



CPAs AND ADVISORS

OCEANSIDE SMALL CRAFT HARBOR DISTRICT

JUNE 30, 2019

COMPONENT UNIT
FINANCIAL STATEMENTS
WITH REPORT ON AUDIT
BY INDEPENDENT
CERTIFIED PUBLIC ACCOUNTANTS

Focused
on YOU



OCEANSIDE SMALL CRAFT HARBOR DISTRICT

COMPONENT UNIT
FINANCIAL STATEMENTS

WITH REPORT ON AUDIT
BY INDEPENDENT
CERTIFIED PUBLIC ACCOUNTANTS

JUNE 30, 2019

OCEANSIDE SMALL CRAFT HARBOR DISTRICT

A COMPONENT UNIT OF THE
CITY OF OCEANSIDE, CALIFORNIA

JUNE 30, 2019

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INDEPENDENT AUDITORS' REPORT

To the President and the Board of Directors
Oceanside Small Craft Harbor District
Oceanside, California

Report on the Financial Statements

We have audited the accompanying financial statements of the Oceanside Small Craft Harbor District, (the Harbor), a component unit of the City of Oceanside, California, as of and for the year ended June 30, 2019, and the related notes to the financial statements, which collectively comprise the Harbor's basic financial statements as listed in the table of contents.

Management's Responsibility for the Financial Statements

Management is responsible for the preparation and fair presentation of these financial statements in accordance with accounting principles generally accepted in the United States of America; this includes the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.

Auditor's Responsibility

Our responsibility is to express opinions on these financial statements based on our audit. We conducted our audit in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free from material misstatement.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the financial statements. The procedures selected depend on the auditor's judgment, including the assessment of the risks of material misstatement of the financial statements, whether due to fraud or error. In making those risk assessments, the auditor considers internal control relevant to the entity's preparation and fair presentation of the financial statements in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the entity's internal control. Accordingly, we express no such opinion. An audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluating the overall presentation of the financial statements.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinions.



To the President and the Board of Directors
Oceanside Small Craft Harbor District
Oceanside, California

Opinions

In our opinion, the financial statements referred to above present fairly, in all material respects, the financial position of the Oceanside Small Craft Harbor District, as of June 30, 2019, and the changes in financial position and cash flows thereof for the year then ended in accordance with accounting principles generally accepted in the United States of America.

Emphasis of Matter

As discussed in Note 1 to the basic financial statements, the financial statements present the financial position of only the Harbor and do not present, or purport to present fairly, the financial position of the City of Oceanside as of June 30, 2019, and the changes in financial position and cash flows thereof for the year then ended in accordance with accounting principles generally accepted in the United States of America. Our opinion is not modified with respect to this matter.

Other Matters

Required Supplementary Information

Management has omitted the management's discussion and analysis that accounting principles generally accepted in the United States of America require to be presented to supplement the basic financial statements. Such missing information, although not a part of the basic financial statements, is required by the Governmental Accounting Standards Board, who considers it to be an essential part of financial reporting for placing the basic financial statements in an appropriate operational, economic, or historical context. Our opinion on the basic financial statements is not affected by this missing information.

Other Reporting Required by Government Auditing Standards

In accordance with *Government Auditing Standards*, we have also issued our report dated December 6, 2019 on our consideration of the Harbor's internal control over financial reporting and on our tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements and other matters. The purpose of that report is solely to describe the scope of our testing of internal control over financial reporting and compliance and the results of that testing, and not to provide an opinion on the effectiveness of the Harbor's internal control over financial reporting or on compliance. That report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the Harbor's internal control over financial reporting and compliance.

