



CALAVERAS COUNCIL *of* GOVERNMENTS

# FY 2018-2020 TRIENNIAL PERFORMANCE AUDIT OF THE CALAVERAS COUNCIL OF GOVERNMENTS



**October 2021**

Submitted to:  
**Calaveras Council of Governments**

Submitted by:

**Michael Baker**  
INTERNATIONAL

# TABLE OF CONTENTS

<b>Executive Summary</b> .....	i
<b>Section I</b> .....	1
Introduction – Initial Review of CCOG Functions .....	1
Overview of CCOG and Calaveras County .....	1
<b>Section II</b> .....	8
RTPA Compliance Requirements .....	8
<b>Section III</b> .....	18
Prior Triennial Performance Audit Recommendations .....	18
<b>Section IV</b> .....	23
Detailed Review of RTPA Functions .....	23
Administration and Management .....	23
Transportation Planning and Regional Coordination .....	31
TDA Claimant Relationships and Oversight .....	36
Public Information and Alternative Transportation .....	42
Grant Application and Management .....	43
<b>Section V</b> .....	45
Findings .....	45
Recommendations .....	48

## **Executive Summary**

Michael Baker International (Michael Baker) was retained by the Calaveras Council of Governments (CCOG, COG, Council) to conduct its Transportation Development Act (TDA) performance audit for fiscal years 2017–18 through 2019–20. As a Regional Transportation Planning Agency (RTPA), the 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 nonmotorized forms of transportation.

This performance audit is intended to describe how well the CCOG is meeting its administrative and planning obligations under the 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 the 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**

The 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.

The CCOG was instrumental in the formation of the Calaveras Transit Agency (CTA). The CTA was created under a joint powers agreement (JPA) executed between the County of Calaveras and City of Angels Camp. The final adopted JPA was signed on March 6, 2018 and implemented on July 1, 2018. The governing board of the CTA is the same as the governing board of the CCOG. The executive director of the CCOG also serves as the executive director of the CTA. A Professional Services Agreement was executed between the CTA and the CCOG on April 1, 2018 staffing services.

Since the CTA assumed administrative oversight of the County’s transit system, TDA claim procedures and reporting protocols have been in conformance with the CCOG TDA

Policies and Procedures and TDA statute. The CTA staff is composed of CCOG staff, which is tasked with the annual allocation of TDA funding and processing of claims. Therefore, the TDA claim form for transit services is prepared internally with distinct roles assigned to staff. To its credit, the CCOG has complied with the TDA requirements using relatively limited staff resources to implement the various programs in the TDA statute.

### **Status of Prior Audit Recommendations**

The CCOG satisfactorily implemented four of the six prior performance audit recommendations. One recommendation was partially implemented concerning the appointment of a student representative to the SSTAC. The recommendation not implemented involved developing a format and content for an annual CCOG report, which does not impact overall compliance with the TDA statute. The four recommendations satisfactorily implemented pertained to partnering and identifying mobility management strategies; updating the new appointee orientation for the SSTAC; furthering accountability toward compliance with provisions of the TDA; and implementing “timely use of funds” guidelines and enforcement.

### **Functional Review**

1. The CCOG conducts its management of the TDA program in a competent, professional manner while operating in a complex intergovernmental environment.
1. 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 current executive director was appointed by the board in July 2017. The administrative services officer, who served as interim executive director, separated from the COG in January 2020. The current administrative services officer joined the COG in February 2020, having previously been employed by the Calaveras County Auditor-Controller. The administrative assistant has been with the COG for four years.
2. CCOG was instrumental in the formation of the CTA. The CTA was formed under a JPA between the City of Angels Camp and the County of Calaveras on March 6, 2018. The CTA assumed full responsibility for administration of the public transit system from County management on July 1, 2018. The governing board of the CTA is the same as the CCOG.
3. The 2017 RTP was 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 CCOG initiated an update to the RTP during the audit period. The 2021 RTP update includes a 20-year vision of policies and regionally significant improvements.

The goals established for the 2021 RTP address safety, the environment, equity, and climate change.

4. The CCOG prioritized project delivery involving the realignment of a section of SR 4 between Copperopolis and Angels Camp. The funding strategy established and executed during the audit period for delivering the project was to focus on advancing the western segment from Bonanza Mine Way to Appaloosa Road to “shovel ready” status with the goal of attracting state and federal funding.
5. 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.
6. The *CCOG Policies and Procedures Manual* serves as an orientation guide for new CCOG members and employees as well as providing an operational guide and bylaws concerning procedures and activities to ensure the smooth and proper execution of CCOG-related business. The manual underwent two amendments during the audit period (September 2018 and June 2019) as well as a subsequent amendment in October 2020.
7. In response to state legislation creating the ATP, the CCOG developed its own ATP with the creation of a volunteer position with a background in public health as well as creating a website called Walk-Bike Calaveras and working with local school districts on creating walking and biking educational programs for the students.
8. The CCOG provides a platform for transit service planning and performance review through the CTA and SSTAC. The CCOG commissioned an update to the Calaveras County SRTP, which was finalized in January 2021. The prior SRTP was adopted in 2016. The aim of updating the SRTP was to evaluate services currently provided by Calaveras Connect and develop a plan to improve system performance and provision over a five-year horizon.
9. There were no unmet transit needs that were reasonable to meet during the audit period. However, the Unmet Transit Needs Findings Report did include several additional recommendations for service enhancements made each year of the unmet transit needs process.
10. The 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 its 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 updated during the audit period and includes a link to a Facebook social media page.

11. The 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 is involved in monitoring, scope of work, milestones, and reporting. As part of its mobility management coordination efforts and role as the RTPA, the CCOG coordinated with local non-profit agencies to facilitate FTA Section 5310 grant applications to support mobility management and coordinated transportation activities. The effort was successful and the CCOG has continued to work with the SSTAC to establish mobility management as a priority and identify processes in the Coordinated Plan. In addition, staff furthered the development of the online CIP database.

**Recommendations**

Three recommendations are provided to improve the CCOG’s administration and management of the TDA and its organization as summarized below:

<b>Performance Audit Recommendation</b>	<b>Background</b>
#1. Conduct strategic planning and goal setting exercises involving the Board and executive director, given the added oversight and administration of the CTA.	The audit period saw a turnover of personnel at the COG as well as the formation of the CTA, which is administered and staffed by the COG. The executive director was appointed to the position at the beginning of the period. Board members interviewed for this performance audit have spoken highly of the administrative capabilities of the executive director and the COG staff. After having successfully integrated new staff and overseen the formation and administration of the CTA and planning studies, it is suggested that the COG move forward on strategic planning and goal setting involving the executive director and the Board. Given the mandates for zero emission vehicle technologies and the delivery of critical corridor improvements, a strategic planning process would help to clarify the mission and priorities of the COG internally as well as further its role as a regional advocate.
#2. Document separation of staff roles in TDA administration for claiming funds for the CTA and approving the claim.	The <i>CCOG Policies and Procedures Manual</i> contains an overview of personnel staffing classifications and duties. In addition, under the Funding Mechanisms and Application/Claim Process section of the manual, there is a brief overview of the CCOG’s role in the administration and allocation of the TDA in Calaveras County. During the audit interview process, it was disclosed that the administrative services officer prepares the TDA claim forms, which are reviewed by the executive director and the Technical

Performance Audit Recommendation	Background
	<p>Advisory Committee. The CCOG Board then approves the claim. It is suggested that these roles be memorialized in the <i>Policies and Procedures Manual</i> for clarification, transparency, and direction.</p>
<p>#3. Update the CCOG TDA Claims Checklist and consider the implementation of an electronic claims form.</p>	<p>The CCOG <i>Transportation Development Act Guidebook</i> (TDA Guidebook) was last updated in June 2016. Since that time, there have been several amendments to the TDA statute as well as a restructuring of the transit claimant relationship with the formation of the CTA. For example, AB 1113 changed the filing timeline for the transit operator financial transactions report to the State Controller from 90 days to seven months and using audited data. While the CCOG and CTA are compliant with this particular change, the standard assurances in the claim continue to show the 90-day report. The TDA Guidebook also does not show this updated change in the submittal date. Further, the timeliness of the calculation of the State Transit Assistance eligibility criteria should accompany the claim timelines to enable the CTA to determine and budget whether any of these funds will be claimed for operations rather than capital. Another update for consideration would be the implementation of an electronic claims form in Excel or a fillable PDF format. This would accommodate quick modifications as necessary to the claims form format and instructions based on changes to TDA policy.</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) 2017–18 through 2019–20. As a Regional Transportation Planning Agency (RTPA), the 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 the CCOG is meeting its administrative and planning obligations under the TDA.

