CITY OF ALAMEDA

Report for:

Community Facilities District No. 25-1 (West Midway Facilities)

Special Tax Report

October 2025

Prepared by NBS for and on behalf of the City of Alameda

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INTRODUCTION

The City Council (the "City Council") of the City of Alameda (the "City") did, pursuant to the provisions of the Mello-Roos Community Facilities Act of 1982 (Sections 53311 and following, California Government Code; hereafter referred to as the "Act"), on September 2, 2025, adopted Resolution # 16310 "Declaring Intention to Form City of Alameda Community Facilities District No. 25-1 (West Midway Facilities), and to Authorize the Levy of a Special Tax Therein to Finance Public Facilities in and for Such Community Facilities District" (the "Resolution of Intention"). In the Resolution of Intention, the City Council directed the study and filing of a public hearing report (the "Report") required by Section 53321.5 of the Act for the proposed City of Alameda Community Facilities District No. 25-1 (West Midway Facilities) (the "CFD").

Section 53321.5 of the Act provides that the Report contain the following:

- 1. A brief description of the public facilities or services to be provided by the CFD; and
- 2. An estimate of the fair and reasonable cost of providing the public facilities or services, including the incidental expenses in connection therewith, any City administration costs, and all other related costs.

For particulars, reference is made to the Resolution of Intention for the CFD, as previously adopted on September 2, 2025, by the City Council.

NOW, THEREFORE, the City Finance Director, the appointed responsible officer directed to prepare the Report or cause the Report to be prepared pursuant to the provisions of the Act, does hereby submit this Report containing the following information:

- **CFD INFORMATION**. Information related to the CFD, including background information, land use plans, and the proposed boundaries that include those properties and parcels on which special taxes may be levied to pay for the costs and expenses of the facilities or services.
- **DESCRIPTION OF FACILITIES OR SERVICES**. A description of the facilities or services that the City Council has determined to be eligible to be funded by the CFD.
- **COST ESTIMATE**. The initial maximum cost estimate for the CFD facilities or services and the anticipated initial maximum special tax revenue.
- RATE AND METHOD OF APPORTIONMENT. The Rate and Method of Apportionment of Special Tax, which was included in the Resolution of Intention and approved by this City Council on September 2, 2025.

CFD INFORMATION

Location

The CFD is generally located at the northwest corner of Main Street and Tower Avenue in the City.

Proposed Land Use

At buildout, there is anticipated to be 478 Units of multi-family residential property of various product types within the CFD.

CFD Boundary Description

The proposed boundaries of the CFD are those parcels in	n which special taxes may be levied and collected to
pay for the costs and expenses of the CFD facilities. The	e proposed boundaries of the CFD are identified o
the map of the CFD recorded on, 2025,	, in Book at Page of Maps of Assessment and
Community Facilities Districts as Document No	in the office of the County Recorder for the
County of Alameda. The CFD map is on file with the Cit	ty Clerk, to which reference is hereby made and
reduced copy of such map is set forth in Appendix A of th	his Report.

DESCRIPTION OF AUTHORIZED FACILITIES

The CFD shall be eligible to finance all or a portion of the costs of the following:

The acquisition and construction of: roadways, sanitary sewer systems and any components thereof, stormwater drainage systems and any components thereof, water systems and any components thereof, curbs, gutters and sidewalks, and street lights and traffic signals, all within and in the vicinity of the CFD; including the acquisition of any related right-of-way and other land needed for the installation of any such improvements, demolition of existing structures and site leveling needed for the installation of any such improvements, erosion control, landscaping, joint trench, acquisition and installation of street furniture, and other appurtenances.

The facilities eligible to be financed shall include the costs of design, engineering, and planning, the costs of any environmental or other studies, surveys or reports, the cost of any required environmental mitigation, soils testing, permits, plan check and inspection fees, insurance, legal and related overhead costs, coordination and supervision, City of Alameda staff and consultant costs, and any other costs or appurtenances related to any of the public improvements to be financed or any of the foregoing.

Authorized facilities include development impact fees paid and not otherwise reimbursed, whether standard City fees levied at the time of issuance of a building permit or required as part of the Development Agreement for the property. Fees include but are not limited to, Main Street Adaptation Contribution Fee, Sewer Connection Fee, City of Alameda Development Impact Fee ("DIF") (Public Safety Facilities Fee, General Public Facilities Fee, Transportation Fee, Park and Recreation Facilities Fee), Public Art Fee, Citywide Inclusionary Fee/Affordable Housing Fee and any other eligible fees from the City or other jurisdictions.

COST ESTIMATE

Initial Maximum Amount Proposed to be Expended

The annual budget for the CFD presented below represents the initial maximum costs for financing CFD facilities as well as the estimated costs for Fiscal Year 2025/26.

CFD Costs	2025/26 Maximum Budget Amount	2025/26 Estimated Budget Amount
Debt Service/Administrative Expenses/Pay-As-You-Go-Expenditures	\$1,018,075	\$1,018,075
Total:	\$1,018,075	\$1,018,075

Anticipated Fiscal Year 2025/26 Maximum Special Tax Revenue

The initial maximum annual special tax rates are set forth in the Rate and Method of Apportionment for the CFD. Based upon expected development, the initial maximum annual special tax revenue is as follows:

ASSIGNED SPECIAL TAX FOR DEVELOPED PROPERTY FISCAL YEAR 2025/26

			Maximum Annual
	Assigned		Special Tax
Description	Special Tax	Per	Revenue
Affordable Workforce Property	\$0	Dwelling Unit	\$0
Affordable Four-Story Townhome Property	\$0	Dwelling Unit	\$0
Duet Property	\$3,800	Dwelling Unit	\$228,000
Four-Story Townhome Property < 2,000 BSF	\$1,300	Dwelling Unit	\$71,500
Four-Story Townhome Property > 2,000 BSF	\$2,400	Dwelling Unit	\$136,800
Three-Story Interlocking Property	\$2,050	Dwelling Unit	\$184,500
Three-Story Townhome Property	\$2,900	Dwelling Unit	\$319,000
Workforce Property – Market Rate < 1,200 BSF	\$975	Dwelling Unit	\$30,225
Workforce Property – Market Rate > 1,200 BSF	\$1,550	Dwelling Unit	\$48,050
Non-Residential Property	\$0.00	Acre	\$0
		Total	\$1,018,075

Annual Maximum Special Tax Escalation

On each July 1, commencing on July 1, 2026, the Assigned Special Tax for Developed Property shall be increased by an amount equal to two percent (2%) of the amount in effect for the previous Fiscal Year.

