



Butte County Association of Governments

TDA Triennial Performance Audit of the
Butte County Association of Governments
as the RTPA for FY 2021/22 - FY 2023/24

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Chapter 1 | Executive Summary

The Triennial Performance Audit of the Butte County Association of Governments (BCAG) 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 2024, the Butte County Association of Governments selected Moore & Associates, Inc., to prepare Triennial Performance Audits of itself as the RTPA and the two transit operators to which it allocates TDA funding. Moore & Associates 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 BCAG’s programs for the period:

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

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require we 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. We believe the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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 one exception, the Butte County Association of Governments adheres to Transportation Development Act (TDA) regulations in an efficient and effective manner:

1. The City of Gridley did not complete its TDA fiscal audit prior to the extended deadline during any year of the audit period.

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. Prepare STA efficiency calculations either as part of the TDA audit process or the TDA claims process.
Status: Implemented.
2. Work with the City of Gridley to undertake a short range transit plan to address the City’s transit “vision” across a five-year planning horizon.
Status: Implementation in progress.
3. Work with the City of Gridley to secure funding for a second (backup) wheelchair-accessible vehicle.
Status: Implementation in progress.

Goal Setting and Strategic Planning

The Butte County Association of Governments (BCAG) is the regional transportation planning agency for Butte County. BCAG was created as a Joint Powers Authority in 1969 by the County of Butte; the cities of Biggs, Chico, Gridley, and Oroville; and the Town of Paradise. In addition to serving as the Regional Transportation Planning Agency (RTPA) for Butte County, BCAG is its designated Metropolitan Planning Organization (MPO).

The primary regional planning document is the Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS). The RTP/SCS, updated every four years, is a long-range transportation plan providing a 20+-year vision for regional transportation investments. The current RTP/SCS was prepared with the assistance of consultants and adopted by the BCAG Board in December 2024. The 2024 RTP/SCS reflected the impact of the Camp Fire in 2018, which had not been included in the prior document (completed in 2020). The Policy Element and SCS chapter both incorporate impacts of the fire into regional land use and transportation planning. BCAG is also responsible for regional planning for a variety of topics in addition to transportation, including air quality, housing, and climate adaptation.

Findings and Recommendations

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

1. The City of Gridley did not complete its TDA fiscal audit prior to the extended deadline during any year of the audit period.

The audit team has identified one functional finding. While this finding is not a compliance finding, the auditors believe it is significant enough to be addressed within this review:

1. There has been discussion with the City of Gridley about consolidating its Feather Flyer service into the B-Line service (administered by BCAG).

In completing this Triennial Performance Audit, we submit the following recommendations for BCAG 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 City of Gridley to ensure it can complete its TDA fiscal audits within the established timeframe.	High	Ongoing
Functional Recommendations		Importance	Timeline
1	Work with the City of Gridley to determine its needs and interest in consolidating the Gridley Feather Flyer into the B-Line service.	High	FY 2025/26

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Chapter 2 | Audit Scope and Methodology

The Triennial Performance Audit (TPA) of Butte County Association of Governments (BCAG) 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 2024, BCAG selected Moore & Associates, Inc., to prepare Triennial Performance Audits of itself as the RTPA and the two transit operators to which it allocates funding. Moore & Associates is a consulting firm specializing in public transportation. Selection of Moore & Associates followed a competitive procurement process.

The Triennial Performance Audit is designed to be an independent and objective evaluation of Butte County Association of Governments as the designated RTPA for Butte 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 Auditing 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 BCAG 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 BCAG’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 BCAG as the RTPA included thorough review of documents relevant to the scope of the review, as well as information contained on BCAG’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 BCAG representatives on February 25, 2025. The audit team met with Andy Newsum (Executive Director), Julie Quinn (Chief Fiscal Officer), and Ivan Garcia (Programming 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.

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Chapter 3 | Overview of BCAG

The Butte County Association of Governments (BCAG) is the regional transportation planning agency for Butte County. BCAG was created as a Joint Powers Authority in 1969 by the County of Butte; the cities of Biggs, Chico, Gridley, and Oroville; and the Town of Paradise.

Roles

In addition to serving as the Regional Transportation Planning Agency (RTPA) for Butte County, BCAG is its designated Metropolitan Planning Organization (MPO). BCAG's role in the community and region is diverse, providing leadership and/or support for the following activities:

- Butte Regional Transit Policy Board and Operator,
- Area-Wide Clearinghouse,
- Census Affiliate Data Center, and
- Butte Regional Transportation Corporation.

As the MPO and RTPA, BCAG is responsible for developing regional transportation planning and programming documents. Specific planning and programming responsibilities include:

- Annual Overall Work Program (OWP) and Budget,
- Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS),
- Regional Transportation Improvement Program (RTIP),
- Administration of the Transportation Development Act's Local Transportation Fund (LTF) and State Transit Assistance (STA) fund,
- Federal Transportation Improvement Program (FTIP),
- Air Quality Conformity Determinations,
- Regional Housing Needs Plan (RHNP),
- Regional transportation studies,
- Administration and operation of Butte Regional Transit,
- Capital projects development and implementation, and
- Environmental mitigation.

