

# CDFA BROWNFIELDS TECHNICAL ASSISTANCE PROGRAM



## CDFA Brownfields Financing Toolkit

Council of Development Finance Agencies

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# CDFA BROWNFIELDS TECHNICAL ASSISTANCE PROGRAM

## BROWNFIELDS FINANCING TOOLKIT



The *CDFA Brownfields Financing Toolkit* provides communities with an easy-to-use, best practices resource on brownfields redevelopment. The toolkit approach to development finance brings together the best of these financing concepts and techniques to provide a comprehensive response to capital and resource needs. This guide is intended to provide information to communities interested in identifying potential financing tools for the remediation and redevelopment of contaminated brownfield sites. The following development finance tools are covered in this guide.

- [Revolving Loan Funds](#)
- [Tax Increment Financing](#)
- [Bond Financing](#)
- [New Markets Tax Credits](#)
- [EB-5 Visa Program](#)

The *CDFA Brownfields Financing Toolkit* is one component of the [CDFA Brownfields Technical Assistance Program](#), which is funded by a five-year grant from the U.S. Environmental Protection Agency (EPA) to provide assistance to communities throughout the country that are looking to finance the redevelopment of brownfield sites. To learn more about how your community can receive free technical assistance, visit [www.cdfa.net](http://www.cdfa.net).

The resources identified in the “From the CDFA Online Resource Database” sections of this document can be accessed on the CDFA website by typing the title of the resource into the *Online Resource Database* search bar located in the top-right corner of [www.cdfa.net](http://www.cdfa.net).

To access the digital version of the Toolkit, scan the QR code at right:



# Brownfields Basics

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The EPA defines brownfields as “real property, the expansion, redevelopment, or reuse of which may be complicated by the presence or potential presence of a hazardous substance, pollutant, or contaminant.”<sup>1</sup> A brownfield is any former industrial or commercial site that is abandoned or underutilized and suffers from real or perceived contamination. Left alone, brownfields are detriments to the landscape and environment, negatively affecting property values and deterring investment in nearby areas. They are typically the last urban sites to be redeveloped due to uncertainties related to contaminants and costs, and challenges posed by potential environmental liability issues and project financing. For communities that can overcome these challenges, the payoff can be very rewarding.

Sustainable community planning encourages the cleanup and reuse of these areas for the community’s long term environmental and economic health. Cleanup of brownfields can increase tax base and property values, create jobs, and spur local investment. Communities can take advantage of federal funds to assist with the assessment and cleanup of brownfield sites. Many states have established financing programs that have been combined with federal grants and resources to revitalize abandoned sites and return them to productive use. These financing programs often require specific and well-defined regulatory structures to work effectively.

## Site Assessment and Cleanup

Site Assessment is the first step in understanding the potential contamination of a site and planning for its remediation, or cleanup. Each brownfield site undergoes multiple phases of site assessment, beginning with Phase I, which typically involves interviews regarding former site use, along with thorough review of documents and public records to determine expected contamination. Phase II Assessments require field based sampling and analysis to identify the type and concentration of existing pollutants, while Phase III and IV Assessments involve acquiring cleanup cost estimates and remediation planning for the site. Assessment grants are available through the EPA to fund brownfields inventories, planning, environmental assessments, and community outreach.<sup>2</sup>

The complexity of Site Cleanup can vary widely and the goals for cleanup are determined by existing regulations. Activities may involve soil, surface water or groundwater removal or encapsulation of contaminants. Entities that did not contribute to the contamination may perform remediation through a voluntary cleanup program, which may limit liability associated with newly discovered contamination after cleanup. A cleanup may be considered complete when local, state, or federal regulatory closure (e.g., a No Further Action Letter) is issued.<sup>3</sup> Competitive Cleanup grants are awarded by the EPA in amounts up to \$200,000 and with a performance period of three years.

Communities should contact their [Regional EPA Offices](#) to learn about additional state and local financing sources to assist with Brownfields Assessment and Cleanup.

