



Inyo County Local Transportation Commission

TDA Triennial Performance Audit of the
Inyo County Local Transportation Commission
(as the RTPA) for FY 2021/22 - FY 2023/24



Table of Contents

Chapter 1 Executive Summary	1
Chapter 2 Audit Scope and Methodology	5
Chapter 3 Overview of the Inyo County LTC.....	9
Chapter 4 Program Compliance	21
Chapter 5 Prior Recommendations	27
Chapter 6 Functional Review.....	31
Chapter 7 Findings and Recommendations	35



This page intentionally blank.



Table of Exhibits

Exhibit 1.1 Summary of Audit Recommendations.....	3
Exhibit 3.1 Inyo County LTC Organizational Chart.....	10
Exhibit 3.2 2023 RTP Goals, Objectives, and Policies	12
Exhibit 4.1 Transit Development Act Compliance Requirements	23
Exhibit 7.1 Audit Recommendations	37



This page intentionally blank.



Chapter 1 | Executive Summary

The Triennial Performance Audit of the Inyo County Local Transportation Commission (LTC) covers a three-year period ending June 30, 2024. The California Public Utilities Code requires all Regional Transportation Planning Agencies conduct an independent Triennial Performance Audit in order to be eligible for Transportation Development Act (TDA) funding.

In 2025, the Inyo County Local Transportation Commission selected Moore & Associates, Inc., to prepare Triennial Performance Audits of itself as the RTPA and the single transit operator to which it allocates TDA funding. Moore & Associates, Inc. is a consulting firm specializing in public transportation. Selection of the consultant followed a competitive procurement process.

This chapter summarizes key findings and recommendations developed during the Triennial Performance Audit (TPA) of the LTC's public transit program for the period:

- Fiscal Year 2021/22,
- Fiscal Year 2022/23, and
- Fiscal Year 2023/24.

The auditors conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require the auditors plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our review objectives. Moore & Associates, Inc. believes the evidence obtained provides a reasonable basis for its findings and conclusions.

The review was also conducted in accordance with the processes established by the California Department of Transportation, as outlined in the *Performance Audit Guidebook for Transit Operators and Regional Transportation Planning Entities*.

The Triennial Performance Audit includes five elements:

1. Compliance requirements,
2. Follow-up of prior recommendations,
3. Analysis of internal goal setting and strategic planning efforts,
4. Review of the RTPA's functions and activities, and
5. Findings and recommendations.

Test of Compliance

With three exceptions, the LTC adheres to Transportation Development Act (TDA) regulations in an efficient and effective manner:

1. The LTC did not complete its fiscal audits for FY 2021/22 and FY 2022/23 prior to the June 30 deadline.



2. The LTC's State Controller Report for FY 2023/24 was submitted after the January 31 deadline.
3. The LTC did not certify completion of the ETSA audit to Caltrans upon its completion in 2023.

Status of Prior Recommendations

The prior Triennial Performance Audit – completed in 2022 by Moore & Associates, Inc. for the three fiscal years ending June 30, 2021 – included the following recommendations:

1. The LTC must ensure ESAAA completes an annual fiscal audit of its TDA funding, and withhold TDA funding as necessary if the audit is not completed on time.
Status: No longer relevant.
2. Clearly identify both the individual responsible for submitting the State Controller Report as well as the deadline for doing so.
Status: Implemented.
3. Ensure future Triennial Performance Audits are completed prior to the established deadline.
Status: Implemented.
4. Ensure documentation of the submittal of the RTPA's triennial performance audit and certification of the operator's triennial performance audit is maintained and can be provided during the next triennial performance audit.
Status: Partially implemented.
5. The LTC should adopt criteria for the evaluation of claims under Article 4.5.
Status: No longer relevant.
6. The LTC must develop and adopt appropriate performance criteria for the ESAAA, to be evaluated as part of the TDA claims process.
Status: No longer relevant.
7. Update the calculation methodology for the second (average) STA efficiency test and use the smallest percentage if funds must be restricted for capital purposes.
Status: Implemented.
8. Reevaluate the LTC's claims process and forms, including how the provided data is reviewed and eligibility for funding is determined.
Status: Implemented.

Goal Setting and Strategic Planning

The primary regional planning document is the Regional Transportation Plan (RTP). The RTP is a long-range (20-year) transportation plan providing a coordinated vision for regional transportation investments. As the RTPA, the Inyo County Local Transportation Commission is required to prepare and adopt an updated RTP every four years. It must be consistent with other planning guidance in the region. The current RTP was adopted on November 29, 2023.



The Inyo County LTC is also responsible for regional planning for a variety of regional transportation-related topics, Regional plans completed during the audit period include the 2023 Inyo County Active Transportation Plan, 2023 Inyo County Economic and Demographic Profile, and 2022 Inyo County Local Road Safety Plan.

Findings and Recommendations

Based on the current review, we submit the aforementioned TDA compliance findings.

1. The LTC did not complete its fiscal audits for FY 2021/22 and FY 2022/23 prior to the June 30 deadline.
2. The LTC's State Controller Report for FY 2023/24 was submitted after the January 31 deadline.
3. The LTC did not certify completion of the ETSA audit to Caltrans upon its completion in 2023.

We identified no functional findings.

In completing this Triennial Performance Audit, we submit the following recommendations for the LTC as the RTPA. They have been divided into two categories: TDA Program Compliance Recommendations and Functional Recommendations. TDA Program Compliance Recommendations are intended to assist in bringing the agency into compliance with the requirements and standards of the TDA, while Functional Recommendations address issues identified during the Triennial Performance Audit that are not specific to TDA compliance.

Exhibit 1.1 Summary of Audit Recommendations

TDA Compliance Recommendations		Importance	Timeline
1	Work with the County Auditor to ensure the LTC's fiscal audits can be completed by the June 30 deadline.	Medium	FY 2024/25
2	Ensure the RTPA's State Controller Financial Transaction Reports are submitted prior to the stated deadline.	High	FY 2024/25
3	Ensure the LTC certifies the completion of the ETA's Triennial Performance Audit to Caltrans upon its completion.	High	FY 2025/26



This page intentionally blank.



Chapter 2 | Audit Scope and Methodology

The Triennial Performance Audit (TPA) of the Inyo County Local Transportation Commission covers the three-year period ending June 30, 2024. The California Public Utilities Code requires all Regional Transportation Planning Agencies conduct an independent Triennial Performance Audit in order to be eligible for Transportation Development Act (TDA) funding.

In 2025, the LTC selected Moore & Associates, Inc., to prepare Triennial Performance Audits of itself as the RTPA and the single transit operator to which it allocates funding. Moore & Associates, Inc. is a consulting firm specializing in public transportation. Selection of Moore & Associates, Inc. followed a competitive procurement process.

The Triennial Performance Audit is designed to be an independent and objective evaluation of the LTC as the designated RTPA for Inyo County. Direct benefits of a triennial performance audit include providing RTPA management with information on the economy, efficiency, and effectiveness of their programs across the prior three years; helpful insight for use in future planning; and assuring legislative and governing bodies (as well as the public) that resources are being economically and efficiently utilized. Finally, the Triennial Performance Audit fulfills the requirement of PUC 99246(a) that the RTPA designate an independent entity other than itself to conduct a performance audit of its activities as well as those of each operator to whom it allocates TDA funding.

This performance audit was conducted in accordance with generally accepted government auditing standards. Those standards require that the audit team plans and performs the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for its findings and conclusions based on the audit objectives. We believe the evidence obtained provides a reasonable basis for our findings and conclusions.

The audit was also conducted in accordance with the processes established by the California Department of Transportation (Caltrans), as outlined in the *Performance Audit Guidebook for Transit Operators and Regional Transportation Planning Entities*, as well as *Government Audit Standards* published by the U.S. Comptroller General.

Objectives

A Triennial Performance Audit has four primary objectives:

1. Assess compliance with TDA regulations,
2. Review actions taken by the RTPA to implement prior recommendations,
3. Evaluate the efficiency and effectiveness of the RTPA through a review of its functions, and
4. Provide sound, constructive recommendations for improving the efficiency and functionality of the RTPA.



