

IN RE: PETITION TO ESTABLISH
THE GARDNER TRAILS
COMMUNITY DEVELOPMENT DISTRICT

STATE OF FLORIDA
COUNTY OF Polk

1. I have personal knowledge of the matters set forth in this affidavit.
2. My name is Jason Greenwood, and I am Managing Director and District
er of Governmental Management Services-Tampa, LLC.

4. If I were asked the questions contained in the pre-filed testimony orally at The Gardner Trails 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 Gardner Trails 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 29th day of December 2025.



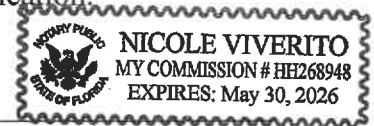
Jason Greenwood

STATE OF FLORIDA
COUNTY OF Polk

The foregoing instrument was acknowledged before me by means of ☒ physical presence or ☐ online notarization, this 29th of December 2025, by Jason Greenwood, who is personally known to me or who has produced _____ as identification.



(Official Notary Signature & Seal)



Name: Nicole Viverito
Personally Known ☒
OR Produced Identification _____
Type of Identification _____

**TESTIMONY OF JASON GREENWOOD FOR THE
THE GARDNER TRAILS COMMUNITY DEVELOPMENT DISTRICT
ESTABLISHMENT**

1. Please state your name and business address.

My name is Jason Greenwood. My business address is 4530 Eagle Falls Place, Tampa Florida 33619

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

I am the Managing Director of Governmental Management Services – Tampa, LLC (“GMS”), and serve as District Manager and assessment administrator for community development districts.

3. Please briefly summarize your duties and responsibilities.

GMS provides management consulting services to community development districts and the real estate industry, including general management, accounting, recording, secretarial services, field services and assessment administration. GMS currently serves as the district manager for over two hundred and fifty (250) community development districts (“CDDs”) in the State of Florida.

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

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

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

I have 8 years of experience in providing management to special districts in the State of Florida. I have extensive knowledge of special districts, governmental budgeting and finance issues, and the development process.

6. Will your firm, Governmental Management Services – Tampa, LLC, represent The Gardner Trails Community Development District (“District”)?

Yes. GMS will serve as District Manager and assessment administrator.

7. Please describe your educational background.

I have a B.A. in Business and Finance, and Marketing Minor from Ashford University in 2013 and an MBA with a specialization in Finance from Lynn University in 2015.

1 **8. Please describe your work with community development districts in Florida.**

2
3 Through GMS, the clients I serve are both resident-elected and landowner-elected CDDs,
4 depending on the stage in the life of the development. I assist the various Boards of
5 Supervisors and residents by managing the accounting, official recordkeeping, and
6 operations and management of the assets acquired or constructed by the CDD. I have
7 provided management and assessment administration services to numerous active CDDs
8 across Florida.
9

10 **9. Are any of these community development districts that you have worked with about**
11 **the same size as the proposed The Gardner Trails Community Development District**
12 **in Polk County, Florida (“County”)?**
13

14 Yes.
15

16 **10. What has been your role with respect to the proposed The Gardner Trails**
17 **Community Development District establishment proceeding?**
18

19 I serve as an assessment, economic, and management consultant relating to the
20 establishment of the proposed District. Specifically, I assisted in preparation of Petition
21 Exhibit 7, the Statement of Estimated Regulatory Costs (“SERC”).
22

23 **DISTRICT MANAGEMENT**
24

25 **11. At this point, I will ask you to address certain matters that are related to community**
26 **development district management. Please describe the general manner in which a**
27 **community development district actually operates.**
28

29 Community development districts are governed by a five-member board of supervisors.
30 These board members are initially appointed by the establishment entity in its ordinance.
31 Within 90 days of the establishment of the district, a new board is elected by the landowners
32 in the district. The Board is the governing body of the district. The Board employs a
33 district manager, who supervises the district’s services, facilities, and administrative
34 functions. The Board annually considers and, after public notice and hearing, adopts a
35 budget. The district submits a copy of the proposed budget to the applicable local general-
36 purpose government for review and for optional comment prior to its adoption each year.
37

38 **12. Are there requirements, such as the open meetings and public records laws, imposed**
39 **upon community development districts in order to safeguard the public that are**
40 **similar to those imposed upon other general purpose local governments?**
41

