



U.S. Department
of Transportation
**Federal Transit
Administration**

REGION IX
Arizona, California,
Hawaii, Nevada, Guam,
American Samoa,
Northern Mariana Islands

888 South Figueroa Street
Suite 440
Los Angeles, CA 90017-5467
213-202-3950 (Southern California)
415-734-9490 (Bay Area)

September 20, 2024

Justin Jones
Chairman
Regional Transportation Commission
of Southern Nevada
600 S Grand Central Pkwy Ste 350
Las Vegas, NV 89106

Re: FY 2024 Triennial Review Final Report

Dear Mr. Jones:

I am pleased to provide you with a copy of the Federal Transit Administration (FTA) final report which documents the results of FTA's Fiscal Year (FY) 2024 Triennial Review of the Regional Transportation Commission of Southern Nevada (RTC) of Las Vegas, Nevada. Although not an audit, the Triennial Review, as required by [49 U.S.C. 5307\(f\)\(2\)](#), is the FTA's assessment of RTC's compliance with federal requirements, determined by examining a sample of award management and program implementation practices. As such, the Triennial Review is not intended as, nor does it constitute, a comprehensive and final review of compliance with program funding requirements.

Due to the Coronavirus 2019 (COVID-19) Public Health Emergency, FTA expanded the review to address RTC's compliance with the administrative relief and flexibilities FTA granted and the requirements of the [COVID-19 Relief](#) funds provided through the *Coronavirus Aid, Relief, and Economic Security Act* of 2020 (CARES); *Coronavirus Response and Relief Supplemental Appropriations Act* of 2021 (CRRSAA); and the *American Rescue Plan Act* of 2021 (ARP).

The Triennial Review focused on RTC's compliance in 23 areas. The review revealed one (1) deficiency in one (1) area:

7. Satisfactory Continuing Control

RTC had no repeat deficiencies from the FY 2021 Triennial Review.

Thank you for your cooperation and assistance during this Triennial Review. If you have any questions, please contact your assigned Post-Award Manager, Catherine Luu, General Engineer, at 415-734-9467 or catherine.luu@dot.gov; or your assigned Review Coordinator, Philoki Barros, Transportation Program Specialist, at 415-734-9452 or philoki.barros@dot.gov.

Sincerely,

For Ray Tellis
Regional Administrator

Attachment

FINAL REPORT

**FISCAL YEAR 2024
TRIENNIAL REVIEW**

of

**Regional Transportation Commission of Southern Nevada
RTC
Las Vegas, NV
ID: 1643**

Performed for:

**U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL TRANSIT ADMINISTRATION
REGION 9**

Prepared By:

TFC Consulting Inc.

Desk Review/Scoping Meeting Date: March 19-22, 2024

Site Visit Entrance Conference Date: July 9, 2024

Site Visit Exit Conference Date: July 18, 2024

Draft Report Date: August 16, 2024

Final Report Date: September 20, 2024

Table of Contents

I.	Executive Summary	1
	Summary of Findings	1
II.	Review Background and Process	3
1.	Background.....	3
2.	Process	3
	Key Review Dates	4
3.	Metrics.....	4
III.	Recipient Description	5
1.	Organization	5
2.	Award and Project Activity.....	6
IV.	Results of the Review.....	8
1.	Legal	8
2.	Financial Management and Capacity	8
3.	Technical Capacity – Award Management	8
4.	Technical Capacity – Program Management & Subrecipient Oversight	8
5.	Technical Capacity – Project Management.....	8
6.	Transit Asset Management	9
7.	Satisfactory Continuing Control	9
8.	Maintenance	10
9.	Procurement.....	10
10.	Disadvantaged Business Enterprise (DBE)	11
11.	Title VI.....	11
12.	Americans with Disabilities Act (ADA) – General.....	11
13.	ADA – Complementary Paratransit.....	11
14.	Equal Employment Opportunity (EEO)	11
15.	School Bus	12
16.	Charter Bus	12
17.	Drug Free Workplace Act.....	12
18.	Drug and Alcohol Program	12
19.	Section 5307 Program Requirements	12
20.	Section 5310 Program Requirements	13
21.	Section 5311 Program Requirements	13
22.	Public Transportation Agency Safety Plan (PTASP).....	13
23.	Cybersecurity.....	13
V.	Participants.....	15
	Appendix	18

I. Executive Summary

This report documents the Federal Transit Administration’s (FTA) Triennial Review of the Regional Transportation Commission of Southern Nevada (RTC) of Las Vegas, Nevada. The FTA wants to ensure that awards are administered in accordance with the requirements of federal public transportation law in [49 U.S.C. Chapter 53](#). The review was performed by TFC Consulting, Inc. During the site visit, the reviewers discussed the administrative and statutory requirements and reviewed recipient documents.