#### Overview of CCOG and Calaveras County

The 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 the 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. The 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	2019 ACS 5-Year Estimates	Change from 2010 US Census	% Population 65 Years & Older 2019 ACS	2021 Department of Finance Estimates	Land Area (in square miles)
Angels Camp (City of Angels)	3,875	+1.0%	31.4%	4,038	3.63
Unincorporated Area	41,639	-0.2%	27.1%	40,998	1,016.38
Total Calaveras County	45,514	-0.1%	27.5%	45,036	1,020.01

*2010 US Census; 2019 American Community Survey 5-Year Estimates & California Department of Finance, 2021 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 7,026 based on the 2019 American Community Survey 5-Year Estimates. The county’s senior citizen population, composed of residents aged 65 and over, is 27.5 percent. The 2021 population for Calaveras County is estimated to be 45,036 as reported by the California Department of Finance, a slight decline from the 2019 American Community Survey 5-Year Estimates.

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

Organizational Structure

Seven members comprise the 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 three 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**

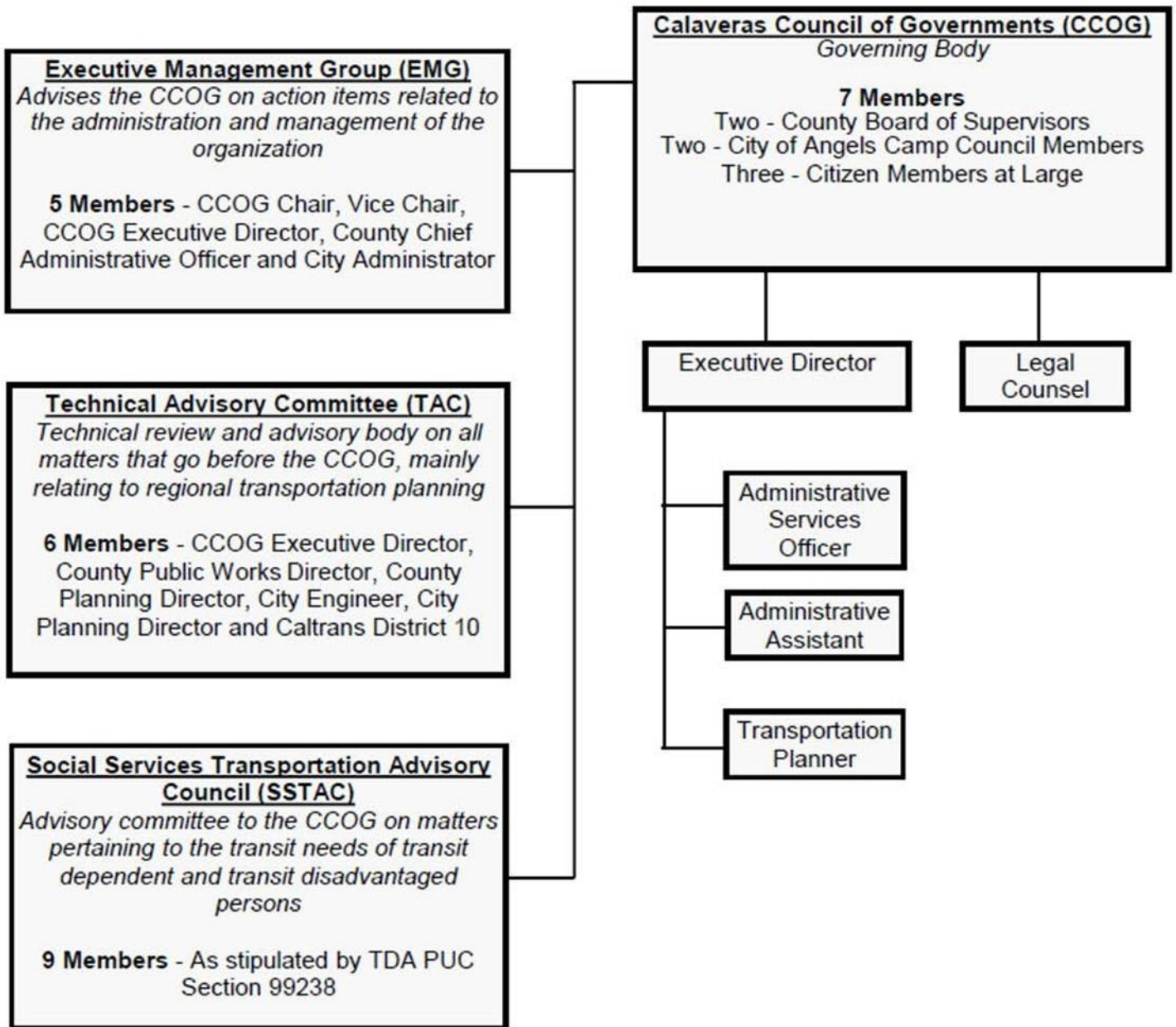
<b>Committee</b>	<b>Purpose and Function</b>
<b>Technical Advisory Committee (TAC)</b>	As the clearinghouse and technical review body for the CCOG, this committee discusses issues of regional significance, reviews upcoming agenda items, and makes recommendations to the CCOG Board. The TAC meets on the 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.
<b>Social Services Transportation Advisory Council (SSTAC)</b>	The SSTAC serves in an advisory role in conjunction with the annual unmet transit needs process as well as to advise the 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

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

Committee	Purpose and Function
	<p>executive director, County 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"><li>• Serves as a review panel for all personnel and policy matters and makes recommendations to the CCOG Board.</li><li>• Conducts an annual review of the CCOG executive director and makes recommendations to the CCOG Board.</li><li>• Carries out any special duties as may be assigned by the CCOG Board.</li><li>• Reviews the findings and makes recommendations to the CCOG Board on the triennial classification, compensation, and utilization study.</li></ul>

Figure I-1  
CCOG Organization Chart

**CALAVERAS COUNCIL OF GOVERNMENTS**  
**ORGANIZATIONAL CHART**



Following the audit period, the CCOG filled the transportation planner position that had been contracted to on-call consultants.

The CCOG’s audited annual revenue, as measured by all program revenue for each fiscal year, ranged from \$886,829 in FY 2018 to \$1,214,754 in FY 2019 to \$941,448 in FY 2020.<sup>1</sup> The higher revenues in FY 2019 were attributed to the receipt of three Caltrans reimbursement grants.

The 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 \$967,241 in FY 2018 to \$1,111,896 in FY 2019 to \$1,359,538 in FY 2020.<sup>2</sup> The annual increase and fluctuations was primarily due to the amount of professional services utilized for Overall Work Program projects.

### 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 the 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 the CCOG’s responses to the recommendations provided in the previous performance audit. In Section IV, Michael Baker provides a detailed review of the CCOG’s functions. The last section summarizes our findings and recommendations.

