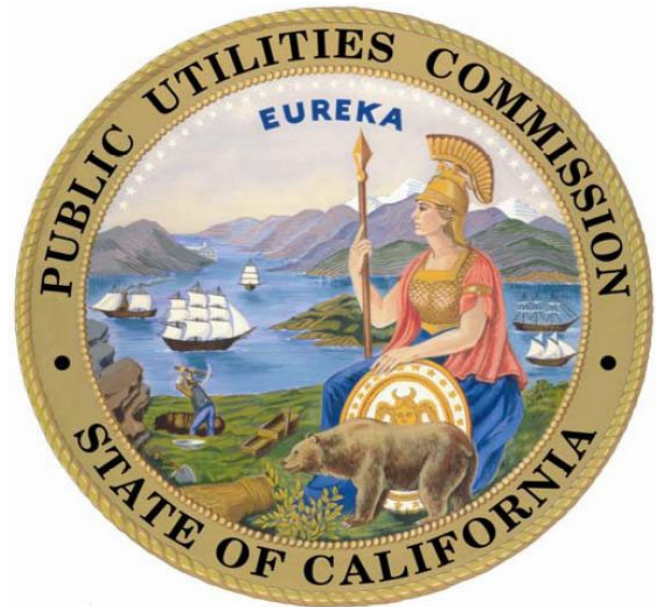

2022

TRIENNIAL SECURITY REVIEW OF SANTA CLARA VALLEY TRANSPORTATION AUTHORITY

RAIL TRANSIT SAFETY BRANCH
RAIL SAFETY DIVISION
CALIFORNIA PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102

Final Report
November 29, 2022



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Rail Transit Safety Branch
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2022 TRIENNIAL SECURITY REVIEW OF SANTA CLARA VALLEY TRANSPORTATION AUTHORITY

ACKNOWLEDGEMENT

The California Public Utilities Commission's Rail Transit Safety Branch (RTSB) staff conducted this system security program review. Staff members directly responsible for conducting the security review and activities include:

Joey Bigornia – Utilities Engineer
Rupa Shitole – Utilities Engineer

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1. EXECUTIVE SUMMARY

The California Public Utilities Commission's (CPUC or Commission) Rail Safety Division (RSD), Rail Transit Safety Branch (RTSB) staff (Staff) conducted an on-site system security program review of the Santa Clara Valley Transportation Authority (VTA) on April 21, 2022. Such reviews are conducted for each California rail transit agency every three years and focus on verifying the effective implementation of the System Security Plan (SSP) version 5 dated January 2020, addressing Threat & Vulnerability Assessment (TVA) and emergency response. This report details staff's investigatory actions, findings, and recommendations. The review revealed no areas of non-compliance, as discussed below.

On Monday, April 18, 2022, VTA personnel and Staff met for an opening conference, which preceded the on-site review activities. On Thursday, April 21, 2022, Staff conducted the 2022 VTA triennial on-site security review. A post-review conference meeting occurred on Wednesday, July 20, 2022, with Staff providing VTA personnel with a summary of their review. The results indicate that VTA has a comprehensive SSP, which it has carried out effectively for the years reviewed. Staff identified no findings of non-compliance and issued no recommendations for corrective action.

Section 2 (Introduction) provides a summary of the authority under which the Commission performs triennial reviews and presents a brief chronology of the review. Section 3 (Background) includes a description of VTA's system. Section 4 (Security Review Procedure) explains the procedures used by Staff during the System Security Review. Staff's findings of non-compliance and recommendations are presented in Section 5 (Findings and Recommendations), organized by source checklist numbers. Finally, the Appendices include a list of abbreviations and acronyms used in the report and checklists, tabulated findings and recommendations, and the complete set of the five security review checklists with summaries of all review activities and the original comments, findings, and recommendations.

This report reflects Staff's triennial security review of VTA. The VTA on-site triennial safety review report is contained in a separate report and is brought before the Commission for approval in a separate Resolution.¹

¹ Staff's safety review and report, the "2022 Triennial Safety Review of Santa Clara Valley Transportation Authority," is being brought before the Commission concurrently in Resolution ST-252.

