



INSPECTOR GENERAL

California Department of Transportation

Town of Apple Valley

Project Audit



Independent Office of Audits and Investigations

Bryan Beyer, Inspector General
Diana Antony, Chief Deputy

November 2023
23A.PJCT02



Inspector General

California Department of Transportation

Bryan Beyer, Inspector General

Diana Antony, Chief Deputy

November 27, 2023

Tony Tavares
Director
California Department of Transportation
1120 N Street
Sacramento, CA 95814

Final Report — Town of Apple Valley, Project Audit

Dear Director Tavares:

On behalf of the Independent Office of Audits and Investigations, the California Department of Finance, Office of State Audits and Evaluations (Finance) completed its audit of the Town of Apple Valley (Town). Finance audited the costs that the Town incurred related to three projects, of which the California Department of Transportation reimbursed the Town a total of \$10,042,416.

Enclosed is the final report, which includes the Town's response to the draft report. Finance's evaluation of the response is incorporated into the final report. The final report is a matter of public record and will be posted on IOAI's website.

A Corrective Action Plan (CAP) addressing the recommendations is due from the California Department of Transportation 60 days from receipt of this letter. Thereafter, CAP updates will be required every 6 months and 1 year from the report issuance date, until all findings have been addressed. The CAP should be sent to ioai.reports@dot.ca.gov.

If you have any questions regarding this report, please contact our office at (916) 323-7111.

Sincerely,


Diana Antony (Nov 27, 2023 15:30 PST)

Diana C. Antony, CPA, CIG
Chief Deputy Inspector General

Gavin Newsom, Governor

Independent Office of Audits and Investigations
P.O. Box 942874, MS-2 (916) 323-7111
Sacramento, CA 94274-0001 <https://oig.dot.ca.gov>

Tony Tavares
November 27, 2023
Page 2

cc: Michael Keever, Chief Deputy Director, California Department of Transportation
Catalino A. Pining III, District Director, District 8, California Department of Transportation
Ben Shelton, Audit Chief, Internal Audits Office, California Department of Transportation
Doug Robertson, Town Manager, Town of Apple Valley
Sydnie Harris, Finance Director, Town of Apple Valley
Rodney Whitfield, Director, Financial Services, Federal Highway Administration
Grace Regidor, Transportation Finance Specialist, Financial Services, Federal Highway
Administration

23A.PJCT02



Town of Apple Valley

Project Numbers: 0813000116, 0818000130,
and 0818000194

Report No. 23-2660-032
November 2023

Team Members

Cheryl L. McCormick, CPA, Chief
Rebecca G. McAllister, CPA, Assistant Chief
Marilyn Standing Horse, CPA, Assistant Chief
Humberto E. Cervantes, CPA, Manager
Mindy Patterson, MBA, Supervisor
Jeffrey Neller, Lead
Brian Johnson
Jon Sutherland

Final reports are available on our website at <https://www.dof.ca.gov>.

You can contact our office at:

California Department of Finance
Office of State Audits and Evaluations
915 L Street, 6th Floor
Sacramento, CA 95814
(916) 322-2985



Gavin Newsom ■ Governor

915 L Street ■ Sacramento CA ■ 95814-3706 ■ www.dof.ca.gov

Transmitted via e-mail

November 21, 2023

Brian Beyer, Inspector General
Independent Office of Audits and Investigations
California Department of Transportation
1120 N Street
Sacramento, CA 95814

Final Report—Town of Apple Valley, California Department of Transportation Project Audits

The California Department of Finance, Office of State Audits and Evaluations, has completed its audit of the Town of Apple Valley's (Town) projects listed below, California Department of Transportation Audit Number 23A.PJCT02:

<u>Project Number</u>	<u>Project Name</u>
0813000116	Bear Valley Road Bridge Number 54C-0086
0818000130	Apple Valley South – Safe Routes to School
0818000194	Route 18 West End Widening – Phase 1 Apple Valley Road Realignment

The enclosed report is for your information and use. The Town's response to the report finding and our evaluation of the response are incorporated into this final report. This report will be placed on our website.

If you have any questions regarding this report, please contact Rick Cervantes, Manager, at (916) 322-2985.

Sincerely,

Cheryl L. McCormick, CPA
Chief, Office of State Audits and Evaluations

cc: Diana Antony, Chief Deputy Inspector General, Independent Office of Audits and Investigations
Frances Parmelee, Deputy Inspector General, Independent Office of Audits and Investigations

BACKGROUND, SCOPE, AND METHODOLOGY

BACKGROUND

Upon appropriation by the Legislature, the California Transportation Commission (CTC) allocates state funds to the California Department of Transportation (Caltrans) to implement various programs.