BCAG is also a signatory of the North State Super Region, which is a coalition of Northern California regional transportation planning agencies formed through a Memorandum of Agreement (MOA) in 2010. The group meets quarterly on transportation planning issues to ensure there is cooperation and consensus on regional issues.

BCAG Board of Directors

BCAG is governed by a 10-member Board of Directors comprised of one representative each from the five county districts and the five incorporated municipalities located within the political boundaries of Butte County (Biggs, Chico, Gridley, Oroville, and Paradise). The Board meets on the fourth Thursday of each month at 4:00 p.m., with November and December combined and held the second Thursday after Thanksgiving. All meetings are open to the public and virtually accessible via Zoom. Regular meetings are

held at BCAG administrative offices, which are accessible by public transit via a single stop Board Run Shuttle service leaving the Chico Transit Center at 8:35 a.m. on Board meetings days.

Board members serving during the audit period included:

- Bill Connelly, District 1 Supervisor (2021-2023),
- Debra Lucero, District 2 Supervisor (2021-2022),
- Peter Durfee, District 2 Supervisor (2023),
- Tami Ritter, District 3 Supervisor (2021-2023),
- Tod Kimmelshue, District 4 Supervisor (2021-2023),
- Doug Teeter, District 5 Supervisor (2021-2023),
- John Busch, Councilmember, City of Biggs (2021),
- Chuck Nuchols, Councilmember, City of Biggs (2022-2023),
- Kasey Reynolds, Vice Mayor, City of Chico (2021-2023),
- J. Angel Calderon, Councilmember, City of Gridley (2021-2023),
- Chuck Reynolds, Vice Mayor, City of Oroville (2021-2022),
- David Pittman, Mayor, City of Oroville (2023)
- Jody Jones, Councilmember, Town of Paradise (2021-2022), and
- Rose Tryon, Vice Mayor, Town of Paradise (2023).

The Board has an Executive Committee for the purpose of evaluating the Executive Director. There are also three advisory bodies that include representation from local jurisdictions as well as citizen participants. These are the Transportation Advisory Committee, the Transportation Administrative Oversight Committee, and the Social Services Transportation Advisory Council.

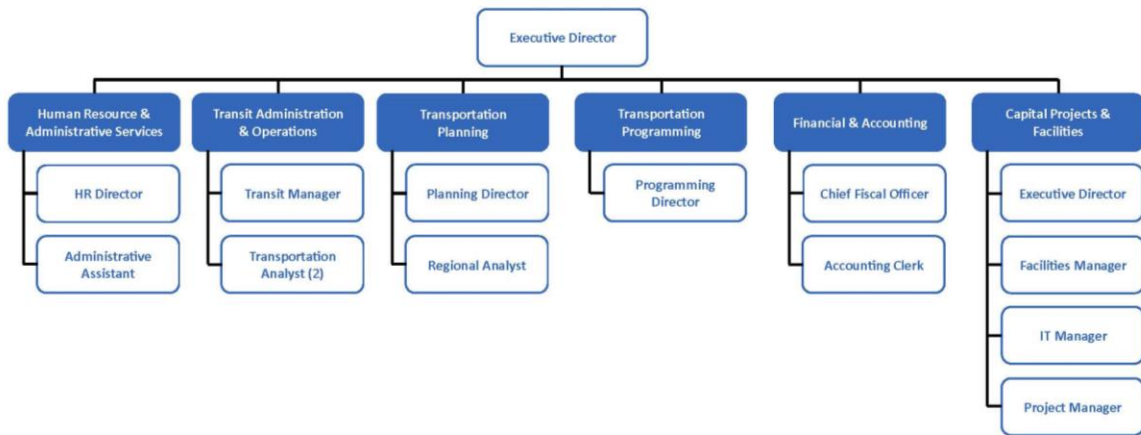
- The Transportation Advisory Committee (TAC) includes representatives from each of the local jurisdictions' public works and planning departments; City, Town, and County technical staff; appointed citizen representatives with a technical interest in the BCAG planning process; and representatives from the Air District, Caltrans, and other relevant agencies. The TAC meets on the first Thursday of the month as needed to provide analysis on transportation project/program development.
- The Transportation Administrative Oversight Committee (TAOC) is made up of administration, public works, and other staff representatives from each jurisdiction. It reviews budgets, vehicle replacement needs, policy issues, and other considerations for Butte Regional Transit (BRT).
- The Social Services Transportation Advisory Council (SSTAC) was created to meet the requirements of the TDA. Representatives include transit providers; social service agencies; organizations serving youth, seniors, low-income residents, and/or the homeless; and citizens representing any of these groups. The SSTAC meets as needed to review potential unmet transit needs and advise the BCAG Board.

