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## Letter of Intent

June 13, 2025

Planning and Community Development  
El Paso County, Colorado  
Attention: Kari Parsons  
2880 International Circle, Suite 110  
Colorado Springs, CO 80910

Re: Letter of Intent for the Proposed Wilshire Metropolitan District Nos. 1 and 2

Dear Ms. Parsons:

This Letter of Intent is being submitted on behalf of Marksheffel Business Center, LLC and CH Communities II, LLC (the “**Developer**”), for the organization of the Wilshire Metropolitan District Nos. 1 and 2 (individually, “**District No. 1**” and “**District No. 2**” and collectively, the “**Districts**”) located wholly within El Paso County, Colorado (the “**County**”).

The Districts shall be organized pursuant to and in accordance with the provisions in Title 32 of the Colorado Revised Statutes, Chapter Nine of the County Land Development Code, and the County Special District policies. The Districts’ boundaries will include the remaining portions of the Wilshire development (the “**Project**”) located wholly within the County’s boundaries. The Project will consist of 44 single family residential units (ranging from 5,000 to 6,000 square feet in size) within the previously approved Wilshire Filing No. 3 subdivision and an additional 270 higher density single family residential units on approximately 3,500 square foot lots within the remaining portion of District No. 1 located near or adjacent to the Sand Creek tributary channel. The Project will also include approximately 55,000 square feet of commercial development within proposed District No. 2 and located between the Sand Creek tributary channel and Marksheffel Road. Each District includes land that is located within the Sand Creek tributary channel. Both Districts will be responsible for financing and constructing the required channel improvements.

The current Wilshire Development PUD (Planned Unit Development) Plan allows for both residential and commercial land uses. The PUD Plan allows for a total of 300 multi-family residential units and 8.3 acres of commercial development. The PUD Plan also allows for 4.0 acres of industrial development to be located between the commercial and multi-family residential development. The PUD Plan may need to be amended to change the land use designation of the existing industrial area to match the same multi-family residential land use as currently defined within the Wilshire Development PUD Plan. This land use designation change will be a downzoning from the existing, more intense industrial designation already approved under the

current Wilshire Development PUD Plan; therefore, it is reasonable to conclude that the planned residential development will be compatible with the area and can, therefore, be appropriately relied upon to support the provisions of the proposed service plan including the assumptions and the projections of Exhibit B of the proposed Districts' Service Plan, which includes the Financial Plan Summary.

#### **A. Purpose of the Districts**

The Districts are independent units of local government, separate and distinct from the County, and, except as may otherwise be provided for by State or local law or the Service Plan, their activities are subject to review by the County only insofar as they may deviate in a material matter from the requirements of the Service Plan. It is intended that the Districts, in their discretion, will provide a part or all of various public improvements necessary and appropriate for the development of a project within the unincorporated County. The public improvements will be constructed for the use and benefit of all anticipated inhabitants, property owners and taxpayers of the Districts. The primary purpose of the Districts will be to finance the construction of these public improvements.

The Districts intend to finance and construct public improvements within the Project including, but not limited to, street improvements, water, sanitary sewer, stormwater and drainage, landscaping, and parks and recreation improvements and facilities. Additional major services will include the Districts' power to furnish covenant enforcement and design review services within the Districts' Boundaries, and any ongoing operation and maintenance of the public improvements within the Districts not otherwise dedicated to the County or third-party entities for ownership and/or ongoing operation and maintenance.

The Project is not presently served with the facilities and/or services proposed to be provided by the Districts, nor does the County nor any other special district have any plans to provide such services within a reasonable time and on a comparable basis. There are currently no private parties or other governmental entities, located in the immediate vicinity of the Districts that consider it desirable, feasible or practical to undertake the planning, design, acquisition, construction installation, relocation, redevelopment, and financing of the public improvements needed for the Project. The Districts' formation is therefore necessary to provide the most economic development of the public improvements required for the Project.

The Developer anticipates Falcon Fire Protection District will provide fire protection services and Cherokee Metropolitan District ("**Cherokee**") will provide water and sanitary sewer services to the Districts following construction of the public improvements. The Districts anticipate entering into an intergovernmental agreement with Cherokee for the payment and provision of water and sanitary sewer services. It is anticipated that the Districts shall finance and construct water and sanitary sewer facilities, which shall in turn be dedicated to Cherokee.

