



CALAVERAS COUNCIL *of* GOVERNMENTS

FY 2015–2017 TRIENNIAL PERFORMANCE AUDIT OF
CALAVERAS COUNCIL OF GOVERNMENTS

SUBMITTED TO:

CALAVERAS COUNCIL OF GOVERNMENTS

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SUBMITTED BY:

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Executive Summary

Michael Baker International (Michael Baker) was retained by the Calaveras Council of Governments (CCOG) to conduct its Transportation Development Act (TDA) performance audit for Fiscal Years 2014–15 through 2016–17. As a Regional Transportation Planning Agency (RTPA), CCOG is required by Public Utilities Code (PUC) Section 99246 to prepare and submit an audit of its performance on a triennial basis to the California Department of Transportation to continue to receive TDA funding. TDA funding is used for CCOG administration and planning and is distributed to local jurisdictions for motorized and non-motorized forms of transportation.

This performance audit is intended to describe how well CCOG is meeting its administrative and planning obligations under TDA, as well as to present a description of its organizational management and efficiency. To gather information for the TDA performance audit, Michael Baker conducted interviews with CCOG Board members, Social Services Transportation Advisory Council (SSTAC) members, and agency staff, reviewed various documents, and evaluated CCOG’s responsibilities, functions, and performance of the TDA guidelines and regulations.

The audit comprises several sections, including compliance with TDA requirements, status of implementing prior audit recommendations, and review of functional areas. Findings from each section are summarized below, followed by recommendations based on our audit procedures.

Compliance with TDA Requirements

CCOG has satisfactorily complied with its applicable state legislative mandates for RTPAs. Compliance mandates that were not applicable to CCOG during the audit period include the adoption of regulations for the evaluation of claims under Article 4.5 of the TDA (there were no such claims), and the establishment of an urban transit farebox recovery ratio. A recent fiscal audit for Calaveras Transit was submitted to CCOG and to the State slightly after the allowed extension period.

During the audit period, CCOG took steps towards designating a CTSA for Calaveras County, such as a non-profit transportation provider, that may qualify for Article 4.5 funds. The CCOG amended its TDA Guidebook in June 2016 to include the criteria for selecting and designating an eligible CTSA to receive Article 4.5 funds.

Status of Prior Audit Recommendations

CCOG fully implemented four of the five prior performance audit recommendations. One recommendation was partially implemented and is carried forward in this audit

concerning the County's accountability toward compliance with provisions of the TDA such as farebox recovery attainment and claim submittal procedures. The four recommendations fully implemented pertained to following up on transit services funded through the unmet needs process, amending the *CCOG Policies & Procedures Manual*, exploring the potential for designating a Consolidated Transportation Services Agency, and pursuing mobility management services.

Functional Review

1. CCOG conducts its management of the TDA program in a competent, professional manner while operating in a complex intergovernmental environment.
2. During the audit period, staffing at CCOG experienced some changes involving the departure of the executive director and the administrative assistant. The executive director separated from CCOG in March 2017. The Administrative Services Officer served as Interim Executive Director from March to July. The transportation planner was promoted to the executive director's position in July 2017. Further, transportation planning duties were contracted with on-call consultants.
3. The CCOG Joint Powers Agreement (JPA) was amended in September 2015 to adjust the meeting time of the governing Board. The JPA amendment provided clarification that the CCOG Board would meet on the first Wednesday of the month, at 5:30 p.m. at the Board of Supervisors Chambers.
4. The 2017 Regional Transportation Plan (RTP) was developed during the audit period and adopted in October 2017. The 2017 RTP is a 25-year comprehensive plan guiding transportation policy for the region and makes recommendations concerning improvements to the existing transportation network. The RTP also cites State greenhouse gas emissions reduction mandates and emphasizes improvements in air quality and public health outcomes.
5. CCOG expedited project delivery for SR-4 Wagon Trail Expressway Project between Copperopolis and Angels Camp. CCOG has worked with Caltrans and the County through the public outreach process. The Project Approval and Environmental Documentation phase was completed during the audit period.
6. Board and SSTAC members have expressed a high confidence in CCOG staff members and their competence, knowledge, and responsiveness to requests. CCOG has proven adept in project programming and delivery.
7. The *CCOG Policies & Procedures Manual* underwent seven amendments during the audit period. The amendments include the Executive Director job description being moved to the appendices, adoption of the Conflict of Interest Code and Social Media

Standards and Procedures, Title VI Program Update and the Catastrophic Leave Program and Donation Policy.

8. In response to State legislation creating the Active Transportation Program (ATP), CCOG developed its own ATP with the hiring of a volunteer coordinator with a background in public health as well as created a website: Walk-Bike Calaveras.
9. CCOG provides a platform for transit service planning and performance review through the Interagency Transportation Committee composed of local agency and transit staff members. CCOG commissioned an update to the Calaveras County SRTP, which was finalized in January 2016. The aim of the current SRTP update was to evaluate services currently provided by Calaveras Transit and to develop a plan to improve system performance and provision over a five-year horizon.
10. There was only one unmet transit need that was reasonable to meet along with several additional recommendations for service enhancements during the audit period. The Unmet Needs Findings for FY 2014-15 identified fixed route service to the community of Burson as being reasonable to meet.
11. CCOG's public affairs and community engagement are conveyed through its website, publications, and public presentations. The CCOG website (<http://calacog.org/>) provides an extensive array of information about CCOG's projects and programs. Committee meeting agendas and minutes are posted and able to be downloaded (<http://ccogca.iqm2.com/Citizens/default.aspx>). The website was redesigned during the audit period and added a Facebook social media page.
12. CCOG held a Funding 101 workshop in 2015 for the COG Board and committee members, which was also open to the public. In addition, a policy conference was held the same year and featured panel discussions with local elected officials. CCOG is also considering an annual report to highlight its accomplishments and role in the community.
13. CCOG serves a significant role in administering grant-related revenues for the region. The administrative services officer is responsible for grant management, and the transportation planner (on-call consultants) is involved in monitoring, scope of work, milestones, and reporting. CCOG was instrumental in facilitating the award and execution of grants for local recipients and projects through the PTMISEA and the FTA Section 5310 programs. CCOG was also successful in obtaining several Caltrans Planning Grants, as well as partnerships with other regions such as the Zero Emissions Vehicle Readiness Plan with Tuolumne County Transportation Council. CCOG conducted a Call for Projects which programmed four years of CMAQ, RSTP, and LTF for local transportation construction projects. In addition, staff furthered the development of the online CIP database.

Recommendations

Six recommendations are provided to improve CCOG’s administration and management of the TDA and its organization. Each recommendation is described in detail in the last section of this audit and is summarized below:

Performance Audit Recommendation	Background
<p>#1. Continue to partner and identify mobility management strategies</p>	<p>CCOG, in implementing a prior recommendation regarding actions taken to promote mobility management, has worked with a local non-profit in securing a mobility management grant. The update of the Coordinated Plan and the JPA formation to administer public transit services in Calaveras County may allow for additional opportunities to partner for implementation of mobility management strategies. Interviews with SSTAC members revealed an emphasis on networking between the various service providers represented on the SSTAC. Some suggestions included developing a matrix of transit options available in Calaveras County and the implementation of a volunteer driver program. CCOG should continue partnering and working to identify strategies that address a full range of well synchronized mobility services within the County.</p>
<p>#2. Ensure further accountability toward compliance with provisions of the TDA such as farebox recovery attainment and claim submittal procedures.</p>	<p>It was noted that CCOG has continued to hold the County accountable for compliance with its TDA claim submittal. CCOG requires that TDA claims be certified by the County Auditor-Controller pursuant to CCR Section 6632. All modifications to the budget or claims must be submitted to allow adequate review time by the Technical Advisory Committee. Nevertheless, there have been ongoing challenges with the accuracy and timeliness of the County’s claim. CCOG has had to approve conditional claims due to discrepancies and lack of timeliness in the submittal of the initial TDA claim. Regarding the monitoring of performance trends, the County transit staff have not been diligent in reporting data to CCOG, in particular to the Interagency Transit Committee (ITC), or to the County Board of Supervisors. Although the contract operator for Calaveras Transit routinely prepares monthly reports including ridership statistics for each run and stop, County staff have not routinely analyzed and reported the data to CCOG. It is anticipated with the formation of the JPA to administer the transit system that TDA compliance will improve regarding consistent performance monitoring and claim procedures. It is also recommended that further accountability be attained through the regular reporting and analysis of transit performance data to the ITC.</p>

Performance Audit Recommendation	Background
<p>#3. Consider the appointment of a student representative on the SSTAC.</p>	<p>CCOG upholds the composition of the SSTAC is representative of the categories pursuant to PUC Section 99238 of the TDA. Given the rural profile of Calaveras County and the transit service area, CCOG has done a commendable job of recruiting and retaining members to the SSTAC. While position vacancies do occur, most of the categories have been represented. TDA allows discretion for CCOG to appoint other representatives above those required by statute, including those of limited means. CCOG already appoints one member at-large position. A suggestion would be to expand the at-large membership and recruit and appoint a student representative to the SSTAC. Based on the 2016 Calaveras County SRTP, students are Calaveras Transit’s largest market at 48 percent of all riders (Columbia College students comprise 70 percent of student ridership). Such an appointment would give a voice to an important segment of the transit dependent population in the discussion of transit coordination. Some incentives for recruitment might include offering free transportation to and from the unmet needs hearings and meetings or a free transit pass for the member’s service. A number of RTPAs recruit youth/student members to their SSTAC’s in engaging this large ridership group.</p>
<p>#4. Update the new appointee orientation for the SSTAC.</p>	<p>During interviews with SSTAC members, it was indicated that new appointees receive a handbook to review; however, an orientation with COG staff to review the handbook was not generally conducted. In comparison, new members appointed to the COG Board generally go through an orientation process composed of a one-on-one session with the CCOG executive director and receipt of a Board handbook. A suggestion that was brought during the interviews was for COG staff to offer an orientation, whether one-on-one or in a small group, along with the handbook to new SSTAC appointees. In addition, COG can offer the opportunity for a new member, if he/she desired, to be paired with a more experienced member for a time period to offer assistance and advice on COG issues, roles, and meeting protocol from a committee member perspective. Alternatively, in lieu of or in addition to the orientation, another suggestion would be to hold an annual Funding 101 workshop during one of the committee meetings so that all members are up to speed on COG responsibilities.</p>
<p>#5. Implement “timely use of funds” guidelines and enforcement.</p>	<p>An issue CCOG has had with administering funds for City and County projects is project delivery and timely use of funds. Caltrans developed guidelines describing the policy and procedures necessary to implement the timely use of funds</p>

Performance Audit Recommendation	Background
	<p>provisions outlined in AB 1012. Assembly Bill 1012 (Chapter 783 of the Statutes of 1999) was enacted with a goal of improving the delivery of transportation projects. Funding sources such as CMAQ and RSTP that are not obligated within the first three years of federal eligibility are subject to reprogramming by the California Transportation Commission in the fourth year. Regional agencies like CCOG are responsible for obligating the funds within the three-year time period and developing a plan for those funds remaining unobligated in the third year. CCOG should implement the timely use of funds guidelines and enforcement of funding timelines.</p>
<p>#6. Develop format and content for an annual CCOG report.</p>	<p>Despite its limited staffing resources, CCOG’s public engagement efforts have been quite extensive encompassing community outreach and meetings, website development, press releases and social media updates. The executive director mentioned the possibility of developing an annual report. An annual report is intended to encapsulate the activities and value that CCOG brings to the community through its mission and transportation coordination, planning, programming, financial, and project delivery responsibilities. In addition, an annual report identifies the projects and outcomes for the community as well as educates the public and stakeholders on CCOG’s role in transportation. Many RTPAs develop annual reports that serve such a purpose to highlight the accomplishments and challenges for the year, and what to look forward to in the next year. This has been a desire of CCOG and should be explored further.</p>

Section I

Introduction – Initial Review of CCOG Functions

The Calaveras Council of Governments (CCOG) has retained the firm of Michael Baker International (Michael Baker) to conduct its Transportation Development Act (TDA) performance audit covering the most recent triennial period, Fiscal Years (FY) 2014–15 through 2016–17. As a Regional Transportation Planning Agency (RTPA), CCOG is required by Public Utilities Code (PUC) Section 99246 to prepare and submit an audit of its performance on a triennial basis to the California Department of Transportation (Caltrans) in order to continue receiving TDA funding.

