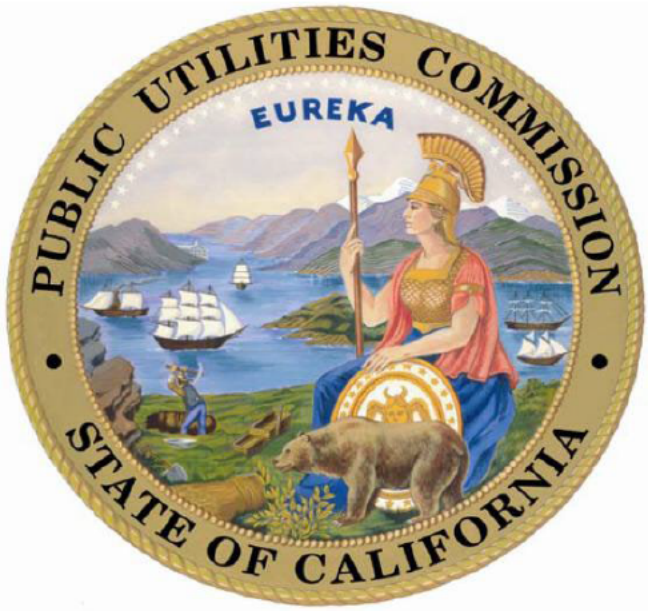
2021

TRIENNIAL SECURITY REVIEW OF SACRAMENTO REGIONAL TRANSIT DISTRICT

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

[CONFIDENTIAL]



Final Report
July 25, 2022

Daren Gilbert, Program Manager
Rail Transit Safety Branch
Rail Safety Division

2021 TRIENNIAL SECURITY REVIEW OF SACRAMENTO REGIONAL TRANSIT DISTRICT

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
Michael Warren – 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 Sacramento Regional Transit District (SRTD) on October 28, 2021. Such reviews are conducted for each California rail transit agency every three years and focus on verifying the effective implementation of the Security and Emergency Preparedness Program Plan version 19-3 (SEPPP), 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, October 18, 2021, SRTD personnel and Staff met for an opening conference, which preceded the on-site review activities. On Thursday, October 28, 2021, Staff conducted the 2021 SRTD triennial on-site security review. A post-review conference meeting occurred on Thursday, January 13, 2022, with Staff providing SRTD personnel with a summary of their review. The results indicate that SRTD has a comprehensive SEPPP, 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) of this report 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 SRTD'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 SRTD. The SRTD 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, "2021 Triennial Safety Review of Sacramento Regional Transit District" is being brought before the Commission concurrently in Resolution ST-246.

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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, *Rail Fixed Guideway Systems: State Safety Oversight*, 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 SRTD SEPPP to assess the level of compliance with GO 164-E and other Commission safety and security requirements.

Staff conducted the previous SRTD on-site security review in October 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 2021. Commission authorization for delaying and rescheduling the triennials was issued under Resolution ST-241.

On September 17, 2021, staff emailed a letter to SRTD's Accountable Executive, advising that the Commission's security review had been scheduled to begin October 18, 2021. The letter included five checklists that served as the basis for verification of the effective implementation of SRTD's SEPPP.

Staff conducted an opening conference on October 18, 2021, with members of SRTD's executive management team, directors, and superintendents. Staff performed the on-site triennial security review at the SRTD executive 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 SRTD's SEPPP. At the conclusion of each review activity, staff provided a verbal summary of the preliminary findings to SRTD personnel and discussed preliminary recommendations for corrective action, if any.

On January 13, 2022, Staff conducted a post-review exit meeting with SRTD'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.

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3. BACKGROUND

The Sacramento Regional Transit District (SRTD) is the regional transit provider in Sacramento, California. An 11-member Board of Directors governs the Sacramento Regional Transit District (SRTD), comprised of members of the Sacramento, Rancho Cordova, Citrus Heights, Elk Grove, and Folsom City Councils, as well as the Sacramento County Board of Supervisors.