Caltrans's Local Assistance Program oversees more than \$1 billion annually made available to over 600 cities, counties, and regional agencies for the purpose of improving their transportation infrastructure or providing transportation services. This funding comes from various federal and state programs specifically designed to assist the transportation needs of local agencies.⁵

The Town of Apple Valley (Town) received \$8 million in Senate Bill 1 (SB1), also known as the Road Repair and Accountability Act of 2017, funds for two projects. Additionally, the Federal Highway Administration program allocated \$3.1 million in federal funds to the Town, with Caltrans administering the funding for the federal project. The three projects were as follows:

- **Bear Valley Road Bridge number 54C-0086 (0813000116)** – \$3.1 million in National Highway Performance Program (NHPP) and Surface Transportation Block Grant (STBG) funds from the Highway Bridge Program (HBP) to assess the existing bridge condition including geotechnical, hydraulic and structural evaluations, and traffic operations, and evaluate alternatives for rehabilitation or replacement. Also included is the environmental review, right of way, utility coordination, engineering design, and permitting.
- **Apple Valley South - Safe Routes to School (0818000130)** – \$3.5 million in Active Transportation Program (ATP) funds to design and construct 5,390 feet of sidewalk and replace 9,500 feet of pavement to create a Class 1 bike path; add curb, gutter, berm, signage, striping, Americans with Disabilities Act-compliant ramps, and high visibility crosswalks.

PROGRAM DESCRIPTION

Federal: Federal aid programs include the Highway Bridge Program (HBP).¹ The HBP provides funds for the National Highway Performance Program (NHPP) and the Surface Transportation Block Grant (STBG).² NHPP provides support for the condition and performance of the National Highway System (NHS), for the construction of new facilities on the NHS. STBG provides flexible funding to best address State and local transportation needs.

ATP: \$100 million of SB1 proceeds are made available annually to finance Active Transportation Program (ATP) projects that increase the proportion of trips by walking and biking, increase safety and mobility of non-motorized users to advance greenhouse goals and enhance public health.³

LPP: SB1 created the Local Partnership Program (LPP) and continuously appropriates \$200 million annually to local and regional transportation authorities which have taxes or fees dedicated solely for transportation improvements. The LPP provides funding for aging infrastructure, road conditions, active transportation, transit and rail, and health and safety benefits.⁴

¹ Excerpt obtained from Caltrans's Division of Local Assistance website <https://dot.ca.gov/programs/local-assistance/fed-and-state-programs/highway-bridge-program>.

² Excerpt obtained from Federal Highway Administration website <https://www.fhwa.dot.gov/specialfunding/>.

³ Excerpt obtained from CTC's website <https://catc.ca.gov/programs/active-transportation-program>.

⁴ Excerpt obtained from CTC's website <https://catc.ca.gov/programs/sb1/local-partnership-program>.

⁵ Excerpt obtained from Caltrans's Division of Local Assistance website <http://www.dot.ca.gov/localassistance/index.html>.

- **State Route 18 West End Widening - Phase 1 Apple Valley Road Realignment (0818000194)** – \$4.5 million in Local Partnership Program (LPP) funds to widen Highway 18, realign and widen Apple Valley Road, modify the existing drainage system, replace existing traffic signals, and construct various sidewalk improvements. The Town was required to provide a one-to-one match for project 0818000194.

SCOPE

As requested by Caltrans's Independent Office of Audits and Investigations, the California Department of Finance, Office of State Audits and Evaluations, audited the projects described in the Background section of this report. The *Summary of Projects Reviewed*, including the audit period and the reimbursed expenditures, is presented in Appendix A.

The audit objectives were to determine whether:

1. Project costs were allowable, adequately supported by accounting records and source documents, and in compliance with relevant criteria.
2. Project deliverables/outputs were consistent with the project scope and schedule.
3. Benefits/outcomes were achieved and reported in accordance with applicable requirements.

At the time of fieldwork in January 2023, construction was complete for projects 0818000130 and 0818000194. However, project 0813000116 was not complete and was in the Preliminary Engineering and Right of Way phases.