#### **B. Justification for Multiple District Structure**

The Project includes both residential and commercial planned development that is proposed to be constructed over the next several years. District No. 1 will be a residential district

and District No. 2 will be a commercial district. Pursuant to the proposed Service Plan, each District will be authorized to provide improvements and services to the property within and without their respective legal boundaries, as they may be amended from time to time. Agreements are expected to be executed by the Districts in order to clarify the respective responsibilities and the functions and services provided by each District. The benefit to this arrangement is that each District represents a different land use and future land owner, particularly when comparing commercial land ownership to residential land ownership and the option to impose varying mill levies, but by establishing agreements between the Districts all of the functions of each District can be performed in a more cost effective and orderly manner. In addition, this arrangement between the two Districts will also allow the Districts to perform their responsibilities in a much more functional manner while still allowing for resident and owner representation, particularly when compared to the multiple district with a control district arrangement.

Creating the two Districts will allow for varying mill levies to be set between the residential and commercial development areas. It is important to note, however, that both Districts will be responsible for financing and constructing all public improvements within the development. This is particularly important given the nature of the improvements necessary to improve the Sand Creek tributary channel and to construct the Colorado Tech Drive crossing over the channel extending west from Marksheffel Road to the existing residential neighborhoods and the additional planned residential development. Both improvements will provide a regional benefit and will need to be financed through both Districts.

### **C. Development and Financial Plans**

The property within the Project is currently undeveloped. The Service Plan estimates the total infrastructure cost within the Districts as approximately \$16,219,688.38 in 2025 dollars. The Developer's licensed civil engineer prepared the infrastructure cost estimates. These initial cost estimates are preliminary in nature and may fluctuate due to inflation and other external forces outside of Developer's control. The Service Plan's financing model provides an example of how the Districts may finance the public improvements. The financing model is a summary of development assumptions, projected assessed valuation, description of revenue sources (including applicable mill levies and fees) and expenses for both operations and debt service, and an overall debt capacity model associated with projected future development of the Project. The model demonstrates that the Districts can provide sufficient and economic service within the Project, and that the Districts have or will have the financial ability to discharge the Districts' Debt on a reasonable basis. Any debt issued will be in accordance with the Service Plan's limitations. Prior to the issuance of any debt, the Developer may pay for the public improvements' costs, organizational costs, and operations and maintenance costs and subsequently may be reimbursed by the Districts. It is anticipated that in the formative years the Districts will have shortfalls in funding its capital costs and monthly operations and maintenance expenses. The Developer may fund these obligations for the Districts to promote the Project's development subject to the Developer being repaid from future District revenues as described and limited within the proposed Service Plan.

## **D. Compliance with County Master Plans**

### **1. Compliance with the EPC Master Plan**

Chapter 1 of the Your El Paso Master Plan (2021) states that the Plan is “general in nature- it cannot tackle every issue in sufficient detail to determine every type of necessary action.” In addition, Chapter 1 goes on to state that the Plan “is intended to provide clearer and more coordinated policy, resulting in a document that effectively communicates County goals and identifies specific actions to achieve both County-wide and local area objectives.” When taken together, these two statements suggest to the reader that the Plan may only address certain issues at a cursory level and that specific steps or actions for addressing such issues may not be offered within the Plan. That conclusion is certainly the case in numerous instances and with regard to a variety of topical areas.

### **Chapter 3 Land Use**

#### **Key Area Analysis: “Enclave or Near Enclave”**

The property is located within the Enclave or Near Enclave Key Area. The Plan describes the key area as follows:

“Enclaves are areas of unincorporated El Paso County that are surrounded on all sides by an incorporated municipality, primarily the City of Colorado Springs but enclaves or near enclaves exist within or adjacent to other municipalities. The largest enclave is Cimarron Hills, an urbanized community with nearly 18,000 residents, but several smaller enclaves exist around other areas of Colorado Springs as well. ***The majority of the enclaves are developed or partially developed in a manner that would require significant improvement for annexation.*** These include roadway improvements, stormwater improvements and utility infrastructure upgrades. Most enclave areas are accessed by municipal roads, experience the impacts of urban stormwater runoff, or are otherwise served by one or more municipal utilities. ***The character and intensity of new development or redevelopment in these enclaves should match that of the development in the municipality surrounding it.*** Discussion with the City of Colorado Springs and other municipalities regarding the possible annexation of these areas should be continued and revisited regularly to explore means to finance improvements and service debt to make annexation a feasible consideration.”