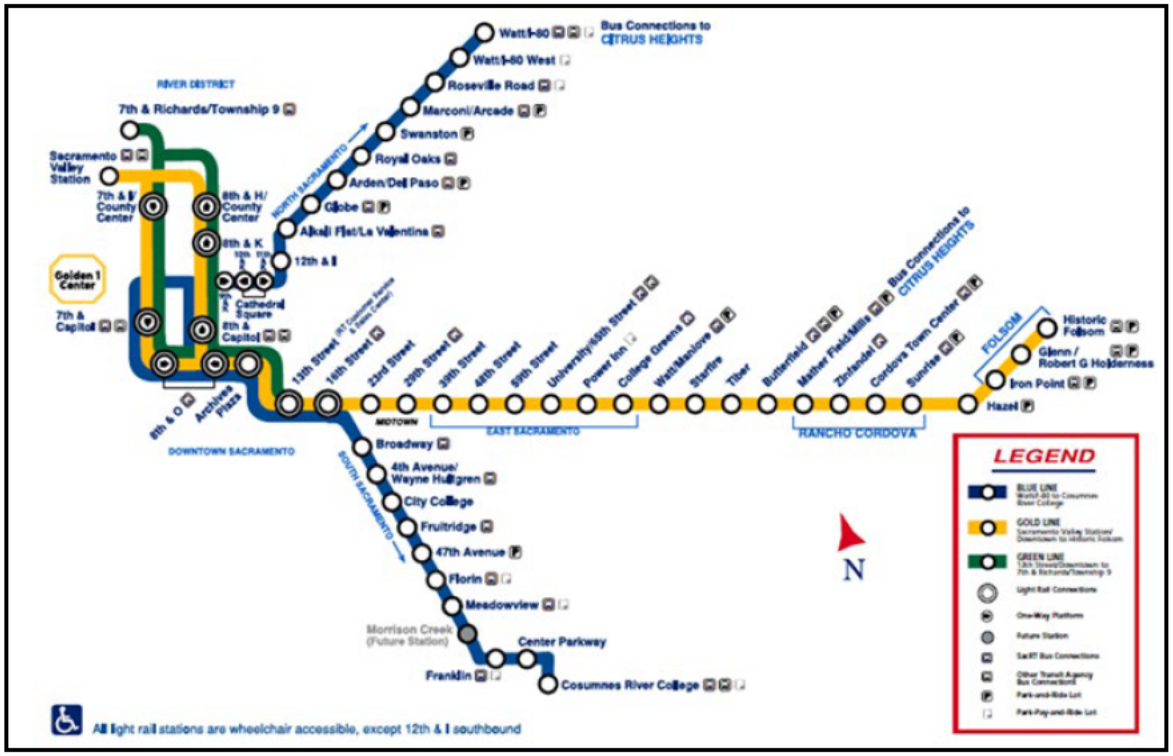
SRTD Rail System

SRTD currently operates approximately 43 miles of track, covering a 422 square-mile service area with 52 stations. Light rail trains currently operate from 3:53 AM to 12:59 AM daily with service every 15 minutes during the day and every 30 minutes in the evening, on weekends and holidays. Weekday ridership averages 44,000 passengers.

SRTD began operations in 1973 with the acquisition of the Sacramento Transit Authority. Over the next decade, SRTD continued to expand its bus service while city, county and state government officials worked together to develop a light rail system. In 1987, the 18.3-mile light rail system opened linking the northeast (Interstate 80) and Folsom (Highway 50) corridors with downtown Sacramento. In 1998, SRTD began expanding the light rail system to meet the transportation needs of the Sacramento area. Since then, SRTD has completed several light rail expansion projects, including:

- 1998 - 2.3-mile Mather Field extension and Brighton Bridge double track project
- 2003 - Bee Bridge double track project
- 2003 - 6.3-mile South Line Phase I extension
- 2004 - 2.8-mile extension from Mather to Sunrise
- 2005 - 2.4-mile extension from Sunrise to Folsom
- 2006 - 0.55-mile extension to Amtrak
- 2009 - Watt Avenue Grade Separation
- 2012 – Green Line Extension from H to T9 Station/Richards Boulevard
- 2015 – 4.3-mile extension of the South Line Project – Phase 2 ending at Consumnes River College

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Sacramento Regional Transit District System Map

In late 2005, SRTD changed its light rail system's names from the North Line, Folsom Line and South Line to the Gold Line and the Blue Line. The Gold Line runs from the Historic Folsom Station in downtown Folsom to the Sacramento Valley Station at the Amtrak Station in downtown Sacramento. The Blue Line runs from the Watt/I-80 Station in the northeast corridor to the Cosumnes River College Station in the south.