This performance audit, as required by the TDA, is intended to describe how well CCOG is meeting its administrative and planning obligations under the TDA.

Overview of CCOG and Calaveras County

CCOG was formed under a Joint Powers Agreement (JPA) comprising the County of Calaveras and the City of Angels Camp in January 1998 and amended in September 1999, February 2011, November 2013 and September 2015. The 2015 JPA amendment involved changing the meeting time of the regularly scheduled CCOG Board meeting from 6:30 p.m. to 5:30 p.m.

The JPA supersedes the Calaveras County Local Transportation Commission, which was formed in 1972 and disbanded in 1997 in favor of CCOG. The Local Transportation Commission was the designated RTPA by Caltrans pursuant to Title 36, Division 3, Chapter 2, Section 29532 of the California Government Code. CCOG coordinates regional planning efforts for both the County and the City.

Calaveras County is geographically located in the central Sierra Nevada foothills of California adjacent to the San Joaquin Valley and the Sierra Nevada. The county was incorporated on February 18, 1850, as one of California's 27 original counties. Calaveras County is bordered by Amador County to the north, Tuolumne County to the south, Alpine County to the east, and San Joaquin and Stanislaus Counties to the west. The highest elevation in the county is Corral Ridge at 8,174 feet above sea level whereas the lowest elevation in the county is just above sea level.

The county's geographical land area encompasses 1,020 square miles and is traversed by 868 miles of roadway. Major highways include State Routes (SR) 4, 12, 26, and 49. SR 49 is the main north-south highway connecting Calaveras County with Amador County to the north and Tuolumne County to the south. SR 4 is the main east-west highway traversing the county from San Joaquin County to the high Sierras and Bear Valley Ski Resort. SR 26 traverses the northwest corner of the county between the San Joaquin

County line near Rancho Calaveras and the Amador County line near West Point. SR 12 runs through the western portion of the county and serves as a connector to San Joaquin County. A demographic snapshot of key cities and the county is presented in Table I-1:

**Table I-1
Calaveras County Demographics**

City/Jurisdiction	2010 US Census Population	Change from 2000 US Census %	Population 65 Years & Older %	2017 Department of Finance Estimates	Land Area (in square miles)
Angels Camp (City of Angels)	3,836	+27.4%	22.76%	4,020	3.63
Unincorporated Area	41,742	+11.2%	20.82%	41,148	1,016.38
Total Calaveras County	45,578	+12.4%	20.99%	45,168	1,020.01

Source: 2010 U.S. Census, California Department of Finance, 2017 Population Estimates

The community of San Andreas is the county seat and the City of Angels Camp (also known as the City of Angels) is the county’s only incorporated city. Rancho Calaveras is the county’s largest census-designated place with a population of 5,325 based on the 2010 Census. The county experienced notable growth between the 2000 and 2010 US Censuses, particularly in Angels Camp. The senior citizen population, comprising residents aged 65 and over, is about 21 percent countywide. The 2017 population for Calaveras County is estimated to be 45,168 as reported by the California Department of Finance.

Other communities and census-designated places include Arnold, Avery, Copperopolis, Glencoe, Mokelumne Hill, Mountain Ranch, Murphys, Valley Springs, and West Point.

Forestry and fire protection, education, health care, government services, tourism, and viticulture are mainstays of the local economy. The proximity of Calaveras County to San Joaquin County is a contributing factor in the growth rates in the western portion of the county since 15 percent of employed residents commute to the Central Valley.

Role of CCOG

Like many other RTPAs of its size in California, CCOG serves as the lead planning and administrative agency for transportation projects and programs in Calaveras County. CCOG identifies funding sources, assists member agencies in obtaining funding, and ensure member agencies’ compliance with state and federal requirements. In addition, CCOG administers various funding sources.

Organizational Structure

Seven members comprise CCOG: two representatives each from the Calaveras County Board of Supervisors and the City of Angels City Council, and three citizen members. Each member agency designates at least one alternate representative who is a member of and is appointed by that member agency. The citizen members are residents of either Calaveras County or Angels Camp and are appointed by the governing bodies of the member agencies for a two-year term. No two citizen members can be from the same supervisorial district or the city while serving the CCOG Board at the same time unless approved by the member agency’s governing body. The CCOG Board generally meets on the first Wednesday of the month at 5:30 p.m. in the County of Calaveras Board of Supervisors chambers in San Andreas. The CCOG also has four standing committees to assist in providing policy recommendations in its decision-making process. Table I-2 describes these committees, while Figure I-1 shows the organization chart during the audit period.

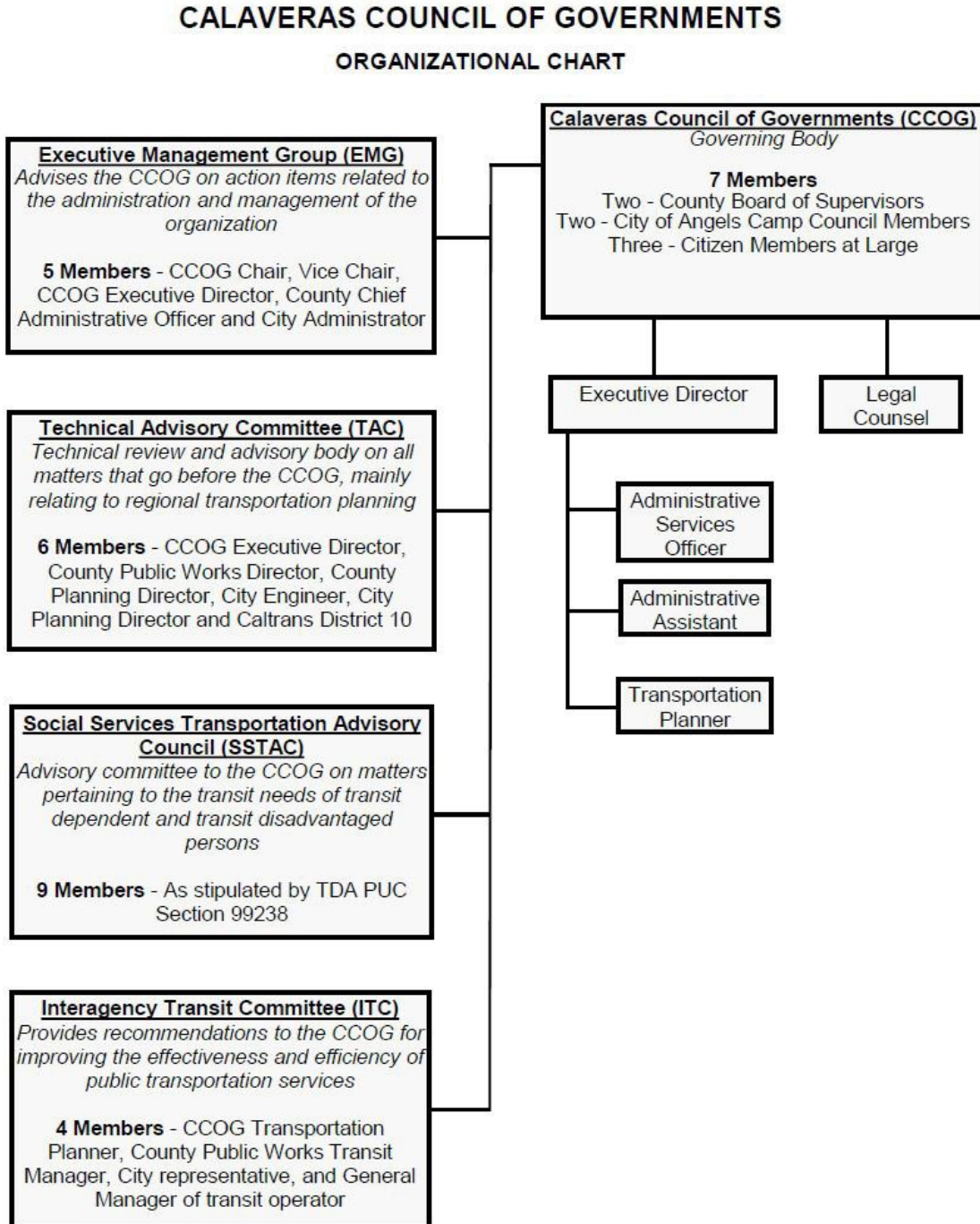
**Table I-2
CCOG Committees**

Committee	Purpose and Function
Technical Advisory Committee (TAC)	As the clearinghouse and technical review body for CCOG, this committee discusses issues of regional significance, reviews upcoming agenda items, and makes recommendations to the CCOG Board. The TAC meets on the third Wednesday of the month at 10:00 a.m. at CCOG offices or County/City offices. The six-member TAC is composed of the CCOG executive director, County planning director, County public works director, City of Angels planning director, City of Angels engineer, and the Caltrans, District 10 Director or designee.
Social Services Transportation Advisory Council (SSTAC)	The SSTAC serves in an advisory role in conjunction with the annual unmet transit needs process as well as to advise CCOG on the transit needs of transit dependent and transit disadvantaged persons, including older adults, persons with disabilities, and persons of limited means including, but not limited to, recipients of the CalWORKS program. The SSTAC also addresses social service issues related to the coordination and consolidation of public and specialized transportation services. Membership of the SSTAC is pursuant to PUC Section 99238 of the TDA based on the following categories and residency in Calaveras County:

Committee	Purpose and Function
	<ul style="list-style-type: none"> • At least one representative of potential transit users who is 60 years of age or older. • At least one representative of potential transit users who are persons with disabilities. • At least two representatives of the local social service providers for seniors, including one representative of a social service transportation provider, if one exists. • At least two representatives of local social service providers for persons with disabilities, including one representative of a social service transportation provider, if one exists. • At least one representative of a local social service provider for persons of limited means. • Two representatives from the local consolidated transportation service agency, designated pursuant to subdivision of Section 15975 of the Government Code, if one exists, including one representative from an operator, if one exists. • One member at-large position. In appointing council members, CCOG shall strive to attain geographic and minority representation among council members. <p>The current SSTAC is composed of nine members. One of the positions representing Social Service Provider for Seniors is vacant. CCOG staff and the Caltrans District 10 transit representative are ex-officio members of the SSTAC.</p>
<p>Executive Management Group (EMG)</p>	<p>The Executive Management Group (EMG) reviews all action items related to budget, policy, personnel, and other matters related to the administration and management of CCOG prior to presentation to the CCOG Board for approval. The EMG is composed of the CCOG chair, vice chair, CCOG executive director, County</p>

Committee	Purpose and Function
	<p>chief administrative officer and City administrator.</p> <p>The EMG meets at least on a quarterly or as-needed basis and has the following powers and responsibilities:</p> <ul style="list-style-type: none"> • Serves as a review panel for all personnel and policy matters and makes recommendations to the CCOG Board. • Conducts an annual review of the CCOG executive director and makes recommendations to the CCOG Board. • Carries out any special duties as may be assigned by the CCOG Board. • Reviews the findings and makes recommendations to the CCOG Board on the triennial classification, compensation, and utilization study.
<p>Interagency Transit Committee (ITC)</p>	<p>The Interagency Transit Committee (ITC) meets quarterly to review the performance of the transit system and provide recommendations to the CCOG for improving the effectiveness and efficiency of public transportation services pursuant to PUC 99244 and advise the update of the Short-Range Transit Plan (SRTP). The four-member ITC is composed of the CCOG transportation planner, County public works transportation manager, a representative from the City, and the general manager of the contracted public transit operator.</p> <p>As the RTPA, it is CCOG’s responsibility to annually identify, analyze, and recommend to the transit operator (County) potential productivity improvements which could lower operating costs. The CCOG provides improvement recommendations to the County based on ITC’s recommendations.</p>

**Figure I-1
CCOG Organization Chart**



Following the audit period, the transportation planner position was contracted to on-call consultants.

CCOG's audited annual revenue, as measured by all program revenue for each fiscal year, ranged from \$2,303,312 in FY 2015 to \$1,195,707 in FY 2016 to \$1,356,942 in FY 2017.¹ The higher revenues in FY 2015 were attributed to the receipt of Public Transportation Modernization Improvement and Service Enhancement Account (PTMISEA) funds.