Scope

The TPA is a systematic review of performance evaluating the efficiency, economy, and effectiveness of the regional transportation planning agency. The audit of the Inyo County Local Transportation Commission included five tasks:

1. Review of compliance with TDA requirements and regulations.
2. Assessment of the implementation status of recommendations included in the prior Triennial Performance Audit.
3. Analysis of the LTC's internal goal setting and strategic planning functions.
4. Examination of the following functions:
 - Administration and Management,
 - Transportation Planning and Regional Coordination,
 - Claimant Relationships and Oversight,
 - Marketing and Transportation Alternatives, and
 - Grant Applications and Management.
5. Recommendations to address opportunities for improvement based on analysis of the information collected and the review of the RTPA's core functions.

Methodology

The methodology for the Triennial Performance Audit of the LTC as the RTPA included thorough review of documents relevant to the scope of the review, as well as information contained on the LTC's website. The documents reviewed included the following (spanning the full three-year period):

- Triennial Performance Audit reports for the prior review period;
- Annual budgets;
- Audited financial statements;
- State Controller Reports;
- Agency organizational chart;
- Board meeting minutes and agendas;
- Policies and procedures manuals;
- Regional planning documents;
- Overall work plans;
- Article 8 Unmet Transit Needs documentation;
- TDA claims manual; and
- TDA and transit funding allocations to operators.

The methodology for this audit included a virtual site visit with LTC representatives on April 9, 2025. The audit team met with Mike Errante (LTC Executive Director), Justine Kokx (LTC Transportation Planner), and Phil Moores (ESTA Executive Director), and reviewed materials germane to the triennial audit.



The report is comprised of seven chapters divided into three sections:

1. Executive Summary: A summary of the key findings and recommendations developed during the Triennial Performance Audit process.
2. TPA Scope and Methodology: Methodology of the audit and pertinent background information.
3. TPA Results: In-depth discussion of findings surrounding each of the subsequent elements of the audit:
 - Compliance with statutory and regulatory requirements,
 - Progress in implementing prior recommendations,
 - Goal setting and strategic planning,
 - Functional review, and
 - Findings and recommendations.



This page intentionally blank.



Chapter 3 | Overview of the Inyo County LTC

The Inyo County Local Transportation Commission (LTC) is the regional transportation planning agency for Inyo County. The Inyo County Local Transportation Commission was created in 1972.

Roles and Responsibilities

As the Regional Transportation Planning Agency (RTPA) for Inyo County, the LTC is responsible for developing regional transportation planning and programming documents. Specific planning and programming responsibilities include:

- Administration of Transportation Development Act (TDA) funds,
- Development and implementation of the Inyo County Regional Transportation Plan (RTP),
- Preparation and implementation of the annual Overall Work Program (OWP),
- Preparation of the Regional Transportation Improvement Program (RTIP),
- Review and comment on the State Transportation Improvement Program (STIP), and
- Review and prioritization of grant applications for various funding programs.

Inyo County LTC Board of Commissioners

The Inyo County Local Transportation Commission (LTC) is a six-member commission that serves as the Regional Transportation Planning Agency (RTPA) for Inyo County. The LTC is comprised of two members each from the Inyo County Board of Supervisors and the Bishop City Council, while the remaining two seats are Board- and Council-appointed at-large representatives. The Inyo County Public Works Director serves as the Executive Director of the LTC.

The LTC meets on the third Wednesday of each month at 8:00 a.m., with a public comment period scheduled during the meeting. Meetings are held at the City of Bishop Council Chambers (301 W. Line St., Bishop) except for the meetings convened in the first month of each quarter (January, April, July and October), which are held in Independence (224 N. Edwards St., Independence) or another location in a southerly community in the County. The Chairperson of the LTC confirms the designated meeting date and location of each LTC meeting.

During the audit period, the following individuals served as voting members of the Inyo County Local Transportation Commission:

- Celeste Berg, City of Bishop (2021 – 2024)
- Doug Thompson, County of Inyo (2021 – 2023)
- Scott Marcellin, County of Inyo (2023 – 2024)
- Jennifer Roeser, County of Inyo (2021 – 2024)
- Stephen Muchovej, City of Bishop (2021 – 2024)
- Jose Garcia, City of Bishop (2021 – 2024)
- Rick Pucci, County of Inyo (2021 – 2022)

The LTC does not have any committees with the exception of a social services transportation advisory council (SSTAC). The SSTAC is an advisory committee to the LTC addressing all transportation issues,

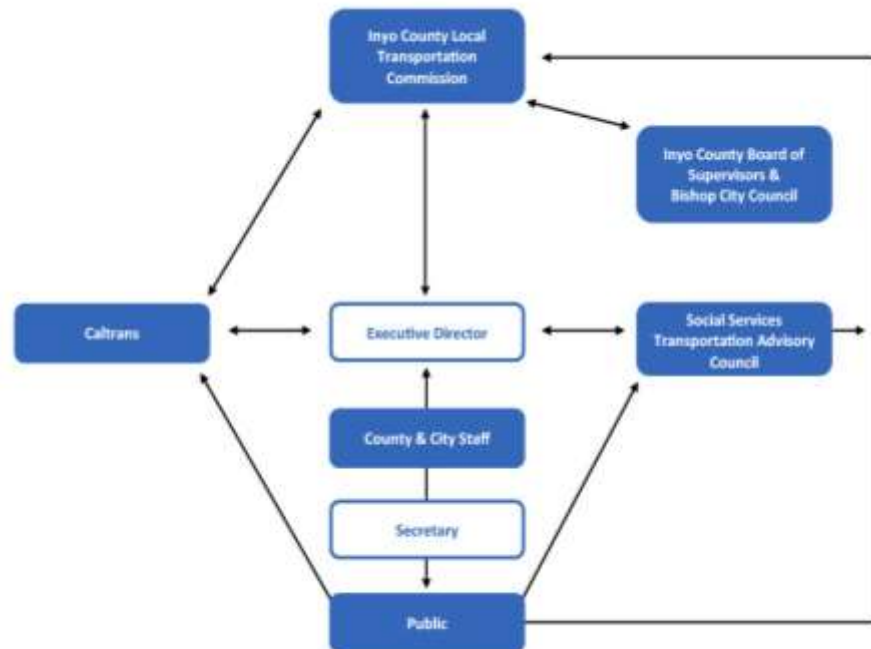


including the transit needs of transit dependent and transit disadvantaged persons. The SSTAC's input is used as part of the LTC's annual Unmet Transit Needs hearing and findings process.

Organization

Reporting directly to the LTC board is the Executive Director. An organizational chart is presented as Exhibit 3.1.

Exhibit 3.1 Inyo County LTC Organizational Chart



Goal setting and strategic planning

The LTC's primary regional planning document is the Regional Transportation Plan (RTP). The RTP is a long-range (20-year) transportation plan providing a coordinated vision for regional transportation investments. As the RTPA, the Inyo County Local Transportation Commission is required to prepare and adopt an updated RTP every four years. It must be consistent with other planning guidance in the region. The current RTP was adopted on November 29, 2023.

The 2023 RTP includes the three required elements (Policy Element, Action Element, Financial Element). The Policy Element includes eight individual goals. Each goal is supported by one or more objectives and policies (see Exhibit 3.2). A separate Modal Discussion chapter includes individual sections for each mode (such as Transit and Non-Motorized Facilities) and work element (such as Air Quality and Summary of Roadway and Bridge Needs). Performance measures for Mobility and Accessibility, Safety and Security, Transportation System Investment, Environmental and Health Sustainability, and Economic Sustainability, used to evaluate the performance and impact of policies and strategies included in the RTP, are provided as part of the Action Element.