2. INTRODUCTION

The Commission's General Order (GO) 164-E *Rules and Regulations Governing State Safety Oversight of Rail Fixed Guideway Systems*, Section 4, *Requirements for System Security Plans* and the Federal Transit Administration's (FTA) Rule, Title 49 Code of Federal Regulations (CFR) Part 659 (renumbered to 49 CFR 674), *Rail Fixed Guideway Systems: State Safety Oversight*, each require the designated State Safety Oversight Agencies to perform a review of each rail transit agency's system security program at a minimum of once every three years. The triennial review verifies compliance and evaluates the effectiveness of each rail transit agency's System Security Plan (SSP)—in this case the VTA SSP — to assess the level of compliance with GO 164-E and other Commission safety and security requirements.

Staff conducted the previous VTA on-site security review in November 2017. Due to the COVID-19 pandemic which essentially began in the first months of 2020, on-site triennial safety and security reviews were suspended during 2020 until late 2022. Commission authorization for delaying and rescheduling the triennials was issued under Resolution ST-241.

On March 18, 2022, staff emailed a letter to VTA's Accountable Executive, advising that the Commission's security review had been scheduled beginning April 18, 2022. The letter included five checklists that served as the basis for verification of the effective implementation of VTA's SSP.

Staff conducted an opening conference on April 18, 2022, with members of VTA's executive management team, directors, and superintendents.

Staff performed the on-site triennial security review at the VTA River Oaks office location. Staff developed five (5) checklists for the inspection of the System Security Program. Staff derived the checklist review questions from CPUC's GO 164-E, FTA's 49 CFR 659 guidance, Transportation Security Administration's (TSA) Baseline Security Review, and VTA's SSP. At the conclusion of each review activity, staff provided VTA personnel with a verbal summary of the preliminary findings and discussed preliminary recommendations for corrective action.

On July 20, 2022, Staff conducted a post-review exit meeting with VTA's management team. Staff provided the attendees with a summary of the findings and staff comments derived from the five checklists used to guide the review. No

findings of non-compliance were identified, and no recommendations were issued.

3. BACKGROUND

The Santa Clara Valley Transportation Authority (VTA) is an independent special transit district that provides transit services to the region, including rail transit service. VTA provides bus, light rail, and paratransit services, as well as participates as a funding partner in regional rail service including Caltrain, Capitol Corridor, and the Altamont Corridor Express. As the county's congestion management agency, VTA is responsible for countywide transportation planning, including congestion management, design and construction of specific highway, pedestrian, and bicycle improvement projects, as well as promotion of transit-oriented development.