CCOG's audited annual expenditures, as measured by all expenses including general administration, professional services, including County and City contracts, and rents and leases, ranged from \$1,842,373 in FY 2015 to \$1,505,946 in FY 2016 to \$1,342,467 in FY 2017.² The annual decrease was primarily from lower actual cost for professional services.

Audit Methodology

To gather information for this performance audit, Michael Baker accomplished the following activities:

- Document review: Michael Baker conducted an extensive review of documents including various CCOG files and internal reports, TDA claims files, financial reports, committee and board agendas, and other published public documents.
- Interviews: Michael Baker interviewed CCOG Board members and agency staff as well as members of the SSTAC.
- Analysis: Michael Baker evaluated the responses from the interviews as well as the documents reviewed about CCOG's responsibilities, functions, and performance to TDA guidelines and regulations. Additional research was conducted in audit areas that required further analysis.

The remainder of this report is divided into four sections. In Section II, Michael Baker provides a review of the compliance requirements of the TDA administrative process. Section III describes CCOG's responses to the recommendations provided in the previous performance audit. In Section IV, Michael Baker provides a detailed review of CCOG's functions. The last section summarizes our findings and recommendations.

¹ CCOG Annual Financial Report, Statement of Revenue, Expenditures, and Changes in Fund Balance.

² Ibid.

Section II

RTPA Compliance Requirements

Fourteen key compliance requirements are suggested in the *Performance Audit Guidebook for Transit Operators and Regional Transportation Planning Entities*, which was developed by Caltrans to assess CCOG’s conformance with the TDA. Our findings concerning CCOG’s compliance with state legislative requirements are summarized in Table II-1.

TABLE II-1 CCOG Compliance Requirements Matrix		
CCOG Compliance Requirements	Reference	Compliance Efforts
All transportation operators and city or county governments which have responsibility for serving a given area, in total, claim no more than those Local Transportation Fund (LTF) monies apportioned to that area.	Public Utilities Code, Section 99231	CCOG accounts for its claimants’ areas of apportionment and has not allowed those claimants to claim more than what is apportioned for their area. Population apportionments to the County and City for streets and roads are made after apportionment for transit. Transit claims by the County Public Works are conditioned on meeting CCOG terms and conditions outlined in the resolution. Multiple claims submitted by County Public Works have been deemed ineligible due to issues in financial reporting including inaccurate budgeting, carryover funds, and performance monitoring data. The County Auditor-Controller must certify the County’s carryover funds and budget as part of the claim. Due to operating deficits, CCOG has approved a conditional claim up to budgeted transit expenditures. Conclusion: Complied

TABLE II-1 CCOG Compliance Requirements Matrix		
CCOG Compliance Requirements	Reference	Compliance Efforts
The RTPA has adopted rules and regulations delineating procedures for the submission of claims for facilities provided for the exclusive use of pedestrians and bicycles.	Public Utilities Code, Sections 99233.3 and 99234	CCOG includes instructions in its TDA Guidebook for the submission of claims for pedestrian and bicycle projects. The CCOG allocates 2% of the annual LTF, after administration and planning, for bicycle and pedestrian facilities and projects pursuant to PUC Section 99233.3. This money is deposited into the bike and pedestrian account. Projects are selected through the TAC and must be consistent with the Bicycle and Pedestrian Master Plans and Regional Transportation Plan. Approval of the claim by the CCOG Board then channels the funds for that particular bicycle and pedestrian project. Conclusion: Complied
The RTPA has established a social services transportation advisory council. The RTPA must ensure that there is a citizen participation process which includes at least an annual public hearing.	Public Utilities Code, Sections 99238 and 99238.5	CCOG has established the SSTAC required under PUC 99238. It serves as a forum for community members, public transit, and social service transportation providers to discuss mobility issues that confront seniors, persons with disabilities, or persons with limited means. Conclusion: Complied
The RTPA has annually identified, analyzed and recommended potential productivity improvements which could lower the operating costs of those operators which operate at	Public Utilities Code, Section 99244	Operational issues are discussed by the ITC. This committee works to coordinate services, discuss regional transit issues, and exchange ideas to enable the transit system to operate more efficiently. With lack of timely performance data from Calaveras

TABLE II-1 CCOG Compliance Requirements Matrix		
CCOG Compliance Requirements	Reference	Compliance Efforts
<p>least 50 percent of their vehicle service miles within the RTPA’s jurisdiction. Recommendations include, but are not limited to, those made in the performance audit.</p> <ul style="list-style-type: none"> • A committee for the purpose of providing advice on productivity improvements may be formed. • The operator has made a reasonable effort to implement improvements recommended by the RTPA, as determined by the RTPA, or else the operator has not received an allocation which exceeds its prior year allocation. 		<p>Transit, the ITC’s effectiveness and accountability to provide productivity improvements becomes limited.</p> <p>In addition to the ITC, CCOG uses the SSTAC to analyze transit needs and suggest improvements.</p> <p>Other methods for identifying productivity improvements include that CCOG requires the County to submit a status of implementing prior performance audit recommendations with its TDA claim. The prior triennial performance audit findings and recommendations are shared with the ITC.</p> <p>Further, transit planning projects, including the Short-Range Transit Plan, Transit Maintenance and Organizational Analysis, Intercity Transit Service Feasibility Study, and the Calaveras County 2014 Coordinated Public Transit – Human Services Transportation Plan, have been regular transit items on the ITC agendas for discussion with City and County.</p> <p>Conclusion: Complied</p>
<p>The RTPA has ensured that all claimants to whom it allocates Transportation Development Act (TDA) funds submit to it and to the State Controller an</p>	<p>Public Utilities Code, Section 99245</p>	<p>CCOG selects one certified public accountant to conduct all TDA claimants’ fiscal and compliance audits. Richardson & Company, LLP is retained to complete the fiscal audits for the four-year audit period. The</p>

TABLE II-1 CCOG Compliance Requirements Matrix		
CCOG Compliance Requirements	Reference	Compliance Efforts
<p>annual certified fiscal and compliance audit within 180 days after the end of the fiscal year (December 27). The RTPA may grant an extension of up to 90 days as it deems necessary (March 26).</p>		<p>TDA fiscal audits were completed by the timelines set by the State Controller or have been granted the appropriate extension as follows:</p> <p>FY 2015: February 16, 2016 FY 2016: March 22, 2017 FY 2017: April 11, 2018</p> <p>Conclusion: Partial Compliance</p>
<p>The RTPA has designated an independent entity to conduct a performance audit of operators and itself (for the current and previous triennium).</p> <p>For operators, the audit was made and calculated the required performance indicators, and the audit report was transmitted to the entity that allocates the operator’s TDA monies and to the RTPA within 12 months after the end of the triennium. If an operator’s audit was not transmitted by the start of the second fiscal year following the last fiscal year of the triennium, TDA funds were not allocated to that operator for that or subsequent fiscal years until the audit was transmitted.</p>	<p>Public Utilities Code, Sections 99246 and 99248</p>	<p>For the current three-year audit, CCOG retained Michael Baker International to conduct the performance audit of CCOG and the transit operator.</p> <p>PMC was retained to conduct the performance audits for the previous triennium.</p> <p>Conclusion: Complied</p>

TABLE II-1 CCOG Compliance Requirements Matrix		
CCOG Compliance Requirements	Reference	Compliance Efforts
The RTPA has submitted a copy of its performance audit to the Director of the California Department of Transportation. In addition, the RTPA has certified in writing to the Director that the performance audits of the operators located in the area under its jurisdiction have been completed.	Public Utilities Code, Section 99246(c)	A copy of the letter submitted to the Caltrans Mass Transportation Division certifying completion of the performance audits from the previous triennium was provided to the auditor as evidence of compliance. The letter was dated June 19, 2015. Conclusion: Complied
The performance audit of the operator providing public transportation service shall include, but not be limited to, a verification of the operator’s operating cost per passenger, operating cost per vehicle service hour, passengers per vehicle service mile, and vehicle service hours per employee, as defined in Section 99247. The performance audit shall include, but not be limited to, consideration of the needs and types of passengers being served and the employment of part-time drivers and the contracting with common carriers of persons operating under a franchise or license to provide services during peak hours, as defined in subdivision (a)	Public Utilities Code, Section 99346(d)	The performance audit of Calaveras Transit includes all required TDA performance measures plus additional indicators where warranted to further assess each operator’s efficiency, effectiveness, and economy with the use of TDA funds. Conclusion: Complied

TABLE II-1 CCOG Compliance Requirements Matrix		
CCOG Compliance Requirements	Reference	Compliance Efforts
of Section 99260.2.		
The RTPA has established rules and regulations regarding revenue ratios for transportation operators providing services in urbanized and newly urbanized areas.	Public Utilities Code, Sections 99270.1 and 99270.2	The transit service in Calaveras County operates in a non-urbanized area. Conclusion: Not Applicable
The RTPA has adopted criteria, rules and regulations for the evaluation of claims under Article 4.5 of the TDA and the determination of the cost-effectiveness of the proposed community transit services.	Public Utilities Code, Section 99275.5	There are currently no Article 4.5 claimants in Calaveras County. CCOG made effort in identifying and designating a CTSA to foster efficiencies and coordination in social service transportation. An RFP was issued to designate a CTSA in September 2016; however, no qualified proposals were received. CCOG’s TDA Manual includes criteria for the selection of an agency to designate as a CTSA, and terms and conditions in a resolution designating a CTSA. One of these terms is the claim amount in which CCOG shall provide guidance on an acceptable LTF claim amount to be available to the CTSA; CCOG may limit the amount of an Article 4.5 claim according to criteria which it establishes. Once a CTSA is designated, CCOG will then establish criteria, rules and regulations for evaluation of the claim. Conclusion: Not Applicable

TABLE II-1 CCOG Compliance Requirements Matrix		
CCOG Compliance Requirements	Reference	Compliance Efforts
State transit assistance funds received by the RTPA are allocated only for transportation planning and mass transportation purposes.	Public Utilities Code, Sections 99310.5 and 99313.3, and Proposition 116	CCOG allocates State Transit Assistance (STA) funds for transit operating, administrative, capital, and planning expenditures only. Conclusion: Complied
The amount received pursuant to Public Utilities Code, Section 99314.3; by each RTPA for state transit assistance is allocated to the operators in the area of its jurisdiction as allocated by the State Controller's Office.	Public Utilities Code, Section 99314.3	CCOG administers STA funds in accordance with the relevant PUC requirements (i.e., on the basis of population. Calaveras Transit does not receive STA funds based on revenues, as the State Controller has indicated that Calaveras Transit is an Article 8 claimant). Similar to LTF claims, STA is approved with terms and conditions for County Public Works. Conclusion: Complied
If TDA funds are allocated to purposes not directly related to public or specialized transportation services, or facilities for exclusive use of pedestrians and bicycles, the transit planning agency has annually: <ul style="list-style-type: none"> • Consulted with the Social Services Transportation Advisory Council (SSTAC) established pursuant to Public Utilities Code, Section 99238; • Identified transit needs, 	Public Utilities Code, Section 99401.5	LTF funds have only been allocated to streets and roads after completion of the unmet needs process. CCOG conducts the unmet needs hearings in consultation with the SSTAC. The definitions of “unmet transit needs” and “reasonable to meet” are reaffirmed in the report and findings of the unmet needs process are adopted through Board resolution. Evidence of published advertisement of the hearings in each jurisdiction is also provided in the report. Conclusion: Complied

TABLE II-1 CCOG Compliance Requirements Matrix		
CCOG Compliance Requirements	Reference	Compliance Efforts
<p>including:</p> <ul style="list-style-type: none"> ○ Groups that are transit-dependent or transit-disadvantaged, ○ Adequacy of existing transit services to meet the needs of groups identified, and ○ Analysis of potential alternatives to provide transportation services; <ul style="list-style-type: none"> ● Adopted or re-affirmed definitions of “unmet transit needs” and “reasonable to meet”; ● Identified the unmet transit needs or there are no unmet transit needs, or that there are unmet transit needs that are reasonable to meet. <p>If a finding is adopted that there are unmet transit needs, these needs must have been funded before an allocation was made for streets and roads.</p>		
<p>The RTPA has caused an audit of its accounts and records to be performed for each fiscal year by the</p>	<p>California Administrative Code, Section 6662</p>	<p>The accounting firm of Richardson & Company, LLC conducted the annual financial audit of CCOG during the triennial performance audit period.</p>

TABLE II-1 CCOG Compliance Requirements Matrix		
CCOG Compliance Requirements	Reference	Compliance Efforts
<p>county auditor or a certified public accountant. The RTPA must transmit the resulting audit report to the State Controller within 12 months of the end of each fiscal year and must be performed in accordance with the Basic Audit Program and Report Guidelines for California Special Districts prescribed by the State Controller. The audit shall include a determination of compliance with the transportation development and accompanying rules and regulations. Financial statements may not commingle the state transit assistance fund, the local transportation fund, or other revenues or funds of any city, county or other agency. The RTPA must maintain fiscal and accounting records and supporting papers for at least four years following the fiscal year close.</p>		<p>The audits were completed within the statutory time frame for all fiscal years covered by this audit. These Comprehensive Annual Financial Reports were submitted to the State Controller within 12 months of the end of each fiscal year.</p> <p>The completion dates were:</p> <p>FY 2015: February 12, 2016 FY 2016: March 15, 2017 FY 2017: March 28, 2018</p> <p>CCOG also maintains fiscal and accounting records and supporting papers for at least four years following the fiscal year close.</p> <p>Conclusion: Complied</p>

Findings and Observations from RTPA Compliance Requirements Matrix

CCOG has satisfactorily complied with its applicable state legislative mandates for RTPAs. Two additional mandates were not applicable to the Council: the adoption of criteria, rules, and regulations for the evaluation of claims under Article 4.5 of the TDA, and the establishment of urbanized farebox ratios. There are currently no Article 4.5 claimants or urbanized areas in Calaveras County to warrant such compliance. A recent fiscal audit for Calaveras Transit was submitted to CCOG and to the State slightly after the allowed extension period.