The RTPA does not currently have sufficient staff to accomplish its functions in an efficient and effective manner. At the time of the site visit the Executive Director noted there have been more capital-type projects that are being covered by the current staff, but the work is slow given other responsibilities. BCAG plans to add a new project management position in FY 2025/26, which is expected to manage these types

of project more effectively. This will also enable the Executive Director to back away from this role for some of these projects.

There are no concerns regarding turnover, and most employees consider BCAG a solid place to work. Staff receive annual performance evaluations, and are eligible for a standard package of benefits. Regular training can be a challenge to accomplish with a limited number of staff covering a wide range of tasks, and individual responsibilities that change as needs change. An organizational chart is provided in Exhibit 3.1.

Exhibit 3.1 BCAG Organizational Chart



Goal setting and strategic planning

The primary regional planning document is the Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS). The RTP/SCS, updated every four years, is a long-range transportation plan providing a 20+-year vision for regional transportation investments. The current RTP/SCS was prepared with the assistance of consultants and adopted by the BCAG Board in December 2024. The 2024 RTP/SCS incorporated impacts from recent wildfires and the COVID-19 pandemic. The Policy Element and SCS chapter both incorporate impacts of the fire into regional land use and transportation planning.

Extensive outreach was conducted in support of the RTP/SCS, beginning in 2022 and continuing through 2024. This began with an update of BCAG’s Public Participation Plan and preparation of a Sustainable Communities Outreach Plan. Information and regular updates on the project were provided via the 2024 RTP/SCS Update project webpage. Other engagement activities included:

- BCAG Bulletin quarterly e-newsletter,
- Two public workshops,
- SCS Community Survey (available in English, Hmong, and Spanish),
- Community Regional Travel Survey (available in English, Hmong, and Spanish),
- Employer Regional Travel Survey, and
- Participation in community events throughout the county.

During the RTP/SCS development process, BCAG reached out to neighboring congestion management agencies, transportation agencies, and transportation commissions. These included the Sacramento Council of Governments (SACOG); Shasta Regional Transportation Agency (SRTA); Tehama, Glenn, and Colusa County Transportation Commissions; Yuba Sutter Transit; Redding Area Bus Authority; and Glenn Ride. BCAG also consulted with local Native American tribal governments, including the Mechoopda Indian Tribe of the Chico Rancheria.

The BCAG Board of Directors and advisory committees were engaged throughout the RTP/SCS development and received regular updates and opportunities to comment. Public hearings were held as part of two regularly scheduled Board meetings. Board meetings that included agenda items on the 2024 RTP/SCS Update included:

- February 23, 2023 (Regional Travel Survey),
- April 27, 2023 (Regional Travel Survey and Regional Growth Forecast Update),
- August 24, 2023 (2024 SCS Update),
- March 28, 2024 (Draft RTP Project List and SCS Update),
- May 23, 2024 (2024 SCS Update),
- August 22, 2024 (RTP/SCS Update),
- September 26, 2024 (Presentation of Draft 2024 RTP/SCS Update and SEIR; Public Hearing #1); and
- December 12, 2024 (2024 RTP/SCS and SEIR Adoption; Public Hearing #2).

The 2024 RTP/SCS includes the four required elements (Policy Element, Action Element, Financial Element, and Sustainable Communities Strategy). The Policy Element includes individual goals, objectives, and policies/actions for each of 16 policy areas. The Action Element includes separate chapters for analysis and conclusions. Development of the Sustainable Communities Strategy required a significant effort, far more than the update of the Regional Transportation Plan.

The 2024 RTP/SCS also includes a robust analysis of system performance measures related to federal and state performance management targets with respect to safety (fatalities and injuries), infrastructure conditions (pavement and bridges), system performance (freight movement, congestion, and reliability), Transit Asset Management, and the Public Transportation Agency Safety Plan. This analysis also includes an update of performance regarding RTP/SCS performance measures.

The 2024 RTP/SCS also utilized the Regional Travel Demand Forecasting (TDF) model, which was calibrated and validated to 2022 base year data using the land use allocation model. This model includes an adjustment to account for the loss and rebuilding of housing units and other structures associated with the Camp Fire.

The 2024 RTP/SCS sets forth goals, objectives, and supporting policies/actions in 16 categories. Each policy/action specifies which agencies or jurisdictions have implementation responsibility. A summary of these goals and objectives is provided in Exhibit 3.2.