RATE AND METHOD OF APPORTIONMENT

All of the property located within the CFD, unless exempted by law or by the Rate and Method of Apportionment, shall be taxed for the purpose of providing the necessary facilities for the CFD. Pursuant to Section 53325.3 of the Act, the tax imposed "is a special tax and not a special assessment, and there is no requirement that the tax be apportioned on the basis of benefit to any property." The special tax "may be based on benefit received by parcels of real property, the cost of making facilities available to each parcel, or other reasonable basis as determined by the legislative body," although the special tax may not be apportioned on an ad valorem basis pursuant to Article XIIIA of the California Constitution.

As shown in Appendix B, the Rate and Method of Apportionment provides information sufficient to allow each property owner to estimate the maximum special tax that he or she will be required to pay.

Term of Special Tax

The special tax shall be levied and collected as needed to fund the annual special tax requirement for up to 40 years from the initial levy of the special tax. In any event no special tax shall be levied for the CFD after the 2064/65 Fiscal Year.

Manner of Collection

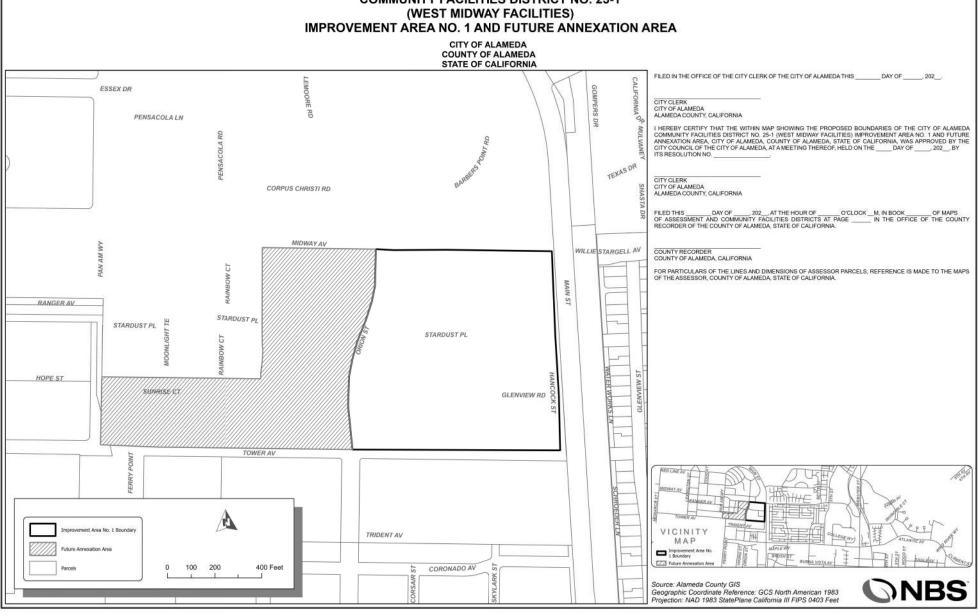
The special taxes shall be collected in the same manner and at the same time as ordinary ad valorem property taxes, provided, that the administrator of the CFD may directly bill the special tax, may collect the special tax at a different time or in a different manner if needed to meet the financial obligations of the CFD. The City may covenant to foreclose and may actually foreclose or cause an action for foreclosure to be prosecuted in respect of Assessor's Parcels of Taxable Property that are delinquent in the payment of the Special Tax.

APPENDIX A: BOUNDARY MAP

The boundary map for the CFD is shown on the following page. The lines and dimensions of each lot or parcel within the CFD are those lines and dimensions shown on the maps of the County Assessor, at the time this Report was prepared, and are incorporated by reference herein and made part of this Report.

Sheet 1 of 1

PROPOSED BOUNDARIES OF CITY OF ALAMEDA COMMUNITY FACILITIES DISTRICT NO. 25-1 (WEST MIDWAY FACILITIES) MPROVEMENT AREA NO. 1 AND FUTURE ANNEXATION AR



APPENDIX B: RATE AND METHOD OF APPORTIONMENT

The following pages provide a copy of the CFD's Rate and Method of Apportionment approved by the City Council on September 2, 2025, via Resolution # 16310.

RATE AND METHOD OF APPORTIONMENT OF SPECIAL TAXES FOR CITY OF ALAMEDA COMMUNITY FACILITIES DISTRICT NO. 25-1 (WEST MIDWAY FACILITIES)

IMPROVEMENT AREA NO. 1

A Special Tax, as hereinafter defined, shall be levied and collected within Improvement Area No. 1 of the City of Alameda Community Facilities District No. 25-1 (West Midway Facilities) each Fiscal Year commencing in Fiscal Year 2025/26, in an amount determined by the application of the procedures below. All Taxable Property within Improvement Area No. 1, as hereinafter defined, unless exempted by law or by the provisions hereof, shall be taxed for the purposes, to the extent and in the manner herein provided. To the extent additional property annexes to Improvement Area No. 1 in the future, this Rate and Method of Apportionment shall be supplemented to reflect the Special Taxes applicable thereto.

A. DEFINITIONS

The terms hereinafter set forth have the following meaning:

"Accessory Dwelling Unit" or "ADU" means all Assessor's Parcels of Residential Property for which a building permit(s) has been issued for an "Accessory Dwelling Unit" as defined in California Government Code Section 65852.2(j)(1), as may be amended from time to time, that is accessory to a primary Dwelling Unit.

"Acre" or "Acreage" means the land area of an Assessor's Parcel as shown on an Assessor's Parcel Map. In the event that the Assessor's Parcel Map shows no acreage, the Acreage for any Assessor's Parcel may be determined by the CFD Administrator based upon, in the CFD Administrator's discretion, the applicable condominium plan, final map, parcel map, Assessor's Data or by using available spatial data and GIS.

"Act" means the City's Special Tax Financing Improvement Code, Section 3-70.1 *et seq.* of the City Municipal Code.

