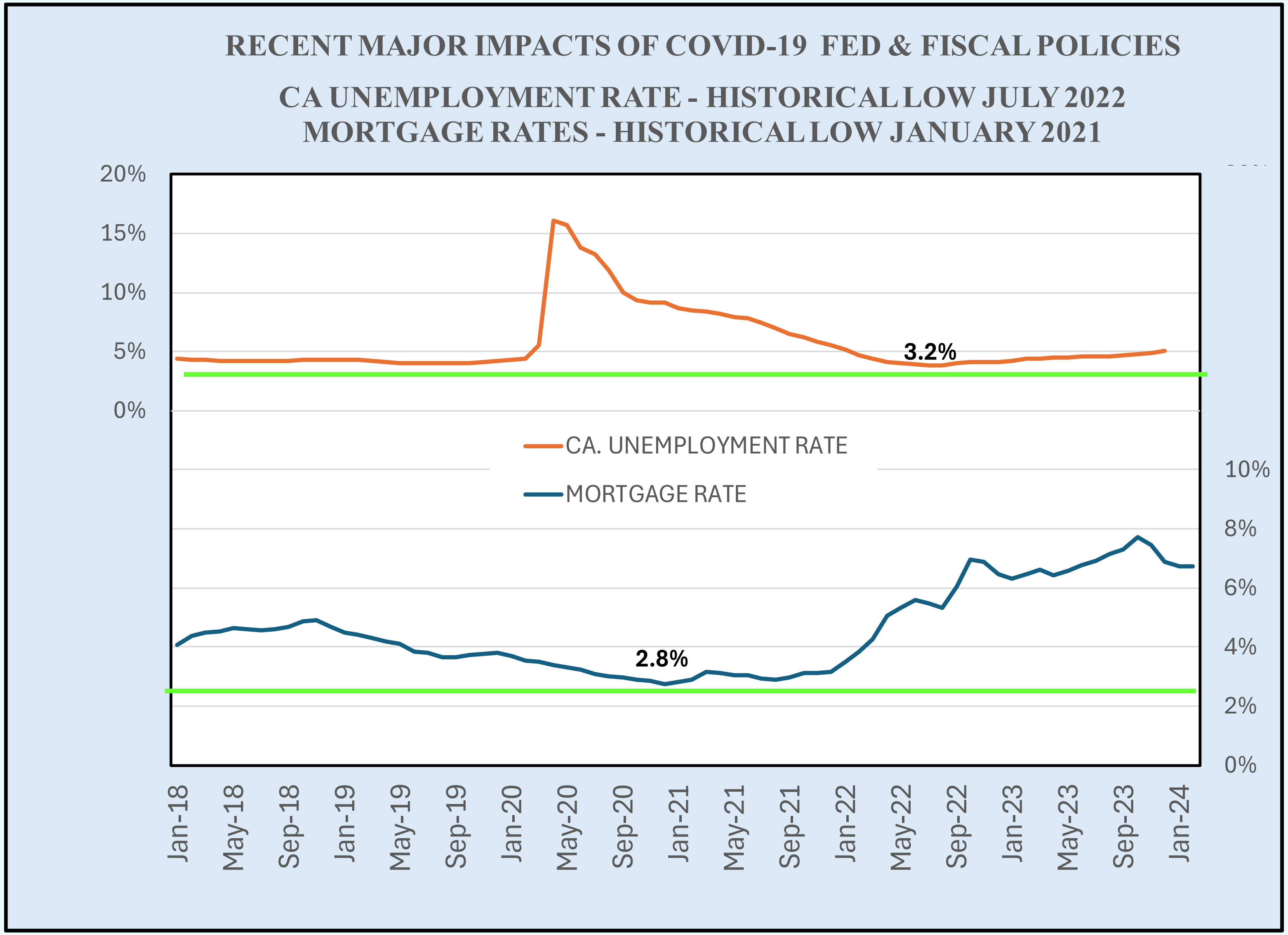
US-GDP is $28.2t while mortgage loans amount to $12.2t

The Fed stimulus policies provided an enormous financial windfall to homeowners securing low mortgage rates

FED POLICY SHIFT FROM STIMULATIVE TO RESTRICTIVE



MACROECONOMIC FACTORS: RECENT HISTORICAL LOWS FOR UNEMPLOYMENT AND MORTGAGE RATES 1990-CURRENT



TRENDS/PATTERNS FOR U.S. MORTGAGE RATES SINCE 2018

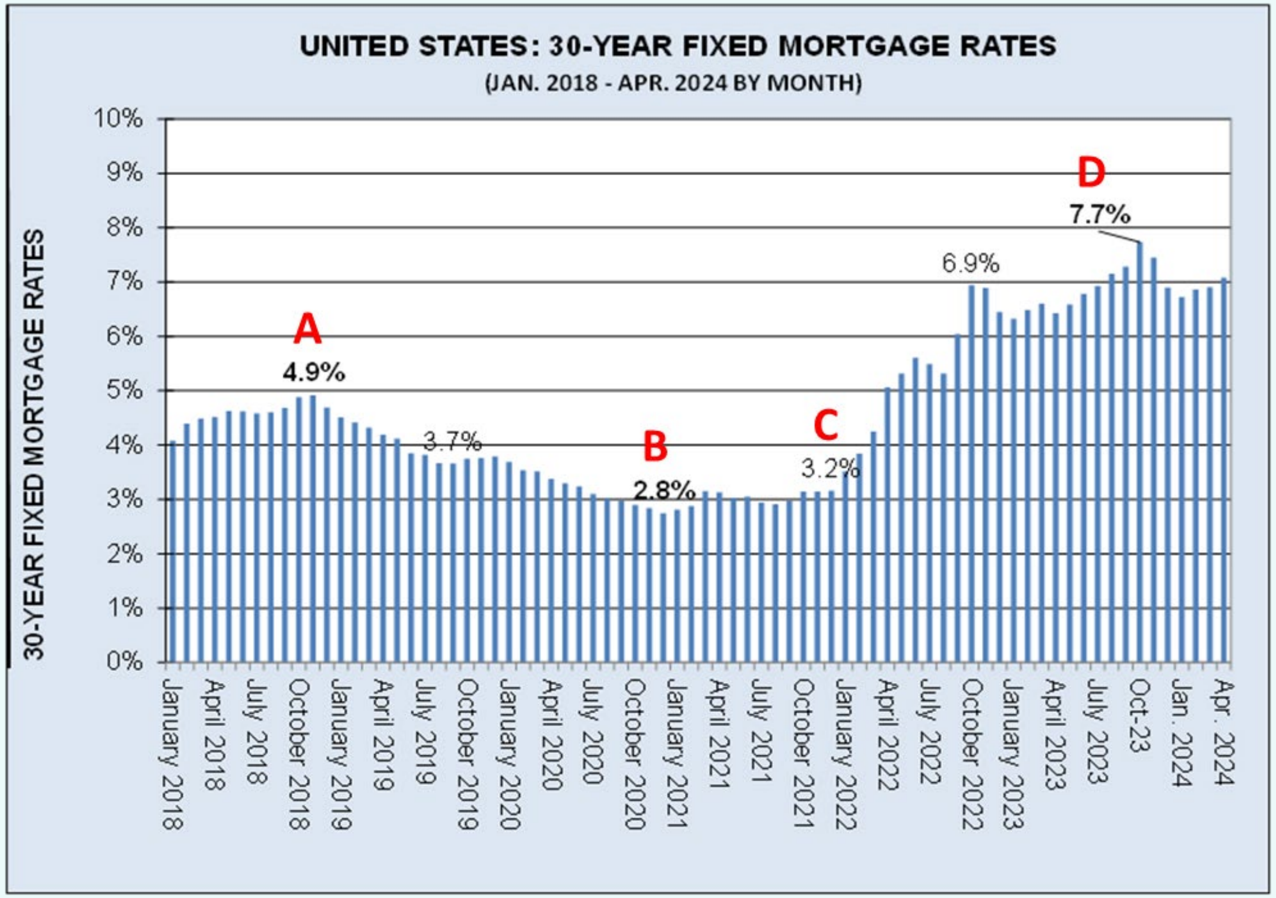
Mortgage rates are a secondary driver of housing demand; employment growth is typically the primary driver.

A. Mortgage rates peaked in November 2018 at **4.9%.**

B. Rates then declined to their **lowest level of 2.8% in January 2021** due to Fed policies stimulating the economy.

C. Rates remained at historically low levels, **below 3.2%, through December 2021**.

D. Due to Fed policies aimed at reducing inflation, **mortgage rates rose to 7.7% in October 2023**, but **recently were 7.1%.**



INLAND EMPIRE CITY HOUSING SUPPLY & DEMAND, AND PRICE APPRECIATION (JAN. 2018 – DEC. 2023)

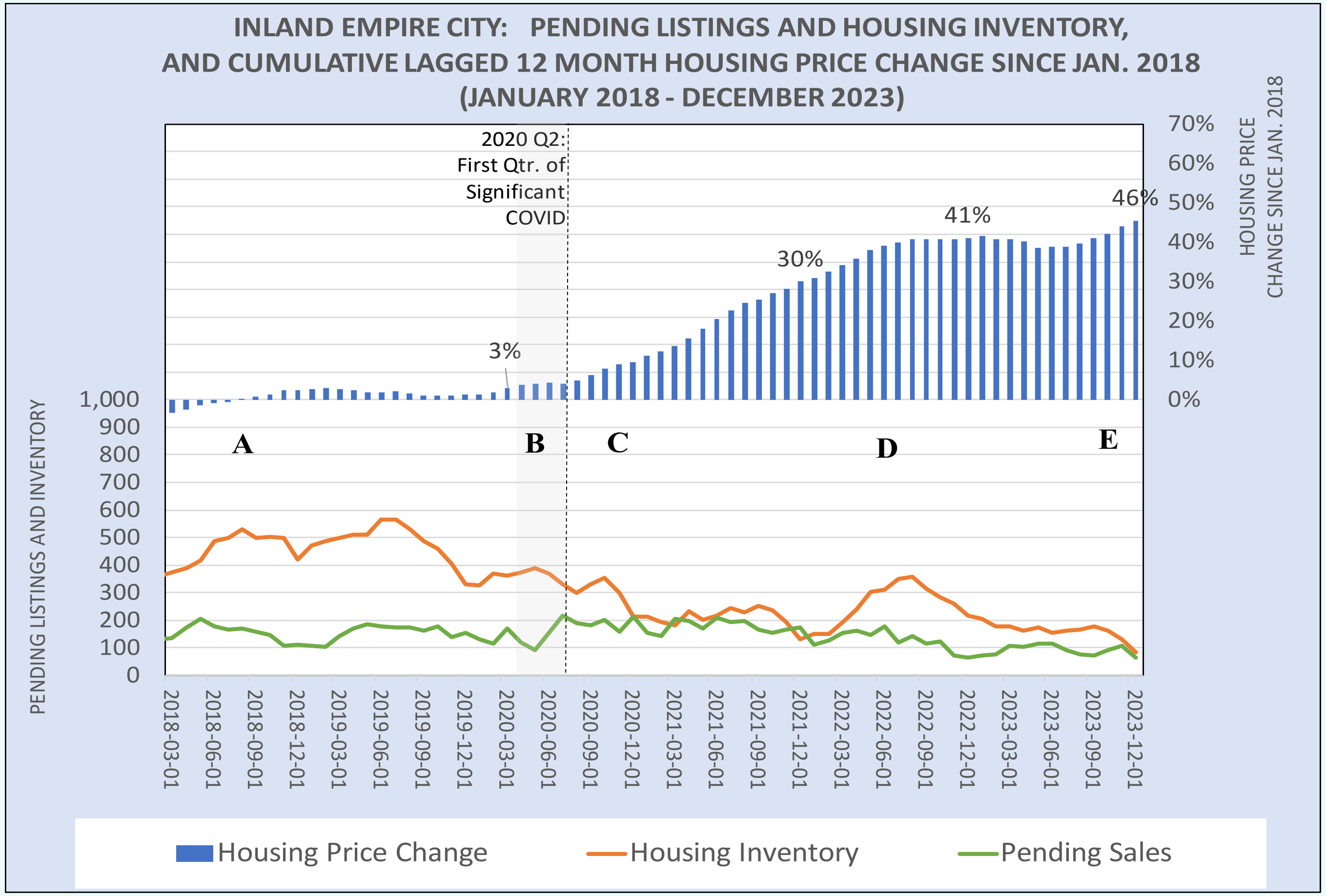
A. **In 2018 to early 2020**, the city housing inventory *(supply/orange)* **exceeded** pending sales **(demand/green), normal**

B. However, beginning in the **2nd quarter of 2020, housing demand and supply started to converge and met in 2021, COVID-19**

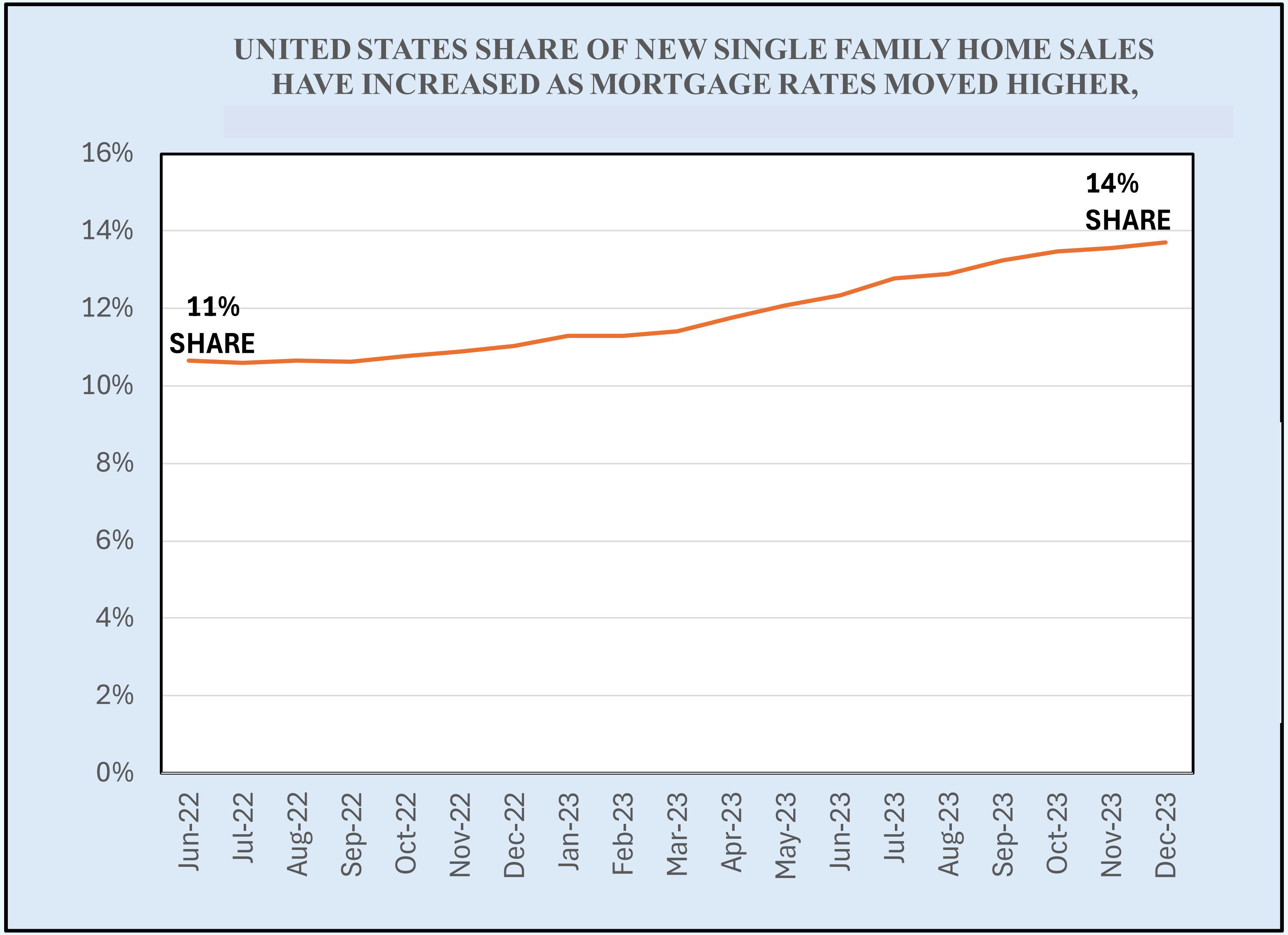
C. Once supply and demand curves started to converge, this resulted in a significant increase in **price appreciation**

D. **During 2022, inventory exceeded pending sales,** but inventory is still relatively low

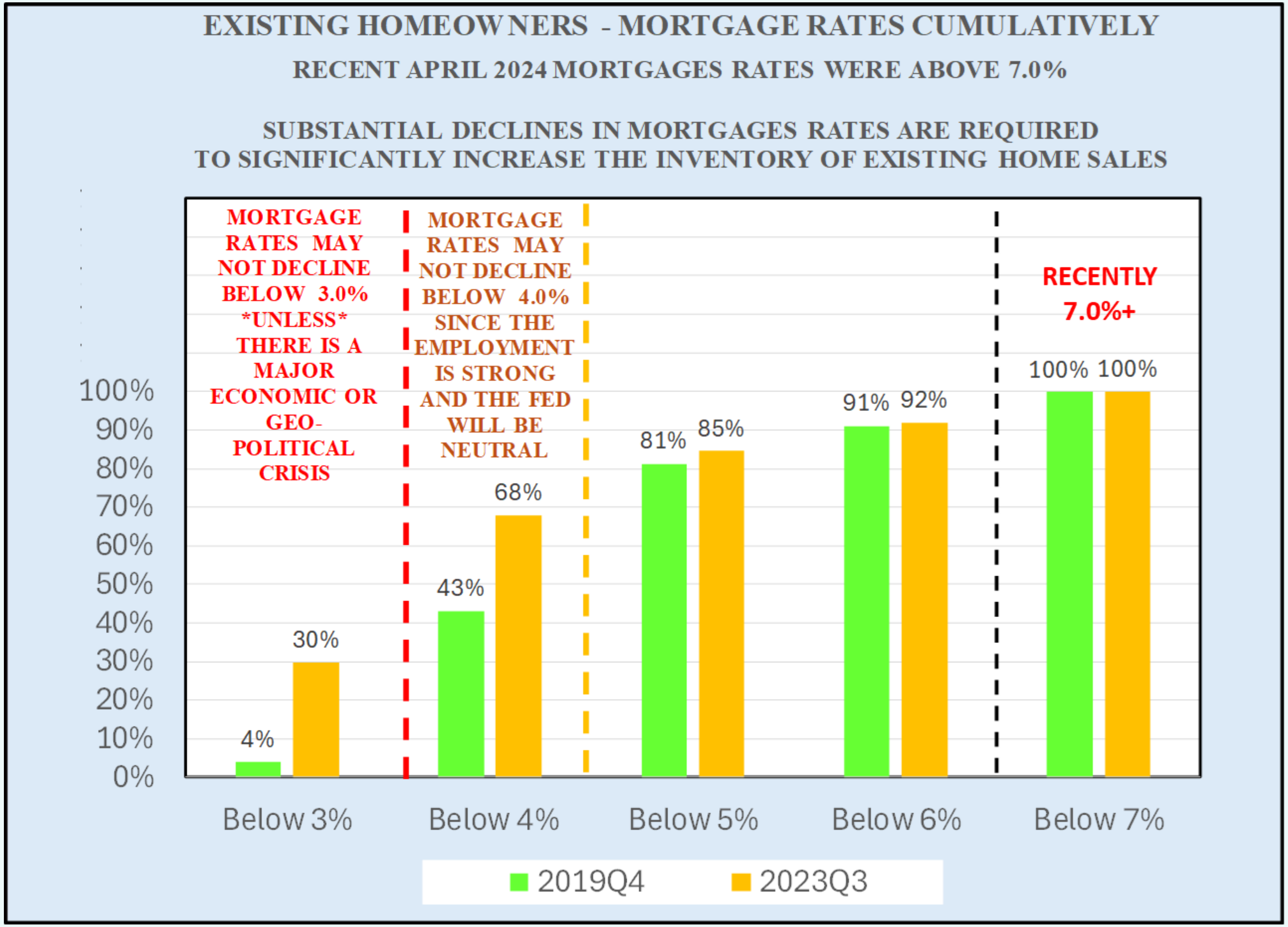
E. **During 2023, with high mortgage rates, inventory declined** and converged with low sales in December 2023.



SHARE OF U.S. NEW SINGLE-FAMILY HOME SALES



EXISTING HOMEOWNER MORTGAGE RATES BY CUMULATIVE COHORTS 2019Q4 AND 2023Q3



SOME FORECASTS OF MORTGAGE RATES

Empire Economics does not perform macroeconomic modeling of economics conditions that provide mortgage rate forecasts but does rely on such forecasts to analyze how various levels of mortgage rates are likely to impact the housing market.

The above analysis identified that declines in mortgage rates are a critical factor for increasing the market supply of for-sale homes as well as increasing demand as monthly payments become more affordable, thereby moving the market back to a "normal" balance of supply/demand.

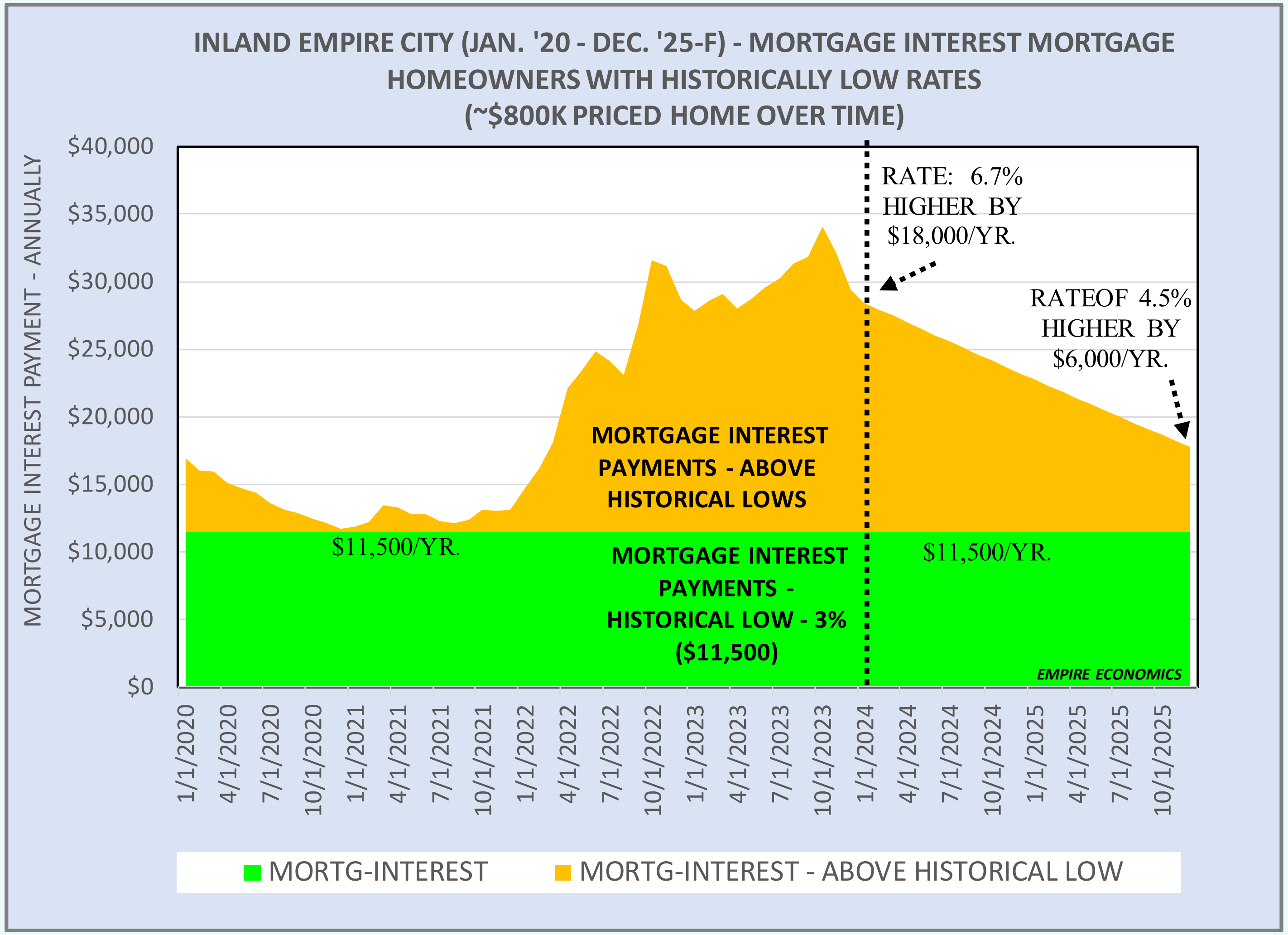
Accordingly, below are some forecasts from various organizations:

Forecasters (4/30/2024)	Q2 2024	Q3 2024	Q4 2024		Q1 2025	Q2 2025	Q3 2025	Q4 2025
Fannie Mae	6.7%	6.6%	6.4%		6.2%	6.1%	6.0%	6.0%
Mortgage Bankers Association (MBA)	6.7%	6.6%	6.4%		6.3%	6.2%	6.1%	5.9%
National Association of Realtors (NAR)	7.1%	6.7%	6.5%		6.3%	6.2%	6.2%	6.1%
Wells Fargo	7.1%	6.8%	6.5%		6.3%	6.2%	6.0%	5.9%

INLAND EMPIRE CITY – MORTGAGE INTEREST PAYMENTS (JAN. 2020– DEC. 2025F)

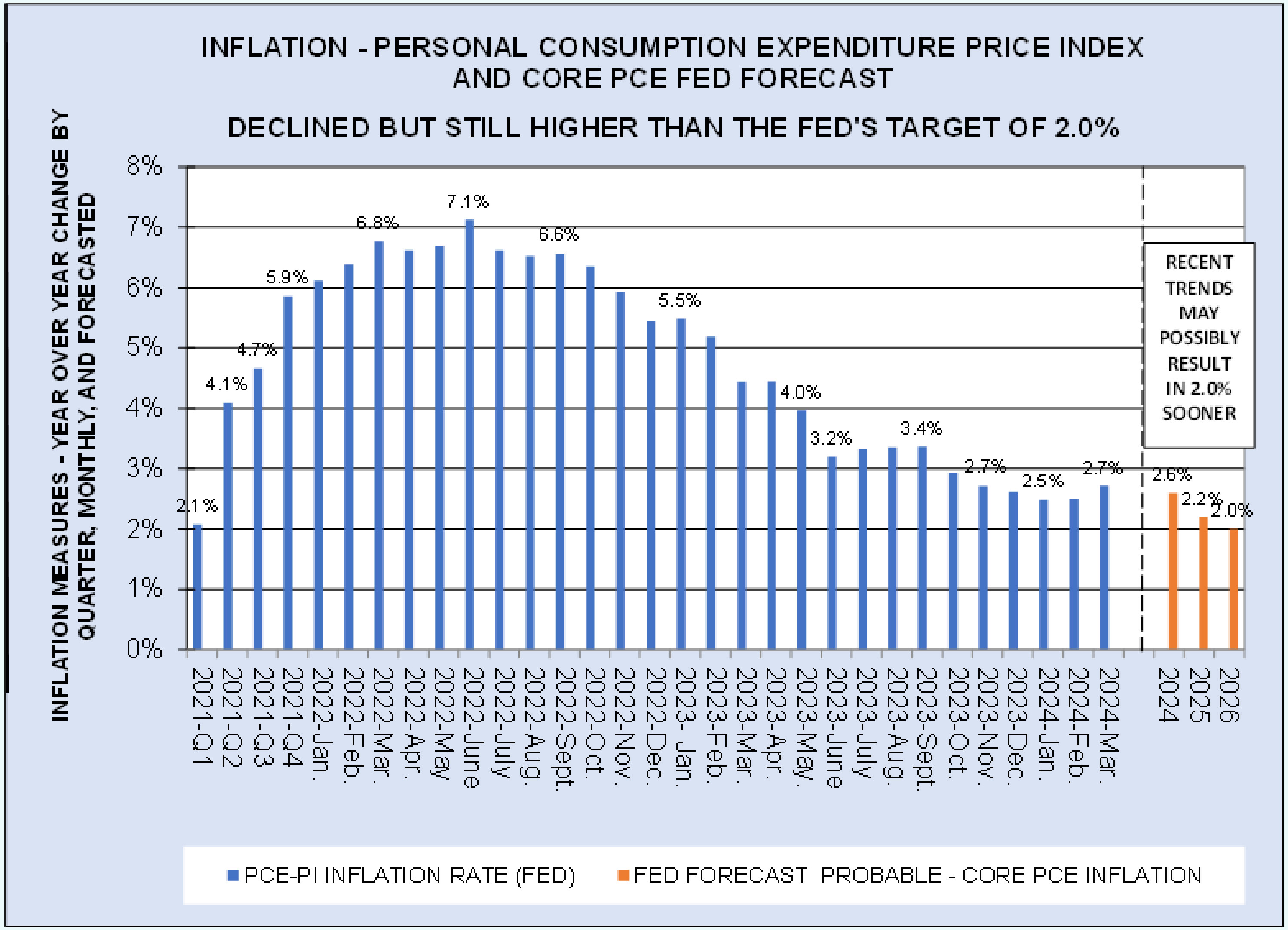
For a ~$800,000 house purchase, households that used a **3% mortgage rate in 2021** have mortgage interest rate payments of about **$11,500 a year**

As mortgage rates decline, the incentives for homeowners to stay in their current homes with historically low rates diminishes, and so the supply of homes for-sale increases.