Exhibit 3.2 2024 RTP/SCS Goals and Objectives

Goal	Objective(s)
1. Highways, Streets, and Roads	
A safe, efficient, and equitable regional road system that accommodates the demand for movement of people and goods.	Strive to improve safety and operations of the local and state highway system.
	Identify and prioritize improvements to the regional road system.
2. Bus Transit Network and Service	
An efficient, effective, coordinated regional transit system that increases mobility for urban and rural populations, including those in disadvantaged areas of the region.	Meet all transit needs that are reasonable to meet.
	Make improvements to the regional public transit system to improve service, increase ridership, and achieve a zero-emission fleet.
	Promote community participation and education in transit planning and operations.
	Maintain a safe and reliable transit system.
3. Rail Transit Network and Service	
A rail system that provides safe and reliable service for people and goods.	Maintain and expand passenger service through Butte County.
4. Active Transportation	
A connected regional transportation system for bicyclists and pedestrians.	Work with local agencies to implement active transportation projects including those that connect to and improve access to transit facilities.
	Assist local jurisdictions in pursuing grant funding.
	Focus on urban infrastructure improvements that contribute to interconnectivity and safety for active transportation users.
	Work with local agencies and the state to address crime and safety issues.
	Facilitate regional connectivity to improve inter-regional active transportation utilization.
5. Goods Movement	
A transportation system that enables safe movement of goods in and through Butte County.	Provide an adequate regional road system for goods movement.
6. Aeronautics	
A fully functional and integrated air service and airport system complementary to the countywide transportation system.	Maintain daily commercial airline service to the Bay Area.
	Work with local agencies to ensure compatible land uses around existing airports to reduce noise conflicts.
	Ensure Airport Master Plans are updated and revised as necessary and required.
7. Transportation Financing	
RTP project and strategy implementation is supported by effective financing strategies.	Develop and adopt policies that will provide adequate funding resources for all transportation modes and strategies.
	Work with cities, towns, and the County on development of a regional road network fee program.
8. Energy	
Nonrenewable energy resources for transportation are reduced.	Increase public transit, carpooling/vanpooling, and active transportation modes.
9. Air Quality	
Air quality standards set by the Environmental Protection Agency (EPA) and the California Air Resources Board are achieved.	Coordinate transportation planning with air quality planning at the technical and policy level.
	Implement transportation requirements established by Assembly Bill (AB) 32.

Goal	Objective(s)
10. Quality of Travel and Livability	
A safe, balanced, efficient, and equitable regional transportation system that serves the needs of all community members in the region.	Assist in efforts which enhance mobility for the region. The system should be optimized to maximize its productivity and provide convenient travel options for people and goods. The system should reduce both the time it takes to travel as well as the total costs of travel.
	Assist in efforts which enhance reliability for the region. The system should be reliable so travelers can expect relatively consistent travel times from day to day for the same trip by mode(s).
	Assist in preserving the transportation system and safety. The public's investment in transportation should be protected by maintaining the system to preserve it and ensure a safe system.
11. Land Use	
Economical, long-term solutions to transportation problems are achieved by encouraging community designs supportive of walking, transit, and bicycling.	Implement innovative land use policies that connect the community and make it easier to travel without a vehicle.
	Plan future roads to accommodate land uses at a regional level.
	Encourage and support development of complete streets and active transportation projects that are pedestrian friendly and encourage bicycle trips and the use of public transit.
	Preserve productive farmland and land that provides habitat for rare, endangered, or threatened species.
	Ensure goals and policies are consistent at both the regional and local levels.
12. Sustainability	
Sustainable Community Strategies are incorporated into the regional transportation planning process to reduce greenhouse gas emissions, improve social equity, and cultivate a healthy environment and prosperous economy.	Work towards a transportation system that is designed to provide an equitable level of transportation services for all populations.
	Work towards a transportation system that complements and fosters efficient development patterns and that optimizes travel.
	Make transportation decisions and investments that support a prosperous economy and ensure that the transportation system plays a significant role in raising the region's standard of living.
13. Housing	
BCAG supports and collaborates on proactive efforts to address regional housing needs.	Coordinate with cities, town, and county on redevelopment of Regional Housing Needs Plan (RHNP) updates.
	Work with cities, town, and county to implement BCAG's RHNP.
	Work with cities, town, and county on efforts to develop housing in locations where jobs, services, amenities, and transit and active transportation infrastructure already exist.
14. Emergency Preparedness	
BCAG supports and collaborates on proactive emergency planning and projects. Projects that increase emergency readiness and preparedness include upgrading and maintaining roadways, public transit, or facilities that support emergency situations.	Work with the cities, town, and county on development of a regional road network that facilitates emergency response and emergency evacuations.
	Actively assist local jurisdictions with pursuit of grant funding for projects that enhance emergency preparedness.
15. Outreach and Coordination	
BCAG provides a forum for participation and cooperation in transportation planning and facilitates relationships between stakeholders that transcend jurisdictional boundaries to address regional transportation issues.	Assist jurisdictions in local transportation planning.
	Promote consistency among all levels of local transportation planning.
	Promote community member participation and education in transportation planning.