During the audit period, CCOG took steps towards designating a CTSA for Calaveras County, such as a non-profit transportation provider, that may qualify for Article 4.5 funds. The CCOG amended its TDA Guidebook in June 2016 to include the criteria for designating a CTSA eligible to receive Article 4.5 funds. CCOG received a FTA 5310 grant to fund mobility management activities for two years and serve as seed money for a CTSA, if designated. The COG released an RFP in September 2016 for a CTSA but received no qualified responses. A designated CTSA could serve as a basis for implementing the Calaveras County 2014 Coordinated Public Transit – Human Services Transportation Plan, which will be undergoing an update in FY 2018-19. To its credit, CCOG has complied with the TDA requirements using relatively limited staff resources to implement the various programs in the TDA statute.

Section III

Prior Triennial Performance Audit Recommendations

This chapter describes CCOG’s response to the recommendations included in the prior triennial performance audit. For this purpose, each prior recommendation for the agency is described, followed by a discussion of the agency’s efforts to implement the recommendation. Conclusions concerning the extent to which the recommendations have been adopted by the agency are then presented.

Prior Recommendation 1

Analyze the potential for designating a Consolidated Transportation Services Agency (CTSA) to serve as a basis for implementing the Calaveras County 2014 Coordinated Public Transit – Human Services Transportation Plan.

Background: Pursuant to PUC Section 99275.5, an RTPA can adopt criteria, rules, and regulations for the evaluation of claims under Article 4.5 of the TDA and the determination of the cost-effectiveness of the proposed community transit services. There are currently no Article 4.5 claimants in Calaveras County.

It was suggested that CCOG analyze the potential for designating a CTSA, such as a non-profit transportation provider, for transportation cost and service efficiencies and to serve as a basis for implementing the Calaveras County 2014 Coordinated Public Transit – Human Services Transportation Plan. The update of the Coordinated Plan has given CCOG more detailed information regarding the transportation needs and services for transit-dependent individuals, including a detailed inventory of transportation services provided by social service agencies. A non-profit transportation provider with a proven track record of providing the necessary coordination and services associated with a CTSA would be a logical selection.

Actions taken by CCOG

In response to this recommendation, CCOG took the necessary steps towards designating a local CTSA during the audit period. In Calaveras County, agencies that would qualify for designation as a CTSA include the County, the City of Angels Camp, an existing nonprofit corporation, or a newly created nonprofit corporation. The TDA Guidebook was amended in June 2016 to include criteria on the designation and administration of a CTSA. The CCOG conducted a solicitation process in September 2016 through an RFP for mobility management with a CTSA option, but received no qualified responses. There was one insufficient response from a local non-profit that did not meet all the requirements presented in the RFP nor had a proven track record of coordinated public transportation in Calaveras County. CCOG will be updating the Coordinated Plan

in 2018, which will contain further define the terms and conditions for the formation of a CTSA. The formation of a transit agency through a JPA could also provide more incentives and options for CTSA formation.

Conclusion

This recommendation has been implemented.

Prior Recommendation 2

Support a new contract staff position for Mobility Management.

Background: The CCOG applied for and received a federal 5310 grant for a mobility management position that will serve as a catalyst for the coordination of transportation strategies and services in the Calaveras County 2014 Coordinated Public Transit – Human Services Transportation Plan. The grant was for a two-year period and implemented a SSTAC decision for the COG to serve as the coordinator. This position will be responsible for Mobility Management which, under the Federal Transit Administration (FTA) definition: "consists of short-range planning, management activities and projects for improving coordination among public transportation and other transportation service providers with the intent of expanding the availability of services." The position would implement and maintain the Coordinated Plan; identify additional partners and resources to implement the Coordinated Plan strategies; research and pursue funding sources; provide technical assistance to applicant agencies/organizations around FTA 5310 grant or other program applications, processes, and compliance/reporting requirements. The position is planned to be on a year-by-year contract basis and contingent upon continued future grant funding. CCOG should provide the resources to support this new position to advance the objectives and goals of expanded transportation options for the community.

Actions taken by CCOG

In consideration of supporting a mobility management position, the idea was to provide a "one-stop" shop where a variety of transportation options could be made available and coordinated. The 2014 Coordinated Plan acknowledged the potential to implement a mobility management position incumbent on available funding sources. The plan outlined potential advantages of a mobility management position:

- It is an organizing strategy for initiating coordinated projects to address mobility gaps of the target groups, providing leadership around these projects.
- It becomes a focal point for getting the right partners to the table to secure additional funds or overcome institutional barriers or promote new services.
- It can help to secure funding, including new funding, through which to implement new mobility projects.

CCOG was awarded a FTA 5310 grant specifically for Mobility Management services. COG staff administered a RFP for which there were no interested, willing, or able agencies. It was determined that mobility management is beyond the capacity of the County to administer and is considered politically infeasible. CCOG then supported Common Ground Senior Services, a local non-profit, in applying for a grant independently to implement mobility management. Common Ground Senior Services was successful in receiving the mobility management grant. CCOG will be launching an update of the Coordinated Plan, which further evaluate the role of mobility management in Calaveras County.

Conclusion

This recommendation has been implemented. Follow up would include CCOG continuing its partnerships and working to identify strategies that address a full range of well synchronized mobility services within the County.

Prior Recommendation 3

Continue efforts that promote the County's accountability toward compliance with provisions of the TDA such as farebox recovery attainment and claim submittal procedures.

Background: The prior audit noted the ways CCOG offers assistance in its role as an RTPA that provided Calaveras Transit management the foundation to make operational decisions and improvements. It was suggested that CCOG establish a procedure for Calaveras Transit to submit performance data (system-wide and by route) as a condition of receipt of TDA funds. Through performance measures submitted by Calaveras Transit on a regular basis, CCOG would be able to monitor ongoing service trends and provide input on specific issues so that Calaveras Transit can plan, develop, and implement service adjustments. With measurable performance indicators such as those shown in the performance audit of Calaveras Transit, CCOG and the County can establish a stronger means to improve service and work with County decision makers.

Actions taken by CCOG

CCOG has continued to hold the County accountable with TDA claim submittal procedure compliance. CCOG requires that TDA claims be certified by the County Auditor-Controller pursuant to CCR Section 6632. All modifications to the budget or claims must be submitted to allow adequate review time by the Technical Advisory Committee. Nevertheless, there have been ongoing challenges with the accuracy and timeliness of the County's claim. CCOG has had to approve conditional claims due to discrepancies and lack of timeliness in the submittal of the TDA claim. LTF claims submitted by the County showed inconsistencies including LTF revenue requests that did not align with County transit operating costs. Budgeted costs provided by the Public

Works Department were not consistent with actual and audited costs, and experienced relatively significant swings. To provide on-going funding for transit, CCOG staff proposed and the CCOG board approved that the County conditional LTF claim be based on “Annualized Actuals” using Budget to Actuals Report provided by the County Public Works Department. The amount approved would be averaged out by month. The County Chief Administrative Officer and Auditor have supported the COG’s findings.

Regarding the monitoring of performance trends, the County transit staff have not been diligent in reporting data to CCOG, in particular to the Interagency Transit Committee (ITC). Although the contract operator for Calaveras Transit routinely prepares semi-annual performance reports, County staff have not routinely analyzed and reported the data to CCOG. The City of Angels has requested that the County place on its agenda quarterly transit updates to the Board of Supervisors with notification given to City staff. When County staff has reported on performance trends during ITC meetings, it has often been verbal.

It is anticipated with the formation of the Joint Powers Authority to administer the transit system that TDA compliance will improve regarding consistent performance monitoring and claim procedures.

Conclusion

This recommendation has been partially implemented.

Prior Recommendation 4

Follow up on transit services funded through the unmet needs process.

Background: When unmet transit needs are found to be reasonable to meet and receive TDA funding, the new or enhanced service should be implemented on a trial basis for a specified time (e.g., one or two years), and require performance reporting by Calaveras Transit and performance monitoring by CCOG. Similar to reporting of new transit service extensions under TDA, there should be separate reporting of operational data on at least a limited basis by Calaveras Transit to CCOG. This will enable CCOG to ensure the service is being provided and to help make funding decisions on future TDA claims request.

Actions taken by CCOG

As part of the annual unmet transit needs process, CCOG prepares a detailed report documenting the conditions of the transit system and service area and public testimony of any potential unmet needs. The definitions of an “unmet transit need” or what service requests would be “reasonable to meet” are presented and reaffirmed. Some of the new services implemented by Calaveras Transit during the audit period resulted

from the unmet transit needs process such as to the community of Burson and the Delta Gold Line to Stockton.

The Unmet Transit Needs Report contains a chapter on the adequacy of TDA funded transit services that provides an overview of existing services, SRTP performance benchmarks and recommendations as well as a section on the adequacy of Calaveras Transit services. Transit performance is compared against the SRTP performance targets and recommendations along with an analysis of operating costs and ridership. Performance reports and ITC meetings provide the follow up on progress with these new services, with several new services being terminated. The Unmet Transit Needs findings report also includes status of prior unmet needs findings.

Conclusion

This recommendation has been implemented.

Prior Recommendation 5

Amend *CCOG Policies & Procedures Manual* with additional materials recently developed.

Background: The *CCOG Policies & Procedures Manual* was adopted in December 2011 and has been amended three times to reflect new material developed by CCOG staff. Additional procedures have since been developed by staff including calls for projects, grant management, and additional procurement practices found through the Rural Counties Task Force. CCOG's efforts to adopt formal policies provide an efficient method of conveying standard agency practice through providing legacy documentation.

Actions taken by CCOG

In response to this recommendation, CCOG amended the *Policies & Procedures Manual* a total of seven times during the audit period to reflect new policies and programs. A draft of the amended policies and procedures was presented to the Board at its April 5, 2017 meeting. Key amendments to the manual include the Executive Director job description being moved to the appendices, adoption of the Conflict of Interest Code and Social Media Standards and Procedures (9/3/2014), Title VI Program Update (5/6/2015) and the Catastrophic Leave Program and Donation Policy (2/1/2017). In addition, federal formula and discretionary grant descriptions were also amended to reflect the changes in the federal transportation authorization bill (FAST Act).

Conclusion

This recommendation has been implemented.

Section IV

Detailed Review of RTPA Functions

In this section, a detailed assessment of CCOG's functions and performance as an RTPA during this audit period is provided. Adapted from Caltrans' *Performance Audit Guidebook for Transit Operators and Regional Transportation Planning Entities*, CCOG's activities can be divided into the following activities:

- Administration and Management
- Transportation Planning, Programming, and Coordination
- TDA Claimant Relationships and Oversight
- Public Information and Alternative Transportation
- Grant Application and Management

Administration and Management

This section discusses the overall administration of CCOG's functions, which include general administration, internal planning and achievements, the OWP, personnel management, and interviews with Board and SSTAC members.