Due to the Coronavirus 2019 (COVID-19) Public Health Emergency, the FTA expanded the review to address RTC’s compliance with the administrative relief and flexibilities that the FTA granted, and the requirements of the [COVID-19 Relief](#) funds provided through the *Coronavirus Aid, Relief, and Economic Security Act* of 2020 (CARES); *Coronavirus Response and Relief Supplemental Appropriations Act* of 2021 (CRRSAA); and the *American Rescue Plan Act* of 2021 (ARP). The FTA also requested RTC share if and/or how it suspended, deviated from, or significantly updated or altered its transit program due to the public health emergency.

The Fiscal Year (FY) 2024 Triennial Review focused on RTC’s compliance in 23 areas.

The review found a deficiency in the area identified in the summary table below (Finding = “D”). The review found no repeat findings from the FY 2021 Triennial Review. Deficiencies related to the COVID-19 Relief funds have been clearly identified as part of the deficiency description in the respective review area. The details of the required response, i.e., the corrective action(s), are presented at the end of each deficient review area in the body of the report.

Summary of Findings

Review Area	Finding	Deficiency		Response Due Date	Date Closed
		Code	Description		
1. Legal	ND				
2. Financial Management and Capacity	ND				
3. Technical Capacity – Award Management	ND				
4. Technical Capacity – Program Management and Subrecipient Oversight	NA				
5. Technical Capacity – Project Management	ND				
6. Transit Asset Management	ND				
7. Satisfactory Continuing Control	D	SCC10-1	Excessive fixed-route bus spare ratio	12/19/2024	

Review Area	Finding	Deficiency		Response Due Date	Date Closed
		Code	Description		
8. Maintenance	ND				
9. Procurement	ND				
10. Disadvantaged Business Enterprise	ND				
11. Title VI	ND				
12. Americans with Disabilities Act (ADA) – General	ND				
13. ADA – Complementary Paratransit	ND				
14. Equal Employment Opportunity	ND				
15. School Bus	ND				
16. Charter Bus	ND				
17. Drug-Free Workplace	ND				
18. Drug and Alcohol Program	ND				
19. Section 5307 Program Requirements	ND				
20. Section 5310 Program Requirements	ND				
21. Section 5311 Program Requirements	NA				
22. Public Transportation Agency Safety Plan	ND				
23. Cybersecurity	NA				

The metrics used to evaluate whether a recipient is meeting the requirements for each of the areas reviewed are: Deficient (D) / Not Deficient (ND) / Not Applicable (NA).

II. Review Background and Process

1. Background

The [United States Code, Chapter 53 of Title 49](#) [49 U.S.C. 5307(f)(2)] requires that “At least once every 3 years, the Secretary shall review and evaluate completely the performance of a recipient in carrying out the recipient’s program, specifically referring to compliance with statutory and administrative requirements...” The FTA performs this Triennial Review in accordance with its procedures (published in FTA Order 9010.1B, April 5, 1993).

The [Triennial Review](#) includes a review of the recipient’s compliance in 23 areas. The basic requirements for each of these areas are summarized in Section IV. The FTA contracts with experienced reviewers to lead and conduct the reviews, in partnership with the staff of the regional office.

This report presents the findings from the Triennial Review of the recipient. The review concentrated on procedures and practices employed since the recipient’s previous Triennial Review in 2021; however, coverage was extended to earlier periods as appropriate to assess the policies in place and the management of award funds. The specific documents reviewed and referenced in this report are available at the FTA regional office or the recipient’s location.

2. Process

The Triennial Review includes a pre-review assessment, a desk review and scoping meeting with the FTA regional office, and a site visit to the recipient’s location. Due to the Coronavirus 2019 (COVID-19) Public Health Emergency, the FTA expanded the review to address the recipient’s compliance with the administrative relief and flexibilities that the FTA granted, and the requirements of the [COVID-19 Relief](#) funds provided through the *Coronavirus Aid, Relief, and Economic Security Act* of 2020 (CARES); *Coronavirus Response and Relief Supplemental Appropriations Act* of 2021 (CRRSAA); and the *American Rescue Plan Act* of 2021 (ARP). The FTA also requested the recipient share if and/or how it suspended, deviated from, or significantly updated or altered its transit program due to the public health emergency.

The Fiscal Year (FY) 2024 process began with the regional office transmitting FTA’s notification of the review and a Recipient Information Request (RIR). While the recipient prepared its response to the RIR, the regional office and review team conducted a desk review and scoping meeting. Regional office staff provided electronic files as necessary to the reviewers who also accessed recipient information in the FTA electronic award management and program oversight systems: [Transit Award Management System \(TrAMS\)](#) and [Oversight Tracking System \(OTrak\)](#). Following the desk review and scoping meeting, the reviewers and the recipient corresponded and exchanged information and documentation in preparation for the site visit. Prior to the site visit, the reviewer sent to the recipient an agenda package indicating the issues for discussion, records to be reviewed, and interviews to be conducted.