"Administrative Expenses" means the actual or reasonably estimated costs directly related to the administration of Improvement Area No. 1 including, but not limited to, the following: the costs of any paying agents/fiscal agents/trustees related to Improvement Area No. 1 Bond payments (including the fees and expenses of related counsel); the costs of computing the Annual Special Tax Requirement, the Special Taxes and of preparing the collection schedules for the Special Taxes; the costs of collecting the Special Taxes, including any charges levied by the County Auditor's Office, County Tax Collector's Office or County Treasurer's Office; the costs of the City or designee in complying with the disclosure requirements associated with applicable federal and state securities laws, or otherwise related to Improvement Area No. 1 or Improvement Area No. 1 Bonds; the City's annual administration fees and third party expenses; costs of responding to public inquiries regarding the Special Taxes; the costs of the City or designee related to an appeal of the Special Tax or interpretation of this Rate and Method of Apportionment of Special Taxes; amounts needed to pay any required arbitrage rebate to the federal government related to Improvement Area No. 1 Bonds; the costs associated with the release of funds from any escrow account; and the costs of commencing and pursuing to completion any foreclosure action

arising from delinquent Special Taxes in Improvement Area No. 1. Administrative Expenses shall also include amounts estimated or advanced by the City or Improvement Area No. 1 for any other administrative purposes of Improvement Area No. 1.

"Affordable Four-Story Townhome Property" means all Assessor's Parcels of Developed Property designated as 4 Story Condos on Attachment A to this RMA that qualify as MIBMR Property.

"Affordable Workforce Property" means all Assessor's Parcels of Developed Property designated as 3 Story Condos on Attachment A to this RMA that qualify as MIBMR Property.

"Annual Special Tax Requirement" means that amount required in any Fiscal Year for Improvement Area No. 1 to (1) pay Debt Service on all Outstanding Improvement Area No. 1 Bonds due in the Debt Year that commences in such Fiscal Year; (2) pay debt service on bonds expected to be issued by Improvement Area No. 1 due in the Debt Year that commences in such Fiscal Year; (3) pay Administrative Expenses; (4) provide any amount required to establish or replenish a reserve fund in connection with any Improvement Area No. 1 Bonds; (5) provide an amount equal to reasonably anticipated Special Tax delinquencies based on the delinquency rate for Special Taxes levied in the previous Fiscal Year as determined by the CFD Administrator, as limited by the Act, and without duplicating any amounts described in clauses (3) or (4); and (6) account for Pay-As-You-Go Expenditures for the Authorized Facilities. The amounts referred to in clauses (1) through (5) of the preceding sentence may be reduced in any Fiscal Year (in the City's sole discretion) by (i) surplus balances in funds and accounts for Improvement Area No. 1 Bonds to the extent that such balances are available to apply against Debt Service pursuant to the Indenture, (ii) proceeds from the collection of penalties associated with delinquent Special Tax, and (iii) any other revenues available to pay Debt Service on the Outstanding Improvement Area No. 1 Bonds or other indebtedness as determined by the CFD Administrator.

"Assessor's Data" means the property characteristic data compiled and maintained by the County Assessor for each Assessor's Parcel, including, but not limited to, Assessor's Parcel Number, Acreage, Building Square Footage, and Dwelling Units.

"Assessor's Parcel" or "Parcel" means a lot or parcel shown in an Assessor's Parcel Map with an assigned Assessor's Parcel Number.

"Assessor's Parcel Map" means an official map of the County Assessor designating parcels by Assessor's Parcel Number.

"Assessor's Parcel Number" or "APN" means, with respect to an Assessor's Parcel, that number assigned to such Assessor's Parcel by the County for purposes of identification.

"Assigned Special Tax" means the Assigned Special Tax determined in accordance with Section C below, that can be levied in any Fiscal Year on any Assessor's Parcel of Taxable Property.

"Authorized Facilities" means the public facilities and fees authorized to be financed, in whole or in part, by CFD No. 25-1, including, but not limited to, Improvement Area No. 1 Bonds or Special Tax revenue dedicated to Pay-As-You-Go Expenditures for Improvement Area No. 1.

"Backup Special Tax" means the Backup Special Tax applicable to each Assessor's Parcel of Developed Property, as determined in accordance with the applicable subsection of Section C below.

"Boundary Map" means the map titled "Proposed Boundaries of City of Alameda Community Facilities District No. 25-1 (West Midway Facilities) Improvement Area No. 1 and Future Annexation Area" recorded with the recorder of the County on _______.

"Building Permit" means a permit issued by the City for new construction of a residential or non-residential building on an Assessor's Parcel.

"Building Square Feet" or "BSF" means all of the square footage of living area within the perimeter of a residential structure, not including any carport, walkway, garage, overhang, patio, enclosed patio, or similar area. The determination of Building Square Feet shall be made by reference to the building permit(s) issued for such residential Dwelling Unit. In the event that the building permit does not show Building Square Feet, other records of the City or Assessor's Data shall be used as determined by the CFD Administrator.

"CFD Administrator" means an official of the City, or designee thereof, responsible for determining the Annual Special Tax Requirement, and otherwise providing for the levy and collection of the Special Taxes.

"CFD No. 25-1" means City of Alameda Community Facilities District No. 25-1 (West Midway Facilities), established by the City Council pursuant to the Act.

"City" means the City of Alameda, California.

"City Council" means the City Council of the City, acting as the legislative body of CFD No. 25-1.

"County" means the County of Alameda, California.

"Debt Service" means for each Debt Year, the total amount of principal and interest due on any Outstanding Improvement Area No. 1 Bonds.

"Debt Year" means the twelve (12) month period ending on the second debt service payment date of each calendar year.

"Developed Property" means, in any Fiscal Year, all Taxable Property in Improvement Area No. 1 for which a Building Permit for new construction was issued by the City prior to May 1 of the preceding Fiscal Year.

"Development Class" means, individually, Developed Property, Final Map Property, Taxable Property Owners Association Property and Taxable Public Property.

"Duet Property" means all Assessor's Parcels of Developed Property designated as *3 Story Duets* on Attachment A to this RMA.

"Dwelling Unit" means an individual single family detached residential unit or an individual residential unit within a duet, duplex, triplex, fourplex, townhome or condominium structure. The number of Dwelling Units assigned to each Assessor's Parcel may be determined by (i) referencing Assessor's Data, (ii) site surveys and physical unit counts, and/or (iii) other research by the CFD Administrator. An Accessory Dwelling Unit shall not be considered a Dwelling Unit for the purposes of the Special Tax.

"Exempt Property" means all property located within the boundaries of Improvement Area No. 1 which is exempt from the Special Tax pursuant to the Act or Section E below.

