

**ORANGE COUNTY LOCAL  
TRANSPORTATION AUTHORITY**

**MEASURE M2 LOCAL FAIR SHARE  
CITY OF BUENA PARK**

**AGREED-UPON PROCEDURES REPORT**

**Year Ended June 30, 2025**

**ORANGE COUNTY LOCAL  
TRANSPORTATION AUTHORITY**

**MEASURE M2 LOCAL FAIR SHARE  
CITY OF BUENA PARK**

**AGREED-UPON PROCEDURES REPORT**

**Year Ended June 30, 2025**

The city of Buena Park was selected at the direction of the Orange County Local Transportation Authority Board of Directors to perform agreed-upon procedures for the fiscal year ended June 30, 2025.

INDEPENDENT ACCOUNTANTS' REPORT ON  
APPLYING AGREED-UPON PROCEDURES  
CITY OF BUENA PARK

Board of Directors  
Orange County Local Transportation Authority and  
the Taxpayer Oversight Committee of the  
Orange County Local Transportation Authority  
Orange, California

We have performed the procedures enumerated below, which were agreed to by the Taxpayer Oversight Committee of the Orange County Local Transportation Authority (OCLTA) (the specified party), related to the City of Buena Park's (City) compliance with certain provisions of the Measure M2 Local Transportation Ordinance (Ordinance) as of and for the fiscal year ended June 30, 2025. The City's management is responsible for compliance with the Ordinance and for its cash, revenue, and expenditure records.

The Taxpayer Oversight Committee of the OCLTA has agreed to and acknowledged that the procedures performed are appropriate to meet the intended purpose of evaluating the City's compliance with certain provisions of the Ordinance as of and for the fiscal year ended June 30, 2025. We make no representation regarding the appropriateness of the procedures either for the purpose for which this report has been requested or for any other purpose. This report may not be suitable for any other purpose. The procedures performed may not address all the items of interest to a user of this report and may not meet the needs of all users of this report and, as such, users are responsible for determining whether the procedures performed are appropriate for their purposes. An agreed-upon procedures engagement involves performing specific procedures that the engaging party has agreed to and acknowledged to be appropriate for the intended purpose of the engagement and reporting on findings based on the procedures performed.

The procedures and associated findings were as follows:

1. Obtain a copy of the City's FY25 Annual Comprehensive Financial Report and determine whether it reflects an unmodified opinion per Independent Auditor's report.

Findings: We obtained the City of Buena Park's FY25 Annual Comprehensive Financial Report and found that the independent auditor issued an unmodified opinion on the City's ACFR.

2. Describe which funds the City used to track all street and road expenditures and inquire how the City identifies MOE expenditures in its general ledger.

Findings: The MOE expenditures were tracked in the City's general ledger by fund and activity number. The City recorded its MOE expenditures in its General Fund (11) and State Tax Fund (24). The City identified MOE expenditures within the funds by a six-digit activity number. No exceptions were found as a result of this procedure.

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(Continued)

3. Obtain the detail of MOE expenditures for the fiscal year ended June 30, 2025 and determine whether the City met the minimum MOE requirement as outlined in the Measure M2 Eligibility Guidelines Fiscal Year 2024/2025. Agree the total MOE expenditures to the amount reported on the Eligible Jurisdiction's Expenditure Report (Schedule 3, Line 18). Explain any differences.

Findings: The City's MOE expenditures for the fiscal year ended June 30, 2025, were \$5,226,204 (see Schedule A), which exceeded the MOE benchmark requirement of \$4,778,989. We agreed the total expenditures of \$5,226,204 to the amount reported on the City's Expenditure Report (Schedule 3, line 18). No exceptions were found as a result of this procedure.

4. Select a sample of MOE expenditures from the Eligible Jurisdiction's general ledger expenditure detail. Describe the percentage of total expenditures selected for inspection. For each item selected, perform the following:
  - a. Agree the dollar amount listed on the general ledger to supporting documentation, which may include a check copy or wire transfer, vendor invoice, payroll registers and timecards, journal voucher or other appropriate supporting documentation; and
  - b. Determine whether the expenditure was properly classified as a local street and road expenditure and is allowable per the Ordinance.

Findings: We selected 37 direct MOE expenditures totaling \$2,326,503, which represented approximately 50% of direct MOE expenditures of \$4,614,598 for fiscal year ended June 30, 2025. We agreed the dollar amount listed on the general ledger to the supporting documentation provided by the City. We determined that the expenditures were properly classified as local street and road expenditures and are allowable per the Ordinance. No exceptions were found as a result of this procedure.

5. Identify whether indirect costs were charged as MOE expenditures. If applicable, compare indirect costs identified to the amount reported on the Eligible Jurisdiction's Expenditure Report (Schedule 3, line 1). Explain any differences. If applicable, obtain detail of indirect costs charged, and select a sample of charges for inspection. Inspect supporting documentation for reasonableness and appropriate methodology.