CURRENT FRB MONETARY POLICIES EXPECTED TO REDUCE CORE INFLATION TO THE 2% GOAL BY 2026

Fed is adopting a conservative posture to ensure inflation remains low
Remaining vigilant as economy/employment is sturdy - soft landing
***** Mortgage rates will decline, but at a slow pace *****



SOURCE OF FED FORECAST (ORANGE BARS)

FEDERAL OPEN MARKET COMMITTEE, ECONOMIC PROJECTIONS, DECEMBER 13, 2023 TABLE 1 MEDIAN

RECAP → POETIC VERSION – AI

With each uptick in rates, demand took flight,
Yet those with low rates clung tight.

Nestled in dwellings with rates of yore,
Content in the homes they adore.
They watched the market with speculative eyes,
As excess demand pushed prices to the skies.

The Fed with its target, firm at two percent,
Aims for stability, that's their intent.
As rates recede, like a low tide's retreat,
Hope for buyers begins to replete.

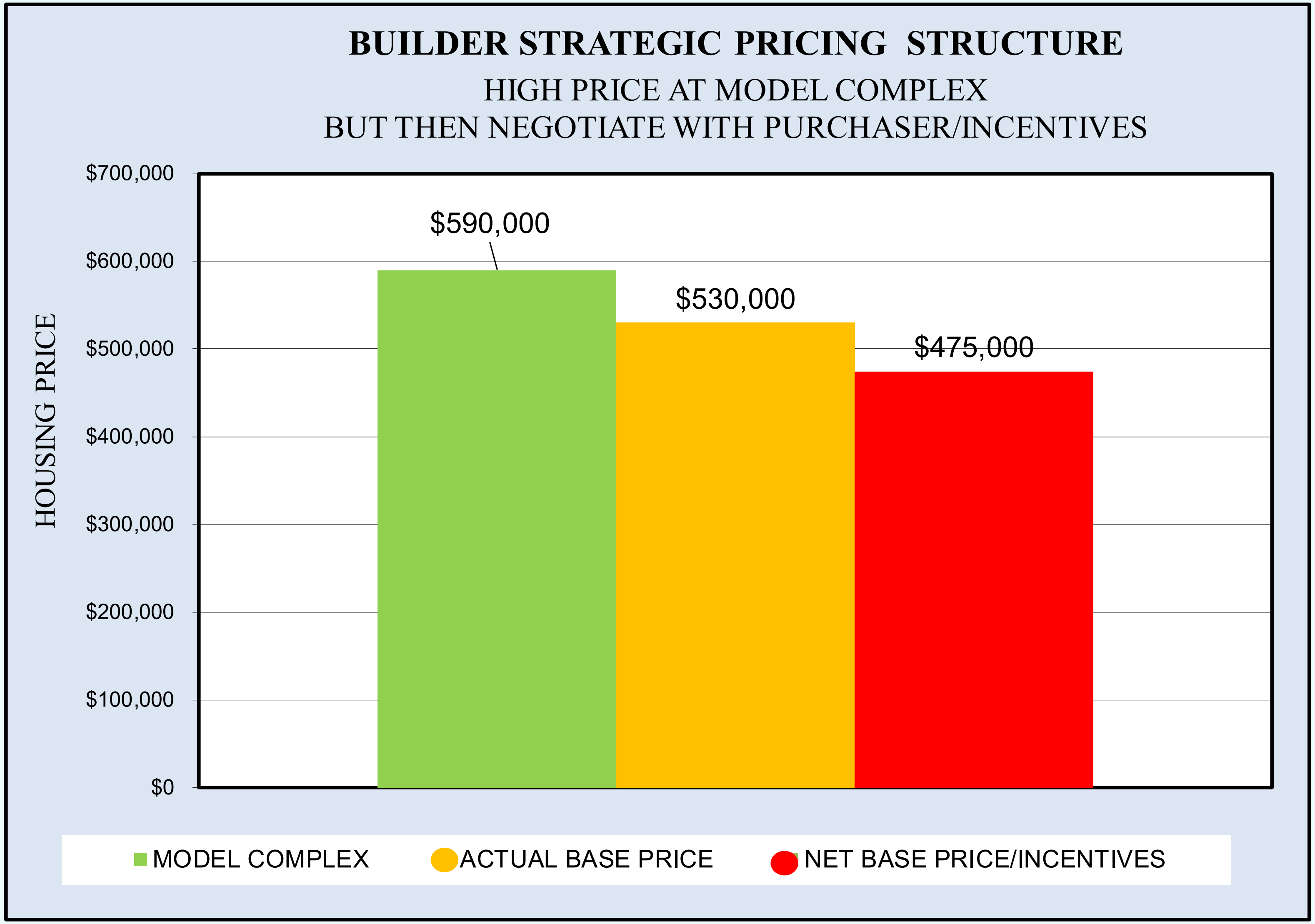
With the promise of rates that gently decline,
Dreams of ownership once more align.
Yet, as housing demand starts to renew,
The supply constricted, still options too few.

PART 3

What types of **pricing structures** are being utilized by builders?

How do these impact price point studies for setting special taxes?

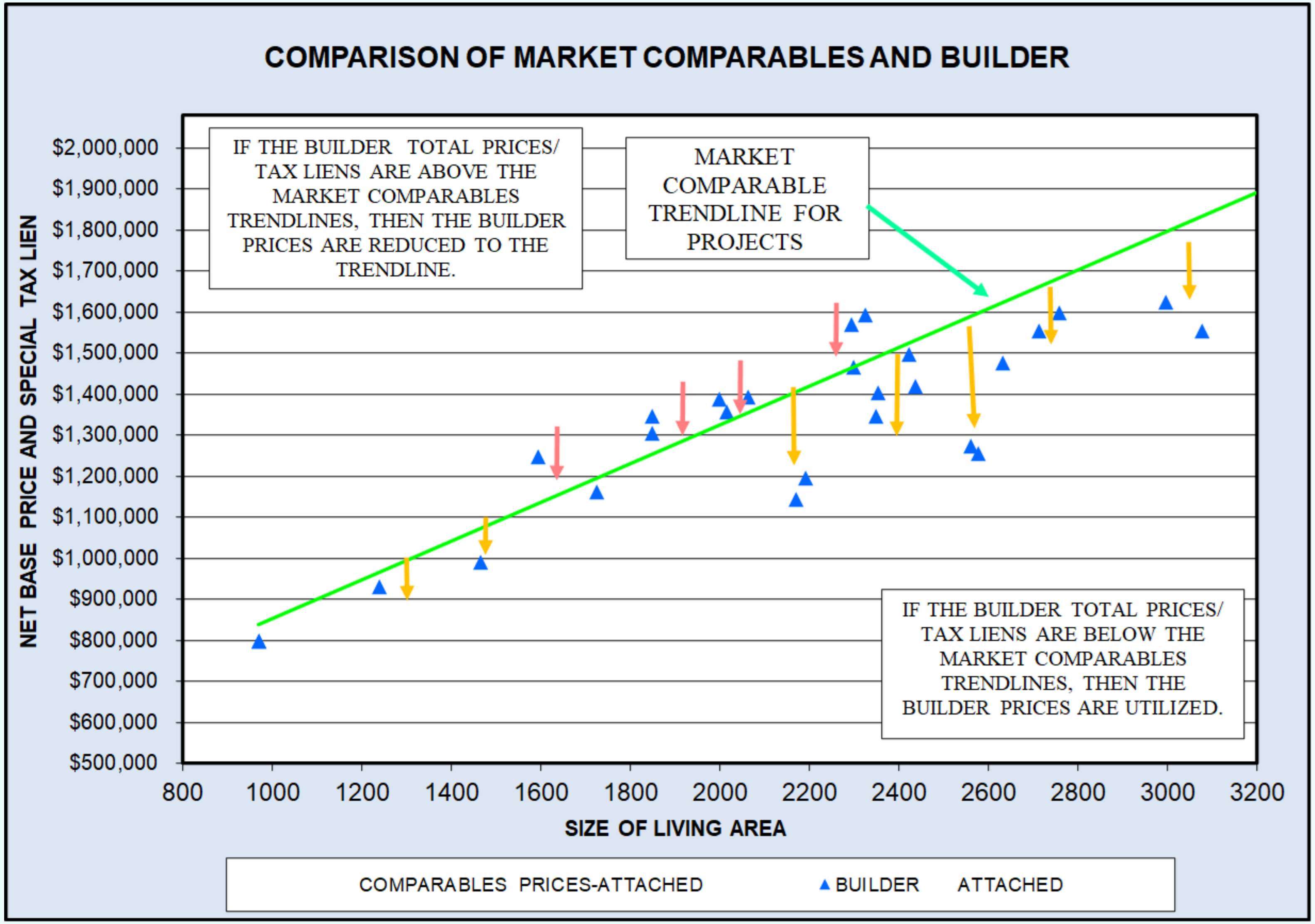
BUILDER STRATEGIC PRICING STRUCTURE



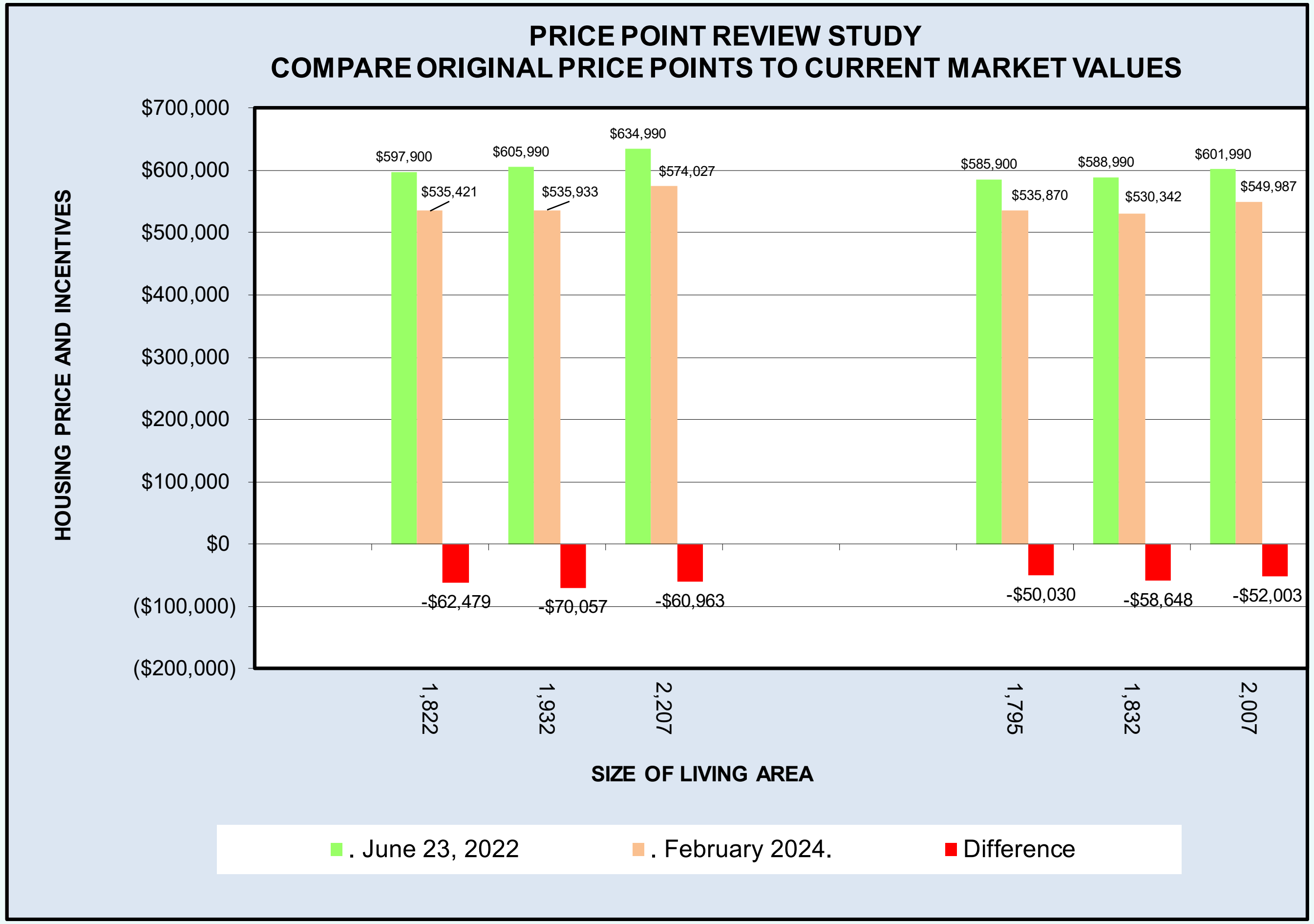
CURRENT PRICING STRATEGIES UTILIZED BY BUILDERS AND THE ESTIMATION OF "REAL" MARKET VALUE

- Model complexes offer homes for sale at base prices.
  - Builders reluctant to directly reduce base prices because of homes in escrow.
- If the rate of home sales is below expectations, then builders offer incentives.
  - Incentives include free upgrades, lower closing costs and mortgage assistance.
- Negotiations between the builder/purchaser result in a net sales price.
  - The net sales prices is the most accurate indicator of current market value.
- This valuation is Empire's Price Point for purpose of a public entities' CFD program.
  - This price is used to ensure compliance with the public entity's total tax burden.
- Hypothetically, if a resale were to occur immediately, it would be the net base price.

PRICE POINT STUDY FOR CFD FORMATION



PRICE POINT *REVIEW* STUDY PRIOR TO BOND SALE
COMPARE CURRENT MARKET VALUES TO ORIGINAL PRICE POINTS



"Price Point" means, with respect to each Project/Plan,
the estimated minimum base price:
*Deducting any incentives and concessions, including mortgage assistance.
*Excluding potential appreciation or premiums as well as free options or upgrades.

PART 4

CONCLUSIONS

Looking ahead, what is likely to happen to residential values, and what types of safeguards should be considered for land-secured financings?

A. **Price appreciation supported by employment growth provides a “substantive” foundation because newly employed households have the economic wherewithal to purchase homes.**

B. **Price appreciation due to financial factors is different**

1. **Housing price bubble (2002-2006)** price appreciation occurred due to creative financing which subsequently imploded resulting in numerous foreclosures.

B. Price appreciation due to financial factors is different (continued)

2. **Fed policy goal of 2%** inflation (2020-2023) initially utilized historically low rates to stimulate the economy but then restrictive policies to reduce inflation raised mortgage rates.

2-a **Higher mortgage rates** *reduces* both demand and supply, resulting in excess demand and price appreciation.

2-b **While lower mortgage rates** *increase* demand and even more so supply, this results in lower/stable prices, along with higher levels of sales.

Therefore, recent housing price increases have been driven primarily by financial mortgage rate factors, rather than employment growth.

Furthermore, forecasters expect mortgage rates to be above 6% through 3rd-qtr 2025.

Accordingly, public entities utilizing land-secured structures may want to consider integrating various **safeguards** into their financings such as **reasonable** levels of tax escalators, among others.

SESSION TWO

Legal and Legislative Updates In Land-Secured Finance

Bradley R. Neal, Partner, Stradling Yocca Carlson & Rauth, LLP

LEGISLATIVE UPDATES

The Taxpayer Initiative and Government Accountability Act (the "Taxpayer Initiative")

- Taxpayer Initiative that is on the November 2024 ballot.
- Intent is to increase transparency and accountability for all new taxes and other charges put to voters.
- Amends Articles XIII A and C of the California Constitution.
- Would require new or increased State taxes to be passed by a two-thirds legislative vote in each chamber <u>and</u> approved by a simple majority of voters.
- Would also increase the vote requirement for local taxes proposed by local government or citizens to a two-thirds vote of the local electorate.

Taxpayer Initiative (Continued)

- Retroactive effective date – January 1, 2022; May invalidate voter approved taxes approved after January 1, 2022 if not compliant with the Taxpayer Initiative.
- Requires that certain information re proposed new taxes or charges be placed <u>in the ballot measure</u>, including the type and rate of the tax, the duration of the tax, the use and estimated annual amount of the revenue generated by the tax.
- Mello-Roos Act requires a 2/3 vote to approve any Special Tax (One vote per acre if less than 12 registered voters with the proposed boundaries).
- Most CFD formation ballots do not contain all of the above information <u>in the ballot measure itself.</u>

Taxpayer Initiative (Continued)

COURT INTERPRETATION AND APPLICATION OF THE TAXPAYER INITIATIVE

- Courts would likely apply a “substantial compliance with the statute” approach.
- Landowner Waivers and Retroactive Affirmations
- Status of Challenges to the Legality of the Taxpayer Initiative

Other Legislation

AB 516 (Ramos) Mitigation Fee Act

(Gov't Code Section 66000 et. Seq.)

Amends Mitigation Fee Act to:

- Require that annual reports include certain additional information, such as identifying public improvements in previous annual reports and whether construction began on the date previously identified, and provide the reason for delay and a revised approximate date the local agency will commence construction for projects that did not begin timely.
- Require that local agencies provide certain information to anyone paying a fee, such as the right to request audits, the right to request written notice of the meetings where annual reports are approved and a link to the website where annual reports are available.
- Expand the purposes for which audits of fees may be requested.
- Effective January 1, 2024.

Other Legislation (Continued)

AB 557 (Hart) Brown Act Amendments

(Gov't Code Section 54950 et. Seq)

- Eliminates the January 1, 2026 sunset date on provisions of the Brown Act allowing local agencies to use teleconferencing without complying with specified Brown Act requirements during a proclaimed state of emergency.

- Effective January 1, 2024, the 'relaxed' teleconferencing rules established during COVID are still available when the Governor has proclaimed a state of emergency either statewide, or in the local agency's jurisdictional boundaries.

- Effective January 1, 2026, eliminates the ability of a member of a legislative body to use teleconferencing for a public meeting due to emergency circumstances or just cause.

- Effective January 1, 2024.

Other Legislation (Continued)

AB 1280 Fire Hazard Severity Zones Disclosures
(Civil Code Section 1103.2)

- Existing law generally requires the seller of a single-family residential property to make certain disclosures of natural hazards on a specified statement to a prospective buyer, including whether the property is in a very high fire hazard severity zone.

- AB 1280 requires that such disclosures now include high fire hazard severity zones as well.

- Clarifies that the natural hazard statement is required to include a disclosure as to whether the property is located within a high fire hazard severity zone in a state responsibility area, very high fire hazard severity zone in a state responsibility area, or very high fire hazard severity zone in a local responsibility area.

- Effective January 1, 2024.

Other Legislation (Continued)

SB 20 (Rubio) Regional Housing Trusts
(Gov't Code Section 6539.1)

- Authorizes cities, counties, and tribal governments to enter into joint exercise of powers agreements to form housing trusts.
- Legislature previously created five separate joint powers authorities as housing trusts by individual legislation.
- Authorizes regional housing trusts to:
  - Fund planning, acquisition and construction of housing for homeless populations and extremely low, very low and low income.
  - Receive public and private financing and funds.
- Authorize and issue bonds, certificates of participation, or any other debt instrument repayable from funds and financing received from such financing and funds and pledged by the regional housing trust.
- Sets certain requirements for board membership (minimum five directors, with three elected members from a local agency; two additional members expert in homeless or housing policy that are not elected officials).
- Effective January 1, 2024.

Other Legislation (Continued)

Assembly Constitutional Amendment No. 1

- Statewide initiative placed on the November 5, 2024 ballot by the California legislature.

- If passed, ACA-1 would lower the voting threshold for certain city, county and special district general obligation bonds and special taxes from two-thirds to 55%.

- Bond proceeds would need to be used for construction, reconstruction, rehabilitation, or replacement of public infrastructure, affordable housing, or permanent supportive housing for persons at risk of chronic homelessness, including persons with mental illness, or the acquisition or lease of real property for public infrastructure, affordable housing, or permanent supportive housing for persons at risk of chronic homelessness, including persons with mental illness.

- Would apply to all elections that occur on and after November 5, 2024, and would require the creation of a bond oversight committee and annual performance and financial audits.

JUDICIAL UPDATES

Sheetz v. County of El Dorado, CA (SCOTUS, April, 2024)

- U.S. Supreme Court decision regarding traffic impact fees and the Takings Clause of the Fifth Amendment to the U.S. Constitution ("nor shall private property be taken without just compensation.")
- Sheetz owned a parcel in rural El Dorado and applied for a building permit to build a small house.
- Due to a recent increase in traffic congestion, the County had instituted a traffic impact fee for building permits; the traffic impact fee was not based on the impact on traffic of a particular project but on a rate schedule based on the type of project and the location in the County (i.e., residential, commercial).
- Sheetz paid the traffic impact fee under protest, and filed an action in state court claiming that conditioning the building permit on paying the traffic impact fee was an unconstitutional "exaction" under the Takings Clause.
- Supreme Court held for Sheetz, holding that there is no difference between administrative and legislative conditions on land-use permits, and must be an "essential nexus" between the permit condition and the government's land use interest.

JUDICIAL UPDATES (Continued)

Alliance San Diego v. City of San Diego (2023) (occupancy tax)

- Upheld finding that the general requirement that special taxes be approved by a two-thirds vote does not apply to citizen-sponsored initiative measures; hinted that “too much government involvement can mean an initiative is really presented by the local government” rather than by a citizen-led initiative.

County of Alameda v. Alameda County Taxpayers’ Association, Inc. (2024)

- In June 2018, the County submitted a failed sales tax ordinance to the voters.
- Prior to the November 2018 election, the Board of Supervisors considered the same tax for a lesser term but tabled proposal after discussing the possibility of a “signature gathering campaign for the 2020 election.”
- Petition was circulated for the March 2020 primary election, with a Supervisor as a proponent and her chief of staff as the principal officer for the campaign committee.
- Court upheld the tax based on simple majority vote and explicitly disagreed with the implication in the *Alliance San Diego* court that “too much government involvement can mean an initiative is really presented by the local government” rather than by a citizen-led initiative.

JUDICIAL UPDATES (Continued)

Traiman v. Alameda Unified School District (2023)

- Measure A, a school district parcel tax, was placed on the March 2020 ballot by the Board of Education and approved by the voters.
- Imposed a special parcel tax for seven years at a rate of $0.265 per building square foot not to exceed $7,999 per parcel and at the rate of $299 per vacant parcel.
- Government Code Section 50079 requires that special taxes "apply uniformly to all taxpayers or all real property within the school district, except that unimproved property may be taxed at a lower rate than improved property."
- Court of Appeal held that the per parcel cap did not impermissibly create classifications in violation of Section 50079 because the cap "does not transform a permissible square footage tax into a tax that is not uniformly applied."

JUDICIAL UPDATES (Continued)

Davis v. Fresno Unified School District (2023)

- School district entered into a lease-leaseback arrangement with a contractor pursuant to Education Code Section 17406 for the construction of a school site.
- Construction was funded with the proceeds of previously issued general obligation bonds.
- Taxpayer within the school district brought a reverse validation action.
- Court of Appeal held the lease-leaseback arrangement was not subject to judicial validation under Code of Civil Procedure Section 860, et. seq., because it was not a “contract” within the meaning of Government Code Section 53511.
- Given the source of financing (GO bond proceeds), the lease-leaseback arrangement was not “in the nature of, or directly related to, a public agency’s bonds, warrants or other evidences of indebtedness.”

SEC UPDATES

David Sanchez, SEC Director of the Office of Municipal Securities
Closing Remarks at SEC Compliance Conference

- David Sanchez delivered closing remarks at the SEC Compliance Conference on December 7, 2023.
- In these remarks Mr. Sanchez highlighted areas of concern in the public finance market.
- Of particular interest in the remarks is the assertion by Mr. Sanchez that municipal advisors, broker-dealers and attorneys have “gatekeeping” and other responsibilities which, in the SEC’s view, are not being met in certain circumstances.

SEC UPDATES (Continued)

David Sanchez Remarks at SEC Compliance Conference, Continued

- Mentions the "emergence and reemergence of certain deal structures" that have come under scrutiny, including housing deals for essential workers and students, taxable forward refundings, and tenders.
- Mentions that "certain municipal entities have been ceding authority for issuing conduit bonds to privately-run entities that are the leading issues of defaulted bonds."
- The SEC is also concerned with the number of municipal entities choosing to do negotiated sales as opposed to competitive sales.
- Mentions municipal advisors helping issuers determine method of sale.
- Also broker-dealers' obligations to disclose conflicts of interest with respect to secondary market sales to affiliates.

SEC UPDATES (Continued)

David Sanchez Remarks at SEC Compliance Conference, Continued

- Discusses municipal advisor activity conducted by persons and entities who failed to register:
  - P3 advisors and other participants in P3 space.
  - Attorneys, particularly for private placements.
  - Non-bank participants in lease financings and private placements.
  - Charter school advisors.
  - Special tax consultants.
  - Vendors who embed financing in equipment sales.
  - State and local associations of governments that promote for compensation certain financing packages.

SEC UPDATES (Continued)

David Sanchez Remarks at SEC Compliance Conference, Continued

- Recent cybersecurity rules adopted by the SEC for public companies.
- Guidance from the Government Finance Officers Association on environmental disclosure best practices.
- Closed remarks by mentioning anti-fraud liability can include many members of the deal team, and stressing the importance of ensuring complete, fair and accurate disclosure.

SEC UPDATES (Continued)

SEC v. City of Rochester, New York (2024)

- SEC civil enforcement action brought against the City of Rochester, the City's former Director of Finance and the City's municipal advisors, Capital Market Advisors, LLC ("CMA").

- Municipal Advisors are required to comply with the rules of the Municipal Securities Rulemaking Board ("MSRB"), including Rule G-42 which requires disclosing all material conflicts of interest.

- SEC alleged CMA failed to comply with relevant MSRB rules and breached their fiduciary duty to the City by not disclosing that its fees arrangement, which were contingent upon the sale of bonds and dependent in whole or in part on the size of the bond issuance, presented a material conflict of interest.

- Summary Judgment granted in favor of the SEC.

15-MINUTE

BREAK

Session Three

District Formation: Considerations and Strategies

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CURRENT TOPICS AND PRACTICES IN LAND-SECURED AND DEVELOPMENT FINANCE | MAY 22, 2024 POMONA, CA

Land-Secured Districts at a Glance

Two types of districts, but CFDs are the focus of this presentation

Assessment District (AD)

- **1913 Act (district formation)**
- **1915 Act (bond issuance)**
- **Requires 50+% support**
- **Assessments must be spread proportionally to "special benefit"**

$\Rightarrow$Burden of proof on issuer results in potential litigation risk

$\Rightarrow$*Less frequently used option*

Community Facilities District (CFD)

- **Mello Roos Act of 1982**

$\Rightarrow$Adopted in wake of Proposition 13

- **Requires 2/3rds approval**

$\Rightarrow$By electorate if 12+ registered voters in the district, otherwise by landowners, weighted by acreage

- **Tax spread on a "reasonable" basis**

$\Rightarrow$*Most frequently used option*

Preparing for District Formation

- **Internal Organization**
  - Which departments will be involved?
  - Who is the primary contact person?
  - How will policy issues be vetted?
  - Is the team aware of all existing agreements and entitlements?
  - Are there any political issues related to the developer or the development?
  - Does the issuer already have established Goals and Policies for Land-Secured Districts?

Preparing for District Formation

- **Establish Resources for Formation**
  - Dedicated staff time
  - Deposit from developer(s)
  - Organize consulting team
    - Legal counsel
    - Financial advisor
    - Special tax consultant
    - Bond underwriter

Preparing for District Formation

- **<u>Documentation of Deal Points</u>**
  - Development Agreement or Disposition and Development Agreement
  - Financing Plan/Implementation Document
  - Term Sheet negotiated between parties to inform:
    - Acquisition Agreement
    - Rate and Method of Apportionment (RMA)
    - Bond Indenture/Fiscal Agent Agreement

Preparing for District Formation

- **<u>Comprehensive Funding Strategy</u>**
  - Is there an adopted Financing Plan?
  - Is the CFD/AD to act in conjunction with other mechanisms?
    - Infrastructure Financing District (IFD)
    - Impact Fee Program
  - How does funding of public services fit in?
  - What is the timing of required infrastructure and services?