42 Yes, there are.
43

44 **13. Please describe these requirements and safeguards.**
45

46 First, it is important to note that the establishment of a CDD does not change any

1 requirements for local general purpose governmental approval of construction within the
2 district. Any land development requirements and all state and local development
3 regulations still apply.
4

5 Second, members of the CDD Board of Supervisors must be residents of Florida and
6 citizens of the United States. After the Board shifts to being elected by the resident electors
7 of the district the supervisors must also be residents and electors of the district. Board
8 members must annually file the same financial disclosure forms required by other local
9 officials. All meetings of the CDD Board of Supervisors are open to the public and are
10 subject to the government in the sunshine requirements of Chapter 286, *Florida Statutes*.
11 Furthermore, the District's records must be open for public inspection in accordance with
12 the Florida law governing public records.
13

14 Next, the District must provide financial reports to the state in the same form and manner
15 as is required of all other political subdivisions. The CDD is annually audited by an
16 independent certified public accountant. As I said before, the CDD budget is adopted
17 annually by the board after a public hearing. All rates, fees, and charges imposed by the
18 district must be adopted pursuant to Chapter 120, *Florida Statutes*.
19

20 Finally, to impose special or non-ad valorem assessments under Chapter 170, 190 and 197,
21 *Florida Statutes*, a CDD must provide published and mailed notice to those who are
22 assessed providing them opportunity to appear before the Board of Supervisors and have
23 an opportunity to comment on the advisability of the assessments. That assessment process
24 entails preparation of an assessment methodology that fairly and equitably allocates the
25 cost of the district's projects.
26

27 **14. Please describe in general terms how a CDD operates financially, both on a day-to-**
28 **day and a long-term basis.**
29

30 In the early stages, particularly when a CDD is first formed, the CDD's operating funds
31 may be funded by a "funding agreement" between the CDD and the landowner/developer
32 in lieu of assessments that the CDD might have imposed on property within the CDD.
33

34 In order to provide long term financing of capital projects, CDDs often issue bonds. All
35 bonds issued by CDDs must be secured by a trust agreement, and any bond maturing over
36 a period of more than five years must be validated and confirmed by court decree pursuant
37 to Chapter 75, *Florida Statutes*. The District also may borrow funds on a long or short-
38 term basis.
39

40 Debt may be retired by the District through non ad valorem or special assessments imposed
41 on benefited properties, or rates, fees, and charges imposed on users of district facilities
42 and services. By law, debt of the District cannot become debt of any other government
43 (County, county or state), without that government's consent.
44

45 **15. What alternatives, other than community development districts, are you familiar with**
46 **that might be available to provide community infrastructure for the lands within the**

1 **proposed District?**
2

3 In my opinion, there are two alternatives that might provide community infrastructure such
4 as the roads, utilities, drainage, recreation and other improvements contemplated for the
5 proposed district. First, the general-purpose local government could finance the
6 improvements utilizing special assessments and/or general funds. Alternatively, the
7 developer could provide infrastructure through private means, including private financing
8 if available. As discussed later in my testimony, neither of these alternatives is preferable
9 to use of the CDD concept.
10

11 **16. What has been your role with respect to the Petition to Establish The Gardner Trails**
12 **Community Development District (“Petition”)?**
13

14 I have worked closely with Prince Poinciana, LLC, (“Petitioner”) and its consultants in
15 determining if a CDD is appropriate for this project. I also supervised the preparation of
16 Exhibit 7 of the Petition, the SERC.
17

18 **17. Do you have an opinion, as someone experienced in district management and**
19 **operations, as to whether the proposed District is the best available alternative for**
20 **delivering community services and facilities to the areas that will be served by the**
21 **District?**
22

23 Yes. For this project, the proposed District is the best alternative available for delivering
24 the proposed services and facilities to the area that will be served. These improvements
25 include, but are not limited to, a stormwater management system, onsite roadway
26 improvements, a water distribution system, a sanitary collection and conveyance system,
27 landscape, hardscape, and recreation facilities.
28

29 **18. What is the basis for your opinion?**
30

31 Looking at the alternatives, the County could finance and manage the improvements
32 utilizing special assessments or general funds. The developer and/or a property owner’s
33 association (“POA”) could provide these facilities as well through private financing.
34

