



OFFICE OF THE CONTROLLER
CITY AND COUNTY OF SAN FRANCISCO

Greg Wagner
Controller

ChiaYu Ma
Deputy Controller

AFFIDAVIT OF PUBLICATION ON CITY WEBSITE

Keith Sevigny, the undersigned, hereby certifies that the attached Notice of TEFRA Hearing (Notice) was published on the Public Forms & Notices page maintained by the Controller's Office at the following Web address:

[Sequoia Living TEFRA Notice 5.8.2025.pdf](#)

The TEFRA section of the Controller's Public Forms & Notices page is listed on the City's primary public website for Public Notices at the following web address:

[Tax Equity & Fiscal Responsibility Act Hearing Notices \(TEFRA\) | SF.gov](#)

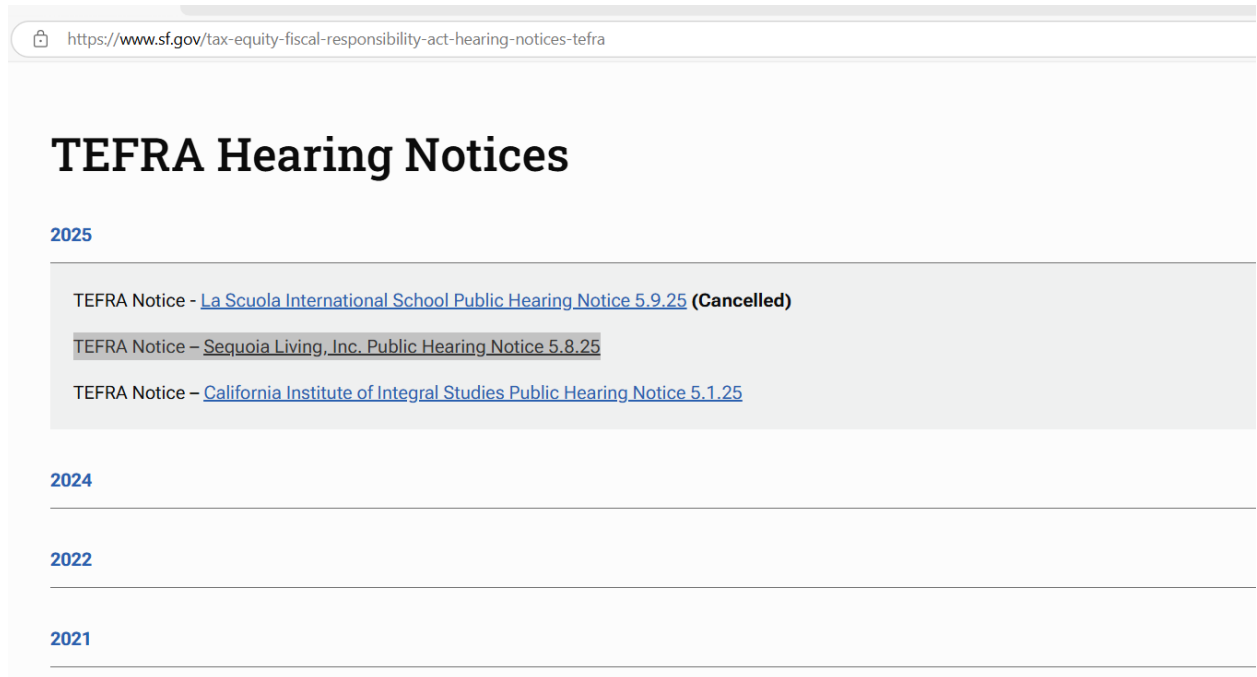
The Notice was posted on May 8, 2025, and was maintained continuously on the website until May 15, 2025. A copy of a screen shot of the notice is attached as Exhibit A.

Executed on May 16, 2025 in San Francisco, California.

Keith Sevigny

Keith Sevigny

Exhibit A – Screen Shots of Posted TEFRA Notice

A screenshot of a web browser displaying the "TEFRA Hearing Notices" page. The browser's address bar shows the URL "https://www.sf.gov/tax-equity-fiscal-responsibility-act-hearing-notices-tefra". The page has a light gray background with a white header area containing the title "TEFRA Hearing Notices" in a large, bold, black font. Below the title, there are four horizontal sections, each representing a year: 2025, 2024, 2022, and 2021. The 2025 section is highlighted with a light gray background and contains three entries: "TEFRA Notice - [La Scuola International School Public Hearing Notice 5.9.25](#) (Cancelled)", "TEFRA Notice - [Sequoia Living, Inc. Public Hearing Notice 5.8.25](#)", and "TEFRA Notice - [California Institute of Integral Studies Public Hearing Notice 5.1.25](#)". The 2024, 2022, and 2021 sections are currently empty.

https://www.sf.gov/tax-equity-fiscal-responsibility-act-hearing-notices-tefra

TEFRA Hearing Notices

2025

TEFRA Notice - [La Scuola International School Public Hearing Notice 5.9.25](#) (Cancelled)

TEFRA Notice - [Sequoia Living, Inc. Public Hearing Notice 5.8.25](#)

