DEPARTMENT OF FINANCE
OFFICE OF THE DIRECTOR

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March 7, 2019

Mr. Colin Tudor, Assistant City Manager
City of Claremont
207 Harvard Avenue
Claremont, CA 91711

Dear Mr. Tudor:

Subject: 2019-20 Annual Recognized Obligation Payment Schedule

Pursuant to Health and Safety Code (HSC) section 34177 (o) (1), the City of Claremont Successor Agency (Agency) submitted an annual Recognized Obligation Payment Schedule for the period of July 1, 2019 through June 30, 2020 (ROPS 19-20) to the California Department of Finance (Finance) on January 16, 2019. Finance has completed its review of the ROPS 19-20.

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

- Item No. 12 – Reinstated City Loan Repayment in the amount of $380,500 is partially allowed. It is our understanding the Agency requested the incorrect funding source for the loan payments. Per discussion with Agency staff and a review of the documentation provided, Finance has reclassified the requested amount of $190,250 in 19-20A from Administrative Redevelopment Property Tax Trust Fund (RPTTF) to RPTTF. HSC section 34191.4 (b) (3) (A) allows repayment to be equal to one-half of the increase between the ROPS residual pass-through distributed to the taxing entities in the preceding fiscal year and the ROPS residual pass-through distributed to the taxing entities in the fiscal year 2012-13 base year.

  According to the Los Angeles, County Auditor-Controller's report, the ROPS residual pass-through amount distributed to the taxing entities for fiscal year 2012-13 and 2018-19 are $1,422,570 and $2,145,561, respectively. Pursuant to the repayment formula, the maximum repayment amount authorized for the ROPS 19-20 period is $361,496. Therefore of the $380,500 requested, $19,004 ($380,500 – $361,496) is not eligible for RPTTF. The Agency may be eligible for additional funding on subsequent ROPS.

- On the ROPS 19-20 form, the Agency reported cash balances and activity for the period July 1, 2016 through June 30, 2017 (ROPS 16-17). According to our review, the Agency has approximately $960,990 from Other Funds available to fund enforceable obligations on the ROPS 19-20. HSC section 34177 (l) (1) (E) requires these balances to be used prior to requesting RPTTF. The following items do not require payment from property

tax revenues and the Agency has $960,990 in available Other Funds. Therefore, with the Agency's concurrence, the funding source for the following items has been reclassified in the amounts specified below:

Item No.	Item Name/Project Name	Total Funding Authorized	RPTTF Approved	Administrative RPTTF Approved	Other Funds Approved
6	Bond Administrative Fees	$6,000	$3,000	$0	$3,000
8	Contract for Rental Subsidies	30,384	15,192	0	15,192
9	Administrative Costs	250,000	0	125,000	125,000
10	2013 Tax Allocation Refunding Bonds	677,000	14,644	0	662,356
12	Reinstated City Loan	361,496	206,054	0	155,442
	Total	**$1,324,880**	**$238,890**	**$125,000**	**$960,990**

- The administrative costs claimed are within the fiscal year administrative cap pursuant to HSC section 34171 (b) (3). However, Finance notes the Oversight Board (OB) has approved an amount that appears excessive, given the number and nature of the obligations listed on the ROPS. HSC section 34179 (i) requires the OB to exercise a fiduciary duty to the taxing entities. Therefore, Finance encourages the OB to apply adequate oversight when evaluating the administrative resources necessary to successfully wind-down the Agency.

Pursuant to HSC section 34186, successor agencies are required to report differences between actual payments and past estimated obligations. Reported differences in RPTTF are used to offset current RPTTF distributions. The amount of RPTTF approved in the table on Page 4 includes the prior period adjustment resulting from the County Auditor-Controller's review of the prior period adjustment form submitted by the Agency.

Except for the items adjusted, Finance is not objecting to the remaining items listed on the ROPS 19-20. If the Agency disagrees with our determination with respect to any items on the ROPS 19-20, except items which are the subject of litigation disputing our previous or related determinations, the Agency 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 on our website:

http://dof.ca.gov/Programs/Redevelopment/Meet_And_Confer/

The Agency's maximum approved RPTTF distribution for the reporting period is $736,582 as summarized in the Approved RPTTF Distribution table on Page 4 (see Attachment).

RPTTF distributions occur biannually, one distribution for the July 1 through December 31 period (ROPS A period), and one distribution for the January 1 through June 30 period (ROPS B period) based on Finance approved amounts. Since this determination is for the entire ROPS 19-20 period, the Agency is authorized to receive up to the maximum approved RPTTF through the combined ROPS A and B period distributions.

Absent a Meet and Confer, this is our final determination regarding the obligations listed on the ROPS 19-20. This determination only applies to items when funding was requested for the 12-month period. If a denial by Finance in a previous ROPS is currently the subject of litigation, the item will continue to be denied until the matter is resolved.

The ROPS 19-20 form submitted by the Agency and this determination letter will be posted on our website:

http://dof.ca.gov/Programs/Redevelopment/ROPS/

This determination is effective for the ROPS 19-20 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 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 RPTTF is the same as the amount of property tax increment available prior to the enactment of redevelopment dissolution law. Therefore, as a practical matter, the ability to fund the items on the ROPS with property tax increment is limited to the amount of funding available to the Agency in RPTTF.

Please direct inquiries to Kylie Oltmann, Supervisor, or Brian Dunham, Lead Analyst, at (916) 322-2985.

Sincerely,

JENNIFER WHITAKER
Program Budget Manager

cc: Ms. Jamie Harvey, Senior Management Analyst, City of Claremont
Ms. Kristina Burns, Manager, Department of Auditor-Controller, Los Angeles County

Attachment

Approved RPTTF Distribution For the period of July 1, 2019 through June 30, 2020			
	ROPS A Period	ROPS B Period	ROPS 19-20 Total
RPTTF Requested	$ 18,192	$ 1,292,942	$ 1,311,134
Administrative RPTTF Requested	315,250	125,000	440,250
Total RPTTF Requested	**333,442**	**1,417,942**	**1,751,384**
RPTTF Requested	18,192	1,292,942	1,311,134
Adjustments			
Item No. 6	(3,000)	0	(3,000)
Item No. 8	(15,192)	0	(15,192)
Item No. 10	0	(662,356)	(662,356)
Item No. 12	34,808	(19,004)	15,804
	16,616	(681,360)	(664,744)
RPTTF Authorized	**34,808**	**611,582**	**646,390**
Administrative RPTTF Requested	315,250	125,000	440,250
Adjustments			
Item No. 9	(125,000)	0	(125,000)
Item No. 12	(190,250)	0	(190,250)
	(315,250)	0	(315,250)
Administrative RPTTF Authorized	**0**	**125,000**	**125,000**
Total RPTTF Authorized for Obligations	**34,808**	**736,582**	**771,390**
Prior Period Adjustment	**(34,808)**	**0**	**(34,808)**
Total RPTTF Approved for Distribution	**$ 0**	**$ 736,582**	**$ 736,582**