

BEFORE THE CITY COMMISSION OF THE
CITY OF HAINES CITY, FLORIDA

IN RE: PETITION TO ESTABLISH THE)
 WHITE CLAY COMMUNITY)
 DEVELOPMENT DISTRICT)

AFFIDAVIT ADOPTING WRITTEN, PRE-FILED TESTIMONY

STATE OF FLORIDA
COUNTY OF ORANGE

I, Jillian Burns, being first duly sworn, do hereby state for my affidavit as follows:


1. I have personal knowledge of the matters set forth in this affidavit.
2. My name is Jillian Burns and I am a District Manager at Governmental Management Services-Central Florida, LLC.
3. The prepared written, pre-filed testimony consisting of twelve (12) pages, submitted under my name to the City Commission of the City of Haines City, Florida relating to the Petition to Establish the White Clay Community Development District and attached hereto, is true and correct.
4. If I were asked the questions contained in the pre-filed testimony orally at the White Clay Community Development District establishment hearing, my oral answers would be the same as the written answers presented in my pre-filed testimony.
5. My credentials, experience, and qualifications concerning my work as a special district manager and financial advisor are accurately set forth in my pre-filed testimony.

6. My pre-filed testimony addresses the various managerial and operational aspects related to the Petition to Establish the White Clay Community Development District.

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

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

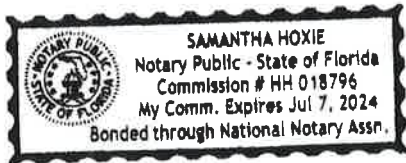
Executed this 21st day of December 2023.


Jillian Burns

STATE OF FLORIDA
COUNTY OF Orange

The foregoing instrument was acknowledged before me by means of physical presence or online notarization, this 21st of December 2023, by Jillian Burns, who is personally known to me or who has produced _____ as identification.


(Official Notary Signature & Seal)



Name: Samantha Hoxie
Personally Known α
OR Produced Identification _____
Type of Identification _____

1 **TESTIMONY OF JILLIAN BURNS FOR ESTABLISHMENT OF**
2 **WHITE CLAY COMMUNITY DEVELOPMENT DISTRICT**
3

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

6 My name is Jillian Burns. My business address is 219 E. Livingston St.
7 Orlando, Florida 32801.
8

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

11 I am employed with Governmental Management Services-Central Florida, LLC (“GMS”)
12 and serve as District Manager and assessment administrator for community development
13 districts.
14

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

17 GMS provides management consulting services to community development districts and
18 the real estate industry, including general management, accounting, recording, secretarial
19 services, field services and assessment administration. GMS currently serves as the
20 district manager for over one hundred and fifty (150) community development districts
21 (“CDDs”) in the State of Florida.
22

23 **4. Do you work with both public and private sector clients?**
24

25 GMS primarily works for public entities providing district management services.
26 However, we are retained, from time to time, by private entities to consult on the creation
27 of special districts as well as the viability of certain proposed developments.
28

29 **5. Prior to your current employment, by whom were you employed and what were your**
30 **responsibilities in those positions?**
31

32 I have fifteen (15) years of experience in providing management to special districts in the
33 State of Florida. I worked for Fishkind & Associates as a District Manager for over 10
34 years prior to my employment at GMS. I have extensive knowledge of special districts,
35 governmental budgeting and finance issues, and the development process.
36

37 **6. Please describe your educational background.**
38

39 I have a bachelor’s degree from University of Central Florida.
40

41 **7. Please describe your work with community development districts in Florida.**
42

43 Through GMS, the clients I serve are both resident-elected and landowner-elected CDDs,
44 depending on the stage in the life of the development. I assist the various Boards of
45 Supervisors and residents by managing the accounting, official recordkeeping, and

1 operations and management of the assets acquired or constructed by the CDD. I have
2 provided management services to over forty (40) active CDDs across Florida.

3
4 **8. Are any of these community development districts that you have worked with about**
5 **the same size as the proposed District in the City of Haines City, Florida (the “City”)?**

6
7 Yes.

8
9 **9. What has been your role with respect to the proposed District establishment**
10 **proceeding?**

11
12 I serve as a financial, economic, and management consultant relating to the establishment
13 of the proposed District. Specifically, my firm prepared Exhibit 8, the Statement of
14 Estimated Regulatory Costs (“SERC”), of the Petition to Establish the Proposed District
15 (“Petition”).