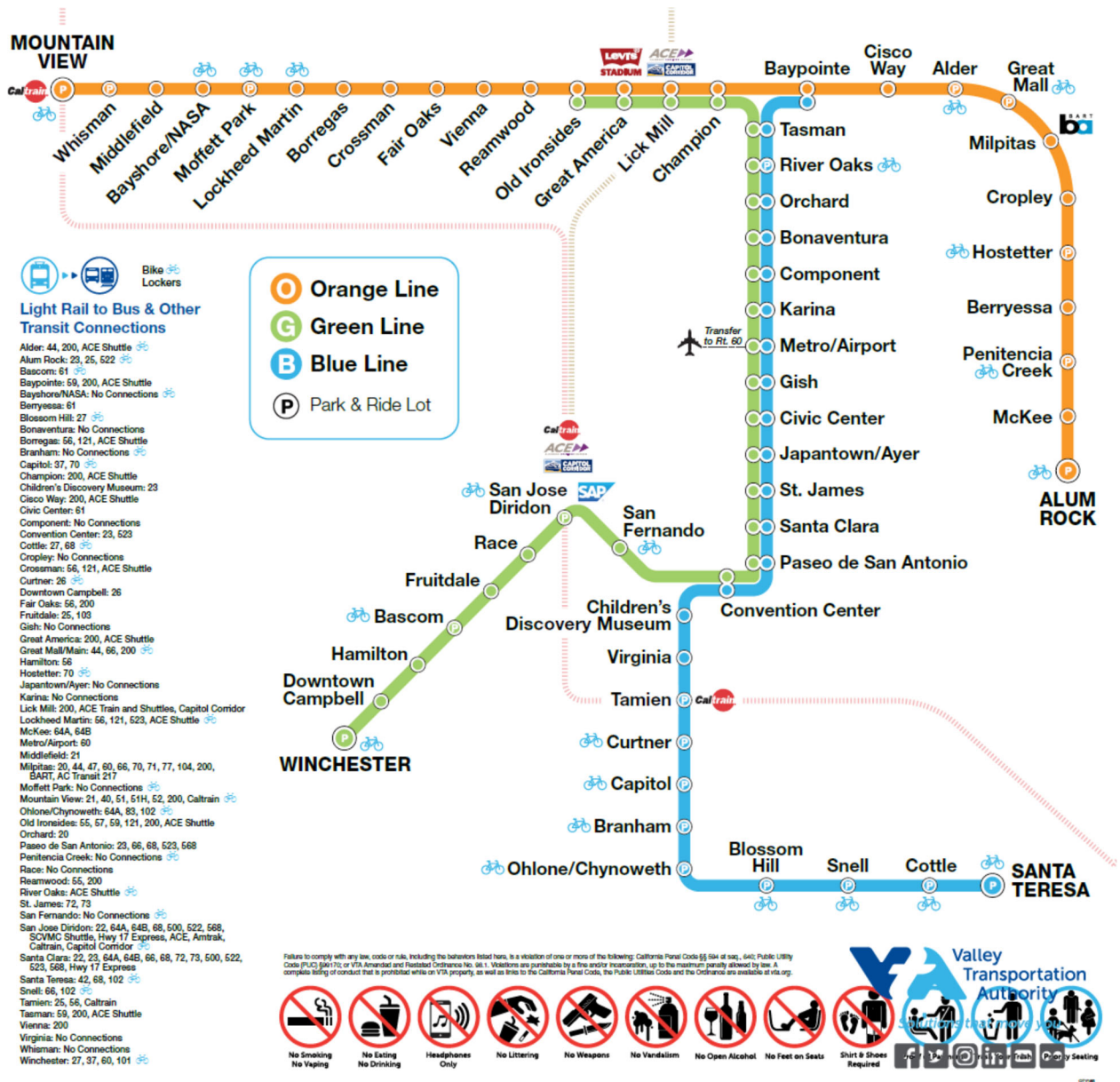
The Board of Directors has 18 members, including six ex-officio members, all of whom are elected officials appointed to serve on the Board by the jurisdictions they represent. Fifteen Directors are city council members and three are county Supervisors. Twelve Directors serve as voting members and there are six Directors who serve as alternates. The ex-officio members are non-voting members and three of them represent Santa Clara County on the Metropolitan Transit Commission (MTC).

VTA currently operates an urban transit service with a fleet of diesel, hybrid diesel-electric buses and light rail vehicles within Santa Clara County. VTA's service coverage is 346 square miles, serving 15 cities in Santa Clara County with a population of nearly 2 million. Historic trolley service is also provided in the downtown San Jose Transit Mall on a seasonal basis.

VTA Rail System

The VTA rail system consists of the Blue, Green and Orange Lines (See VTA Light Rail System Map) with two other proposed extensions. The total operating system is about 42.2 miles with 59 Light Rail Stations. The average weekday ridership of the light rail system was approximately 7,232 passengers per day in Fiscal Year 2021. The restructuring of light rail lines and the Blue, Green and Orange Line designations began in late 2019.

VTA LIGHT RAIL SYSTEM MAP (October 2022)



Blue Line

The 16.7-mile Blue Light Rail Line operates north-south from south San Jose, into downtown and continues to employment centers of north San Jose. The Downtown Transit Mall in San Jose serves as a hub for rail/bus connections.

Light Rail and Caltrain service connect at the Tamien Station in San Jose. The Blue Line has 26 light rail stations.