"Final Map Property" means, in any Fiscal Year, all Residential Lots created within a Final Subdivision Map which has recorded prior to June 30 of the preceding Fiscal Year.

"Final Subdivision Map" means a final subdivision map, parcel map or lot line adjustment, approved by the City pursuant to the Subdivision Map Act (California Government Code Section 66410 *et seq.*) or recordation of a condominium plan pursuant to California Civil Code 4285, that creates individual lots for which Building Permits may be issued without further subdivision of such property.

"Fiscal Year" means the period starting July 1 and ending on the following June 30.

"Four-Story Townhome Property" means all Assessor's Parcels of Developed Property designated as *Four-Story Condos Property* on Attachment A to this RMA.

"GIS" or "Geographic Information System" means a system designed to capture, store, manipulate, analyze, manage, and present spatial or geographic data.

"Improvement Area No. 1" means Improvement Area No. 1 of CFD No. 25-1.

"Improvement Area No. 1 Bonds" means bonds or other Debt (as defined in section 53317 of the Act), whether in one or more series, issued or assumed by or on behalf of the City for Improvement Area No. 1 under the Act, and secured by pledge of the Special Taxes.

"Indenture" means the indenture, fiscal agent agreement, resolution, or other instrument pursuant to which Improvement Area No. 1 Bonds are issued, as modified, amended, and/or supplemented from time to time, and any instrument replacing or supplementing the same.

"Land Use Class" means any of the classes listed in Table 1 in Section C herein.

"Maximum Special Tax" means the Maximum Special Tax, determined in accordance with Section C below, that can be levied in any Fiscal Year on any Assessor's Parcel of Taxable Property.

"Moderate Income Below Market Rate Property" or "MIBMR Property" means all Assessor's Parcels of Residential Property that were privately developed and privately owned or rented but where ownership or rentals are restricted to persons or families meeting the qualifying income standards for moderate income households as defined by California Health and Safety Code Sections 50093, or any successor statute thereto. Residential Properties that qualify shall be designated as MIBMR Property in the chronological order in which the Building Permits for such properties are issued. If the total number of Dwelling Units on Residential Property that would otherwise qualify as MIBMR Property exceeds 44, then the Residential Properties exceeding such total shall not be considered MIBMR Property for purposes of levying the Special Tax and shall be assigned to a the appropriate Land Use Class based on the location for such Residential Property by referencing Attachment A to this RMA.

"Non-Residential Property" means, in any Fiscal Year all Assessor's Parcels of Developed Property for which a building permit(s) was issued for a structure intended for non-residential use.

"Open Space Property" means property within the boundaries of Improvement Area No. 1 which (i) has been designated with specific boundaries and Acreage on a final subdivision map as open space, (ii) has been irrevocably offered for dedication as open space to the federal government, the State, the County,

the City, or any other public agency, or (iii) is encumbered by an easement or other restriction required by the City limiting the use of such property to open space.

"Outstanding Improvement Area No. 1 Bonds" means all Improvement Area No. 1 Bonds which are outstanding under and in accordance with the provisions of the Indenture.

"Pay-As-You-Go Expenditure" means Special Tax revenue, which is used or set aside for Authorized Facilities, including for Authorized Facilities to be constructed or acquired by Improvement Area No. 1. Pay-As-You-Go Expenditures shall be included in the Special Tax Requirement until the earlier of (A) the date that Special Taxes have been levied on Developed Property for 10 years in Improvement Area No. 1 and (B) the date that all of the Authorized Facilities for the Project have been financed. Special Taxes for Pay-As-You-Go Expenditures may only be levied against Developed Property.

"Property Owner's Association" or "POA" means any duly constituted property owner's association. As used in this definition, a Property Owner's Association includes any home-owner's association, condominium owner's association, master or sub-association or non-residential owner's association.

"Property Owner's Association Property" means any property within the boundaries of Improvement Area No. 1 which is (a) owned by a Property Owner's Association or (b) designated with specific boundaries and acreage on a final subdivision map as Property Owner Association Property.

"Proportionately" means, for each Development Class, that the ratio of the actual Special Tax levied in any Fiscal Year to the Maximum Special Tax authorized to be levied in that Fiscal Year is equal for all Parcels assigned to such Development Class.

"Public Property" means any property within the boundaries of Improvement Area No. 1 which (i) is owned by a public agency, (ii) has been irrevocably offered for dedication to a public agency, or (iii) is designated with specific boundaries and Acreage on a final subdivision map as property which will be owned by a public agency. For purposes of this definition, a public agency includes the federal government, the State, the County, the City, school districts, or any other governmental agency.

"Rate and Method of Apportionment" means this Rate and Method of Apportionment of Special Taxes for Improvement Area No. 1.

"Residential Lot" means, an individual residential lot within a recorded Final Subdivision Map on which a Building Permit has been or is permitted to be issued for construction of one or more Dwelling Units.

"Residential Property" means all Assessor's Parcels of Developed Property for which a Building Permit has been issued for purposes of constructing one or more residential Dwelling Units.

"Special Tax(es)" means the special tax or special taxes to be levied in each Fiscal Year on each Assessor's Parcel of Taxable Property within Improvement Area No. 1 to fund the Annual Special Tax Requirement.

"State" means the State of California.

"Taxable Property" means all the Assessor's Parcels within the boundaries of Improvement Area No. 1 that are not exempt from the Special Tax pursuant to law or Section E below.

"Taxable Property Owner Association Property" means all Assessors Parcels of Property Owner Association Property that are not exempt pursuant to Section E herein.

"Taxable Public Property" means all Assessor's Parcels of Public Property within the boundaries of Improvement Area No. 1 that were privately-owned and subject to the Special Tax prior to a public agency acquiring such Assessor's Parcel and that are not exempt pursuant to the Act or Section E herein.

"Three-Story Interlocking Property" means all Assessor's Parcels of Developed Property designated as 3 Story Townhomes – B on Attachment A to this RMA.

"Three-Story Townhome Property" means all Assessor's Parcels of Developed Property designated as 3 Story Townhomes – A on Attachment A to this RMA.

"Trustee" means the trustee or fiscal agent or paying agent acting as such under the applicable Indenture.

"Undeveloped Property" means, for each Fiscal Year, all Taxable Property not classified as Developed Property, Final Map Property, Taxable Property Owner Association Property, or Taxable Public Property.