General Administration

The purpose of CCOG is to serve as the lead planning and administrative agency for transportation projects and funding programs in Calaveras County. Its constituent members are the County of Calaveras and the City of Angels Camp. CCOG's mission statement expounds upon its purpose:

The CCOG is the planning agency which coordinates with its partners and communities to optimize the existing and future transportation systems.

During most of the audit period, CCOG staff was composed of an executive director and three administrative and technical support positions: administrative services officer, transportation planner and administrative assistant. The executive director serves as the secretary to the CCOG Board. Staffing at CCOG experienced some changes involving the departure of the executive director and the administrative assistant. The executive director separated from CCOG in March 2017. The executive director had been with CCOG since April 2011, having previously served in an adjacent county transportation

planning agency and at CCOG in an administrative and financial services capacity. The administrative service officer had been with CCOG since 2010 and the transportation planner since 2012. The Administrative Services Officer served as interim Executive Director until the position was filled. The transportation planner was promoted to the executive director's position in July 2017. The COG advertised the executive director's position on its website and Facebook page, as well as other industry publications.

With the transportation planner's appointment to executive director, CCOG sought to fill the transportation planner duties by contracting out certain planning and programming tasks. CCOG released a Request for Qualifications (RFQ) on August 30, 2017 for consulting firms to provide consulting services on an on-call basis to provide transportation planning, programming, and project delivery services for a three-year term, ending October 30, 2020. The intent of the RFQ is to enable CCOG staff to augment existing resources by forming a pool of up to three qualified consultants to provide specialized services that are required for executing tasks and projects in identified areas. Three consultant firms were selected for these services.

Internal Planning and Achievements

CCOG continues to work toward addressing new state requirements in areas including climate change and trip reduction, meeting public needs through public transportation, stretching and leveraging transportation fund resources, and maximizing public participation.

During FYs 2014-15 to 2016-17, CCOG accomplished a number of achievements on various projects and studies. Highlights of some of these projects are described below:

2017 Regional Transportation Plan Update: The Regional Transportation Plan (RTP) update was developed during the audit period and adopted in October 2017. The 2017 RTP is a 25-year comprehensive plan guiding transportation policy for the region and makes recommendations concerning improvements to the existing transportation network. It has a financially constrained plan that identifies funding from federal, state, and local sources. The RTP includes an introduction, existing and future conditions as well as policy, action and financial elements. A stakeholder list, public participation plan, conservation assessment and strategies and a list of projects are featured in the appendices. The RTP also cites State greenhouse gas emissions reduction mandates and emphasizes improvements in air quality and public health outcomes. The projects outlined in the action element are consistent with the Federal Transportation Improvement Program (FTIP) and the Interregional Transportation Improvement Program. Outreach to the general public as well as the native tribal governments in the county was documented.

Calaveras County Short Range Transit Plan (SRTP) Update: CCOG commissioned an update to the Calaveras County SRTP, which was finalized in January 2016. The prior

SRTP was adopted in 2009. The aim of the current SRTP update was to evaluate services currently provided by Calaveras Transit and to develop a plan to improve system performance and provision over a five-year horizon. Included as an appendix to the SRTP is the Transit Maintenance and Organizational Analysis Working Paper.

Capital Improvement Program (CIP): Following the implementation of the web-based CIP (<http://ccogcip.com/index.php>), CCOG continued to make enhancements to this transportation project management system database. The CIP database is designed with multiple user access and helps manage projects by fund type and track invoices. With multilayered user access levels, the local and regional agencies can provide public access to specific project information to promote their transparent programming processes. The CIP tool has an automatic e-mail notification feature to advise of deadlines and reports are generated quarterly. In addition, the City of Angels Camp and the County can directly obligate funds. Approximately \$20 million in projects have been identified and tracked in the CIP.

SR 4 Wagon Trail Expressway Project: CCOG expedited the project delivery involving the realignment of a section of SR 4 between Copperopolis and Angels Camp. CCOG has worked with Caltrans and the County through the public outreach process. Several alternatives were identified as meeting the necessary criteria for this \$2.1 million project, which have been advanced to the next stage of development. The Project Approval and Environmental Documentation phase was completed during the audit period. COG staff also invested time and resources during the 2016 STIP process to keep the Wagon Trail project funded amidst statewide funding cuts and elimination of projects. The COG was successful in keeping the project programmed in the STIP and working with Caltrans District 10 on a pilot grant through their Asset Management program.

Amendment to the Transportation Development Act Guidebook: The 2013 guidebook was amended in June 2016 to define the selection process and add guidelines for monitoring the administration of a designated CTSA.

Adoption of Programming Documents: CCOG adopted programming documents such as the RTIP on scheduled intervals to ensure the continued flow of transportation revenue. CCOG programs federal, state, and regional transportation funds for several modes of transportation.

Grant Funding: CCOG has been very successful in obtaining grant funding over the audit period. Over \$667,647 was awarded to the CCOG for San Andreas SR 49 Commercial Gateway and Corridor Study (completed), Mobility Management Grant, and Angels Camp Main Street Plan (completed).

Active Transportation: CCOG completed the Regional Bicycle, Pedestrian, and Safe Routes to School Master Plan including the walkandbikecalaveras.org website. COG staff

worked with various schools and communities on initiating and executing activities and walks including the San Andreas Elementary School Walk to School Day, Mark Twain Elementary School Walk to School Day, as well as the San Andreas Annual Community Health Walk.

Overall Work Program & Allocation Plan

As a conduit for facilitating regional discussion on issues that transcend local jurisdictional boundaries, CCOG serves as a focal point on matters that impact its comprehensive planning program. CCOG develops specific project tasks within work elements of the OWP that address these regional issues.

The Overall Work Program (OWP) serves as CCOG's annual budget and program guide, which is adhered to closely. The introductory chapter discusses the core functions of CCOG, prior year's accomplishments, council and committee structures, regional setting, goods movement, public transportation, aviation facilities, air quality conformity, agency coordination, community engagement, and planning and programming. The work elements are categorized by project according to thematic topics such as Administration and TDA Administration; Regional Planning & Project Programming, Monitoring and Support; Economic Development; Multimodal Transportation Planning and Public Outreach; and City and County projects.

Each element contains a summary of its purpose, previous work performed, proposed tasks, proposed work products, funding sources, and a matrix of funding sources and agency participation. There were 23 work elements in the FY 2014-15 OWP; 19 work elements in the FY 2015-16 OWP; and 18 work elements in the FY 2016-17 OWP. A work program schedule is found toward the end of the OWP, listing the start and end dates for each element.

A prior performance audit recommendation suggested the inclusion of an equivalent allocation of staff time (such as personnel hours/days/months or full-time equivalents) that expresses staff work efforts on each task. The approximate number of staff hours has now been included in the funding sources and agency participation matrix.

The document is subject to federal and state oversight and approval. Pursuant to the Federal Planning Factors in Title 23 of the United States Code, Section 134(f), each work element is measured by eight planning factors contained in the OWP. Those eight planning factors are:

1. Support the economic vitality of the metropolitan area, by enabling global competitiveness, productivity and efficiency.
2. Increase the safety of the transportation system for motorized and non-motorized users.

3. Increase the security of the transportation system for non-motor and motorized users.
4. Increase the accessibility and mobility of people and freight.
5. Protect and enhance the environment, promote energy conservation, improve quality of life and promote consistency between transportation improvements, and state and local planned growth and eco development patterns.
6. Enhance the integration and connectivity of the transportation system across and between modes, people and freight.
7. Promote efficient system management and operation.
8. Emphasize the preservation of the existing transportation system.

Development of the OWP begins in the fall, which involves preliminary oversight and consultation with Caltrans, District 10. Internally, staff members are queried about the specific work elements that they are involved with along with the investment of time and projected funding streams required for implementation. Each element from the prior year's OWP is reviewed and tracked for its completion status. The draft OWP is submitted to Caltrans and the Federal Highway Administration and taken to the CCOG Board in March. The final draft is submitted to Caltrans in June.

The OWP is consistent with the *2015 Regional Transportation Planning Handbook* guidelines prepared by Caltrans. The Handbook describes the respective regional planning roles and responsibilities of the Caltrans District Transportation Planners, the Governor's Office of Research and Planning (OPR) Transportation Planners, Metropolitan Planning Organizations and RTPAs such as CCOG. COG staff prepares quarterly updates on the implementation of the OWP work elements during the fiscal year.

Personnel Management

Personnel management and oversight are conducted by the executive director and administrative services officer. CCOG is an equal opportunity employer and has a merit-based hiring process. Candidates for job openings are recruited through announcements posted in the CCOG office, website, local newspapers and other locations deemed appropriate by the executive director. The Council adheres to the policy of at-will employment and assigns probationary employment status of 26 weeks. The administrative services officer maintains all recruitment files and conducts an orientation meeting with all new employees.

The *CCOG Policies & Procedures Manual* includes sections on job classifications and duties, employment policy, compensation/work schedules, employee benefits, employee expenses, and miscellaneous office policies. CCOG provides health, dental,

vision, and optical insurance plans. CCOG's contribution to the health insurance plan equates to 80 percent of the premium for each employee and their eligible dependents. Dental and vision insurance contributions equate to 100 percent of the total premiums. Health insurance plan options are evaluated annually. Life insurance coverage in the amount of \$50,000 is provided for each employee.

Regular full-time employees with up to three years of service accrue up to 80 hours of annual vacation leave. Those employees with between 3 and 10 years of service accrue up to 120 hours and those with more than 10 years of service accrue 160 hours of annual leave. In addition, regular employees working 50 percent of full-time or more accrue sick leave at the rate of 3.692 hours for each full 80-hour payroll period. Employees accrue sick leave based on regular hours worked and may use sick leave in minimum increments of one half-hour.

CCOG contributes to the California Public Employees' Retirement System (CalPERS). All regular full- and part-time employees working at least 1,000 hours per year are eligible to participate in CalPERS. Under CalPERS, employees are vested after five years of service. CalPERS requires agencies with less than 100 active members in the plan to participate in risk pools. CCOG employees who were members of CalPERS as of January 1, 2013, participate in the Miscellaneous 2% at 55 Risk Pool. New employees hired after January 1, 2013, who were not members of CalPERS would participate in the 2% at 62 risk pool.

CCOG observes the following holidays: New Year's Day, Martin Luther King Jr. Day, Presidents' Day, Memorial Day, Independence Day, Labor Day, Columbus Day, Veterans Day, Thanksgiving Day, and day after Thanksgiving, Christmas Eve, Christmas Day, and New Year's Eve. If a holiday falls on a Saturday, the preceding Friday is observed as a holiday. If a holiday falls on a Sunday, the following Monday is observed as a holiday.

Interviews with Board and SSTAC Members

Phone interviews were conducted with current Board members and representatives from the SSTAC to gauge their perspectives about CCOG's operations and coordination of transit issues. The two Board members who were contacted represent City and County government roles, geographic dispersion, and comparable lengths of service. While the views of the Board members interviewed do not necessarily represent those of the full Board, they provide an additional perspective about CCOG's functionality. A general summary of the Board member responses is shown below:

- The length of service of the Board members interviewed averaged 3.5 years.
- CCOG provides a collaborative approach in its role as a facilitator between the County and the City of Angels Camp and is fair in representing the competing interest of its member agencies.

- The CCOG Board has worked diligently and cooperatively with the City and County despite some challenges with the elected bodies and staff from the respective agencies.
- Staff is highly professional with its duties, easily accessible, nimble, flexible, and creative. Staff has performed well in their areas of expertise.
- Recent changes in the direction of COG policies and administration have been beneficial toward the completion of local transportation projects, setting milestones and successful collaboration with Caltrans.
- CCOG staff has been adept in leveraging financial resources to ensure that projects receive funding.
- CCOG engages the Board in goal-setting on an annual basis and has been following through on meeting these goals.
- Orientation of new Board members involves a one-on-one meeting with the Executive Director and the receipt of a handbook of roles and duties.
- Board packets and financial analysis are of high quality, well presented, and succinct. Board meetings are well-run and productive.
- Board members emphasized the importance of holding member jurisdictions accountable on the issue of project reporting and grant management.
- It was suggested that CCOG staff encourage more dialogue and questions from newly appointed Board members.