Approval of the proposed Service Plan and the subsequent creation of the Districts will help support the existing character of the Cimarron Hills area, which has developed with higher density urban residential developments and commercial storefronts along the Marksheffel Road corridor. The proposed combination of urban level residential development within District No. 1 and the commercial development within District No. 2 will further enhance the land use transition that occurring within this area of the County. Development of the property has been planned for several decades and is anticipated by Cherokee with respect to providing water and wastewater service to the development.

The Key Area description for “Enclave or Near Enclave” perfectly describes this specific enclave area in that the area can be accessed by municipal roads, such as Marksheffel Road and Constitution Avenue, and it experiences impacts from urban stormwater runoff, particularly along the Sand Creek and its tributaries. However, at this time it is not financially feasible for the City of Colorado Springs to annex this property within the proposed districts nor are Colorado Springs Utilities services necessary to ensure provision of adequate urban level services.

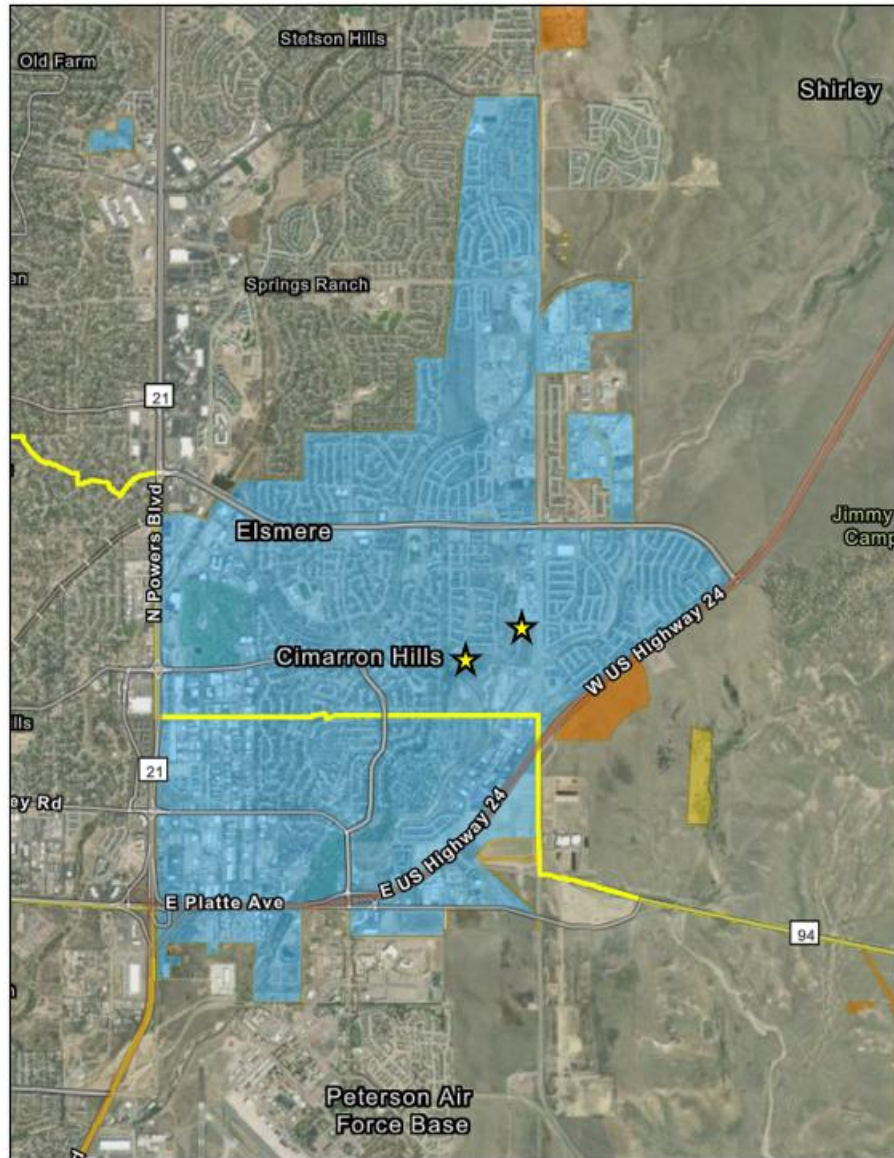
**Area of Change Analysis: “Transition”**

The property proposed to be located within the initial inclusion area is identified in the Areas of Change map within the Plan as being within the “Transition” area of change (see the map on the next page for the location of the initial inclusion area within the overall “Transition” area).