Green Line

The 13.9-mile Green Light Rail Line operates north-south from Campbell to San Jose and Santa Clara. It overlaps the Blue Line between downtown San Jose and north San Jose. The Downtown Transit Mall in San Jose serves as a hub for rail/bus connections. Light rail and Caltrain service connect at the Diridon Station in San Jose. Levi's Stadium is located near the Great America Light Rail Station. The Green Line has 26 light rail stations.

Orange Line

The 17.7-mile Orange Light Rail Line operates east-west from Mountain View to Alum Rock, with a major transfer point at Baypointe to the Blue Line. Light rail and BART service connects at the Milpitas Station, while the Caltrain connection is at Mountain View. Levi's Stadium is located near the Great America Light Rail Station. The Orange Line has 26 light rail stations.

Vasona Corridor (Part of Green Line)

The Vasona Corridor is a 5.3-mile light rail extension to the existing VTA Light Rail system and operates primarily on the existing Union Pacific Railroad right-of-way. Revenue service began in 2005. The Vasona Line has 8 light rail stations and links with Caltrain, ACE, and Capitol Corridor at Diridon Station. This is an FRA shared corridor starting just beyond Diridon Station to Winchester. Union Pacific and VTA do not share or cross tracks in this corridor. A five (5) years extension waiver is in place dated October 6, 2020 (Docket Number FRA 1999-6254).

VTA's BART Silicon Valley Extension -Phase I

The BART Silicon Valley Extension Project is a 16-mile extension of the BART system to Santa Clara County that is being funded and constructed to BART standards by VTA. VTA will continue to own the assets it funds and constructs, however BART will independently operate the extension of its system. Phase I, the Berryessa Extension, is a 10-mile extension, including two BART stations. This extension begins in Fremont, south of the Warm Springs/South Fremont BART Station, and proceeds along the former Union Pacific Railroad Company right-of-way through Milpitas, the location of the first station, to the Berryessa area of North San Jose, the location of the second station. The Berryessa

Extension (Phase I) is now in revenue service, having begun June 13, 2020.

Current Extensions in planning/construction

Eastridge to BART Regional Connector Project

The Eastridge to BART Regional Corridor Project is a 2.6-mile extension from the existing Alum Rock Station to Eastridge Transit Center. The alignment will be primarily grade-separated at all intersections. The Project is being implemented in phases. Phase I was completed in the Spring of 2015 and included the installation of sidewalk, landscaping, and street lighting on Capital Expressway from Capital Avenue to Tully Road and the reconfiguration of the Eastridge Transit Center. Phase 2 will extend light rail from the existing Alum Rock Light Rail Station to the Eastridge Transit Center. Light rail will operate primarily in the center of Capitol Expressway in an elevated track structure from Capitol Avenue to Tully Road. The Eastridge extension will include two stations: Story and Eastridge. Utility relocation is underway and is expected to be completed in mid-2023. Final engineering is reaching completion with the final bid set anticipated to be completed in mid-2023. Pending funding availability, construction advertisement can begin by late 2023 with construction completion in 2029. The SSCP was approved by the CPUC in Resolution ST-88 (5/24/2007), however, VTA provided an updated revision of the SSCP in early 2020 and CPUC reviewed and approved the revision in July 2020.

Vasona Junction Light Rail Extension

Plans include a 1.5-mile extension from Winchester Station into Los Gatos. A Federal environmental document for the Vasona Light Rail Extension was completed and approved by the Federal Transit Administration (FTA). The schedule for engineering work will resume once funding is available.

BART Silicon Valley Extension Project – Phase II

The BART Silicon Valley Extension Project is a 16-mile extension of the BART system to Santa Clara County that is being funded and constructed to BART standards by VTA. VTA will continue to own the assets it funds and constructs, however BART will independently operate the extension of its system. Phase I (10 miles) began revenue service in June 2020.

VTA is completing design and engineering for Phase II (6 miles) of the BART Silicon Valley Extension, which includes a subway tunnel through downtown San Jose, four stations and a Newhall Yard Maintenance Facility in Santa Clara. Major construction of the second phase is expected to begin in 2024 with passenger service targeted for 2036. The SSCP for this project was submitted by BART and was approved by the CPUC in Resolution ST-83 (2/15/2007). On June 16, 2021, Staff received the project SCP for phase II, and CPUC approval was sent on August 17, 2021, approving the SCP.