## Federal Brownfields Site Assessment and Cleanup Resources

- [EPA Brownfields Assessment Grants](#)
- [EPA Targeted Brownfields Assessments- The Basics](#)
- [EPA Brownfields Cleanup Grants](#)
- [New Jersey Institute of Technology \(EPA Regions 1 & 3\)](#)
- [Center for Creative Land Recycling \(EPA Regions 2, 4, 9, & 10\)](#)
- [Kansas State University Technical Assistance to Brownfields \(EPA Regions 5, 6, 7, & 8\)](#)



## Revolving Loan Funds

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Revolving Loan Funds (RLFs) are a widely used financing tool, but they are sometimes misunderstood or underutilized. RLFs are a gap-financing measure that can effectively address a wide range of economic development, including infrastructure, small businesses, and redevelopment. An RLF is a self-replenishing pool of money, utilizing interest and principal payments on old loans to issue new ones. While the majority of RLFs support local businesses, some target specific areas, such as health care, infrastructure development, and environmental cleanup.

An RLF provides access to a flexible source of capital that can be used in combination with more conventional lending sources. The loan often fills a gap between the amount a borrower can obtain in the private market and the amount needed to start or expand a project. For example, a borrower may obtain 60 percent to 80 percent of project financing from other sources.

Quality RLFs issue loans at market or otherwise competitive and attractive rates. RLFs must be able to generate enough of an interest rate return to replenish the fund for future loan allocations. With competitive rates and flexible terms, a RLF provides access to new financing sources for the borrower, while lowering overall risk for participating institutional lenders.

A wide variety of capital sources can be used to establish an RLF. General obligation bond issuances, dedicated tax revenues, federal grants, bank funds (often through Community Reinvestment Act credits), foundation grants and investments, and high net worth individuals are all common sources of initial fund capital. Once established, an RLF with the right interest rate and risk portfolio can be self-sustaining, providing access to capital to projects in perpetuity.

### Brownfields & Revolving Loan Funds

The actual shape of loan programs varies dramatically from one project to the next. At times a public entity at the municipal or state level may provide capital, underwriting, administration, and servicing, maintaining sole financial control of the remediation project. Loan programs can be specifically earmarked for contaminated sites or brownfields, or they can be part of a job creation, urban revitalization, or other related loan program. The private sector can also contribute debt financing to [redevelopment] projects, either independently or as part of a Public-Private Partnership with related governmental entities. The public sector can leverage these private funds through a number of credit enhancement programs, strengthening areas of weakness identified by traditional lenders through indirect or conditional investments and reserves.

[A] potential application of loan funds entails the investment in renovations, construction, machinery and equipment, or furniture and fixtures. These project assets can serve as collateral for the deal, and this type of project may not require supplemental security or credit enhancements. Communities typically deploy loan funds toward final development work, utilizing grant funds or developer equity for site assessment, cleanup, and professional fees.

— The World Bank, *Financing Mechanisms for Addressing the Remediation of Site Contamination*<sup>4</sup>

## Revolving Loan Fund Resources from the CDFA Online Resource Database

<b><u>Resource:</u></b>	<b><u>Resource Description:</u></b>
<a href="#"><u>Unlocking Brownfields Redevelopment: Establishing a Local Revolving Loan Fund Program</u></a>	This EPA publication explains the basics of setting up and successfully administering a local brownfield revolving loan fund.
<a href="#"><u>Banking on Infrastructure: Enhancing State Revolving Funds for Transportation</u></a>	Brookings highlights state and federal infrastructure programs that stretch public and private dollars and support the kind of infrastructure investments necessary to build the "Next Economy".
<a href="#"><u>Tips for Managing Your RLF</u></a>	This article provides fund capitalization, committee, program marketing, and loan servicing tips for revolving loan funds.
<a href="#"><u>Revolving Loan Fund Sources</u></a>	This resource created by Urban Capital Solutions lists several federal, state, and private RLF capitalization sources with links to their specific programs.
<a href="#"><u>Revolving Loan Fund Reference Guide</u></a>	This guide addresses how to design and manage an RLF program that complements economic development strategies.

### Revolving Loan Fund Representative Case Study State of Washington

The Washington Department of Commerce manages a fund targeting brownfields that present an immediate danger to health and the environment.<sup>5</sup> Eligible applicants include government entities, site owners, and developers. Loan funds do not cover pre-remediation site assessments, which are important to the underwriting of the projects. Washington's interest rates are fixed at below-market rates. Loans range in size from \$10K to \$450K, with no minimum equity.