Goal	Objective(s)
16. Intelligent Transportation Systems	
ITS technologies are integrated in the planning and programming process.	Maintain the North Valley Regional ITS Architecture Plan.
	Apply Transportation Systems Management (TSM) strategies to projects where appropriate.

Planning for the next RTP/SCS Update is expected to begin within the FY 2025/26 Overall Work Program (OWP).

BCAG is responsible for regional planning for a variety of topics in addition to transportation, including air quality, housing, and climate adaptation. Regional plans completed during the audit period include the following:

- North Valley Passenger Rail Strategic Plan (2024)
- B-Line Routing Study (2023)
- Butte Zero Emission Vehicle Readiness Plan (2023)
- Zero-Emission Bus Rollout Plan (2023)
- Chico to Sacramento Inter-City Transit Strategic Plan (2022)

BCAG is also in the process of updating its Coordinated Public Transit – Human Services Transportation Plan, which is expected to be completed in 2025. This plan was last updated in 2008. BCAG also has several capital projects under development, including the Paradise Transit Center (which will be completed in FY 2024/25), implementation of the zero-emission bus plan, and North Valley Passenger Rail.

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Chapter 4 | Program Compliance

This section examines the Butte County Association of Governments’ 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 BCAG staff as well as an inspection of relevant documents, including the fiscal audits for each year of the triennium. Also reviewed were planning documents, Board actions, and other related documentation.

With one exception, BCAG adheres to Transportation Development Act (TDA) regulations in an efficient and effective manner:

1. The City of Gridley did not complete its TDA fiscal audit prior to the extended deadline during any year of the audit period.

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 four 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	Not applicable	At present, BCAG does not allocate funding under Article 3. It expects to begin doing so in FY 2025/26 and will develop procedures for claims.
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	SSTAC meetings: <ul style="list-style-type: none"> • May 2, 2022 • January 9, 2023 • January 22, 2024 UTN public hearings: <ul style="list-style-type: none"> • March 24, 2022 • December 9, 2022 • December 7, 2023
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	There is a process for assessing productivity improvements in the existing TDA Workbook. BCAG staff review BRT productivity regularly, though not necessarily as part of the TDA claims process. BCAG provides general oversight of the City of Gridley’s program. In Attachment A of the TDA claims, operators must state that they conform with the productivity improvement requirements.
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	Finding	BRT: FY 2021/22: February 13, 2023 FY 2022/23: March 1, 2024 FY 2023/24: February 21, 2025 Gridley: FY 2021/22: June 21, 2024 FY 2022/23: February 19, 2025 FY 2023/24: <i>Pending</i>
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	In compliance	FY 2021/22: February 13, 2023 FY 2022/23: March 1, 2024 FY 2023/24: February 21, 2025
The RTPA has submitted within seven months after the end of the fiscal year an annual financial transactions report to the state controller.	CCR 6660	In compliance	FY 2021/22: January 9, 2023 FY 2022/23: January 16, 2024 FY 2023/24: January 15, 2025

Compliance Element	Reference	Compliance	Comments
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 May 2022. Moore & Associates was also engaged to prepare the current Triennial Performance Audits, which will be completed in April 2025.
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)	In compliance	Letter to Caltrans dated June 24, 2022.
For Article 8(c) claimants, the RTPA may adopt performance criteria, local match requirements, or fare recovery ratios. In such cases, the rules and regulations of the RTPA will apply.	PUC 99405	Not applicable	
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	In compliance	Effective FY 2022/23, BCAG established a blended farebox ratio of 15.6 percent, rather than separate farebox recovery ratios for each mode.
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	BCAG does not currently allocate any funding under Article 4.5.
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	

Compliance Element	Reference	Compliance	Comments
Transit operators must meet one of two efficiency standards in order to use their full allocation of state transit assistance funds for operating purposes. If an operator does not meet either efficiency standard, the portion of the allocation that the operator may use for operations shall be the total allocation to the operator reduced by the lowest percentage by which the operator's total operating cost per revenue vehicle hour exceeded the target amount necessary to meet the applicable efficiency standard. The remaining portion of the operator's allocation shall be used only for capital purposes.	PUC 99314.6	In compliance	This requirement was waived during the audit period under AB 90, AB 149, and SB 125. The process for conducting the efficiency tests is included in the TDA Workbook.
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>SSTAC meetings:</p> <ul style="list-style-type: none"> • May 2, 2022 • January 9, 2023 • January 22, 2024 <p>UTN public hearings:</p> <ul style="list-style-type: none"> • March 24, 2022 • December 9, 2022 • December 7, 2023

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Chapter 5 | Prior Recommendations

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

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

1. Prepare STA efficiency calculation either as part of the TDA audit process or the TDA claims process.

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. 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.