***“Transition” Area of Change***

Page 21 of the Plan characterizes areas of “Transition” by stating:

“Transition areas are fully developed parts of the County that may completely or significantly change in character. In these areas, redevelopment is expected to be intense enough to transition the existing development setting to an entirely new type of development. For example, a failing strip of commercial development could be redeveloped with light industrial or office uses that result in a transition to an employment hub or business park. Another example of such a transition would be if a blighted suburban neighborhood were to experience redevelopment with significant amount of multifamily housing or commercial development of a larger scale in line with a commercial center.”



Your El Paso Master Plan identifies only 1% of land within the unincorporated County as being within an Area of Change for “Transition” making this particular area of the County very unique while suggesting that urbanization, through more dense residential development and additional commercial development, is appropriate and expected.

**Placetype Analysis: “Urban Residential”**

The subject property is shown on the Placetypes map of Your El Paso Master Plan as being within the Urban Residential Placetype.

Page 30 of the Plan identifies the following land uses as being Primary Land Uses within the Urban Residential Placetype:

- Single-Family Detached Residential (5 units/acre or more)

- Single-family Attached Residential
- Multifamily

In addition, the Placetype includes the following Supporting Land Uses:

- Mixed Use
- Restaurant
- Commercial Retail
- Commercial Services
- Institutional
- Parks
- Office

The Urban Residential Placetype is described further on page 30 as follows:

“The Urban Residential placetype consists of established neighborhoods immediately adjacent to equally dense or more dense urban neighborhoods in incorporated areas, *as well as new, largely residential neighborhoods in previously undeveloped areas where centralized utility services are available.* The Urban Residential placetype provides for a mix of development densities and housing types within a neighborhood. Urban Residential placetypes generally support accessory dwelling units as well. The dense urban development and high intensity of existing Urban Residential areas make it difficult to distinguish them from adjacent incorporated areas. The development of an Urban Residential place-type will strongly depend upon availability of water and wastewater services.

An interconnected network of pedestrian and bicycle infrastructure make Urban neighborhoods walkable internally and well-connected to adjacent placetypes. Highly accessible parks and open space are integrated throughout the neighborhood. *Neighborhood-serving retail areas in this placetype should be conveniently connected and accessible to residents of the nearby neighborhood. Commercial uses should be located along main or perimeter streets rather than imbedded within primarily residential areas. Cimarron Hills is the most prominent example of this placetype.*” (emphasis added)

Continued development of the Wilshire neighborhood via urban level residential development in the proposed District No. 1 will be in keeping with the considerable recent development within the Marksheffel Road corridor in terms of density and will create additional housing stock in a growing, in-demand area of the County. In addition, locating the proposed commercial development that is planned to occur within District No. 2 along Marksheffel Road will perfectly align with the balance presented in the Master Plan between ensuring that commercial development is well-served by and adjacent to major roads while also being convenient to the nearby residential neighborhoods.

## **Chapter 4 Housing & Communities**

In addition to supporting and being in compliance with the applicable Areas of Change, Key Area, and Placetype designations and policies in Chapter 3 of the Master Plan, the proposed service plan is also in total alignment with the Residential Priority Development Area designation found in Chapter 4 of the Plan. The property proposed for initial inclusion into District No. 1 is identified as being within the Larger Enclave Priority Development Area as depicted on p. 51 of the Plan. Page 51 of the Plan describes this area as follows:

“Larger enclaves, including Cimarron Hills, currently exhibit the Urban Residential placetypes characteristics. They have denser housing clustered together with a wide variety of commercial and employment businesses to create a complete community. However, some have only one or two uses due to their size. All of them have been designated as transition areas within the Areas of Change because all or part of them could be redeveloped to better support the establishment of complete communities.