---

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

<sup>2</sup> CCOG Annual Financial Report.

## 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 the CCOG’s conformance with the TDA. Our findings concerning the 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	The 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 CTA are conditioned on meeting CCOG terms and conditions outlined in the resolution.  <b>Conclusion: Complied</b>
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	The CCOG includes instructions in its TDA Guidebook for the submission of claims for pedestrian and bicycle projects. The CCOG allocates 2 percent 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

TABLE II-1 CCOG Compliance Requirements Matrix		
CCOG Compliance Requirements	Reference	Compliance Efforts
		<p>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.</p> <p><b>Conclusion: Complied</b></p>
<p>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.</p>	<p>Public Utilities Code, Sections 99238 and 99238.5</p>	<p>The 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.</p> <p><b>Conclusion: Complied</b></p>
<p>The RTPA has annually identified, analyzed, and recommended potential productivity improvements which could lower the operating costs of those operators which operate at 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>	<p>Public Utilities Code, Section 99244</p>	<p>The CTA assumed full responsibility for administration of the public transit system from County management on July 1, 2018. The governing board of the CTA is the same as that of CCOG. Prior to the formation of the CTA, operational issues were discussed by the Interagency Transit Committee (ITC). The ITC worked to coordinate services, discuss regional transit issues, and exchange ideas to</p>



TABLE II-1 CCOG Compliance Requirements Matrix		
CCOG Compliance Requirements	Reference	Compliance Efforts
<ul style="list-style-type: none"> <li>A committee for the purpose of providing advice on productivity improvements may be formed.</li> <li>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.</li> </ul>		<p>enable the transit system to operate more efficiently. The functions of the ITC have been moved to the SSTAC.</p> <p>The 2017 Calaveras Transit Service Plan was adopted by the Calaveras County Board of Supervisors in January 2017. The routes were rebranded to color designations and realigned with better connectivity. In addition to the CTA, the CCOG uses the SSTAC to analyze transit needs and suggest improvements.</p> <p>Other methods for identifying productivity improvements include monitoring the implementation status of prior performance audit recommendations and the annual unmet transit needs process moderated by the CCOG. As part of the annual unmet transit needs process, the CCOG prepares a detailed report documenting the conditions of the transit system and service area and public testimony of any potential unmet needs.</p> <p>Further, transit planning projects, including an update to the SRTP, were initiated in May 2019 along with the Coordinated Public Transit-Human Services Transportation</p>

TABLE II-1 CCOG Compliance Requirements Matrix		
CCOG Compliance Requirements	Reference	Compliance Efforts
		<p>Plan (Coordinated Plan) update. The CCOG partnered with the Tuolumne County Transportation Council on both efforts. A final full report of the Calaveras Connect SRTP 2020-2025 was released in January 2021.</p> <p><b>Conclusion: Complied</b></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 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>Public Utilities Code, Section 99245</p>	<p>The CCOG selects one certified public accountant to conduct all TDA claimants’ fiscal and compliance audits. Richardson &amp; Company, LLP is retained to complete the fiscal audits. The TDA fiscal audits were completed by the timelines set by the State Controller or were granted the appropriate extension as follows:</p> <p>FY 2018: January 15, 2019                      FY 2019: November 27, 2019                      FY 2020: November 19, 2020</p> <p><b>Conclusion: Complied</b></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</p>	<p>Public Utilities Code, Sections 99246 and 99248</p>	<p>For the current three-year audit, the CCOG retained Michael Baker International to conduct the performance audit of the CCOG and the transit operator.</p> <p>Michael Baker was retained to conduct the performance audits for the previous triennial period.</p>

TABLE II-1 CCOG Compliance Requirements Matrix		
CCOG Compliance Requirements	Reference	Compliance Efforts
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.		<b>Conclusion: Complied</b>
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 13, 2018.  <b>Conclusion: Complied</b>
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	Public Utilities Code, Section 99346(d)	The performance audit of the CTA includes all required TDA performance measures plus additional indicators where warranted to further assess the operator’s efficiency, effectiveness, and economy with the use of TDA funds.  <b>Conclusion: Complied</b>

TABLE II-1 CCOG Compliance Requirements Matrix		
CCOG Compliance Requirements	Reference	Compliance Efforts
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) 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.  <b>Conclusion: Not Applicable</b>
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. The CCOG made an effort in identifying and designating a consolidated transportation service agency (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.  The CCOG's TDA Manual

TABLE II-1 CCOG Compliance Requirements Matrix		
CCOG Compliance Requirements	Reference	Compliance Efforts
		<p>includes criteria for the selection and designation of an agency as a CTSA, and terms and conditions in a resolution designating a CTSA. One of these terms is the claim amount in which the CCOG shall provide guidance on an acceptable LTF claim amount to be available to the CTSA; the CCOG may limit the amount of an Article 4.5 claim according to criteria which it establishes. Once a CTSA is designated, the CCOG will then establish criteria, rules and regulations for evaluation of the claim.</p> <p><b>Conclusion: Not Applicable</b></p>
<p>State transit assistance funds received by the RTPA are allocated only for transportation planning and mass transportation purposes.</p>	<p>Public Utilities Code, Sections 99310.5 and 99313.3, and Proposition 116</p>	<p>The CCOG allocates State Transit Assistance (STA) funds for transit operating, administrative, capital, and planning expenditures only.</p> <p><b>Conclusion: Complied</b></p>
<p>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.</p>	<p>Public Utilities Code, Section 99314.3</p>	<p>The CCOG administers STA funds in accordance with the relevant PUC requirements (i.e., on the basis of population). The CTA is required to file an annual transportation claim for STA funds as apportioned by the CCOG based on estimated revenues. Similar to LTF claims, STA is approved with terms and conditions for the CTA.</p>

TABLE II-1 CCOG Compliance Requirements Matrix		
CCOG Compliance Requirements	Reference	Compliance Efforts
		<b>Conclusion: Complied</b>
<p>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:</p> <ul style="list-style-type: none"> <li>• Consulted with the Social Services Transportation Advisory Council (SSTAC) established pursuant to Public Utilities Code, Section 99238;</li> <li>• Identified transit needs, including: <ul style="list-style-type: none"> <li>○ Groups that are transit-dependent or transit-disadvantaged,</li> <li>○ Adequacy of existing transit services to meet the needs of groups identified, and</li> <li>○ Analysis of potential alternatives to provide transportation services;</li> </ul> </li> <li>• Adopted or re-affirmed definitions of “unmet transit needs” and “reasonable to meet”;</li> </ul>	<p>Public Utilities Code, Section 99401.5</p>	<p>LTF funds have only been allocated to streets and roads after completion of the unmet needs process. The CCOG conducts the unmet needs hearings in consultation with the SSTAC.</p> <p>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.</p> <p><b>Conclusion: Complied</b></p>

TABLE II-1 CCOG Compliance Requirements Matrix		
CCOG Compliance Requirements	Reference	Compliance Efforts
<ul style="list-style-type: none"> <li>Identified the unmet transit needs or there are no unmet transit needs, or that there are unmet transit needs that are reasonable to meet.</li> </ul> <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 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</p>	<p>California Administrative Code, Section 6662</p>	<p>The accounting firm of Richardson &amp; Company, LLC conducted the annual financial audit of the CCOG during the triennial performance audit period. 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 2018: November 27, 2018  FY 2019: November 27, 2019  FY 2020: November 19, 2020</p> <p>The CCOG also maintains fiscal and accounting records and supporting papers for at least</p>

TABLE II-1 CCOG Compliance Requirements Matrix		
CCOG Compliance Requirements	Reference	Compliance Efforts
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.		four years following the fiscal year close.  <b>Conclusion: Complied</b>

**Findings and Observations from RTPA Compliance Requirements Matrix**

The 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.