The site visit began with an entrance conference at which the reviewers and regional staff discussed the purpose of the Triennial Review and the review process. The reviewers conducted additional interviews and reviewed documentation to evidence the recipient's compliance with FTA requirements.

Upon completion of the site visit, the reviewers and the FTA regional office staff discussed preliminary findings with the recipient, and subsequently presented and provided the findings formally at the exit conference, conducted virtually. The table below summarizes key review dates. Section V of this report lists the individuals participating in the entrance conference, exit conference, and/or the site visit.

Key Review Dates

12/20/2023	FTA transmits the Recipient Information Request (RIR)
2/29/2024	RIR response is due to the Reviewers
3/19-22/2024	Scoping Meeting between FTA and the Reviewers
6/24/2024	Reviewer transmits the Agenda Package
7/9/2024	Site Visit begins with Entrance Conference
7/11/2024	Site Visit ends
7/18/2024	Exit Conference (virtual)
9/20/2024	Final Report to be sent to the Recipient within 45 business days from the Exit Conference

3. Metrics

The metrics used to evaluate whether a recipient is meeting the requirements for each of the areas reviewed are:

- Not Deficient (ND): An area is considered not deficient if, during the review, nothing came to light that would indicate the requirements within the area reviewed were not met.
- Deficient (D): An area is considered deficient if any of the requirements within the area reviewed were not met.
- Not Applicable (NA): An area can be deemed not applicable if, after an initial assessment, the recipient does not conduct activities for which the requirements of the respective area would be applicable.

III. Recipient Description

1. Organization

The Regional Transportation Commission of Southern Nevada (RTC), established in 1965, is a local government agency, the transit authority, and the transportation-planning agency for southern Nevada. RTC established fixed-route transit services in 1993 and paratransit services in 1994. The population of the service area is approximately 2,322,985. RTC utilizes Transdev as its fixed-route service contractor and MV Transportation as its paratransit service contractor.

RTC offers multiple fare schedules for its fixed-route service. The following fare schedule is offered for residential routes: \$2.00 for single ride, two-hour pass for \$3.00, 24-hour pass for \$5.00, 15-day pass for \$34.00, and 30-day pass for \$65.00. Children five (5) years of age and younger ride free and must be accompanied by an adult. Reduced fares are offered to the following passengers: 6-17 years of age, senior citizens 60+ years of age, persons with disabilities, and passengers with a Medicare card. RTC's reduced fare schedule is the following: \$1.00 for single ride, two-hour pass for \$1.50, 24-hour pass for \$2.50, 15-day pass for \$17.00, and 30-day pass for \$32.50. Passengers must present a reduced fare photo I.D. card or Clark County School ID (current school year) to the vehicle operator to be eligible for reduced fares. For the Strip and All Access routes, RTC offers the following fare schedule: two-hour pass for \$6.00, 24-hour pass for \$8.00, and three-day pass for \$20.00. Children five (5) years of age and younger ride for free and must be accompanied by a responsible person. All residential passes are valid on the Strip and All Access routes with a local ID. Visitors are required to pay the established Strip and All Access fares. The one-way base cash fare for paratransit services is \$3.00.

RTC's administration office is located at 600 South Grand Central Parkway in Las Vegas. RTC has the following five transit centers:

- South Strip Transit Terminal (6675 South Gillespie Street, Las Vegas)
- Bonneville Transit Center (101 East Bonneville Avenue, Las Vegas)
- Centennial Hills Transit Center and Park & Ride (7313 Grand Montecito Parkway, Las Vegas)
- Westcliff Transit Center and Park & Ride (25 South Durango Drive, Las Vegas)
- University of Nevada, Las Vegas (UNLV) Transit Center (4505 South Maryland Parkway, Las Vegas).

RTC's three bus garages are located at:

- 3200 Citizens Avenue in North Las Vegas (Integrated Bus Maintenance Facility)
- 5165 West Sunset Road in Las Vegas (Sunset Maintenance Facility)
- 260 East Laughlin Civic Drive in Laughlin (Laughlin Transit Maintenance Facility).

RTC's other facility is the Bonneville Transit Center Annex which is located at 528 South Casino Center Boulevard in Las Vegas. All of RTC's facilities, with the exception of its administrative office, are FTA-funded.

RTC operates a fleet of 460 buses for fixed-route bus service and 441 paratransit vehicles. The fleet consists of compressed natural gas (CNG)-powered buses, hydrogen fuel cell buses, and electric buses. The fixed-route service operates with 289 vehicles during peak service. The fixed-route service is provided 24 hours a day and seven days a week. The demand-response service operates on the same schedule as RTC's fixed-route service.

2. Award and Project Activity

Below is a list of RTC's open awards at the time of the review.