VTA Security Background

VTA asserts that effective security on VTA's transit system is achieved by having a highly visible security presence to protect transit customers, employees, contractors, and property. System-wide security is provided by a combination of the County of Santa Clara Office of the Sheriff and San Jose Police Department deputies and private security officers. VTA also has a Fare Inspection Unit that requests proof of payment from passengers riding VTA's light rail system.

Currently, under the direction of VTA's Chief of System Safety and Security, VTA's law enforcement services are provided under contract with the County of Santa Clara Office of the Sheriff and San Jose Police Department – Transit Patrol Division. VTA has contracted with the County of Santa Clara Office of the Sheriff for law enforcement services since October 1990 and the San Jose Police Department since June 2020. Deputies and Police Officers are on duty 24 hours a day and respond to calls for service from armed and unarmed private security officers, Fare Inspectors, Bus and Light Rail Operators and other VTA employees through VTA's Operations Control Center (OCC), as well as from passengers using the 911 system.

Universal Protection Services, LP, dba Allied Universal Security Services, is currently VTA's private security contractor providing unarmed and armed security. Allied Universal Security Services has provided contract security services to VTA since March 2009. Security officers are assigned to posts or beats, based on ridership patterns, activities and statistical crime data. Unarmed security officers are assigned to all VTA work facilities and selected transit facilities. These officers also support special events serviced by VTA and may ride light rail trains and buses to provide a visible security presence. Armed security officers patrol VTA facilities and light rail stations. Furthermore, they

support security by managing its Lost and Found program, CCTV programs and providing revenue collection services.

In addition to Transit Patrol and contract security, VTA also has a team of Fare Inspectors that randomly board the light rail trains to enforce VTA's fare policy throughout the system. This team works closely with law enforcement and contract security.

Status of the 2017 VTA Triennial Security Review Recommendations

Staff performed the previous triennial on-site security review in 2017. During that review, Staff identified no Findings or Recommendations. In CPUC Resolution ST-209, adopted May 30, 2019, the Commission granted approval of Staff's final 2017 VTA Triennial Security Review report.

4. SECURITY REVIEW PROCEDURE

Scope of Security Review

Commission Staff conducted its security review in accordance with the guidance and training from the Federal Transit Administration (FTA) and with Title 49 CFR 659.² Section 659.23 of the Code of Federal Regulations (renumbered to 49 CFR 674.29) defines the requirements for a System Security Plan (SSP) for rail transit agencies.

According to 49 CFR § 659.23, the system security plan must, at a minimum, address the following:

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

The requirements of section 659.23 serve as the basis for the five security checklists guiding Staff's review of the VTA security program. Staff evaluated VTA's security plans and procedures to determine whether they meet the requirements of section 659.23. The triennial security review evaluated whether

² **49 CFR Part 659** officially sunset on **February 7, 2022**, when the Federal Transit Administration (FTA) published its final rescission in the [Federal Register](#), however CPUC Staff still follow its guidance. The regulation was replaced by the updated State Safety Oversight rule codified at 49 CFR Part 674, which was required by the Moving Ahead for Progress in the 21st Century Act (MAP-21). [[1](#), [2](#)]

VTA 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.

For the purpose of the security reviews, “security” means the general areas identified in the FTA requirements of section 659.23. Staff inquiries during the review examine whether the processes and procedures VTA adopted are implemented in accordance with statute and the VTA SSP. Staff does not evaluate VTA’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 handled by the local law enforcement departments within that jurisdiction.

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

Moreover, all Staff in the Rail Transit Safety Branch take the FTA’s Rail System Security course as part of their overall training. This allows Staff members out in the field to always identify security concerns 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.