Phone and e-mail interviews were also conducted with representatives from the SSTAC responsible for various transit-related tasks. Four representatives provided responses and represented a cross section of special transportation services. In general, all respondents had similar positive sentiments about CCOG's activities, responsiveness, organization and willingness to help. A few concerns and suggestions were also raised. Responses included the following:

- The length of service of SSTAC members interviewed ranges from 3 years to more than 10 years.
- Most SSTAC members queried acknowledged receiving an information binder on the roles and responsibilities of the SSTAC and the COG. A 45-minute formal

orientation process was recommended for new appointees. Another suggestion is for new appointees to be paired with a mentor.

- CCOG staff members conduct themselves very professionally and are knowledgeable, detail oriented, and organized in the execution of duties. Staff is very dedicated and responsive.
- The SSTAC allows for different organizations and interests to discuss the needs of the transit dependent, which helps raise awareness to the CCOG Board.
- CCOG employs a very practical approach to issues and reflects the environment it serves.
- CCOG ensures that the unmet transit needs process is thorough and inclusive. Staff is praised for its implementation of the process and facilitating the discussion of issues. It was suggested that the definition of an unmet transit need be expanded to acknowledge service needs that could be met once funding is identified.³
- When considering transit needs in more remote areas of the county (e.g. West Point), consider the implementation of a volunteer driver program.
- SSTAC meetings are generally well run and productive. Staff is well prepared and organized for the meetings. The meeting agendas are sent out before the meetings in a timely manner.
- Concerns were raised about some political biases detected during the RFP process the COG executed to select a mobility manager. These issues were from individuals on the panel as well as the bidding agency and not COG staff. More neutrality and confidentiality by the panel was iterated by an interviewee.
- While the COG has made a good effort in ensuring a diversity of interests on the SSTAC, there should be an effort to recruit a student or youth representative.
- SSTAC meeting days and times should be more consistent. Make it a goal for the SSTAC to meet quarterly. (It is noted that each year SSTAC adopts an annual meeting schedule which is on a quarterly basis. CCOG stays with that schedule.)

³ While it was suggested that the definition of an unmet transit need be expanded to acknowledge service needs that could be met once funding is identified, the "reasonable to meet" definition cannot be based purely on funding.

- There should be an emphasis on networking between the various service providers represented on the SSTAC. Develop a matrix of transit options available in Calaveras County.

Transportation Planning, Programming, and Regional Coordination

This functional area addresses planning functions required of CCOG, including development of the RTP, the RTIP, and transit planning including performance monitoring and the Short-Range Transit Plan (SRTP) update. Additional transportation programs administered by the agency are also discussed.

Regional Transportation Plan

The RTP is CCOG’s long-range planning document that guides the development of transportation in Calaveras County over a 25-year horizon. The RTP demonstrates how Calaveras County will develop a coordinated and balanced multi-modal regional transportation system that is financially constrained to the revenues anticipated over the life of the plan. The document is updated every four years and is required by state and federal law.

During the audit period, CCOG commissioned the update of the RTP, which was adopted in October 2017. The prior RTP was adopted in October 2012. The RTP update process involved extensive public outreach with an emphasis on improving public health outcomes by fostering policies and projects that encourage physical activity and enhanced air quality. The RTP update is composed of five chapters and four appendices: Introduction; Existing and Future Conditions; Policy Element; Action Element; and Financial Element.

In addition, the appendices included the stakeholder list; Public Participation Plan and public outreach documentation; conservation needs, challenges and recommended strategies; and project lists. The lists of projects are presented in three sub-appendices for roadway capital projects, roadway maintenance projects, and bicycle and pedestrian projects. The total estimated costs for projects over the time horizon of the RTP amount to \$336.5 million.

The 2017 RTP Update guidelines incorporate recent state legislation strengthening the connection between land use, transportation and greenhouse gas emissions. Under SB 743, the California Environmental Quality Act (CEQA) was amended to provide an alternative to Level of Service (LOS) measures for evaluating transportation projects. In January 2016, OPR released draft CEQA guidelines and a technical advisory that changes the primary metric of transportation impacts from LOS to vehicle miles traveled (VMT).

The public engagement process implemented during the RTP update was guided by the adoption of the Title VI Program and Public Participation Plan in May 2015. These

documents provided the framework for public outreach during the development of the RTP Update. The kick-off meeting for the RTP was held on May 11, 2016 in the County Board of Supervisors Chambers. Three community meetings were held in October 2016, January 2017 and February 2017 in San Andreas. The community meetings were followed by presentations during the regularly scheduled CCOG Board meetings held in May, June and August 2017. Each community meeting involved a short presentation describing the RTP development process, a discussion of current transportation priorities, and information on how residents could recommend new projects or solutions to transportation issues. A dedicated website was created for the RTP Update (<http://calaverasrtp.com/>).

Regional Transportation Improvement Program

The RTIP is a document used by local jurisdictions throughout California to nominate transportation projects for funding under the State Transportation Improvement Program (STIP). The Calaveras County RTIP is generally developed in coordination with neighboring Alpine and Amador Counties pursuant to a 1997 Memorandum of Understanding. CCOG worked jointly with those neighboring counties as part of the Tri-Counties partnership for the 2014 RTIP cycle. During the audit period, CCOG submitted the 2016 Calaveras County RTIP, which has a five-year programming horizon covering FY 2016-17 through FY 2020-21.

CCOG submitted its RTIP to the State as part of the 2016 STIP process in December 2015. In January 2016, the California Transportation Commission (CTC) released its revised fund estimate, which forecasted lower than projected STIP revenues. The project of primary significance programmed into the 2016 RTIP was the SR-4 Wagon Trail Expressway. Despite the funding shortfall in the STIP, Caltrans District 10 secured a State Highway Operations and Protection Program (SHOPP) Pilot Program award in the amount of \$10.32 million. As a result, CCOG was able to secure the Wagon Trail project in the STIP; however, the region's apportionment was reduced by \$1.5 million.

In addition to the SR-4 Wagon Trail Project, the 2016 RTIP included COG planning, programming, and monitoring. According to the 2017 Summary of STIP County Shares, Calaveras County's share as of June 30, 2017 was \$6.834 million, of which \$5.125 million was programmed toward the SR-4 Wagon Trail Expressway.

An issue CCOG has had with administering funds for City and County projects is project delivery and timely use of funds. Caltrans developed guidelines describing the policy and procedures necessary to implement the timely use of funds provisions outlined in AB 1012. Assembly Bill 1012 (Chapter 783 of the Statutes of 1999) was enacted with a goal of improving the delivery of transportation projects. The roles and responsibilities for the timely use of funds are delineated in statute and are shared by Caltrans, regional agencies, and the California Transportation Commission. Funding sources such as CMAQ and RSTP that are not obligated within the first three years of federal eligibility are

subject to reprogramming by the California Transportation Commission in the fourth year. Regional agencies like CCOG are responsible for obligating the funds within the three-year time period and developing a plan for those funds remaining unobligated in the third year. CCOG should implement the timely use of funds guidelines and enforcement of funding timelines.

Transit Planning including Performance Monitoring and the Transit Development Planning Process

The Calaveras County Short Range Transit Plan (SRTP) Update was undertaken and finalized in January 2016. The prior SRTP was adopted in 2009. The aim of the current SRTP update was to evaluate services currently provided by Calaveras Transit and to develop a plan to improve system performance and provision over a five-year horizon.

The SRTP is composed of an executive summary; introduction; an analysis of existing and future transit needs, fares, services and performance; goals and performance standards; organizational assessment; service plan alternatives; financial assessment and plan; recommended service plan; and a marketing plan and recommendations. Included as an appendix to the SRTP is the Transit Maintenance and Organizational Analysis Working Paper. The purpose of the Transit Maintenance and Organizational Analysis is to determine what cost elements are responsible for the higher than average operating cost per vehicle service hour in comparison with comparable rural transit systems.

The key findings and recommendations of the SRTP Update are summarized as follows:

- A new organizational structure, the Calaveras Transit Agency, would allow transit to reach its full potential in meeting customer mobility needs in a more cost-effective manner.
- To provide the necessary revenues for needed service expansion, utilize all applicable LTF revenues for transit purposes.
- Implement a service monitoring program that will use recommended performance standards to ensure that any phased expansion of service is financially sustainable over time.
- Adopt a new mission statement:

To provide safe and cost effective public transportation services throughout Calaveras County to serve the mobility needs of residents and visitors who need public transportation.

In an effort to implement the findings and recommendations contained in the SRTP Update, the County Board of Supervisors adopted the Calaveras Transit Service Plan in January 2017. The goal of the Calaveras Transit Service Plan is to provide an efficient

system of convenient bus routes and schedules designed to maximize ridership and passenger convenience. Subsequent to the Plan's adoption, County staff rebranded the routes from a numbered to a color designation; modified the Saturday Hopper schedule to include service to Arnold and reduce the number of stops in Valley Springs; changed the Saturday Hopper base fare to \$3.00 and allow for the use of monthly passes on Saturdays; and modified the Delta Gold Line schedule to facilitate better connections in the county. The Delta Gold Line service was eventually discontinued in July 2017.

CCOG provides a platform and forum for transit service planning and performance issues through the Interagency Transit Committee (ITC), which is composed of transit managers and administrators. The City of Angels Camp is represented by its planning director. The transit committee is staffed by CCOG, which distributes agendas and records minutes. The goal of the committee is to meet on a quarterly basis. CCOG reports that the body is not as effective as it could be due to the lack of timely performance data and reporting. Transit operations are generally reported verbally without hard performance information that has been validated or checked for accuracy. Although regular performance data has been provided by the contract operator to the County, the reports have not been received timely by the ITC.

Alternative Transit Governance Considerations

Regarding the future administration and oversight of Calaveras Transit, the County initiated a discussion in September 2017 on exploring the development and feasibility of an alternative organizational structure for the transit system. The CCOG Board provided staff direction to work with the respective City and County liaisons to identify next steps and approaches. The Board also directed staff to include funding in the CCOG FY 2017-18 Overall Work Program Amendment No. 1 for consultant services to assist in facilitating and guiding the process.

The City and County liaisons, along with staff from CCOG and the County Public Works Department met on September 21 to discuss goals for the process and next steps moving forward. Consensus was reached by the group to move forward with exploring an alternative organizational structure that involves the formation of a transit agency through a Joint Powers Agreement (JPA). CCOG released a Request for Proposals on September 26, 2017 for consulting firms to facilitate and assist in a transition plan for the transit system and formation of a JPA.

One qualified proposal was received, which was subject to review and comment by the liaisons and CCOG staff on October 23, 2017. There was consensus and support to recommend the contract award to the sole bidder. The consultant has been working with the City and County on the development and feasibility of an alternative organizational structure from a County administered transit service to a JPA between the City of Angels and the County. The City Council and County Board of Supervisors adopted the JPA in February of 2018.

Active Transportation Program

In September 2013, the Governor signed legislation (Assembly Bill 101 and Senate Bill 99) creating the Active Transportation Program (ATP). The ATP consolidates existing federal and state transportation programs, including the Transportation Alternatives Program, Bicycle Transportation Account, and state Safe Routes to School, into a single program. The ATP is administered by Caltrans' Division of Local Assistance, Office of Active Transportation and Special Programs. The purpose of the ATP is to encourage increased use of active modes of transportation by achieving the following goals:

- Increase the proportion of trips accomplished by biking and walking.
- Increase safety and mobility for non-motorized users.
- Advance the active transportation efforts of regional agencies to achieve greenhouse gas reduction goals.
- Enhance public health.
- Ensure that disadvantaged communities fully share in the benefits of the program.
- Provide a broad spectrum of projects to benefit many types of active transportation users.

Funding for ATP projects is granted on a competitive basis. In response to this legislation, CCOG embarked on the development of its own ATP with the hiring of a volunteer coordinator with a background in public health as well as created a website: Walk-Bike Calaveras (<http://www.walkandbikecalaveras.org/>). Walk-Bike Calaveras is cited as resource to help residents and visitors take advantage of the many transportation options and resources in Calaveras County.