FAIN	Award Amount	Year Executed	Award Name
NV-2019-010-00	\$50,298,787.00	2019	5307 Para/Specialized services vehicle expansion/replacement; fixed route vehicle replacement; Facilities acquisition/improvements paving, equipment replace/add; software replace/acquisition, Safety/surveillance sys., Bus Shelters, FTA/NTI Training
NV-2023-014-00	\$1,960,000.00	2023	FY23 Community Project Funding - Transit Amenities/Standalone Solar Lighting
NV-2023-018-00	\$2,000,000.00	2023	FY22 Community Project Funding - Bus Replacement
NV-2023-007-00	\$4,870,000.00	2023	FY21 5339(b) Buses & Bus Facilities Discretionary Grant: Hydrogen Fuel Cell Electric Buses; Transit Amenities Improvements
NV-2024-003-00	\$630,000.00	2024	FY22 Section 5305-2 Areas of Persistent Poverty Discretionary Grant: Equitable Access to Mobility Plan
NV-2020-020-00	\$50,115,510.00	2020	5307 Para/Specialized services vehicle expansion/replacement; fixed route vehicle replacement; Facilities acquisition/improvements R&M various, equipment replace/add; software replace/acquisition, transit enhancements, FTA/NTI Training; Capital Cost of Contracting
NV-2020-009-00	\$7,475,000.00	2020	5339 Bus & Bus Facilities Discretionary Grant: Bus Camera Systems Replacements; Maintenance Facilities Improvements
NV-2023-010-00	\$6,737,042.00	2023	FY22 5339(c) Low-No Emission Discretionary Grant: Hydrogen Fuel Cell Electric Buses (FCEBs) and Workforce Development Activities
NV-2024-005-00	\$3,575,200.00	2024	FY23 Community Project Funding - Pedestrian Detection and Collision Avoidance Technology
NV-2021-024-00	\$4,544,445.00	2021	5310 Formula Program at 100%. CNG Para Transit/Specialized Services Replacement Vehicles
NV-2021-013-00	\$500,000.00	2021	5312 Public Transportation COVID-19 Demonstration - New EMV (Europay, Mastercard and Visa) certified electronic validators for contactless payment on fixed route.
NV-2023-013-00	\$3,339,272.00	2023	FY21-22 5310 (Lapsing) - Paratransit Replacement Vehicles
NV-2021-017-00	\$128,624.00	2021	D2020-MFAP-012 Mobility for All (M4A) Discretionary Pilot Program - RTC Mobile Learning Lab
NV-2021-027-00	\$3,853,200.00	2021	5339 Low-No Emission Discretionary Grant: Hydrogen Fuel Cell Electric Buses (FCEBs), Fueling Station and Infrastructure
NV-2023-003-00	\$450,000.00	2023	FY21 5307 ARPA: Route Planning Restoration Discretionary Grant; Transit Amenities Planning and Design

FAIN	Award Amount	Year Executed	Award Name
NV-2023-005-00	\$560,000.00	2023	FY22 20005b Transit Oriented Development (TOD); Boulder Highway Bus Rapid Transit Station Concept Plans
NV-2020-003-00	\$5,319,838.00	2020	BUILD GoMed Las Vegas Medical District Automated Circulator and Connected Pedestrian Safety Project
NV-2024-006	\$5,861,631.00	2024	FY23 Section 79-BD-4 RAISE Discretionary Grant: Charleston Blvd High-Capacity Transit Project
NV-2024-008	\$149,999,000.00	2024	Maryland Parkway Bus Rapid Transit (BRT) Project

RTC received Supplemental Funds for operating assistance in award numbers NV-2021-002, NV-2021-010, NV-2023-004, and NV-2023-003-00. This is not the first Triennial Review RTC received operating assistance from the FTA.

Projects Completed

RTC completed the following noteworthy projects during the last three years:

- CNG Infrastructure Project
- Integrated Bus Maintenance Facility Bus Wash Improvement Project
- Sunset Maintenance Facility Paratransit Bus Wash Project

Ongoing Projects

RTC is currently implementing the following noteworthy projects:

- Maryland Parkway Bus Rapid Transit Project
- Las Vegas Medical District Automated Circulator and Connected Pedestrian Safety Program (GoMed)
- Hydrogen Fueling Facility

Future Projects

RTC plans to pursue the following noteworthy projects in the next three to five years:

- Charleston Boulevard High-Capacity Transit Planning
- Completing the Reimagine Boulder Highway

IV. Results of the Review

1. Legal

Basic Requirement: The recipient must promptly notify the FTA of legal matters and additionally notify the USDOT Office of Inspector General (OIG) of any instances relating to false claims under the [False Claims Act](#) or fraud. Recipients must comply with restrictions on lobbying requirements.

Finding: No deficiencies.