The Town's management is responsible for ensuring accurate financial reporting; compliance with executed project agreements, state and federal regulations, and applicable program guidelines; and the adequacy of its job cost system to accumulate and segregate reasonable, allocable, and allowable expenditures. Caltrans and CTC are responsible for the state-level administration of the programs.

METHODOLOGY

To plan the audit, we gained an understanding of the projects and respective programs, and identified relevant criteria, by interviewing Caltrans and Town personnel, and reviewing the executed project agreements and amendments, Caltrans/CTC's program guidelines, and applicable state and federal regulations.

We conducted a risk assessment, including evaluating whether the Town's key internal controls significant to our audit objectives were properly designed, implemented, and operating effectively. Key internal controls evaluated focused on procurement, reimbursement request preparation, review and approval processes for expenditures and change orders, project deliverables/outputs completion, and project benefits/outcomes reporting. Our assessment included conducting interviews with Town personnel, observing processes, and testing transactions related to construction phase expenditures, contract procurement, and project deliverables/outputs completion and project benefits/outcomes reporting.

We determined verification of the reliability of data from the Town's financial system, Eden Financial Systems, was not necessary because other sufficient evidence was available to address the audit objectives.

Based on the results of our planning, we developed specific methods for gathering evidence to obtain reasonable assurance to address the audit objectives. Our methods are detailed in the Table of Methodologies.

Table of Methodologies

Audit Objective	Methods
<p>Objective 1: To determine whether the Town's project costs were allowable, adequately supported by accounting records and source documents, and in compliance with relevant criteria.</p>	<ul style="list-style-type: none"> For project 0818000130, determined whether the construction contract was appropriately advertised, evaluated, and awarded to the lowest, responsible bidder by reviewing construction contractor procurement records such as project advertisements, bidding and evaluation documents, and the contract agreement template, and comparing to the Town's policies and procedures and Caltrans Local Assistance Procedures Manual (LAPM) requirements. For project 0818000130, determined whether the consultant contract was appropriately advertised, evaluated, and awarded to the most qualified consultant by reviewing construction engineering procurement records, such as project advertisements, consultant proposals, scoring sheets, and contract agreement template, and comparing to Implementing Agency's policies and procedures and LAPM requirements. Determined if selected reimbursed costs were allowable, authorized, project-related, incurred within the allowable time frame, paid, and supported by reviewing accounting records, progress payment estimates, invoices, and canceled checks, and comparing to relevant criteria. <ul style="list-style-type: none"> For projects 0818000130 and 0818000194, one construction progress payment estimate was selected based on quantitative significance from the construction category. For project 0813000116, three consultant invoices were selected based on quantitative significance from the preliminary engineering and right-of-way categories. For project 0818000130, one consultant invoice was selected based on quantitative significance from the plans, specifications and estimates category. For project 0818000194, two consultant invoices were selected based on quantitative significance from the construction engineering category. For project 0818000194, determined if selected match costs were allowable, project-related, incurred within the allowable time frame, and supported, by reviewing accounting records and progress payments, and comparing project reimbursed amounts with project expenditure reports. In addition, we verified the source of funds used to meet the match requirement complied with LPP guidelines. For project 0818000130, selected the one contract change order (CCO). Determined if the selected CCO was authorized, within the scope of work, not a contract duplication, completed, and supported, by reviewing the CCO and contractor correspondence. For all three projects, evaluated whether other revenue sources were used to reimburse costs claimed for reimbursement under the executed project agreements by reviewing reimbursement requests submitted to Caltrans and contractor invoices, and performed analytical procedures to identify possible duplicate payments.

Audit Objective	Methods
<p>Objective 2: To determine whether project deliverables/outputs were consistent with the project scope and schedule.</p>	<ul style="list-style-type: none"> • For projects 0818000130 and 0818000194, determined whether project deliverables/outputs were consistent with the project scopes by reviewing the Project Programming Requests (PPR), project agreements, the Notice of Completions, site photographs, and Google Map images to verify project existence. • For project 0818000130, evaluated whether selected project deliverables/outputs were completed on schedule as described in the PPR by reviewing a Time Extension, the Town's press release website, a Notice of Completion, and the Final Delivery Report (FDR). • For project 0818000194, evaluated whether selected project deliverables/outputs were completed on schedule as described in the PPR by reviewing Milestone Updates, the Notice of Completion, the project Completion Report, and the California State Multi-Modal Accounting Reporting Tool (CalSMART) reporting portal.
<p>Objective 3: To determine whether benefits/outcomes were achieved and reported in accordance with applicable requirements.</p>	<ul style="list-style-type: none"> • For projects 0818000130 and 0818000194, determined whether project benefits/outcomes were achieved and adequately reported by reviewing the Completion Report and FDR.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

CONCLUSION

Based on the procedures performed and evidence gathered, we obtained reasonable assurance the project costs were allowable, adequately supported by accounting records and source documents, and in compliance with relevant criteria.