Advisory groups involved in the development of the RTP included the LTC, its Social Services Transportation Advisory Council (SSTAC), and Caltrans. The LTC also conducted extensive public and stakeholder involvement that included opportunities for input from the general public, private and public transit and freight operators, and tribal governments. Other entities invited to participated in the process included adjacent county RTPAs; local, state, and federal resource agencies; Great Basin Unified Air Pollution Control District; chambers of commerce, truck traffic generators, public transit operators, human service agencies; and transportation-related advocacy groups. Tribal outreach included requests for input from five federally recognized tribal governments within Inyo County:

- Big Pine Paiute Tribe of the Owens Valley,
- Bishop Paiute Tribe,
- Fort Independence Community of Paiute Indians of the Fort Independence Reservation,
- Lone Pine Paiute-Shosone Tribe, and
- Death Valley Timbisha Shoshone Tribe.

While all five tribal governments were invited to participate, only the Bishop Paiute Tribe and Fort Independence Tribe provided copies of relevant tribal transportation plans, which were reviewed during RTP development.



Exhibit 3.2 2023 RTP Goals, Objectives, and Policies

Goal	Objective	Priority
Safety		
1: Provide a safe and secure transportation system for all users	1A: Secure funding to improve safety on state highways and local roadways.	1.1: Coordinate with Caltrans to fund safety improvement projects that meet the goals of the California Strategic Highway Safety Plan.
		1.2: Coordinate with local agencies to maintain updated safety data through special studies or systemic safety analyses necessary to identify safety issues and secure funding.
		1.3: Pursue all types of federal and state discretionary funding, such as the Highway Safety Improvement Program (HSIP).
	1B: Develop and retrofit transportation facilities and corridors to improve safety.	1.4: Provide support to identify, prioritize, and eliminate conditions on local and regional roadways that currently or may pose a safety risk in coordination with Caltrans and local jurisdictions.
		1.5: Evaluate accident data along the State Highways and local roadways at least annually to identify trends and areas of concern.
		1.6: Work with Caltrans on planning for shoulder improvements to reduce conflicts between goods movement, vehicles, and non-motorized users on state highways.
		1.7: Facilitate safer truck transportation and truck parking and ease the impact of truck traffic on residential areas.
		1.8: Utilize existing strategic safety assessments and plans to identify critical needs, such as the Inyo County Local Road Safety Plan, and support future safety assessments.
		1.9: Support the national “Towards Zero Deaths” vision for a reduction in fatalities on the highway system.
		1C: Reduce the number of bicycle and pedestrian-related injuries and fatalities.
	1.11: Evaluate bicycle and pedestrian crash data when assessing the impact of a potential roadway project on safety.	
	1.12: Work with Caltrans to enhance pedestrian facilities and crosswalks along State highways as needed to improve safety and provide connectivity between commercial areas, residential areas, recreational areas, schools, and the transit system.	
	1.13: Utilize Complete Streets strategies to improve safety and increase the use of active modes of transportation.	
	1.14: Support Safe Routes to Schools projects that increase the safety and numbers of students walking and biking to school.	
Climate		
2: Increase the resilience of the transportation system to climate change.	2A: Pursue projects that improve the resiliency of the transportation system to extreme weather events.	2.1: Coordinate with Caltrans and local jurisdictions to identify transportation infrastructure that is most vulnerable to impacts of severe weather events such as culverts, bridges, and roadways located in a flood zone.
	2B: Prepare for multi-hazard emergency evacuation/response.	2.2: Coordinate with ESTA to ensure readiness in the event of emergency evacuation.
		2.3: Coordinate with local agencies and first responders to reduce hazard impacts in accordance with the Inyo County Multi-jurisdictional Hazard Mitigation Plan.



INYO COUNTY LOCAL TRANSPORTATION COMMISSION
TDA TRIENNIAL PERFORMANCE AUDIT, FY 2022 – FY 2024
Final Report

Goal	Objective	Priority
Climate		
2: Increase the resilience of the transportation system to climate change. (continued)	2C: Support statewide goals for the reduction of GHG emissions.	2.4: Invest in alternative fueling technology infrastructure including technologies such as hydrogen and electric.
		2.5: Support the development of US 395 as an Alternative Fuels Corridor.
		2.6: Support the development of alternative fueling infrastructure along interregional routes such as SR 190.
		2.7: Seek out funding opportunities to deploy public electric vehicle charging stations along state and local roadways.
		2.8: Prepare for the transition of the public transit agency vehicle fleet to ZEVs in accordance with CARB ICT guidance.
		2.9: Reduce per capita Vehicle Miles Traveled (VMT) by 30 percent over the planning period.
Infrastructure		
3: Maintain a high-quality transportation system.	3A: Maintain streets, roads, and highways at a safe and acceptable level.	3.1: Keep the Pavement Management Program up to date and improve the average Pavement Condition Index (PCI) for county roadways.
	3B: Maximize state and federal funds.	3.2: Enter into Memorandums of Understanding (MOUs) with adjacent counties to pursue mutually beneficial roadway improvement projects and leverage federal and state funding.
		3.3: Ensure that transportation investments, including active transportation projects, use ranking and selection criteria proposed as part of this plan.
	3C: Provide proper levels of road maintenance to avoid unnecessary vehicle wear and reduce the need for costlier rehabilitation in the future.	3.4: Utilize the Capital Improvement Program (CIP) to prioritize maintenance projects for the short term and identify available funding sources.
		3.5: Evaluate the impact of heavy truck traffic has pavement conditions and maintenance costs.
	3D: Pursue improvements along the US 395 corridor.	3.6: Provide a 4-lane facility for US 395 and CA 14 between Southern California population centers and Inyo County.
		3.7: Enter into MOUs with Mono County, Kern Council of Governments, and San Bernardino Associated Governments to provide funding for safety and roadway improvements on US 395 in Mono County.
	3E: Ensure adequate capacity on State Routes (SR).	3.8: Increase capacity of SRs as needed to maintain concept LOS.
	3F: Ensure the existence of a safe, reliable, and fiscally responsible public transit agency in Inyo County.	3.9: Support ESTA in all aspects of operations and capital improvements by the ESTA Short Range Transit Plan.
	3G: Maintain, preserve, and enhance the existing airports and airstrips within the county.	3.10: Seek all available funding sources for airport maintenance and enhancement.
		3.11: Promote land use compatibility with the surrounding environment for each airport.
		3.12: Encourage and foster effective and efficient use of existing airport facilities.
		3.13: Maintain and improve commercial usage at and around the Bishop Airport.
		3.14: Maintain and expand passenger air service at the Bishop Airport.



Goal	Objective	Priority
Infrastructure		
3: Maintain a high-quality transportation system. (continued)	3H: Support comprehensive transportation planning.	3.15: Strive for roadway improvements that do not increase VMTs or include mitigation strategies and support state GHG emission reduction goals.
		3.16: Recognize the relationship between the RTP, the Inyo County General Plan, and the City of Bishop General Plan and strive to accomplish the aims and purposes of these plans.
		3.17: Continually plan, prioritize, design, and develop a comprehensive transportation system in cooperative partnership between the county, city, state officials, the Local Transportation Commission, the Inyo County Planning Commission, City of Bishop Planning Commission, public and private groups, Inyo County Tribal Governments, and other interested entities.
Equity		
4: Ensure that all communities have access to transportation facilities throughout the County.	4A: Ensure equitable access to public transit services.	4.1: Support and promote accessibility in public transportation to the maximum extent practicable, including continued support of special service vans that provide a high level of service to low-mobility groups.
		4.2: Continue to conduct outreach to disadvantaged communities to understand areas for improvement in public transit services.
		4.3: Identify transit facilities, such as bus shelters, staging areas, base stations, transit hubs, etc., and potential funding sources.
	4B: Support public transit services, both existing services and future services that are identified by the established “unmet transit needs” process.	4.4: Encourage and support the use of public transportation grants from state and federal programs to the maximum extent possible.
		4.5: Promote public transit to raise awareness, encourage ridership, and create an understanding of how to use transit systems.
		4.6: Cooperatively develop long-range plans with transit operators that provide guidance and assistance in determining capital and operating requirements.
	4C: Ensure that non-motorized facilities are accessible to all users.	4.7: Develop new non-motorized facilities in compliance with ADA requirements.
		4.8: Consider ADA requirements when rehabilitating, repairing, or extending existing pedestrian and bicycle facilities.
		4.9: Gather community input whenever feasible before designing and implementing changes to non-motorized facilities.
	4D: Support tribal governments in the improvement of transportation facilities on and connecting to tribal land.	4.10: Jointly pursue grant funding where feasible to capitalize on funding, resources, and expertise.
		4.11: Conduct outreach to and engage with tribal entities during transportation planning efforts.



