

	<b>County Comments</b>	<b>Response</b>
1.	Provide further explanation of debt repayment period.	The example financial pro forma anticipates an initial bond issuance in 2021 with a 30 year term and then a refinance in 2031, which extends the term to 2061. Generally, the underwriting market favors this structure – the ability to have 40 years for repayment accommodates any significant drops in assessed valuation and other unknown circumstances. Any bonds the Districts issue will have 30 year terms with the ability to extend to 40 if necessary.
2.	Provide Schedule Numbers and Update acreage	Revised.
3.	Confirm Maximum Debt Authorization amount is correct.	The total estimate of public improvement costs is \$235,000,000 and therefore a maximum debt authorization of \$250,000,000 provides enough flexibility to address unknown circumstances, e.g., increased construction costs, inflation.
4.	Provide additional information in Article I and Section III.E regarding proposed ongoing services to the extent updated information is available, including adding drainage as proposed ongoing service in Article I, Executive Summary.	Revised.
5.	Revise Maximum Mill Levies and add details of residential vs. commercial.	Revised.
6.	Confirm no special purpose mill levy for covenant enforcement.	Confirmed.
7.	Identify residential districts vs. commercial districts	Revised Section III.D to explain that the Financing Districts will consist primarily of residential units and the commercial uses will be located in one or more of the Financing Districts.
8.	Add drainage and bridge to public improvements definition in Article II.	Revised.
9.	Add State to list of entities to which regional public improvements may be dedicated.	Revised.
10.	Add language in Section III.A that offsite improvements will benefit regional users.	Revised.
11.	Provide explanation for why five districts are needed and revise Section III.J.4 accordingly.	Revised Section III.B to add following language: the Districts will serve a large

		<p>project with significant infrastructure and phasing will require multiple districts to accommodate any delay in development and for a coordinated approach to infrastructure financing. It also allows bonding to be done in the most efficient manner by segregating the bonds to completed portions of the development instead of being forced to issue bonds early in the project.</p> <p>Revised Section III.D to provide additional explanation for the multiple district structure.</p> <p>Revised Section III.J.4 to similarly provide that the multiple district structure will support the phased development of the Project, as well as the fact that although the Financing Districts will consist primarily of residential units, the limited commercial development will be located in one or more of the Financing Districts.</p>
12.	Provide explanation of need for districts when the property was recently excluded from the 4-Way Ranch Metropolitan District No. 2.	Pursuant to the Resolution Approving the Exclusion of Property, the 4-Way Ranch Metropolitan District No. 2 determined that it could not and did not want to provide the necessary infrastructure for the development, which would have burdened the existing residents of the District with additional debt. Section III.B is revised to provide this explanation.
13.	Provide explanation of need for districts if Woodmen Hills is going to provide water and wastewater	The Grandview Reserve Districts will provide water and the Woodmen Hills District will provide sanitary treatment. Woodmen Hills is unwilling to finance and provide the collection system internal to the project. Section III.B is revised to provide this explanation.
14.	Add maintenance of parks, channels, and drainage to Section III.D.2.a.	Revised.
15.	Change the language of the first part of the last sentence in Section E.3 to read, “It is anticipated that most of the foregoing street improvements, except underground utilities, will be dedicated...”	Revised.

16.	Add language to III.E.4 to clarify that the Districts will need to maintain the drainageways and detention and water quality facilities unless the County develops a stormwater maintenance district, division, or other entity.	Revised.
17.	Clarify whether a fire station is being requested.	The dedication of land will be by the Developer, not the Districts. However, the Districts will have the power to provide fire hydrants and other fire protection facilities through their water powers in Section III.E.1 and 7.
18.	List the anticipated IGAs in Section III.I.	The only anticipated IGA currently is an inter-district IGA.
19.	Question regarding estimated population in Section IV.B.	2.5 persons is the standard multiplier used to estimate the population.
20.	Explain the absorption rate in Section IV.C.	The Development Summary in Exhibit B is revised to add the following explanation: Given current demand and shortfall within the County and Colorado Springs area, the absorption rate was deemed reasonable. The infrastructure and financing plans will be adjusted accordingly if there are delays in the build-out.
21.	Further explain status of land use approvals.	Revised to add that the sketch plan will be submitted prior to the Service Plan hearing.
22.	Provide justification that Sections XI.C, D, F, and G have been established.	The proposed services and improvements the Districts will provide are not available through the County or other existing municipalities or quasi-municipal corporations. The formation of the Districts will ensure that these services and improvements are constructed and provided within a reasonable period of time for the benefit of the property owners, taxpayers, and residents of the community at a level commensurate to the County's standards. The Developer is in the process of obtaining the necessary underlying land use approvals and will submit the Sketch Plan prior to the Public Hearing on the Service Plan. The Districts will only issue debt that the Districts can

		reasonably pay from the revenue derived from the debt service mill levy and other legally available revenue, as demonstrated in the Service Plan and the financial plan information provided in Exhibit D.
23.	Address the conflict between Section III.J.5.e and Section VI.D.	Revised so that the Districts must obtain the BOCC's approval prior to issuing debt with a maturity period greater than 30 years, which matches the El Paso County Special District Policy and the El Paso County Code.