



April 12, 2019

Ms. Nadine Hade, Finance Director  
City of San Rafael  
1400 Fifth Avenue  
San Rafael, CA 94901

Dear Ms. Hade:

Subject: 2019-20 Annual Recognized Obligation Payment Schedule

Pursuant to Health and Safety Code (HSC) section 34177 (o) (1), the City of San Rafael 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 February 1, 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. 33–ROPS 15-16 Redevelopment Property Tax Trust Fund (RPTTF) Shortfall in the amount of \$43,813 is not allowed. The Agency requested funding for an RPTTF shortfall occurring during the ROPS 15-16 period. Review of accounting documents provided by the Agency for the ROPS 15-16 period does not support expenditures in excess of the total distributed RPTTF. The Agency provided no additional documentation to support the shortfall. Therefore, RPTTF requested in the amount of \$48,813 is not allowed.
- 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 County Auditor-Controller's review of the prior period adjustment form submitted by the Agency resulted in no prior period adjustment.

Except for the item 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/](http://dof.ca.gov/Programs/Redevelopment/Meet_And_Confer/)

The Agency's maximum approved RPTTF distribution for the reporting period is \$3,910,462 as summarized in the Approved RPTTF Distribution table on Page 3 (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 Cindie Lor, Supervisor, or Satveer Ark, Lead Analyst, at (916) 322-2985.

Sincerely,



JENNIFER WHITAKER  
Program Budget Manager

cc: Ms. Van Bach, Accounting Manager, City of San Rafael  
Mr. Roy Given, Director of Finance, Marin 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	\$ 3,437,163	\$ 373,612	\$ 3,810,775
Administrative RPTTF Requested	71,750	71,750	143,500
<b>Total RPTTF Requested</b>	<b>3,508,913</b>	<b>445,362</b>	<b>3,954,275</b>
<b>RPTTF Requested</b>	<b>3,437,163</b>	<b>373,612</b>	<b>3,810,775</b>
<u>Adjustment</u>			
Item No. 33	0	(43,813)	(43,813)
<b>RPTTF Authorized</b>	<b>3,437,163</b>	<b>329,799</b>	<b>3,766,962</b>
<b>Administrative RPTTF Authorized</b>	<b>71,750</b>	<b>71,750</b>	<b>143,500</b>
<b>Total RPTTF Authorized for Obligations</b>	<b>3,508,913</b>	<b>401,549</b>	<b>3,910,462</b>
Prior Period Adjustment	0	0	0
<b>Total RPTTF Approved for Distribution</b>	<b>\$ 3,508,913</b>	<b>\$ 401,549</b>	<b>\$ 3,910,462</b>