16
17 **DISTRICT MANAGEMENT**

18
19 **10. At this point, I will ask you to address certain matters that are related to community**
20 **development district management. Please describe the general manner in which a**
21 **community development district actually operates.**

22
23 Community development districts are governed by a five-member board of supervisors.
24 These board members are initially appointed by the establishment entity in its ordinance.
25 Within 90 days of the establishment of the district, a new board is elected by the landowners
26 in the district. The Board is the governing body of the district. The Board employs a
27 district manager, who supervises the district’s services, facilities, and administrative
28 functions. The Board annually considers and, after public notice and hearing, adopts a
29 budget. The district submits a copy of the proposed budget to the applicable local general-
30 purpose government for review and for optional comment prior to its adoption each year.

31
32 **11. Are there requirements, such as the open meetings and public records laws, imposed**
33 **upon community development districts in order to safeguard the public that are**
34 **similar to those imposed upon other general-purpose local governments?**

35
36 Yes, there are.

37
38 **12. Please describe these requirements and safeguards.**

39
40 First, it is important to note that the establishment of a CDD does not change any
41 requirements for local general-purpose governmental approval of construction within the
42 district. Any land development requirements and all state and local development
43 regulations still apply.

44
45 Second, members of a CDD Board of Supervisors must be residents of Florida and citizens
46 of the United States. After the Board shifts to being elected by the resident electors of the

1 CDD, the Supervisors must also be residents and electors of the CDD. Supervisors must
2 annually file the same financial disclosure forms required by other local officials. All
3 meetings of the CDD Board of Supervisors are open to the public and are subject to the
4 government in the sunshine requirements of Chapter 286, Florida Statutes. Furthermore, a
5 CDD's records must be open for public inspection in accordance with the Florida law
6 governing public records.
7

8 Next, the District must provide financial reports to the state in the same form and manner
9 as is required of all other political subdivisions. The District is annually audited by an
10 independent certified public accountant. As I said before, the District budget is adopted
11 annually by the board after a public hearing. All rates, fees, and charges imposed by the
12 District must be adopted pursuant to Chapter 120, Florida Statutes.
13

14 Finally, to impose special or non-ad valorem assessments under Chapter 170, 190 and 197,
15 Florida Statutes, a CDD must provide published and mailed notice to those who are
16 assessed providing them opportunity to appear before the Board of Supervisors and have
17 an opportunity to comment on the advisability of the assessments. That assessment process
18 entails preparation of an assessment methodology that fairly and equitably allocates the
19 cost of the CDD's projects.
20

21 **13. Please describe in general terms how a CDD operates financially, both on a day-to-**
22 **day and a long-term basis.**
23

24 In the early stages, particularly when a CDD is first formed, the CDD's operating funds
25 may be funded by a "Funding Agreement" between the CDD and the landowner/developer
26 in lieu of assessments that the CDD might have imposed on property within the CDD.
27

28 In order to provide long term financing of capital projects, CDDs often issue bonds. All
29 bonds issued by CDDs must be secured by a trust agreement, and any bond maturing over
30 a period of more than five years must be validated and confirmed by court decree pursuant
31 to Chapter 75, Florida Statutes. A CDD may borrow funds on a long or short-term basis.
32

33 Debt may be retired by the District through non ad valorem or special assessments imposed
34 on benefited properties, or rates, fees, and charges imposed on users of district facilities
35 and services. By law, debt of the District cannot become debt of any other government
36 (city, county or state), without that government's consent.
37

38 **14. What alternatives, other than community development districts, are you familiar with**
39 **that might be available to provide community infrastructure for the lands within the**
40 **proposed District?**
41

42 In my opinion there are two alternatives that might provide community infrastructure such
43 as the roads, utilities, drainage, recreation and other improvements contemplated for the
44 proposed district. First, the general-purpose local government could finance the
45 improvements utilizing special assessments and/or general funds. Alternatively, the
46 developer could provide infrastructure through private means, including private financing

1 if available. As discussed later in my testimony, neither of these alternatives is preferable
2 to use of the CDD concept.
3

4 **15. Do you have an opinion, as someone experienced in district management and**
5 **operations, as to whether the proposed District is the best available alternative for**
6 **delivering community services and facilities to the areas that will be served by the**
7 **District?**
8