- Redevelop deteriorating single-family homes and sporadic commercial businesses to single-family attached or multifamily units to increase density where appropriate in the context of the existing neighborhood.
- Vacant industrial should be redeveloped to an entertainment use or small commercial retail center to better support residents.
- Overall, the County should prioritize higher-quality redevelopment of any primary or supporting land use for the Urban Residential placetype as opportunities arise.”

The higher density single family residential development proposed within District No. 1 pursuant to the previously approved Wilshire PUD (Planned Unit Development) supports the goals and objectives of the Priority Development area by locating “denser housing” within close proximity to a “wide variety of commercial” businesses that already exist along the Marksheffel Road corridor and which are also planned for development within District No. 2. By coordinating the siting of new residential development in close proximity to existing and proposed commercial development the proposed Project reinforces the concept of creating “complete communities.”

### **2. Compliance with Water Master Plan**

The property within the proposed Districts is located within Planning Region 5 of the Water Master Plan, pursuant to Figure 3-1 on page 25, which includes Cherokee Metropolitan District as the primary central water provider. Table 5-3 of the Plan identifies that Region 5 has a current demand of 4,396 acre-feet per year and a current supply of 13,607 acre-feet per year, which results in current excess water supplies in the amount of 453 acre-feet per year. Tables 5-4 and 5-5 projects Region 5 as not having excess water supplies at year 2040 and at full buildout (2060). However, the Water Master Plan was drafted and adopted prior to Cherokee Metropolitan District receiving approval of a water reuse plan from the Colorado Division of Water Resources, which effectively resolves many of Cherokee’s long term water supply issues. A Water Resources Report is not required with submittal of a special district service plan and, therefore, has not been provided. A finding of water sufficiency will be required at the subdivision stage of development.



3. Compliance with EPC Major Transportation Corridor Plan

The County's Major Transportation Corridor Plan does not identify any "2045 Roadway Improvements" for any of the roads located near the proposed development. The proposed development will be subject to the Countywide Traffic Impact Fee.

4. Compliance with EPC Parks Master Plan

The El Paso County Parks Master Plan (2022) does not depict any existing or planned parks in or around the proposed development. The Plan does show a proposed bicycle route along Marksheffel Road, which would be convenient to the future residents of the proposed development. Parks staff will have an opportunity to review the subsequent subdivision applications for compliance with the Parks Master Plan and either request dedication of land for parks or trails or payment of fees in lieu of land dedication.

5. Other Topical Elements of the County Master Plan

The proposed rezone is in compliance with the other topical elements of the County Master Plan, including the Master Plan for Mineral Extraction and the El Paso County Wildlife Habitat Maps and Descriptors.

**E. Service Plan Conformity**

The proposed Service Plan is in conformance with the County's Special District Policies as well as the statutory requirements for formation of a Title 32 Special District. The Service Plan provides all of the applicable information necessary for the Board of County Commissions to approve the Service Plan:

1. *There is sufficient existing and projected need for organized service in the area to be serviced by the proposed Districts;*

The Districts' purposes are to finance and construct certain public improvements and to provide additional services as necessary to support the Project. The Project is not presently served with the facilities and/or services proposed to be provided by the Districts, nor does the County nor any other special district have any plans to provide such services within a reasonable time and on a comparable basis. To develop the Project, a significant investment in public infrastructure is required, including, but not limited to water systems improvements, sanitary sewer and storm drainage improvements, street and roadway improvements, and parks and recreation improvements. The Districts' formation is therefore necessary to provide the most economic development of the public improvements required for the Project.

The projected need for organized services cannot be currently met via existing service providers in the area. District No.1 is in the Constitution Heights Metropolitan

District (“**Constitution Heights**”), however, District No. 2 is not. **Constitution Heights** recently adopted a Resolution and Order for Exclusion of the property proposed to be included within District No. 1 from its boundaries to allow for the Districts to undertake the public improvements and services necessary to support the planned residential and commercial development. Exclusion of the property proposed to be included within District No. 1 from Constitution Heights expressly indicates Constitution Heights’s inability and/or unwillingness to finance the necessary public improvements and provide ongoing services to the Districts. Therefore, based upon the planned land uses in the Wilshire Ranch development, there is projected need for the ability to finance the improvements and ongoing services being proposed within the Service Plan.