"Welfare Exempt Property" means, in any Fiscal Year, all Parcels within the boundaries of Improvement Area No. 1 that (a) have been granted a welfare exemption by the County under subdivision (g) of Section 214 of the Revenue and Taxation Code indicated in the Assessor's Data finalized as of January 1 of the previous Fiscal Year, and (b) are exempt from the Special Tax pursuant to Section 53340(c) of the Act. Pursuant to Section 53340(c) of the Act, after the issuance of the first series of Improvement Area No. 1 Bonds, as applicable, any Assessor's Parcels that received a welfare exemption under subdivision (g) of Section 214 of the Revenue and Taxation Code shall not be classified as Welfare Exempt Property and will be subject to the Special Tax.

"Workforce Property – Market Rate" means all Assessor's Parcels of Developed Property designated as *3 Story Condos* on Attachment A to this RMA.

B. ASSIGNMENT TO LAND USE CATEGORIES

Each Fiscal Year, the CFD Administrator shall determine the Assessor's Parcel Numbers for all Taxable Property within Improvement Area No. 1 for the then-current Fiscal Year. To the extent a Parcel or Parcels of Taxable Property are subdivided, consolidated, or otherwise reconfigured, the Maximum Special Tax shall be assigned to the new Assessor's Parcels Numbers pursuant to Section C. The CFD Administrator shall also determine: (i)the appropriate Development Class for each Parcel of Taxable Property; (ii) the number of Dwelling Units or Acreage each Parcel contains; (iii) the Land Use Class of each Parcel; and (iv) the Annual Special Tax Requirement for the Fiscal Year.

C. MAXIMUM SPECIAL TAX RATES

1. Developed Property

The Maximum Special Tax for each Assessor's Parcel of Developed Property shall be the greater of (i) the amount derived by application of the Assigned Special Tax or (ii) the amount derived by application of the Backup Special Tax.

a. Assigned Special Tax

The Assigned Special Tax for each Assessor's Parcel of Developed Property is shown in Table 1.

TABLE 1

ASSIGNED SPECIAL TAX FOR DEVELOPED PROPERTY IMPROVEMENT AREA NO. 1 FISCAL YEAR 2025/26

Land Use		Assigned	
Class	Description	Special Tax	Per
1	Affordable Workforce Property	\$0	Dwelling Unit
2	Affordable Four-Story Townhome Property	\$0	Dwelling Unit
3	Duet Property	\$3,800	Dwelling Unit
4	Four-Story Townhome Property < 2,000 BSF	\$1,300	Dwelling Unit
5	Four-Story Townhome Property > 2,000 BSF	\$2,400	Dwelling Unit
6	Three-Story Interlocking Property	\$2,050	Dwelling Unit
7	Three-Story Townhome Property	\$2,900	Dwelling Unit
8	Workforce Property – Market Rate < 1,200 BSF	\$975	Dwelling Unit
9	Workforce Property – Market Rate > 1,200 BSF	\$1,550	Dwelling Unit
10	Non-Residential Property	\$0.00	Acre

b. Backup Special Tax

The Fiscal Year 2025/26 aggregate Backup Special Tax attributable to Developed Property will equal the Maximum Special Tax as determined in Section 2.b., below, when such property became Final Map Property.

c. Increase in the Assigned Special Tax and Backup Special Tax

On each July 1, commencing on July 1, 2026, through July 1, 2064, the Assigned Special Tax and the Backup Special Tax for Developed Property shall be increased by an amount equal to two percent (2%) of the amount in effect for the previous Fiscal Year.

2. Final Map Property

The Maximum Special Tax for each Assessor's Parcel of Final Map Property shall be the greater of (i) the amount derived by application of the Assigned Special Tax or (ii) the amount derived by application of the Backup Special Tax.

a. Assigned Special Tax

The Assigned Special Tax for each Assessor's Parcel of Final Map Property shall be \$2,660 per Residential Lot in Fiscal Year 2025/26.

b. Backup Special Tax

The Fiscal Year 2025/26 aggregate Backup Special Tax attributable to property within a Final Subdivision Map will equal \$70,065 per Acre multiplied by the Acreage of all Taxable Property located within such Final Subdivision Map, excluding Acreage associated with current or expected Taxable Public Property and Taxable Property Owner Association Property.

The Backup Special Tax for each Assessor's Parcel of Residential Property in a Final Subdivision Map shall be computed by dividing the aggregate Backup Special Tax attributable to all Assessor's Parcels of Taxable Property for which building permits for residential construction have or may be issued, as determined in the preceding paragraph, by the number of such Assessor's Parcels (i.e., the number of Residential Lots).

Notwithstanding the foregoing, if all or any portion of a Final Subdivision Map is subsequently changed or modified, then the Backup Special Tax for each Assessor's Parcel of Residential Property in such Final Subdivision Map, or the portion thereof that is changed or modified, shall be a rate per Acre calculated as follows:

- 1. Determine the total Backup Special Taxes anticipated to apply to the changed or modified portion of the Final Subdivision Map prior to the change or modification.
- 2. Divide the amount determined pursuant to paragraph 1 above by the total Acreage of Residential Property excluding Taxable Public Property and Taxable Property Owner Association Property which is ultimately expected to exist in such changed or modified Final Subdivision Map area, as reasonably determined by the CFD Administrator.

The result is the Backup Special Tax per Acre which shall be applicable to all Assessor's Parcels of Residential Property in such changed or modified Final Subdivision Map.

c. <u>Increase in the Maximum Special Tax</u>

On each July 1, commencing on July 1, 2026, through July 1, 2064, the Maximum Special Tax for Final Map Property shall be increased by an amount equal to two percent (2%) of the amount in effect for the previous Fiscal Year.

3. Undeveloped Property, Taxable Property Owner Association Property, and Taxable Public Property

a. Maximum Special Tax

The Maximum Special Tax for each Assessor's Parcel of Undeveloped Property, Taxable Property Owner Association Property, and Taxable Public Property shall be \$70,065 per Acre in Fiscal Year 2025/26.

b. Increase in the Maximum Special Tax

On each July 1, commencing on July 1, 2026, through July 1, 2064, the Maximum Special Tax for Undeveloped Property, Taxable Property Owner Association Property, and Taxable Public Property shall be increased by an amount equal to two percent (2%) of the amount in effect for the previous Fiscal Year.