Rainier Court, an urban mixed-use district located in Seattle's Rainier Valley, leveraged under \$1M in Brownfields Revolving Loan Funds from the State of Washington with city financing and multiple grants, earning the project a national award for excellence in brownfield redevelopment in 2005.<sup>6</sup> The seven-acre site had previously been a public health and safety concern due to illegal dumping, abandonment of vehicles, hazardous chemicals, and leaking underground storage tanks. After development, the project yielded nearly 400 units of low-income and senior housing and created an estimated 50 permanent jobs.<sup>7</sup>

— The World Bank, *Financing Mechanisms for Addressing the Remediation of Site Contamination*<sup>8</sup>

# Tax Increment Financing

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Tax Increment Financing (TIF) allows local governments to invest in infrastructure and other improvements and pay for them by capturing the increase in property tax revenues and, in some states, other types of incremental taxes. The increase in taxes generated by the enhancements, also known as increment, is used to pay the public debt or costs incurred while make these improvements. TIF can work in communities of all sizes and can be used to finance a variety of costs pertaining to public infrastructure, land acquisition, demolition, utilities, planning costs, and other improvements.

TIF is generally used to address blight and deterioration, promote neighborhood stability, and inspire district oriented economic development or redevelopment. While each state's TIF statute is different, common policy goals and objectives exist. Often TIF is used to advance development priorities, such as:

- Targeted investment and redevelopment;
- Developing industry niches;
- Bring goals, services, and/or housing to underserved, underdeveloped areas;
- Restoring brownfield sites to productive use; and
- Creating or retaining jobs and supporting industrial development.

## Brownfields & Tax Increment Financing

Tax increment finance is one of the most applicable tools available for brownfield redevelopment. TIF is a targeted financing tool and incentive that can catalyze private investment by leveraging public contributions. The ability of a governmental unit to directly leverage public money for private engagement allows for a host of options beyond traditional financing sources.

With TIF in place, project developers can think beyond clean-up by focusing both current and future tax revenues towards paying down the costs of clean-up as well as new development. It also allows the government to direct tax revenue in a manner that targets major contamination, while incentivizing sustainability and green development.

TIF is also a performance-driven tool: future tax revenues are only generated if actual clean-up occurs. Project partners and stakeholders are held to a high level of performance and the tool affords considerable oversight, transparency and due diligence. In public finance, these elements are critical when dealing with significantly troublesome projects, such as site contaminated industrial sites.

TIF is perhaps most applicable for site contamination clean-up because it is justifiable and forward looking. TIF recognizes the deficiencies in the markets surrounding site contaminated properties and addresses the core of these issues. TIF is often used simply as a lever to catalyze interest and demand in a development site. The ability to address market forces through a relatively benign tool like TIF, allows for great potential and longer term opportunity.

— The World Bank, *Financing Mechanisms for Addressing the Remediation of Site Contamination*<sup>9</sup>

## Tax Increment Financing Resources from the CDFA Online Resource Database

### **Resource:**

### **Resource Description:**

[How the Tool Works: Tax Increment Finance](#)

This report from Evans Paul with the Northeast-Midwest Institute looks at how states can modify their TIF statutes to promote brownfields redevelopment using TIF and presents a step-by-step process allow TIF to be used for these types of projects.

[Using Tax Increment Financing for Brownfields Redevelopment](#)

TIF is often the most effective incentive in closing project financing gaps for brownfield projects, however isn't often used to finance brownfield projects because of the need for up-front financing and the bond market looking for projects that are "done deals". Some states have been able to find creative ways to structures these deals. This paper makes recommendations to enhance the use of TIF for these types of projects.

[Recommended Practices: Effective Tax Increment Financing Program Management](#)

CDFA has developed these recommended practices that address TIF, highlights some of the common procedural elements that development finance professionals face and provides guidance on strategies for maximizing TIF project success.

[Understanding the "But For" Test](#)

Wisconsin Department of Revenue outlines the standard for the "but for" test as it relates to TIF.

[CDFA Tax Increment Finance Best Practices Reference Guide](#)

The reference guide addresses what TIF is, why it should be used and how best to apply the TIF tool. The reference guide also highlights TIF projects from across the country and discusses how they can be applied to address many common economic development issues.

[CDFA Tax Increment Finance Resource Center](#)

The resource center provides links to hundreds of additional reports, presentations, and sample documentation for TIF, and also links to the TIF State-by-State Map, which includes information on TIF authorizing legislation in each state.