2. Financial Management and Capacity

Basic Requirement: The recipient must have financial policies and procedures; an organizational structure that defines, assigns, and delegates fiduciary authority; and financial management systems in place to manage, match, and charge only allowable costs to the award. The recipient must conduct required Single Audits, as required by [2 CFR Part 200 Subpart F](#), and provide financial oversight of subrecipients.

Finding: No deficiencies.

3. Technical Capacity – Award Management

Basic Requirement: The recipient must report progress of projects in awards to the FTA and close awards timely.

Finding: No deficiencies.

4. Technical Capacity – Program Management & Subrecipient Oversight

Basic Requirement: Designated Recipients of Sections 5310, 5311, and 5339 funds must develop and submit a Program Management Plan to the FTA for approval. Recipients must enter into an agreement with each subrecipient, obtain required certifications from subrecipients, report in the [Federal Funding Accountability and Transparency Act Subaward Reporting System \(FSRS\)](#) on subawards, and ensure subrecipients comply with the terms of the award.

Finding: Not Applicable. This section only applies to recipients that have subrecipients.

5. Technical Capacity – Project Management

Basic Requirement: The recipient must implement the FTA-funded projects in accordance with the award application, the [FTA Master Agreement](#), and applicable laws and regulations using sound management practices.

Finding: No deficiencies.

6. Transit Asset Management

Basic Requirement: Recipients must comply with [49 CFR Part 625](#) to ensure public transportation providers develop and implement [transit asset management \(TAM\) plans](#).

Finding: No deficiencies.

7. Satisfactory Continuing Control

Basic Requirement: The recipient must ensure that FTA-funded property will remain available and used for its originally authorized purpose throughout its useful life until disposition.

Finding: One (1) deficiency.

Deficiency Description: **SCC10-1: Excessive fixed-route bus spare ratio**

FTA's spare ratio policy helps to ensure that buses are not acquired until they are needed. Notably, the policy does not require recipients to dispose of vehicles prior to the end of the useful life in order to keep the spare ratio at or below 20 percent. Rather, the policy provides that recipients with a spare ratio higher than 20 percent justify the reason for acquisition of new vehicles at the time they submit an award application as specified in [FTA Circular 5010](#).

If applying for a new award, recipients may seek a short-term deviation from the spare ratio requirements for small deviations by preparing a brief justification explaining the reason for the deviation, a date by which the fleet spare ratio will come into compliance with the general requirements, and the recipient's plans to come into compliance. The deviation will generally be granted for no more than two years and must be approved by the regional administrator either in writing or by approval of the award. Recipients must promptly inform the regional office of any significant changes related to spare ratios, including plans for disposition or acquisition of vehicles and changes in vehicle needs.

A review of TrAMS indicated that FTA Region 9 approved the recipient's spare ratio deviation request of 30.74 percent on March 10, 2021. FTA approved this spare ratio deviation through December 31, 2022. The recipient has continued to receive and submit awards for rolling stock replacement, and its spare ratio (59 percent) remains above the 20 percent threshold. The recipient has not submitted a current deviation plan to FTA to reduce its spare ratio down to 20 percent.

Corrective Actions and Schedule: By December 19, 2024, RTC must submit to the FTA Region 9 Regional Administrator and in OTrak a short-term spare ratio deviation request including a plan for reducing the spare ratio to 20 percent. The plan should include a spreadsheet listing for each bus type, the number of buses, and, for each year until the spare ratio reaches 20 percent, the number of buses to be disposed of, the number of buses to be added, the projected peak requirement, and the projected spare ratio. The plan should also include detailed justifications

for years in which spare ratios exceed 20 percent. If the plan cannot be completed within 90 days, the recipient must report progress in quarterly/annual reports.

8. Maintenance

Basic Requirement: Recipients must keep federally-funded vehicles, equipment, and facilities in good operating condition. Recipients must keep *Americans with Disabilities Act* (ADA) accessibility features on all vehicles, equipment, and facilities in good operating order.

Finding: No deficiencies.

9. Procurement

Basic Requirement: The non-federal entity must use its own documented procurement procedures which reflect applicable state, local, and tribal laws and regulations, and conform to applicable federal law and the standards identified in [2 CFR Part 200](#).

The reviewers examined documentation in the following sampled procurements:

Contract/ Product	Award Date	Amount	Method	Deficiencies
Hydrogen Fuel At Sunset Maintenance Facility (SMF) – Trucked In Liquified	8/16/2022	\$5,700,146.00	Invitation for Bid (IFB)	None
Fleet Camera Replacement	5/1/2022	\$7,933,872.00	Request for Proposals (RFP)	None
Fixed Route Transit Services	3/1/2023	\$674,858,905.00	RFP	None
Hydrogen 60ft Buses	12/1/2022	\$7,660,732.56	RFP	None
Bus Shelters Route Planning Restoration Project Design Services	9/1/2023	\$450,000.00	RFP-Architectural and Engineering (A&E)	None
60-Foot Compressed Natural Gas Low Floor Transit Buses	12/1/2023	\$2,752,880.00	RFP	None

Finding: No deficiencies.