35 In evaluating the alternatives, it is important to consider whether the alternative can provide
36 the best focus, can effectively and efficiently manage and maintain the facilities, and
37 whether the alternative can secure low cost, long term public financing. The County clearly
38 provides the long-term perspective and is a stable and relatively low cost source of
39 financing and provider of services at sustained levels. However, the County has substantial
40 demands over a broad geographical area that places a heavy management delivery load on
41 its staff. In addition, if dependent district financing were used, the County would be
42 responsible for all administrative aspects of the dependent district. The County would have
43 to make time and meetings available for the monthly matters pertaining to the dependent
44 district. By using a dependent district mechanism, the County would be increasing its
45 responsibility and hence liability for the variety of actions that will take place in the
46 development. The County, through the dependent district, would also be the contracting

1 party for all construction contracts, would have to deal with bid issues, enforce
2 performance bonds, and participate in construction arbitration or litigation if necessary.
3 They would deal with delay claims and budget management and all the other challenges
4 that come with being the owner in a public construction project. A district can be created
5 to provide focused attention to a specific area in a cost-effective manner. It also allows the
6 County to focus staff time, finances, and other resources elsewhere and does not burden
7 the general body of taxpayers in the County with the debt associated with this growth.
8

9 The other alternative is the use of private means either through a POA or through the
10 developer, or both in combination. This combination can clearly satisfy the high demand
11 for focused service and facilities and managed delivery. However, only a public entity can
12 assure a long-term perspective, act as a stable provider of services and facilities, qualify as
13 a lower cost source of financing, and pay for services at sustained levels. POAs lack the
14 ability to effectively finance the improvements. Their ability to assure adequate funds for
15 sustained high levels of maintenance is less than with a CDD.
16

17 Furthermore, neither the developer nor a POA would be required to conduct all actions
18 relating to the provision of these improvements in the “sunshine” as a CDD must, or abide
19 by other public access requirements that are incumbent upon a CDD and its Board of
20 Supervisors. Also, provision and long term operation and maintenance of these
21 improvements, particularly the recreation roadway and drainage activities, by a CDD
22 ensures that residents have guaranteed access to the body or entity making decisions about
23 these facilities, and in fact will one day sit as the five member board making the decisions
24 that impact their community directly.
25

26 A CDD is an independent special purpose unit of local government designed to focus its
27 attention on providing the best long-term service to its specifically benefited properties and
28 residents. It has limited power and a limited area of jurisdiction. The CDD will be
29 governed by its own board and managed by those whose sole purpose is to provide the
30 district long term planning, management, and financing of these services and facilities.
31 This long-term management capability extends to the operation and maintenance of the
32 facilities owned by the CDD. Further, the sources for funding and manner of collection of
33 funds will assure that the CDD facilities will be managed at the sustained levels of quality
34 desired by residents well into the future.
35

36 **19. Do you have an opinion, as someone experienced in district management and**
37 **operations, as to whether the area of land to be included within the proposed District**
38 **is of sufficient size, is sufficiently compact, and is sufficiently contiguous to be**
39 **developable as one functional interrelated community?**
40

41 Yes.

42
43 **20. What is your opinion?**
44

45 The proposed CDD has sufficient land area, and is sufficiently compact and contiguous to
46 be developed, with the roadway, drainage, water and sewer, and other infrastructure

1 systems, facilities and services contemplated. The District will operate as one functionally
2 interrelated community.

3
4 **21. What is the basis for your opinion?**

5
6 The size of the proposed District is approximately 160.278 acres, more or less. Based on
7 my previous experience, the proposed District is of sufficient size, compactness, and
8 contiguity to be developed as a functional interrelated community.

9
10 The qualities of compactness, contiguity, and size relate directly to whether an area can
11 become one functional interrelated community. From the standpoint of the provision,
12 management and operation of the community infrastructure expected to be provided by the
13 District, the acres contemplated for inclusion within the District is sufficiently compact,
14 contiguous and of sufficient size to maximize the successful delivery of these infrastructure
15 improvements to these lands. The delivery of services and facilities to the lands within the
16 District will not be hampered by insurmountable barriers or spatial problems. The area
17 within the District is suitably configured to maximize the benefits available from the
18 District services and facilities to be provided.