Preparing for District Formation

- **<u>Coordination with Affected Agencies</u>**
  - Factor in existing or proposed financing districts
  - Consider approved but unissued general obligation bonds
  - Joint Community Facilities Agreements (JCFA)
  - Joint Powers Agencies

Preparing for District Formation

- **<u>Developer initiated process</u>**
  - Most common circumstance
  - Property owners may file petition to initiate CFD
  - Developer provides a deposit for non-contingent costs

- **<u>Issuer initiated process</u>**
  - Sometimes used for large, broad districts for a tax spread not tied to ad valorem
    - i.e. Santa Cruz countywide CFD for Libraries, Altadena Library District CFD

Preparing for District Formation

- **Choice of Issuer**
  - Typically city, county, school district or special district
    - At least 51% of bond-funded projects must be owned by sponsoring public agency
  - Alternatively may be a financing authority
    - Local agency (i.e. River Islands or Tejon Ranch)
    - Conduit issuer (i.e. CSCDA, CMFA)

⇒ *Governance and marketing effectiveness vary for each*

Understanding Developer's Plan

- **Application from Developer(s)**
  - Project information: land uses, timing, values
  - Land ownership information
  - Financial information
  - Deposit
- **Financing District Proposal**
  - Special tax categories and rates
  - Improvement areas/future annexation areas
  - PayGo, extended term, transition
  - Facilities and services to be funded
  - Number and timing of bond issues

Developers' Objectives for Financing

- **Maximize net construction proceeds for infrastructure**
  - Two percent (2%) special tax escalator
  - Limit special tax for services
  - PayGo, extended term
- **Minimize burden on undeveloped property**
  - Capitalized interest
  - Phasing of bond sales
  - Maximum levy on developed property
- **Limit future discretionary actions that affect funding capacity**
- **Flexibility for changes in land use, infrastructure plans, and maximum special tax rates**

Core Documents Needed for Formation

1) Boundary Map

2) Rate and Method of Special Tax Apportionment (RMA)

3) Eligible Facilities

4) Acquisition Agreement and any Joint Facility Agreements

Formation Considerations: District Boundaries

- Can be tailored to areas of political support or development phase

- Can be non-contiguous

- Only property within the District and subject to the special tax is included within property valuation

- Bigger is better from a credit perspective but smaller provides more flexibility and control for a developer

Formation Considerations: Structure of District

- **Separate CFDs, or improvement areas or tax zones**
  - How similar are distinct phases of project?
  - What is the likelihood that the development plan or product mix may change?
- **Considerations with multiple landowners**
  - Cross-collateralization
  - Oversizing and corresponding reimbursements
- **Future annexation areas can be used for flexibility**

Improvement Areas (IAs)

- Separate geographic areas within one CFD
- Separate RMA for each improvement area
- Separate bond issues for each improvement area (usually)
- Changes within an IA require vote of electors only in IA
- IAs can be established at CFD formation or added upon annexation into CFD
- Provides for “bite-sized” pieces of a project

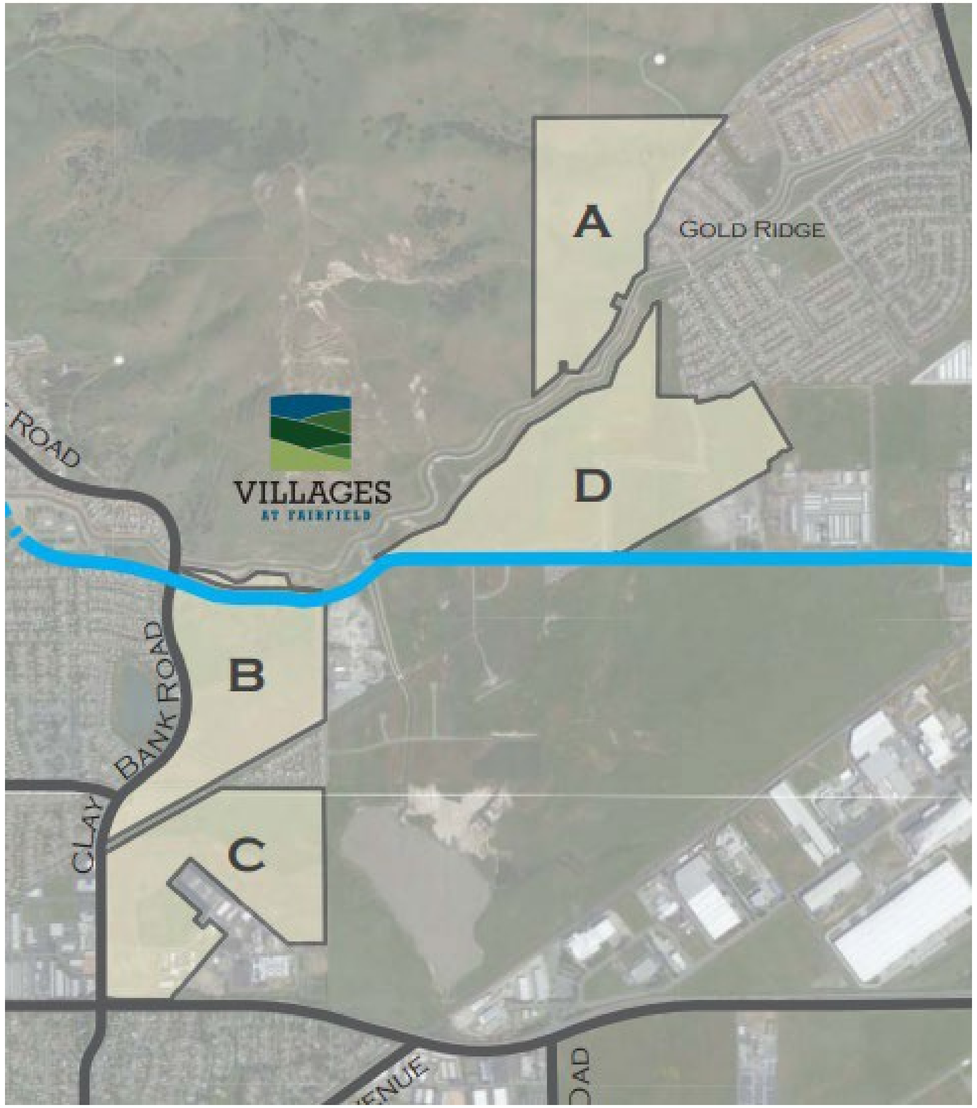
Future Annexation Area

- One or more parcels in initial CFD boundaries
- Any property that might join the CFD in the future is designated as Future Annexation Area in CFD boundary map
- "Election" is a signature on a "Unanimous Approval Form"
  - May include maximum tax rates different than those in other areas of CFD
  - Each annexation could have a different maximum tax rate if warranted
- No meetings of legislative body are required for annexation
- Low cost, accelerated annexation procedure

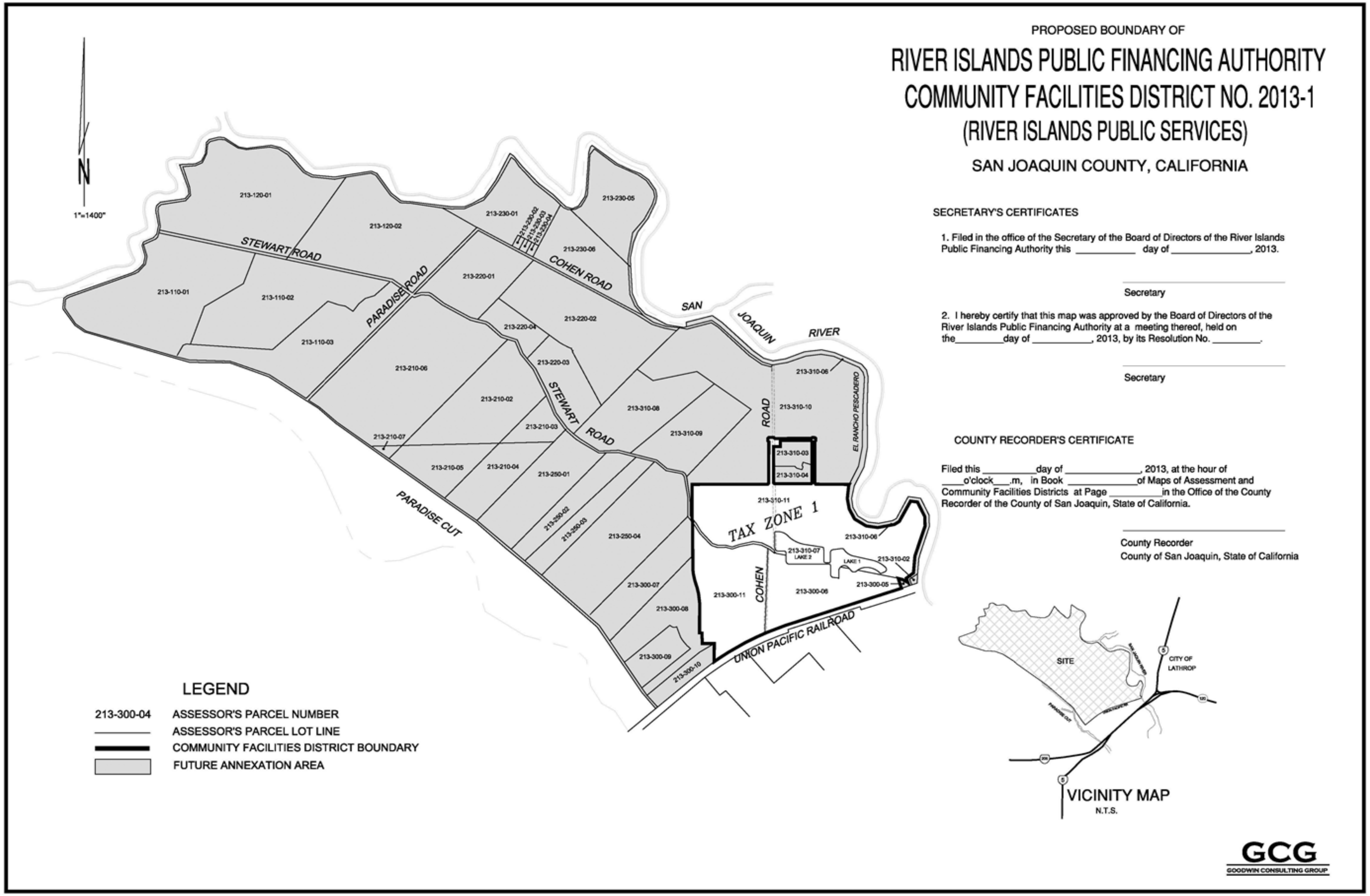
Improvement Areas for Each Project Phase

City of Fairfield
CFD No. 2016-1
(Villages of Fairfield)

- One CFD
- Distinct improvement areas (IAs) by project phase
- 3 IAs annexed to date
- 3 separate securities
- One "brand" in market



CFD with Future Annexation Area

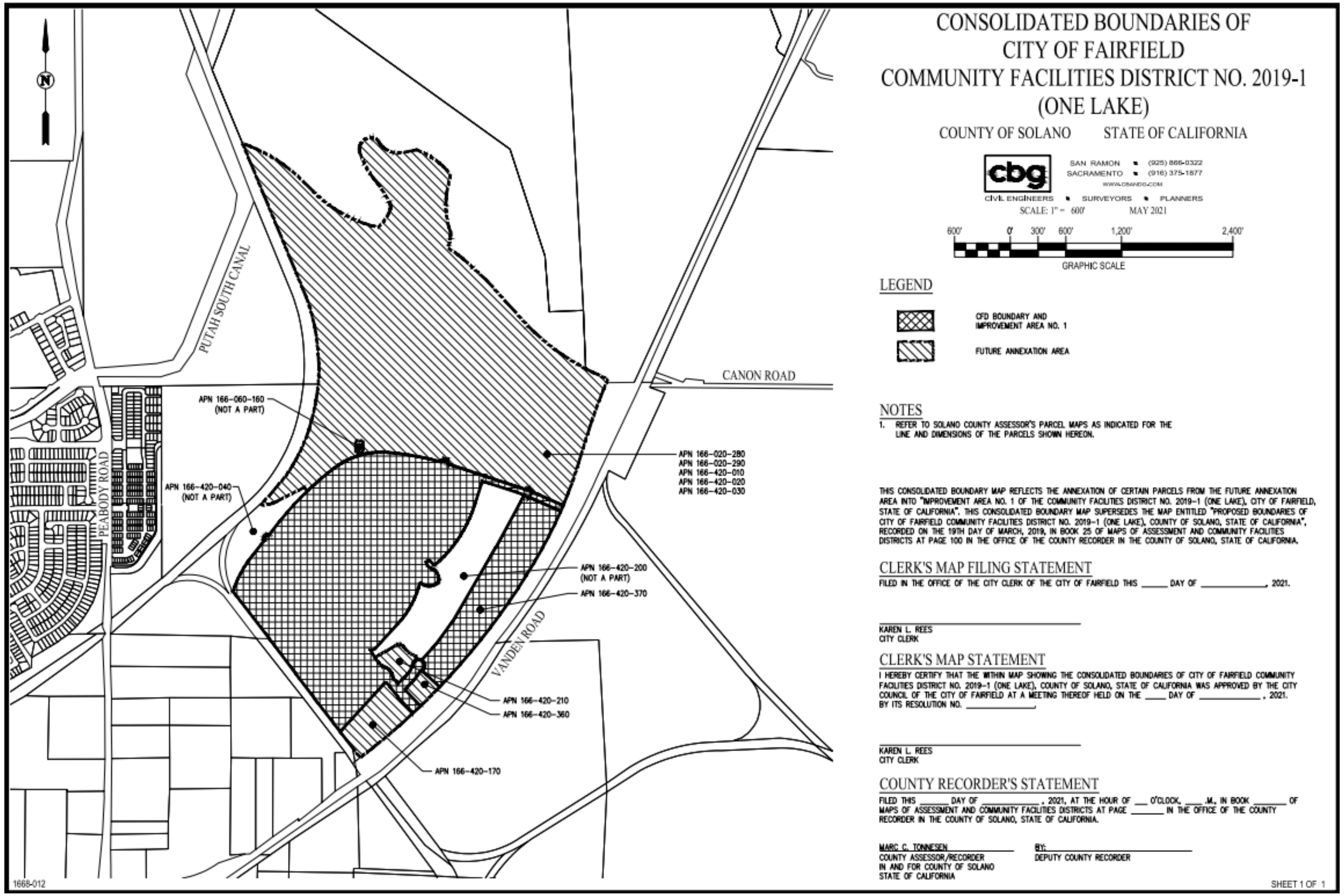


Flexibility to Annex - *or Not*

City of Fairfield CFD No. 2019-1 (One Lake)

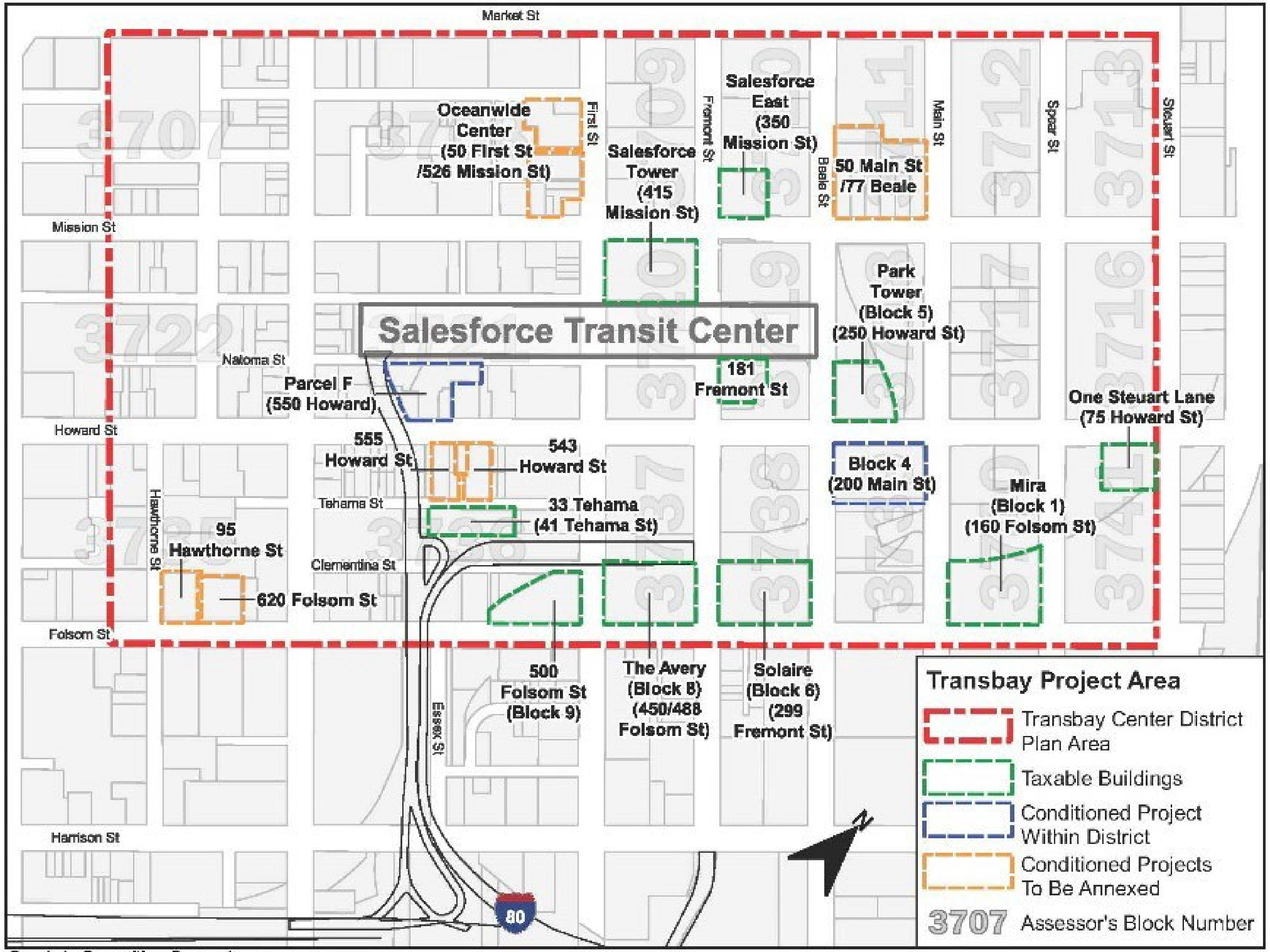
- Phase 1 in IA No. 1
- Phase 2 in Future Annexation Area

- *Subsequent decision to create a separate CFD for Phase 2*



Non-Contiguous CFD and Future Annexation Area

- Non-contiguous parcels
- Future Annexation Area overlaps up-zoned land use planning area
- Additional annexations from into the CFD on a *parcel* basis



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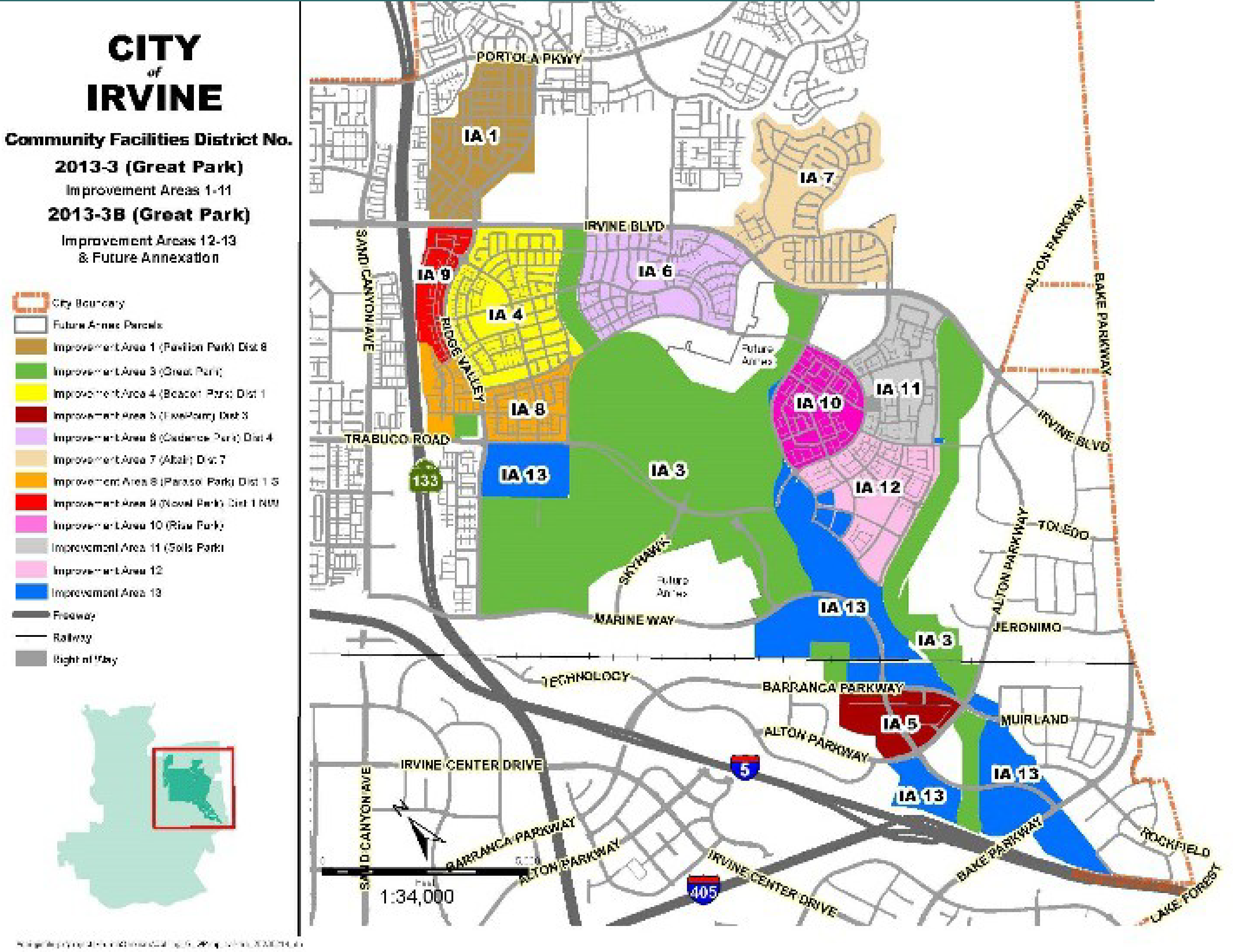
Mix of Separate Districts and Improvement Areas

- **Irvine's Great Park**
  - Former Marine Corps Air Station closed in 1999
- **Development plans**
  - 10,500+ residential units
  - 4.8 million sq. ft. of commercial, retail, industrial, and R&D space
- **Two large CFDs**
  - More than 13 improvement areas formed to date
  - Future Annexation Area



Formation Considerations: Special Tax Structure

- **Categories and maximum tax rates**
  - Market rate vs. affordable units
- **Term, transition, escalators**
- **PayGo**
- **Backup special tax mechanism**
- **Prepayment options**

Services Special Tax

- Annual stream of revenues to fund public services
- Usually levied in perpetuity
- No legal limit on annual escalation
- Often implemented to mitigate fiscal deficits projected in a fiscal impact analysis
- Include component for CFD administration costs
- Reduces capacity to fund public infrastructure

Allocating Tax Capacity

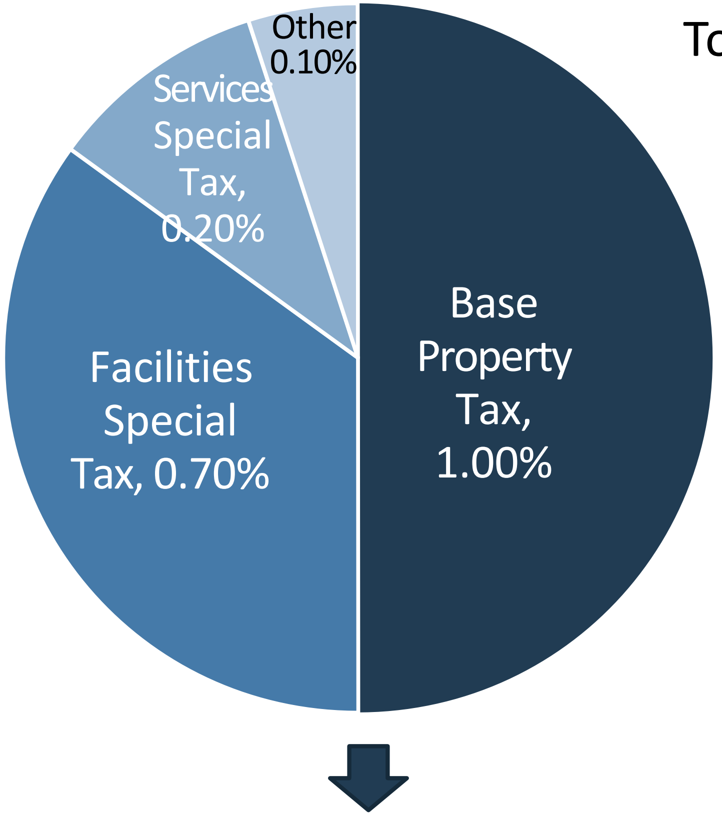
- Services Special Tax vs. Facilities Special Tax
- Sharing tax capacity among multiple public agencies
- Timing of funding needs
  - Facility, services, maintenance needs, now and in the future
  - Timing of funding needs for each public agency
- All-in Tax Burden
  - Up to 2% of estimated home value for residential property
  - “Reasonable” rates for commercial uses
  - Includes 1% base property tax rate, plus any GO overrides, services tax, other special taxes and assessments

Illustrative All-In Tax Burden

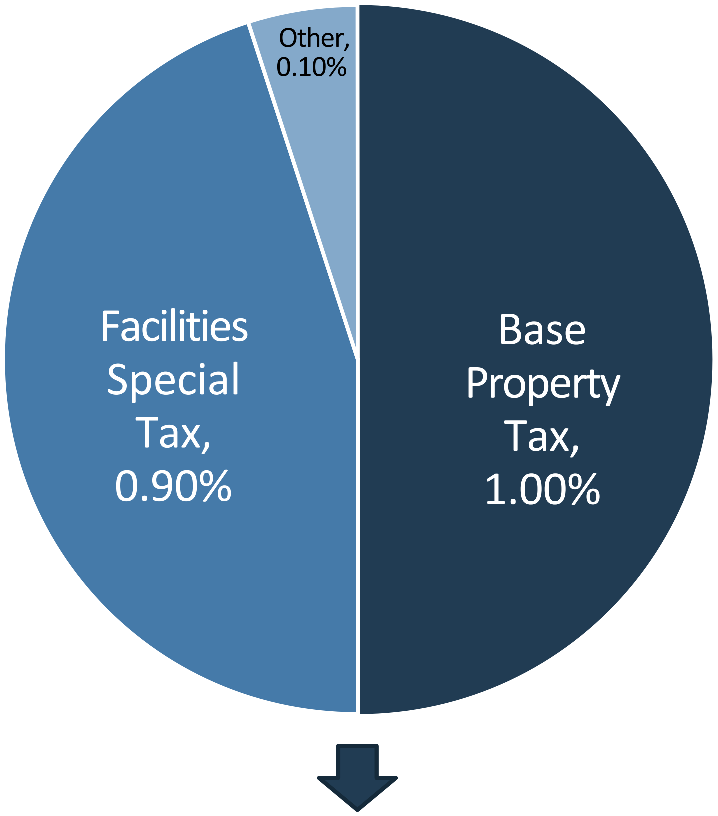
Estimated Home Price	**$ 600,000**	**$ 1,200,000**
Homeowners Exemption	(7,000)	(7,000)
Estimated Assessed Value	$ 593,000	$ 1,193,000
Ad Valorem Property Taxes		
Base 1% Property Tax	$ 5,930	$ 11,930
City GO	120	240
Local School District GO	180	360
Regional Community College District GO	90	180
	$ 6,320	$ 12,710
Direct Charges		
Proposed CFD Facilities Tax	$ 3,000	$ 6,000
Proposed CFD Services Tax	600	1,200
Local School District CFD	500	1,000
Lighting & Landscaping District	90	180
Library Service Tax	50	50
	$ 4,240	$ 8,430
Total Ad Valorem and Direct Charges	$ 10,560	$ 21,140
Overall Tax Burden	**1.76%**	**1.76%**

Allocating Capacity: Services vs. Facilities

200-unit Project
$500,000 Home Price 2%
Total Tax Rate



Annual Services Costs Funded = $200,000
Net Construction Proceeds = $10.5 million



Annual Services Costs Funded = $0
Net Construction Proceeds = $13 million

Bond Capacity Considerations

How much in project funds can a CFD support?