Goal	Objective	Priority
Accessibility/Mobility		
4: Ensure that all communities have access to transportation facilities throughout the County. (continued)	4E: Utilize open and equitable processes to scope, prioritize, fund, and construct transportation projects.	4.12: Incorporate public outreach as a fundamental component of the transportation planning and decision-making process, encouraging input from all interested and affected groups and individuals.
		4.13: Include, in project analysis, the identification and mitigation of all impacts on all affected segments of the population, particularly disadvantaged communities.
		4.14: Design transportation facilities to meet the needs of all users including older adults, children, and people with disabilities.
5: Improve multimodal connectivity and access.	5A: Prioritize connectivity between existing facilities where feasible.	5.1: Increase north/south connectivity of roadways, bike paths, and sidewalks within the City of Bishop to create an alternative to US 395.
		5.2: Pursue grant funding to connect and extend existing bicycle and pedestrian facilities within and to community centers.
	5B: Promote multimodal connections.	5.3: Encourage intermodal transfer of both passengers and freight at airports.
		5.4: Provide for the development of multimodal facilities at airports where appropriate.
		5.5: Promote multimodal connections between communities and recreation destinations.
		5.6: Support public and private shuttles between communities and trailheads.
		5.7: Raise public awareness of ESTA services and rideshare opportunities through media and promotional events.
	5C: Support interregional multimodal transportation.	5.8: Encourage interregional and intercity bus lines to provide more attractively scheduled service into and within Inyo County.
		5.9: Develop regional active transportation corridors.
		5.10: Stay informed of multimodal transportation planning efforts of adjacent counties.
Quality of Life/Public Health		
6: Enable vibrant and healthy communities.	6A: Encourage the development of non-motorized facilities that will be convenient to use, easy to access, continuous, safe, and integrated into a multimodal transportation network in support of Toward an Active California.	6.1: Develop non-motorized facilities that serve as many segments of the population as possible.
		6.2: Consider non-motorized modes of transportation in planning processes.
		6.3: Plan for and provide a continuous and easily accessible bikeway system within the region, including connections to recreation destinations.
		6.4: Promote projects that close gaps in community pedestrian networks, particularly along Safe Routes to School and between residential and commercial areas.
		6.5: Plan for the increase in electric bicycles for commuting in Inyo County, including the need for charging infrastructure.
		6.6: Introduce and promote education, encouragement, and outreach programs for bicycle and pedestrian travel.
	6B: Enhance opportunities for safe bicycle and pedestrian travel on and across state highways and local roadways.	6.7: Encourage the inclusion of bicycle facilities on roadways during rehabilitation projects where feasible.
		6.8: Pursue discretionary grant-funding programs for implementing the bicycle and pedestrian improvements listed in this plan.



Goal	Objective	Priority
Quality of Life/Public Health		
6: Enable vibrant and healthy communities. (continued)	6C: Improve livability and health in the County through thoughtful land use and transportation decisions.	6.9: Assist local jurisdictions in taking a regional approach to land use decisions and developing a road network that supports the RTP goals and state goals.
		6.10: Encourage all County entities to actively participate in the RTP update process.
		6.11: Establish formal agreements and acquire the appropriate right-of-way from the City of Los Angeles to implement transportation facilities on LADWP property in Inyo County as needed.
		6.12: Address liability issues and potential impacts to resources and operations that may result from using LADWP right-of-way for public transportation facilities.
		6.13: Support the revitalization of downtown Bishop in accordance with the Downtown Bishop Specific Plan and Mixed-Use Overlay.
	6D: Reduce the negative impacts of heavy truck traffic within communities.	6.14: Implement traffic calming measures along US 395 within community centers.
		6.15: Encourage overnight truck parking outside of densely populated community centers.
		6.16: Explore future options to divert truck traffic around residential and commercial districts of communities.
Environment		
7: Enhance environmental health and reduce negative transportation impacts.	7A: Consider all types of environmental impacts, including cumulative impacts, as part of the transportation project selection process.	7.1: Work with the project implementing agency to ensure that transportation projects will meet environmental quality standards set by Federal, State, and Local Resource agencies.
		7.2: Coordinate with the project implementing agency to determine the impact of the project on biological resources, hydrology, geology, cultural resources, and air quality before construction.
		7.3: Mitigate any environmental impacts according to natural resource agency standards.
	7B: Promote transportation policies and projects that support a sustainable environment and positively contribute to meeting statewide global warming emissions targets set in the Global Warming Solutions Act of 2006 (AB 32).	7.4: Coordinate with federal and state agencies and local air management districts on matters related to the air quality conformity process specified in the latest federal clean air requirements and legislation for transportation projects (transportation-related).
		7.5: Consider alternative transportation technologies, such as Zero Emission Vehicles and bike share programs.
		7.6: Coordinate with local and neighboring jurisdictions to identify mutually beneficial programs, projects, or partnership opportunities aimed at reducing or offsetting regionally produced GHG emissions.
		7.7: Develop a Zero Emission Vehicle Readiness Plan for the Inyo County region in cooperation with Caltrans and neighboring jurisdictions.



Goal	Objective	Priority
Environment		
7: Enhance environmental health and reduce negative transportation impacts. (continued)	7C: Reduce the demand for travel by single-occupant vehicles through transportation demand management and transportation system management techniques.	7.8: Increase the mode share for public transit and non-motorized travel through operational improvements and construction of bicycle, pedestrian, and park-and-ride facilities.
		7.9: Support public awareness of ESTA to increase the mode share for public transit.
		7.10: Encourage compact and infill development in accordance with the Inyo County Housing Element to minimize the construction of new roads and encourage walkable communities.
		7.11: Encourage local land use planning and community design that minimizes dependence on long-distance, single-occupant vehicle commute trips and encourages active transportation.
	7D: Improve the resiliency of transportation infrastructure to severe weather events.	7.12: Pursue funding for improvement projects that enhance the climate resiliency of the transportation system.
		7.13: Utilize existing and future plans, including Community Wildfire Protection Plans and climate adaptation plans, to identify high-priority transportation improvement projects.
		7.14: Mitigate impacts of severe weather events by maintaining the condition of transportation infrastructure and facilitating necessary maintenance, repair, and replacement.
Economic Vitality		
8: Promote economic stability and investment.	8A: Develop a transportation system that is financially constrained.	8.1: Ensure that the allocation of transportation funding dollars maximizes the “highest and best use” for interregional and local projects.
		8.2: Give priority to transportation projects designed to improve the efficiency, safety, and quality of existing facilities.
		8.3: Consider long-term maintenance costs for any new transportation infrastructure.
	8B: Consider transportation during the review of projects to ensure that transportation needs are addressed during the planning phase of development.	8.4: Ensure proper access is planned to residential, commercial, and industrial areas.
		8.5: Evaluate public transit access and availability for all residential and commercial projects.
		8.6: If transportation improvements are required as part of a new development, require the developer to share the cost of the improvements.
		8.7: Require development proposals to provide adequate parking allocations for the intended uses.
	8C: Provide for the parking needs of residents and visitors.	8.8: Provide adequate and convenient parking in the commercial core of Inyo County communities.
		8.9: Plan and develop easily accessed park-and-ride facilities and rest areas along major roadways.
	8D: Support the development or improvement of transportation facilities that provide alternative transportation connections between recreation destinations and communities.	8.10: Recognize the economic impact of investing in access to recreation destinations.