D. METHOD OF APPORTIONMENT OF THE SPECIAL TAXES

Commencing with Fiscal Year 2025/26 and for each following Fiscal Year, the CFD Administrator shall determine the Annual Special Tax Requirement. The Special Tax shall be levied each Fiscal Year as follows:

First: The Special Tax shall be levied on each Assessor's Parcel of Developed Property at 100% of the applicable Assigned Special Tax until the earlier of (A) the date that Special Taxes have been levied for 10 years on Developed Property in Improvement Area No. 1 and (B) the date that all of the Authorized Facilities for the Project have been financed, after which the Special Tax shall be levied Proportionately on each Assessor's Parcel of Developed Property at a rate up to 100% of the applicable Assigned Special Tax to the extent needed to satisfy the Annual Special Tax Requirement.

Second: If additional monies are needed to satisfy the Annual Special Tax Requirement, excluding any amount for Pay-As-You-Go Expenditures, after the first step has been completed, the Special Tax shall be levied Proportionately on each Assessor's Parcel of Final Map Property at a rate up to 100% of the Maximum Special Tax for Final Map Property to the extent needed to satisfy the Annual Special Tax Requirement.

Third: If additional monies are needed to satisfy the Annual Special Tax Requirement, excluding any amount for Pay-As-You-Go Expenditures, after the second step has been completed, the Special Tax shall be levied Proportionately on each Assessor's Parcel of Undeveloped Property at a rate up to 100% of the Maximum Special Tax for Undeveloped Property to the extent needed to satisfy the Annual Special Tax Requirement.

Fourth: If additional monies are needed to satisfy the Annual Special Tax Requirement, excluding any amount for Pay-As-You-Go Expenditures, after the first three steps have been completed, then the levy of the Special Tax on each Assessor's Parcel of Developed Property whose Maximum Special Tax is determined through the application of the Backup Special Tax shall be increased in equal percentages from the applicable Assigned Special Tax up to 100% of the Maximum Special Tax for each such Assessor's Parcel to satisfy the Annual Special Tax Requirement.

Fifth: If additional monies are needed to satisfy the Annual Special Tax Requirement, excluding any amount for Pay-As-You-Go Expenditures, after the first four steps have been completed, the Special Tax shall be levied on each Assessor's Parcel of Taxable Property Owner Association Property at a rate up to 100% of the Maximum Special Tax for Taxable Property Owner Association Property to the extent needed to satisfy the Annual Special Tax Requirement.

Sixth: If additional monies are needed to satisfy the Annual Special Tax Requirement, excluding any amount for Pay-As-You-Go Expenditures, after the first five steps have been completed, then the Special Tax shall be levied Proportionately on all Taxable Public Property at a rate up to 100% of the Maximum Special Tax for Taxable Public Property to the extent needed to satisfy the Annual Special Tax Requirement.

E. EXEMPTIONS

- No Special Tax shall be levied on up to 2.46 Acres of Property Owner Association Property. Tax-exempt status will be assigned by the CFD Administrator in the chronological order in which property becomes Property Owner Association Property.
- 2. Property Owner Association Property, that is not exempt from the Special Tax under this section, or pursuant to the Act, shall be classified as Taxable Property Owner Association Property. Taxable Property Owner Association Property shall be subject to the levy of the Special Tax and shall be taxed Proportionately as part of the fifth step in Section D above, at up to 100% of the applicable Maximum Special Tax for Taxable Property Owner Association Property.
- 3. No Special Tax shall be levied on Public Property that is not Taxable Public Property. If, after the first issuance of Bonds have been issued, an Assessor's Parcel within the boundaries of Improvement Area No. 1 that was privately-owned and subject to the Special Tax is acquired by a public agency then such Assessor's Parcel shall be classified as Taxable Public Property. Taxable Public Property shall be subject to the levy of the Special Tax and shall be taxed Proportionately as part of the sixth step in Section D above, at up to 100% of the applicable Maximum Special Tax for Taxable Public Property.
- 4. No Special Tax shall be levied on up to 44 Dwelling Units on Residential Property qualifying as MIBMR Property or any Assessor's Parcel in any Fiscal Year in which such Assessor's Parcel is classified as Welfare Exempt Property. However, pursuant to Section 53340(c) of the Act, after the issuance of the first series of Improvement Area No. 1 Bonds, as applicable, any Assessor's Parcels that received a welfare exemption under subdivision (g) of Section 214 of the Revenue and Taxation Code shall not be classified as Welfare Exempt Property and will be subject to the Special Tax.

F. APPEAL OF SPECIAL TAX LEVY

Any property owner may file a written appeal of the Special Tax with the CFD Administrator claiming that the amount or application of the Special Tax is not correct with respect to one or more specific Assessor's Parcels. The appeal must be filed not later than one calendar year after having paid the Special Tax that is disputed, and the appellant must be current in all payments of the Special Taxes theretofore levied on the Assessor's Parcel(s). In addition, during the term of the appeal process, all Special Tax levied must be paid for the subject Assessor's Parcel(s) prior to delinquency.

The appeal must specify the reasons why the appellant claims the Special Tax is in error. The CFD Administrator shall review the appeal, meet with the appellant if the CFD Administrator deems necessary, and advise the appellant of its determination.

If the property owner disagrees with the CFD Administrator's decision relative to the appeal, the owner may then file a written appeal with the City Council whose subsequent decision shall be final and binding on all interested parties. If the decision of the CFD Administrator or subsequent decision by the City requires the Special Tax to be modified or changed in favor of the property owner, then an adjustment shall be made to credit future Special Taxes.

This procedure shall be exclusive and its exhaustion by any property owner shall be a condition precedent to filing any legal action by such owner.

G. INTERPRETATION OF RATE AND METHOD OF APPORTIONMENT

The City may, by resolution or ordinance, interpret, clarify and/or revise this Rate and Method of Apportionment to correct any inconsistency, vagueness, or ambiguity as it relates to the Special Taxes, method of apportionment, classification of Assessor's Parcels, or any definition used herein, as long as once Improvement Area No. 1 Bonds have been issued such correction does not materially adversely affect the levy and collection of Special Taxes on any Assessor's Parcel needed to repay the Improvement Area No. 1 Bonds. In addition, the interpretation and application of any section of this document shall be at the CFD Administrator's discretion.

H. MANNER OF COLLECTION

The Special Taxes shall be collected in the same manner and at the same time as ordinary ad valorem property taxes, provided, that the CFD Administrator may directly bill the Special Tax, may collect the Special Tax at a different time or in a different manner if needed to meet the financial obligations of Improvement Area No. 1. The City may covenant to foreclose and may actually foreclose or cause an action for foreclosure to be prosecuted in respect of Assessor's Parcels of Taxable Property that are delinquent in the payment of the Special Tax.