- **CFD Parameters** *Determined at district formation*
  - Maximum bond authorization
  - Eligible projects
  - Maximum annual tax rates and annual escalator (if any)
- **Value of land supporting debt** *Determined at bond issuance*
  - Standard minimum aggregate value to debt ratio of 3-to-1
- **Maximum tax capacity and debt service coverage**
  - Based on maximum annual special tax revenues projected at build-out
  - Minimum coverage typically 110% annual debt service
  - Administrative expenses may be paid before or after debt service
- **Bond market conditions**
  - Lower interest rates = more bond proceeds within same revenues

District Formation: CFD Legislative Approvals

- **Resolution of Intention (ROI)**
  - Council/Board declares its intent to establish district
    - Identifies proposed boundary, tax formula, eligible facilities, maximum bond amount
- **Public hearing**
  - At least 30 days but not more than 60 days later
- **Election**
  - 2/3rds approval required
  - Vote by electorate if 12+ registered voters in the district, otherwise by landowners, weighted by acreage
- **Resolution of Formation (ROF)**
  - Approves final tax formula, boundary map, and eligible facilities, and max bond authorization

Often occur at one Council/Board meeting

Session Four

Current Application of Land-Secured Financing Districts

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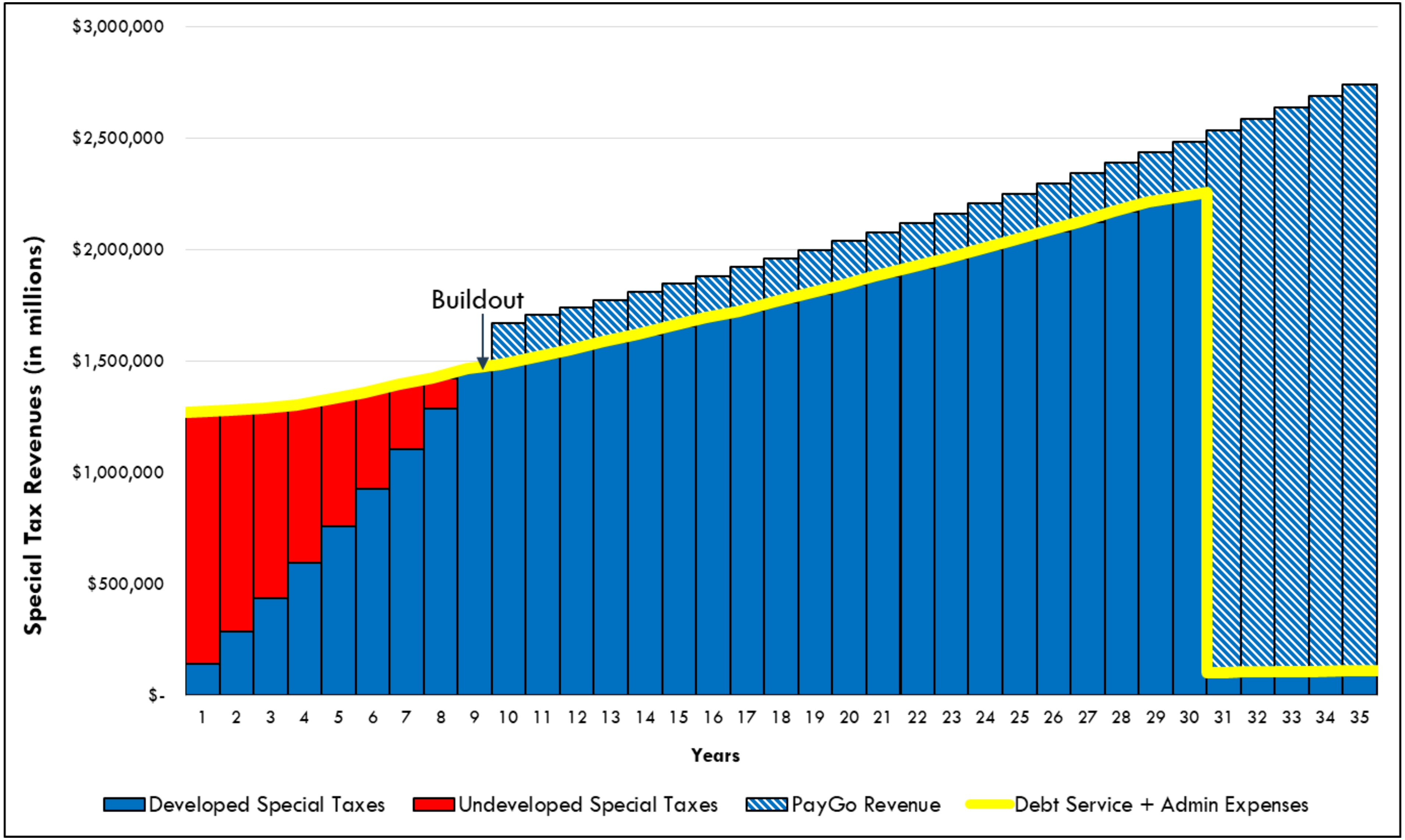
New Trends in Mello-Roos CFDs

- PayGo Revenues
- Extended Term
- Transition of Facilities Tax to Services Tax
- Annexable Services CFDs
- Contingent Special Tax

Pay-As-You-Go Revenues (PayGo)

- PayGo = special tax revenues remaining after payment of debt service and administrative expenses
- Maximum special tax levied on Developed Property, not Undeveloped Property
- Little or no PayGo in initial years of development
- Available from 10% coverage, savings after refundings, and retirement of bonds

PayGo Revenues



Uses of PayGo Revenues

- Continued acquisition of facilities (reimbursement to developer) after bond issuance
- Payment of facility costs in later years of development
- Repair/replacement of facilities funded from bond issues
- Deferred maintenance if services special tax is delayed or not required
- Contribution to major projects for which funding can be delayed (e.g., sea level rise improvements, transit, interchange)

PayGo Policy Considerations

- Term of collection of maximum special tax
- Use of PayGo Revenues
- Beneficiaries of bond refundings
  - Taxpayers = reduction in special taxes levied
  - Developers = additional reimbursements
  - Public agency = funding of facilities and/or maintenance

Extended Term

- Sunset date for special tax is well past retirement of initial bonds
  - Historically, CFDs with multiple bond issues had 35 to 45-year terms
  - Now, 60 to 100-year term of facilities special tax
- Useful only if facilities can be funded well into the future
  - PayGo or additional bond issues
  - After 30 years, use “recycled bonding capacity”
  - Multiple tranches of bonds, each with 30-year term
- Impacts prepayment options

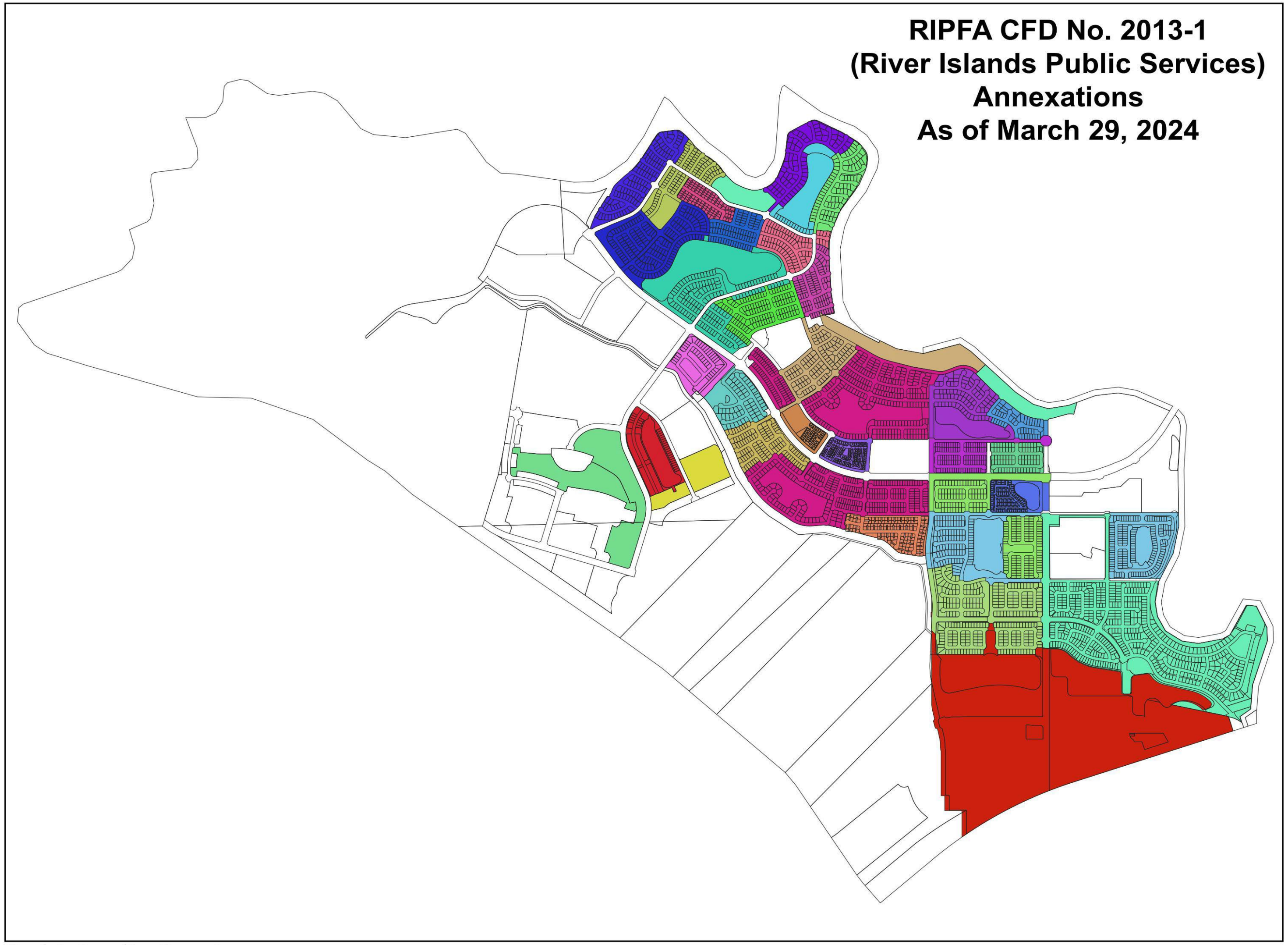
Transition of Facilities Tax to Services Tax

- Reserves capacity in initial years for infrastructure and community facilities
- Provides revenues in perpetuity for maintenance, repair & replacement, and public services
- "Transition Event" usually occurs at the earlier of: (i) all bonds repaid and facilities fully funded or (ii) all bonds repaid and sunset date for facilities tax
- Must transition to avoid 2% cap on escalation and requirement for a sunset date
- Need to consider transition in prepayment formula for facilities special tax

Annexable Services CFDs

- Quick and cost-effective mechanism to comply with condition of development to fund maintenance and/or public services
- One or more parcels in initial CFD boundaries, with projects annexing as condition needs to be met
- Future Annexation Area can be entire jurisdiction and even sphere of influence
- Initial CFD can be “Tax Zone 1” with future tax zones established upon annexation if different tax rates are needed
- Maximum special tax may have multiple components for different cost items
- With each annexation, one or more components can be changed

Annexable Services CFD



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Contingent Special Tax

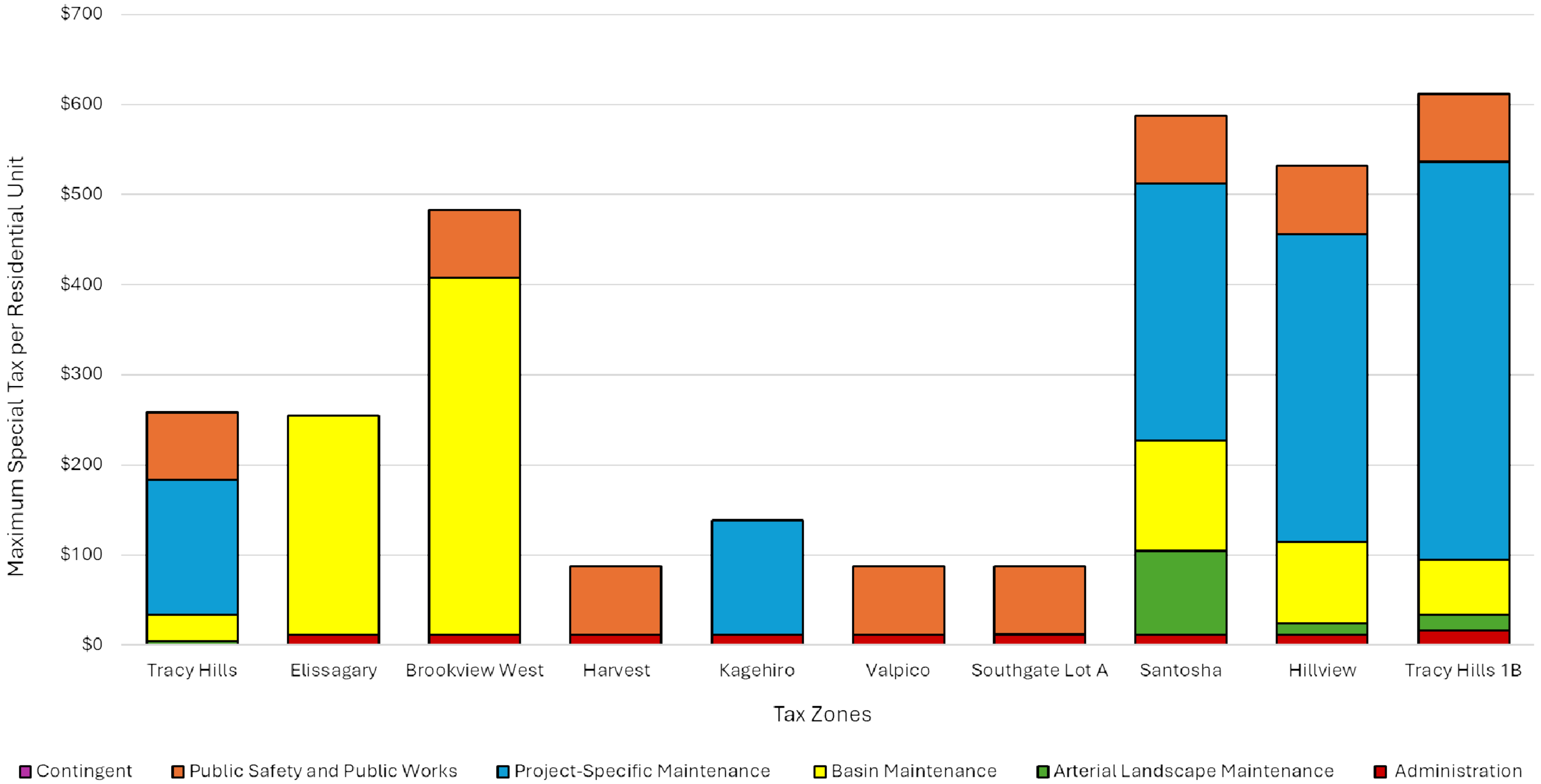
- Used when public agency is concerned about continuation of services being provided by an owners association
- Kicks in if and when association does not provide required service(s) or provides substandard level of service
- “Trigger Event” is defined in RMA
- Contingent Special Tax must be disclosed to homebuyers

Case Studies

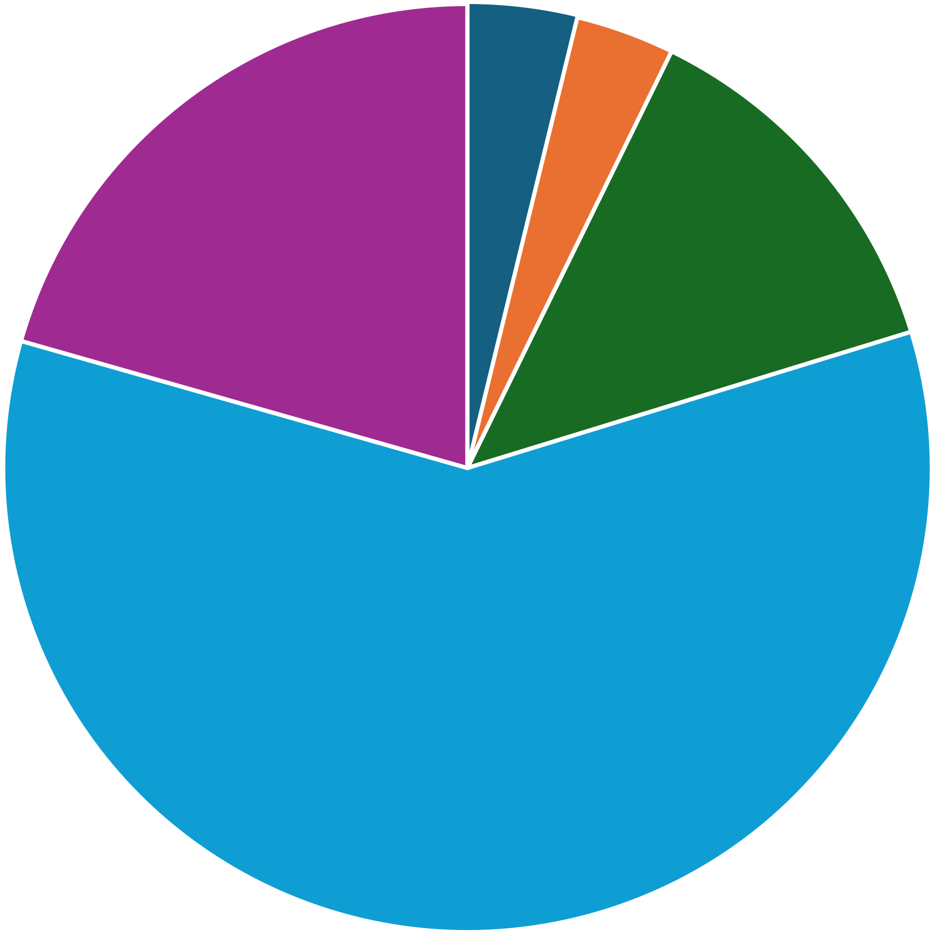
City of Tracy: Citywide Services CFD

- All new developments in Tracy are conditioned to fund maintenance and public services
- Original CFD formed in 2018 with replacement formed in 2021 to add more authorized services
- 14 annexations to date, all creating a new tax zone
- Six different components making up one maximum special tax
- Two components are the same in almost every zone, other four vary by zone
- Escalator = lesser of increase in CPI or 4%
- In fiscal year 2023-24, CFDs generated almost $500K in aggregate special tax revenues.

City of Tracy: Citywide Services CFD



City of Tracy: Citywide Services CFD



Revenues Collected in FY 2023-24

- Administration Component
  $18,799
- Landscape Maintenance
  $17,019
- Basin Maintenance
  $64,270
- Project-Specific Maintenance
  $292,304
- Public Safety and Public Works
  $101,714
- Contingent Component
  $0

Treasure Island: Case Study of a Modern CFD

- Improvement Areas
- Future Annexation Area
- PayGo
- Extended Term
- Adjustment of Maximum Tax prior to First Bond Issue
- Transition of Facilities Special Tax to Services Special Tax

Redevelopment of Treasure Island

Former U.S. Navy station from 1941 to 1997

Yerba Buena Island

- 150 acres natural island
- Anchors Bay Bridge

Treasure Island

- 400 acre man-made island
- Hosted 1939 International Golden Gate Exhibition

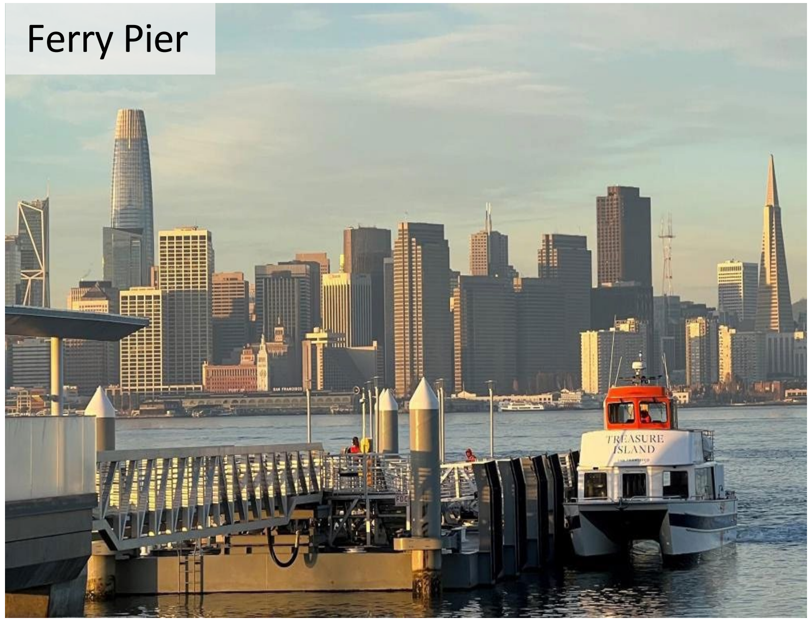
Treasure Island Planned Redevelopment

Expansive Development Plan

- Up to 8,000 homes, 25% below market
- 240,000 sq ft of retail, office, and commercial uses
- Ferry terminal and 400-slip marina
- Parks and open space

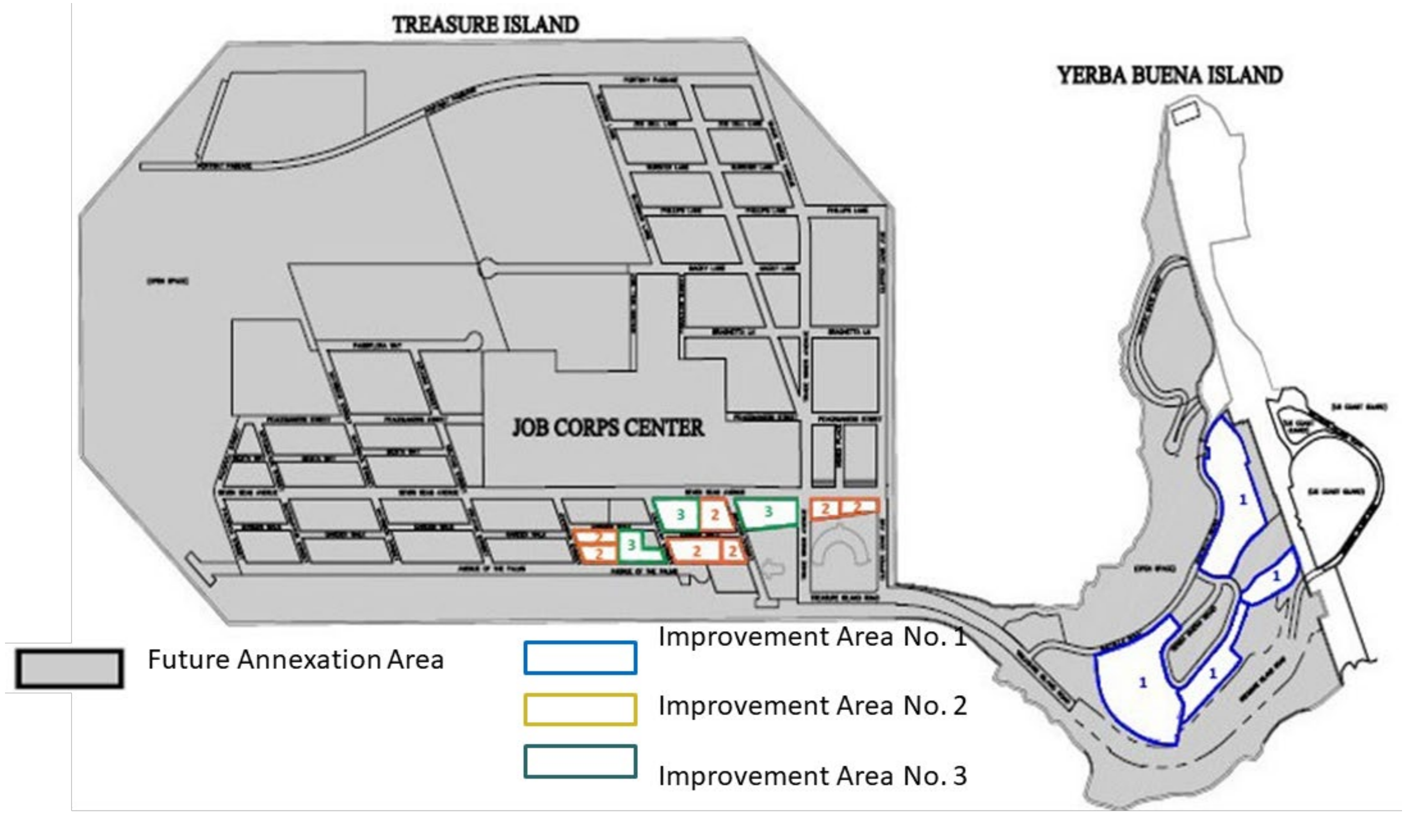
Treasure Island Infrastructure Needs

- **Significant upfront infrastructure costs**
  - Geotechnical stabilization of soils on manmade island and sea level rise mitigations
  - Modern utility systems
  - Rebuilt Causeway connecting the Islands
  - Streets, bikepaths, pedestrian trails
  - New Ferry Terminal
  - Expansive parks and open spaces
  - Over $700 million invested to date
- **Future capital and maintenance needs**
  - Uncertain future Sea Level Rise improvements
  - Ongoing maintenance of parks, infrastructure, and Sea Level Rise improvements



San Francisco CFD No. 2016-1 (Treasure Island)

- Formed in 2017 with $5 billion authorization
- Improvement Area No. 1 (Yerba Buena Island) and a Future Annexation Area
- Additional property has since annexed into Improvement Areas No. 2 and No. 3



Treasure Island: Case Study of a Modern CFD

- **Developer anticipating 8 improvement areas (IAs)**
  - Three IAs formed to date; future IAs established when property annexes into CFD
- **Financing Plan provided for 999-year facilities special tax term**
  - Ultimately set at 100 years for each IA, then transitions to services special tax.
- **Negotiated application of PayGo Revenues:**
  - First 42 years = acquisition of infrastructure from developer
  - Years 43-100 = facilities and improvements determined by City, including Sea Level Rise (SLR) improvements
- **"Transition Event" = earlier of (i) all bonds repaid and SLR capital reserve fully funded, or (ii) all bonds repaid and facilities tax levied for 100 years**
  - Facilities special tax is then reduced to $0
  - Services special tax equal to 26% of facilities special tax prior to transition kicks in

Treasure Island: CFD Bond Sales to Date

Improvement Area No. 1

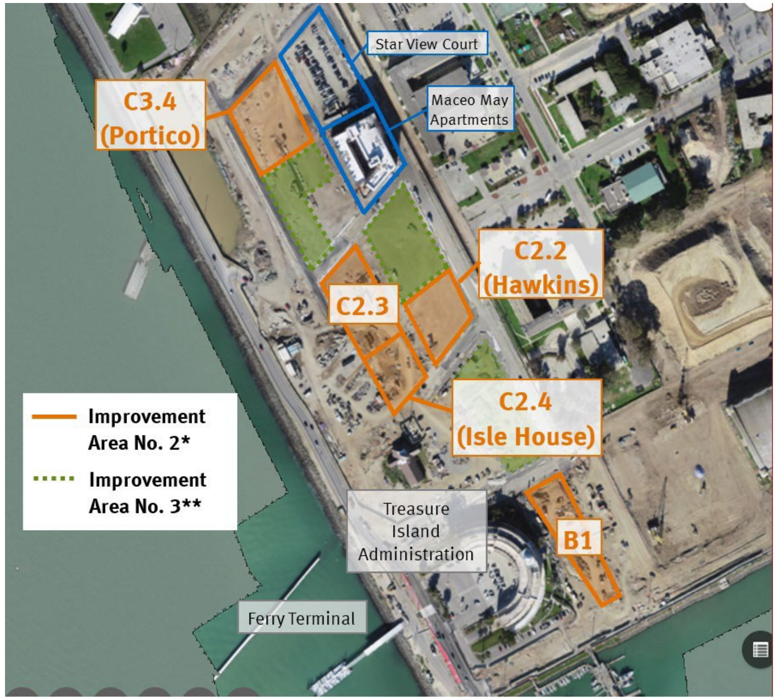
- $17 million inaugural sale in October 2020
- $40 million parity sale in July 2021
- 124 units completed, 31 units nearing completion

Development Status as of October 2020

Improvement Area No. 2

- $25 million sale in January 2022
- $17 million parity sale in December 2023
- 576 units under construction

Aerial as of late 2021



LUNCHEON

SESSION FIVE

District Formation: Integration of Tax Increment and Land-Secured Districts

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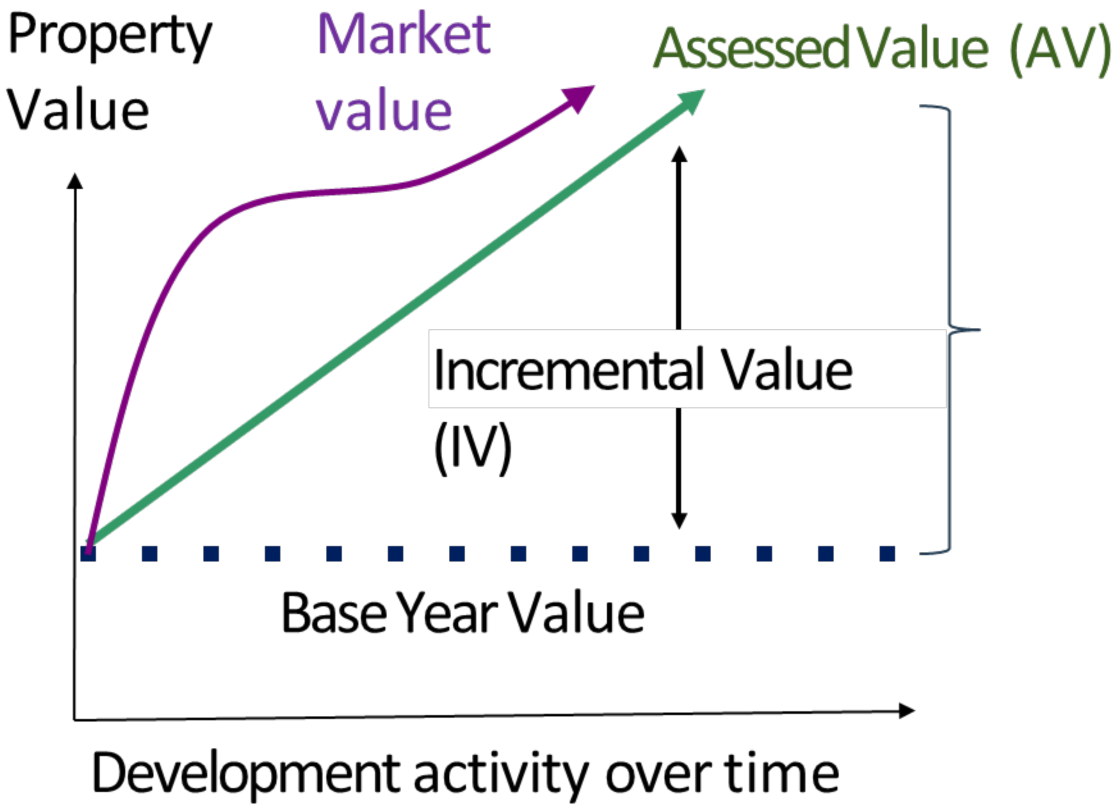
Infrastructure Financing Districts (IFDs)

- **Original statute from the 1990s**
- **Statutory powers expanded and revised following the dissolution of Redevelopment Agencies in 2011**
- **Several variations:**
  - Enhanced Infrastructure Financing District (EIFD)
  - Infrastructure Revitalization Financing District (IRFD)
  - Community Revitalization and Investment Authority (CRIA)
  - Climate Resiliency District (CRD)

Infrast.ructure Financing Districts (IFDs)

- **Participating entities can direct all or a portion of their share of incremental property taxes within a district**



Gross Tax Increment
=1% property taxes on incremental assessed value

Potential IFD Revenues
= *some or all* of the ***participating entities' share*** of 1% property tax revenues; schools explicitly excluded

Other revenues may also be pledged (i.e. VLF fees, RPTTF residuals)

Considerations for using IFDs

- **No new tax/no new revenue**
  - Just reallocating revenues from general fund to IFD
- **Limited revenue stream**
  - Primarily share of 1% property tax revenues of city, county or special district that opts in
  - Need not be all of participating entities' share
- **Can create a bondable revenue stream for housing**
  - Many issuers split tax increment between housing and facilities

Use of IFD Proceeds

- **Useful life of at least 15 years**
- **Public facilities or projects with community-wide significance**
  - Water, sewer, roads, fire stations, libraries, etc.
- **Affordable housing**
  - Acquisition, construction or rehabilitation of housing serving very low, low or moderate income people
  - Preservation covenant: 45+ years for ownership, 55+ years for rental