9 Yes. For this project, the proposed District is the best alternative available for delivering
10 the proposed services and facilities to the area that will be served. These improvements
11 include, but are not limited to, sanitary sewer collection, water distribution, reuse water,
12 stormwater management system, landscaping, roadways, and other public improvements.
13

14 **16. What is the basis for your opinion?**
15

16 Looking at the alternatives, the City could finance and manage the improvements utilizing
17 special assessments or general funds. The developer and/or a property owner's association
18 ("POA") could provide these facilities as well through private financing.
19

20 In evaluating the alternatives, it is important to consider whether the alternative can provide
21 the best focus, can effectively and efficiently manage and maintain the facilities, and
22 whether the alternative can secure low cost, long term public financing. The City clearly
23 provides the long-term perspective and is a stable and relatively low-cost source of
24 financing and provider of services at sustained levels. However, the City has substantial
25 demands over a broad geographical area that places a heavy management delivery load on
26 its staff. In addition, if dependent district financing were used, the City would be
27 responsible for all administrative aspects of the dependent district. The City would have
28 to make time and meetings available for the monthly matters pertaining to the dependent
29 district. By using a dependent district mechanism, the City would be increasing its
30 responsibility and hence liability for the variety of actions that will take place in the
31 development. The City, through the dependent district, would also be the contracting party
32 for all construction contracts, would have to deal with bid issues, enforce performance
33 bonds, and participate in construction arbitration or litigation if necessary. They would
34 deal with delay claims and budget management and all the other challenges that come with
35 being the owner in a public construction project. A CDD can be created to provide focused
36 attention to a specific area in a cost-effective manner. It also allows the City to focus staff
37 time, finances, and other resources elsewhere and does not burden the general body of
38 taxpayers in the City with the debt associated with this growth.
39

40 The other alternative is the use of private means, either through a POA or through the
41 developer, or both in combination. This combination can clearly satisfy the high demand
42 for focused service and facilities and managed delivery. However, only a public entity can
43 assure a long-term perspective, act as a stable provider of services and facilities, qualify as
44 a lower cost source of financing, and pay for services at sustained levels. POAs lack the
45 ability to effectively finance the improvements. Their ability to assure adequate funds for
46 sustained high levels of maintenance is less than with a CDD.

1
2 Furthermore, neither the developer nor a POA would be required to conduct all actions
3 relating to the provision of these improvements in the “sunshine” as a CDD must or abide
4 by other public access requirements that are incumbent upon a CDD and its Board of
5 Supervisors. Also, provision and long-term operation and maintenance of these
6 improvements, particularly the drainage activities, by a CDD ensures that residents have
7 guaranteed access to the body or entity making decisions about these facilities, and in fact
8 will one day sit as the five-member board making the decisions that impact their
9 community directly.

10
11 A CDD is an independent special purpose unit of local government designed to focus its
12 attention on providing the best long-term service to its specifically benefited properties and
13 residents. It has limited power and a limited area of jurisdiction. The District will be
14 governed by its own board and managed by those whose sole purpose is to provide the
15 District long term planning, management, and financing of these services and facilities.
16 This long-term management capability extends to the operation and maintenance of the
17 facilities owned by the District. Further, the sources for funding and manner of collection
18 of funds will assure that the District facilities will be managed at the sustained levels of
19 quality desired by residents well into the future.

20
21 **17. Do you have an opinion, as someone experienced in district management and**
22 **operations, as to whether the area of land to be included within the proposed District**
23 **is of sufficient size, is sufficiently compact, and is sufficiently contiguous to be**
24 **developable as one functional interrelated community?**

25
26 Yes.

27
28 **18. What is your opinion?**

29
30 The proposed District has sufficient land area, and is sufficiently compact and contiguous
31 to be developed, with the roadway, drainage, water and sewer, and other infrastructure
32 systems, facilities and services contemplated. The District will operate as one functionally
33 interrelated community.

34
35 **19. What is the basis for your opinion?**

36
37 The size of the proposed District is approximately 181 acres. Based on my previous
38 experience, the proposed District is of sufficient size, compactness, and contiguity to be
39 developed as a functional interrelated community.