The CCOG was instrumental in the formation of the CTA. The CTA was created under a JPA executed between the County of Calaveras and City of Angels. The final adopted JPA was signed on March 6, 2018 and implemented on July 1, 2018. The governing board of the CTA is the same as the governing board of the CCOG. The executive director of the CCOG also serves as the executive director of the CTA. A Professional Services Agreement (PSA) was executed between the CTA and the CCOG on April 1, 2018 for staffing services.

Since the CTA assumed administrative oversight of the County’s transit system, TDA claim procedures and reporting protocols have been in conformance with the CCOG TDA Policies and Procedures and TDA statute. The CTA is staffed by the CCOG, which is tasked with the annual allocation of TDA funding and processing of claims. Therefore, the TDA claim form for transit services is prepared internally with distinct roles assigned to staff. To its credit, the 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 the CCOG’s responses 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

Continue to partner and identify mobility management strategies.

*Background:* The CCOG, in implementing a prior recommendation regarding actions taken to promote mobility management, has worked with a local nonprofit 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 partnership opportunities 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. The CCOG should continue partnering and working to identify strategies that address a full range of well-synchronized mobility services within the County.

#### Actions taken by CCOG

The COG took several steps in partnering with local nonprofit organizations and identifying mobility management strategies. The COG assisted Common Ground’s Silver Streak in applying for FTA Section 5310 grant funding to support a mobility management position. The grant pursuit was successful and the CCOG has continued to work with the SSTAC to establish priorities and identify a process in the Coordinated Plan. This process has included mobility management updates from Common Ground and support for efforts to centralize mobility information. However, a recent lack of coordination with the mobility manager at Common Ground has increased the need for the CCOG and CTA to manage the centralized program of networking and a database of providers. CCOG continues to work with other non-profit organizations, like Area 12 Agency on Aging, to coordinate transportation services and information.

#### Conclusion

This recommendation has been implemented.

Prior Recommendation 2

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

*Background:* It was noted in the prior audit that the CCOG had continued to hold the County accountable for compliance with its TDA claim submittal. The CCOG requires that TDA claims be certified by the County Auditor-Controller pursuant to California Code of Regulations Section 6632. All modifications to the budget or claims must be submitted to allow adequate review time by the TAC. Nevertheless, there were ongoing challenges with the accuracy and timeliness of the County's claim. The 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 had not been diligent in reporting data to the CCOG, in particular to the ITC, or to the County Board of Supervisors. Although the contract operator for the transit system routinely prepared monthly reports, including ridership statistics for each run and stop, County staff did not routinely analyze and report the data to the CCOG or County Board of Supervisors. It was anticipated that with the formation of the JPA to administer the transit system, TDA compliance would improve regarding consistent performance monitoring and claim procedures. It was also recommended that further accountability be attained through the regular reporting and analysis of transit performance data to the ITC.

Actions taken by CCOG

Accountability toward compliance with the provision of the TDA has been greatly enhanced with the formation of the CTA. The CCOG worked with the County and City to establish this new transit organizational structure and management practices. Since the CTA assumed administrative oversight of the County's transit system, TDA claim procedures and reporting protocols have been in conformance with the CCOG TDA Policies and Procedures and TDA statute. The CTA staff is composed of CCOG staff, which is tasked with the annual allocation of TDA funding and processing of claims. Therefore, the TDA claim form for transit services is prepared internally. In addition, the functions of the ITC have since been transferred to the SSTAC.

Conclusion

This recommendation has been implemented.

Prior Recommendation 3

Consider the appointment of a student representative on the SSTAC.

*Background:* The CCOG upholds the composition of the SSTAC as representative of the categories pursuant to PUC Section 99238 of the TDA. Given the rural profile of Calaveras County and the transit service area, the 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. The TDA allows discretion for the CCOG to appoint other representatives above those required by statute, including those of limited means. The 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 SSTACs in an effort to engage this large ridership group.

#### Actions taken by CCOG

The SSTAC has approved the addition of a student representative on the advisory council listed under Category 8 on the SSTAC roster and application. The position remains open and the COG is currently recruiting for that open position. It is suggested that the COG coordinate its recruitment efforts with local high schools and Columbia College.

#### Conclusion

This recommendation has been partially implemented.

#### Prior Recommendation 4

Update the new appointee orientation for the SSTAC.

*Background:* During interviews with SSTAC members as part of the prior audit process, it was indicated that new appointees receive a handbook to review; however, an orientation to review the handbook with COG staff 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 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, the 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 and receive 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, an annual Funding 101 workshop could be held during one of the committee meetings so that all members are up to speed on COG responsibilities.

Actions taken by CCOG

The SSTAC orientation binder is updated for new appointees and offered to new SSTAC members. In addition, new SSTAC members go through an orientation process with the CCOG's executive director.

Conclusion

This recommendation has been implemented.

Prior Recommendation 5

Implement "timely use of funds" guidelines and enforcement.

*Background:* An issue the 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 Assembly Bill (AB) 1012. AB 1012 (Chapter 783 of the Statutes of 1999) was enacted with a goal of improving the delivery of transportation projects. Funding sources such as the Congestion Mitigation and Air Quality Improvement (CMAQ) program and Regional Surface Transportation Program (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 the 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. The CCOG should implement the timely use of funds guidelines and enforcement of funding timelines.

Actions taken by CCOG

Timely use of funds guidelines has been adopted and implemented. As part of the COG's FY 2019-20 Federal RSTP and HIP Call for Projects guidelines, the Timely Use of Funds policy was included. The intent of the Timely Use of Funds policy is to ensure sponsoring agencies do not lose any funds due to missing a federal or state funding deadline. The policy also is intended to ensure that Calaveras County residents benefit from an improved transportation system through the expeditious application of the scarce transportation resources available to this region.

Conclusion

This recommendation has been implemented.

Prior Recommendation 6

Develop format and content for an annual CCOG report.

*Background:* Despite its limited staffing resources, the 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 the 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 educating the public and stakeholders on the 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 the CCOG and should be explored further.

Actions taken by CCOG

The COG’s executive director provides monthly reports to the Council on all CCOG business and progress of projects. Given the focus on the formation and development of the CTA and limited staffing resources, the COG has not been able to focus on development of an annual report.

Conclusion

This recommendation has not been implemented due to prioritization of the CTA and limited staffing resources; however, alternative approaches have been implemented to accomplish similar outcomes.

## Section IV

### Detailed Review of RTPA Functions

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

- Administration and Management
- Transportation Planning, Programming, and Regional 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 the CCOG's functions, which include general administration, internal planning and achievements, the Overall Work Program (OWP), personnel management, and interviews with Board and SSTAC members.

#### General Administration

The purpose of the 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. The CCOG mission statement expounds upon its purpose:

*The Calaveras Council of Governments 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 the CCOG experienced some changes involving the departure of the executive director and the administrative assistant. The executive director separated from the 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 the CCOG in an administrative and financial services capacity. The administrative services officer, who had been with the CCOG since 2010, served as interim executive director until the position was filled.

The COG advertised for recruitment of the executive director position in May 2017 on the COG website and Facebook page, as well as other industry publications. The recruitment committee screened candidates and recommended the top candidates for full review. The transportation planner, who has been with the CCOG since 2012, was selected for the executive director's position and appointed by the Board at its July 24, 2017 Board meeting.

The administrative services officer separated from the COG in January 2020. The current administrative services officer joined the COG in February 2020, having previously been employed by the Calaveras County Auditor-Controller. The administrative assistant has been with the COG for four years.