10. Disadvantaged Business Enterprise (DBE)

Basic Requirement: Recipients must comply with [49 CFR Part 26](#) to ensure nondiscrimination in the award and administration of USDOT-assisted contracts. Recipients also must create a level playing field on which DBEs can compete fairly for USDOT-assisted contracts.

Finding: No deficiencies.

11. Title VI

Basic Requirement: The recipient must ensure that no person shall, on the grounds of race, color, or national origin, be excluded from participating in, or be denied the benefits of, or be subject to discrimination under any program or activity receiving federal financial assistance without regard to whether specific projects or services are federally funded. The recipient must ensure that all transit services and related benefits are distributed in an equitable manner.

Finding: No deficiencies.

12. Americans with Disabilities Act (ADA) – General

Basic Requirement: Titles II and III of the *Americans with Disabilities Act* of 1990 provide that no entity shall discriminate against an individual with a disability in connection with the provision of transportation service. The law sets forth specific requirements for vehicle and facility accessibility and the provision of service, including complementary paratransit service.

Finding: No deficiencies.

13. ADA – Complementary Paratransit

Basic Requirement: Under [49 CFR 37.121\(a\)](#), each public entity operating a fixed-route system shall provide paratransit or other special service to individuals with disabilities that is comparable to the level of service provided to individuals without disabilities who use the fixed-route system. “Comparability” is determined by [49 CFR 37.123-37.133](#). Requirements for complementary paratransit do not apply to commuter bus, commuter rail, or intercity rail systems.

Finding: No deficiencies.

14. Equal Employment Opportunity (EEO)

Basic Requirement: The recipient must ensure that no person in the United States shall on the grounds of race, color, religion, national origin, sex, age, or disability be excluded from participating in, or denied the benefits of, or be subject to discrimination in employment under

any project, program or activity receiving federal financial assistance under the federal transit laws.

Finding: No deficiencies.

15. School Bus

Basic Requirement: Recipients are prohibited from providing school bus service in competition with private school bus operators unless the service qualifies and is approved by the FTA Administrator under an allowable exemption. Federally-funded equipment or facilities cannot be used to provide exclusive school bus service.

Finding: No deficiencies.

16. Charter Bus

Basic Requirement: Recipients are prohibited from using the FTA-funded equipment and facilities to provide charter service that unfairly competes with private charter operators. Recipients may operate charter only when the service meets a specified exception defined in rule.

Finding: No deficiencies.

17. Drug Free Workplace Act

Basic Requirement: Recipients are required to maintain a drug free workplace for all award-related employees; report any convictions occurring in the workplace timely; and have an ongoing drug free awareness program.

Finding: No deficiencies.

18. Drug and Alcohol Program

Basic Requirement: Recipients receiving Section 5307, 5309, 5311, or 5339 funds that have safety-sensitive employees must have a drug and alcohol testing program in place for such employees.

Finding: No deficiencies.

19. Section 5307 Program Requirements

Basic Requirement: The recipient must participate in the transportation planning process in accordance with FTA requirements and the metropolitan and statewide planning regulations.

Recipients shall develop, publish, afford an opportunity for a public hearing on, and submit for approval, a program of projects (POP).

Recipients are expected to have a written, locally developed process for soliciting and considering public comment before raising a fare or carrying out a major transportation service reduction.

For fixed-route service supported with [Section 5307](#) assistance, fares charged to seniors, persons with disabilities, or an individual presenting a Medicare card during off peak hours will not be more than one half the peak hour fares.

Finding: No deficiencies.

20. Section 5310 Program Requirements

Basic Requirement: Recipients must expend [Section 5310](#) funds on eligible projects that meet the specific needs of seniors and individuals with disabilities. Projects selected for funding must be included in a locally developed, coordinated public transit-human services transportation plan. Recipients must approve all subrecipient leases of Section 5310-funded vehicles. Leases of Section 5310-funded vehicles must include required terms and conditions. Either the recipient or subrecipient must hold the title to the leased vehicles.

Finding: No deficiencies.

21. Section 5311 Program Requirements

Basic Requirement: States must expend [Section 5311](#) funds on eligible projects to support rural public transportation services and intercity bus transportation.

Finding: Not Applicable. This section only applies to recipients that receive Section 5311 funds directly from FTA.

22. Public Transportation Agency Safety Plan (PTASP)

Basic Requirement: Recipients must comply with the [Public Transportation Agency Safety Plan \(PTASP\)](#) regulation ([49 CFR Part 673](#)) to ensure public transportation providers develop and implement an Agency Safety Plan (ASP).

Finding: No deficiencies.