19
20 **22. Do you have an opinion, as someone experienced in district management and**
21 **operations, as to whether the area that will be served by the proposed District is**
22 **amenable to separate special district government?**

23
24 Yes.

25
26 **23. What is your opinion?**

27
28 The District is of sufficient size, compactness, and contiguity. Therefore, the area to be
29 served by the proposed District is clearly amenable to separate special district governance.
30 The configuration of the District is not unlike other CDDs with which I have worked over
31 time.

32
33 **24. What is the basis for your opinion?**

34
35 Two criteria are needed to evaluate a land area as amenable to separate special district
36 government. One, does the land area have need for the facility and services and will its
37 owners and residents benefit from facilities that the special district could provide? Two, is
38 the land area of sufficient size, sufficient compactness, and sufficiently contiguous to be
39 the basis for a functional interrelated community?

40
41 Under both criteria, the CDD is a planned community of sufficient size with a need for the
42 facilities and improvements that are presently expected to be provided by the CDD. As
43 described in the Petition, the District will construct and maintain certain identified needed
44 facilities and services. In particular, this District will have significant responsibilities for
45 a relatively large amount of drainage and stormwater management to serve the community.
46 Water and sewer improvements constructed by the CDD will be transferred to the County

1 and roadway improvements will be owned and maintained by the CDD. Based on my
2 experience, districts of this size are large enough to effectively provide and manage these
3 services. From a management and operations perspective, the land area is well suited to
4 the provision of the proposed services and facilities.
5

- 6 **25. Do you have an opinion, as someone experienced in district management and**
7 **operations, as to whether the community development services and facilities of the**
8 **proposed District will be incompatible with the capacity and use of existing local and**
9 **regional community development services and facilities?**

10
11 Yes.

- 12
13 **26. What is your opinion?**

14
15 The proposed services and facilities of the proposed District are not incompatible with the
16 capacity and uses of existing local or regional community development services and
17 facilities.
18

- 19 **27. What is the basis for your opinion?**

20
21 Petitioner presently expects the proposed District to finance and construct a stormwater
22 management system, onsite roadway improvements, a water distribution system, a sanitary
23 collection and conveyance system, landscape, hardscape, and recreation facilities. None
24 of the facilities expected to be provided by the District presently exist. Ultimately, a district
25 may own and maintain certain of those improvements, such as the recreation improvements
26 and stormwater management system, and the County, or other governmental entities, may
27 own and maintain others. There will be no overlap or incompatibility because the facilities
28 and improvements expected to be provided by the proposed District do not exist today.
29

30 ECONOMICS AND FINANCING

- 31
32 **28. You stated earlier that you are familiar with the Petition, and its Exhibits, filed by the**
33 **Petitioner, to establish the proposed The Gardner Trails Community Development**
34 **District. Are you particularly familiar with Exhibit 7 to the Petition?**

35
36 Yes, Exhibit 7 is the SERC, a requirement of Chapter 190, *Florida Statutes*.
37

- 38 **29. Have any revisions been made to Exhibit 7 of the Petition, the SERC?**

39
40 Yes. Table 1 of Exhibit 7 was revised to clarify the ownership entity of the collector
41 roadway, onsite local roadways, water distribution system, and sanitary collection and
42 conveyance system.
43

- 44 **30. What exactly is a "SERC"?**

45
46 The Statement of Estimated Regulatory Costs is actually a requirement under Section

1 120.541(2), *Florida Statutes*, which has been incorporated into the law on establishment
2 of community development districts.
3

4 **31. In general terms, please summarize the economic analyses presented in the SERC.**

5 An understanding of the SERC requires the recognition of the scope of review and
6 evaluation for the establishment of a community development district as set out in Chapter
7 190. Section 190.002(2)(d), *Florida Statutes*, states “[t]hat the process of establishing such
8 a district pursuant to uniform general law [must] be fair and based only on factors material
9 to managing and financing the service-delivery function of the district, so that any matter
10 concerning permitting or planning of the development is not material or relevant.” Thus,
11 the scope of the economic analysis included in the SERC addresses only the establishment
12 of the proposed District, and not the planning or development of the property itself.
13