2. *The existing service in the area to be served by the proposed Districts is inadequate for present and projected needs;*

There are currently no private parties or other governmental entities, located in the immediate vicinity of the Districts that consider it desirable, feasible or practical to undertake the planning, design, acquisition, construction installation, relocation, redevelopment and financing of the public improvements needed for the Project. As mentioned above, Constitution Heights approved a Resolution and Order for Exclusion to exclude the land within the proposed District No. 1 from the adjacent Constitution Heights and the only other existing district in the immediate vicinity is the Central Marksheffel Metropolitan District (“**Central Marksheffel**”) which has satisfied all prior debt issuances and merely maintains a 5 mill operations and maintenance mill levy. Central Marksheffel does not desire to issue new debt for the propose of constructing public improvements within the Wilshire Ranch development which would have to be paid off by existing residents in the Central Marksheffel neighborhoods. It is reasonable to expect that such improvements should be the financial responsibility of the new residents and commercial land owners within the Wilshire Ranch development rather than that of existing residents residing in the neighboring Central Marksheffel Metropolitan District.

3. *The proposed Districts are capable of providing economical and sufficient service to the Project;*

The Districts will provide public improvements and services necessary for the Project and will ensure the public improvements are constructed in a reasonable and timely manner. The public improvements will be constructed for the use and benefit of all anticipated inhabitants, property owners and taxpayers of the Districts. Further, public financing tools available to the Districts will help lower the costs of the public improvements.

4. *The area to be included in the proposed Districts does have, and will have, the financial ability to discharge the proposed indebtedness on a reasonable basis;*

The estimated costs of the improvements and facilities to be constructed are set forth in the Service Plan. Based on these development assumptions and the financial assumptions contained in the Financial Plan for the Districts, the projected revenue is sufficient to allow the Districts to discharge the proposed indebtedness on a reasonable basis. The extension of Colorado Tech Drive will be completed prior to the recording of a final plat for 44 lot single family residential portion of District No. 1 commonly referred to as Wilshire Filing 3. The Sand Creek tributary channel improvements north of Colorado Tech Drive will be completed with the platting of the multi-family land adjacent to that part of the channel, and the Sand Creek tributary channel improvements south of Colorado Tech Drive will be completed with the earlier of the platting of the commercial parcels in District No. 2 or the residential adjacent to the channel south of Colorado Tech Drive.

The Board of County Commissioners may consider the following measures:

1. *Adequate service is not, and will not be, available to the area through the County or other existing municipal or quasi-municipal corporations, including existing special districts, within a reasonable time and on a comparable basis;*

The Project is not presently served with the facilities and services proposed to be provided by the Districts, nor does the County nor any other special district have any plans to provide such services within a reasonable time and on a comparable basis. While there is an underlying existing special district in the vicinity of the Project, known as the Constitution Heights Metropolitan District (previously defined herein as “**Constitution Heights**”), this district has already issued debt, therefore, it would not have the debt capacity to finance the design and construction of the additional public improvements included within the Project. For this reason, the developer has requested and received approval of exclusion of the property to be included in the proposed District No. 1 from Constitution Heights, which is supported by Constitution Heights because the subject property proposed to be included within District No. 1 will still be subject to the respective debt service mill levy of Constitution Heights until the issued debt is fully repaid. If the property proposed to be included within District No. 1 were to remain within the boundaries of Constitution Heights, it would not only continue to be subject to its debt service mill levies but would not have an opportunity to benefit from the issuance of such debt in a way that is consistent with the Developer’s timing and plans for development.

Cherokee has existing infrastructure on the property and has reserved water and wastewater treatment capacity to serve the development. The existing Cherokee facilities include a sewer main within the proposed Filing No.2 that will fully serve the lots therein and the lots in part of District No.1 as well another sewer main constructed for the 44 lot single family residential portion of Filing No. 1. In addition, the property included within the Districts is not currently contiguous with the municipal boundaries of the City of Colorado Springs. For these reasons, annexation into the City of Colorado Springs to obtain utility service from Colorado Springs Utilities is not reasonable.

