



November 5, 2015

Ms. Sheryl Bennett, Director of Administrative Services
City of Escondido
201 North Broadway
Escondido, CA 92025

Dear Ms. Bennett:

Subject: Recognized Obligation Payment Schedule

Pursuant to Health and Safety Code (HSC) section 34177 (m) (1) (A), the City of Escondido Successor Agency (Agency) submitted a Recognized Obligation Payment Schedule for the period January 1 through June 30, 2016 (ROPS 15-16B) to the California Department of Finance (Finance) on September 24, 2015. Finance has completed its review of the ROPS 15-16B.

Based on a sample of line items reviewed and application of the law, Finance made the following determinations:

- Item No. 9 – California Housing Finance Agency Loans in the amount of \$1,625,000 is not allowed. According to the Agency, the reserve amount requested is for a payment due in October 2016. The Agency wants to build a reserve to ensure Redevelopment Property Tax Trust Fund funds (RPTTF) will be available to make the payment due in October 2016. However, HSC section 34177 (b) allows the Agency to maintain reserves required by indentures, trust indentures, or similar documents governing the issuance of outstanding bonds. The statute does not currently recognize the authority to build reserves for all anticipated obligations, thus the creation of reserves for this purpose is not permissible.

In addition, based on a review of the Agency's self-reported cash balance form and previous County Auditor-Controller distribution reports, it appears there will be sufficient funds available to fund this obligation. However, should a shortfall occur, HSC section 34173 (h) (1) provides a mechanism for the Agency to make the required payment. Therefore, this item is not eligible for RPTTF funding on this ROPS.

Pursuant to HSC section 34186 (a) (1), the Agency was required to report on the ROPS 15-16B form the estimated obligations versus actual payments (prior period adjustment) associated with the January through June 2015 period (ROPS 14-15B). HSC section 34186 (a) (1) also specifies the prior period adjustment self-reported by the Agency is subject to review by the county auditor-controller (CAC). The amount of RPTTF approved in the table on the next page includes the prior period adjustment resulting from the CAC's review of the Agency's self-reported prior period adjustment.

Except for the item denied in whole or in part, Finance is not objecting to the remaining items listed on your ROPS 15-16B. If you disagree with Finance's determination with respect to any items on your ROPS 15-16B, except for those items which are the subject of litigation disputing Finance's previous or related determinations, you may request a Meet and Confer within five business days of the date of this letter. The Meet and Confer process and guidelines are available at Finance's website below:

http://www.dof.ca.gov/redevelopment/meet_and_confer/

The Agency's maximum approved RPTTF distribution for the reporting period is \$1,984,488 as summarized in the Approved RPTTF Distribution table below:

Approved RPTTF Distribution For the period of January through June 2016	
Total RPTTF requested for non-administrative obligations	3,566,590
Total RPTTF requested for administrative obligations	106,998
Total RPTTF requested for obligations on ROPS 15-16B	\$ 3,673,588
Total RPTTF requested for non-administrative obligations	3,566,590
<u>Denied Item</u>	
Item No. 9	(1,625,000)
Total RPTTF authorized for non-administrative obligations	\$ 1,941,590
Total RPTTF requested for administrative obligations	106,998
Total RPTTF authorized for administrative obligations	\$ 106,998
Total RPTTF authorized for obligations	\$ 2,048,588
ROPS 14-15B prior period adjustment	(64,100)
Total RPTTF approved for distribution	\$ 1,984,488

On the ROPS 15-16B form, the Agency reported cash balances and activity for the period January 1 through December 31, 2015. Finance will perform a review of the Agency's self-reported cash balances on an ongoing basis. Please be prepared to submit financial records and bridging documents to support the cash balances reported upon request. If it is determined the Agency possesses cash balances that are available to pay approved obligations, HSC section 34177 (l) (1) (E) requires these balances be used prior to requesting RPTTF.

Please refer to the ROPS 15-16B schedule used to calculate the total RPTTF approved for distribution:

<http://www.dof.ca.gov/redevelopment/ROPS>

Absent a Meet and Confer, this is Finance's final determination related to the enforceable obligations reported on your ROPS for January 1 through June 30, 2016. This determination only applies to items when funding was requested for the six-month period. Finance's determination is effective for this time period only and should not be conclusively relied upon for future ROPS periods. All items listed on a future ROPS are subject to review and may be denied even if it was not denied on this ROPS or a preceding ROPS. The only exception is for items that have received a Final and Conclusive determination from Finance pursuant to

HSC section 34177.5 (i). Finance's review of Final and Conclusive items is limited to confirming the scheduled payments as required by the obligation.

The amount available from the RPTTF is the same as the amount of property tax increment available prior to the enactment of the redevelopment dissolution statutes. Therefore, as a practical matter, the ability to fund the items on the ROPS with property tax is limited to the amount of funding available to the Agency in the RPTTF.

Please direct inquiries to Wendy Griffe, Supervisor, or Jared Smith, Lead Analyst, at (916) 445-1546.

Sincerely,



JUSTYN HOWARD
Program Budget Manager

cc: Ms. Joan Ryan, Assistant Finance Director, City of Escondido
Mr. Jon Baker, Senior Auditor and Controller Manager, San Diego County