14 The economic analysis sets out the assumptions about the development within the proposed
15 district and the anticipated infrastructure to be provided by it. The analysis addresses each
16 of the potentially affected parties defined in Chapter 120, *Florida Statutes*, and evaluates
17 the impact of the proposed district on each such group.
18

19 The proposed The Gardner Trails Community Development District is a specialized unit
20 of local government. It is a special purpose unit of local government with a single
21 objective: the provision of infrastructure and services for a planned new community. Its
22 economic benefits exceed its economic cost to the Petitioner, the County, and to all
23 subsequent purchasers and landowners of the community - in short, to all affected parties.
24

25 Once the proposed District is established, there are no direct costs to the County. While the
26 proposed District will provide certain reports and budgets to the County for its
27 discretionary review, there are no requirements that either incur any obligations or expense
28 associated with its review. In addition, to the extent the proposed District utilizes the
29 services of the Property Appraiser or Tax Collector under the provisions of Chapter 197,
30 *Florida Statutes*, to collect its assessments, the proposed District must pay the costs
31 associated with those services.
32

33 It is important to note that under Chapter 190, the debt of the proposed District cannot
34 become the debt of the County or the State of Florida. Since the proposed District will be
35 an independent unit of government and issue its own bonds, the proposed District will not
36 have any effect on the bonding capacity of the County or the State of Florida.
37

38 **32. Please describe briefly the data and methodology used in preparing the SERC and**
39 **related analyses.**
40

41 The data for the analysis came from the landowner, other experts working on the Petition,
42 and from the Petition itself. The methodology is standard economic impact assessment.
43

44 **33. From an economic and financial perspective, do you have an opinion regarding the**
45 **financial viability and feasibility of the proposed District?**
46

1 Yes, I do.

2
3 **34. What is that opinion?**
4

5 In my opinion, based on my experience with other districts, the proposed The Gardner
6 Trails Community Development District is expected to be financially viable and feasible.
7

8 **35. Are you familiar with the State Comprehensive Plan found in Chapter 187, *Florida***
9 ***Statutes*?**
10

11 Yes.

12
13 **36. From an economic and financial perspective, do you have an opinion as to whether**
14 **the proposed District is inconsistent with the State Comprehensive Plan from an**
15 **economic perspective?**
16

17 Yes.

18
19 **37. What is that opinion?**
20

21 It is my opinion that the proposed The Gardner Trails Community Development District is
22 not inconsistent with any applicable element or portion of the state comprehensive plan.
23

24 **38. What is the basis for your opinion?**
25

26 I have reviewed, from an economic and financial perspective, the State Comprehensive
27 Plan, particularly those portions that relate to community development districts. The State
28 of Florida Comprehensive Plan (Chapter 187, *Florida Statutes*) “provides long-range
29 policy guidance for the orderly social, economic, and physical growth of the state.” From
30 an economic and financial perspective, four subjects, subjects 15, 17, 20, and 25 of the
31 State Comprehensive Plan are relevant to the establishment of a CDD.
32

33 Subject 15, titled Land Use, recognizes the importance of locating development in areas
34 that have the fiscal abilities and service capacity to accommodate growth. It is relevant
35 because CDDs are designed to provide infrastructure services and facilities in a fiscally
36 responsible manner to the areas that can accommodate development. The establishment of
37 the District will not be inconsistent with this goal because the District will have the fiscal
38 capability to provide the specified services and facilities within its boundaries.
39

40 Subject 17, titled Public Facilities, relates to (i) protecting investments in existing public
41 facilities; (ii) providing financing for new facilities, (iii) allocating the costs of new public
42 facilities on the basis of the benefits received by future residents; (iv) implementing
43 innovative but fiscally sound techniques for financing public facilities; and (v) identifying
44 and using stable revenue sources for financing public facilities. The establishment of the
45 District will further these State Comprehensive Plan Goals and Policies.
46

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

- (i) cooperate with other levels of Florida government;
- (ii) be established under uniform general law standards as specified in Chapter 190, *Florida Statutes*;
- (iii) be professionally managed, financed, and governed by those whose property directly receives the benefits;
- (iv) not burden the general taxpayer with costs for services or facilities inside The Gardner Trails Community Development District; and
- (v) plan and implement cost efficient solutions for the required public infrastructure and assure delivery of selected services to residents.