Goal	Objective	Priority
Economic Vitality		
8: Promote economic stability and investment. (continued)	8E: Promote commercial passenger air service at the Bishop Airport.	8.11: Ensure that accurate and reliable information is available to the public, stakeholders, and adjacent counties.
		8.12: Support expansion of passenger air service and facilities at Bishop Airport where feasible.
	8F: Facilitate the development of vibrant economic centers.	8.13: Address noise, traffic, and safety impacts of high levels of truck traffic within the community core.
		8.14: Pursue active transportation funding to expand pedestrian and bicycle infrastructure and multimodal connections.



Each RTP update builds upon prior efforts but is reflective of current and future conditions. Prior efforts used in the development of the 2023 RTP included the following:

- Inyo County General Plan Circulation Element (2001),
- City of Bishop General Plan Mobility Element (2012),
- Bishop Paiute Reservation Long-Range Transportation Improvement Plan (2013),
- Inyo County Active Transportation Plan (2015),
- Olancho Cartago Corridor Study (2020),
- Eastern Sierra Transit Authority Short-Range Transit Plan and Coordinated Transit-Human Services Transportation Plan (2021),
- Downtown Bishop Specific Plan and Mixed Use Overlay (2021),
- Caltrans Adaptation Priorities Report (2021),
- California Transportation Plan (CTP) 2050 (2021), and
- Fort Independence Indian Reservation Tribal Transportation Safety Assessment (2023).

The 2023 RTP Update was supported by the Inyo County LTC Public Procedures. Efforts were made through the RTP process to engage underserved communities, including extensive efforts to engage Tribal governments, conducting in-person outreach activities in disadvantaged communities, emailing stakeholder groups throughout the county, and advertising the survey and other outreach activities in English and Spanish. The following public engagement activities were undertaken as part of the 2023 update:

- Online community survey,
- Pop-up workshops in Bishop and Lone Pine,
- Public workshop in Tecopa focusing on non-motorized transportation needs, and
- Presentations at LTC meetings open to the public.

The Inyo County LTC is also responsible for regional planning for a variety of regional transportation-related topics. Regional plans completed during the audit period include the following:

- 2023 Inyo County Active Transportation Plan,
- 2023 Inyo County Economic and Demographic Profile, and
- 2022 Inyo County Local Road Safety Plan.



This page intentionally blank.



Chapter 4 | Program Compliance

This section examines the Inyo County Local Transportation Commission’s compliance with the State of California’s Transportation Development Act as well as relevant sections of California’s Public Utilities Commission code. An annual certified fiscal audit confirms TDA funds were apportioned in conformance with applicable laws, rules, and regulations. Although compliance verification is not a Triennial Performance Audit function, several specific requirements concern issues relevant to the performance audit. The Triennial Performance Audit findings and related comments are delineated in Exhibit 4.1.

Compliance was determined through discussions with LTC staff as well as an inspection of relevant documents, including the fiscal audits for each year of the triennium. Also reviewed were planning documents, Commission actions, and other related documentation.

With three exceptions, LTC adheres to Transportation Development Act (TDA) regulations in an efficient and effective manner:

1. The LTC did not complete its fiscal audits for FY 2021/22 and FY 2022/23 prior to the June 30 deadline.
2. The LTC’s State Controller Report for FY 2023/24 was submitted after the January 31 deadline.
3. The LTC did not certify completion of the ETSA audit to Caltrans upon its completion in 2023.

Developments Occurring During the Audit Period

For many operators, the FY 2021/22 – FY 2023/24 audit period reflected both the acute impacts of and recovery from the COVID-19 pandemic. By the end of the audit period – even earlier in some cases – most operators had exhausted federal relief funds, even though penalties for non-compliance with farebox recovery ratios continued to be waived. Many operators, even more than five years after the onset of the pandemic, still struggle with ridership that has yet to recover to pre-pandemic levels.

Given this is not the first Triennial Performance Audit to be conducted since the COVID-19 pandemic, this report will not focus on actions taken as a result of the health crisis. Instead, the compliance review, functional review, and resulting recommendations will focus on ensuring program sustainability once penalty waivers and other emergency legislation have ended.

Assembly Bill 90, signed into law on June 29, 2020, provided temporary regulatory relief for transit operators required to conform with Transportation Development Act (TDA) farebox recovery ratio thresholds in FY 2019/20 and FY 2020/21. Assembly Bill 149, signed into law on July 16, 2021, provided additional regulatory relief by extending the provisions of AB 90 through FY 2022/23 and adjusting definitions of eligible revenues and operating costs. Most recently, Senate Bill 125, signed into law on July 10, 2023, extended protections provided via earlier legislation through FY 2025/26. While this means the audit period covered by this audit is fully exempt from penalties for non-compliance with the farebox recovery ratio, for example, it also means that transit operators will likely need to be in compliance by the last year of the next audit period.



While the ability to maintain state mandates and performance measures is important, these measures enable transit operators to adjust to the impacts of COVID while continuing to receive their full allocations of funding under the TDA.

Together, these three pieces of legislation include the following provisions specific to transit operator TDA funding under Article 4 and Article 8:

1. Prohibits the imposition of the TDA revenue penalty on an operator that did not maintain the required ratio of fare revenues to operating cost from FY 2019/20 through FY 2025/26.
2. Expands the definition of “local funds” to enable the use of federal funding to supplement fare revenues and allows operators to calculate free and reduced fares at their actual value.
3. Adjusts the definition of operating cost to exclude the cost of ADA paratransit services, demand-response and microtransit services designed to extend access to service, ticketing/payment systems, security, some pension costs, and some planning costs.
4. Allows operators to use STA funds as needed to keep transit service levels from being reduced or eliminated through FY 2025/26.

SB 125 calls for the establishment of the Transit Transformation Task Force to develop policy recommendations to grow transit ridership and improve the transit experience for all users. In the 50-plus years since introduction of the Transportation Development Act, there have been many changes to public transportation in California. Many operators have faced significant challenges in meeting the farebox recovery ratio requirement, calling into question whether it remains the best measure for TDA compliance. In 2018, the chairs of California’s state legislative transportation committees requested the California Transit Association spearhead a policy task force to examine the TDA, which resulted in a draft framework for TDA reform released in early 2020. The Transit Transformation Task Force is required to submit a report of its findings and policy recommendations to the State Legislature by October 31, 2025. This report is expected to include recommendations for TDA reform, which may impact the next Triennial Performance Audit period.



Exhibit 4.1 Transit Development Act Compliance Requirements

Compliance Element	Reference	Compliance	Comments
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 monies apportioned to that area.	PUC 99231	In compliance	
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 (Article 3).	PUC 99233, 99234	In compliance	
The RTPA has established a social services transportation advisory council. The RTPA must ensure that there is a citizen participation process that includes at least an annual public hearing.	PUC 99238, 99238.5	In compliance	FY 2021/22: SSTAC meeting February 9, 2022 UTN hearing March 16, 2022 UTN hearing April 20, 2022 FY 2022/23: SSTAC meeting February 21, 2023 UTN hearing March 15, 2023 UTN hearing April 19, 2023 FY 2023/24: SSTAC meeting February 15, 2024 UTN hearing March 20, 2024 UTN hearing April 17, 2024
The RTPA has annually identified, analyzed, and recommended potential productivity improvements which could lower operating cost of those operators, which operate at least 50 percent of their vehicle service miles within the RTPA's jurisdiction. Recommendations include, but are not being limited to, those made in the performance audit. <ul style="list-style-type: none">• A committee for the purpose of providing advice on productivity improvements may be formed.• The operator has made a reasonable effort to implement improvements recommended by the RTPA as determined by the RTPA, or else the operator has not received an allocation that exceeds its prior year allocation.	PUC 99244	In compliance	
The RTPA has ensured that all claimants to whom it allocated 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.	PUC 99245	In compliance	FY 2021/22: January 30, 2023 FY 2022/23: January 19, 2024 FY 2023/24: December 20, 2024