IFD Formation Overview

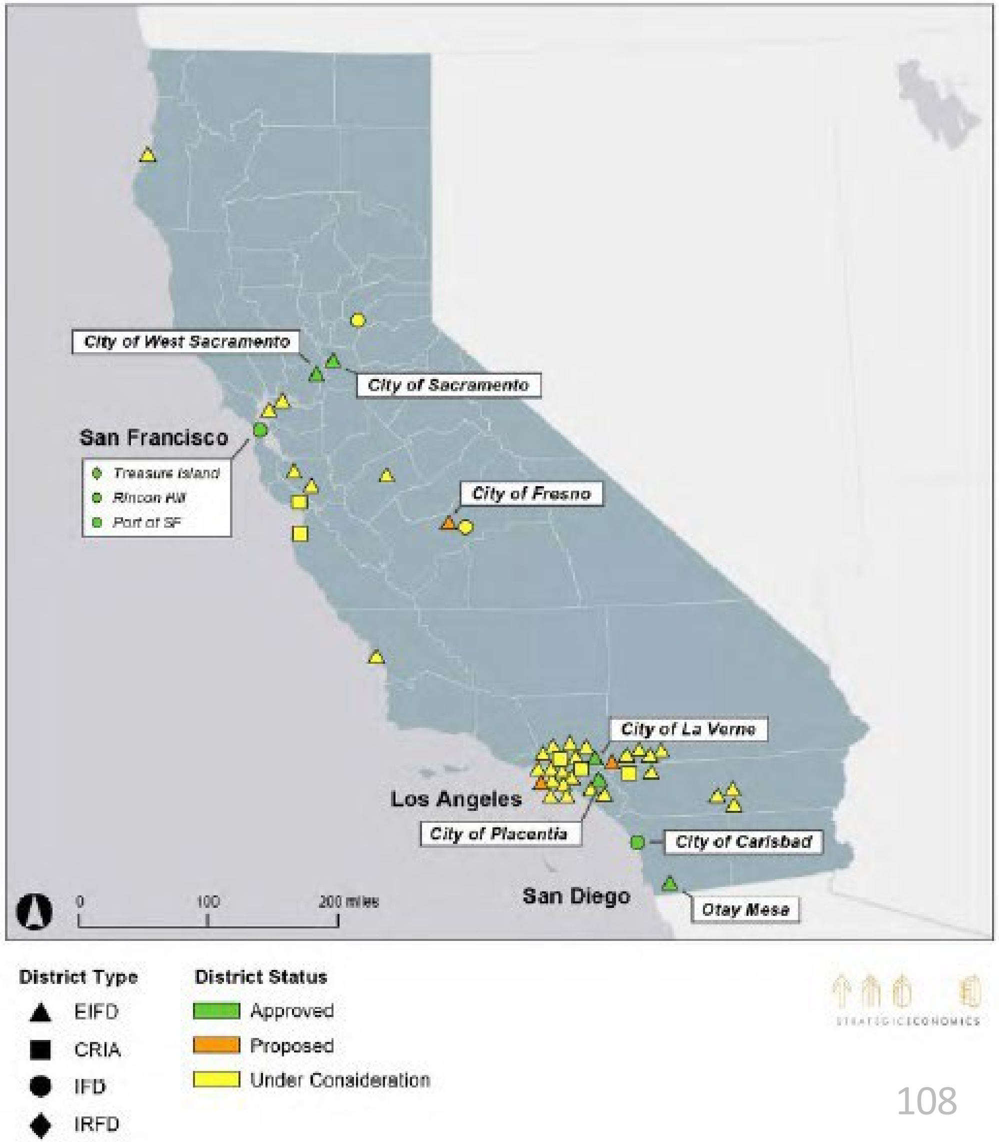
- **Resolution of Intention**
  - Sponsoring agency initiates formation and forms a Public Financing Authority
  - Notices sent to District landowners and other taxing entities
- **Public Financing Authority (PFA)**
  - Governed by members of participating agencies, 2 members of the public
- **Infrastructure Financing Plan (IFP)**
  - Includes boundary map, facilities list, pledged revenues, revenue projections and cap, tax increment limit, sunset date
- **Three public hearings**
  - At least 30 days apart, with opportunity for protest
  - Process terminates upon majority (50+% protest), election required for 25-50% protest
- **Adoption of the IFP**
- ***Judicial validation***

The Infrastructure Financing Plan (IFP)

- **Boundary map**
  - May include distinct Project Areas
- **Facilities list and project goals**
  - Estimated location, timing and costs of EIFD facilities, community-wide significance of facilities
- **Pledged revenues and revenue projections**
  - Annual tax revenue projections and portion of participating taxing entities share of tax increment committed annually, can vary by taxing entity and over time
  - Plan of finance including intention to incur debt
  - Cap on total revenues allocated to the district
- **Tax collection period and sunset date**
  - Not more than 45 years from approval of bond or loan OR 45 years after each Project Area has received $100,000 in annual increment
- **Fiscal impacts of expected development**

Snapshot of IFD Activity Around California

- **May IFDs created to date**
  - Sacramento (City), Sacramento (County), West Sacramento, Napa
  - Placentia, Otay Mesa, LaVerne, Rancho Cucamonga
  - Rincon Hill (IFD), Treasure Island (IRFD), Mission Rock and Pier 70 (SF Port’s own IFD statute)
  - Others formed or under consideration
- **First IFD public bond sale in 2022**
  - $29 million for San Francisco’s Treasure Island IRFD in August 2022



Source: Housing Financing Tools and Equitable, Location-Efficient Development in California Report on the Use of Tax Increment Financing Prepared in Accordance with California Senate Bill 961, 2017-2018 Regular Session; County of Sacramento

Case Study: Treasure Island IRFD No. 1

- **Formed in 2017 and judicially validated in 2018**
  - Planned for 1,755 residential units and two hotels on 33 acres
  - Base year established (at $0) before land was privately owned and assessed

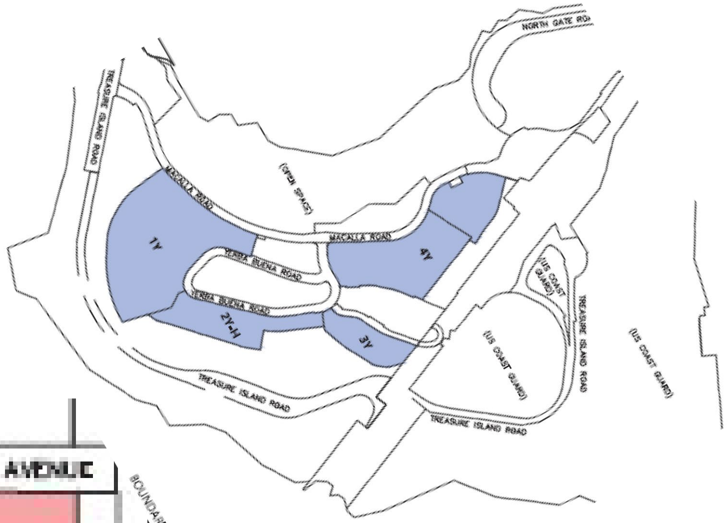
BOUNDARIES OF INFRASTRUCTURE AND REVITALIZATION FINANCING DISTRICT NO. 1

- BOUNDARIES OF PROJECT AREA A
- BOUNDARIES OF PROJECT AREA B
- BOUNDARIES OF PROJECT AREA C
- BOUNDARIES OF PROJECT AREA D
- BOUNDARIES OF PROJECT AREA E

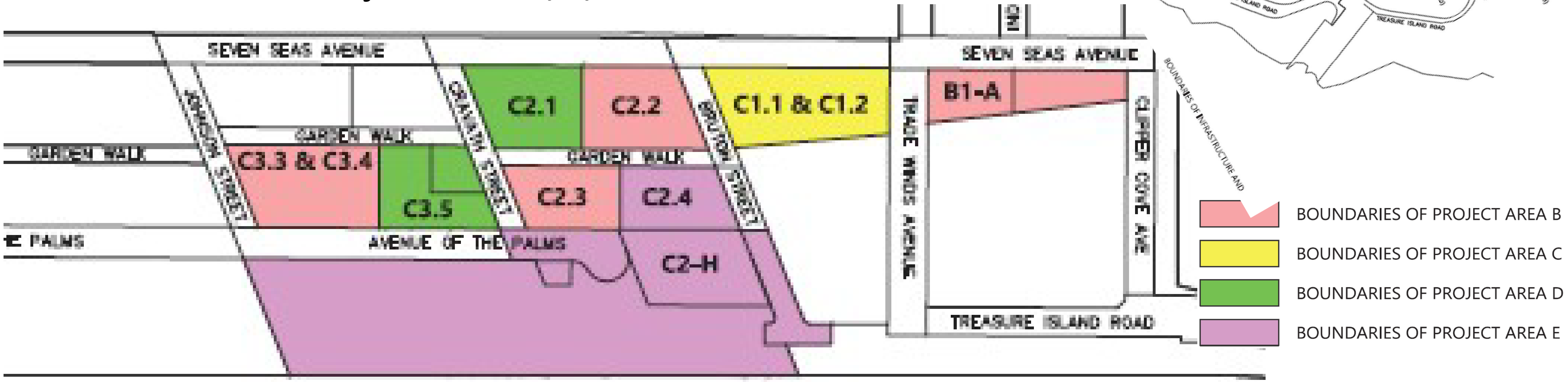
Treasure Island IRFD: Project Areas

- **Five initial Project Areas (non-contiguous)**
  - Sized to encompass planned development phases
- **Revenue collection time limits vary for each**
- **Revenues are pooled into one credit**

Project Area A boundaries



Project Areas B, C, D and E Boundaries



Treasure Island IRFD: Allocated Revenues

- **San Francisco receives 65% of 1% property tax rate**
  - A portion (56.6%) pledged directly to IRFD
  - Contingent portion (8%) enhances debt service coverage; returned to City's general fund if unused
- **IRFD Revenues are further split**
  - 82.5% for public facilities; 17.5% for affordable housing

Share of 1% Property Tax Rate	
City Share	**64.6%**
ERAF	25.3%
SFUSD	7.7%
SF CCD	1.4%
SF Office of Education	0.1%
BART	0.6%
BAAQMD	0.2%
Total	**100%**

	Total	Housing Share (17.5%)	Facilities Share (82.5%)
Pledged to IRFD	56.6%	9.9%	46.7%
Conditional City Funds	8.0%	1.40%	6.6%
	64.6%	**11.3%**	**53.3%**

Portion of City's share of 1% property tax rates and splits for facilities and housing were heavily negotiated in context of developer obligations

Treasure Island IRFD: Tax Increment Collection

- **Tax increment collection <u>in each Project Area</u> begins when minimum revenue threshold is met and continues for 40 years thereafter**

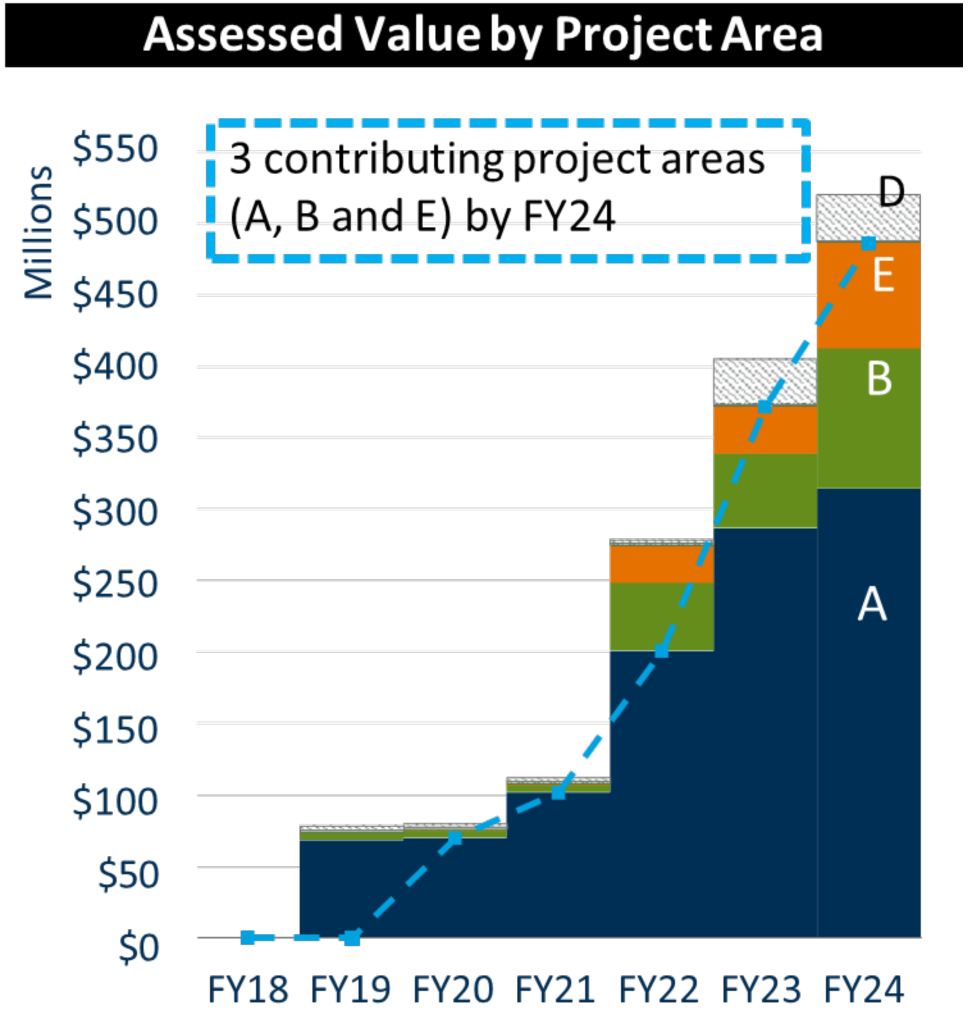
IRFD No. 1 Initial Project Areas				
Project Area	**Acreage**	**Trigger Amount**	**Commencement Year**	**Last year of Tax Increment**
A	15.6	$150,000	FY2019-20	FY2058-59
B	4.4	150,000	FY2022-23	FY2061-62
C	1.6	300,000	TBD	TBD
D	2.1	300,000	TBD	TBD
E	9.5	150,000	FY2022-23	FY2061-62
	33.1			

<u>EIFD Variations</u>

- Tax increment collection for **45** years
- Collection period start can be either: (1) date of local agency loan to the EIFD, (2) date of EIFD's bond issuance approval, or (3) when at least **$100,000** of tax increment is generated in a designated Project Area

Treasure Island Incremental Value

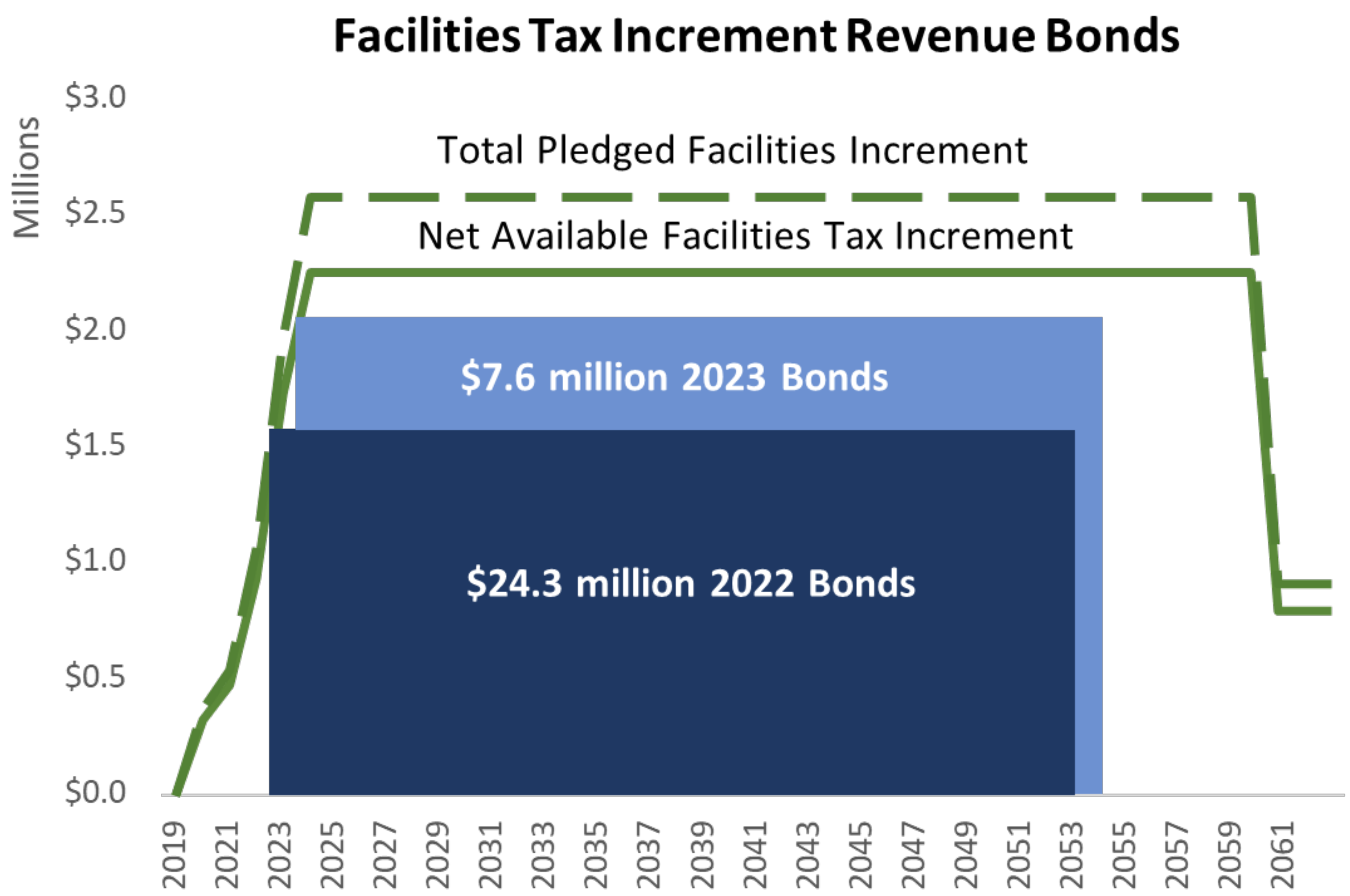
- **By June 2022, the Bristol was complete**
  - 124 residential condominiums (10 below market)
  - Accounted for 41% of FY23 AV, 32% of FY24 AV
- **3 Project Areas contributing tax increment**



Treasure Island Tax Increment Bonds

San Francisco sold its first round of IRFD Tax Increment Bonds in August 2022

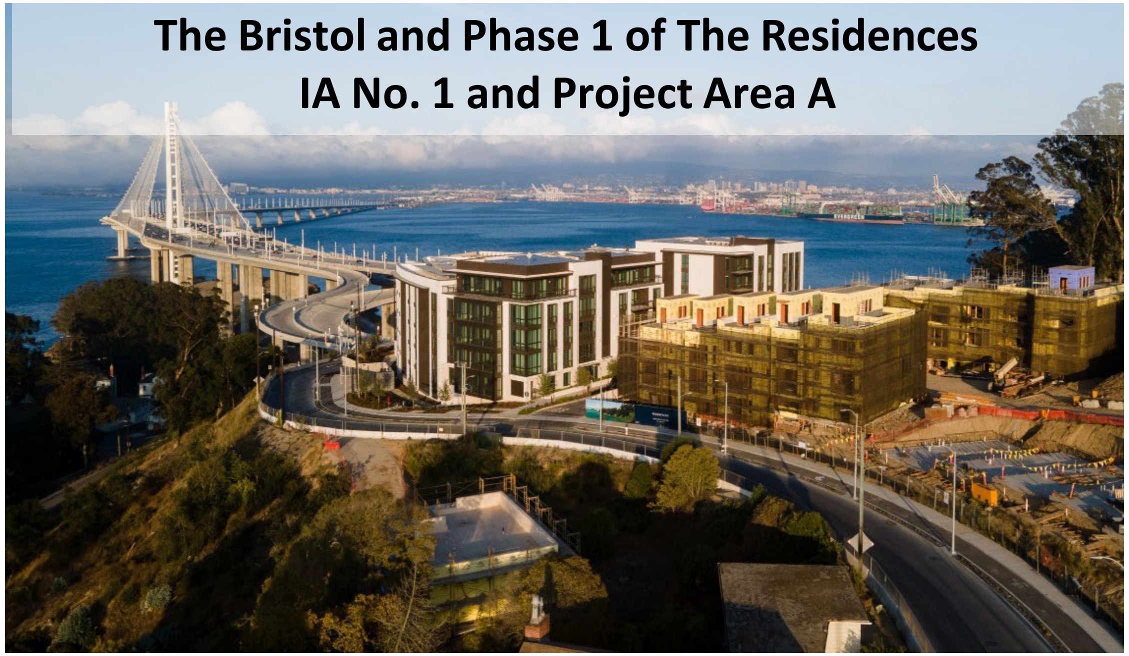
Parity Bonds were sold in December 2023



- Distinct securities for Facilities and Housing Bonds
- Total IRFD Bonds: $38.6 million
    - $31.9 million Facilities Bonds
    - $6.7 million Housing Bonds
- 125% All-In Coverage for each
- Revenues drop off as each Project Area term sunsets

Staggered CFD and IRFD Bond Sales

- **Special Tax Bonds sales**
  - $99 million issued to date with sales in 2020, 2021, 2022 and 2023
- **Tax Increment Bonds sales:**
  - $39 million issued to date with sales in 2022 and 2023



The Bristol and Phase 1 of The Residences
IA No. 1 and Project Area A

Photo from Sept 2022 by Andrew Campbell Nelson

Three Active Projects in IA No. 2, Project Areas B and E

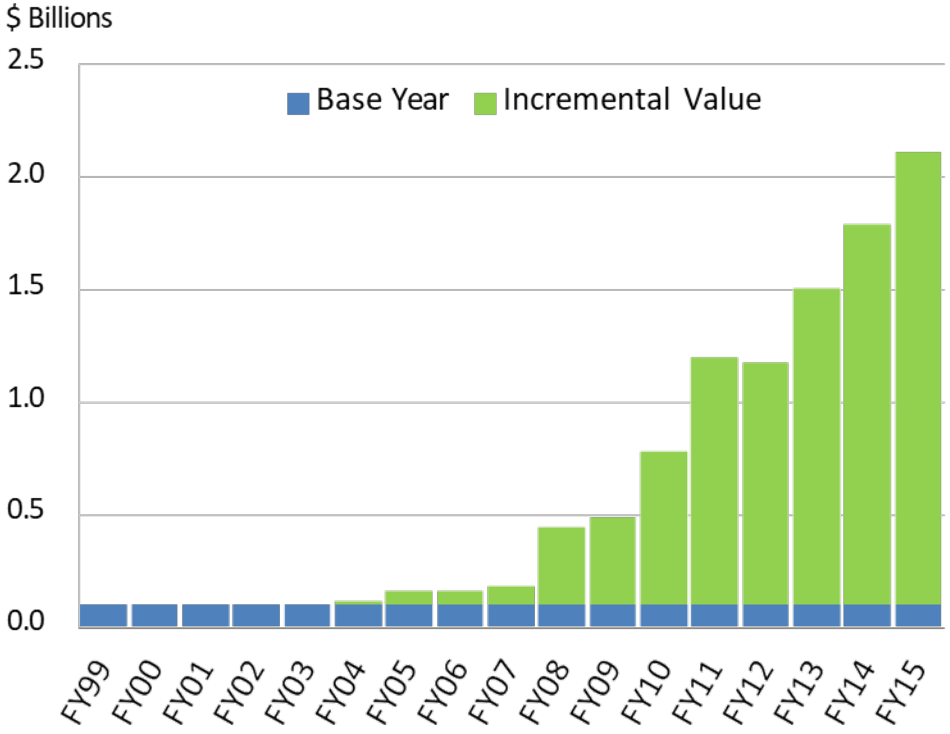
Photo as of November 7, 2023.

IFD Bond Financing Challenge: Timing Lag

- **Development may take years to generate "bondable" revenues**
  - No revenue to leverage until after development is recognized on assessed tax rolls; may be 12-24+ month lag

Historic View of San Francisco Mission Bay South

Mission Bay South Assessed Values



IFD Bond Financing Challenge: Passive Revenue

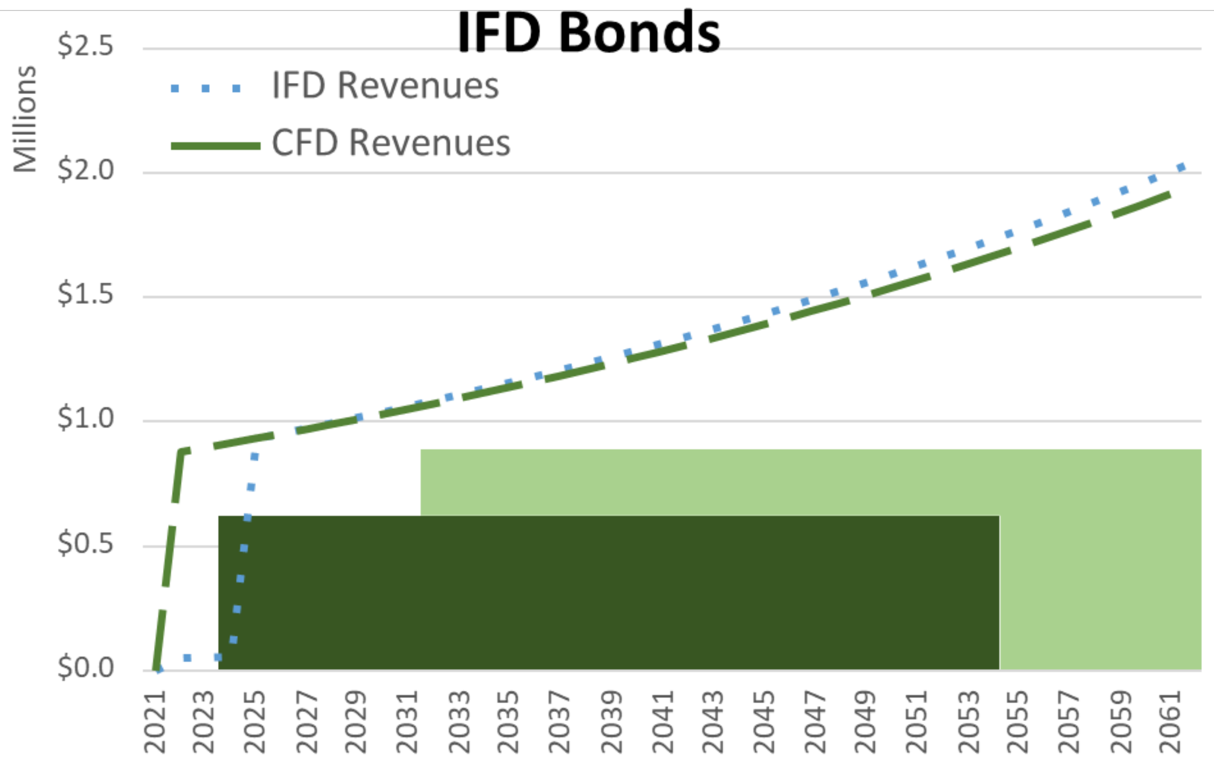
- **IFD revenues decline when assessed values decline**
  - Natural disasters, assessment appeals, non-profit purchase
- **Debt service coverage is used to insulate against declines**
  - 125% was “standard” for old redevelopment project area credits
- **Higher bond debt service coverage may be required for IFDs**
  - Smaller geographic areas
  - Concentrated tax base – by land use or major taxpayers
  - Volatility of revenue fluctuation
- **Higher coverage reduces net project funds**

Pairing IFD with a CFD to Mitigate Challenges

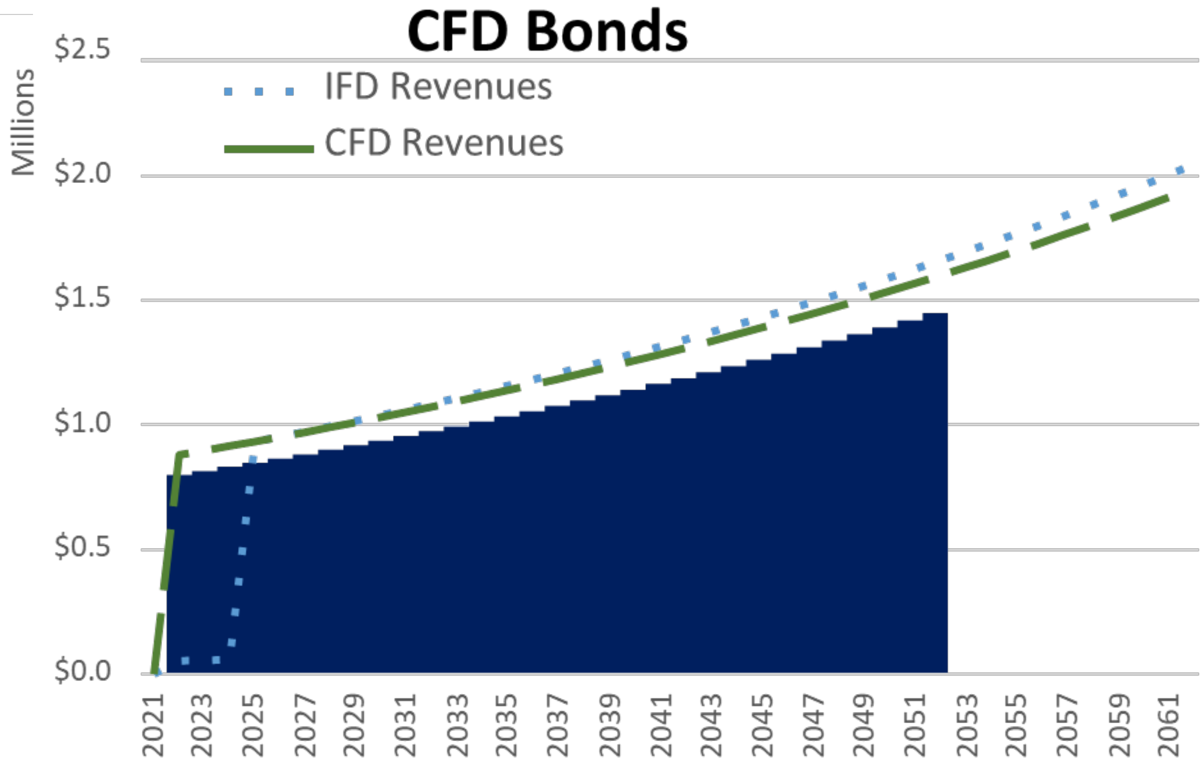
- **Special tax is an active tax with more predictable revenues**
  - Not dependent on assessed values or development activity
  - Special tax can be levied if tax increment collections are insufficient
- **Shifts payment risk from issuer to property owner**
  - Delinquent special taxes are subject to accelerated foreclosure
- **CFD enhances bonding capacity and can accelerate bond issuance**
  - Lower debt service coverage (typically 110%)
  - Lower interest rates
  - Investors look to value of land as collateral for bonds

IFD Bonds vs CFD Bonds

Same revenues leveraged through Tax Increment Bonds vs Special Tax Bonds



- Leverage only *current* revenues, level debt
- Coverage at least 125% - 150%
- Higher expected interest rates



- Leverage escalating revenues, escalating debt
- Coverage of 110%
- Lower expected interest rates

Alternative CFD/IFD Combinations

- **Stacked CFD and IFD to maximize funding sources**
  - Bond issuances may be staggered in time
  - i.e. Treasure Island CFD and IRFD
- **Netting IFD revenues against overlapping CFD**
  - Tax increment, as and when available, can reduce special tax levy
  - i.e. Sacramento Aggie Square, San Francisco Mission Rock
- **Flexible application of IFD revenues, to CFD or not**
  - i.e. Sacramento County Metro Air Park EIFD

CFD with IFD Offset: Sacramento Aggie Square

- **Planned life sciences campus**
  - Located on UC Davis Sacramento campus
- **EIFD to fund public infrastructure**
  - Formed on 42 acres, 19 parcels, 5 owners
  - 100% of tax increment plus payment in lieu of taxes and RPTTF revenues
  - 80% for developer-led costs, 20% for affordable housing
- **Intertwined CFD**
  - Maximum special tax set at 80% of expected tax increment
  - Special tax levy will be reduced by tax increment collected in prior fiscal year
- **Special tax bonds expected**

Aggie Square, City of Sacramento

Flexible CFD and IFD: Sacramento Metro Air Park

- **Industrial business park**
  - 1,600 acres along Interstate 5, next to Sacramento International Airport
- **CFD formed in 2000**
  - Privately placed bonds in 2004 and 2007 raised $103 million
- **EIFD formed in spring 2022**
  - Additional funding for infrastructure
- **CFD bond sale in summer 2022**
  - $121 million par
  - Option, but not obligation, to use EIFD tax increment to reduce special tax levy in the future

SESSION SIX

Bond Issuance Strategies in Current Market Conditions

Eileen Gallagher, Managing Director, Stifel, Nicolaus & Company

James V. Fabian, Principal, Fieldman, Rolapp & Associates, Inc.