TEFRA Notice - [California Institute of Integral Studies Public Hearing Notice 5.1.25](#)

2024

2022

2021

https://media.api.sf.gov/documents/Sequoia_Living_TEFRA_Notice_5.8.2025.pdf

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CITY AND COUNTY OF SAN FRANCISCO

**NOTICE OF PUBLIC HEARING PURSUANT TO SECTION 147(F) OF THE
INTERNAL REVENUE CODE OF 1986, AS AMENDED, REGARDING THE
PROPOSED ISSUANCE OF NOT TO EXCEED \$165,000,000 OF TAX-EXEMPT
OBLIGATIONS BY CALIFORNIA STATEWIDE COMMUNITIES DEVELOPMENT
AUTHORITY ON BEHALF OF SEQUOIA LIVING, INC.**

NOTICE IS HEREBY GIVEN that on May 15, 2025 at 3:00 p.m., a public hearing as required by Section 147(f) of the Internal Revenue Code of 1986, as amended ("Code") will be held by the City and County of San Francisco Controller's Office of Public Finance ("OPF"), located at 1 Dr. Carlton B. Goodlett Place, Room 338, San Francisco, California 94102, with respect to the proposed issuance by the California Statewide Communities Development Authority ("Issuer") of qualified 501(c)(3) bonds, as defined in Section 145 of the Code, for senior living and related facilities, in one or more series from time to time pursuant to a plan of finance, in an amount not to exceed \$165,000,000 ("Bonds"). A portion of proceeds of the Bonds are expected to be used by Sequoia Living, Inc., a California nonprofit benefit corporation and an organization described in Section 501(c)(3) of the Code ("Borrower") to (i) finance a portion of the costs of or reimbursement for the acquisition, construction, renovation, equipping and furnishing of facilities known as The Sequoias San Francisco, in connection with the provision of senior residential and care services and located generally at 1400 Geary Blvd., San Francisco, California 94109 ("Facility"), in an aggregate principal amount not to exceed \$60,000,000; and (ii) refinance prior obligations issued for the benefit of the Borrower, which financed and refinanced the costs of the acquisition, construction, renovation, equipping and furnishing of the Facility, in an aggregate principal amount not to exceed \$22,000,000 (collectively, the "Sequoias Project"). The Facility is owned and operated by the Borrower.

In addition, it is expected that the balance of proceeds of the Bonds will be used for a variety of capital projects, including (i) costs of or reimbursement for the acquisition, construction, renovation, equipping and furnishing of facilities known as (a) The Sequoias at Portola Valley, located at 501 Portola Road, Portola Valley, California 94028 ("Sequoias at Portola Valley"); (b) The Tamalpais Marin, located at 501 Via Casitas, Greenbrae, California 94904 ("Tamalpais Marin"); ; and (c) Viamonte Walnut Creek, located at 2801 Shadelands Drive, Walnut Creek, California 94598 ("Viamonte"); ; and (ii) refinancing prior obligations issues for the benefit of the Borrower, which financed and refinanced the costs of the acquisition, construction, renovation, equipping and furnishing of (a) Sequoias at Portola Valley; and (b) Tamalpais Marin. Federal tax law does not require the City and County of San Francisco to approve the issuance of the Bonds for these other purposes. The total of the amounts listed above for the financing and refinancing of capital projects at the Sequoias Project, the Sequoias at Portola Valley, Tamalpais Marin and Viamonte exceeds the maximum total aggregate principal amount of the Bonds that may be issued to finance such projects; nevertheless, the maximum total aggregate principal amount of the Bonds to be authorized by the City shall not exceed is \$165,000,000.

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https://media.api.sf.gov/documents/Sequoia_Living_TEFRA_Notice_5.8.2025.pdf

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...the maximum total aggregate principal amount of the Bonds that may be issued to finance such projects; nevertheless, the maximum total aggregate principal amount of the Bonds to be authorized by the City shall not exceed is \$165,000,000.

The public hearing will begin promptly at 3:00 p.m. and OPF will close the hearing at 3:10 p.m. if no public comments are received by that time. The public hearing is intended to comply with the public approval requirement of Section 147(f) of the Code, and the Treasury Regulations promulgated thereunder.

4146-7711-9579.4

The Public Hearing will be held via teleconference only, accessible by dialing the following toll-free telephone number, and then entering the access code:

Toll-Free Telephone Number: 1-877-402-9753

Access Code: 8883457#

Interested persons wishing to express their views on the issuance of the Bonds or on the nature and location of the Sequoias Project proposed to be financed or refinanced may participate in the public hearing by telephone or, prior to the time of the hearing, by submitting written comments, which must be received prior to the public hearing, to the City's Office of Public Finance as follows: PublicFinance@sfgov.org.

Neither the full faith and credit nor the taxing power, if any, of the City and County of San Francisco ("City"), the Issuer and its members, the State of California ("State") or any other political corporation, subdivision or agency of the State, is pledged to the payment of the principal of, premium, if any, or interest on the Bonds, nor shall the City, the Issuer and its members, the State, or any other political corporation, subdivision or agency of the State be liable or obligated to pay the principal of, premium, if any, or interest on the Bonds.

Dated: May 8, 2025