We also obtained reasonable assurance the project deliverables/outputs were consistent with the project scopes and schedules for projects 0818000130 and 0818000194. Although projects 0818000130 and 0818000194 were behind schedule, the Town appropriately informed Caltrans of the delay.

For projects 0818000130 and 0818000194, the project benefits/outcomes, described in the executed project agreements or approved amendments were not adequately reported to Caltrans, as described in Finding 1.

FINDINGS AND RECOMMENDATIONS

Finding 1: Project Benefits/Outcomes were not Reported to Caltrans.

For projects 0818000130 and 0818000194, the Town did not report project benefits/outcomes in the Completion Report or FDR submitted to Caltrans. Caltrans confirmed the project benefits/outcomes were not submitted. Additionally, for project 0818000130, the Town did not maintain documentation supporting the submitted Completion Report. Lastly, Caltrans deleted the Completion Report for project 0818000130 submitted in CalSMART and the CalSMART input fields for both projects were not editable. The Town did not believe the information was required since the CalSMART fields were not editable, and Caltrans did not request the information.

The Town is responsible for reporting project benefits/outcomes and maintaining documentation supporting the Completion Report. CTC's SB1 Accountability and Transparency Guidelines, section D (Follow-up Accountability), subsections 1 and 2 states within six months of construction contract acceptance or the project becoming operable (open to the public), whichever comes sooner, the implementing agency shall provide a Completion Report to Caltrans on the scope of the completed project, its estimated final cost, estimated schedule, and project benefits as compared to those included in the executed project agreements. Additionally, the Completion Report shall describe the methodologies and assumptions used to evaluate how the project benefits were calculated as compared to methodologies and assumptions used in the executed project agreements. Documentation used for the benefit evaluation shall be preserved and made available for review if requested. Lastly, the FDR must include an updated evaluation of the benefits.

By not reporting on whether the benefits/outcomes were achieved, Caltrans, CTC, or other interested parties would not know whether the project had met its intended goals.

Recommendations:

- A. Coordinate with Caltrans SB1 program coordinators to resubmit the Completion Reports to include the evaluation of project benefits/outcomes achieved.
- B. Ensure all project documentation is maintained, including data, methodologies, and assumptions used to support the benefits reported to Caltrans.

The following acronyms are used throughout Appendix A.

- Active Transportation Program: ATP
- Americans with Disabilities Act: ADA
- California Department of Transportation: Caltrans
- California Transportation Commission: CTC
- Final Delivery Report: FDR
- Local Partnership Program: LPP
- National Highway Performance Program: NHPP
- Surface Transportation Block Grant: STBG
- Town of Apple Valley: Town

Summary of Projects Reviewed

Project Number	Reimbursed Costs	Project Status	Costs in Compliance	Deliverables/ Outputs Consistent	Benefits/ Outcomes Achieved	Benefits/ Outcomes Adequately Reported	Page
0813000116	\$2,380,726	I	Y	N/A ¹	N/A ¹	N/A ¹	A-1
0818000130	\$3,470,000	C	Y	Y	N	N	A-2
0818000194	\$4,191,690	C	Y	Y	N	N	A-3

Legend

- C = Construction is complete, and the project is operational.
- I = Construction is not complete.
- Y = Yes
- N = No, Project benefits/outcomes were not reported in the Completion Report or the FDR submitted to Caltrans.
- N/A¹ = Not Applicable: Project 0813000116 is in the Preliminary Engineering and Right of Way phases and has not begun construction.

Project Number: 0813000116

Project Name: Bear Valley Road Bridge Number 54C-0086

Program Name: NHPP and STBG

Project Description: Assess the existing bridge condition (geotechnical, hydraulic, structural, traffic operations), evaluate alternatives for rehabilitation or replacement, type selection, environmental review, right of way, utility coordination, engineering design, permitting, and construction.

Audit Period: June 12, 2013 through April 30, 2022 for audit objective 1⁶
June 12, 2013 through January 10, 2023 for audit objectives 2 and 3⁷

Project Status: Preliminary Engineering and Right of Way phases and construction has not started.