With the transportation planner's appointment to executive director, the CCOG sought to fill the transportation planner duties by contracting out certain planning and programming tasks. The CCOG released a Request for Qualifications (RFQ) on August 30, 2017, for consulting firms to provide consulting services on an on-call basis for 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.

The transportation planner position was filled in August 2019 and briefly held until October 2019. The position was vacant until it was filled with the current direct hire in January 2021.

### *Internal Planning and Achievements*

The 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 2017-18 to 2019-20, the CCOG accomplished a number of achievements on various projects and studies. Highlights of some of these projects are described below:

*Calaveras Transit Agency Formation:* The CTA was formed under a JPA between the City of Angels Camp and the County of Calaveras on March 6, 2018. The CTA assumed full

responsibility for administration of the public transit system from County management on July 1, 2018. The CTA Board approved the rebranding of the transit system at its December 2018 meeting, which was rolled out in May 2019 as Calaveras Connect.

*2017 and 2021 Regional Transportation Plan Updates:* Updates to the Regional Transportation Plan (RTP) occurred in the Fall of 2017 and 2021. The RTP updates have a financially constrained plan that identifies funding from federal, state, and local sources. The RTPs also cite state greenhouse gas emissions reduction mandates and emphasize improvements in air quality and public health outcomes. The projects outlined in the action element are consistent with the Federal Transportation Improvement Program and the State 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:* The CCOG commissioned an update to the Calaveras County SRTP, which was finalized in January 2021. The prior SRTP was adopted in 2016. The aim of updating the SRTP was to evaluate services currently provided by Calaveras Connect and develop a plan to improve system performance and provision over a five-year horizon.

*Calaveras County Coordinated Public Transit-Human Services Transportation Plan 2020-2024:* Developed in concert with the SRTP to combine data collection efforts and carry forward the strategies or programs identified, the Coordinated Plan's purpose is to identify mobility needs and gaps of key target market groups. CCOG partnered with the neighboring counties, Amador County Transportation Commission (ACTC) and Tuolumne County Transportation Council (TCTC) to apply for and receive grant funding to complete updates to each regions' Coordinated Plans. The grant was awarded to TCTC, as project lead, and ACTC and CCOG as sub-applicants.

*SR 4 Wagon Trail Realignment Project:* The CCOG expedited the project delivery involving the realignment of a section of SR 4 between Copperopolis and Angels Camp. The funding strategy for delivering the project was to focus on advancing the western segment from Bonanza Mine Way to Appaloosa Road to "shovel ready" status with the goal of attracting state and federal funding. The COG was successful in keeping the project programmed in the State Transportation Improvement Program (STIP) and guiding it through the project approval and environmental documentation phase. Approximately \$5.3 million in STIP funding from prior cycles has been used to complete environmental studies, acquire rights of way, and prepare plans, specifications, and estimates (PS&E) for the entire western segment. The COG worked closely with Caltrans District 10 on a pilot grant through its Asset Management program to receive \$10.325 million for construction.

*Adoption of Programming Documents:* The CCOG adopted programming documents such as the Regional Transportation Improvement Program (RTIP) on scheduled intervals to ensure the continued flow of transportation revenue. CCOG has also released periodic Call for Projects to select, prioritize, and program City and County capital improvement



projects for state and federal funds. CCOG programs federal, state, and regional transportation funds for several modes of transportation.

*Grant Funding:* The CCOG has been successful in obtaining grant funding over the audit period including several Caltrans planning grants, as well as through partnerships with other regions such as the Zero Emissions Vehicle Readiness Plan with the Tuolumne County Transportation Council. CCOG has also supported several successful grant applications for City and County infrastructure improvement projects including Active Transportation Program (ATP) and Highway Safety Improvement Program (HSIP) grants.

*Active Transportation:* The CCOG continued to administer the Regional Bicycle, Pedestrian, and Safe Routes to School Master Plan, including the [walkandbikecalaveras.org](http://walkandbikecalaveras.org) website. COG staff partnered with four neighboring regions to develop the Bicycle, Tourism and Economic Development Study, which engaged local stakeholders such as the Murphys Bike Advocacy Group and the Mother Lode Bike Coalition. Stakeholder outreach was done in conjunction with the California Bicycle Coalition.

After having successfully integrated new staff, updated the Policies and Procedures Manual, and overseen the formation and administration of the CTA and planning studies, the stage is set for the COG move forward on strategic planning and goal setting involving the executive director and the Board. Given the mandates for zero emission vehicle technologies and the delivery of critical corridor improvements, a strategic planning process would help to clarify the mission and priorities of the COG internally as well as further its role as a regional advocate.

#### Overall Work Program & Allocation Plan

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

The OWP serves as the CCOG's annual budget and program guide, which is adhered to closely. The introductory chapter discusses the core functions of the 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, a matrix of funding sources and agency participation. There were 20 work elements in the FY 2017-18 OWP; 19 work elements in the FY 2018-19 OWP; and 21 work elements in the FY 2019-20 OWP. A work program schedule is found toward the end of the OWP, listing the start and end dates for each element. The approximate number of staff hours for each element is 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 nonmotorized users.
3. Increase the security of the transportation system for nonmotorized 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 spring, 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 taken to the CCOG Board in March. The final draft is submitted to Caltrans in June.

The OWP is consistent with the *2017 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 the 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. The 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 pay periods. The administrative services officer maintains all recruitment files and conducts an orientation meeting with all new employees.

The *CCOG Policies and Procedures Manual* includes sections on job classifications and duties, employment policy, compensation/work schedules, employee benefits, employee expenses, and miscellaneous office policies. The manual underwent two amendments during the audit period (September 2018 and June 2019) as well as a subsequent amendment in October 2020.

The CCOG provides health, dental, vision, and optical insurance plans. The 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.

The 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 participate in the 2% at 62 risk pool.

The 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, 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 the CCOG’s operations and coordination of transit issues. The three 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 functionality. A general summary of the Board member responses is shown below:

- The length of service of the Board members interviewed ranges from 2.5 to 13 years.
- The CCOG has developed a more collaborative relationship with the County, City of Angels, and Caltrans. The COG has proven to be adept in facilitating the delivery of projects.
- Under the leadership of the executive director, staff has performed in a professional and enthusiastic manner in the executive of their duties. Staff will follow up on inquiries and requests in a prompt manner. Staff has performed well in their areas of expertise.
- Recent changes in the direction of COG policies and administration have resulted in greater financial accountability and consistency.
- CCOG staff has been adept in leveraging financial resources to ensure that projects receive funding. Funding for the SR-4/Wagon Trail project was successfully procured.
- The CCOG engages the Board in goal setting on an annual basis and has been following through on meeting these goals. Board members cited the emphasis on transit and the delivery of the SR-4/Wagon Trail project.
- 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. Agendas are distributed one week before the scheduled meetings and

the executive director will brief Board members the day before the meetings. Board meetings are well run and productive.

- The Board has adapted well during the COVID-19 pandemic with videoconferencing. Staff was able to accommodate the needs of a hearing-impaired Board member.
- One Board member expressed concern about meeting the zero-emission/electric transit vehicle mandates for the CTA.
- Board members expressed overall satisfaction with the direction of the COG. The quality of the staff and Board composition has been the best in years.

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

- The length of service of SSTAC members interviewed ranges from 8 months to more than 10 years. Two of the three members interviewed were recent appointees.
- Most SSTAC members queried acknowledged receiving an information binder on the roles and responsibilities of the SSTAC and the COG. Due to the COVID-19 pandemic, a virtual orientation was offered. Agendas and minutes from past meetings were provided as a reference.
- CCOG staff members conduct themselves very professionally and are knowledgeable, detail oriented, and well organized in the execution of duties. Staff is very attentive and responsive.
- The process is fair and balanced with staff proactively soliciting feedback from members. There is very good follow-through in response to inquiries. Open and receptive to outside suggestions.
- The CCOG employs a very practical approach to issues and reflects the environment it serves.
- The 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. Stakeholder engagement included an online survey and social media outreach. Transportation needs are addressed and being met.