In 2012, SRTD completed the Green Line, a one-mile extension from downtown Sacramento to Richards Boulevard. This line includes two stations, running 30-minute service from the Township 9 Station to the existing 13th Street Station. The Green Line to the Airport project is a future extension extending the system from the Richards Boulevard/Township 9 Station to the Sacramento International Airport.

In 2003, SRTD purchased 21 light rail vehicles from the Santa Clara Valley Transportation Authority. SRTD initiated a project to renovate these cars, allowing them to operate on the SRTD light rail system.

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Status of the 2017 SRTD 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-221, adopted April 25, 2019, the Commission granted approval of Staff's final 2017 SRTD Triennial Security Review report.

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4. SECURITY REVIEW PROCEDURE

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 the Code of Federal Regulations defines the requirements for a System Security Plan (SSP) for rail transit agencies.

According to 49 CFR § 659.23[2], 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 SRTD security program. Staff evaluated SRTD's security plans and procedures to determine whether they meet the requirements of section 659.23. The triennial security review evaluated whether SRTD has defined necessary security activities, established responsibilities and accountability, set priorities, provided employee training, developed information distribution and controls, and

[2] **49 CFR Part 659** was effective at the time of the Audit, but officially sunset on **February 7, 2022**, when the Federal Transit Administration (FTA) published its final rescission in the Federal Register. 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]

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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 SRTD adopted are implemented in accordance with statute and the SRTD SEPPP. Staff does not evaluate SRTD's response to specific crimes or events, except during evaluations to assure processes and procedures in place are implemented as intended. Specific crimes and criminal behavior that may occur on trains and stations is considered outside of scope of the review and are 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 2021 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., SRTD's SEPPP, security related SRTD 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 SRTD's operations. A list of the five checklists is provided in Appendix B. The completed checklists are shown in Appendix D.

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

- Discussions and interviews with SRTD 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 SRTD personnel. The post-review summary aims to clarify Staff's findings and provides SRTD an opportunity to promptly address any necessary security improvements.

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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 SRTD regarding its system security program and its implementation. The review results are derived from documents reviewed and issues discussed with SRTD 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
Staff	RSD personnel (CPUC)
SRTD	Sacramento Regional Transit District
TSA	Transit Security Administration
TVA	Threat and Vulnerability Assessment

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APPENDIX B
SRTD 2021 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

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APPENDIX C
SRTD 2021 TRIENNIAL SECURITY REVIEW RECOMMENDATION LIST

No.	Recommendations	Checklist No.
	None.	

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APPENDIX D

SRTD 2021 TRIENNIAL SECURITY REVIEW CHECKLISTS

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2021 CPUC SYSTEM SECURITY REVIEW CHECKLIST FOR SACRAMENTO REGIONAL TRANSIT DISTRICT (SRTD)

Checklist	1	Identify Policies, Goals, and Objectives	
Date of Review	October 28, 2021 9:00-12:00	Department	**SRTD Security & Police Services**
CPUC Reviewer	**Michael Warren** **Rupa Shitole** **Joey Bigornia**	SRTD Persons Contacted	Lisa Hinz, VP of Safety, Security, & Customer Satisfaction Mark Sakauye, Security Administrator Tino Bamberger, Security Program Specialist

REFERENCE CRITERIA

1. Security and Emergency Preparedness Program Plan (SEPPP), dated September 15, 2017
2. SEPPP, Version 19-2, dated March 20, 2019
3. SEPPP, Version 19-3, dated November 6, 2019
4. CPUC General Order 164-D, Section 4.0
5. CPUC General Order 164-E, Section 4.0
6. 49 CFR Part 659, Section 659.23

ELEMENT, CHARACTERISTICS, AND METHOD OF VERIFICATION

Identify Policies, Goals, and Objectives

Interview the SRTD Security Team responsible for policies, goals, and objectives to verify for the past three years:

1. SRTD Management promotes security throughout the organization and enforces related rules, policies, and procedures throughout their areas of control
2. SRTD has ensured compliance with the SEPPP
3. The SRTD SEPPP is signed by the General Manager and VP of Safety, Security, & CS
4. SRTD heightens security awareness among all employees, contractors, and passengers of the District
5. SRTD has developed relations and coordination with local law enforcement and emergency response agencies
6. SRTD prevents security breaches and effectively resolves those that do occur
7. SRTD ensures new processes, modifications and changes in operations do not degrade system security