At the time of the prior audit, the BCAG TDA claim forms included an element in the Statement of Conformance (Attachment A), signed by the operators, stating the operator meets the STA efficiency standards. However, it did not appear BCAG verified this statement with the operators, nor did it ask the operators to show how they meet this requirement. While the TDA claim form did not identify whether STA funding is being used for operational or capital purposes, this information was reflected on the annual TDA project expenditure plan.

The prior auditor recommended BCAG conduct the STA efficiency tests annually as part of the TDA claims process or the TDA fiscal audit. It should ensure the tests have been conducted and the operator is eligible prior to authorizing any claims for STA operating funds. If the operator is not eligible to claim all available STA funds for operating, BCAG must then determine how much STA funding must be reserved for capital purposes only.

Since the efficiency tests use audited data, is it reasonable to include the calculation as part of the TDA fiscal audit alongside the farebox recovery ratio calculation. If included within the fiscal audit, the auditor must be familiar with relevant portions of the TDA legislation, including PUC 99314.6, AB 90, and AB 149. If included as part of the TDA claims process, BCAG may need to add a worksheet to the claim form (in addition to the Statement of Conformance) showing compliance with one or both tests was calculated.

Progress: While the efficiency tests were waived during the audit period, BCAG included instructions as to their use and calculation within the update of its TDA Workbook.

Status: Implemented.

2. Work with the City of Gridley to undertake a short range transit plan to address the City’s transit “vision” across a five-year planning horizon.

Discussion: This recommendation was carried forward from a previous audit. It was not implemented during the prior audit period for a number of reasons, including significant staff turnover in the City of Gridley’s Finance department. At that time, the City was looking at potentially significant growth over the next few years, including several low-income and senior housing developments and a sports complex (which was unlikely to have sufficient parking for large events). The City expressed a need for a practical transit “vision” that assessed the transit service and looked at potential enhancements across the next five years. The service delivery mode could only expand so much before it would have to start turning away riders due to reaching capacity. A short range transit plan (SRTP) would enable the City to prepare for whatever comes next before it reached a tipping point.

The prior auditor recommended BCAG, in partnership with the City of Gridley, retain a qualified consultant to provide an objective evaluation of the Gridley Feather Flyer program and offer recommendations for future program development based on anticipated population growth, land-use, and other considerations.

Progress: During the audit period, BCAG and the City of Gridley began discussions about consolidating the Gridley Feather Flyer into the B-Line service. It was not feasible to hire a consultant or conduct short-range planning if the ultimate result was to eliminate the Flyer as a separate service. As such, while informal discussions took place between the two entities, no formal short range transit plan was prepared.

If the service is consolidated, planning for the Flyer would be conducted as part of regional B-Line planning. If the City chooses to retain operation of its service, the City should take the lead in preparing a short-range plan to more effectively plan for future services.

Status: Implementation in progress.

3. Work with the City of Gridley to secure funding for a second (backup) wheelchair-accessible vehicle.

Discussion: As the RTPA, BCAG allocates TDA funding for transit operators within its jurisdiction, which can include capital purchases. The City of Gridley’s transit program is operated using one wheelchair-accessible transit vehicle. Whenever possible, preventive maintenance is conducted outside of regular service hours so as not to impact service delivery. However, when the vehicle must be out of service during regular service hours, a City pool car is used to provide rides. Since the pool car is not wheelchair-accessible, no rides for customers needing a wheelchair-accessible vehicle can be provided when a pool car is in use.

The prior auditor, given the anticipated growth in the community, noted it was likely the City would need access to a second vehicle, either for regular service or to supplement service for

specific activities. The need for this vehicle was expected to be addressed as part of the City's SRTP.

The prior auditor recommended BCAG work with the City of Gridley to identify funding for a second (backup) wheelchair-accessible transit vehicle. The type of vehicle would depend on the need and future demand identified in the SRTP.

The prior auditor also noted, since Gridley does not currently receive federal money, funding for the vehicle would likely need to come from state or local sources so as not to place the additional burden of federal grant reporting on the City's limited Finance staff.

Progress: The City and BCAG have identified funding (using TDA capital reserves) for a wheelchair-accessible transit vehicle. The City will be placing an order soon and expects delivery in approximately eight months. Should the service no longer operate under the management of the City and be consolidated under BRT, the vehicle title would be transferred to BCAG at that time and the vehicle incorporated into the BRT fleet.

Status: Implementation in progress.

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Chapter 6 | Functional Review

A functional review of the Butte County Association of Governments 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; and

Administration and Management

BCAG provides an appropriate level of administration for regional transportation planning activities. The TDA claim process is initiated within a timely manner with all of the jurisdictions. BCAG's ability to complete that process depends on the ability of the local jurisdiction's staff to provide the requested information. Once a claim is received, it is processed during the following month and funds are paid out as monies are received. TDA claims may not be filed if the required fiscal audit reports have not been completed.

The status of ongoing programs and projects is monitored by tracking the work products and activities specialized in each work element. Financial status for each appears in monthly reports in terms of percentage of funds spent per work element.