## Tax Increment Financing Representative Case Study

### City of Atlanta, GA

The 138-acre site of Atlantic Steel's former fabrication facility created a blight within Atlanta's Midtown district.<sup>10</sup> The City of Atlanta dedicated TIF proceeds within the district and other financing tools, such as water and sewer bonds, in combination with federal and private funds. The total development project surpassed \$2B for the complete remediation and redevelopment of the site. Over \$200M of this financing was raised through TIF bonds.

The final Atlantic Station project involves the creation of a dense, multi-use development focused on smart growth. The finance team faced two significant challenges.<sup>11</sup> To address the first issue, Georgia's Redevelopment Powers Act was amended to permit interest capitalization on the bonds from 18 months to up to 42 months.

There was a risk that development efforts could wane over the course of the project such that the incremental tax revenues received would be insufficient to pay scheduled bond debt service. This risk could not be mitigated without private developer guarantees. Unfortunately, such guarantees could jeopardize the exclusion of bond interest from federal income taxation. To enhance the creditworthiness and preserve the tax-exempt status of the bonds, the plan recommended that the city create a special district coterminous with the tax allocation bond district. As part of this arrangement, the city agreed to levy a tax on all special district taxpayers if pledged incremental tax revenues were ever insufficient to pay bond debt service. With additional security from this "generally applicable tax," rather than from private developer payment guarantees, the federally tax-exempt status of the bonds would not be affected.

— The World Bank, *Financing Mechanisms for Addressing the Remediation of Site Contamination*<sup>12</sup>

## Bond Financing

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Bond financing is a bedrock tool of the economic development community and is the foundation for all public financing. The Tax Reform Act of 1986 distinguishes between two types of municipal bonds: Governmental Bonds and Private Activity Bonds (PABs). The CDFA *Practitioner's Guide to Economic Development Finance*<sup>13</sup> describes the types of bonds:

### **Governmental Bonds**

Government Bonds, unlike PABs, may be used for many public purposes (e.g., highways, schools, bridges, sewers, jails, parks, government equipment and buildings, etc.) except that private entities may not significantly use, control or own the facilities financed. Governmental Bonds benefit the general public in contrast to PABs that benefit private persons. Governmental Bonds should address an “essential governmental function.” Whether bonds are Governmental Bonds or PABs depends on whether there is an arrangement that will likely transfer the benefits of tax-exempt financing to private (nongovernmental) persons.

### **Private Activity Bonds**

PABs are issued for the benefit of private individuals or entities and can only be issued on a tax-exempt basis if they are “Qualified PABs.” In order to be qualified, a bond must first meet the definitions of private activity. These include being issued for a substantial private purpose and/or being structured as a private loan. Additionally, the bonds must be issued for a specific purpose defined in the tax code as worthy of receiving the benefit of tax-exempt interest. The Internal Revenue Code (IRC) of the U.S. permits the financing of numerous categories of facilities as qualified PABs. The most relevant to brownfield remediation are found in the table below.

U.S. PAB Category	Description
Exempt Facility Bonds	Issued for private infrastructure projects, including: airports, docks, wharves and rail; water and sewage; solid waste; certain energy projects; and more.
Redevelopment Bonds	Issued for redevelopment projects in blighted areas, including contaminated sites.
501(c)(3) Bonds	Issued for charitable nonprofits, including hospitals and educational institutions, for facilities and certain other costs.
Small Issue Bonds for Manufacturing	Issued for eligible, small manufacturers to expand their manufacturing facilities.

With each of the above categories of qualified PABs, bonds must meet very specific requirements of the United States IRC. These requirements could vary in a global application of this concept, depending on national economic, social, and legal conditions. Qualified PABs are used either entirely or partially for private purposes and are given federal tax-exempt status.

## Brownfields & Bond Financing

In the U.S., bond financing is one of the most highly used forms of financing to address brownfield redevelopment. One of the reasons bond financing is so applicable is because of the flexibility of this tool. Bond proceeds can be used to finance the costs associated with site remediation as well as to create brownfield-specific loan programs. In addition, bonds are often paired with other financing mechanisms, such as tax increment finance and tax credits, because of their reliability and flexibility.

— The World Bank, *Financing Mechanisms for Addressing the Remediation of Site Contamination*<sup>14</sup>

## Bond Financing Resources from the CDFA Online Resource Database

### **Resource:**

### **Resource Description:**

[How the Tool Works Qualified Private Activity Bonds](#)

This document provides an overview of PABs, different types of PABs, model programs, the roles of various participants in the PAB process, and more.