40
41 The qualities of compactness, contiguity, and size relate directly to whether an area can
42 become one functional interrelated community. From the standpoint of the provision,
43 management and operation of the community infrastructure expected to be provided by the
44 District, the acres contemplated for inclusion within the District is sufficiently compact,
45 contiguous and of sufficient size to maximize the successful delivery of these infrastructure
46 improvements to these lands. The delivery of services and facilities to the lands within the

1 District will not be hampered by insurmountable barriers or spatial problems. The area
2 within the District is suitably configured to maximize the benefits available from the
3 District services and facilities to be provided.
4

5 **20. Do you have an opinion, as someone experienced in district management and**
6 **operations, as to whether the area that will be served by the proposed District is**
7 **amenable to separate special district government?**
8

9 Yes.

10
11 **21. What is your opinion?**
12

13 The District is of sufficient size, compactness, and contiguity. Therefore, the area to be
14 served by the proposed District is clearly amenable to separate special district governance.
15 The configuration of the District is not unlike other CDDs with which I have worked over
16 time.
17

18 **22. What is the basis for your opinion?**
19

20 Two criteria are needed to evaluate if a land area is amenable to separate special district
21 government. One, does the land area have need for the facilities and services and will its
22 owners and residents benefit from facilities that the special district could provide? Two, is
23 the land area of sufficient size, sufficient compactness, and sufficiently contiguous to be
24 the basis for a functional interrelated community?
25

26 Under both criteria, the proposed District is a planned community of sufficient size with a
27 need for the facilities and improvements that are presently expected to be provided by the
28 proposed District. As described in the petition, the proposed District will construct and
29 maintain certain identified needed facilities and services. Other facilities and improvements
30 will be constructed by the proposed District and ultimately owned and maintained by the
31 City. Based on my experience, CDDs of this size are large enough to effectively provide
32 and manage services. From a management and operations perspective, the land area is well
33 suited to the provision of the proposed services and facilities.
34

35 **23. Do you have an opinion, as someone experienced in district management and**
36 **operations, as to whether the community development services and facilities of the**
37 **proposed District will be incompatible with the capacity and use of existing local and**
38 **regional community development services and facilities?**
39

40 Yes.

41
42 **24. What is your opinion?**
43

44 The proposed services and facilities of the proposed District are not incompatible with the
45 capacity and uses of existing local or regional community development services and
46 facilities.

1
2
3 **25. What is the basis for your opinion?**
4

5 Petitioner presently expects the proposed District to finance and construct certain sanitary
6 sewer collection systems, water distribution systems, reuse water systems, stormwater
7 management systems, and roadway improvements. None of the facilities expected to be
8 provided by the District presently exist. Ultimately, a district may own and maintain
9 certain of those improvements and the City, or other governmental entities, may own and
10 maintain others. There will be no overlap or incompatibility because the facilities and
11 improvements expected to be provided by the proposed District do not exist today.
12

13
14 **ECONOMICS AND FINANCING**
15

16 **26. You stated earlier that you are you familiar with the Petition, and its Exhibits, filed**
17 **by the Petitioner, to establish the proposed District. Are you particularly familiar**
18 **with Exhibit 8 to the Petition?**
19

20 Yes, Exhibit 8 is the SERC, a requirement of Chapter 190, Florida Statutes.
21

22 **27. What exactly is a "SERC"?**
23

24 The Statement of Estimated Regulatory Costs is actually a requirement under Section
25 120.541(2), *Florida Statutes*, which has been incorporated into the law on establishment
26 of community development districts.
27

28 **28. In general terms, please summarize the economic analyses presented in the SERC.**
29

30 An understanding of the SERC requires the recognition of the scope of review and
31 evaluation for the establishment of a community development district as set out in Chapter
32 190. Section 190.002(2)(d), *Florida Statutes*, states “[t]hat the process of establishing such
33 a district pursuant to uniform general law [must] be fair and based only on factors material
34 to managing and financing the service-delivery function of the district, so that any matter
35 concerning permitting or planning of the development is not material or relevant.” Thus,
36 the scope of the economic analysis included in the SERC addresses only the establishment
37 of the proposed District, and not the planning or development of the property itself.
38

39 The economic analysis sets out the assumptions about the development within the proposed
40 district and the anticipated infrastructure to be provided by it. The analysis addresses each
41 of the potentially affected parties defined in Chapter 120, Florida Statutes, and evaluates
42 the impact of the proposed district on each such group.
43

44 The proposed District is a specialized unit of local government. It is a special purpose unit
45 of local government with a single objective: the provision of infrastructure and services for
46 a planned new community. Its economic benefits exceed its economic cost to the

1 Petitioner, the City, and to all subsequent purchasers and landowners of the community -
2 in short, to all affected parties.

