PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Rail Safety Division **Resolution ST-253**
Rail Transit Safety Branch **October 29, 2026**

R E S O L U T I O N

Resolution ST-253. Granting Approval of the Final Report on the 2022 Triennial Security Review of the Santa Clara Valley Transportation Authority.

PROPOSED OUTCOME:

- Approval of the Final Report of the 2022 Triennial On-site Security Review of Santa Clara Valley Transportation Authority.

SAFETY CONSIDERATIONS:

- This resolution considers the safety and security of the public and employees who might be affected by the Santa Clara Valley Transportation Authority's rail transit passenger service. The resolution approves a report required every three years to comprehensively assess, evaluate, and improve the safety and security of a rail transit system.

ESTIMATED COST:

- There are no costs associated with this resolution.

SUMMARY

This Resolution approves the Rail Safety Division's final report, titled "*2022 Triennial Security Review of Santa Clara Valley Transportation Authority*," dated November 29, 2022. The report compiles the results of the Commission Staff review of the Santa Clara Valley Transportation Authority System Security Program and its compliance with its System Security Plan, the Commission's General Order 164-E and applicable state and federal rules and regulations. The review identified no findings of non-compliance.

BACKGROUND

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 system safety and on-site system security reviews of the transit agencies operating rail fixed guideway systems at least once every three years. These are commonly referred to as triennial safety and triennial security reviews.[1] Staff conduct triennial safety and security reviews to evaluate compliance with an agency's own plans and procedures as well as safety and security laws and regulations applicable to the agency.

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 Santa Clara Valley Transportation Authority (VTA) security program in April 2022. An exit meeting was held with VTA personnel on July 20, 2022, wherein Staff provided a verbal summary of the security audit and noted no findings were identified.

The final report provides a full description of the Commission's VTA security review, including the scope, results, and recommendations, and is identified in this resolution as Attachment A.

Staff found no areas of non-compliance during the review. Activities for each checklist can be found in Section D of the security report.

Staff sent the VTA Security Personnel a copy of the draft security review report for a 30-day comment period on April 9, 2024. VTA responded electronically via letter with no comments on the draft security review report on May 14, 2024.

Scope of Security Review

Commission Staff conducted its security review in accordance both with guidance and training from the Federal Transit Administration (FTA), and with Title 49 Code of Federal Regulations, Part 659. Section 659.23 of Title 49 of the Code of Federal Regulations (renumbered to 49 CFR 674) defined the requirements for a System Security Plan (SSP) for rail transit agencies at the time of the review.

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

According to section 4 of GO 164-E, 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 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 five security checklists that guided Staff's review of the VTA security program. The triennial security review evaluates whether 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.

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

Moreover, all Staff in the RTSB attend the FTA TSSC as part of their overall training. This allows Staff members out in the field to promptly identify security concerns while 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.

DISCUSSION

The final report, "*2022 Triennial Security Review of Santa Clara Valley Transportation Authority*," dated November 29, 2022, included as Attachment A, identifies Staff activities for each of the five checklists covering the six items the Commission's GO 164-E require for inclusion in each Rail Transit Agency's SSP. Staff concluded that VTA demonstrated compliance with both statutory and regulatory obligations and its SSP.

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 are handled by the local jurisdiction's police department.

Rail Safety Division (RSD) Staff recommend that the Commission approve the final security review report titled "*2022 Triennial Security Review of Santa Clara Valley Transportation Authority*" dated November 29, 2022.

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. No comments were received.

FINDINGS AND CONCLUSIONS

1. The RSD RTSB Staff conducted an on-site security review of VTA on April 21, 2022. Staff conducted a post-review exit conference with VTA Management on July 20, 2022.

2. The inquiries and activities conducted for each security area covered during the review are described on the individual review checklists in the final report included as Attachment A to this Resolution.

3. The security report results show no findings of non-compliance were identified during the review. Comment items are described, where applicable, in the Findings/Comments/Recommendations section of each checklist and in the body of the final report.

THEREFORE, IT IS ORDERED THAT:

1. The Rail Safety Division's request for approval of the final security review report titled "*2022 Triennial Security Review of Santa Clara Valley Transportation Authority*" dated November 29, 2022, 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 October 29, 2026; the following Commissioners voting favorably thereon:

/s/Leuwam Tesfai
LEUWAM TESFAI
Executive Director

JOHN REYNOLDS
President
DARCIE L. HOUCK
KAREN DOUGLAS
MATTHEW BAKER
CHRISTINE HARADA
Commissioners

Dated October 29, 2026, at San Francisco, California

ATTACHMENT A

2022 Triennial Security Review Report of Santa Clara Valley Transportation Authority

http://docs.cpuc.ca.gov/SearchRes.aspx?docformat=ALL&DocID=627907847