2. *The facility and service standards of the proposed Districts are compatible with the facility and service standards of the County;*

All infrastructure that is financed, designed, and constructed by the Districts will be constructed in accordance with the County's standards and specifications as well as any other appropriate jurisdictions, including Cherokee's standards relative to water and wastewater infrastructure. Construction of the Sand Creek tributary channel improvements will increase the overall function and long-term stability of the channel with respect to velocities and stormwater quality impacts, which will be a benefit to all downstream properties adjacent to the channel and adjacent to the main stem of Sand Creek. Similarly, construction of the Colorado Tech Drive crossing from Marksheffel Road to the existing and planned residential development will provide permanent secondary access into the area, which is currently served by a permanent access to Constitution Avenue via Hannah Ridge Drive and a temporary secondary access to Palmer Park Boulevard via a local residential road known as Green Grass Court.

3. *The proposal is in substantial compliance with the County master plan;*

The Developer has reviewed the County's Master Plans and maintains the Project is compatible with the County's policies and desires for future sustainable growth. The County has already approved a PUD (Planned Unit Development) map amendment for the property to be included in the Districts, indicating substantial compliance with the County's master plan at the time of the approval. Additional master plan analysis of the Project's compatibility with the County's policies and desires for future sustainable growth will occur at the time of subsequent land use applications, including subdivision applications. Additional information about the proposal's compliance with the County's Master Plans is discussed in Section D above.

4. *The proposal is in compliance with any duly adopted county, regional, or state long-range water quality management plan for the area.*

The Developer anticipates Cherokee will provide water and sanitary sewer services to the Project following construction of the public improvements. Additional information about the proposal's compliance with the water quality management is discussed in Section D above.

5. *The creation of the proposed Districts is in the best interests of the area proposed to be served.*

The Project is not presently served with the facilities and/or services proposed to be provided by the Districts, nor does the County nor any other special district have any plans to provide such services within a reasonable time and on a comparable basis. Service from Constitution Heights is not practicable due to Constitution Heights inability to issue additional debt to finance the necessary public improvements within

the proposed Project. The Districts' formation is therefore necessary to provide the most economic development of the public improvements required for the Project.

### **Major Service Plan Points**

- Approximately 50.78 acres of property within the boundaries of the Districts
- Anticipated development of 44 single family detached dwelling units and 270 single family detached or attached dwelling units in District No. 1
- Anticipated development of 12 commercial pads on 9.7 acres with an estimated building main floor area of 55,000 square feet of commercial development within District No. 2
- Completion of an estimated \$16,219,688.38 (in 2025 dollars) of public improvements
- Requested debt authorization of \$20,000,000 to allow for inflation, contingencies, and unanticipated changes from the date of approval of the Districts' Service Plan.
- 30-year maximum period of maturity for issuance of any Debt (except for Developer Funding Agreements). The service plan and financial plan anticipates a subsequent refunding or restructuring of the initial Debt issuance, with a period of maturity for the refunding or restructured Debt no greater than thirty (30) years from the date of the issuance of the refunded or restricted Debt.
- Debt Service Mill Levy for the repayment of any and all Debt on a single property developed for residential purposes cannot exceed forty (40) years after the year of the initial imposition of such Debt Service Mill Levy unless a majority of the Board of Directors of the District imposing the Debt Service Mill Levy are residents of the District and have voted in favor of issuing Debt with a term which requires or contemplates the imposition of a Debt Service Mill Levy for a longer period of time
- Maximum Combined Mill Levy of 65 mills, consisting of a Maximum Debt Service Mill Levy of up to 50 mills, a Maximum Operational Mill Levy of up to 10 mills and a Maximum Special Purpose Mill Levy of up to 5 mills (all subject to the Maximum Combined Mill Levy of 65 mills)
- Public Improvements to be constructed to County and other applicable standards and specifications.
- An Annual Report and Disclosure Form will be submitted to the County regarding the District's activities, and filed with the Division of Local Government and the State Auditor
- District will perform covenant enforcement and maintenance of common facilities in the absence of an owners association, and any ongoing operation and maintenance of the public improvements within the Districts not otherwise dedicated to the County or third-party entities for ownership and/or ongoing operation and maintenance

## **F. Conclusion**

The Districts' organization is in the best interests of the future residents of the proposed service area. The Districts will ensure that construction of the public improvements occurs in a timely manner and in accordance with applicable standards. The Districts will further generate tax revenue sufficient to pay for the costs of those public improvements, services, maintenance, and operations.