3
4 Once the proposed District is established, there are no direct costs to the City. While the
5 proposed District will provide certain reports and budgets to the City for its discretionary
6 review, there are no requirements that either incur any obligations or expense associated
7 with its review. In addition, to the extent the proposed District utilizes the services of the
8 Property Appraiser or Tax Collector under the provisions of Chapter 197, Florida Statutes,
9 to collect its assessments, the proposed District must pay the costs associated with those
10 services.

11
12 It is important to note that under Chapter 190, Florida Statutes, the debt of the proposed
13 District cannot become the debt of the City or the State of Florida. Since the proposed
14 District will be an independent unit of government and issue its own bonds, the proposed
15 District will not have any effect on the bonding capacity of the City or the State of Florida.

16
17 **29. Please describe briefly the data and methodology used in preparing the SERC and**
18 **related analyses.**

19
20 The data for the analysis came from the landowner, other experts working on the Petition,
21 and from the Petition itself. The methodology utilized is the standard economic impact
22 assessment.

23
24 **30. From an economic and financial perspective, do you have an opinion regarding the**
25 **financial viability and feasibility of the proposed District?**

26
27 Yes, I do.

28
29 **31. What is that opinion?**

30
31 In my opinion, based on my experience with other districts, the proposed District is
32 expected to be financially viable and feasible.

33
34 **32. Are you familiar with the State Comprehensive Plan found in Chapter 187, Florida**
35 **Statutes?**

36
37 Yes.

38
39 **33. From an economic and financial perspective, do you have an opinion as to whether**
40 **the proposed District is inconsistent with the State Comprehensive Plan from an**
41 **economic perspective?**

42
43 Yes.

44
45 **34. What is that opinion?**
46

1 It is my opinion the proposed District is not inconsistent with any applicable element or
2 portion of the state comprehensive plan.
3

4 **35. What is the basis for your opinion?**
5

6 I have reviewed, from an economic and financial perspective, the State Comprehensive
7 Plan, particularly those portions that relate to community development districts. The State
8 of Florida Comprehensive Plan (Chapter 187, Florida Statutes) “provides long-range
9 policy guidance for the orderly social, economic, and physical growth of the state.” From
10 an economic and financial perspective, four subjects, subjects 15, 17, 20, and 25 of the
11 State Comprehensive Plan are relevant to the establishment of a CDD.
12

13 Subject 15, titled Land Use, recognizes the importance of locating development in areas
14 that have the fiscal abilities and service capacity to accommodate growth. It is relevant
15 because CDDs are designed to provide infrastructure services and facilities in a fiscally
16 responsible manner to the areas that can accommodate development. The establishment of
17 the District will not be inconsistent with this goal because the District will have the fiscal
18 capability to provide the specified services and facilities within its boundaries.
19

20 Subject 17, titled Public Facilities, relates to (i) protecting investments in existing public
21 facilities; (ii) providing financing for new facilities, (iii) allocating the costs of new public
22 facilities on the basis of the benefits received by future residents; (iv) implementing
23 innovative but fiscally sound techniques for financing public facilities; and (v) identifying
24 and using stable revenue sources for financing public facilities. The establishment of the
25 District will further these State Comprehensive Plan Goals and Policies.
26

27 Subject 20, titled Governmental Efficiency, provides that governments shall economically
28 and efficiently provide the amount and quality of services required by the public. The
29 proposed District will be consistent with this element because the proposed District will
30 continue to:
31

- 32 (i) cooperate with other levels of Florida government;
- 33
- 34 (ii) be established under uniform general law standards as specified in Chapter
35 190, Florida Statutes;
- 36
- 37 (iii) be professionally managed, financed, and governed by those whose
38 property directly receives the benefits;
- 39
- 40 (iv) not burden the general taxpayer with costs for services or facilities inside
41 the proposed District; and
- 42
- 43 (v) plan and implement cost efficient solutions for the required public
44 infrastructure and assure delivery of selected services to residents.
45

46 Subject 25, titled Plan Implementation, calls for systematic planning capabilities to be
47 integrated into all levels of government throughout the state, with particular emphasis on

1 improving intergovernmental coordination and maximizing citizen involvement. The
2 proposed District is consistent with this element of the State Comprehensive Plan.

3
4 **36. Based on your work with districts and from an economic and financial perspective,**
5 **do you have an opinion as to whether the area of land that is proposed to be included**
6 **within the proposed District is of sufficient size, sufficient compactness, and sufficient**
7 **contiguity to be developable as one functional interrelated community?**

8
9 Yes.