Brea, California
December 6, 2019

OCEANSIDE SMALL CRAFT HARBOR DISTRICT
A COMPONENT UNIT OF THE CITY OF OCEANSIDE, CALIFORNIA

STATEMENT OF NET POSITION
JUNE 30, 2019

Assets:

Current Assets:

| | |
|----------------------|------------------|
| Cash and investments | \$ 6,163,158 |
| Accounts receivable | 386,811 |
| Total Current Assets | <u>6,549,969</u> |

Noncurrent Assets:

Capital assets:

| | |
|-----------------------------------|---------------------|
| Buildings and improvements | 7,942,514 |
| Machinery and equipment | 1,469,333 |
| Improvements other than buildings | 22,704,590 |
| Less accumulated depreciation | <u>(23,722,921)</u> |

| | |
|-------------------------|------------------|
| Total Noncurrent Assets | <u>8,393,516</u> |
|-------------------------|------------------|

| | |
|---------------------|--------------------------|
| Total Assets | <u>14,943,485</u> |
|---------------------|--------------------------|

Liabilities:

Current Liabilities:

| | |
|-------------------------------------------|----------------|
| Accounts payable | 35,279 |
| Accrued interest | 4,167 |
| Unearned revenues | 31,272 |
| Deposits payable | 362,484 |
| Compensated absences, due within one year | 557 |
| Bonds payable, due within one year | <u>95,000</u> |
| Total Current Liabilities | <u>528,759</u> |

Noncurrent Liabilities:

| | |
|---------------------------------|----------------|
| Advances from City of Oceanside | 431,746 |
| Compensated absences | 320 |
| Bonds payable | <u>405,000</u> |

| | |
|------------------------------|----------------|
| Total Noncurrent Liabilities | <u>837,066</u> |
|------------------------------|----------------|

| | |
|--------------------------|-------------------------|
| Total Liabilities | <u>1,365,825</u> |
|--------------------------|-------------------------|

Net Position:

| | |
|----------------------------------|------------------|
| Net investment in capital assets | 7,893,516 |
| Unrestricted | <u>5,684,144</u> |

| | |
|---------------------------|-----------------------------|
| Total Net Position | <u>\$ 13,577,660</u> |
|---------------------------|-----------------------------|

The notes to financial statements are an integral part of this statement.

OCEANSIDE SMALL CRAFT HARBOR DISTRICT
A COMPONENT UNIT OF THE CITY OF OCEANSIDE, CALIFORNIA

STATEMENT OF REVENUES, EXPENSES AND CHANGES IN NET POSITION
FOR THE YEAR ENDED JUNE 30, 2019

Operating Revenues:

| | |
|-------------------------------------|-------------------------|
| Slip rentals and other related fees | \$ 7,024,358 |
| Parking | 967,014 |
| Sales and service charges | 37,638 |
| Fines, forfeitures, and penalties | 116,762 |
| Miscellaneous | 42,413 |
| Total Operating Revenues | <u>8,188,185</u> |

Operating Expenses:

| | |
|---------------------------------|-------------------------|
| Maintenance and operations | 1,306,522 |
| Depreciation expense | 477,800 |
| Total Operating Expenses | <u>1,784,322</u> |
| Operating Income | <u>6,403,863</u> |

Nonoperating Revenues (Expenses):

| | |
|-----------------------------------------------|-----------------------------|
| Investment earnings | 184,517 |
| Interest expense | (15,160) |
| Total Nonoperating Revenues (Expenses) | <u>169,357</u> |
| Income Before Transfers | 6,573,220 |
| Transfers to City of Oceanside | <u>(6,355,649)</u> |
| Change in Net Position | 217,571 |
| Net Position at the Beginning of the Year | <u>13,360,089</u> |
| Net Position at the End of the Year | <u>\$ 13,577,660</u> |

The notes to financial statements are an integral part of this statement.