Bond Issuance Process

May immediately follow formation or occur much later

- **Timing considerations**
  - Development momentum
  - Credit quality
  - Bond market conditions
  - Bond-funded project reimbursement readiness
  - Proceeds used to acquire <u>completed</u> infrastructure

- **Federal tax law constraints**
  - "Reasonable expectations" of spending proceeds within 3 years

Bond Capacity Considerations

How much in project funds can a CFD support?

- **CFD Parameters**

  Determined at district formation

  – Maximum bond authorization
  – Eligible projects
  – Maximum annual tax rates and annual escalator (if any)

- **Value of land supporting debt**

  Determined at bond issuance

  – Standard minimum aggregate value to debt ratio of 3-to-1

- **Maximum tax capacity and debt service coverage**
  – Based on maximum annual special tax revenues projected at build-out
  – Minimum coverage typically 110% annual debt service
  – Administrative expenses may be paid before or after debt service

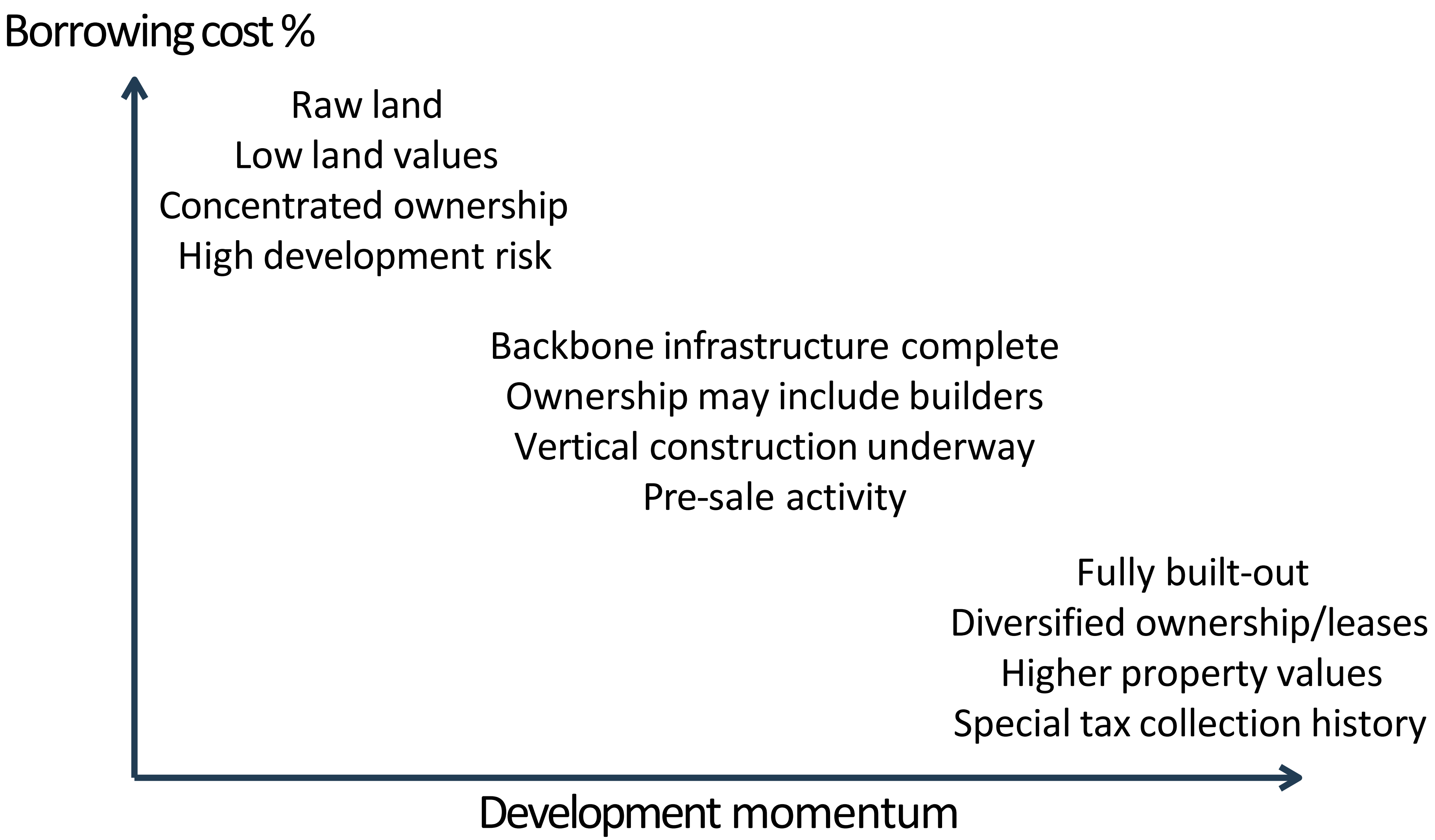
- **Bond market conditions**
  – Lower interest rates = more bond proceeds within same revenues
  – Interest rates are driven by broad economic factors and specific credit quality

Key Credit Considerations

Most early stage land-secured bonds are sold as non-rated securities

Issuer:	Reputation and experience
Local Economy:	Employment options, real estate cycle, sales activity
Property:	Location, attractiveness, environmental condition or hazard
Developer(s) Strength:	Experience, financial resources, equity invested, loans
Development Plan:	Entitlements, development schedule, approvals, absorption schedule, product mix
Development Status:	Status of backbone infrastructure, “in tract” infrastructure, property ownership (developer, builder(s), land bank, homeowners), vertical construction, sales or leasing activity
Product Demand:	Demographics of competing projects
Special Tax:	Burden on property, debt service coverage
Property Values:	Value-to-lien
Legal Structure:	Foreclosure provisions, reserve, type of debt

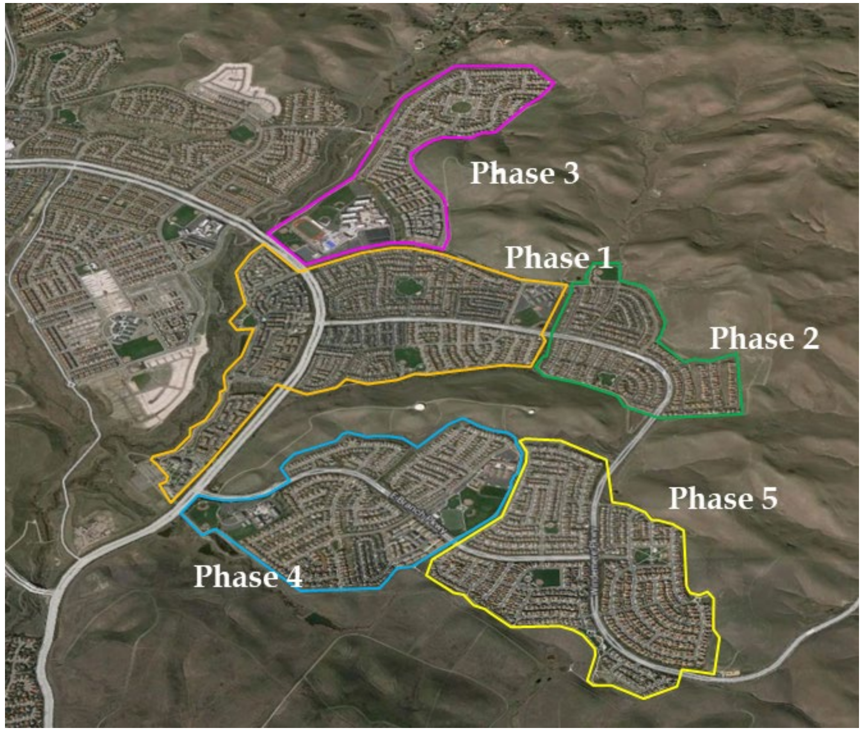
Borrowing Cost and Development Status



Evolution of a CFD: Size, Scale and Land Use

Traditional CFD: Windemere

- Suburban subdivision
- 3,280 single-family homes and 597 condos
- Phased bond sales, *development* risk diminished over time as homes built and sold



Modern CFD: Brooklyn Basin

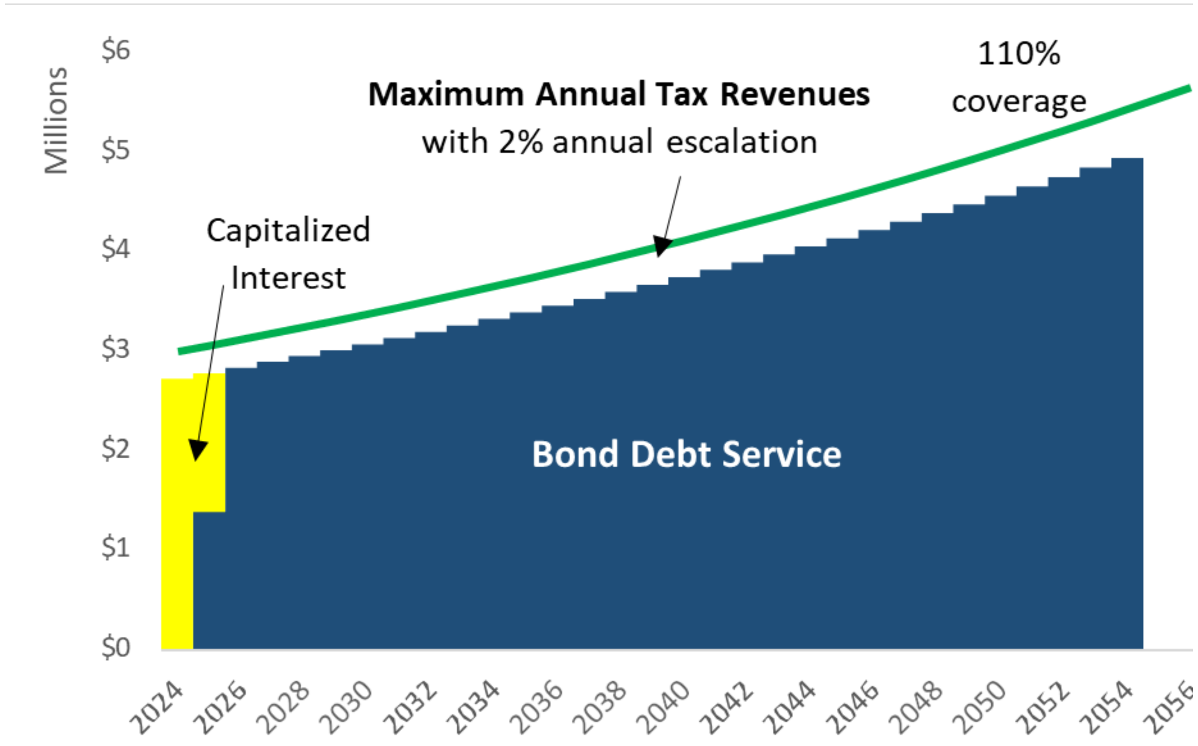
- Urban in-fill
- 3,700 residential units in four phases
- Bonds secured by special tax levy on *completed* buildings
- No development risk but *concentration* risk

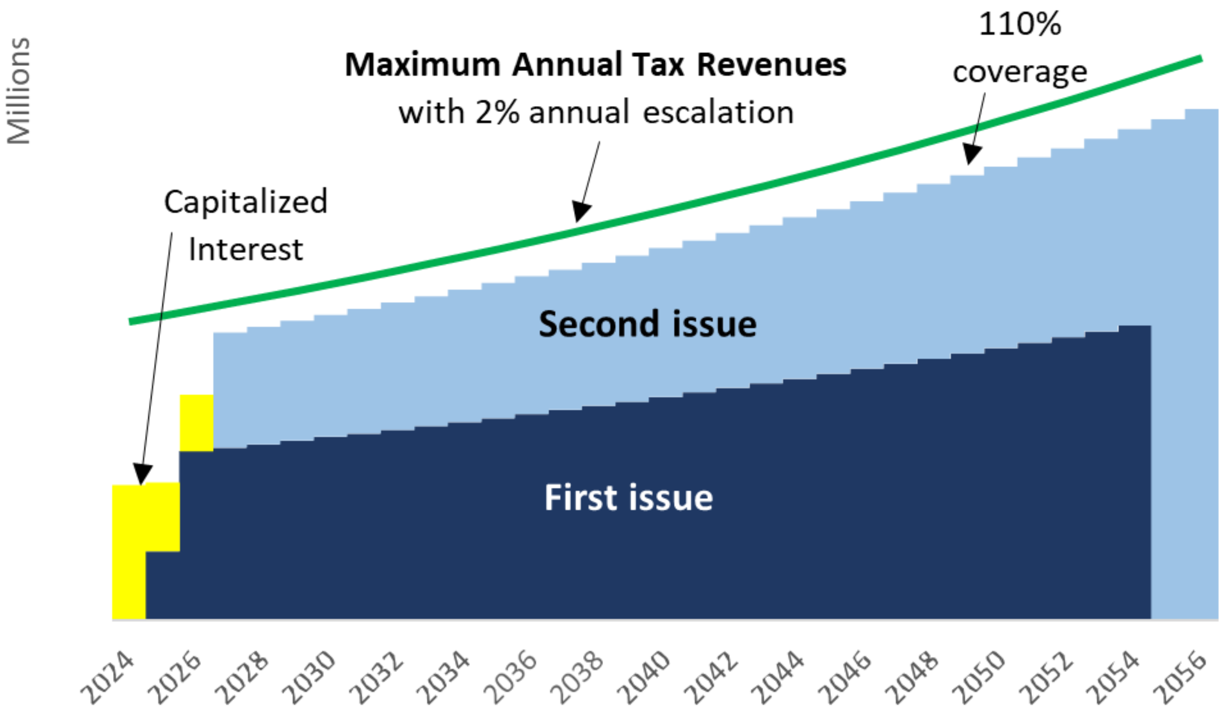
Determining Property Values

- **Issuer promises to pursue accelerated foreclosure if taxes aren't paid**
  - Value of property at a foreclosure sale is key to "land secured" credit quality
- **Assessed value (AV) sometimes used**
  - Completed projects or modest debt
- **Appraisal often used to determine property value**
  - CDIAC Appraisal standards
  - "Bulk sale" value of property recognizing the bond-funded improvements
  - Comparable sales usually used to establish retail price of end product, discount rate, absorption affect value
  - An absorption report can inform expected timing of build out and sales
- **A "composite value" uses AV and appraised values**

Phased Bond Issuance

- **Bond sales may be phased over time**
  - Based on credit quality and/or readiness for proceeds
  - “Additional bonds test” limits extent of future dilution for parity bonds

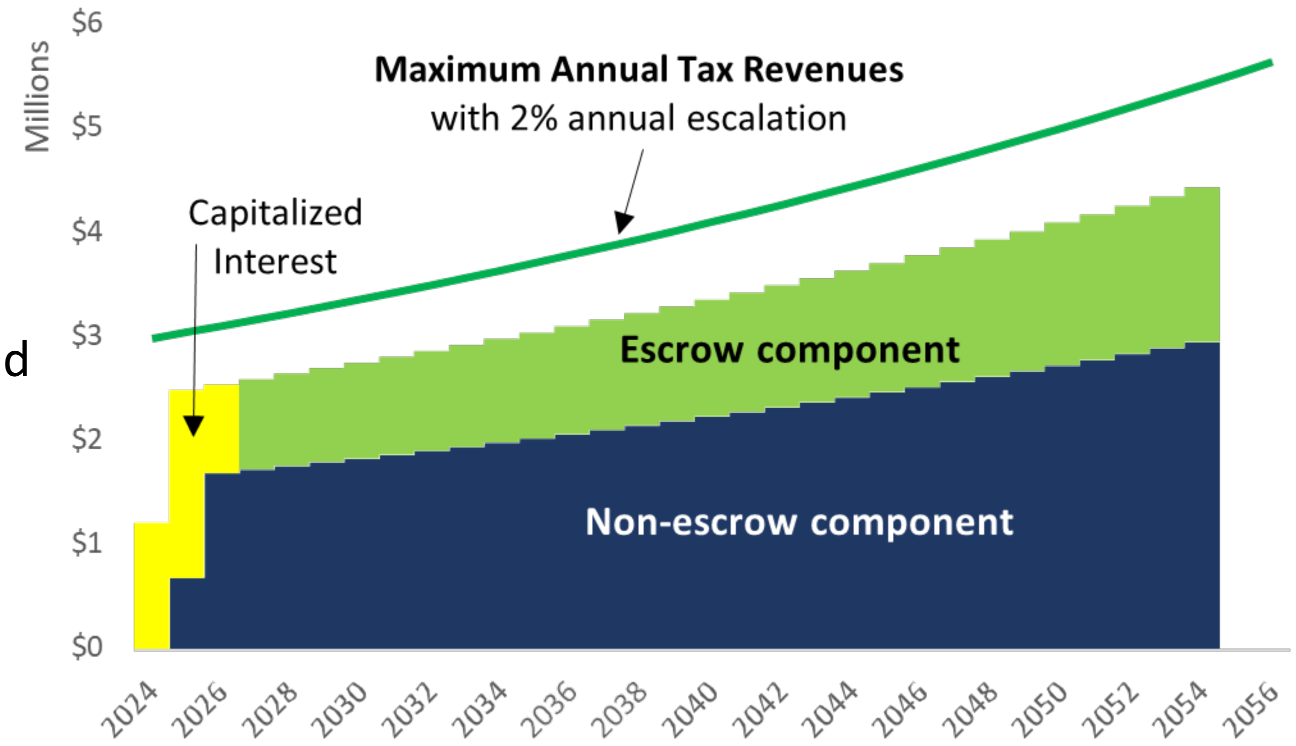




Bolstering Credit Quality - Escrow Bonds

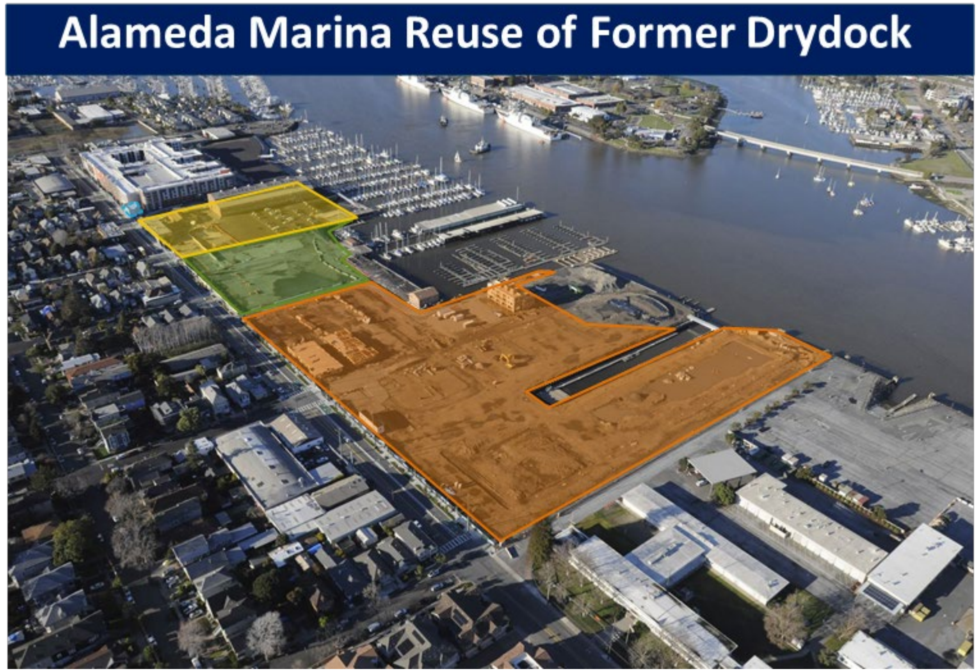
- **Bond proceeds held "in escrow" until release conditions met**
  - Proceeds invested to pay interest on escrowed bonds until release date
  - Can mitigate credit risks while avoiding time and effort of another bond sale

- **Escrow release conditions**
  - Development milestone or other measurable metric
    - i.e. # of building permits pulled
  - "Reasonable expectations" to spend funds within 3 years
  - If condition isn't timely met, escrowed proceeds pay off escrow bonds



"Green Bonds" and Other Labels

- **Heightened investor interest in "ESG"**
  - Risks and benefits related to environmental, social and governance factors
- **Bond designations highlight uses**
  - i.e. "Green Bonds" or "Social Bonds" for renewable energy, climate change adaptation, affordable housing projects
- **Varying standards for designation**
  - Third-party certification, self-designation, investor assessment
  - Disclosure and regulatory considerations
- **Limited pricing benefit – *so far***

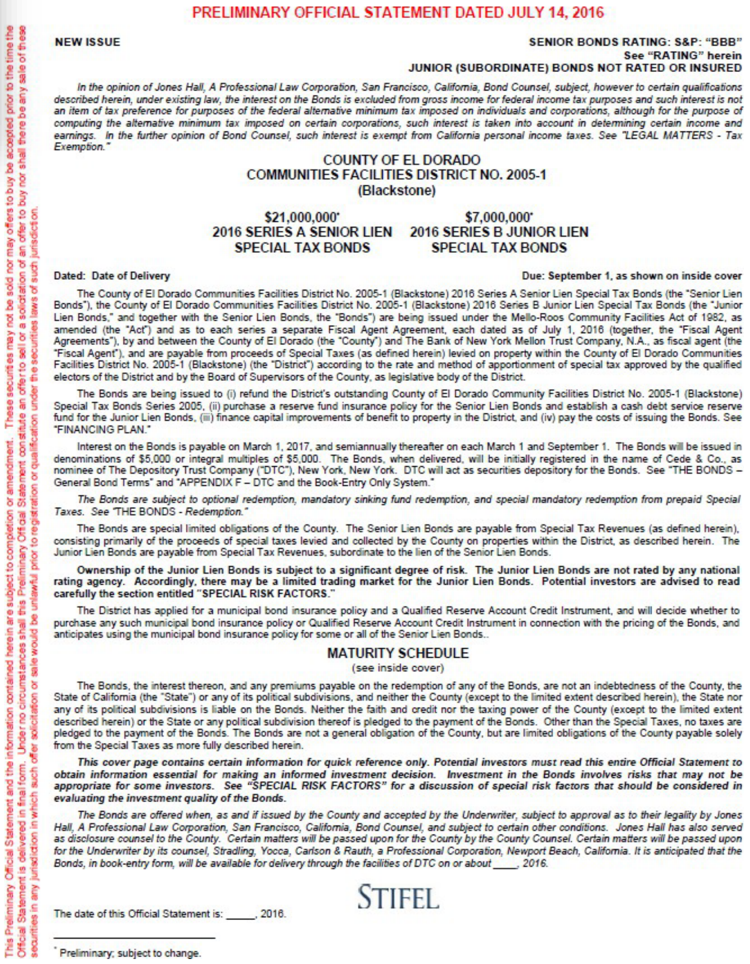


Alameda Marina CFD

- Proceeds used for sea wall construction, protect against sea level rise of up to 7 feet
- $17.5 million 2023 Special Tax Bonds sold as self-designated "Green Bonds"

Preparing a Land Secured Bond For Sale

- **Due diligence process**
  - Issuer and developer
- **Preliminary Official Statement**
  - Primary marketing document distributed to potential investors
  - May include appraisal, tax formula, and/or tax increment estimates
- **Supplemental marketing tools**
  - Investor site tours, drone videos, "virtual" roadshow



PRELIMINARY OFFICIAL STATEMENT DATED JULY 14, 2016

This Preliminary Official Statement and the information contained herein are subject to completion or amendment. These securities may not be sold nor may offers to buy be accepted prior to the time the Official Statement is delivered in final form. Under no circumstances shall this Preliminary Official Statement constitute an offer to sell or a solicitation of an offer to buy nor shall there be any sale of these securities in any jurisdiction in which such offer solicitation or sale would be unlawful prior to registration or qualification under the securities laws of such jurisdiction.

NEW ISSUE

SENIOR BONDS RATING: S&P: "BBB"
See "RATING" herein
JUNIOR (SUBORDINATE) BONDS NOT RATED OR INSURED

In the opinion of Jones Hall, A Professional Law Corporation, San Francisco, California, Bond Counsel, subject, however to certain qualifications described herein, under existing law, the interest on the Bonds is excluded from gross income for federal income tax purposes and such interest is not an item of tax preference for purposes of the federal alternative minimum tax imposed on individuals and corporations, although for the purpose of computing the alternative minimum tax imposed on certain corporations, such interest is taken into account in determining certain income and earnings. In the further opinion of Bond Counsel, such interest is exempt from California personal income taxes. See "LEGAL MATTERS - Tax Exemption."

COUNTY OF EL DORADO
COMMUNITIES FACILITIES DISTRICT NO. 2005-1
(Blackstone)

\$21,000,000*	**\$7,000,000***
2016 SERIES A SENIOR LIEN SPECIAL TAX BONDS	**2016 SERIES B JUNIOR LIEN SPECIAL TAX BONDS**

Dated: Date of Delivery **Due: September 1, as shown on inside cover**

The County of El Dorado Communities Facilities District No. 2005-1 (Blackstone) 2016 Series A Senior Lien Special Tax Bonds (the "Senior Lien Bonds"), the County of El Dorado Communities Facilities District No. 2005-1 (Blackstone) 2016 Series B Junior Lien Special Tax Bonds (the "Junior Lien Bonds," and together with the Senior Lien Bonds, the "Bonds") are being issued under the Mello-Roos Community Facilities Act of 1982, as amended (the "Act") and as to each series a separate Fiscal Agent Agreement, each dated as of July 1, 2016 (together, the "Fiscal Agent Agreements"), by and between the County of El Dorado (the "County") and The Bank of New York Mellon Trust Company, N.A., as fiscal agent (the "Fiscal Agent"), and are payable from proceeds of Special Taxes (as defined herein) levied on property within the County of El Dorado Communities Facilities District No. 2005-1 (Blackstone) (the "District") according to the rate and method of apportionment of special tax approved by the qualified electors of the District and by the Board of Supervisors of the County, as legislative body of the District.

The Bonds are being issued to (i) refund the District's outstanding County of El Dorado Community Facilities District No. 2005-1 (Blackstone) Special Tax Bonds Series 2005, (ii) purchase a reserve fund insurance policy for the Senior Lien Bonds and establish a cash debt service reserve fund for the Junior Lien Bonds, (iii) finance capital improvements of benefit to property in the District, and (iv) pay the costs of issuing the Bonds. See "FINANCING PLAN."

Interest on the Bonds is payable on March 1, 2017, and semiannually thereafter on each March 1 and September 1. The Bonds will be issued in denominations of \$5,000 or integral multiples of \$5,000. The Bonds, when delivered, will be initially registered in the name of Cede & Co., as nominee of The Depository Trust Company ("DTC"), New York, New York. DTC will act as securities depository for the Bonds. See "THE BONDS – General Bond Terms" and "APPENDIX F – DTC and the Book-Entry Only System."

The Bonds are subject to optional redemption, mandatory sinking fund redemption, and special mandatory redemption from prepaid Special Taxes. See "THE BONDS - Redemption."