Findings: Based upon inspection of the general ledger detail, the Expenditure Report (Schedule 3, line 1), and discussion with the City's accounting personnel, indirect costs were identified as MOE expenditures for the fiscal year ended June 30, 2025. We agreed \$611,606 of indirect costs per the Expenditure Report (Schedule 3, line 1) to the general ledger detail. We selected 30 indirect MOE expenditures totaling \$310,626, which represented approximately 51% of indirect MOE expenditures. We recomputed the selected indirect costs using the City's allocation methodology and identified no exceptions. The indirect costs included building and vehicle maintenance fees. Upon inspecting the supporting documentation for the samples selected, we determined that the indirect MOE costs were properly classified as indirect expenditures and based on a reasonable and appropriate methodology. No exceptions were found as a result of this procedure.

6. Describe which fund the Eligible Jurisdiction used to track expenditures relating to Measure M2 Local Fair Share monies in its general ledger and the amount spent during the fiscal year ended June 30, 2025. Agree the total Local Fair Share expenditures per the general ledger to the amounts reflected on the Eligible Jurisdiction's Expenditure Report (Schedule 2, line 17, and detail listed at Schedule 4). Explain any differences.

Findings: The City tracks its LFS expenditures in its Measure M2 Fund (25) followed by a six-digit activity number. Total Measure M2 Local Fair Share expenditures per the general ledger during the fiscal year ended June 30, 2025, were \$797,573, which agreed to the City's Expenditure Report (Schedule 2, line 17, and detail listed at Schedule 4). No exceptions were found as a result of this procedure.

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(Continued)

7. Obtain the Eligible Jurisdiction's Seven-Year Capital Improvement Program (CIP). Compare the projects listed on the Eligible Jurisdiction's Expenditure Report (Schedule 4) to the Seven-Year CIP, explaining any differences. Select a sample of Measure M2 Local Fair Share expenditures from the Eligible Jurisdiction's general ledger expenditure detail. Describe the percentage of total expenditures selected for inspection. For each item selected perform the following:
  - a. Agree the dollar amount listed on the general ledger to supporting documentation, which may include a check copy or wire transfer, vendor invoice, payroll registers and timecards, journal vouchers or other appropriate supporting documentation; and
  - b. Determine that the expenditures selected in (a) above were related to projects included in the Eligible Jurisdiction's Seven-Year CIP and are properly classified as Measure M2 Local Fair Share projects.

Findings: We compared the projects listed on the City's Expenditure Report (Schedule 4) to the Seven-Year CIP, without any exception. We selected two Measure M2 Local Fair Share direct expenditures for inspection totaling \$658,928 representing approximately 83% of total Measure M2 direct Local Fair Share expenditures of \$797,573 for the fiscal year ended June 30, 2025. We agreed the dollar amount to supporting documentation provided by the City. After inspecting the supporting documentation, and through discussion with the City's accounting personnel, we identified two missing projects (Los Coyotes Rehabilitation Project – CP-12754 and Caballero Boulevard Pavement Rehabilitation Project – CP-12753) in the City's current Seven-Year CIP. We confirmed that the projects were included in prior year's Seven-Year CIPs' but not rolled forward to the current year. The City amended the 2024-25 Seven-Year CIP project list, with City Council approval received on February 10, 2026. No other exceptions were found as a result of this procedure.

8. Identify whether indirect costs were charged as Measure M2 Local Fair Share expenditures. If applicable, compare indirect costs identified to the amount reported on the Eligible Jurisdiction's Expenditure Report (Schedule 3, line 1). Explain any differences. If applicable, select a sample of charges. Describe the dollar amount tested. Identify the amounts charged and inspect supporting documentation for reasonableness and appropriate methodology.

Findings: Based upon inspection of the general ledger detail, the Expenditure Report (Schedule 3, line 1), and discussion with the City's accounting personnel, no indirect costs were identified as Measure M2 Local Fair Share expenditures for the fiscal year ended June 30, 2025. No exceptions were found as a result of this procedure.

We were engaged by OCLTA to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to and did not conduct an examination or review engagement, the objective of which would be the expression of an opinion or conclusion, respectively, on the accounting records, any indirect cost allocation plans and compliance with the provisions of the Measure M2 Local Transportation Ordinance. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of the City's management and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement.

At the request of OCLTA, the City's responses to certain findings are included in Exhibit 1. The responses are included for the purpose of additional information and were not subjected to the procedures described above. Accordingly, we did not perform any procedures on the City's responses and express no assurance or opinion on them.

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This report is intended solely for the information and use of and is not intended to be, and should not be, used by anyone other than the specified party.