23. Cybersecurity

Basic Requirement: Recipients that operate rail fixed guideway public transportation systems must certify compliance with the requirements for establishing a cybersecurity process under

49 U.S.C. § 5323(v), a new subsection added by the [National Defense Authorization Act for Fiscal Year 2020, Pub. L. 116-92, § 7613 \(Dec. 20, 2019\)](#).

Finding: Not Applicable. This section only applies to recipients that operate rail fixed guideway public transportation systems.

V. Participants

Name	Title	Phone Number	E-mail Address
RTC			
MJ Maynard	Chief Executive Officer	702-676-1778	maynardm@rtcsonv.com
David Swallow	Deputy Chief Executive Officer	702-676-1616	swallowd@rtcsonv.com
Angela Torres-Castro	Deputy Chief Executive Officer	702-676-1552	CastroA@rtcsonv.com
Marc Traasdahl	Chief Financial Officer	702-676-1631	traasdahlm@rtcsonv.com
Julio Ortiz	Senior Director Fleet Maintenance and Administration	702-676-1972	OrtizJ@rtcsonv.com
Roger Johnson	Director Fleet Maintenance and Technical Equipment	702-676-1639	JohnsonRO@rtcsonv.com
David Clyde	Chief Legal Officer	702-676-1561	clyded@rtcsonv.com
Patrick Caddick	Associate Counsel	702-676-1712	CaddickP@rtcsonv.com
Marin DuBois	Government Affairs Supervisor	702-676-1836	DuboisM@rtcsonv.com
Sherwin Gutierrez	Senior Director Finance	702-676-1509	gutierrezs@rtcsonv.com
Liza Angela Jee	Manager Finance	702-676-1929	jeel@rtcsonv.com
Michelle Whitney	Manager Revenue Operations		whitneym@rtcsonv.com
Lisa Bean	Finance Supervisor	702-676-1546	BeanL@rtcsonv.com
Angela Brookins	Senior Financial Analyst	702-676-1901	BrookinsA@rtcsonv.com
Andrew Kjellman	Senior Director Metropolitan Planning Organization	702-676-1662	kjellmana@rtcsonv.com
Nathan Goldberg	Manager Transportation Planning	702-676-1508	GoldbergN@rtcsonv.com
Mohammad Farhan	Principal Transportation Planner	702-676-1736	farhanm@rtcsonv.com
Rush Wickes	Senior Transportation Planner	702-676-1708	WickesR@rtcsonv.com
Mallory Cyr	Director Purchasing Contracts & Agendas	702-676-1536	CyrM@rtcsonv.com
Tonita Brown	Purchasing & Contracts Supervisor	702-676-1507	BrownT@rtcsonv.com
David Gloria	Purchasing & Contracts Analyst/DBE Liaison	702-676-1623	GloriaD@rtcsonv.com
Sue Christiansen	Manager Marketing/Media Relations	702-676-1891	ChristiansenS@rtcsonv.com
Dachresha Harris	Senior Director Human Resources / EEO Officer	702-676-1514	harrisd@rtcsonv.com
Tania Williams	Manager Human Resources	702-676-1810	Williamsta@rtcsonv.com
Bebe Razack	Senior HR Generalist	702-676-1545	razackb@rtcsonv.com

Name	Title	Phone Number	E-mail Address
Antonette Braddock	Senior Director of Paratransit & Specialized Services	702-676-1860	braddocka@rtcscnv.com
Kenneth Rodriguez	Manager Customer Care	702-676-1523	rodriguezr@rtcscnv.com
Terri Reed	Manager Paratransit Operations	702-676-1813	ReedT@rtcscnv.com
Tonya Pagano	Manager Paratransit Operations	702-676-1556	paganot@rtcscnv.com
Angela Budavari	ADA Certification Supervisor	702-676-1728	BudavariA@rtcscnv.com
Jill DeLuca	Customer Care Supervisor	702-676-1742	deluccaj@rtcscnv.com
Sabrina Glenn	Senior Director Transit Services	702-676-1684	GlennSA@rtcscnv.com
Wycliffe Mudambi	Manager Transit Operations	702-676-1994	MudambiW@rtcscnv.com
Jonathan Jones	Manager Transit Services (Transdev Contract)	702-676-1622	JonesJo@rtcscnv.com
Aileen Pastor	Manager Quality Assurance, Partnerships & Events	702-676-1735	PastorA@rtcscnv.com
Jacob Simmons	Transit Planning Supervisor	702-676-1890	simmonsj@rtcscnv.com
Thomas Atteberry	Director of Safety & Security	702-676-1865	AtteberryT@rtcscnv.com
Judy Lopez	Manager Safety & Security Operations	702-676-1522	LopezJ@rtcscnv.com
Robert Palumbo	Safety & Security Compliance Supervisor	702-676-1909	PalumboR@rtcscnv.com
Allen Hayes	Senior Director of Facilities & Transit Amenities	702-676-1720	HayesA@rtcscnv.com
Royal Alexander	Manager Transit Amenities	702-676-1637	AlexanderRO@rtcscnv.com
Marc Maesaka	Facilities & Maintenance Supervisor	702-676-1519	maesakam@rtcscnv.com
Shane Wunder	Facilities & Fleet Maintenance Supervisor (NRV)	702-676-1502	WunderS@rtcscnv.com
Brij Gulati	Director Capital Projects	702-676-1734	gulatib@rtcscnv.com
Transdev			
Robert Graham	Director of Maintenance	281-802-9014	Robert.Graham2@transdev.com
Paul Robedeau	Maintenance Manager	725-994-6551	Paul.Robedeau@transdev.com
MV Transit			
Rick Knick	Maintenance Manager	951-378-2587	Rick.Knick@mvtransit.com
Jacobs Engineering			
Luis Palor	Program Manager/Quality Assurance	702-676-1674	PalorL@rtcscnv.com
Bill Tsiforas	Subconsultant	702-676-1568	tsiforas@rtcscnv.com
Jesus Marmolejo	Construction Manager	702-676-1564	Marmolejo2@rtcscnv.com
FTA Region 9 Office			
Ray Tellis	Regional Administrator	415-734-9471	ray.tellis@dot.gov
Amy Changchien	Deputy Regional Administrator	415-734-9455	amy.changchien@dot.gov