Review Procedure

Staff conducted the 2022 security review in accordance with Rail Transit Safety Branch Program Standard Procedure RTSB-4, *Procedure for Performing On-Site Triennial Safety and Security Reviews of Rail Transit Systems*, and G.O. 164-E, Section 4, *Requirements for System Security Plans*. Staff developed five (5) checklists to cover various aspects of system security responsibilities based on Commission and FTA requirements (49 C.F.R § 674.27, et seq., VTA’s SSP, security related VTA documents, Department of Homeland Security, the Transportation Security Administration’s (TSA) baseline review list, TSA “sensitive security information (49 C.F.R. § 1520 et seq.), and Staff’s prior

knowledge of VTA's operations. A list of the five checklists is provided in Appendix B. The completed checklists are shown in Appendix D.

Each checklist identifies security-related elements and characteristics that were either inspected or reviewed by Staff. Each checklist references Commission, VTA, and other documents that establish the security program requirements. The methods used to perform the review include:

- Discussions and interviews with VTA Security personnel.
- Review of rules, procedures, policies, and records.
- Interviews with rank-and-file employees.

Immediately following the security review, Staff summarized their findings and preliminary recommendations (if appropriate) with involved VTA personnel. The post-review summary aims to clarify Staff's findings and provides VTA with an opportunity to promptly address any necessary security improvements.

5. FINDINGS AND RECOMMENDATIONS

The reviewers who participated in the On-Site System Security Review identified no findings of non-compliance and made no recommendations to VTA regarding its system security program and its implementation. The review results are derived from documents reviewed and issues discussed with VTA personnel.

The following are the findings and recommendations for each checklist:

1. Identify Policies, Goals, and Objectives

No findings of non-compliance; no recommendations.

2. Process for Management of Threats and Vulnerabilities Assessments

No findings of non-compliance; no recommendations.

3. ID Concepts for Passenger and Employee Security

No findings of non-compliance; no recommendations.

4. Process for Internal Security Audit Reviews

No findings of non-compliance; no recommendations.

5. Process for Updating/Generating its Security Plan

No findings of non-compliance; no recommendations.

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APPENDIX A
ABBREVIATIONS & ACRONYMS LIST

Abbreviation / Acronym	Description
CAP	Corrective Action Plan
CA MUTCD	California Manual on Uniform Traffic Control Devices
CFR	Code of Federal Regulations
Commission	California Public Utilities Commission
CPUC	California Public Utilities Commission
FTA	Federal Transit Administration
GO	General Order
HOS	Hours of Service
IIPP	Injury and Illness Prevention Program
ISSA	Internal Safety and Security Audit
OCC	Operations Control Center
PHA	Preliminary Hazard Analysis
PM	Preventive Maintenance
RSD	Rail Safety Division
RTSB	Rail Transit Safety Branch
SCP	Safety Certification Plan
SCVR	Safety Certification Verification Report
SEPP	Security and Emergency Preparedness Program Plan
SSP	System Security Plan
SSPP	System Safety Program Plan
PTASP	Public Transportation Agency Safety Plan
Staff	RSD personnel (CPUC)
VTAA	Santa Clara Valley Transportation Authority
TSA	Transit Security Administration
TVA	Threat and Vulnerability Assessment

APPENDIX B
MTA 2022 TRIENNIAL SECURITY REVIEW CHECKLISTS INDEX

- 1 Identify Policies, Goals, and Objectives
- 2 Process for Management of Threat and Vulnerability Assessments (TVA)
- 3 ID Concepts for Passenger and Employee Security
- 4 Process for Internal Security Audit Reviews
- 5 Process for Updating/Generating its Security Plan

APPENDIX C
VTA 2022 TRIENNIAL SECURITY REVIEW RECOMMENDATION LIST

No.	Recommendations	Checklist No.
	None.	