TDA Claimant Relationships and Oversight

As the designated RTPA, CCOG is responsible for the administration of the TDA program. This functional area addresses CCOG's administration of the provisions of TDA. The subfunctions described include costs for TDA administration and transportation planning, TDA claims processing and related technical assistance, and the unmet transit needs process.

CCOG Administration and Planning

The uses of TDA revenues apportioned to Calaveras County flow through a priority process prescribed in state law. The LTF allocations are distributed to the jurisdictions based on the latest population figures from the California Department of Finance. In order of priority, LTF funds are allocated as follows:

- TDA fund administration
- City and County planning projects
- Bicycle and pedestrian facilities
- Public transit (Articles 4 and 8)
- Streets and roads (Article 8)

Prior to apportionment of funds to the Bicycle and Pedestrian Facilities Program and the County, CCOG is able to claim TDA revenues for administration of the fund and for regional transportation planning and programming purposes. During the audit fiscal years of 2015 through 2017, CCOG claimed the amounts shown in Table IV-2 below.

Table IV-2
LTF Revenue Claims by CCOG for
Administration and Planning

Fiscal Year	LTF Claim *
2015	\$249,749
2016	\$403,597
2017	\$275,174

** Excludes LTF carryover and reserves from prior years. These amounts include both administration as well as funding directly for City and County planning projects and grants.*

Source: STA and LTF audited financial statements for CCOG

Technical and Managerial Assistance to Operators

CCOG provides technical assistance to claimants. One of the tools utilized is the CCOG *Transportation Development Act Guidebook*. The Guidebook is composed of two volumes: 1) TDA Overview and Background and 2) CCOG TDA Claims Process. In addition to the two volumes, the appendices provide sample claim forms and a glossary. The guidebook was amended in June 2016 to define the selection process and add guidelines for monitoring the administration of a designated CTSA.

Staff provide remedial assistance to the County regarding the claim submittal process. CCOG has been receiving inaccurate and incomplete claim information from the County, which administers Calaveras Transit. This prompted CCOG to approve conditional LTF allocations and reduced funding using annualized actuals.

The County Public Works Department generally provides the required documentation pursuant to CCOG policy for review and approval. However, supplementary information provided does not conform to TDA requirements. As shown in County staff reports submitted to the COG, the claims do not conform to the Board of Supervisors adopted

annual budgets. In addition, the County’s Transit Operator Financial Transactions Report was filed beyond the submittal deadline to the State Controller, excess carryover funds were not reported, and the capital revenue and expenditures reflected in the transit budget did not match the programmed transit capital projects reflected in the Public Transportation Modernization, Improvement and Service Enhancement Account (PTMISEA) Program Expenditure Plan.

TDA Claim Processing

On an annual basis during this audit period, CCOG was responsible for managing the apportionment of between \$846,000 and \$972,000 in LTF revenues and between \$155,000 and \$224,000 in STA funds. During the audit fiscal years of 2015 through 2017, the following amounts of LTF and STA funds were apportioned to Calaveras County claimants as shown in Table IV-3.

**Table IV-3
Total TDA Funding Allocation**

Fiscal Year	Local Transportation Fund	State Transit Assistance	Total
2015	\$846,304	\$223,549	\$1,069,853
2016	\$883,405	\$174,073	\$1,057,478
2017	\$972,253	\$154,924	\$1,127,177

Source: CCOG

CCOG receives a letter from the County Auditor regarding the initial LTF revenue projections in February. The Board and TAC are apprised of the LTF apportionment and a budget analysis is conducted during the TAC meeting. There is no agreement between the County and the City regarding the transit allocation. Apportionment by population does not occur until after the County receives its allocation for the transit system.

CCOG prepares and distributes several documents during the TDA claims process. The documents include the initial and final estimates of apportionment less CCOG administration expense to each jurisdiction and a packet providing claimants with the necessary forms and funding information needed to prepare TDA claims. CCOG’s claimant instructions can authorize that payments be made annually, as money becomes available or on a quarterly basis. Since the RTPA is allowed to set the parameters for payment, CCOG could also authorize payments in arrears based on actual expenses. CCOG currently authorizes claim payments as money becomes available.

As a rule, operator claims must include supplemental information of a number of TDA requirements, including attachment of specific documentation such as the budget, prior year revenues and expenditures, California Highway Patrol terminal inspection

certification, Statement of Conformance, and transit efficiency calculation if the operator chooses to use STA monies for operations.⁴

Unmet Transit Needs

Unmet transit needs hearings are required by the TDA where claims can be made for streets and roads. CCOG provides definitions and parameters to guide this process. During the audit period, CCOG conducted a thorough unmet needs process involving public hearings and SSTAC analysis. Notices for public hearings are properly advertised in the *Calaveras Enterprise*, the local newspaper of general circulation, community websites such as the Pine Tree.Net (<http://thepinetree.net/>), and on Calaveras Transit vehicles. Public hearings are also conducted during the City of Angels Camp Council meetings. Meetings have generally been held in Angels Camp and San Andreas. Two public hearings were conducted during the FY 2014-15 and FY 2015-16 unmet transit needs process and only one public hearing was conducted in FY 2016-17.

Staff prepares an Unmet Transit Needs Finding Report, which encompasses an overview of TDA, service area demographics, an analysis of existing transit services, community outreach and public comment, and the unmet transit needs findings and recommendation. The report includes a Board resolution approving the annual unmet transit needs findings. Data on transit-dependent population are drawn from the 2010 US Census and the 2014 American Community Survey. CCOG is assisted in making this finding by the SSTAC, which reviews each comment and makes recommendations on its status as an unmet need. Recommended findings by the SSTAC are included in the staff report. The definitions of an unmet transit need and reasonable to meet utilized during the audit period are presented as follows:

UNMET TRANSIT NEED:

Public transit or specialized transportation services not currently provided for persons in Calaveras County who have no reliable, affordable, or accessible transportation for necessary trips. Necessary trips are defined as those trips which are required for the maintenance of life, education, access to social service programs, health, and physical and mental well-being, including trips which serve employment purposes. The size and location of the group must be such that a service to meet their needs is feasible within the definition of “reasonable to meet” as set forth below.

Unmet needs may include needs for transportation services which are identified through the annual unmet transit needs process, or by the SSTAC, which are not yet implemented or funded. The consideration of unmet transit needs is not limited to the

⁴ The transit efficiency calculation required under PUC 99314.6 to use STA revenue for operations was temporarily suspended by state legislation until FY 2014-2015. AB 1113 reinstates the efficiency test under modified provisions.

above-mentioned methods. It is the practice of CCOG to consider input relative to transit needs from any group or member of the public wishing to express such needs.

The definition excludes:

1. Minor operational improvements or changes, involving issues such as bus stops, schedules, and minor route changes which are being addressed by routine or normal planning process;
2. Improvement funded or scheduled for implementation in the fiscal year following the Unmet Transit Needs Hearing; and
3. Future transportation needs.

REASONABLE TO MEET:

“Reasonable to meet” is established according to the following criteria:

- A. Financial Feasibility.** 1) The proposed transit service, if implemented or funded, would not cause the responsible operator or service claimant to incur expenses in excess of the maximum allocation of TDA funds, STA funds, FTA 5311 funds, and other transit-specific monies as may become available. 2) The proposed service, if implemented or funded, would not affect the responsible operator or service claimant’s ability to meet the required system-wide farebox revenue-to-operating cost ratio of 10 percent. 3) Proposed transit system expansion must be monitored and evaluated after six months of operation (or other approved period of review) by the CCOG Board.
- B. Cost Effectiveness.** Supporting data demonstrates that sufficient ridership and revenue potential exists for the new, expanded, or revised transit service to meet or exceed the required farebox revenue-to-operating cost ratios on a stand-alone basis; except in case of an extension of service determined to be a necessary lifeline service for transit-dependent populations. Furthermore, cost-per-passenger is reasonable when compared to the level of service provided, benefit accrued to the community, and existing service cost-per-passenger.
- C. Community Acceptance.** There is sufficient public support for the proposed transit service, as indicated through the annual public hearing process.
- D. Equity.** The proposed transit service would benefit either the general public or the elderly and disabled population as a whole. Transit service will not be provided favoring one group at the exclusion of any other.
- E. System Impact.** It has been demonstrated to the CCOG Board that the proposed transit service combined with existing service will allow the system to meet or exceed performance standards such as the cost-per-passenger trip, cost-per-

service-hour, passenger trips-per-service hour, passenger trip-per-service-mile, on-time performance, and vehicle service hours-per-employee. The proposed service does not duplicate transit services currently provided either publicly or privately. The proposed service is in response to an existing rather than a future need.

F. Operational Feasibility. There are adequate roadways and turnouts to safely accommodate transit vehicles.

G. Availability of Services Provided. A qualified contractor is available to implement the service.

During the audit period, there was only one unmet transit need that was reasonable to meet along with a number of additional recommendations for service enhancements. The Unmet Needs Findings for FY 2014-15 identified fixed route service to the community of Burson. Overall, four unmet transit needs were identified. The service to Burson was implemented in May 2015.

For FY 2015-16, there were no unmet transit needs identified as reasonable to meet but the SSTAC forwarded three additional recommendations for further consideration. The recommendations involved having more cost effective alternative service options to the West Point area; additional service to Copperopolis; and a bus stop and facilities at Copello Road and SR-49 in Angels Camp.

For FY 2016-17, like the prior year, there were no unmet transit needs identified as reasonable to meet. However, the SSTAC forwarded seven recommendations which involved focused outreach to smaller and remote communities such as Burson, Copperopolis and West Point; coordination with local social service providers to align public transit service with medical appointments and work schedules; additional marketing and outreach regarding Calaveras Transit route deviations; and increased service frequencies to Columbia College and later bus service to better meet class schedules.

Upon conclusion of the unmet needs process, CCOG submits all documentation to Caltrans as evidence of conducting the hearings and incorporating the recommendations of the SSTAC. Updates on services implemented as the result of an unmet transit need finding are analyzed in the Unmet Transit Needs Finding Report.

Public Information and Alternative Transportation

CCOG has been active in communicating its mission and role to the region as well as forging partnerships with other agencies in neighboring counties. CCOG has developed a comprehensive outreach effort to elicit support for its mission and to educate the public of its role in the delivery and maintenance of transportation infrastructure. CCOG's public affairs and community engagement are conveyed through its website, publications, and public presentations.

The CCOG website (<http://calacog.org/>) provides an extensive array of information about CCOG's projects and programs, its structure and governing body, and upcoming meetings and workshops. It contains the names, e-mail addresses, and phone numbers for staff, CCOG's current planning documents, regional transit links, and air quality conformance. On a separate portal accessed through the main website, Board and Technical Advisory Committee meeting agendas and minutes are posted and able to be downloaded (<http://ccogca.iqm2.com/Citizens/default.aspx>). The website was redesigned during the audit period.

With regard to social media engagement, CCOG has a Facebook page that can be accessed from the website. Facebook is used to post employment and committee vacancies, Caltrans and Calaveras County transportation updates. As of this writing, the Facebook page has 193 likes and 194 follows.

As described earlier, CCOG embarked on promoting the ATP through its Walk-Bike Calaveras initiative and website. One way that active transportation is promoted is through focused outreach to local school districts and providing marketing support to Calaveras Transit and the unmet transit needs process. CCOG has also done several diverse types of outreach including the following:

- Participating in career fairs at both local High Schools
- Participating at family day and health fairs
- Participating in the local Calaveras County Chamber of Commerce Events
- Engaging and informing public on the Calaveras Council of Governments Facebook page
- Posting meetings and information on the local website www.thepinetree.com
- Posting meetings and information in the Calaveras Enterprise newspaper
- Implementation of press releases to the media

CCOG held a Funding 101 workshop in 2015 for the COG Board and committee members, which was also open to the public. In addition, a policy conference was held the same year and featured panel discussions with local elected officials. CCOG is also

considering an annual report to highlight its accomplishments and role in the community.

Pursuant to the federal Civil Rights Act of 1964, CCOG has an adopted Title VI Program. As was mentioned previously in this section, CCOG updated its Title VI Program in May 2015. Title VI of the Civil Rights Act of 1964 requires that no person in the United States, on the grounds of race, color, or national origin be excluded from, be denied the benefits of, or be subjected to discrimination, under any program or activity receiving federal financial assistance. The Title VI policies and complaint forms are available on the CCOG website in English and Spanish. Included as an appendix, the Public Participation Plan describes the various approaches to public engagement that the CCOG is committed to. The plan also cites the federal and State requirements that apply to CCOG requiring public participation processes.