INYO COUNTY LOCAL TRANSPORTATION COMMISSION
TDA TRIENNIAL PERFORMANCE AUDIT, FY 2022 – FY 2024
Final Report

Compliance Element	Reference	Compliance	Comments
The RTPA has submitted to the state controller an annual certified fiscal audit within 12 months of the end of the fiscal year.	CCR 6662	Finding	FY 2021/22: March 19, 2024 FY 2022/23: January 10, 2025 FY 2023/24: Pending
The RTPA has submitted within 90 days after the end of the fiscal year an annual financial transactions report to the state controller	CCR 6660	Finding	FY 2021/22: January 31, 2023 FY 2022/23: January 30, 2024 FY 2023/24: February 18, 2025
The RTPA has designated an independent entity to conduct a performance audit of operators and itself (for the current and previous triennia). For operators, the audit was made and calculated the required performance indicators, and the audit report was transmitted to the entity that allocates the operator's TDA money, 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.	PUC 99246, 99248	In compliance	Prior Triennial Performance Audits were completed by Moore & Associates in June 2022. Moore & Associates was engaged to prepare the current Triennial Performance Audits.
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 operators located in the area under its jurisdiction have been completed.	PUC 99246(c)	Finding	The prior audit of LTC was emailed to Caltrans on June 28, 2022. However, the RTPA did not certify completion of the ESTA audit the following year. (Partial compliance)
The performance audit of the operator providing public transportation services shall include a verification of the operator's cost per passenger, operating cost per vehicle service hour, passenger per vehicle service mile, and vehicle service hours per employee, as defined in Section 99247. The performance audit shall include 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.	PUC 99246(d)	In compliance	
The RTPA has established rules and regulations regarding revenue ratios for transportation operators providing services in urbanized and newly urbanized areas.	PUC 99270.1, 99270.2	Not applicable	
The RTPA has adopted criteria, rules, and regulations for the evaluation of claims filed under Article 4.5 of the TDA and the determination of the cost effectiveness of the proposed community transit services.	PUC 99275.5	Not applicable	There are no Article 4.5 claimants.



INYO COUNTY LOCAL TRANSPORTATION COMMISSION
TDA TRIENNIAL PERFORMANCE AUDIT, FY 2022 – FY 2024
Final Report

Compliance Element	Reference	Compliance	Comments
State transit assistance funds received by the RTPA are allocated only for transportation planning and mass transportation purposes.	PUC 99310.5, 99313.3, Proposition 116	In compliance	
The amount received pursuant to the 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.	PUC 99314.3	In compliance	
<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">• Consulted with the Social Services Transportation Advisory Council (SSTAC) established pursuant to PUC Section 99238;• Identified transit needs, including:<ul style="list-style-type: none">▪ Groups that are transit-dependent or transit-disadvantaged;▪ Adequacy of existing transit services to meet the needs of groups identified; and▪ Analysis of potential alternatives to provide transportation alternatives;• Adopted or reaffirmed definitions of "unmet transit needs" and "reasonable to meet";• Identified the unmet transit needs and those needs that are reasonable to meet; and• Adopted a finding that there are no unmet transit needs, that there are no unmet transit needs that are reasonable to meet, or that there are unmet transit needs including needs that are reasonable to meet. <p>If a finding is adopted that there are unmet transit needs, these needs must have been funded before an allocation was made for streets and roads.</p>	PUC 99401.5	In compliance	<p>LTC does not allocate TDA funds for streets and roads. It does follow the prescribed Unmet Transit Needs process.</p> <p>FY 2021/22: SSTAC meeting February 9, 2022 UTN hearing March 16, 2022 UTN hearing April 20, 2022</p> <p>FY 2022/23: SSTAC meeting February 21, 2023 UTN hearing March 15, 2023 UTN hearing April 19, 2023</p> <p>FY 2023/24: SSTAC meeting February 15, 2024 UTN hearing March 20, 2024 UTN hearing April 17, 2024</p>



This page intentionally blank.



Chapter 5 | Prior Recommendations

This section reviews and evaluates the implementation of prior Triennial Performance Audit recommendations. This objective assessment provides assurance the Inyo County Local Transportation Commission has made quantifiable progress toward improving both the efficiency and effectiveness of its programs.

The prior audit – completed in June 2022 by Moore & Associates, Inc. for the three fiscal years ending June 30, 2021 – included eight recommendations:

1. The LTC must ensure ESAAA completes an annual fiscal audit of its TDA funding, and withhold TDA funding as necessary if the audit is not completed on time.

Discussion: PUC 99276 requires recipients of Article 4.5 funds to submit an annual certified fiscal audit pursuant to PUC 99245. The ESAAA's TDA fiscal audit has historically been limited to its receipt and expenditure of TDA funds. During the prior audit, only one TDA fiscal audit was provided and that audit was completed well outside the timeframe established for the completion of TDA fiscal audits. The ESAAA's primary challenge was that it already undergoes other audits through the County and the California Department of Aging. In addition, the Transportation program is only a small portion of the ESAAA's mission, and the time and effort involved for an additional audit specific to the TDA is out of proportion with the percentage of the program funded through TDA. Regardless, the prior auditor noted it was essential the ESAAA complete an annual TDA fiscal audit that meets the requirements of the TDA legislation in order to continue to be in compliance with the TDA and eligible to receive funds.

Progress: ESAAA no longer receives TDA funding.

Status: No longer relevant.

2. Clearly identify both the individual responsible for submitting the State Controller Report as well as the deadline for doing so.

Discussion: PUC 99243 requires RTPAs submit their Financial Transaction Reports to the State Controller within seven months of the end of the fiscal year. During the prior audit, LTC did not provide the cover page for its report for FY 2018/19, and on-time submittal could not be verified. Neither the report or cover page were provided for FY 2020/21. The prior auditor recommended the deadline for submittal of the State Controller Report (January 31) be clearly noted on the RTPA's calendar, and responsibility for its completion should be clearly assigned. If access to audited data is contributing to the late submittal, LTC should work with its auditor to ensure data is available in advance of the deadline. In addition, LTC staff should ensure the complete report (including the cover page, whether signed or not) is stored in an appropriate location that can be easily accessed during the next Triennial Performance Audit.



Progress: During the current audit period, two of the three State Controller Reports were submitted on time, with the FY 2023/24 being submitted more than two weeks late. LTC was able to provide cover pages for all of the reports.

Status: Implemented.

3. Ensure future Triennial Performance Audits are completed prior to the established deadline.

Discussion: PUC 99246 requires the RTPA to designate an entity other than itself to conduct a performance audit of the activities of it and the operators to which it allocates TDA funds on a triennial basis. Per PUC 99248, no operator is eligible to receive an allocation of LTF funds until the reports have been completed. CCR 6662.5 stipulates that the performance audits must be submitted by July 1 of the year following the end of the fiscal year. For the previous audit cycle, all three Triennial Performance Audits were dated September 2020. This was more than a year after the deadline of July 1, 2019 for the LTC and ESAAA audits (which covered FY 2015/16 through FY 2017/18), and two months after the July 1, 2020 deadline for the ESTA audit (which covered FY 2016/17 through FY 2018/19). During this time, the LTC continued to provide TDA funding to the ESAAA, despite the Triennial Performance Audit not being submitted.

Because all three audits are not on the same schedule, it is important the LTC ensure the audits are completed and submitted according to their individual timeframes. Upon completion of the LTC and ESAAA audits prior to June 30, 2022, the LTC would certify the operator audit and submit its audit to Caltrans. In 2023, the LTC will certify the on-time completion of the ESTA audit to Caltrans.

Progress: All three audits completed during the prior cycle were completed prior to the June 30 deadline.

Status: Implemented.

4. Ensure documentation of the submittal of the RTPA's triennial performance audit and certification of the operator's triennial performance audit is maintained and can be provided during the next triennial performance audit.

Discussion: PUC 99246 requires each RTPA to submit its completed performance audit to Caltrans and certify in writing it has completed the audits of any operator to which it allocates TDA funding. During the prior audit process, the LTC could not provide documentation of this submittal from its previous triennial performance audit. While this information can be submitted via an email only, the prior auditor recommended creating a submittal letter that could be sent via email along with the electronic version of the RTPA audit. The prior auditor noted the sent email should be saved (with attachments) on a network drive that can be readily accessed in preparation for the next triennial performance audit. Avoid saving the email in the sender's email account and nowhere else.