BCAG holds monthly and quarterly meetings with member jurisdictions through its Planning Directors Group (PDG) and Technical Advisory Committee (TAC). It communicates directly with staff at each agency and has received no indication that they are not satisfied with its efficiency and effectiveness.

BCAG establishes comprehensive and realistic goals for the majority of its functions annually as part of the Overall Work Program. Each work element includes a set of affiliated goals. These goals are assessed frequently as what is realistic to accomplish is often dependent upon evolving workloads and relationships with consultants or other staff, which can be a dynamic process.

BCAG's strategy regarding grants has been to apply to those that are a good fit for the needs of BCAG and BRT. In recent years, the focus has been primarily on capital grants to support public transportation, infrastructure upgrades, purchase zero-emission buses, and conduct transportation planning studies. The agency has a good grant writer and has been very successful in receiving funding. Managing these grants, however, has been a challenge with the current staff. This will likely mean BCAG will not submit some of the applications it would otherwise pursue in order to get caught up. The agency intends to hire a project management staffer in FY 2025/26 to manage some of these grants, which will enable the Executive Director to step back from doing some of this work.

The BCAG Board of Directors meets on the fourth Thursday of each month at 9:00 a.m. Meetings are held in person with a virtual option. Six Board members must be present in person to achieve a quorum. Most Board member attend most meetings. Only once has there been an issue with not having a quorum.

With BCAG serving as the RTPA as well as the administrator of Butte Regional Transit, the BCAG Board is aware of much of what is happening around transit in terms of funding and other opportunities. As a result, during the audit period the Board has remained interested in public transportation and transit because so many of the programs and funding BCAG utilizes have been tied to public transportation. Many of the Board members are hearing some of the same things from BCAG that they are hearing from their own jurisdictions in terms of serving disadvantaged communities, serving seniors and persons with disabilities, and equitable transportation investments.

Transportation Planning and Regional Coordination

BCAG completed an update of its Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) in December 2024 (detailed further in Chapter 3) and will begin work on the 2028 Plan in the next fiscal year. BCAG staff work collaboratively with a consultant team to prepare the RTP/SCS. The Sustainable Communities Strategy was the most challenging part of the 2024 Update, as well as receiving approval from the California Air Resources Board. Four BCAG staff members were needed to work on the SCS along with the consultant team. It was a very big effort for a rural region.

Claimant Relationships and Oversight

BCAG does not currently have a productivity committee. However, it conducts regular monitoring of transit operator performance through the claims process and meetings with the B-Line contractor (Transdev) and City of Gridley. As the administrator of Butte Regional Transit, BCAG has direct oversight over Transdev, ensuring compliance with the contract and collaborating with the contractor on how to make service more efficient. BCAG meets with Transdev on a monthly basis.

The City of Gridley has been more challenging to work with given the turnover in Finance Department staff, though this has started to stabilize. BCAG's Chief Fiscal Officer and Programming Director generally meet with City staff once or twice a year to review processes and requirements.

BCAG makes technical and managerial assistance available to both transit operators, and the operators are aware of such assistance. Given BCAG staff administer Butte Regional Transit, this assistance is provided automatically. The City of Gridley is made aware of all resources available through ongoing communications.

One of BCAG's successes during the audit period was the completion of an updated TDA Workbook. The RTPA worked with a consultant to fully update its TDA handbook and claim forms to be reflective of current legislation.

Marketing and Transportation Alternatives

BCAG, as the administrator of BRT, is responsible for all marketing for the B-Line service. In January 2025, it retained a consultant to prepare a three-year marketing program for B-Line. While this does not include separate marketing for the City of Gridley, if the Gridley Feather Flyer service is consolidated into B-Line, the marketing program will include marketing for that service. BCAG anticipates the increased marketing efforts will expand the impact and measurement of transit marketing efforts within Butte County.

BCAG does not currently participate in any alternative transportation programs (such as ridesharing, vanpooling, etc.). However, it is looking at the potential to expand public transportation through the

introduction of microtransit and non-emergency medical transportation (NEMT) services. BCAG has also programmed resources to secure state and federal funds for purposes such as its Active Transportation Program.

BCAG offers input into planning, zoning, and development projects by regional or local government entities upon request. As the RTPA, it has no authority to change the decision-making of local jurisdictions, but will provide input if asked.

Grant Applications and Management

BCAG as the RTPA is generally responsible for preparing grant applications on behalf of Butte Regional Transit. It has not historically applied for or managed funding for the City of Gridley beyond the TDA allocation. The City is not currently staffed to be able to manage additional grants. Grant programs typically utilized by BCAG and the operators include FTA Sections 5304, 5307, 5310, 5311, and 5339; the Low Carbon Transit Operations Program (LCTOP); Transit and Intercity Rail Capital Program (TIRCP), Zero Emission Transit Capital Program (ZETCP), and SB 1.