Grant Application and Management

As a transportation funding agency, CCOG serves a significant role in administering grant-related revenues for the region. Whether for public transit, highways and roadways, or bicycle and pedestrian, CCOG typically has some degree of involvement with funding of transportation projects through coordination, planning, and/or programming.

CCOG serves as the clearinghouse for federal grant applications that are reviewed to determine whether there is any duplication of effort among agencies and that there is no conflict with local plans and policies. CCOG's role for Calaveras County is to review and be an integral part of state and federal funding assistance that promotes interjurisdictional coordination. Grant development is an ongoing work element the annual OWP involving a number of tasks and work products.

The administrative services officer is responsible for grant management, and the transportation planner (now outside consultants) is involved in monitoring, scope of work, milestones, and reporting. CCOG staff compiles a binder for each grant award and project. Each binder contains the grant award letter, request for proposal, invoices, contract, and monitoring documentation. CCOG provides application and programming support to the County transit program for Federal Transit Administration (FTA) grant programs as well as for CalOES and PTMISEA state grant programs toward operations, planning, and capital projects.

During the audit period, CCOG was instrumental in facilitating the award and execution of grants for local recipients and projects. In July 2014, the Calaveras County Board of Supervisors approved a Subrecipient Agreement between the County and CCOG for the management and delivery of projects programmed and allocated through the PTMISEA program. In October 2014, the County Board of Supervisors approved a list of transit projects totaling \$1,008,886 to be submitted to CCOG for funding through PTMISEA.

As part of its mobility management coordination efforts, CCOG facilitated an FTA Section 5310 grant application on behalf of a local non-profit for the purchase of a medium-sized bus in November 2016. CCOG was also able to certify and assure that the project was included in its Coordinated Public Transit-Human Services Transportation Plan and met the eligibility requirements for the FTA Section 5310 program.

During the 2016 STIP process COG staff kept the Wagon Trail project funded amidst statewide funding cuts and elimination of projects. COG was successful in keeping the project programmed in the STIP and working with Caltrans District 10 on a Pilot grant through their Asset Management program. CCOG was also successful in obtaining several Caltrans Planning Grants, as well as partnerships with other regions such as the Zero Emissions Vehicle Readiness Plan with Tuolumne County Transportation Council. Over \$667,647 was awarded to the CCOG including for the SR-49 Gateway Corridor Plan; mobility management grant; Angels Camp Main Street Plan; and SR-49 Commercial Gateway Corridor Study. CCOG conducted a Call for Projects which programmed four years of CMAQ, RSTP, and LTF for local transportation construction projects. In addition, staff furthered the development of the online CIP database.

Section V

Findings and Recommendations

The following material summarizes the findings obtained from the triennial audit covering FYs 2015 through 2017. A set of audit recommendations is then provided.

Findings

1. CCOG conducts its management of the TDA program in a competent, professional manner while operating in a complex intergovernmental environment.
2. CCOG has satisfactorily complied with its applicable state legislative mandates for RTPAs. Compliance mandates that were not applicable to CCOG during the audit period include the adoption of regulations for the evaluation of claims under Article 4.5 of the TDA (there were no such claims), and the establishment of an urban transit farebox recovery ratio. A recent fiscal audit for Calaveras Transit was submitted to CCOG and to the State slightly after the allowed extension period.
3. CCOG fully implemented four of the five prior performance audit recommendations. One recommendation was partially implemented and is carried forward in this audit concerning the County's accountability toward compliance with provisions of the TDA such as farebox recovery attainment and claim submittal procedures. The four recommendations fully implemented pertained to following up on transit services funded through the unmet needs process, amending the *CCOG Policies & Procedures Manual*, exploring the potential for designating a Consolidated Transportation Services Agency, and pursuing mobility management services.
4. During the audit period, staffing at CCOG experienced some changes involving the departure of the executive director and the administrative assistant. The executive director separated from CCOG in March 2017. The Administrative Services Officer served as Interim Executive Director from March to July. The transportation planner was promoted to the executive director's position in July 2017. Further, transportation planning duties were contracted with on-call consultants.
5. The 2017 Regional Transportation Plan (RTP) was developed during the audit period and adopted in October 2017. The 2017 RTP is a 25-year comprehensive plan guiding transportation policy for the region and makes recommendations concerning improvements to the existing transportation network. The RTP also cites State greenhouse gas emissions reduction mandates and emphasizes improvements in air quality and public health outcomes.

6. CCOG expedited project delivery for SR-4 Wagon Trail Expressway Project between Copperopolis and Angels Camp. CCOG has worked with Caltrans and the County through the public outreach process. The Project Approval and Environmental Documentation phase was completed during the audit period.
7. Board and SSTAC members have expressed a high confidence in CCOG staff members and their competence, knowledge, and responsiveness to requests. CCOG has proven adept in project programming and delivery.
8. The *CCOG Policies & Procedures Manual* underwent seven amendments during the audit period. The amendments include the Executive Director job description being moved to the appendices, adoption of the Conflict of Interest Code and Social Media Standards and Procedures, Title VI Program Update and the Catastrophic Leave Program and Donation Policy.
9. In response to State legislation creating the Active Transportation Program (ATP), CCOG developed its own ATP with the hiring of a volunteer coordinator with a background in public health as well as created a website: Walk-Bike Calaveras.
10. CCOG provides a platform for transit service planning and performance review through the Interagency Transportation Committee composed of local agency and transit staff members. CCOG commissioned an update to the Calaveras County SRTP, which was finalized in January 2016. The aim of the current SRTP update was to evaluate services currently provided by Calaveras Transit and to develop a plan to improve system performance and provision over a five-year horizon.
11. There was only one unmet transit need that was reasonable to meet along with several additional recommendations for service enhancements during the audit period. The Unmet Needs Findings for FY 2014-15 identified fixed route service to the community of Burson as being reasonable to meet.
12. CCOG's public affairs and community engagement are conveyed through its website, publications, and public presentations. The CCOG website (<http://calacog.org/>) provides an extensive array of information about CCOG's projects and programs. Committee meeting agendas and minutes are posted and able to be downloaded (<http://ccogca.iqm2.com/Citizens/default.aspx>). The website was redesigned during the audit period and added a Facebook social media page.
13. CCOG held a Funding 101 workshop in 2015 for the COG Board and committee members, which was also open to the public. In addition, a policy conference was held the same year and featured panel discussions with local elected officials. CCOG is also considering an annual report to highlight its accomplishments and role in the community.

14. CCOG serves a significant role in administering grant-related revenues for the region. The administrative services officer is responsible for grant management, and the transportation planner (on-call consultants) is involved in monitoring, scope of work, milestones, and reporting. CCOG was instrumental in facilitating the award and execution of grants for local recipients and projects through the PTMISEA and the FTA Section 5310 programs. CCOG was also successful in obtaining several Caltrans Planning Grants, as well as partnerships with other regions such as the Zero Emissions Vehicle Readiness Plan with Tuolumne County Transportation Council. CCOG conducted a Call for Projects which programmed four years of CMAQ, RSTP, and LTF for local transportation construction projects. In addition, staff furthered the development of the online CIP database.

Triennial Audit Recommendations

1. Continue to partner and identify mobility management strategies.

CCOG, in implementing a prior recommendation regarding actions taken to promote mobility management, has worked with a local non-profit in securing a mobility management grant. The update of the Coordinated Plan and the JPA formation to administer public transit services in Calaveras County may allow for additional opportunities to partner for implementation of mobility management strategies. Interviews with SSTAC members revealed an emphasis on networking between the various service providers represented on the SSTAC. Some suggestions included developing a matrix of transit options available in Calaveras County and the implementation of a volunteer driver program. CCOG should continue partnering and working to identify strategies that address a full range of well synchronized mobility services within the County.

2. Ensure further accountability toward compliance with provisions of the TDA such as farebox recovery attainment and claim submittal procedures.

It was noted that CCOG has continued to hold the County accountable for compliance with its TDA claim submittal. CCOG requires that TDA claims be certified by the County Auditor-Controller pursuant to CCR Section 6632. All modifications to the budget or claims must be submitted to allow adequate review time by the Technical Advisory Committee. Nevertheless, there have been ongoing challenges with the accuracy and timeliness of the County's claim. CCOG has had to approve conditional claims due to discrepancies and lack of timeliness in the submittal of the initial TDA claim. Regarding the monitoring of performance trends, the County transit staff have not been diligent in reporting data to CCOG, in particular to the Interagency Transit Committee (ITC), or to the County Board of Supervisors. Although the contract operator for Calaveras Transit routinely prepares monthly reports including ridership statistics for each run and stop, County staff have not routinely analyzed and reported the data to CCOG. It is anticipated with the formation of the JPA to administer the transit system that TDA compliance will improve regarding consistent performance monitoring and claim procedures. It is also recommended that further accountability be attained through the regular reporting and analysis of transit performance data to the ITC.

3. Consider the appointment of a student representative on the SSTAC.

CCOG upholds the composition of the SSTAC is representative of the categories pursuant to PUC Section 99238 of the TDA. Given the rural profile of Calaveras County and the transit service area, CCOG has done a commendable job of recruiting and retaining members to the SSTAC. While position vacancies do occur, most of the categories have been represented. TDA allows discretion for CCOG to appoint other

representatives above those required by statute, including those of limited means. CCOG already appoints one member at-large position. A suggestion would be to expand the at-large membership and recruit and appoint a student representative to the SSTAC. Based on the 2016 Calaveras County SRTP, students are Calaveras Transit's largest market at 48 percent of all riders (Columbia College students comprise 70 percent of student ridership). Such an appointment would give a voice to an important segment of the transit dependent population in the discussion of transit coordination. Some incentives for recruitment might include offering free transportation to and from the unmet needs hearings and meetings or a free transit pass for the member's service. A number of RTPA's recruit youth/student members to their SSTAC's in engaging this large ridership group.

4. Update the new appointee orientation for the SSTAC.

During interviews with SSTAC members, it was indicated that new appointees receive a handbook to review; however, an orientation with COG staff to review the handbook was not generally conducted. In comparison, new members appointed to the COG Board generally go through an orientation process composed of a one-on-one session with the CCOG executive director and receipt of a Board handbook. A suggestion that was brought during the interviews was for COG staff to offer an orientation, whether one-on-one or in a small group, along with the handbook to new SSTAC appointees. In addition, COG can offer the opportunity for a new member, if he/she desired, to be paired with a more experienced member for a time period to offer assistance and advice on COG issues, roles, and meeting protocol from a committee member perspective. Alternatively, in lieu of or in addition to the orientation, another suggestion would be to hold an annual Funding 101 workshop during one of the committee meetings so that all members are up to speed on COG responsibilities.

5. Implement "timely use of funds" guidelines and enforcement.

An issue CCOG has had with administering funds for City and County projects is project delivery and timely use of funds. Caltrans developed guidelines describing the policy and procedures necessary to implement the timely use of funds provisions outlined in AB 1012. Assembly Bill 1012 (Chapter 783 of the Statutes of 1999) was enacted with a goal of improving the delivery of transportation projects. Funding sources such as CMAQ and RSTP that are not obligated within the first three years of federal eligibility are subject to reprogramming by the California Transportation Commission in the fourth year. Regional agencies like CCOG are responsible for obligating the funds within the three-year time period and developing a plan for those funds remaining unobligated in the third year. CCOG should implement the timely use of funds guidelines and enforcement of funding timelines.

6. Develop format and content for an annual CCOG report.

Despite its limited staffing resources, CCOG’s public engagement efforts have been quite extensive encompassing community outreach and meetings, website development, press releases and social media updates. The executive director mentioned the possibility of developing an annual report. An annual report is intended to encapsulate the activities and value that CCOG brings to the community through its mission and transportation coordination, planning, programming, financial, and project delivery responsibilities. In addition, an annual report identifies the projects and outcomes for the community as well as educates the public and stakeholders on CCOG’s role in transportation. Many RTPAs develop annual reports that serve such a purpose to highlight the accomplishments and challenges for the year, and what to look forward to in the next year. This has been a desire of CCOG and should be explored further.