**OCEANSIDE SMALL CRAFT HARBOR DISTRICT
A COMPONENT UNIT OF THE CITY OF OCEANSIDE, CALIFORNIA**

**STATEMENT OF CASH FLOWS
FOR THE YEAR ENDED JUNE 30, 2019**

| | |
|-----------------------------------------------------------------------------------------|----------------------------|
| Cash Flows from Operating Activities: | |
| Receipts from customers | \$ 7,724,680 |
| Other receipts | 42,413 |
| Payments to suppliers and service providers | (1,277,490) |
| Cash paid to employees for services | <u>(1,524)</u> |
| Net Cash Provided by Operating Activities | <u>6,488,079</u> |
| Cash Flows from Non-Capital Financing Activities: | |
| Cash transfers to the City of Oceanside | <u>(6,355,649)</u> |
| Net Cash (Used for) Non-Capital Financing Activities | <u>(6,355,649)</u> |
| Cash Flows from Capital and Related Financing Activities: | |
| Repayment of advance from the City of Oceanside | (23,000) |
| Principal paid on capital debt | (95,000) |
| Interest paid on capital debt | <u>(15,951)</u> |
| Net Cash (Used for) Capital and Related Financing Activities | <u>(133,951)</u> |
| Cash Flows from Investing Activities: | |
| Investment earnings | <u>184,517</u> |
| Net Cash Provided by Investing Activities | <u>184,517</u> |
| Net Increase in Cash and Cash Equivalents | 182,996 |
| Cash and Cash Equivalents, July 1 | <u>5,980,162</u> |
| Cash and Cash Equivalents, June 30 | <u>\$ 6,163,158</u> |
| Reconciliation of Operating Income to Net Cash Provided by Operating Activities: | |
| Operating income | <u>\$ 6,403,863</u> |
| Adjustments to Reconcile Operating Income to Net Cash Provided by Operating Activities | |
| Depreciation expense | 477,800 |
| (Increase) in accounts receivable | (195,702) |
| Increase in accounts payable | 29,032 |
| (Decrease) in unearned revenue | (257,598) |
| Increase in deposits payable | 32,208 |
| (Decrease) in compensated absences | <u>(1,524)</u> |
| Total Adjustments | <u>84,216</u> |
| Net Cash Provided by Operating Activities | <u>\$ 6,488,079</u> |
| Non-Cash Investing, Capital, and Financing Activities: | |
| Unrealized loss on investments | \$ (87,897) |

The notes to financial statements are an integral part of this statement.

**OCEANSIDE SMALL CRAFT HARBOR DISTRICT
A COMPONENT UNIT OF THE CITY OF OCEANSIDE, CALIFORNIA**

**NOTES TO BASIC FINANCIAL STATEMENTS
FOR THE YEAR ENDED JUNE 30, 2019**

Note 1: Summary of Significant Accounting Policies

The basic financial statements of the Oceanside Small Craft Harbor District (the Harbor) have been prepared in conformity with accounting principles generally accepted in the United States of America (GAAP) as applied to governmental agencies. The Governmental Accounting Standards Board (GASB) is the accepted standard setting body for establishing governmental accounting and financial reporting principles. The more significant of the Harbor's accounting policies are described below.

a. Financial Reporting Entity

The Harbor was established on July 6, 1959, pursuant to the State of California Harbor and Navigation Code, Part 7, Section 7000 entitled "Small Craft Harbor District". Its purpose is to finance, construct, organize and operate a small craft berthing facility and leaseholds within the harbor area.

The Harbor has been determined to be a blended component unit of the City of Oceanside, since the Oceanside City Council acts as the Board of Directors and is able to impose its will on the Harbor. Accordingly, the Harbor's financial operations have also been included in the City's basic financial statements.

b. Basis of Presentation

The Harbor reports its activities as an enterprise fund. An enterprise fund is a proprietary type fund used to account for operations (a) that are financed and operated in a manner similar to private business enterprises - where the intent of the governing body is that the costs (expenses, including depreciation) of providing goods or services to the general public on a continuing basis be financed or recovered primarily through user charges; or (b) where the governing body has decided that periodic determination of revenues earned, expenses incurred, and/or net income is appropriate for capital maintenance, public policy, management control, accountability or other purposes.

c. Measurement Focus and Basis of Accounting

Measurement focus is a term used to describe which transactions are recorded within the various financial statements. Basis of accounting refers to when transactions are recorded regardless of the measurement focus applied. The accompanying financial statements are reported using the economic resources measurement focus, and the accrual basis of accounting. Under the economic measurement focus all assets and liabilities (whether current or noncurrent) associated with these activities are included on the statement of net position. The statement of revenues, expenses and changes in fund net position present increases (revenues) and decreases (expenses) in total net position. Under the accrual basis of accounting, revenues are recorded when earned and expenses are recorded when a liability is incurred, regardless of the timing of related cash flows.