*Crowe LLP*

Crowe LLP

Costa Mesa, California  
April 7, 2026

CITY OF BUENA PARK, CALIFORNIA  
 SCHEDULE OF MEASURE M2 LOCAL FAIR SHARE EXPENDITURES  
 Year ended June 30, 2025  
 (Unaudited)

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	<b>SCHEDULE A</b>
<b>Maintenance of Effort (MOE) Expenditures:</b>	
Indirect and/ or Overhead - Schedule 3, line 1	\$ 611,606
<b>Construction &amp; Right-of-Way</b>	
Street Reconstruction - Pavement	\$ 1,030,358
<b>Total Construction</b>	<u>\$ 1,030,358</u>
<b>Maintenance</b>	
Street Lights & Traffic Signals	\$ 1,371,105
Other Street Purpose Maintenance	1,019,266
Other Street Purpose Maintenance - Pavement	1,193,869
<b>Total Maintenance</b>	<u>\$ 3,584,240</u>
<b>Total MOE Expenditures</b>	<u><u>\$ 5,226,204</u></u>
<b>Measure M2 Local Fair Share Expenditures (Schedule 4):</b>	
Regio Avenue Pavement Rehabilitation	\$ 388,480
Knott Ave Pavement Rehabilitation, La Palma to Artesia Blvd	35,000
Dale Street Pavement Rehabilitation, SR91-Crescent	270,447
Los Coyotes Pavement Rehabilitation, Beach to Country Club Dr.	103,245
Caballero Pavement Rehabilitation, Valley View to Regio	400
<b>Total Measure M2 Local Fair Share Expenditures</b>	<u>\$ 797,573</u>
<b>Total MOE and Measure M2 Local Fair Share Expenditures</b>	<u><u>\$ 6,023,777</u></u>

Note: The above amounts were taken directly from the financial records of the City of Buena Park and were not audited.

April 7, 2026

Board of Directors  
Orange County Local Transportation Authority  
and the Taxpayer Oversight Committee of the  
Orange County Local Transportation Authority  
Orange, California

The following response is being submitted to address results from the agreed upon procedures performed for the Measure M2 Local Fair Share program for the City of Buena Park as of and for the fiscal year ended June 30, 2025.

**Procedure #7**

Obtain the Eligible Jurisdiction's Seven-Year Capital Improvement Program (CIP). Compare the projects listed on the Eligible Jurisdiction's Expenditure Report (Schedule 4) to the Seven-Year CIP, explaining any differences. Select a sample of Measure M2 Local Fair Share expenditures from the Eligible Jurisdiction's general ledger expenditure detail. Describe the percentage of total expenditures selected for inspection. For each item selected perform the following:

- a. Agree the dollar amount listed on the general ledger to supporting documentation, which may include a check copy or wire transfer, vendor invoice, payroll registers and timecards, journal vouchers or other appropriate supporting documentation; and
- b. Determine that the expenditures selected in (a) above were related to projects included in the Eligible Jurisdiction's Seven-Year CIP and are properly classified as Measure M2 Local Fair Share projects.

Findings: We compared the projects listed on the City's Expenditure Report (Schedule 4) to the Seven-Year CIP, without any exception. We selected two Measure M2 Local Fair Share direct expenditures for inspection totaling \$658,928 representing approximately 83% of total Measure M2 direct Local Fair Share expenditures of \$797,573 for the fiscal year ended June 30, 2025. We agreed the dollar amount to supporting documentation provided by the City. After inspecting the supporting documentation, and through discussion with the City's accounting personnel, we identified two missing projects (Los Coyotes Rehabilitation Project – CP-12754 and Caballero Boulevard Pavement Rehabilitation Project – CP-12753) in the City's current year Seven-Year CIP. We confirmed that the projects were included in prior year's Seven-Year CIPs' but not rolled forward to the current year. The City amended the 2024-25 Seven-Year CIP project list, with City Council approval received on February 10, 2026. No other exceptions were found as a result of this procedure.

City's Response:

Upon identification of the issue, City staff promptly coordinated a meeting with staff from the OCTA. Under the OCTA's guidance, City staff prepared and presented an amended eligibility project list to the City Council for approval. The amended FY 24/25 project list was subsequently submitted on February 12, 2026 and has been accepted by OCTA.

Both projects were originally reported to OCTA under the FY 23/24 eligible project list, and corresponding funds were budgeted within that same fiscal year. Following a transition in staff responsible for Measure M2 LFS eligibility reporting, the projects were not included in the FY 24/25 eligibility list. This omission occurred because no additional budget allocations for both projects were anticipated at that time, and staff

was not aware that ongoing projects with continuing expenditures must remain on the eligibility list. City staff has since received clarification and now understands the requirement to include all active projects with ongoing expenditures in future eligibility reporting.



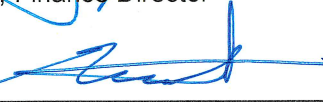
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Aaron France, City Manager



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Sung Hyun, Finance Director



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Mina Mikhael, Public Works Director