- Efforts have been made to improve interline connectivity to Amador County.
- 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. CARES Act funding considerations were brought up during the meetings.
- The CCOG has generated great momentum. Staff has proven adaptive and resilient during the COVID-19 pandemic.
- The CCOG should continue efforts to recruit new members and even consider expanding the membership categories. Look to the Amador County SSTAC composition for guidance.

## **Transportation Planning, Programming, and Regional Coordination**

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

### Regional Transportation Plan

The RTP is the 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 multimodal 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.

The COG uses the RTP as an interactive tool and guide in its engagement with the Board, as well as to develop goals and policies for infrastructure improvements. Calls for projects for grant solicitations are based on the goals of the RTP.

At the beginning of the audit period, the CCOG completed 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 incorporated recent state legislation, strengthening the connection between land use, transportation, and greenhouse gas emissions. Under Senate Bill 743, the California Environmental Quality Act (CEQA) was amended to provide an alternative to level of service 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 level of service to vehicle miles traveled.

As previously mentioned, the CCOG initiated an update to the RTP during the audit period. The 2021 RTP update includes a 20-year vision of policies and regionally significant improvements. The goals established for the 2021 RTP address safety, the environment, equity, and climate change. The RTP is composed of an executive summary and seven chapters: introduction, existing conditions, planning documents overview, modal discussion, policy element, action element, and financial element. The financially constrained financial plan contains funding from federal, state, and local sources. The first five years of RTP projects are fiscally constrained. However, for the mid-term and long-term periods, there is a significant shortfall in recurring revenues, roughly \$52 million in regional roadway projects. The COVID-19 pandemic affected the public engagement process in 2020. In adapting to a virtual meeting environment, the CCOG employed virtual outreach tools and platforms. Low-income and underserved communities were engaged with targeted outreach. A dedicated website was created for the RTP update (<http://calaverasrtp.com/>). The draft 2021 RTP was released in August 2021.

### *Regional Transportation Improvement Program*

The RTIP is a document used by regional agencies throughout California to nominate transportation projects for funding under the STIP. The document reflects changes introduced by Senate Bill 45, which made significant modifications to the funding, programming, and planning of transportation improvement projects, and further consolidated state funding into two comprehensive programs: the Regional Improvement Program, and the Interregional Improvement Program. The CCOG is responsible for recommending projects that will be funded with a statutory formula share of the Regional Improvement Program through its submittal of the RTIP.

The Calaveras County RTIP is generally developed in coordination with neighboring Alpine and Amador Counties pursuant to a 1997 Memorandum of Understanding. The CCOG worked jointly with those neighboring counties as part of the Tri-Counties partnership for the 2014 RTIP cycle. During the audit period, in December 2018, the CCOG submitted the

2018 Calaveras County RTIP, which has a five-year programming horizon covering FY 2018-19 through FY 2022-23, to the state as part of the 2018 STIP process.

In January 2016, Caltrans District 10 secured a State Highway Operations and Protection Program Pilot Program award in the amount of \$10.32 million. As a result, the 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 2018 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 project.

Subsequently, the CCOG submitted the 2020 Calaveras County RTIP. At its December 2020 Board meeting, the COG approved the RTIP. As with the 2018 RTIP, the COG requested that \$4.427 million in prior cycle STIP funding for the SR 4 Wagon Trail construction be programmed for FY 2020-21. The net amount of \$1.265 million would remain unprogrammed as a contingency for the construction phase of the western segment of the SR 4 Wagon Trail project in FY 2020-21.

For the 2018 and 2020 RTIPs, the COG's strategy for the SR 4 Wagon Trail realignment project has been to advance the entire western segment of the project to shovel-ready status with the intent of constructing the Pool Station Road to Appaloosa Road sub-segment in FY 2020-21, in partnership with Caltrans District 10.

The prior audit addressed the issue the CCOG has had with administering funds for City and County projects, namely, project delivery and timely use of funds. It was recommended that the COG implement the timely use of funds guidelines developed by Caltrans and enforcement of funding timelines. The timely use of funds guidelines has been adopted and implemented. As part of the COG's FY 2019-20 federal RSTP and Highway Infrastructure Program Call for Projects guidelines, the Timely Use of Funds policy was included. The intent of the Timely Use of Funds policy is to ensure sponsoring agencies do not lose any funds due to missing a federal or state funding deadline.

*Transit Planning including Performance Monitoring and the Transit Development Planning Process*

Transit planning and performance monitoring have greatly improved since the formation of the CTA. The County of Calaveras administration was supportive of the JPA. The City of Angels Camp saw the benefit of the JPA and has more of a stake in the transit system. The CTA has fostered a closer working relationship with the Calaveras Connect contractor operator. The CTA schedules monthly meetings with the contractor with an agenda.



The Calaveras Transit Service Plan, adopted by County Board of Supervisors in January 2017, recommended a series of improvements to provide an efficient system of convenient bus routes and schedules designed to maximize ridership and passenger convenience. While the recommendations were implemented including rebranding of the routes from a numbered to a color designation and modifications of the Saturday Hopper schedule, the Delta Gold Line service was encountering ridership issues and its schedule was modified to facilitate better connections in the county. However, in spite of the modifications, the Delta Gold Line service was discontinued in July 2017 at the beginning of this audit period.

In May 2019, an update to the SRTP was initiated in concert with the Coordinated Plan update. The CCOG partnered with the Tuolumne County Transportation Council on both efforts. The Council administered the consultant contract on behalf of both agencies and awarded a contract to AMMA Transit Planning, which subcontracted the SRTP development to Mobility Planners. The 2021 SRTP update was finalized in January 2021.

The SRTP update has a five-year planning horizon from FY 2020-21 to FY 2024-25 and is the first SRTP commissioned since the formation of the CTA and the rebranding of the transit service to Calaveras Connect. The recommended service plan includes a mix of fixed route and general public dial-a-ride service operated five days a week within Calaveras County and two-day-a-week Direct Connect service to destinations outside Calaveras County. In addition, the SRTP includes an update on zero-emission vehicle requirements. Much of the work for the SRTP was completed prior to the COVID-19 pandemic and the shelter-in-place order. This includes the public outreach and service assessment tasks.

Prior to the formation of the CTA, the CCOG provided a platform and forum for transit service planning and performance issues through the ITC, which was composed of transit managers and administrators. The City of Angels Camp was represented by its planning director. The functions of the ITC have since been transferred to the SSTAC. Further oversight of the transit system is provided through the CTA.

#### *Calaveras Transit Agency Formation*

The 2016 SRTP included an extensive study and analysis of organizational structures and management options. The SRTP included recommendations to pursue an alternative organizational structure. The most cost-effective recommendation was a JPA with consolidation of CCOG staff. The process of forming a JPA was based on these recommendations. 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 OWP Amendment No. 1 for consultant services to assist in facilitating and guiding the process.

The City and County liaisons, along with staff from the CCOG and the County Public Works Department, met on September 21, 2017, 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 JPA, as recommended by the SRTP. The 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 in October 2017. There was consensus and support to recommend the contract award to the sole bidder. The consultant worked 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 JPA was approved by the Calaveras County Board of Supervisors on February 13, 2018. The agreement was subsequently approved by the City of Angels Council on February 20, 2018. The final adopted JPA was signed on March 6, 2018 and implemented on July 1, 2018.