Subject 25, titled Plan Implementation, calls for systematic planning capabilities to be integrated into all levels of government throughout the state, with particular emphasis on improving intergovernmental coordination and maximizing citizen involvement. The proposed District is consistent with this element of the State Comprehensive Plan.

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

Yes.

40. What is your opinion?

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

41. What is the basis for your opinion?

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

42. From a financial perspective, do you have an opinion as to whether the proposed The Gardner Trails Community Development District is the best alternative available for providing the proposed community development services and facilities to the area to be served?

Yes.

1
2 **43. What is your opinion?**
3

4 The proposed District is the best alternative to provide community development facilities
5 to the area to be served. This is true for the landowners and the governmental entities for
6 the following reasons.
7

8 From the perspective of current and future property owners within the District, the District
9 is the best alternative for providing community facilities, infrastructure, and services. The
10 land development envisioned for the area within the District boundaries will require
11 substantial provision of infrastructure, facilities and services. The CDD is an alternative
12 method to provide these necessary services. The CDD can access the tax-exempt public
13 capital markets and thereby fund these facilities and services at a lower cost than the
14 alternative of developer funding. Furthermore, unlike a property owners association
15 (“POA”) the CDD has the power to assess property and collect those assessments along
16 with other property taxes. Therefore, a CDD can fund large capital improvement programs
17 that a POA cannot.
18

19 With regard to the operations and maintenance of community facilities and services the
20 CDD is also the best alternative. The CDD is preferable to a POA to future landowners for
21 the following reasons. First, unlike a POA, the CDD collects funds for operations and
22 maintenance directly from assessments collected along with all other property taxes, which
23 is a more assured income stream. Unlike a POA, a CDD is a unit of local government,
24 and it must hold its meetings in the sunshine and bid out its contracts where required by
25 law. A CDD provides control to the landowners much sooner in time than a POA. A CDD
26 is focused on providing the community with services, facilities, and their maintenance in a
27 way the general-purpose government, with its competing interests and broad
28 responsibilities, is not. This level of local control serves the best interests of property
29 owners in the CDD.
30

31 From the perspective of the State of Florida and the County, a CDD is the best alternative
32 for providing community facilities and their operations and maintenance for a variety of
33 reasons. First, as noted above, compared to a POA the CDD is a more powerful and more
34 responsive organization for providing and maintaining infrastructure and services. Second,
35 without a CDD the County may have to assume greater responsibility for construction,
36 operations, and maintenance of community facilities and services. Even if the County
37 formed a dependent district to provide community facilities and services to the area to be
38 served by the CDD, and charged appropriately for these services, the County would be
39 enmeshed in the responsibilities and in the management of those facilities. Furthermore,
40 without a CDD the County cannot be assured that only residents of the area to be served
41 by the CDD would bear the full costs of the needed facilities and services.
42

43 **44. From an economic and financial perspective, do you have an opinion as to whether**
44 **the services and facilities to be provided by the proposed The Gardner Trails**
45 **Community Development District will be incompatible with the uses and existing**
46 **local and regional facilities and services?**

1
2 Yes.

3
4 **45. What is your opinion?**

5
6 The proposed The Gardner Trails Community Development District covers approximately
7 160.278 acres of land, more or less. The configuration of the land is sufficiently compact
8 and contiguous. As such, it will not create any economic disincentives to the provision of
9 the infrastructure facilities contemplated in this case.

10
11 Given the scope and expected cost of facilities to be provided, 160.278 acres of land, more
12 or less for a residential development provides a sufficient economic base to absorb the debt
13 costs and annual operating costs for district administration and to efficiently apportion the
14 cost of improvements.

15
16 **46. From an economic and financial perspective, do you have an opinion as to whether**
17 **the area that will be served by the proposed The Gardner Trails Community**
18 **Development District is amenable to separate special district government?**

19
20 Yes.

21
22 **47. What is your opinion and its basis?**

23
24 It is my opinion that the area within the boundaries of the proposed District is amenable to
25 a separate special district government. The lands within the proposed District's boundaries
26 have the need for basic infrastructure.

27
28 The land is of sufficient size, compactness, and contiguity and meets those tests. Therefore,
29 from an economic and financial perspective, the area to be served by the proposed District
30 is clearly amendable to separate special district governance.

31
32 **48. Does this conclude your testimony?**

33
34 Yes, it does.