Progress: The LTC provided documentation that it had emailed its prior Triennial Performance Audit to Caltrans, but did not certify the audit of ESTA the following year after it had been completed. Both audits were completed on time.

Status: Partially implemented.

5. The LTC should adopt criteria for the evaluation of claims under Article 4.5.

Discussion: PUC 99275.5 requires the RTPA to adopt criteria, rules, and regulations for the evaluation of claims filed under Article 4.5. The prior auditor found the LTC does not have clearly defined criteria, rules, and regulations for the evaluation of Article 4.5 claims. There are no defined performance criteria for services provided under ESAAA. The prior auditor recommended LTC adopt criteria for the evaluation of claims under Article 4.5 that are in compliance with PUC 99275.5. Doing so would ensure the current process for awarding CTSA funding is in compliance with the RTPA's own guidance.

Progress: Since ESAAA no longer claims TDA funding, there are no Article 4.5 claimants, nor has there been interest from other organizations in claiming these funds. As such, there is no need at present to develop evaluation criteria. Should there be interest in claiming Article 4.5 funds, LTC should consider developing criteria for the evaluation of such claims.

Status: No longer relevant.

6. The LTC must develop and adopt appropriate performance criteria for the ESAAA, to be evaluated as part of the TDA claims process.

Discussion: PUC 99275.5 requires the RTPA to determine the cost effectiveness of the transit service provided by adopting appropriate performance criteria for operators receiving Article 4.5 funding. The prior auditor recommended LTC work with the ESAAA to determine one or more appropriate performance criteria. These could include the percentage of Transportation funding provided through TDA funds, a percentage increase in the number of trip/bus passes provided, or other such metric. The criteria would need to be adopted by the RTPA by resolution and reviewed annually as part of the ESAAA's TDA claim. Thresholds should be established in such a manner to offer a meaningful measure of productivity but not to the point they cannot be reasonably met, as compliance with the criteria is a required element of the TDA claim evaluation.

Progress: ESAAA no longer receives TDA funding.

Status: No longer relevant.

7. Update the calculation methodology for the second (average) STA efficiency test and use the smallest percentage if funds must be restricted for capital purposes.

Discussion: PUC 99314.6 requires transit operators to meet one of two efficiency criteria in order to use STA funding for operational expenses. The measure of efficiency is based on change in cost



per vehicle service hour (VSH). If an operator does not meet either test of efficiency, then the amount of STA funding available for operating expenses is reduced by the lowest percentage it exceeded the amount necessary to meet the standard. The prior auditor found the first test was being conducted correctly, but recommended LTC update its calculation methodology for the second (average) STA efficiency test to reflect the appropriate time period. It noted the LTC might wish to provide a spreadsheet for ESTA to use so that eligibility for use of STA for operating purposes is clearly demonstrated, and the percentages clearly identified if funds must be restricted for capital.

Progress: LTC provides an STA worksheet for calculating eligibility as part of the TDA claims process, which included the updated calculation. However, eligibility requirements were waived during the audit period.

Status: Implemented.

8. [Reevaluate the LTC's claims process and forms, including how the provided data is reviewed and eligibility for funding is determined.](#)

Discussion: Under the TDA, each RTPA has the responsibility of developing an effective claims process for the funds it allocates. In addition, it is the responsibility of the RTPA to ensure claims are only paid to eligible claimants (those in compliance with the TDA). It is the responsibility of the RTPA to annually identify, analyze, and recommend potential productivity improvements (PUC 99244).

The prior auditor recommended LTC review its TDA claim forms and processes, and update them as necessary to ensure they provide all information needed for the RTPA to make a clear determination of compliance with the TDA. This may require adding or updating forms, adjusting the productivity review process, and/or working with the operators to ensure the forms are completed fully. LTC staff should also ensure prior audit recommendations are from the most current triennial performance audit for which recommendations are available and that responses either indicate completion (which can be carried over from year to year) or progress toward implementation. LTC should note which recommendations have been implemented and follow up to confirm this status. In addition, either the claim forms or the annual fiscal audit should also document compliance with required performance criteria, whether farebox recovery ratio (ESTA) or something else (ESAAA).

Progress: The LTC included a page to its TDA claims that requires claimants to discuss recommendations and findings.

Status: Implemented.



Chapter 6 | Functional Review

A functional review of the Inyo County Local Transportation Commission determines the extent and efficiency of the following functional activities:

- Administration and Management;
- Transportation Planning and Regional Coordination;
- Claimant Relationships and Oversight;
- Marketing and Transportation Alternatives; and
- Grant Applications and Management.

Administration and Management

The Inyo County Local Transportation Commission (LTC) is a six-member commission that serves as the Regional Transportation Planning Agency (RTPA) for Inyo County. The LTC is comprised of two members each from the Inyo County Board of Supervisors and the Bishop City Council, while the remaining two seats are Board- and Council-appointed at-large representatives. The Inyo County Public Works Director serves as the Executive Director of the LTC. The Commission is discussed further in Chapter 3.

Commission meetings are held in person on the third Wednesday of the month. A virtual option is available for members of the public as well as Commissioners if the circumstances meet AB 361 criteria. Most members attend most meetings, and there has not been a problem achieving a quorum.

The Commission has taken an interest in project readiness and development. STIP funding has been negative since the early 2000s due to major projects, which has limited the development of new initiatives. There is a strong interest in having projects ready for future funding opportunities to ensure prioritization. While the City of Bishop has some projects prepared, Inyo County currently does not.

Management monitors the progress and financial status of ongoing programs through Overall Work Program reports, which are prepared quarterly. Internal financial tracking documents are updated monthly to ensure progress is on track. LTC staff also participate in weekly Inyo County Public Works meetings regarding ongoing projects.

The LTC has established clear, comprehensive, and realistic goals and objectives for internal functions, regional coordination, grant applications, operator performance, and transportation alternatives through its annual Overall Work Plan (OWP) and Regional Transportation Plan. Transit operator performance is reported to the Commission frequently, though only evaluated during the annual TDA claims process. Active transportation is a focus of the LTC, which increased its LTF bicycle and pedestrian set-aside to the maximum of five percent. The OWP describes in detail milestones, deliverables, and schedules to be accomplished during the fiscal year. Progress toward goals is evaluated through OWP progress and success of active transportation proposals.

The LTC has a positive and effective relationship with its single operator. TDA claims are processed in a timely manner. Claims are approved by the Commission in June, with disbursements made monthly for LTF and quarterly for STA funding.



At the time of the site visit, the LTC was modest in size with just two staff. A third full-time LTC staff member was expected to be added in late April 2025. The new Planning Technician would function as an assistant to the Transportation Planner. The position will free up the Transportation Planner from some current duties, serve as the LTC Secretary, and support current Transportation Planner functions. Staff receive regular training in the form of funding and grant program workshops and annual workplace training. Staff receive annual employee evaluations and a comprehensive County benefits package.

Transportation Planning and Regional Coordination

The LTC is responsible for preparing a Regional Transportation Plan (RTP) for Inyo County. The RTP is a long-range (20-year) transportation plan providing a coordinated vision for regional transportation investments. As the RTPA, the Inyo County Local Transportation Commission is required to prepare and adopt an updated RTP every four years. It must be consistent with other planning guidance in the region. The current RTP was adopted on November 29, 2023. It includes the three required elements (Policy Element, Action Element, Financial Element). The Policy Element includes eight individual goals. The LTC typically contracts out for the RTP update, including hearing and public outreach. The next update is scheduled for 2027. Additional details regarding the LTC's regional planning activities are provided in Chapter 3.