The Bonds are special limited obligations of the County. The Senior Lien Bonds are payable from Special Tax Revenues (as defined herein), consisting primarily of the proceeds of special taxes levied and collected by the County on properties within the District, as described herein. The Junior Lien Bonds are payable from Special Tax Revenues, subordinate to the lien of the Senior Lien Bonds.

Ownership of the Junior Lien Bonds is subject to a significant degree of risk. The Junior Lien Bonds are not rated by any national rating agency. Accordingly, there may be a limited trading market for the Junior Lien Bonds. Potential investors are advised to read carefully the section entitled "SPECIAL RISK FACTORS."

The District has applied for a municipal bond insurance policy and a Qualified Reserve Account Credit Instrument, and will decide whether to purchase any such municipal bond insurance policy or Qualified Reserve Account Credit Instrument in connection with the pricing of the Bonds, and anticipates using the municipal bond insurance policy for some or all of the Senior Lien Bonds..

MATURITY SCHEDULE
(see inside cover)

The Bonds, the interest thereon, and any premiums payable on the redemption of any of the Bonds, are not an indebtedness of the County, the State of California (the "State") or any of its political subdivisions, and neither the County (except to the limited extent described herein), the State nor any of its political subdivisions is liable on the Bonds. Neither the faith and credit nor the taxing power of the County (except to the limited extent described herein) or the State or any political subdivision thereof is pledged to the payment of the Bonds. Other than the Special Taxes, no taxes are pledged to the payment of the Bonds. The Bonds are not a general obligation of the County, but are limited obligations of the County payable solely from the Special Taxes as more fully described herein.

This cover page contains certain information for quick reference only. Potential investors must read this entire Official Statement to obtain information essential for making an informed investment decision. Investment in the Bonds involves risks that may not be appropriate for some investors. See "SPECIAL RISK FACTORS" for a discussion of special risk factors that should be considered in evaluating the investment quality of the Bonds.

The Bonds are offered when, as and if issued by the County and accepted by the Underwriter, subject to approval as to their legality by Jones Hall, A Professional Law Corporation, San Francisco, California, Bond Counsel, and subject to certain other conditions. Jones Hall has also served as disclosure counsel to the County. Certain matters will be passed upon for the County by the County Counsel. Certain matters will be passed upon for the Underwriter by its counsel, Stradling, Yocca, Carlson & Rauth, a Professional Corporation, Newport Beach, California. It is anticipated that the Bonds, in book-entry form, will be available for delivery through the facilities of DTC on or about ____, 2016.

STIFEL

The date of this Official Statement is: _____, 2016.

* Preliminary; subject to change.

Disclosure Obligations

- **SEC regulatory mandate**
  - Market transparency for investors
  - SEC doesn't directly regulate municipal issuers except for anti-fraud statutes.
  - SEC compels municipal reporting by requiring underwriter to secure agreement per SEC Rule 15c2-12(b)(5)
- **Continuing disclosure**
  - Issuer provides annual information
  - Developer often provides semi-annual updates until key milestones are met
  - Notice required for material events

Securities Exchange Act of 1934 Rule 10b-5:

"It shall be unlawful for any person. . .

(a) to employ any device, scheme or artifice to defraud,

(b) to make any untrue statement of a material fact or to omit to state a material fact necessary in order to make the statements made, in light of the circumstances under which they were made, not misleading. . ."

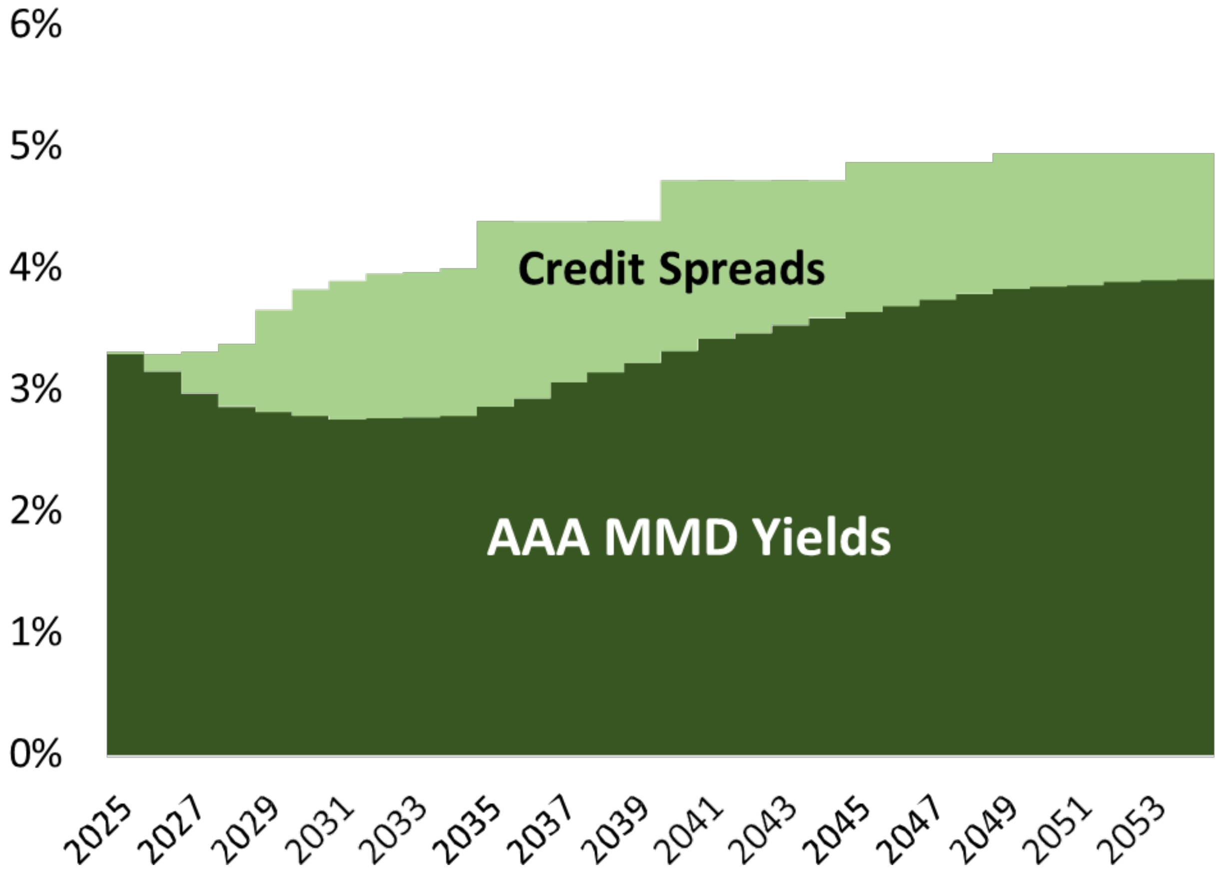
=> Applies to any circumstance where a municipal bond issuer is "*speaking to the market,*" including when filing annual Continuing Disclosure Reports or Event Notices.

Marketing Land Secured Issues

- **Narrower investor base for land-secured credits**
  - Subset of general municipal bond buyers
  - More sensitive to supply/demand trends
- **Institutional Investors**
  - Bond funds, money managers, commercial banks, bank trust departments, insurance companies, hedge funds
  - Generally prefer larger, more liquid bond issues
  - About 25 firms participate in sector, 3-5 are most active
- **Sophisticated “retail” investors**
  - High net-worth individuals, seeking stability, tax-free income and yield
  - Focus on stronger “story” credits, nominal yields

Borrowing Costs for Land Secured Bonds

- **Municipal bonds are typically priced in relation to the tax-exempt AAA Municipal Market Data (MMD) index**



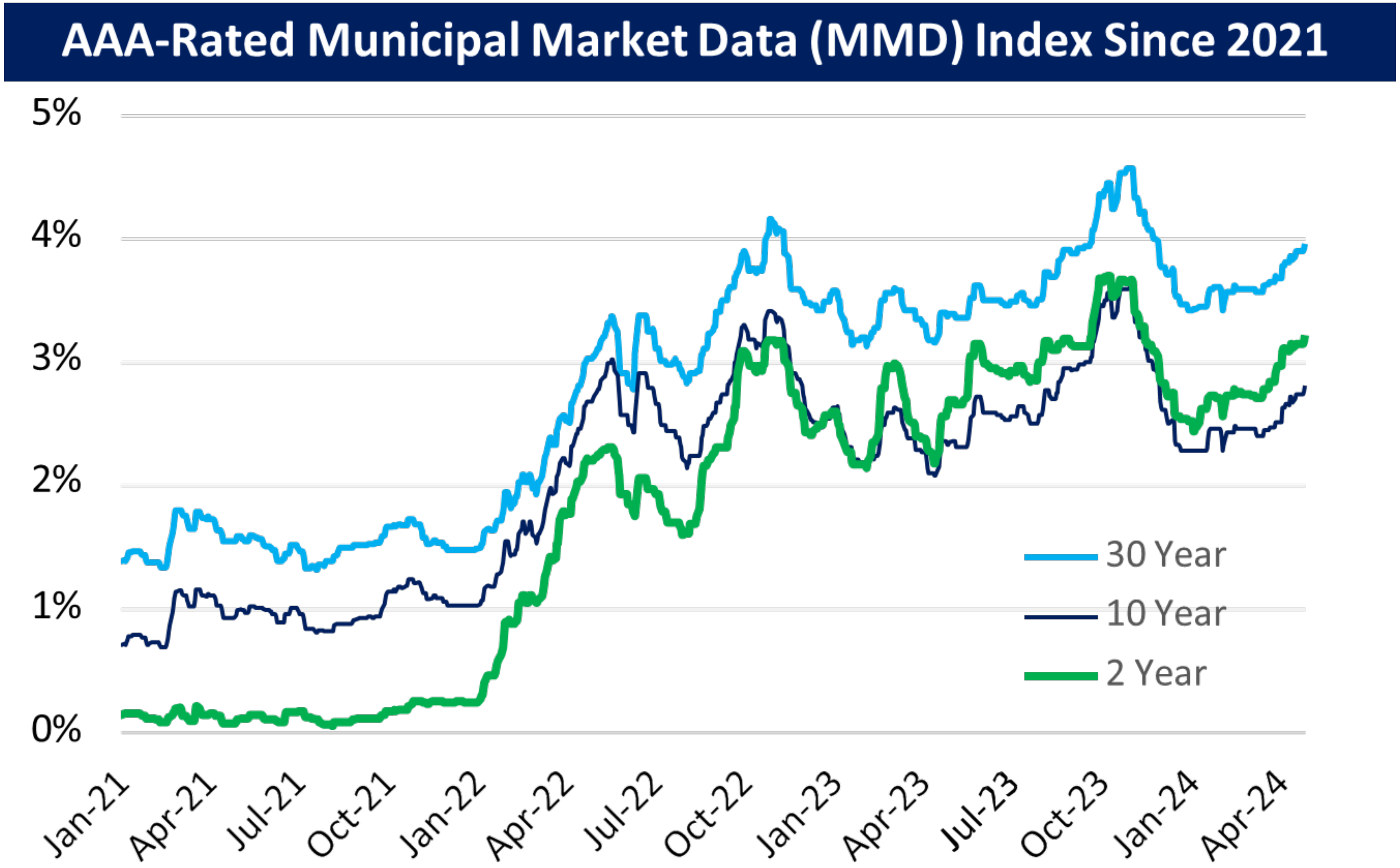
What affects credit spreads?

- Overall project appeal
- Development momentum
- Value-to-lien ratio
- Size of borrowing/liquidity
- Nominal rate environment
- High yield supply/demand
- *Ratings (if applicable)*

What affects benchmark yields?

- Level of general interest rates
- Expectations for future inflation
- Supply/demand dynamics

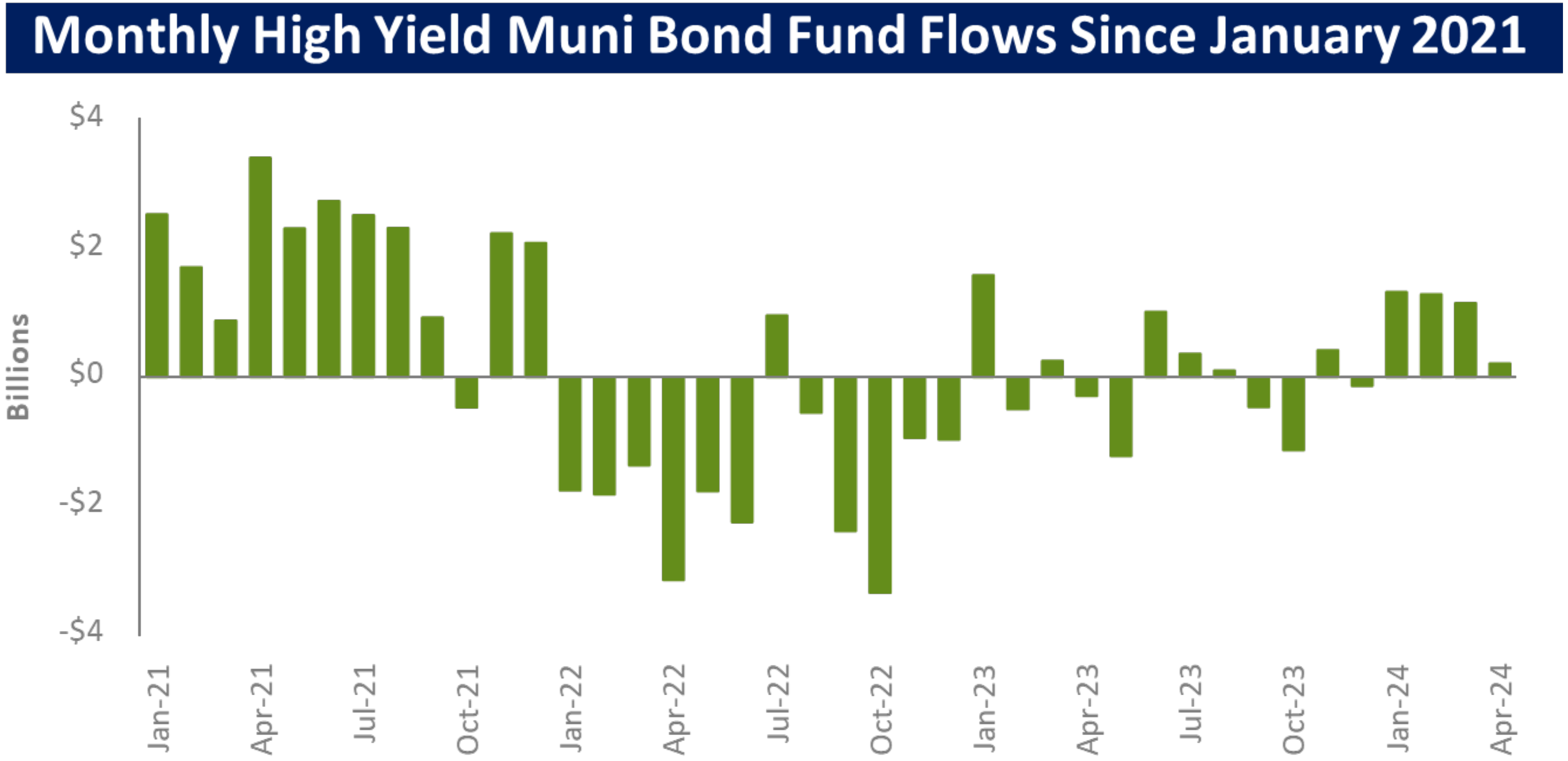
Recent Tax-Exempt Interest Rate Trends



Sources: Thomson Reuters, As of April 26, 2024.

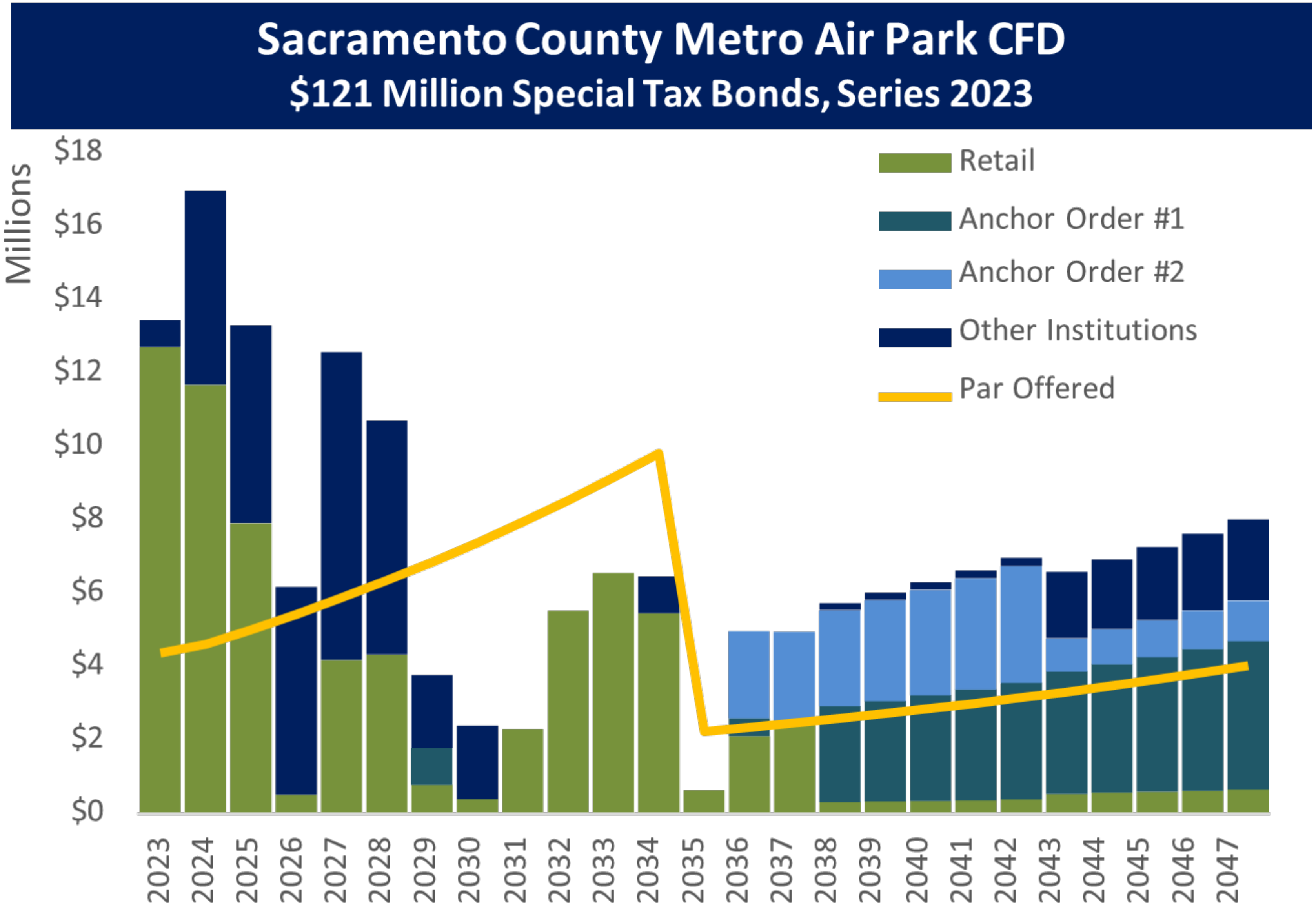
Investor Demand for Municipal Bonds

- **Monthly High Yield Municipal Bond Fund Flows evidence demand**
  - Significant inflows in 2021, net outflows in 2022, fluctuating levels in 2023



Sources: Lipper, Thomson Reuters, SIFMA. As of April 26, 2024.

Illustrative Investor Participation



Retail Interest

- 220 individual orders, totaling $72 million

⇒ *Increases ability to use serial maturities*

⇒ *Provides pricing leverage with institutions*

⇒ *Enhances future liquidity*

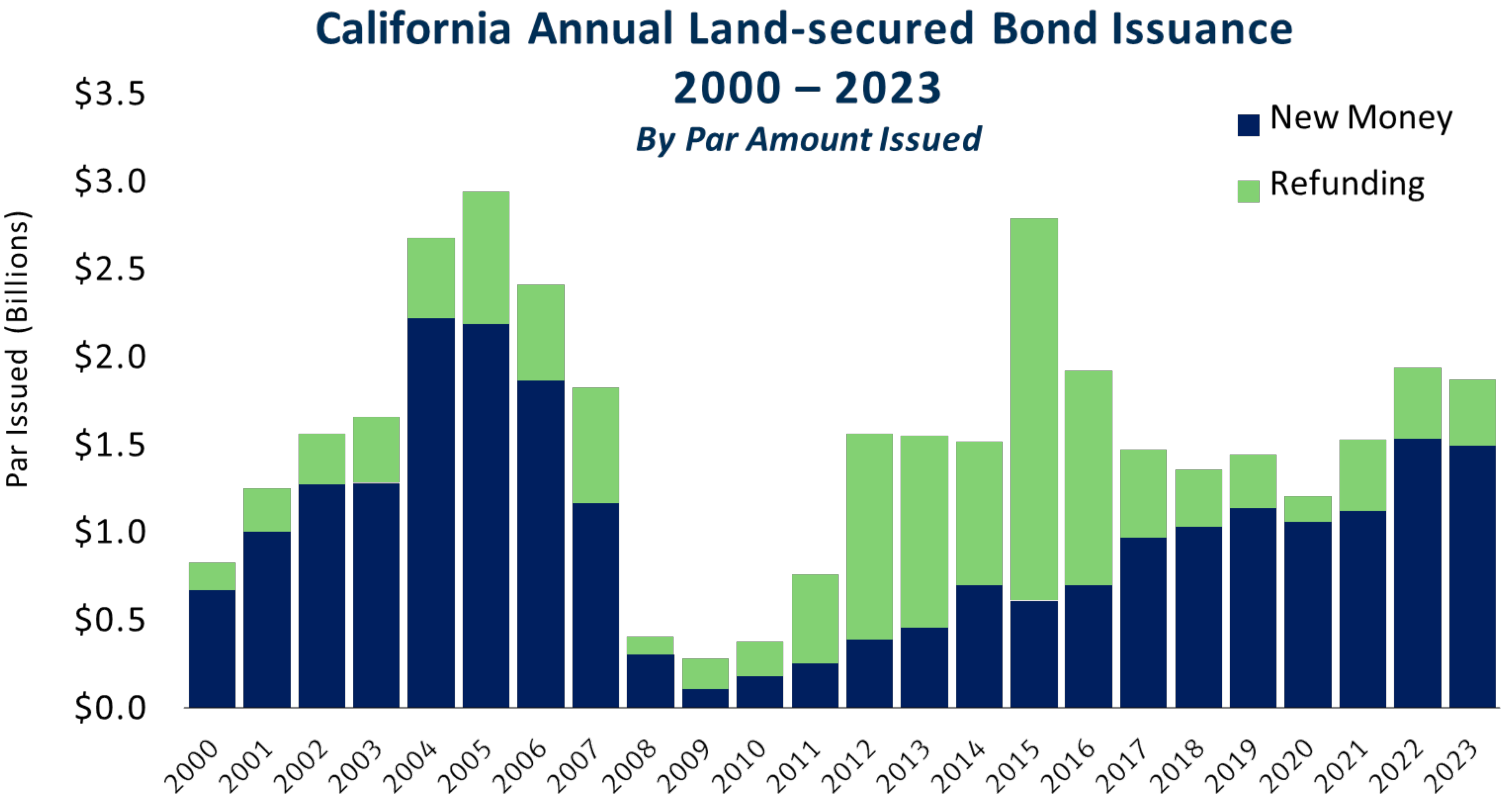
Institutional Interest

- 8 institutions participated
- 2 “anchor orders”

Private Placement Alternatives

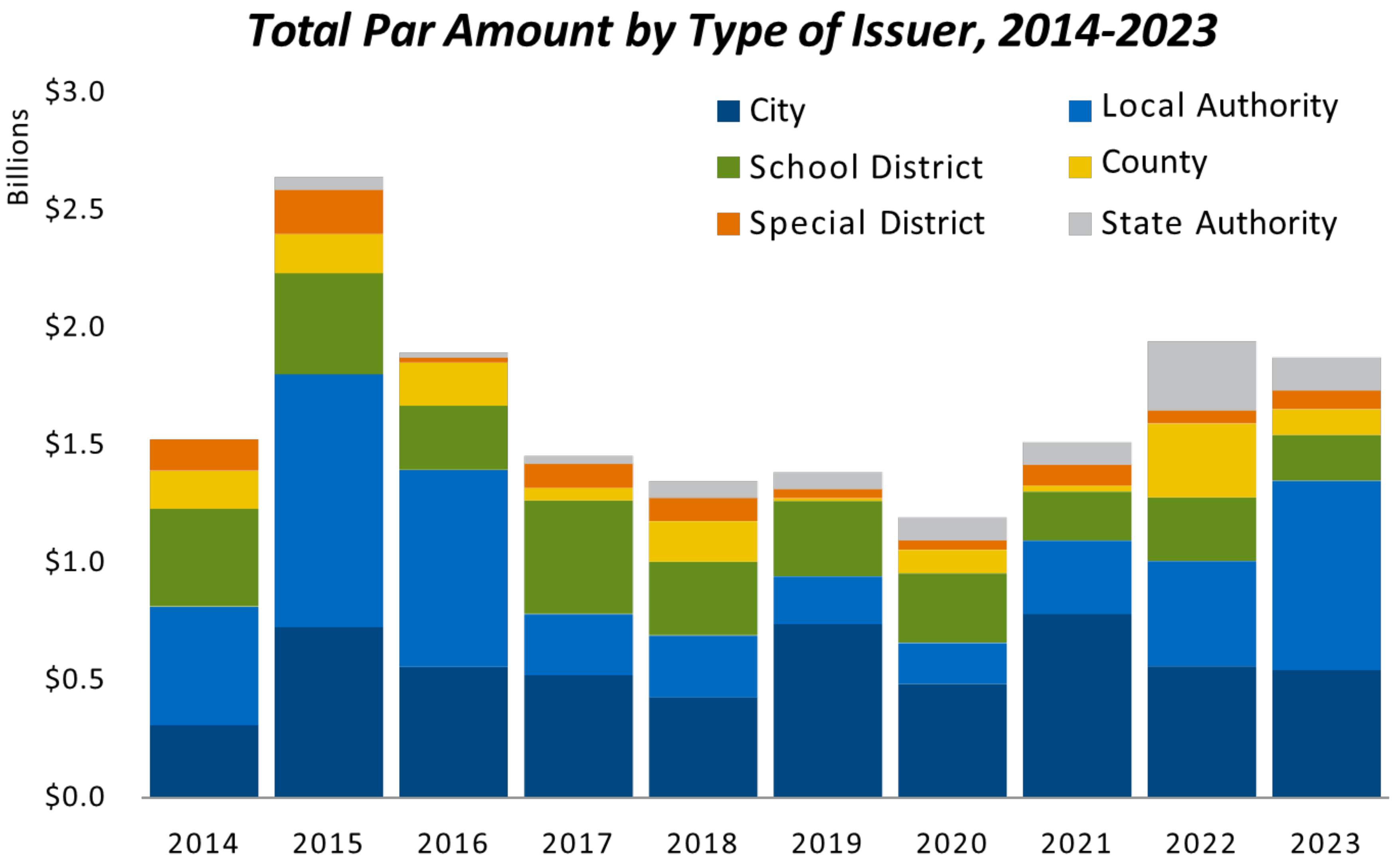
- **Distribution to smaller universe of buyers**
- **To commercial banks for cost, ease and timeliness**
  - Higher credit quality
  - Shorter tenor (generally < 10 years or < 20 years)
  - Smaller to moderate in size
- **To sophisticated institutional or individual investors for “suitability”**
  - Higher risk tolerance
  - Often larger denominations ($100,000 or $250,000)
  - Possible “big boy” letter
- **Consequences for interest rate and liquidity**
  - *Regional bank failures in 2023 have limited interest*