10
11 **37. What is your opinion?**

12
13 Based on my previous experience, the proposed District is of sufficient size, compactness,
14 and contiguity to be developed as a functional interrelated community.

15
16 **38. What is the basis for your opinion?**

17
18 The project is compact with land use typical of a planned community. The development
19 of the land has been planned to be a functional interrelated community making the most
20 efficient use of public funds available.

21
22 **39. From a financial perspective, do you have an opinion as to whether the proposed**
23 **District is the best alternative available for providing the proposed community**
24 **development services and facilities to the area to be served?**

25
26 Yes.

27
28 **40. What is your opinion?**

29
30 The proposed District is the best alternative to provide community development facilities
31 to the area to be served. This is true for the landowners and the governmental entities for
32 the following reasons.

33
34 From the perspective of current and future property owners within the District, the District
35 is the best alternative for providing community facilities, infrastructure, and services. The
36 land development envisioned for the area within the District's boundaries will require
37 substantial provision of infrastructure, facilities and services. The CDD is an alternative
38 method to provide these necessary services. The CDD can access the tax-exempt public
39 capital markets and thereby fund these facilities and services at a lower cost than the
40 alternative of developer funding. Furthermore, unlike a POA, the CDD has the power to
41 assess property and collect those assessments along with other property taxes. Therefore,
42 a CDD can fund large capital improvement programs that a POA cannot.

43
44 With regard to the operations and maintenance of community facilities and services, the
45 CDD is also the best alternative. The CDD is preferable to a POA to future landowners for
46 the following reasons. First, unlike a POA, the CDD collects funds for operations and

1 maintenance directly from assessments collected along with all other property taxes, which
2 is a more assured income stream. Unlike a POA, a CDD is a unit of local government,
3 and it must hold its meetings in the sunshine and bid out its contracts where required by
4 law. A CDD provides control to the landowners much sooner in time than a POA. A CDD
5 is focused on providing the community with services, facilities, and their maintenance in a
6 way the general-purpose government, with its competing interests and broad
7 responsibilities, is not. This level of local control serves the best interests of property
8 owners in the CDD.

9
10 From the perspective of the State of Florida, the City, and the water management districts,
11 a CDD is the best alternative for providing community facilities and their operations and
12 maintenance for a variety of reasons. First, as noted above, compared to a POA the CDD
13 is a more powerful and more responsive organization for providing and maintaining
14 infrastructure and services. Second, without a CDD the City may have to assume greater
15 responsibility for construction, operations, and maintenance of community facilities and
16 services. Even if the City formed a dependent district to provide community facilities and
17 services to the area to be served by the CDD, and charged appropriately for these services,
18 the City would be enmeshed in the responsibilities and in the management of those
19 facilities. Furthermore, without a CDD the City cannot be assured that only residents of the
20 area to be served by the CDD would bear the full costs of the needed facilities and services.

21
22 **41. From an economic and financial perspective, do you have an opinion as to whether**
23 **the services and facilities to be provided by the proposed District will be incompatible**
24 **with the uses and existing local and regional facilities and services?**

25
26 Yes.

27
28 **42. What is your opinion?**

29
30 The proposed District covers approximately 181 acres of land. The configuration of the
31 land is sufficiently compact and contiguous. As such, it will not create any economic
32 disincentives to the provision of the infrastructure facilities contemplated in this case.

33
34 Given the scope and expected cost of facilities to be provided, 181 acres for a residential
35 development provides a sufficient economic base to absorb the debt costs and annual
36 operating costs for district administration and to efficiently apportion the cost of
37 improvements.

38
39 **43. From an economic and financial perspective, do you have an opinion as to whether**
40 **the area that will be served by the proposed District is amenable to separate special**
41 **district government?**

42
43 Yes.

44
45 **44. What is your opinion and its basis?**
46

1 It is my opinion that the area within the boundaries of the proposed District is amendable
2 to a separate special district government. The lands within the proposed District's
3 boundaries have the need for basic infrastructure.

4
5 The land is of sufficient size, compactness, and contiguity and meets those tests. Therefore,
6 from an economic and financial perspective, the area to be served by the proposed District
7 is clearly amendable to separate special district governance.

8
9 **45. Does this conclude your testimony?**

10
11 Yes, it does.