The governing board of the CTA is the same as the governing board of the CCOG. The positions of chair and vice chair are same as for the CCOG board. The executive director of the CCOG also serves as the executive director of the CTA. A professional services agreement (PSA) was executed between the CTA and the CCOG on April 1, 2018 for staffing services. Execution of the PSA was necessary to define the relationship of staffing between the two agencies.

#### *Active Transportation Program*

The Active Transportation Program (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 was supplemented in 2017 with the passage of Senate Bill 1, which infused additional funding into the program, nearly doubling the amount of funds available. The ATP is administered by the California Transportation Commission. 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 nonmotorized 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, the CCOG embarked on the development of its own ATP with the creation of a volunteer position at CCOG as well as creating a website called Walk-Bike Calaveras (<http://www.walkandbikecalaveras.org/>). Walk-Bike Calaveras is a 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, the CCOG is responsible for the administration of the TDA program. This functional area addresses the 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
- 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 for the City and County, the 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 2018 through 2020, 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 *
2018	\$369,511
2019	\$272,114
2020	\$297,908

Source: STA and LTF audited financial statements for CCOG

\* 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.

Technical and Managerial Assistance to Operators

The CCOG provides technical assistance to claimants. One of the tools utilized is the CCOG *Transportation Development Act Guidebook* (TDA Guidebook). The TDA 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.

Since CCOG staff serve in the role of CTA staff, claims are processed in-house. Prior to the formation of the CTA, CCOG staff provided remedial assistance to the County regarding the claim submittal process. The CCOG had been receiving inaccurate and incomplete claim information from the County, which previously administered the transit system. This prompted the CCOG to approve conditional LTF allocations and reduced funding using annualized actuals.

TDA Claim Processing

On an annual basis during this audit period, the CCOG was responsible for managing the apportionment of between \$1.05 million and \$1.18 million in LTF revenues and between \$290,000 and \$384,000 in STA funds. During the audit fiscal years of 2018 through 2020, 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
2018	\$1,048,214	\$290,662	\$1,338,876
2019	\$1,082,990	\$383,714	\$1,466,704

Fiscal Year	Local Transportation Fund	State Transit Assistance	Total
2020	\$1,177,231	\$383,538	\$1,560,769

Source: STA and LTF audited financial statements for CCOG

The 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. Apportionment by population does not occur until after the CTA receives its allocation for the transit system.

The 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. The 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, the CCOG could also authorize payments in arrears based on actual expenses. The 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.

The CCOG TDA Guidebook was last updated in June 2016. Since that time, there have been several amendments to the TDA statute as well as a restructuring of the transit claimant relationship with the formation of the CTA. For example, AB 1113 changed the filing timeline for the transit operator financial transactions report to the State Controller from 90 days to seven months and using audited data. While the CCOG and the CTA are compliant with this particular change, the standard assurances in the claim continue to show the 90-day report. The TDA Guidebook also does not show this updated change in the submittal date. Also, the timeliness of the calculation of the STA eligibility criteria should accompany the claim timelines to enable the CTA to determine and budget whether any of these funds will be claimed for operations rather than capital. Other more recent state legislative changes to TDA and farebox recovery relief were made in the past year with passage of AB 90 and AB 149. CCOG staff has indicated a willingness to implement an electronic claims form in Excel or a fillable PDF format.

The administrative services officer is tasked with preparing the TDA claim forms, which are reviewed by the executive director and the TAC. The *CCOG Policies and Procedures Manual* contains an overview of personnel staffing classifications and duties. In addition, under the Funding Mechanisms and Application/Claim Process section of the manual, there is a brief overview of the CCOG’s role in the administration and allocation of the

TDA in Calaveras County. However, staff assignments involving TDA claims administration are not clearly delineated in the *Policies and Procedures Manual*. It is suggested that these roles be memorialized in the *Policies and Procedures Manual* for clarification and direction.

### Unmet Transit Needs

Unmet transit needs hearings are required by the TDA where claims can be made for streets and roads. The CCOG provides definitions and parameters to guide this process. During the audit period, the CCOG conducted a thorough unmet needs process annually involving public hearings and SSTAC analysis. Notices for public hearings were properly advertised in the *Calaveras Enterprise*, the local newspaper of general circulation; community websites; and on Calaveras Connect vehicles and Facebook page. Further input was gathered in the form of written or verbal communication from members of the community.

A *Request for Public Comments* form was circulated by the CCOG, Calaveras Connect staff and vehicles, CCOG website, and social service agencies and at public hearings. The CCOG also employed an online survey form via the SurveyMonkey platform to solicit community feedback. Public hearings were conducted during the FY 2017-18, FY 2018-19, and FY 2019-20 unmet transit needs process. Public hearings are generally conducted in April during the CCOG Board meetings in San Andreas and the City of Angels Council meetings in Angels Camp.

Staff generally prepares an Unmet Transit Needs Findings Report, which encompasses an overview of the 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 populations are drawn from the 2010 US Census and the 2014 American Community Survey 5-Year Population Estimates. The 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 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 were no unmet transit needs that were deemed reasonable to meet. However, there were several additional recommendations for service enhancements made each year of the unmet transit needs process. As part of the unmet needs process for FY 2017-18, the SSTAC recommended continued efforts to evaluate service alternatives for out-of-county medical trips. The SSTAC did acknowledge the transit system's efforts to serve out-of-county trips to Stockton through the Delta Gold Line, which was discontinued due to low ridership. Another recommendation involved the exploration of more cost-effective and innovative partnerships with private nonprofit or for-profit entities to serve areas not accessible by transit or that were too cost prohibitive. Examples include partnerships with private companies such as Uber or Lyft to accommodate last mile/first mile trips.

For FY 2018-19, there were no unmet transit needs identified as reasonable to meet but the SSTAC forwarded three additional recommendations for further consideration. The recommendations involved coordination with the Mark Twain Medical Center to ensure transit access and service is provided to the new clinic planned in Valley Springs at Vista Del Lago and SR 26; providing direct access and transportation to the hospital in Jackson; and exploring an alternative stop location in Mokelumne Hill for more accessibility to the downtown area.

For FY 2019-20, like the prior year, there were no unmet transit needs identified as reasonable to meet. However, the SSTAC recognized the COG's involvement in the Coordinated Plan update and sought recommendations from that process to address ongoing unmet needs.

Upon conclusion of the unmet needs process, the 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 Findings Report.



## Public Information and Alternative Transportation

The CCOG has been active in communicating its mission and role to the region as well as forging partnerships with other agencies in neighboring counties. The 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. Its 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 its projects and programs, structure and governing body, and upcoming meetings and workshops. It contains the names, email addresses, and phone numbers for staff, 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>).

With regard to social media engagement, the 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 299 likes and 329 follows.

Alternative transportation efforts have been promoted through the Walk-Bike Calaveras initiative sponsored by the CCOG. Walk-Bike Calaveras is a resource to help residents and visitors take advantage of the many transportation options and resources in Calaveras County involving cycling, walking, transit, and Safe Routes to Schools. The dedicated website, <http://walkandbikecalaveras.org/>, has an interactive map composed of four layers for paved bikeways, walking routes, recreational trails, and future trail improvements. Other ways that active transportation is promoted is through focused outreach to local school districts and providing marketing support to the CTA and the unmet transit needs process.

Pursuant to the federal Civil Rights Act of 1964, the CCOG has an adopted Title VI Program. The CCOG updated its Title VI Program in September 2018. 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 the CCOG requiring public participation processes.

## Grant Application and Management

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

The 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. The CCOG's role for Calaveras County is to review and be an integral part of state and federal funding assistance that promotes interjurisdictional coordination. Eligible recipients are notified of grant opportunities for vital infrastructure projects programmed in published plans. Grant development is an ongoing work element of the annual OWP involving a number of tasks and work products.