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Chapter 7 | Findings and Recommendations

Conclusions

With one exception, we find the Butte County Association of Governments, 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 City of Gridley did not complete its TDA fiscal audit prior to the extended deadline during any year of the audit period.

The audit team has identified one functional finding. While this finding is not a compliance finding, the auditors believe it is significant enough to be addressed within this review:

1. There has been discussion with the City of Gridley about consolidating its Feather Flyer service into the B-Line service (administered by BCAG).

In completing this Triennial Performance Audit, the auditors submit the following recommendations for BCAG'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 operator 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.

Compliance Finding 1: The City of Gridley did not complete its TDA fiscal audit prior to the extended deadline during any year of the audit period.

Criteria: PUC 99245 requires recipients of TDA funds to submit an annual fiscal audit within 180 days of the end of the fiscal year, or with a 90-day extension which may be granted by the RTPA. With the extension, fiscal audits are due by March 31 following the end of the fiscal year.

Condition: The City of Gridley completed its FY 2021/22 TDA fiscal audit on June 21, 2024 (more than a year after the extended deadline) and its FY 2022/23 TDA fiscal audit on February 19, 2025 (approximately 11 months after the extended deadline). As of this report (April 4, 2025), the FY 2023/24 TDA fiscal audit had yet to be completed.

Cause: Delays in completing the audits were due to staffing turnover within the City of Gridley's Finance Department. At some points during the audit period only two of five positions were filled. Now that the department is fully staffed, it has been working to catch up on city-wide and TDA fiscal audits.

Effect: When TDA fiscal audits are submitted beyond the established deadline, the operator is out of compliance with the TDA. Operators may not receive TDA allocations until the appropriate TDA fiscal audits have been completed. (This finding is included within the City of Gridley’s audit as well.)

Recommendation: Work with the City of Gridley to ensure it can complete its TDA fiscal audits within the established timeframe.

Recommended Action: Continue to allow extensions through March 31 for transit operators to complete their TDA fiscal audits. Maintain communications with City of Gridley staff to ensure they are aware of the audit timelines so that City audits can be completed far enough in advance to ensure successful completion of TDA fiscal audits on time. This recommendation is provided with the understanding there may be limited action BCAG can take to impact the completion of city-wide audits that result in delays to TDA fiscal audits. Once audits have been completed, work with the City of Gridley to claim the TDA funding for which it is eligible.

Timeline: Ongoing.

Anticipated Cost: Negligible.

Management Response: The City of Gridley not completing its TDA fiscal audit on time has been an ongoing issue and finding. The City is acutely aware of this and has done a good job of making this a priority with recent efforts to fill vacant staff positions specifically tasked with and able to assess and respond to this issue. BCAG believes this issue will resolve by the next audit period.

Functional Finding 1: There has been discussion with the City of Gridley about consolidating its Feather Flyer service into the B-Line service (administered by BCAG).

Criteria: One of the functional areas for RTPAs identified in Caltrans’ *Performance Audit Guidebook* is Claimant Relationships and Oversight. This includes the provision of technical and managerial assistance to transit operators within the RTPA’s jurisdiction.

Condition: BCAG, in its function both as the RTPA and the administrator of Butte Regional Transit (BRT), has recently engaged in discussions with the City of Gridley regarding the consolidation of its Feather Flyer service into the regional B-Line transit service operated by BRT. However, the City is still exploring its options with respect to continuing to operate the service. The City is proud of its local transit program and the service it provides to its residents.

Cause: Staffing changes in the City’s Finance Department have led to some difficulties in effectively managing the City’s transit program. In addition, development in the community may require an increased level of transit service from the City.

Effect: If the City chooses to continue operating the service, it may need to be prepared to expand its capacity and service area. If it does not, BRT would likely be able to provide a comparable level of service in Gridley in addition to its inter-city service connecting Gridley with Oroville and Chico.

Recommendation: Work with the City of Gridley to determine its needs and interest in consolidating the Gridley Feather Flyer into the B-Line service.

Recommended Action: Should the City of Gridley prefer to continue operating the Feather Flyer, as the RTPA BCAG should continue to provide the level of support it has been providing, including support for any planning activities that may become necessary. Should the City choose consolidation with B-Line, BCAG (as the RTPA and administrator of BRT) should work with the City to identify mutually agreed-upon service parameters and a timeline for implementation.

Timeline: FY 2025/26.

Anticipated Cost: Unknown.

Exhibit 7.1 Audit Recommendations

TDA Compliance Recommendations		Importance	Timeline
1	Work with the City of Gridley to ensure it can complete its TDA fiscal audits within the established timeframe.	High	Ongoing
Functional Recommendations		Importance	Timeline
1	Work with the City of Gridley to determine its needs and interest in consolidating the Gridley Feather Flyer into the B-Line service.	High	FY 2025/26

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