OCEANSIDE SMALL CRAFT HARBOR DISTRICT
A COMPONENT UNIT OF THE CITY OF OCEANSIDE, CALIFORNIA

NOTES TO BASIC FINANCIAL STATEMENTS (CONTINUED)
FOR THE YEAR ENDED JUNE 30, 2019

Note 1: Summary of Significant Accounting Policies (Continued)

d. Net Position

In the statement of net position, net assets can be classified in the following categories:

- Net Investment in capital assets - This amount consists of capital assets net of accumulated depreciation and reduced by outstanding debt that is attributed to the acquisition, construction, or improvement of the assets.
- Restricted net position - This amount is restricted by external creditors, grantors, contributors, or laws or regulations of other governments.
- Unrestricted net position - This amount is all net assets that do not meet the definition of "invested in capital assets, net of related debt" or "restricted net position".

When both restricted and unrestricted resources are available for use, the Harbor may use restricted resources or unrestricted resources based on the Board's discretion.

e. Operating Revenues and Expenses

Operating revenues, such as charges for services (slip rental and related fees), result from exchange transactions associated with the principal activity of the Harbor. Exchange transactions are those in which each party receives and gives up essentially equal values. Nonoperating revenues, such as investment income, result from nonexchange transactions or ancillary activities in which the Harbor gives (receives) value without directly receiving (giving) equal value in exchange.

Operating expenses include the cost of services, administrative expenses and depreciation on capital assets.

f. Cash and Cash Equivalents

The Harbor pools its available cash with the City for investment purposes. The Harbor considers these pooled cash and investments to be cash equivalents.

Investments are stated at fair value. Market value is used as fair value for those securities for which market quotations are readily available.

g. Capital Assets

Capital assets are valued at historical cost or estimated historical cost if actual historical cost was not available. Donated fixed assets are valued at their acquisition value as of the date of acquisition. Harbor policy has set the capitalization threshold for reporting infrastructure at \$100,000, all other capital assets are set at \$10,000. Depreciation is recorded on a straight-line basis over estimated useful lives of the assets as follows:

| | |
|-----------------------------------|-------------|
| Buildings and structures | 50-60 years |
| Improvements other than buildings | 30-60 years |
| Machinery and equipment | 5-20 years |

**OCEANSIDE SMALL CRAFT HARBOR DISTRICT
A COMPONENT UNIT OF THE CITY OF OCEANSIDE, CALIFORNIA**

**NOTES TO BASIC FINANCIAL STATEMENTS (CONTINUED)
FOR THE YEAR ENDED JUNE 30, 2019**

Note 1: Summary of Significant Accounting Policies (Continued)

h. Use of Estimates

The preparation of financial statements in conformity with accounting principles generally accepted in the United States of America requires management to make estimates and assumptions that affect the reported amounts of assets and liabilities and disclosure of contingent assets and liabilities at the date of the financial statements and the reported amounts of revenues and expenditures during the reporting period. Actual results could differ from those estimates and assumptions.

Note 2: Cash and Investments

Cash and investments at June 30, 2019, consisted of the following:

Cash and investments pooled with City of Oceanside \$ 6,163,158

The Harbor's cash and investments are pooled with the City of Oceanside's cash and investments in order to generate optimum interest income. Each fund's share of the pooled cash account is separately accounted for, and investment income is allocated to all participating funds based on the relationship of their average daily cash balances to the total of the pooled cash and investments. Information regarding the authorized types of deposits and investments, the type of risks (i.e. credit, interest rate, custodial, etc.) and other disclosures associated with the City's pooled cash and investments is included in the City's comprehensive annual financial report, which are available at City Hall.