Schedule of Costs

Category	Reimbursed Costs
Preliminary Engineering	\$ 2,290,496
Right of Way Utility	53,118
Right of Way Engineering	37,112
Total Costs	\$ 2,380,726

Results:

Compliance—Costs

The project costs were allowable, adequately supported by accounting records and source documents, and in compliance with relevant criteria.

Deliverables/Outputs

Construction on this project has not commenced.

Benefits/Outcomes

Actual project benefits/outcomes are not assessed for the Preliminary Engineering and Right of Way phases. Actual project benefits/outcomes are reported when construction is complete, and the project becomes operable.

⁶ The audit period end date reflects the billing period end date of the last reimbursement claim submitted to and approved by Caltrans.

⁷ The audit period end date reflects the end of audit fieldwork date.

Project Number: 0818000130

Project Name: Apple Valley South – Safe Routes to School

Program Name: ATP

Project Description: Design and construct 5,390 feet of new sidewalk and replace 9,500 feet of pavement to create a Class 1 bike path, add curb and gutter; signage and striping; ADA ramps; and high visibility crosswalks. The project will encompass Navajo Road from Bear Valley Road to Tussing Ranch Road; Trussing Ranch Road from Bear Valley Road to Conchiti Road; Sandia Road from Mohawk Road to Bear Valley Road; and Manhasset Road from Tussing Ranch Road to Panoche Road.

Audit Period: March 22, 2018 through December 31, 2020 for audit objective 1⁸
March 22, 2018 through January 6, 2022 for audit objectives 2 and 3⁹

Project Status: Construction is complete.

Schedule of Costs

Category	Reimbursed Costs
Plans, Specifications & Estimates	\$ 333,000
Construction	3,137,000
Total Costs	\$ 3,470,000

Results:

Compliance–Costs

The project costs were allowable, adequately supported by accounting records and source documents, and in compliance with relevant criteria.

Deliverables/Outputs

The construction phase of the project was completed in March 2021. At the time of our fieldwork in January 2023, project deliverables/outputs were consistent with the project scope. Although the project was behind schedule and completed nine months late; the Town appropriately updated Caltrans and CTC of the delay.

Benefits/Outcomes

Project 0818000130, benefits/outcomes were not reported in the Completion Report and the FDR as noted in Finding 1.

⁸ The audit period end date reflects the billing period end date of the last reimbursement claim submitted to and approved by Caltrans.

⁹ The audit period end date reflects the FDR submission date.

Expected Benefits/Outcomes Reported in the Project Agreement	Actual Benefits/Outcomes Reported in the Completion Report and FDR	Benefits/ Outcomes Achieved
The project will provide non-motorized transportation links for disadvantaged community residents for safe access to schools, resource centers, parks, and bus transportation to reach medical services, employment centers, and regional shopping.	Not Reported	No

Project Number: 0818000194

Project Name: Route 18 West End Widening – Phase 1 Apple Valley Road Realignment

Program Name: LPP

Project Description: In the Town of Apple Valley, at the intersection of Highway 18 and Apple Valley Road. Construction includes widening existing Highway 18 from four to six lanes, realigning, and widening Apple Valley Road, modifying the existing drainage system, replacing the existing traffic signals, sidewalks with ADA improvements, and new retaining walls on both sides of Highway 18.

Audit Period: April 22, 2019 through October 31, 2021 for audit objective 1¹⁰
April 22, 2019 through December 13, 2022 for audit objectives 2 and 3¹¹

Project Status: Construction is complete.

Schedule of Costs

Category	Reimbursed Costs
Construction	\$ 3,511,690
Construction Support	680,000
Total Expenditures	\$ 4,191,690

Results:

Compliance–Costs

The project costs were allowable, adequately supported by accounting records and source documents, and in compliance with relevant criteria. Additionally, the match requirement was met.

Deliverables/Outputs

The construction phase of the project was completed in December 2022. At the time of our fieldwork in January 2023, project deliverables/outputs were consistent with the project scope. Although the project was behind schedule and completed 29 months late, the Town appropriately updated Caltrans and CTC of the delay.

Benefits/Outcomes

Project 0818000194, benefits/outcomes were not reported in the Completion Report as noted in Finding 1.

Expected Benefits/Outcomes Reported in the Project Programming Request	Actual Benefits/Outcomes Reported in the Completion Report	Benefits/Outcomes Achieved
Congestion relief, improved operations and pedestrian mobility, reduced idle time/greenhouse gas reductions.	Not Reported	Not Reported

¹⁰ The audit period end date reflects the billing period end date of the last reimbursement claim submitted to and approved by Caltrans.