APPENDIX D

VTA 2022 TRIENNIAL SECURITY REVIEW CHECKLISTS

2022 CPUC SYSTEM SECURITY REVIEW CHECKLIST FOR SANTA CLARA VALLEY TRANSPORTATION AUTHORITY (VTA)

Checklist No.	1	Element	Identify Policies, Goals, and Objectives
Date of Audit	April 21, 2022 08:00-16:30	Department(s)	Protective Services
Auditor/Inspector	Joey Bigornia	Persons Contacted	Octavio Garcia, Security Manager Bethany Cramer, Senior Management Analyst Nathan Sims, Associate Management Analyst

REFERENCE CRITERIA

1. General Order 164-E
2. System Security Plan (SSP), dated January 2020

ELEMENT/CHARACTERISTICS AND METHOD OF VERIFICATION

Identify Policies, Goals, and Objectives

Interview the person(s) in charge of Security Policies, Goals and Objectives at VTA. Review and evaluate the various documents as indicated below for the past five years to determine if:

1. The VTA SSP is certified by VTA General Manager, Chief of System Safety and Security, Manager of Security Programs, and the Captain – Transit Patrol Division;
2. VTA identifies, and then eliminates, minimizes, or controls security breaches or hazards on VTA property;
3. VTA heightens security awareness among all employees, contractors, and passengers;
4. VTA achieves a level of security performance and emergency readiness that meets or exceeds the operating experience of similarly sized agencies around the nation; and
5. VTA increases and strengthens community involvement and participation in the safety and security of the transit system.

FINDINGS AND RECOMMENDATIONS

Activities:

Staff interviewed VTA Security Staff responsible for Identifying Policies, Goals, and Objectives and determined the following:



[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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2022 CPUC SYSTEM SECURITY REVIEW CHECKLIST FOR SANTA CLARA VALLEY TRANSPORTATION AUTHORITY (VTA)

Checklist No.	2	Element	Process for Management of Threats and Vulnerabilities
Date of Audit	April 21, 2022 08:00-16:30	Department(s)	Protective Services
Auditor/Inspector	Joey Bigornia	Persons Contacted	Octavio Garcia, Security Manager Bethany Cramer, Senior Management Analyst Nathan Sims, Associate Management Analyst

REFERENCE CRITERIA

1. General Order 164-E
2. System Security Plan (SSP), dated January 2020

ELEMENT/CHARACTERISTICS AND METHOD OF VERIFICATION

Process for Management of Threats and Vulnerabilities

Interview the VTA representatives responsible for the Security Enforcement of Threat and Vulnerabilities. Review the SSP and TVA related documents for the past five years to determine if:

1. VTA promotes analysis and methodologies that encourage safe system operation through identification, evaluation, and resolution of threats and vulnerabilities, including preparedness for acts of terrorism that could involve weapons of mass of destruction, and the ongoing assessment of agency capabilities and readiness;
2. VTA identifies threats from internal and external information resources stated in section 6.4.1;
3. VTA develops and implements a Risk Mitigation Process/Program, and based on the issues/results of this program, VTA develops and implements appropriate measures to reduce the risk's threat action for improving physical security measures and emergency response capabilities by:
 - a. Cataloging and prioritizing VTA's assets and infrastructure;
 - b. Identifying and evaluating threats to those assets;
 - c. Identifying vulnerabilities based on the assets and likely threats; and
 - d. Developing, prioritizing, and implementing mitigation measures to reduce the risk to VTA assets;
4. On an annual basis, the Chief of System Safety and Security, or designee will determine whether there is need for full TVA;

5. VTA has conducted a full TVA within the past five years and if the proposed countermeasures were tracked unto completion by the Director of System Safety and Security and the Captain –Transit Patrol Division;
6. VTA continues to share security information at the System Safety and Security staff meetings, including results and recommended action items to be implemented; and
7. VTA conducts regular testing and inspections of its facilities and assets including penetration testing on average every other month.

FINDINGS AND RECOMMENDATIONS

Activities:

Staff interviewed the VTA representatives responsible for the Security Enforcement of Threat and Vulnerabilities and determined:

[REDACTED]

[REDACTED]

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2022 CPUC SYSTEM SECURITY REVIEW CHECKLIST FOR SANTA CLARA VALLEY TRANSPORTATION AUTHORITY (VTA)

Checklist No.	3	Element	ID Concepts for Passenger and Employee Security
Date of Audit	April 21, 2022 08:00-16:30	Department(s)	Protective Services
Auditor/Inspector	Joey Bigornia	Persons Contacted	Octavio Garcia, Security Manager Bethany Cramer, Senior Management Analyst Nathan Sims, Associate Management Analyst