Note 3: Capital Assets

A summary of changes in capital assets at June 30, 2019, is as follows:

| | Balance at July 1, 2018 | Additions | Deletions / Transfers | Balance at June 30, 2019 |
|------------------------------------------------|----------------------------|---------------------|--------------------------|-----------------------------|
| Capital assets not being depreciated: | | | | |
| Construction in progress | \$ - | \$ - | \$ - | \$ - |
| Total Capital Assets Not Being Depreciated | - | - | - | - |
| Capital assets being depreciated: | | | | |
| Buildings and improvements | 7,942,514 | - | - | 7,942,514 |
| Machinery and equipment | 1,469,333 | - | - | 1,469,333 |
| Improvements other than buildings | 22,704,590 | - | - | 22,704,590 |
| Total Capital Assets Being Depreciated | 32,116,437 | - | - | 32,116,437 |
| Less accumulated depreciation for: | | | | |
| Buildings and improvements | 2,048,080 | 181,973 | - | 2,230,053 |
| Machinery and equipment | 817,594 | 41,087 | - | 858,681 |
| Improvements other than buildings | 20,379,447 | 254,740 | - | 20,634,187 |
| Total Accumulated Depreciation | 23,245,121 | 477,800 | - | 23,722,921 |
| Total Capital assets Being Depreciated, Net | 8,871,316 | (477,800) | - | 8,393,516 |
| Capital Assets, Net | <u>\$ 8,871,316</u> | <u>\$ (477,800)</u> | <u>\$ -</u> | <u>\$ 8,393,516</u> |

**OCEANSIDE SMALL CRAFT HARBOR DISTRICT
A COMPONENT UNIT OF THE CITY OF OCEANSIDE, CALIFORNIA**

**NOTES TO BASIC FINANCIAL STATEMENTS (CONTINUED)
FOR THE YEAR ENDED JUNE 30, 2019**

Note 4: Compensated Absences

Changes in compensated absences for the year ended June 30, 2019, are as follows:

| | Balance July 1, 2018 | Additions | Deletions | Balance June 30, 2019 | Due Within One Year |
|----------------------|-------------------------|-----------|-----------|--------------------------|------------------------|
| Compensated Absences | \$ 2,401 | \$ - | \$ 1,524 | \$ 877 | \$ 557 |
| Totals | \$ 2,401 | \$ - | \$ 1,524 | \$ 877 | \$ 557 |

Compensated Absences

The liability for vested and unpaid compensated absences (accrued vacation and sick pay) is reported in the fund as the benefits vested and are earned. Effective June 30, 2011, the City is reporting future accrued liabilities related to compensated absences since all administrative and managerial functions are provided by the City of Oceanside. Any liabilities at June 30, 2019, relate to accrued unpaid compensated absences at transition.

Note 5: Direct Placement Bonds

A summary of changes in the long-term liabilities at June 30, 2019, is as follows:

| | Balance at July 1, 2018 | Additions | Deletions | Balance at June 30, 2019 | Due Within One Year |
|---------------------------------------|----------------------------|-----------|-------------|-----------------------------|------------------------|
| 2013 Gross Revenue Refunding Bonds | \$ 595,000 | \$ - | \$ (95,000) | \$ 500,000 | \$ 95,000 |

2013 Gross Revenue Refunding Bonds

The bonds were issued by the City through a private placement to prepay all of the Oceanside Small Craft Harbor District loans payable to the Department of Boating and Waterways. The bonds are due in annual installments ranging from \$95,000 to \$370,000 through August 2023. The interest rate is 2% and is payable annually on August 1. Bonds are not subject to optional redemption prior to maturity. As of June 30, 2019, the outstanding balance of these bonds was \$500,000.

The annual debt service requirements on these bonds are as follows:

| Year Ending June 30 | Principal | Interest | Total |
|------------------------|------------|-----------|------------|
| 2020 | \$ 95,000 | \$ 9,050 | \$ 104,050 |
| 2021 | 100,000 | 7,100 | 107,100 |
| 2022 | 100,000 | 5,100 | 105,100 |
| 2023 | 100,000 | 3,100 | 103,100 |
| 2024 | 105,000 | 1,050 | 106,050 |
| Totals | \$ 500,000 | \$ 25,400 | \$ 525,400 |

**OCEANSIDE SMALL CRAFT HARBOR DISTRICT
A COMPONENT UNIT OF THE CITY OF OCEANSIDE, CALIFORNIA**

**NOTES TO BASIC FINANCIAL STATEMENTS (CONTINUED)
FOR THE YEAR ENDED JUNE 30, 2019**

Note 6: Advance from the City

The City of Oceanside advanced funds to the Oceanside Small Craft Harbor District for the purpose of purchasing a new police vessel for harbor patrol. As of June 30, 2019, the outstanding balance of the loan was \$431,746.