California Land Secured Bond Market



Source: Lipper, Thomson Reuters as 1/8/2024

Land-Secured Issuance by Type of Issuer

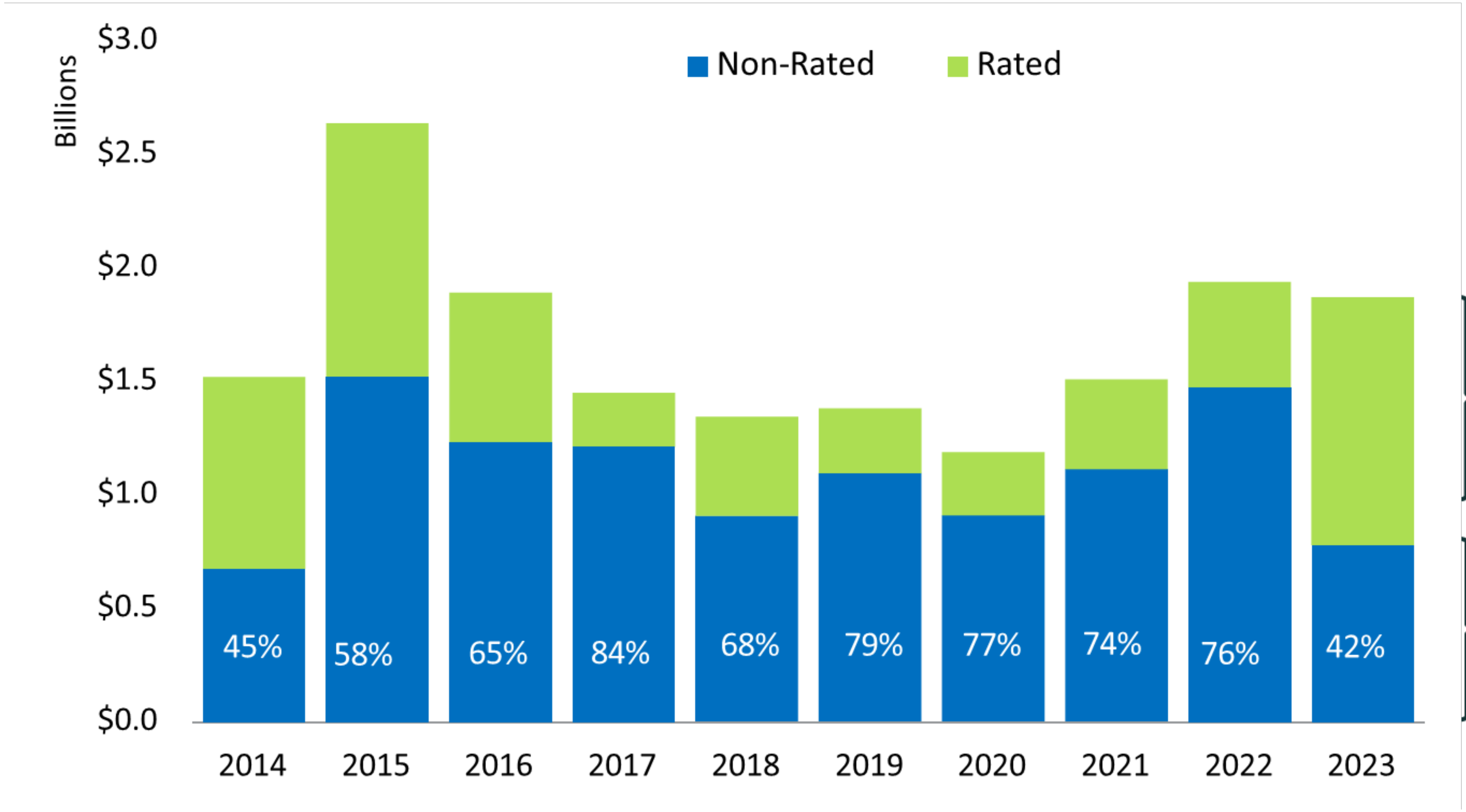


About 2/3rds of issuance is by cities and local authorities

Source: Lipper, Thomson Reuters as 1/8/2024

Land-Secured Bond Sales: Rated or Non-Rated

Total Par Amount Issued With and Without Ratings, 2014-2023

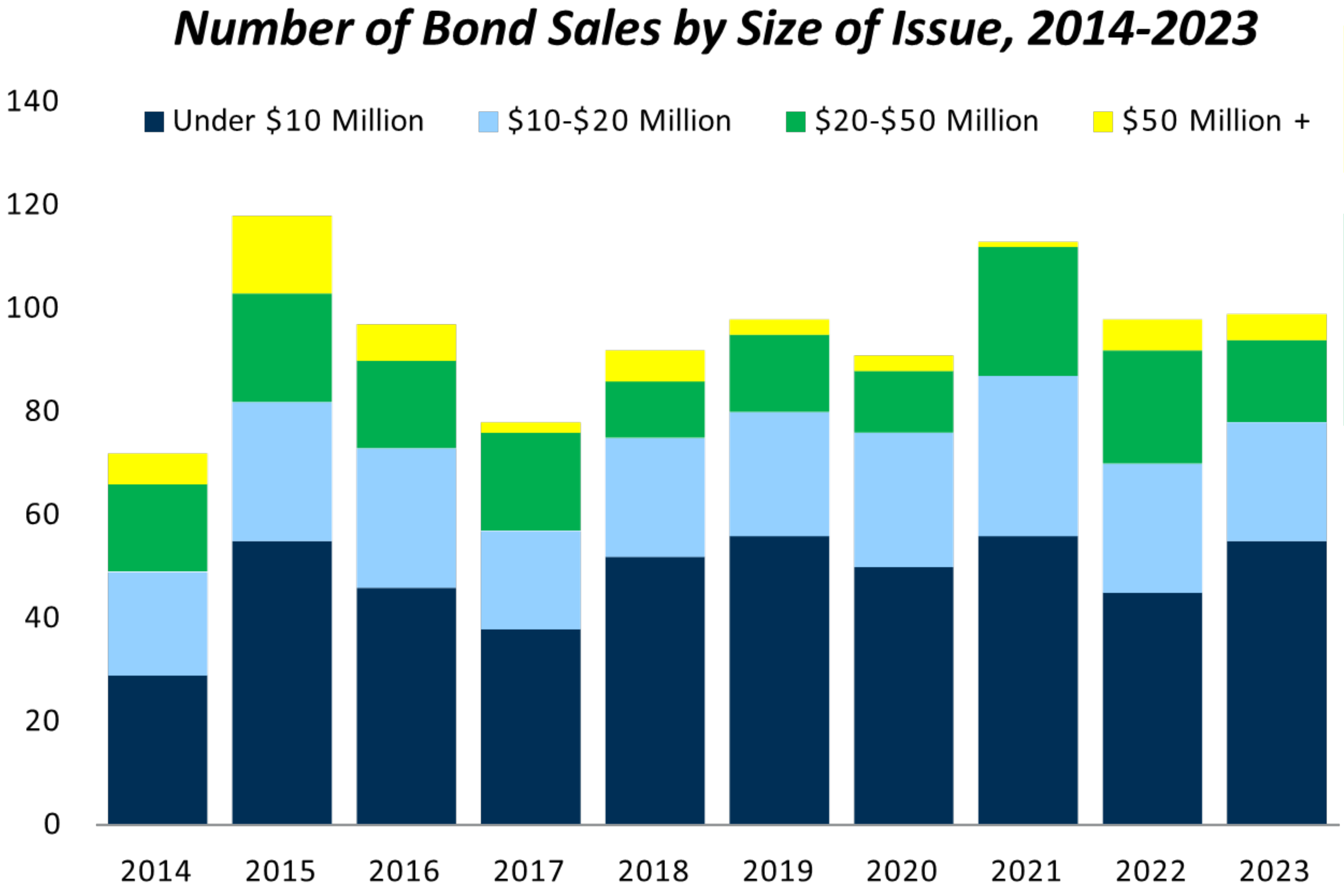


Investment grade credits are typically built-out, diversified residential districts

About 65% of land-secured issuance in last decade was sold without rating

Source: Lipper, Thomson Reuters as 1/8/2024

Land-Secured Issuance by Size of Bond Sale



6% of issues and 1/3rd of par > $50 million

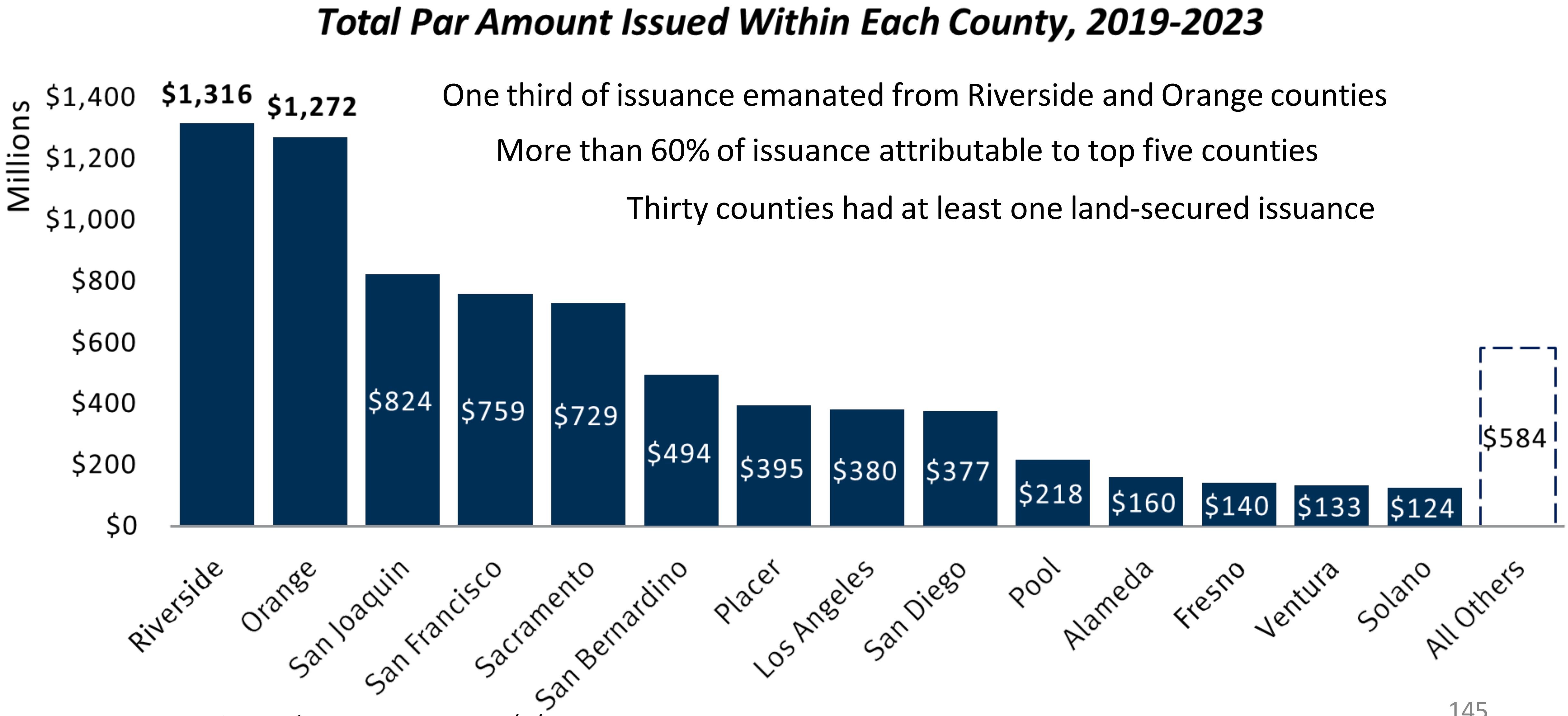
18% of issues and 1/3rd of par between $20-$50 million in size

76% of issues and 1/3rd of par less than $20 million in size

About half of issues less than $10 million

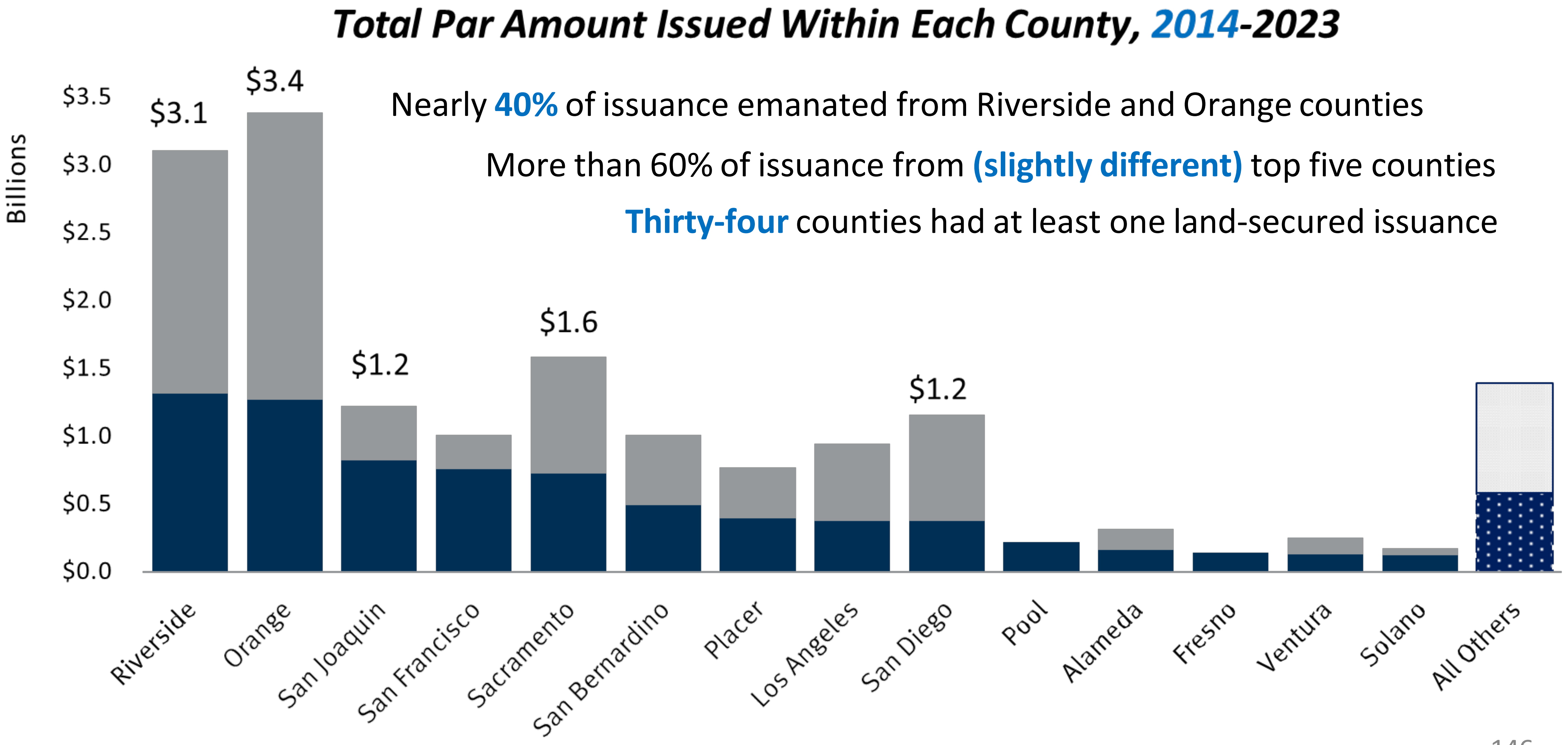
Source: Lipper, Thomson Reuters as 1/8/2024

Land-secured Bond Sales by County - Last 5 Years



Source: Lipper, Thomson Reuters as 1/8/2024

Land-secured Bond Sales by County - Last 10 Years



Source: Lipper, Thomson Reuters as 1/8/2024

Summary Statistics for Non-Rated Bond Sales

	Year			
	2020	2021	2022	2023
Average Par Amount	$8.849M	$9.984M	$13.719M	$10.925M
Total Par Amount	$734.43M	$1018.34M	$1221.02M	$950.47M
Value to Lien (VTL)	11.49	11.97	12.12	11.26
% Building Permits Issued	70%	68%	69%	66%
% Closed to Individual Homeowners	50%	41%	41%	41%
Average Underwriter Discount	13.16	13.58	13.79	15.33
Public Offerings	66	88	86	74
Direct Placements	17	14	3	13
Number of Transactions	83	102	89	87

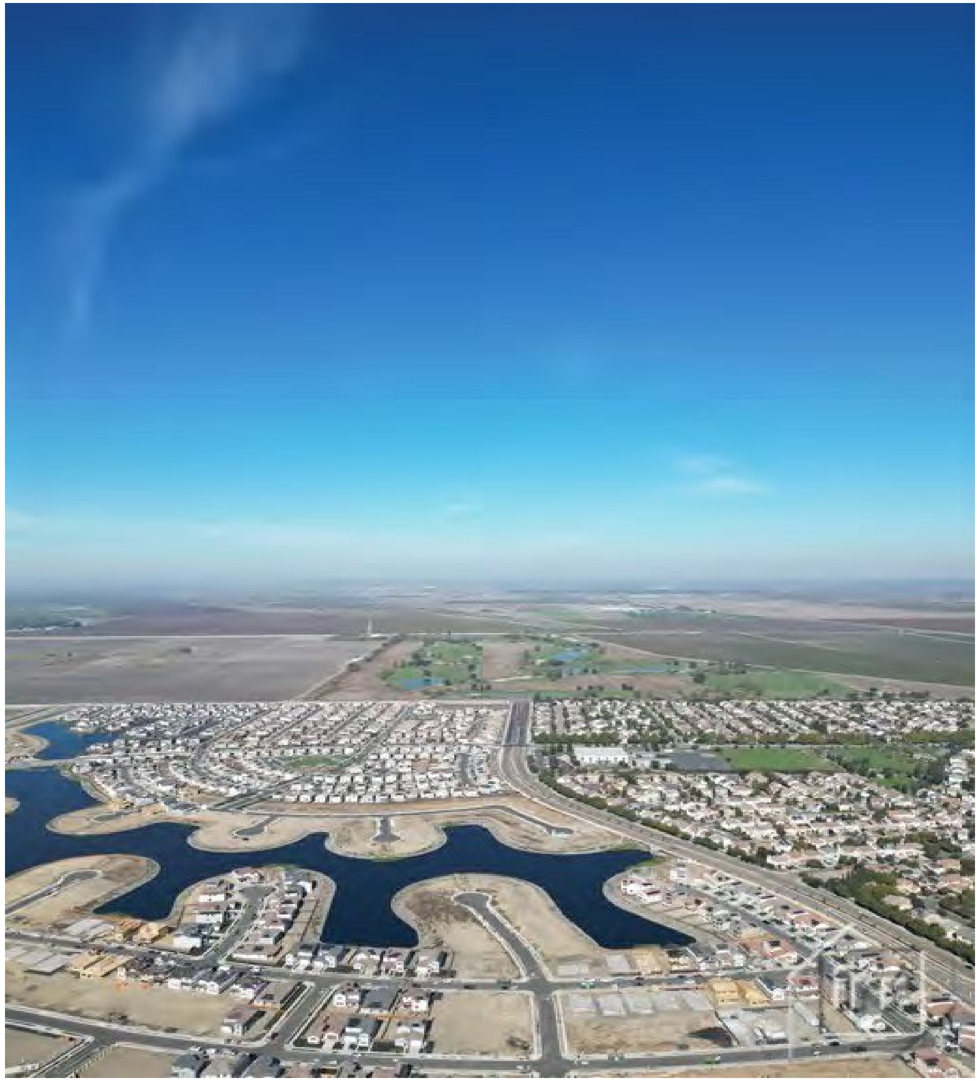
Temecula – Heirloom Farms CFD No. 20-01

- **$12,695,000**
  - Sold on February 28, 2024
  - Funded City infrastructure, school fees and water fees
- **321 Planned Homes**
  - 210 attached and 111 detached
  - Meritage Homes is the Builder
- **Significant momentum**
  - 82% of parcels with building permits
  - 118 homes sold to individuals
- **Value to Lien Ratio of 8.4:1**
- **Effective Tax Rate of 1.78%**
- **True Interest Cost of 4.812%**

Riverside – Kunny Ranch CFD No. 2013-1

- **$4,140,000 par**
  - Sold March 28, 2024
  - Funded City infrastructure and school fees
- **All building permits pulled**
- **74 Detached Residential Units**
  - Beazer Homes is the builder
- **118 Homes sold to individuals**
- **Value to Lien Ratio of 15.54:1**
- **Effective Tax Rate of 1.55%**
- **True Interest Cost of 4.717%**

Stockton – Westlake Villages II CFD No. 2018-2 IA No. 3



- **$14,020,000 par**
  - Sold April 3, 2024
  - Funded City Infrastructure, School Fees and Water Fees
- **277 Residential Units**
  - Meritage Homes is the Builder
- **Significant momentum**
  - 77% of parcels had Building permits
  - 95 Homes sold to individuals
- **Value to Lien Ratio of 5.48:1**
- **Effective Tax Rate of 1.85%**
- **True Interest Cost of 5.02%**

Folsom – Folsom Ranch CFD No. 23 IA No.2

- **$10,690,000 par**
  - Sold April 11, 2024
  - Funded City Infrastructure
- **291 Residential Units**
  - Tri Pointe and Lennar are the Builders
- **57% of parcels had building permits**
- **71 Homes sold to individuals**
- **Value to Lien Ratio of 7.0:1**
- **Effective Tax Rate of 1.84%**
- **True Interest Cost of 4.978%**

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15-MINUTE

BREAK

SESSION SEVEN

Ongoing District Administration

Susan Goodwin, Managing Principal, Goodwin Consulting Group, Inc.

Bradley R. Neal, Shareholder, Stradling Yocca Carlson & Rauth

Ongoing CFD Administration

- Calculate Annual Special Tax Levy
- Monitor and Manage Delinquencies
- Calculate Arbitrage Rebate Due to Federal Government
- Comply with Federal and State Disclosure Requirements
- Other Annual CFD Administration Responsibilities

Ongoing CFD Administration

Calculating the Annual Special Tax Levy

- Assign taxable parcels to appropriate special tax category
- Calculate “Special Tax Requirement”
  - Debt Service
  - Administrative Expenses
  - Pay-as-you-go Facilities Costs
  - Services Costs
- Apply RMA to determine special tax for each parcel
- Submit levy to Auditor’s Office before deadline (usually 1st week of August)
- With almost all CFDs, no action required from legislative body

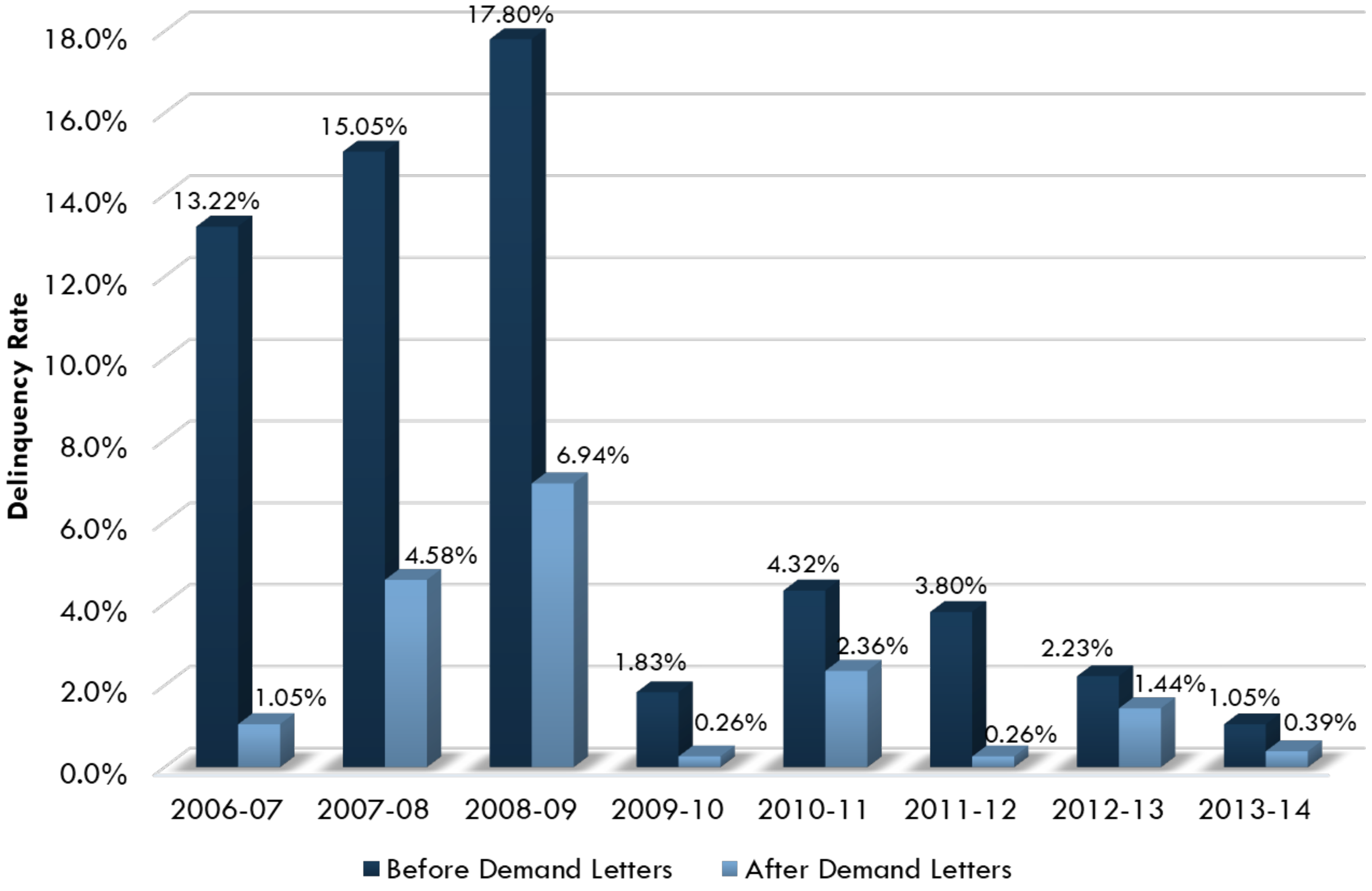
Ongoing CFD Administration

<u>Delinquency Management</u>

- Demand letters should be sent immediately after missed payments (For large tax payments, after both December and April installments)
- For homes in foreclosure, send demand letters to bank
  - Mello-Roos special tax lien is senior to mortgage lien
  - Accelerated foreclosure provision is an effective motivator
- Even in Teeter Plan counties, <u>don't wait to act</u>
  - Cumulative delinquencies are harder to remedy
  - Land-secured districts can be removed from Teeter at any time
- Strip Mello-Roos taxes if homeowner cannot pay full tax bill
- Inform Tax Collector that payment plans will not work for special taxes and assessments

Managing Special Tax Delinquencies

Sample of Central Valley CFDs during Great Recession



Ongoing CFD Administration

Arbitrage Rebate Calculations

- "Positive arbitrage" occurs when interest rate earned on bond proceeds is greater than interest rate paid on bonds
- Every 5 years, earnings must be rebated to the Internal Revenue Service within 60 days after end of 5^{th} year
- Doing an annual calculation avoids trying to collect large amount in fifth year, which may be impossible within maximum tax rates
- Applies to proceeds from bond issue. Does not generally apply to PayGo revenues.

Disclosure Obligations

SEC regulatory mandate

- Market transparency for investors
- SEC doesn't directly regulate municipal issuers except for anti- fraud statutes.
- SEC *compels* municipal reporting by requiring underwriter to secure agreement per SEC Rule 15c2- 12(b)(5)

Continuing disclosure agreement

- Issuer promises ongoing information for investors to monitor value of the security

SEC Focus on MCDC

Securities Exchange Act of 1934
Rule 10b-5:

"It shall be unlawful for any person. . .

(a) to employ any device, scheme or artifice to defraud,

(b) to make any untrue statement of a material fact or to omit to state a material fact necessary in order to make the statements made, in light of the circumstances under which they were made, not misleading. . ."

=> Applies to any circumstance where a municipal bond issuer is "***speaking to the market***," including when filing annual Continuing Disclosure Reports or Event Notices.

Continuing Disclosure Commitment

Continuing Disclosure Agreement

- Form included in Preliminary Official Statement sent to investors
- Executed at bond closing

Ongoing Reports

- Timing specified in agreement
- Annual audited financial statements
- Certain updates to information in the Official Statement

"Material Events" Reporting

- Within 10 days of occurrence

CDIAC Reports

Material Events

- Delinquent payment of principal or interest
- Unscheduled draws on debt service reserve funds
- Unscheduled draws on credit enhancement
- Substitution of credit or liquidity providers, or their failure to perform
- Tender offers
- Defeasance of the Bonds
- Rating changes
- Bankruptcy, insolvency, receivership or similar event of obligated person
- Other events - if material

Annual Reporting

- **SEC Rule 15c2-12 (Continuing Disclosure)**
  - Obligated persons: Issuer and Developer
  - Annual/semi-annual/quarterly reports and notice of listed events
  - File on the EMMA System of the Municipal Securities Rulemaking Board
- **California Debt and Investment Advisory Commission**
  - Yearly Fiscal Status Report: October 30 deadline
  - Annual Debt Transparency Report: Jan. 31 deadline
  - 10-day significant event reporting: form provided
- **State Controller's Office**
  - AB 2109 Parcel Tax Reporting: included in Financial Transactions Report
- **Local Agency Special Tax & Bond Accountability Act (SB 165)**
  - Report filed with Clerk each year
  - CFD Administration Report will suffice
- **Assembly Bill 1483**
  - Requires public agencies to post on website a current schedule of fees, exactions, and affordability requirements imposed on housing developments
  - Special taxes <u>are</u> an exaction and must be posted
  - Information must be updated within 30 days of any changes, including annual escalation of special taxes

IRS Spending and Tracing Requirements for Municipal Bond Proceeds

Investment of bond proceeds

- Must be consistent with permitted investments set forth in Indenture/Fiscal Agent Agreement, issuer's investment policies and IRS Regulations

Bond proceeds are subject to Arbitrage calculation/rebate:

- Calculate and pay arbitrage rebate every 5 years, if any
- Only applicable if investment earnings exceed bond yield
- Various exceptions to arbitrage rebate available for:
  - Bona fide debt service funds
  - Construction funds
    - 6-month expenditure
    - 18-month expenditure
    - 24-month expenditure

IRS Spending and Tracing Requirements for Municipal Bond Proceeds

Bond proceeds transferred to other agencies pursuant to Joint Community Facilities Agreements must be traced as well.

- Preferable not to disburse bond proceeds to other public agencies except for reimbursement

Bond proceeds should be traced for the term of the bonds plus 3 years.

IRS spend down requirements for new money bond proceeds in the construction fund:

- 3-year temporary period (85% rule)
- 5-year hedge bond rules
  - Year 1 = 10%
  - Year 2 = 30%
  - Year 3 = 60%
  - Year 5 = 85%

Other Annual CFD Administration Responsibilities

- Reconcile bank statements from fiscal agent/trustee
- Prepayment calculations
- Record releases of special tax lien
- Disbursing/investing bond proceeds
- Acquisition of facilities
- Answer questions from homeowners, appraisers, realtors, bond investors

Consultants or Staff?

Considerations

- Experience of staff
- Existing workload
- Number of CFDs formed by agency
- Complexity of CFDs
- Combined Approach

THANK YOU

Please complete the seminar evaluation and leave it on your table.

UPCOMING EVENTS

Municipal Debt Essentials
September 24 – 26, 2024 | Pomona, CA

Annual Municipal Disclosure Training
October 10, 2024 | Webinar

23rd Annual CDIAC Pre-Conference to *The Bond Buyer's* California Public Finance Conference
October 23, 2024 | San Francisco, CA

Practical Adaptations to the Evolution of Credit Ratings
November 19, 2024 | Webinar

For more information, visit:
treasurer.ca.gov/CDIAC/seminars