The COG utilizes QuickBooks to manage and track funding. Online capital improvement plans for the City of Angels Camp and the County are also monitored. The administrative services officer is responsible for grant management, and the transportation planner 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. The CCOG provides application and programming support to the County transit program for Federal Transit Administration (FTA) grant programs as well as for California Office of Emergency Services (CalOES) and Public Transportation Modernization, Improvement and Service Enhancement (PTMISEA), as well as State of Good Repair and Low Carbon Transit Operations Program state grant programs toward operations, planning, and capital projects.

Funding from the PTMISEA program has been used toward bus procurement, engine replacements, bus shelters, bus stop improvements, and a vehicle maintenance lift. The CCOG has had to approve many extensions as well as amendments/revisions to the PTMISEA and CalOES expenditure plans to help ensure project delivery and reporting. During the audit period, the CCOG was instrumental in facilitating the award and execution of grants for local recipients and projects. FTA Section 5339 funding was received for CTA bus replacement.

As part of its mobility management coordination efforts, the CCOG coordinated with local area non-profits on FTA Section 5310 grant applications to support a mobility management activities and specialized transportation. The CCOG has continued to work with the SSTAC to establish mobility management as a priority and identify processes in the Coordinated Plan. This process has included mobility management updates from Common Ground and support for efforts to coordinate and centralize mobility information.

Following the implementation of the web-based CIP (<http://ccogcip.com/index.php>), the 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 email notification feature to advise of deadlines and reports are generated quarterly. Approximately \$20 million in projects have been identified and tracked in the CIP.

The CCOG was also successful in obtaining several Caltrans planning grants, as well as through partnerships with other regions such as the Zero Emissions Vehicle Readiness Plan with Tuolumne County Transportation Council. The 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.

As mentioned earlier in this section, CCOG has also provided technical support and submitted applications on behalf of the City and County to fund infrastructure projects. During this audit period, CCOG assisted in receiving nearly \$4 million in Active Transportation Program (ATP) and Highway Safety Improvement Program (HSIP) funding.

## Section V

### Findings and Recommendations

The following material summarizes the findings obtained from the triennial audit covering FYs 2018 through 2020. 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. The 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.
3. The CCOG satisfactorily implemented four of the six prior performance audit recommendations. One recommendation was partially implemented concerning the appointment of a student representative to the SSTAC. The recommendation not implemented involved developing a format and content for an annual CCOG report, which does not impact overall compliance with the TDA statute. The four recommendations satisfactorily implemented pertained to partnering and identifying mobility management strategies; updating the new appointee orientation for the SSTAC; furthering accountability toward compliance with provisions of the TDA; and implementing “timely use of funds” guidelines and enforcement.
4. 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 current executive director was appointed by the board in July 2017. The administrative services officer, who served as interim executive director, separated from the COG in January 2020. The current administrative services officer joined the COG in February 2020, having previously been employed by the Calaveras County Auditor-Controller. The administrative assistant has been with the COG for four years.
5. CCOG was instrumental in the formation of the CTA. The CTA was formed under a JPA between the City of Angels Camp and the County of Calaveras on March 6, 2018. The CTA assumed full responsibility for administration of the public transit system from County management on July 1, 2018. The governing board of the CTA is the same as the CCOG.

6. The 2017 RTP was 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 CCOG initiated an update to the RTP during the audit period. The 2021 RTP update includes a 20-year vision of policies and regionally significant improvements. The goals established for the 2021 RTP address safety, the environment, equity, and climate change.
7. The CCOG prioritized project delivery involving the realignment of a section of SR 4 between Copperopolis and Angels Camp. The funding strategy established and executed during the audit period for delivering the project was to focus on advancing the western segment from Bonanza Mine Way to Appaloosa Road to “shovel ready” status with the goal of attracting state and federal funding.
8. 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.
9. The *CCOG Policies and Procedures Manual* serves as an orientation guide for new CCOG members and employees as well as providing an operational guide and bylaws concerning procedures and activities to ensure the smooth and proper execution of CCOG-related business. The manual underwent two amendments during the audit period (September 2018 and June 2019) as well as a subsequent amendment in October 2020.
10. In response to state legislation creating the ATP, the CCOG developed its own ATP with the creation of a volunteer position with a background in public health as well as creating a website called Walk-Bike Calaveras and working with local school districts on creating walking and biking educational programs for the students.
11. The CCOG provides a platform for transit service planning and performance review through the CTA and SSTAC. The CCOG commissioned an update to the Calaveras County SRTP, which was finalized in January 2021. The prior SRTP was adopted in 2016. The aim of updating the SRTP was to evaluate services currently provided by Calaveras Connect and develop a plan to improve system performance and provision over a five-year horizon.
12. There were no unmet transit needs that were reasonable to meet during the audit period. However, the Unmet Transit Needs Findings Report did include several additional recommendations for service enhancements made each year of the unmet transit needs process.
13. The 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 its 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 updated during the audit period and includes a link to a Facebook social media page.

14. The 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 is involved in monitoring, scope of work, milestones, and reporting. As part of its mobility management coordination efforts and role as the RTPA, the CCOG coordinated with local non-profit agencies to facilitate FTA Section 5310 grant applications to support mobility management and coordinated transportation activities. The effort was successful and the CCOG has continued to work with the SSTAC to establish mobility management as a priority and identify processes in the Coordinated Plan. In addition, staff furthered the development of the online CIP database.

## Triennial Audit Recommendations

**1. Conduct strategic planning and goal setting exercises involving the Board and executive director, given the added oversight and administration of the CTA.**

The audit period saw a turnover of personnel at the COG as well as the formation of the CTA, which is administered and staffed by the COG. The executive director was appointed to the position at the beginning of the period. Board members interviewed for this performance audit have spoken highly of the administrative capabilities of the executive director and the COG staff. After having successfully integrated new staff and overseen the formation and administration of the CTA and planning studies, it is suggested that the COG move forward on strategic planning and goal setting involving the executive director and the Board. Given the mandates for zero emission vehicle technologies and the delivery of critical corridor improvements, a strategic planning process would help to clarify the mission and priorities of the COG internally as well as further its role as a regional advocate.

**2. Document separation of staff roles in TDA administration for claiming funds for the CTA and approving the claim.**

The *CCOG Policies and Procedures Manual* contains an overview of personnel staffing classifications and duties. In addition, under the Funding Mechanisms and Application/Claim Process section of the manual, there is a brief overview of CCOG's role in the administration and allocation of the TDA in Calaveras County. During the audit interview process, it was disclosed that the administrative services officer prepares the TDA claim forms, which are reviewed by the executive director and the Technical Advisory Committee. The CCOG Board then approves the claim. It is suggested that these roles be memorialized in the *Policies and Procedures Manual* for clarification, transparency, and direction.

**3. Update the CCOG TDA Claims Checklist and consider the implementation of an electronic claims form.**

The CCOG TDA Guidebook was last updated in June 2016. Since that time, there have been several amendments to the TDA statute as well as a restructuring of the transit claimant relationship with the formation of the CTA. For example, AB 1113 changed the filing timeline for the transit operator financial transactions report to the State Controller from 90 days to seven months and using audited data. While CCOG and the CTA are compliant with this particular change, the standard assurances in the claim continues to show the 90-day report. The TDA Guidebook also does not show this updated change in the submittal date. Further, the timeliness of the calculation of the State Transit Assistance eligibility criteria should accompany the claim timelines to enable the CTA to determine and budget whether any of these funds will be claimed for operations rather than capital. Another update for consideration would be the

implementation of an electronic claims form in Excel or a fillable PDF format. This would accommodate quick modifications as necessary to the claims form format and instructions based on changes to TDA policy.