Note 7: Related Party Transactions

General City Services

The Harbor pays the City of Oceanside for general City services consisting primarily of administrative and management information services, general insurance, certain personnel services and other related costs. Total payments to the City for the year ended June 30, 2019, were \$6,355,649.

Lease Agreement with the City of Oceanside

The Harbor leases land from the City which will expire on June 30, 2069. The annual rent amount is the greater of the annual minimum payment of \$250,000 or a percentage of the Harbor's gross annual revenue. Gross annual operating revenues include slip and locker rentals, building and ground leases and permit fees. The percentage amounts are as follows:

| <u>Year Ending</u> <u>June 30,</u> | <u>Percentage</u> |
|---------------------------------------|-------------------|
| 2019 - 2069 | 10.00% |

Total lease payments to the City for the year ended June 30, 2019, were \$737,836.

Note 8: Risk Management

The Harbor, through the City of Oceanside, is a member of the CASC - Excess Insurance Authority (CSAC-EIA) which provides general liability insurance. Further information on risk management is available in the comprehensive annual financial report of the City.



INDEPENDENT AUDITORS' REPORT ON INTERNAL CONTROL
OVER FINANCIAL REPORTING AND ON COMPLIANCE AND OTHER MATTERS
BASED ON AN AUDIT OF FINANCIAL STATEMENTS PERFORMED IN ACCORDANCE
WITH *GOVERNMENT AUDITING STANDARDS*

To the President and Members of the Board of Directors
Oceanside Small Craft Harbor District
Oceanside, California

We have audited, in accordance with the auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards* issued by the Comptroller General of the United States, the financial statements of the Oceanside Small Craft Harbor District (the Harbor), a component unit of the City of Oceanside, California, as of and for the year ended June 30, 2019, and the related notes to the financial statements, which collectively comprise the Harbor's basic financial statements, and have issued our report thereon dated December 6, 2019.

Internal Control over Financial Reporting

In planning and performing our audit of the financial statements, we considered the Harbor's internal control over financial reporting (internal control) to determine the audit procedures that are appropriate in the circumstances for the purpose of expressing our opinions on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the Harbor's internal control. Accordingly, we do not express an opinion on the effectiveness of the Harbor's internal control.

A deficiency in internal control exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, misstatements on a timely basis. A *material weakness* is a deficiency, or a combination of deficiencies, in internal control, such that there is a reasonable possibility that a material misstatement of the entity's financial statements will not be prevented, or detected and corrected on a timely basis. A *significant deficiency* is a deficiency, or a combination of deficiencies, in internal control that is less severe than a material weakness, yet important enough to merit attention by those charged with governance.

Our consideration of internal control was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control that might be material weaknesses or, significant deficiencies. Given these limitations, during our audit we did not identify any deficiencies in internal control that we consider to be material weaknesses. However, material weaknesses may exist that have not been identified.

Compliance and Other Matters

As part of obtaining reasonable assurance about whether the Harbor's financial statements are free from material misstatement, we performed tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements, noncompliance with which could have a direct and material effect on the determination of financial statement amounts. However, providing an opinion on compliance with those provisions was not an objective of our audit, and accordingly, we do not express such an opinion. The results of our tests disclosed no instances of noncompliance or other matters that are required to be reported under *Government Auditing Standards*.





CPAs AND ADVISORS

To the President and Members of the Board of Directors
Oceanside Small Craft Harbor District
Oceanside, California

Purpose of this Report

The purpose of this report is solely to describe the scope of our testing of internal control and compliance and the results of that testing, and not to provide an opinion on the effectiveness of the Harbor's internal control or on compliance. This report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the Harbor's internal control and compliance. Accordingly, this communication is not suitable for any other purpose.

Lance, Soll & Lughard, LLP

Brea, California
December 6, 2019