Staff actively encourage participation from transportation providers, various agencies, tribal representatives, and transit users in the monthly LTC meetings, which serve as a forum for public comments and updates. Additionally, staff are engaged in planning and grant development initiatives in collaboration with the Eastern Sierra Council of Governments (ESCOG), support electric vehicle (EV) infrastructure development efforts, and contribute to transportation planning in partnership with local tribal governments.

Claimant Relationships and Oversight

The Inyo County Board of Supervisors does not currently have a productivity committee. However, it conducts regular monitoring of transit operator performance through regular meetings and monthly reports from ESTA's Executive Director, with the Commission serving as the productivity team that reviews the annual TDA claim. Monthly meetings are a regular forum for Commissioners to share expectations with the operator. In general, operator efforts to implement suggestions and recommendations are reasonable and effective. LTC conducts its annually unmet transit needs process between February and April.

The prior Triennial Performance Audit included a number of compliance recommendations for the Eastern Sierra Area Agency on Aging (ESAAA), which claimed LTF Article 4.5 funds. At least two prior audits found that the ESAAA could not comply with TDA requirements regarding productivity and efficiency standards. After the completion of the 2022 Triennial Performance Audit, LTC informed ESAAA that it must file a fiscal audit or not receive funding. The ESAAA opted to return the FY 2020/21 funds it had already received and opt out of future funding cycles.

The LTC makes technical and managerial assistance available to operators, and is in regular communication with claimants. Technical support is provided upon request, though the operator does not often ask for it. The LTC recently provided assistance with the SB 125 allocation.



Marketing and Transportation Alternatives

The LTC does not provide marketing on behalf of the transit operator. It does advertise and promote the links to the operators' information on its website. The operator develops its own strategic business plan that includes performance indicators, marketing plans, and customer perception surveys.

While the LTC does not develop programs to promote the use of alternative transportation, it was recently awarded a \$7.6 million Active Transportation Program grant. This was one of only 13 projects selected in California. The grant will support an Active Transportation Project in southeast Inyo County (Tecopa) that is most rural and disadvantaged with no active transportation infrastructure. The project will increase safety for local residents that rely on walking and biking, as well as tourists visiting the sand dunes. The project aims to reduce conflicts points between fast-moving cars and vulnerable users. The implementation period is set for FY 2025/26 to FY 2028/29.

Grant Applications and Management

The LTC may review grant applications by the operator. It provides technical assistance with financial data upon request. The LTC and ESTA typically applies for grants such as FTA Section 5310, FTA Section 5311, SB 125, LCTOP, SGR, and FTA Section 5339. The RTPA monitors expenditures for LCTOP grants. The ESTA's Executive Director administers and executes all ESTA grant agreements.

The LTC is proud of its recent track record of winning grants, which are used to benefit the whole region. At the time of the site visit, it was waiting to hear back regarding a Caltrans Sustainable Transportation Planning grant for evacuation routes.



This page intentionally blank.



Chapter 7 | Findings and Recommendations

Conclusions

With three exceptions, we find the Inyo County Local Transportation Commission, functioning as the RTPA, to be in compliance with the requirements of the Transportation Development Act. In addition, the entity generally functions in an efficient, effective, and economical manner. The compliance finding and the recommendation for its resolution, as well as modest recommendations intended to improve the effectiveness of the organization as the RTPA, are detailed below.

Findings and Recommendations

Based on the current review, we submit the following TDA compliance findings:

1. The LTC did not complete its fiscal audits for FY 2021/22 and FY 2022/23 prior to the June 30 deadline.
2. The LTC's State Controller Report for FY 2023/24 was submitted after the January 31 deadline.
3. The LTC did not certify completion of the ETSA audit to Caltrans upon its completion in 2023.

The audit team has identified no functional findings.

In completing this Triennial Performance Audit, the auditors submit the following recommendations for the LTC's program. They are divided into two categories: TDA Program Compliance Recommendations and Functional Recommendations. TDA Program Compliance Recommendations are intended to assist in bringing the RTPA into compliance with the requirements and standards of the TDA, while Functional Recommendations address issues identified during the audit that are not specific to TDA compliance. Each finding is presented with the elements identified within the 2011 *Government Auditing Standards* as well as one or more recommendations.

Given there are no functional findings, only compliance findings and recommendations are presented below.

Compliance Finding 1: The LTC did not complete its fiscal audits for FY 2021/22 and FY 2022/23 prior to the June 30 deadline.

Criteria: CCR 6662 requires each RTPA to submit a fiscal audit to the State Controller within 12 months of the end of the fiscal year.

Condition: The LTC's FY 2021/22 fiscal audit was completed on March 19, 2024, nearly nine months after the June 30, 2023 deadline. The FY 2022/23 fiscal audit was completed on January 10, 2025, more than six months late. At the time of this report, the FY 2023/24 audit had yet to be completed, but was not yet late (due June 30, 2025).

Cause: LTC staff indicated that the County consistently runs behind on its audits, which impacts the completion of the LTC audit.



Effect: Failure to submit the audit on time can result in the RTPA being out of compliance with the TDA.

Recommendation: Work with the County Auditor to ensure the LTC’s fiscal audits can be completed by the June 30 deadline.

Recommended Action: The LTC should work with the County Auditor’s office to ensure it is aware of the TDA deadline of June 30.

Timeline: FY 2024/25.

Anticipated Cost: None.

Compliance Finding 2: The LTC’s State Controller Report for FY 2023/24 was submitted after the January 31 deadline.

Criteria: PUC 99243 requires RTPAs submit their Financial Transaction Reports to the State Controller within seven months of the end of the fiscal year. Reports are typically due by January 31, though this deadline may be extended to February 1 or 2 if January 31 falls on a weekend.

Condition: The LTC submitted its FY 2023/24 State Controller Report on February 18, 2025, more than two weeks after the January 31 deadline. State Controller Reports for prior years were submitted on time.

Cause: The cause of the late submittal is unknown. Late submittals may be the result of miscommunications (e.g., if the letters from the State Controller are not addressed to the correct person), extenuating circumstances (such as staffing changes), or the required data not being available (e.g., waiting for a completed audit).

Effect: Failure to submit the report on time can result in the RTPA being out of compliance with the TDA.

Recommendation: Ensure the RTPA’s State Controller Financial Transaction Reports are submitted prior to the stated deadline.

Recommended Action: The LTC should ensure the Financial Transaction Reports are submitted on time regardless of who is responsible for preparing them. Given prior reports were submitted on time, it is likely this is a one-time occurrence. If future reports continue to be submitted on time, no further action is required.

Timeline: FY 2024/25 State Controller Report.

Anticipated Cost: None.



Compliance Finding 3: The LTC did not certify completion of the ETSA audit to Caltrans upon its completion in 2023.

Criteria: PUC 99246 requires each RTPA to submit its completed performance audit to Caltrans and certify in writing it has completed the audits of any operator to which it allocates TDA funding.

Condition: The LTC provided documentation that it had emailed its prior Triennial Performance Audit to Caltrans, but did not certify the audit of ETA the following year after it had been completed. Both audits were completed on time.

Cause: The most likely cause is the RTPA and operator audits being completed during different years. This requires the LTC to report them separately.

Effect: Failure to ensure both audits are reported to Caltrans could result in the RTPA being out of compliance with the TDA.

Recommendation: Ensure the LTC certifies the completion of the ETA's Triennial Performance Audit to Caltrans upon its completion.

Recommended Action: Designate an individual to be responsible for certifying the ETA's audit and program a reminder into the RTPA's calendar to ensure this is completed.

Timeline: Upon completion of ETA's next Triennial Performance Audit in 2026.

Anticipated Cost: None.

Exhibit 7.1 Audit Recommendations

TDA Compliance Recommendations		Importance	Timeline
1	Work with the County Auditor to ensure the LTC's fiscal audits can be completed by the June 30 deadline.	Medium	FY 2024/25
2	Ensure the RTPA's State Controller Financial Transaction Reports are submitted prior to the stated deadline.	High	FY 2024/25
3	Ensure the LTC certifies the completion of the ETA's Triennial Performance Audit to Caltrans upon its completion.	High	FY 2025/26



This page intentionally blank.