

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

**Rail Safety Division
Rail Transit Safety Branch**

**Resolution ST-230
July 16, 2026**

C O N F I D E N T I A L**R E S O L U T I O N**

Resolution ST-230. Granting Approval of the Final Report on the 2018 Triennial Security Review of the San Francisco Municipal Transportation Agency.

PROPOSED OUTCOME:

- Approval of the Final Report of the 2018 Triennial On-site Security Review of San Francisco Municipal Transit Agency.

SAFETY CONSIDERATIONS:

- This resolution considers the safety and security of the public and employees who might be affected by the San Francisco Municipal Transit Agency. The resolution approves a review report required every three years to comprehensively assess, evaluate, and improve safety and security of a rail transit system.

ESTIMATED COST:

- There are no costs associated with this resolution.

SUMMARY

This resolution approves the California Public Utilities Commission Rail Safety Division final report titled, "*2018 Triennial Security Review of the San Francisco Municipal Transportation Agency.*" dated March 27, 2020. The report compiles the results of Commission Staff review of the San Francisco Municipal Transit Agency (SFMTA) security program. The review identified seven Findings of Non-compliance and Staff made four recommendations for corrective actions. The findings and recommendations

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have been addressed and corrective actions completed. Staff is not recommending that any fines or penalties be assessed by the Commission associated with the results of this triennial security review.

As the report contains confidential, sensitive information protected by Public Utilities Code Section 583, only background information is included in the redacted report, review items and audit activities, findings and recommendations are not.

BACKGROUND

Commission General Order (GO) No. 164-E, "*Rules and Regulations Governing State Safety Oversight of Rail Fixed Guideway Systems*" requires Commission Staff (Staff) to conduct on-site safety¹ and on-site security review of the transit agencies operating rail fixed guideway systems triennially.

From 1996 to 2008, the Commission's Rail Transit Safety Branch (RTSB) partnered with the Transportation Security Administration (TSA) in performing rail transit security reviews. However, in the latter half of 2008, RTSB took over the responsibility of security reviews from the TSA. Staff conducted an on-site security review of the SFMTA system security program in October 2018.

A full description of the system, along with the security review, including the scope, results, and recommendations, is contained in the final security review report identified in this resolution as Attachment A.

Staff found seven non-compliances during the review. Activities of each checklist can be found in Section C of the security report.

Staff sent SFMTA a copy of the draft security review report for a 30-day comment period on December 11, 2019. SFMTA responded electronically with several comments on the draft security review report, on January 10, 2020.

SCOPE OF SECURITY REVIEW

Commission Staff conducted its security review in accordance both with guidance and training from the Federal Transit Administration (FTA). General Order 164-E, Section 4 defines the requirements for a System Security Plan (SSP) for rail transit agencies.

¹ Staff's safety review and report, "*2018 Triennial Safety Review of San Francisco Municipal Transportation Agency*" is being brought before the Commission concurrently in Resolution ST-229.

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According to section 4 of GO 164-E, the SSP must, at a minimum, address the following:

- (a) Identify the policies, goals, and objectives for the security program endorsed by the agency's accountable executive.
- (b) The process for managing threats and vulnerabilities during operations, and for projects, extensions, new vehicles and equipment, including integration with the safety certification process.
- (c) The controls in place that address the personal security of passengers and employees.
- (d) The process for conducting internal security reviews to evaluate compliance and measure the effectiveness of the security plan.
- (e) The process for making the security plan and accompanying procedures available to the Commission for review and approval.
- (f) The process for notifying investigating and reporting security breaches.

GO 164-E Section 4 provides the basis for the six security checklists that guided Staff's review of the SFMTA security program. Staff evaluated the SFMTA's security plans and procedures to determine whether they comply with the requirements of section GO 164-E Section 4. The triennial security review evaluates whether SFMTA has defined necessary security activities, established responsibilities and accountability, set priorities, provided employee training, developed information distribution and controls, and developed monitoring and feedback loops to determine effectiveness of the security plans and procedures.

Each Staff member involved in the security review received training from the FTA. All staff successfully passed the Transit System Security training course, which provides in-depth instruction on the federal security plan requirements, typical methods of compliance, and industry best practices.

Moreover, all Staff in the Rail Transit Safety Branch take the FTA Rail System Security course as part of their overall training. This allows Staff members, out in the field, to identify security concerns at all times when conducting general oversight activities or inspecting transit agency facilities and operations, not just during the triennial security review period. Staff evaluates and identifies security issues in the field, which are immediately discussed with the appropriate transit agency personnel to initiate the process for addressing the concern.

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The final report, *"2018 Triennial Security Review of the San Francisco Municipal Transportation Agency,"* dated March 27, 2020, included as Attachment A, identifies Staff's activities for each of the six security elements evaluated during the security review.

For the purpose of the security reviews, "security" means the general areas identified in the requirements of GO 164-E Section 4. Staff inquiries during the review examine whether the processes and procedures SFMTA adopted are implemented in accordance with the General Order and the SFMTA SSP. Staff do not evaluate SFMTA's response to specific crimes or events, except during evaluations to ensure processes and procedures in place are implemented as intended. Specific crimes and criminal behavior that may occur on trains and stations are considered outside of scope of the review and are handled by the local jurisdiction's police department.

Staff recommends the Commission approve the final security review report titled, *"2018 Triennial Security Review of the San Francisco Municipal Transportation Agency,"* dated March 27, 2020.

COMMENTS

Public Utilities Code section 311(g)(1) provides that this Resolution must be served on all parties and subject to at least 30 days public review. Any comments are due within 20 days of the date of its mailing and publication on the Commission's website and in accordance with any instructions accompanying the notice. Section 311(g)(2) provides that this 30-day review period and 20-day comment period may be reduced or waived upon the stipulation of all parties in the proceeding.

The 30-day review and 20-day comment period for the draft of this resolution was neither waived nor reduced. Accordingly, this draft resolution was mailed to parties for comments and will be placed on the Commission's agenda no earlier than 30 days from today. ___ comments were received.

FINDINGS AND CONCLUSIONS

1. The Rail Safety Division RTSB staff conducted an on-site security review of SFMTA in October 2018. Staff conducted a post-review exit conference with SFMTA management to discuss preliminary findings on September 19, 2019.

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2. The inquiries and activities conducted for each security area covered during the review are described in the individual review checklists in the final report included as Attachment A to this Resolution.
3. Seven (7) Findings of Non-compliance were identified during the security review resulting in four (4) recommendations for corrective action. Findings and recommendations for corrective actions are described, in the Comments/Findings and Recommendations section of the corresponding checklist and in the body of the final report.
4. SFMTA has developed and implemented corrective action plans for of the areas of non-compliance identified in the report and all of the findings and recommendations contained in the report have been closed out to Staff's satisfaction.

THEREFORE, IT IS ORDERED THAT:

1. The Rail Safety Division's request for approval of the final security review report titled, *"2018 Triennial Security Review of San Francisco Municipal Transportation Agency,"* dated March 27, 2020, is granted.
2. This resolution is effective today.

I certify that the foregoing resolution was duly introduced, passed, and adopted at a conference of the Public Utilities Commission of the State of California held on July 16, 2026; the following Commissioners voting favorably thereon:

Commissioner Signature blocks to be added
upon adoption of the resolution

Dated ____//____, at San Francisco, California

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ATTACHMENT A

2018 Triennial Security Review Report of
San Francisco Municipal Transportation Agency

CS# 608785850

<http://docs.cpuc.ca.gov/SearchRes.aspx?docformat=ALL&DocID=608785850>