I. PREPAYMENT OF SPECIAL TAX

The following definitions apply to this Section I:

"Authorized Facilities" means the public facilities authorized to be financed, in whole or in part, by Improvement Area No. 1.

"Buildout" means the state of maximum development of Improvement Area No. 1, based on plans and anticipated development.

"CFD Public Facilities Cost" means \$13,195,000 for Improvement Area No. 1, as described on the Boundary Map, expressed in 2025 dollars, which shall increase by the annual percentage change in the Construction Inflation Index on July 1, 2026 and on each July 1 thereafter, or such lower number as (i) shall be determined by the CFD Administrator as sufficient to provide the public facilities to be provided by Improvement Area No. 1 under the authorized bonding program for Improvement Area No. 1, or (ii) shall be determined by the City Council concurrently with a covenant that it will not issue any more Bonds to be supported by Special Taxes levied under this Rate and Method of Apportionment as described in Section D. If the property described as "Future Annexation Area" on the Boundary Map annexes to Improvement Area No. 1 in the future, then "CFD Public Facilities Cost" shall mean \$17,785,000 for Improvement Area No. 1, expressed in 2025 dollars, and shall increase annually as described above.

"Construction Inflation Index" means the annual percentage change in the Engineering News-Record Building Cost Index for the City of San Francisco, measured as of the calendar year which ends in the previous Fiscal Year, but not less than zero percent. In the event this index ceases to be published, the Construction Inflation Index shall be another index as determined by the City that is reasonably comparable to the Engineering News-Record Building Cost Index for the City of San Francisco.

"Future Facilities Costs" means, as of the date of prepayment, the CFD Public Facilities Costs minus the portion of the CFD Public Facilities Costs previously funded from (a) proceeds of all Previously Issued

Improvement Area No. 1 Bonds, which were, at the time of issuance, available to the City for Authorized Facilities, (b) interest earnings on the Improvement Fund actually earned prior to the date of prepayment, and (c) proceeds of the Special Tax dedicated to Pay-As-You-Go Expenditures. In no case, shall the Future Facilities Costs be less than zero.

"Previously Issued Improvement Area No. 1 Bonds" means all Outstanding Improvement Area No. 1 Bonds that have been issued by Improvement Area No. 1 prior to the date of prepayment.

1. Prepayment in Full

The Special Tax obligation of an Assessor's Parcel of Developed Property, Final Map Property, or Undeveloped Property may be prepaid and permanently satisfied as described herein; provided that there are no delinquent installments of the Special Tax with respect to such Assessor's Parcel at the time of prepayment. An owner of an Assessor's Parcel intending to prepay the Special Tax obligation shall provide the CFD Administrator with written notice of intent to prepay. Within 45 days of receipt of such written notice, the CFD Administrator shall notify such owner of the prepayment amount for such Assessor's Parcel. Prepayment must be made not less than 75 days prior to the next occurring date that notice of redemption of Outstanding Improvement Area No. 1 Bonds, if any. Proceeds of such prepayment may be given to the Trustee pursuant to the Indenture. If a prepayment is made prior to the issuance of Improvement Area No. 1 Bonds, the Redemption Premium, Interest Amount, Reserve Fund Credit and Capitalized Interest Credit as calculated below, shall be zero. The CFD Administrator may charge the property owner requesting a prepayment calculation a fee for providing this service.

The Special Tax Prepayment Amount (defined below) shall be calculated as summarized below (capitalized terms as defined below):

Bond Redemption Amount

Plus Future Facilities Amount

plus Redemption Premium

plus Interest Amount

plus Administrative Fees and Expenses

less Reserve Fund Credit

less Capitalized Interest Credit

Total: equals Special Tax Prepayment Amount

As of the proposed date of prepayment, the Special Tax Prepayment Amount (defined below) shall be calculated by the CFD Administrator as follows:

Step Number:

1. Confirm that no Special Tax delinquency apply to such Assessor's Parcel, and if delinquencies are applicable compute all amounts due, including interest and penalties.

- 2. For Assessor's Parcels of Developed Property compute the Assigned Special Tax and Backup Special Tax. For Assessor's Parcels of Final Map Property and Undeveloped Property, compute the Assigned Special Tax and Backup Special Tax for that Assessor's Parcel as though it was already designated as Developed Property, based upon the building permits expected to be issued for that Assessor's Parcel.
- 3. a. Divide the Assigned Special Tax computed pursuant to Step 2 by the total estimated Assigned Special Tax for Improvement Area No. 1 based on the Special Tax which could be charged in the current Fiscal Year on all expected development through Buildout of Improvement Area No. 1
 - b. Divide the Backup Special Tax computed pursuant to Step 2 by the total estimated Backup Special Tax for Improvement Area No. 1 based on the Special Tax which could be charged in the current Fiscal Year on all expected development through Buildout of Improvement Area No. 1
 - c. Determine which quotient computed pursuant to Step 3.a or 3.b is larger (the "Maximum Special Tax Percentage").
- 4. Multiply the Maximum Special Tax Percentage by the Outstanding Improvement Area No. 1 Bonds to compute the principal amount of Outstanding Improvement Area No. 1 Bonds to be redeemed (the "Bond Redemption Amount").
- 5. Compute the Future Facilities Costs.
- 6. Multiply the Maximum Special Tax Percentage by the total Future Facilities Costs to compute the Future Facilities amount to be prepaid (the *"Future Facilities Amount"*).
- 7. Multiply the Bond Redemption Amount computed pursuant to Step 4 by the applicable redemption premium, if any, on the Outstanding Improvement Area No. 1 Bonds to be redeemed (the "Redemption Premium") determined by reference to the Indenture.
- 8. Compute the amount needed to pay interest on the Bond Redemption Amount from the first bond interest and/or principal payment date following the current Fiscal Year until the earliest redemption date for the Outstanding Improvement Area No. 1 Bonds (the "Interest Amount").
- 9. Verify the administrative fees and expenses, including the costs of computation of the prepayment, the costs to invest the prepayment proceeds, the costs of redeeming the Outstanding Improvement Area No. 1 Bonds, and the costs of recording any notices to evidence the prepayment and the redemption (the "Administrative Fees and Expenses").
- 10. If reserve funds for the Outstanding Improvement Area No. 1 Bonds held under the Indenture, if any, are at or above 100% of the then reserve requirement (as required by the Indenture) on the prepayment date, a reserve fund credit shall be calculated as a reduction in the applicable reserve requirement for the Outstanding Improvement Area No. 1 Bonds to be redeemed pursuant to the prepayment (the "Reserve Fund Credit"). No Reserve Fund Credit shall be granted if reserve funds are below 100% of the applicable reserve requirement on the prepayment date or if the Reserve Fund is satisfied by a credit instrument rather than cash funded.
- 11. If any capitalized interest for the Outstanding Improvement Area No. 1 Bonds will not have been

expended at the time of the first interest and/or principal payment following the current Fiscal Year, a capitalized interest credit shall be calculated by multiplying the Maximum Special Tax Percentage by the expected balance in the capitalized interest fund after such first interest and/or principal payment (the "Capitalized Interest Credit").