¹¹ The audit period end date reflects the Notice of Completion date.

The Town included names of individuals in its Response. Our practice is to refer to individuals by title and/or by entity; therefore, we redacted the names where appropriate.



California Department of Finance
Office of State Audits and Evaluations
915 L Street, 6th Floor
Sacramento, CA 95814

11/9/2023

Dear Office of Audits and Evaluations,

Pursuant to the Confidential Draft Report – Town of Apple Valley, California Department of Transportation Project Audits, we are herein providing Management Response to the Finding detailed therein.

Finding 1:

Project 0818000130; Town Management disagrees with the finding. The requirement to report benefits/outcomes was met in the Completion Report successfully submitted on January 4, 2021. If all applicable data had not been reported, the CalSmart system would have rejected the submission. As verification of the submission, a copy of the email receipt noting the successful submission on January 4, 2021, was provided to the auditors during review.

Project 00818000194; Town Management disagrees with the finding. Benefits/Outcomes were reported to Caltrans in the Completion Report. Under the General Information tab, the approved benefits/outcomes are described. The Outcomes tab was not editable. Under the Corrective Action Plan tab, the benefits were reported as “no change” by the Town’s Project Manager. Thus, the requirement to report benefits/outcomes was met in the Completion Report approved by CalTrans in January 2023.

The Town of Apple Valley Project Managers did their due diligence to ensure that all pertinent information was submitted in a timely manner. Project benefits/outcomes were in precise alignment with the executed project agreements.

Finding 1 Recommendations:

A. Coordinate with Caltrans SB1 program coordinators to resubmit the Completion Reports to include the evaluation of project benefits/outcomes achieved.

Project 0818000130: Town’s Project Manager did coordinate with the SB1 program coordinator, _____ and on November 8, 2023, did resubmit the requested report to include the evaluation of project benefits/outcomes achieved. The CalSmart Reporting system indicated submission and was verified by Project Manager on November 8, 2023.

Project 0818000194: Town’s Project Manager did coordinate with the SB1 program coordinator, _____ and on November 9, 2023, did resubmit the requested report to include the evaluation of project benefits/outcomes achieved. The CalSmart Reporting system indicated submission and was verified by Project Manager on November 9, 2023.

B. Ensure all project documentation is maintained, including data, methodologies, and assumptions used to support the benefits reported to Caltrans.

Projects 0818000130 and 0818000194: Town's Project Managers do and shall continue to ensure all project documentation is maintained, including data, methodologies, and assumptions used to support the benefits reported to Caltrans.

Respectfully,

A handwritten signature in black ink, appearing to be 'Orlando Acevedo', written in a cursive style.

Orlando Acevedo
Assistant Town Manager

Acting Town Manager

The Town's response to the draft audit report has been reviewed and incorporated into the final report. We acknowledge the Town's willingness to implement our recommendations, and in evaluating the Town's response, we provide the following comments:

Finding 1: Project Benefits/Outcomes were not reported to Caltrans.

- For project 0818000130, the Town disagrees that the requirement to report benefits/outcomes in the Completion Report was not met. Although an emailed receipt noting the successful submission of the report within CalSMART was provided, the Town could not provide a copy of the Completion Report during our fieldwork as a copy of the report was not maintained by the Town. In addition, as stated in the draft report, we confirmed with Caltrans that the project benefits/outcomes were not submitted. Therefore, the finding for project 0818000130 remains unchanged.

The Town's response also stated that after the draft report issuance, it coordinated with Caltrans SB1 program coordinators to resubmit the Completion Report within CalSMART for project 0818000130. We acknowledge the Town's willingness to implement the report recommendations.

- For project 0818000194, the Town disagrees that the requirement to report benefits/outcomes in the Completion Report was not met. The Town stated that the benefits information was previously stated under the Approved Benefits section of the report and that the reporting portion was not editable within the CalSMART reporting portal. As stated in the report, we confirmed with Caltrans that the project benefits/outcomes were not submitted. Therefore, the finding for project 0818000194 remains unchanged.

The Town's response also stated that after the draft report issuance, it coordinated with Caltrans SB1 program coordinators to resubmit the Completion Report within CalSMART for project 0818000194. We acknowledge the Town's willingness to implement the report recommendations.