Name	Title	Phone Number	E-mail Address
Karin Vosgueritchian	Regional Civil Rights Officer	415-734-9475	karin.vosgueritchian@dot.gov
Stephanie Gauthier-Phillips	Program Manager, FTA HQ Office of Civil Rights	415-734-9465	s.gauthier-phillips@dot.gov
Darin Allan	Director, Office of Financial Management and Program Oversight (OFM)	415-734-9470	darin.allan@dot.gov
Philoki Barros	Review Coordinator & Transportation Program Specialist, OFM	415-734-9452	philoki.barros@dot.gov
Catherine Luu	General Engineer, Bay Area Office (BAO)	415-734-9467	catherine.luu@dot.gov
Elba Lira-Martinez	Grants Management Specialist, OFM	415-734-9463	Elba.Lira-Martinez@dot.gov
Team TFC			
Benjamin Sumpter	Lead Reviewer	737-787-3916	bsumpter@csi-compliance.com
Erick Wilkes	Associate Reviewer	737-787-4267	ewilkes@csi-compliance.com

Appendix

FTA Circular 5010.1E, Ch. IV, Section 4. Equipment and Supplies (Including Rolling Stock)

k. Rolling Stock Spare Ratio Policies. Spare ratios will be taken into account in the review of Award proposed to replace, rebuild, or acquire additional vehicles. Spare ratio is defined as the total number of spare vehicles available for fixed-route service (regardless of type) divided by the total number of fixed-route vehicles required for annual maximum service (regardless of type). Spare ratio is usually expressed as a percentage, e.g., 100 vehicles required for maximum fixed-route service and 20 spare vehicles is a 20 percent spare ratio. Spare ratios are calculated for the transit system as a whole, not by vehicle type.

For purposes of the spare ratio calculation, “vehicles operated in maximum fixed-route service” is defined as the total number of revenue vehicles operated to meet the annual maximum service requirement. This is the revenue vehicle count during the peak week, day, and hours maximum service is provided. It excludes atypical days and special events.

- (1) Bus Fleet. The basis for determining a reasonable spare bus ratio takes local circumstances into account. The number of spare buses in the active fleet for recipients operating 50 or more fixed-route revenue vehicles should not exceed 20 percent of the number of vehicles operated in maximum fixed-route service. FTA does not set a specific spare ratio for smaller operators, but expects the number of spare buses to be reasonable, taking into account the number of vehicles and variety of vehicle types and sizes.*

Buses delivered for future expansion and buses that have been replaced, but are in the process of being disposed of, are not included in the calculation of spare ratio.

For each application identified to acquire vehicles, the applicant should address the subjects of current spare ratio, the spare ratio anticipated at the time the new vehicles are introduced into service, disposition of vehicles to be replaced including information on age and mileage, and the applicant’s conformance with FTA’s spare ratio guideline. An applicant is required to notify FTA if the spare ratio computation on which the application is based is significantly altered before the Award is made...

- (3) Spare Ratio Deviation. Recipients of buses recently procured may temporarily exceed their spare ratio thresholds. In those cases, recipients may seek a short-term deviation from the spare ratio requirements for small deviations. Recipients should prepare a brief justification explaining the reason for the deviation, a date by which the fleet spare ratio will come into compliance with the general requirements, and the recipient’s plans to come into compliance. The deviation will generally be granted for no more than two (2) years and must be approved by the regional administrator either in writing or by approval of the Award.*

Recipients must promptly inform the Regional Office of any significant changes related to spare ratios, including plans for disposition or acquisition of vehicles and changes in vehicle needs.