[Bonds & Borrowing: An Introduction](#)

Vicki Elmer with UC Berkeley provides a general overview of bonds and examines the decisions necessary to borrow. Different types of bonds are described along with the bond issuance process.

[CDFA Built by Bonds](#)

This unique publication demonstrates the proven efficiency of tax-exempt bonds by addressing topics that include the potentially \$53 billion in lost issuance and by providing 150 snapshots of projects financed with tax-exempt bonds.

[Recommended Practices: Effective Industrial Development Bond Program Management](#)

A successful IDB programs requires effective management, marketing and oversight. This publication lists a set of guiding principles when developing or implementing an IDB program.

[Getting to Know EMMA](#)

MSRB released this fact sheet to help state and local government officials utilize EMMA to better evaluate municipal financing options, comply with disclosure requirements, and communicate with investors.

[CDFA Development Bond Finance Reference Guide](#)

This guide provides a solid foundation for understanding the use of tax-exempt bonds, with an emphasis on small issue industrial development bonds and 501(C)(3) bonds.

## Bond Financing Representative Case Study State of Oregon

Oregon's Brownfields Program is available to provide financing for the full range of environmental activities—assessment through cleanup—associated with brownfields redevelopment. The department manages two brownfields financing funds: the \$9.5M Oregon Brownfields Redevelopment Fund, funded by proceeds from the sale of state revenue bonds; and the \$2.85M Oregon Coalition Brownfields Cleanup Fund, capitalized through a revolving loan grant from the U.S. Environmental Protection Agency. Both programs are primarily revolving loan programs, with a maximum term of 20 years; however limited grants can be awarded on a case-by-case basis for publicly-owned projects, depending on a financial analysis of the applicant's debt capacity and public benefits of the redevelopment project.<sup>15</sup>

In 2004, the Port of Portland acquired a 700-acre abandoned site which once housed an aluminum smelter.<sup>16</sup> Partnering with Alcoa, FedEx Ground, Business Oregon, the Oregon Department of Environmental Quality, and other entities, the Port remediated and redeveloped the site to create recreation, wetlands, and natural space in addition to a regional distribution hub and industrial park. Estimates for job creation surpass 3,500 positions upon the completion of redevelopment.

— Business Oregon

## New Markets Tax Credits

The New Markets Tax Credits (NMTC) program expands the availability of credit, investment capital, and financial services to underserved urban and rural communities. Administered by the Community Development Financial Institutions (CDFI) Fund under the U.S Department of the Treasury, the NMTC provides a 39 percent federal tax credit to investors over a seven year period, while providing significant gap financing. NMTC program applications awarded to communities whose poverty rate is above 20%, or whose area median income (AMI) is less than 80 percent of the average AMI. Tax credits are allocated for distribution to certain qualifying entities, known as Community Development Entities (CDEs) and can be combined with other sources of capital to finance commercial redevelopment projects.

### Brownfields & New Markets Tax Credits

Brownfield developers can benefit greatly from New Markets Tax Credits. Projects can receive funding for a full range of redevelopment activities, including land acquisition, environmental remediation, demolition, site preparation, construction, renovation and infrastructure improvements. Involved CDEs can “package” funding sources together to help bolster the cleanup and redevelopment of brownfield projects including utilizing EPA Brownfield grants.

— The World Bank, *Financing Mechanisms for Addressing the Remediation of Site Contamination*<sup>17</sup>

### New Markets Tax Credit Resources from the CDFA Online Resource Database

<b><u>Resource</u></b>	<b><u>Resource Description</u></b>
<a href="#"><u>Novogradac NMTC Basic Overview</u></a>	Novogradac provides a brief overview of NMTC in this helpful introductory video.
<a href="#"><u>New Markets Tax Credits Overview</u></a>	Timothy Karp from Chase Bank provides insight on NMTC and the NMTC documentation process.
<a href="#"><u>State New Markets Tax Credit Programs</u></a>	This interactive map from Novogradac highlights each of the NMTC state programs.
<a href="#"><u>50 Project - 50 States: NMTC Case Studies</u></a>	This report by the New Markets Tax Credit Coalition provides 50 case studies of this tax credit program.
<a href="#"><u>Creative Tax Credit Solutions</u></a>	Tony Smith with S.B. Friedman provides an in-depth look at how NMTCs are used, evaluated, leveraged and structured to impact community development.
<a href="#"><u>CDFA Tax Credit Reference Guide</u></a>	This guide walks through guidelines for due diligence and performance monitoring and details the primary tax credits available at the federal level.