REFERENCE CRITERIA

1. General Order 164-E
2. System Security Plan (SSP), dated January 2020

ELEMENT/CHARACTERISTICS AND METHOD OF VERIFICATION

ID Concepts for Passenger and Employee Security

Interview the person(s) in charge of ID Concepts for Passenger and Employee Security at VTA. Review and evaluate the various documents as indicated below for the past five years to determine if:

1. VTA has developed internal processes to facilitate security incident trend analysis;
2. The System Safety and Security Team Meeting serves as the agency's main internal security committee;
3. VTA has implemented additional security features and practices for increasing the safety and security of its vehicles; and
4. Protective Services has conducted random, unannounced security drills.

FINDINGS AND RECOMMENDATIONS

Activities:

Staff interviewed VTA personnel in charge of ID Concepts for Passenger and Employee Security and determined the following:

[REDACTED]

[REDACTED]

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2022 CPUC SYSTEM SECURITY REVIEW CHECKLIST FOR SANTA CLARA VALLEY TRANSPORTATION AUTHORITY (VTA)

Checklist No.	4	Element	Process for Internal Security Reviews
Date of Audit	April 21, 2022 08:00-16:30	Department(s)	Protective Services
Auditor/Inspector	Joey Bigornia	Persons Contacted	Octavio Garcia, Security Manager Bethany Cramer, Senior Management Analyst Nathan Sims, Associate Management Analyst

REFERENCE CRITERIA

1. General Order 164-E
2. System Security Plan (SSP), dated January 2020

ELEMENT/CHARACTERISTICS AND METHOD OF VERIFICATION

Process for Internal Security Reviews

Interview the person(s) in charge of Process for Internal Security Reviews at VTA. Review and evaluate the various documents as indicated below for the past five years to determine if:

1. VTA annually performed an internal security audit;
2. VTA addressed all of the required security program elements within a 3-year period and every 3-years thereafter;
3. VTA prepared an internal security audit schedule and submitted it to CPUC Staff at least 30 days before any scheduled audits;
4. VTA's Internal Security Audit (ISA) annual report includes the findings and corrective actions;
5. VTA submits its ISA Annual Report to the General Manager (GM) for approval and certification. A copy of the ISA Annual Report is submitted to CPUC Staff to show compliance with its SSP and to show the status of subsequent Corrective Actions;
6. VTA prepares, implements, and tracks the corrective action plans and schedules to completion.

FINDINGS AND RECOMMENDATIONS

Activities:

Staff interviewed VTA Security and noted the following:

[REDACTED]

[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]



2022 CPUC SYSTEM SECURITY REVIEW CHECKLIST FOR SANTA CLARA VALLEY TRANSPORTATION AUTHORITY (VTA)

Checklist No.	5	Element	Process for Generating its Security Plan
Date of Audit	April 21, 2022 08:00-16:30	Department(s)	Protective Services
Auditor/Inspector	Joey Bigornia	Persons Contacted	Octavio Garcia, Security Manager Bethany Cramer, Senior Management Analyst Nathan Sims, Associate Management Analyst

REFERENCE CRITERIA

1. General Order 164-E
2. System Security Plan (SSP), dated January 2020

ELEMENT/CHARACTERISTICS AND METHOD OF VERIFICATION

Process for Generating its Security Plan

Interview the person(s) in charge of Process for Generating its Security Plan at VTA. Review and evaluate the various documents as indicated below for the past five years to determine if:

1. VTA Chief of System Safety and Security annually reviewed and updated the SSP as needed;
2. VTA General Manager sent a letter to Commission Staff detailing plan modifications, if any;
3. VTA has an existing process for revising the SSP (found in day-to-day operation, internal concerns, external concerns and drill concerns);
4. VTA has an existing process to track all Corrective Action Plan(s) incorporated, or to be incorporated, in the SSP from beginning to end;
5. VTA has an existing process to communicate and disseminate new and revised procedures of the SSP to VTA personnel.

FINDINGS AND RECOMMENDATIONS

Activities:

Staff interviewed VTA Security and noted the following:

[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
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