- 12. The Special Tax prepayment is equal to the sum of the amounts computed pursuant to Steps 4, 6, 7, 8 and 9 less the amount computed pursuant to Steps 10 and 11 (the "*Prepayment Amount*").
- 13. From the Prepayment Amount, the amounts computed pursuant to Step 6 shall be used by the City to pay for Future Facilities Costs. The amounts computed pursuant to Steps 4, 7 and 8 shall be deposited into the appropriate fund as established under the Indenture and be used to redeem Outstanding Improvement Area No. 1 Bonds or make Debt Service payments. The amount computed pursuant to Step 9 shall be retained by the City for the payment of Administrative Fees and Expenses.

The Special Tax Prepayment Amount may be sufficient to redeem other than a \$5,000 increment of Outstanding Improvement Area No. 1 Bonds. In such cases, the increment above \$5,000 or integral multiple thereof will be retained in the appropriate fund established under the Indenture to be used with the next prepayment of Outstanding Improvement Area No. 1 Bonds or to make Debt Service payments.

Current year Special Taxes that are not yet paid will remain outstanding and will be collected in the manner billed. With respect to any Assessor's Parcel that is prepaid, the CFD Administrator shall cause a suitable notice to be recorded in compliance with the Act to indicate the prepayment of the Special Tax and the obligation of such Assessor's Parcel satisfied.

Notwithstanding the foregoing, no prepayment will be allowed unless the Maximum Special Tax that may be levied on Taxable Property both prior to and after the proposed prepayment is at least 1.1 times the maximum annual Debt Service on all Outstanding Improvement Area No. 1 Bonds plus annual Administrative Expenses, as reasonably estimated by the CFD Administrator.

2. Prepayment in Part

The Special Tax may be partially prepaid, provided that a partial prepayment may be made only after all authorized Improvement Area No. 1 Bonds have been issued and only for Assessor's Parcels of Developed Property, Final Map Property and Undeveloped Property and only if there are no delinquent Annual Special Taxes with respect to such Assessor's Parcel at the time of partial prepayment. The amount of the prepayment shall be calculated as in Section I.1; except that a partial prepayment shall be calculated by the CFD Administrator according to the following formula:

$$PP = P_E \times F$$
.

These terms have the following meaning:

PP = the partial prepayment

P_E = the Special Tax Prepayment Amount calculated according to Section I.1

F = the percentage of the Special Tax Prepayment Amount calculated according to Section I.1 to be prepaid.

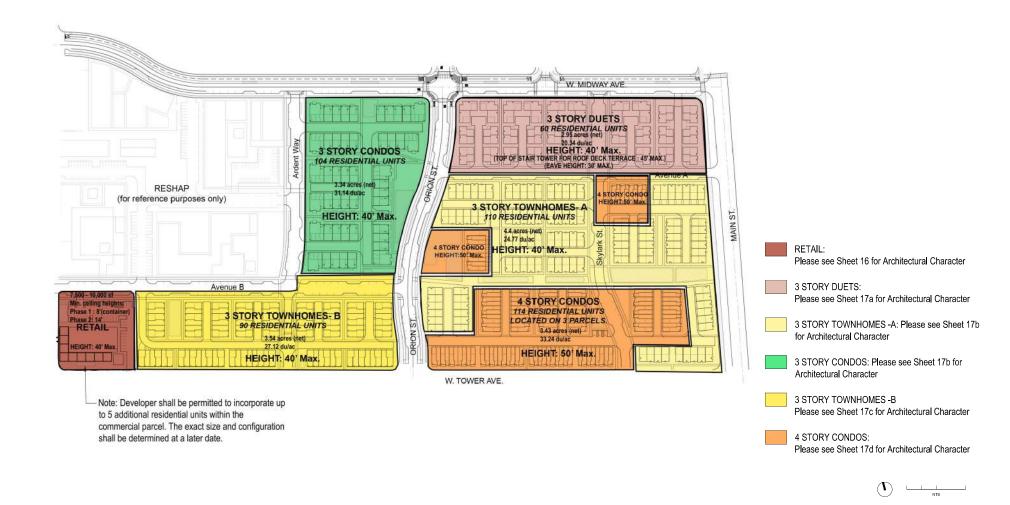
The Special Tax partial prepayment amount must be sufficient to redeem at least a \$5,000 increment of Bonds.

The owner of any Assessor's Parcel who desires such partial prepayment shall notify the CFD Administrator of such owner's intent to partially prepay the Special Tax and the percentage by which the Special Tax shall be prepaid. The CFD Administrator shall provide the owner with a statement of the amount required for the partial prepayment of the Special Tax for an Assessor's Parcel within 45 days of the request and may charge a fee for providing this service. With respect to any Assessor's Parcel that is partially prepaid, the CFD Administrator shall (i) distribute the prepayment funds remitted according to Section I.1, and (ii) indicate in the records of Improvement Area No. 1 that there has been a partial prepayment of the Special Tax and that a portion of the Special Tax with respect to such Assessor's Parcel, equal to the outstanding percentage (1.00 - F) of the remaining Maximum Special Tax, shall continue to be levied on such Assessor's Parcel pursuant to Section D.

J. TERM

The Special Tax shall be levied and collected as needed to fund the Annual Special Tax Requirement for up to 40 years from the initial levy of the Special Tax. In any event no Special Tax shall be levied for CFD. No. 25-1 after the 2064/65 Fiscal Year.

ATTACHMENT A



WEST MIDWAY

LAND USE DIAGRAM & BUILDING HEIGHTS