## New Markets Tax Credits Representative Case Study

### Gateway Marketplace, MI

The Gateway Marketplace project was financed by the Michigan Economic Growth Authority, a loan from the General Retirement System of the City of Detroit and \$57.6 million in critical NMTC financing, provided by National New Markets Fund, Invest Detroit CDE, National Community Investment Fund, Wayne County-Detroit CDE, and Liberty Financial Services.

Located on a 36-acre brownfield site in a USDA designated food desert and surrounded by severely low-income census tracts, the project's anchor tenant is a 214,000 square foot Meijer supercenter that providing affordable groceries to local residents and will be the city's first new national grocery store in over two decades. It is estimated that Gateway Marketplace will bring more than \$1.7 million of annual sales to the community.

It is estimated that Gateway Marketplace will bring more than \$1.7 million of annual sales to the community. The project will provide much needed healthy and affordable food choices to a target market of 500,000 urban residents. This project will create over 300 construction jobs and almost 900 permanent jobs in a community with high unemployment.

— New Markets Tax Credit Coalition<sup>18</sup>

## EB-5 Visa Program

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The EB-5 Visa Program is a federal foreign direct investment, immigration, and regional economic development program that provides access to capital to U.S. businesses and creates American jobs at no expense to the American taxpayer. Globalization has spurred an unprecedented rise in wealth overseas, as well as increased the speed of capital between nations. By building immigration benefits into investment incentives, the EB-5 Program provides a welcome avenue for overseas wealth to be delivered to the U.S. economy – tapping into new opportunities and opening a new frontier of development finance programs.

### Brownfields & EB-5

Regional centers and private developers have begun turning to the EB-5 program for financing brownfield redevelopment in many US cities. Projects with environmental issues can be a concern to EB-5 investors since the foreign nationals have to make “at-risk” investments. In other words, if the project does not produce the required number of jobs within the two year period, the foreign national’s path to permanent residency could be derailed. EB5 investors will need to understand the risks that environmental investigation/remediation process may impact project viability. Environmental issues can increase costs that could make a project infeasible or delay project completion so that the requisite jobs may not be created or may be delayed. Thus, developers seeking EB-5 financing for contaminated property should discuss complications posed by environmental issues in the offering memorandum if the environmental conditions could pose material risks to timely project completion. Foreign nationals will want to retain advisors to help understand the environmental issues as part of their overall project and financial due diligence.

— Schnapf LLC<sup>19</sup>

### EB-5 Resources from the CDFA Online Resource Database

<b><u>Resource</u></b>	<b><u>Resource Description</u></b>
<a href="#"><b>The EB-5 Program as a Capital Access Tool</b></a>	Clem Turner of Homier & Law, P.C. discusses the basics behind the EB-5 program and methods in using the program as a tool to access capital.
<a href="#"><b>EB-5: Addressing the Financing Gap</b></a>	The article overviews the program and discusses EB-5's value as a gap finance tool for economic development.
<a href="#"><b>IIUSA Approved Best Practices</b></a>	Invest in the USA’s overview of best practices related to EB-5 and the Regional Center industry.

## EB-5 Financing Representative Case Study

### City of Cleveland, OH

The Flats East Bank development project is the largest private sector investment in Cleveland, OH since 1988. The City of Cleveland has historically had an under-developed waterfront as a result of the City's industrial past. However, developers saw potential to build a high density mixed-use project that offered a high level of connectivity to transportation arteries, close proximity to cultural and commercial hot spots, and waterfront access.

The Flats East Bank is located on 24 acres adjacent to Lake Erie, directly in the heart of the East Bank. The final project includes more than \$500 million in overall development. This development boasts a 450,000 square foot Class 'A' office tower, 150 room Aloft hotel, a health and fitness center, and eight new restaurants. The project was financed in part by \$45 million in EB-5 financing from 90 different foreign investors. Additional financing for the project came from bonds issued by the state and multiple local port authorities, as well as grant funding. The project has helped to create more than 1,800 new jobs.<sup>20</sup>

— Steve Strnisha, Cleveland International Fund

## End Notes

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