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8. SRTD encourages employees, contractors, and customers to report suspicious activities and occurrences

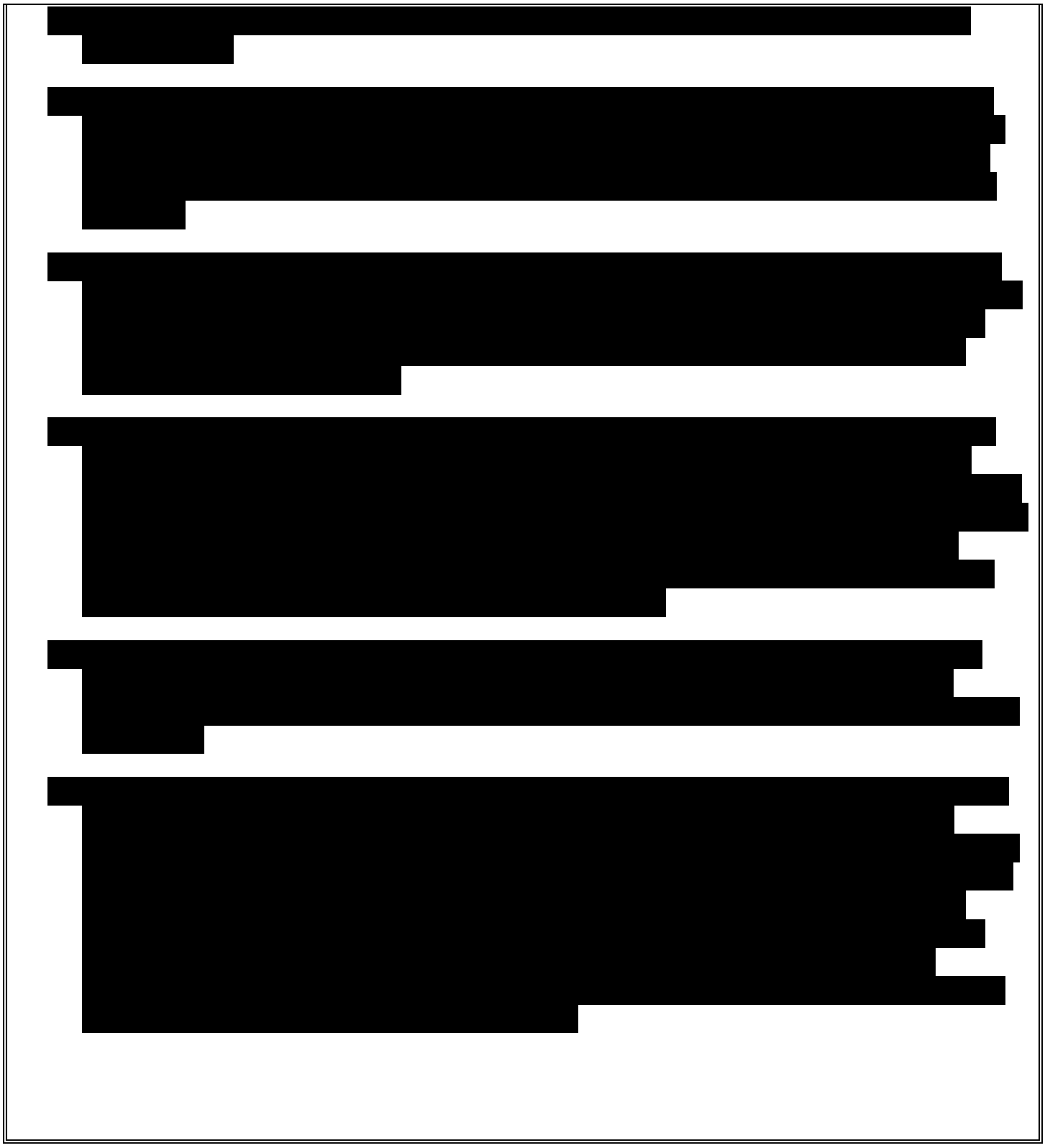
ACTIVITIES, FINDINGS, AND RECOMMENDATIONS

Activities:

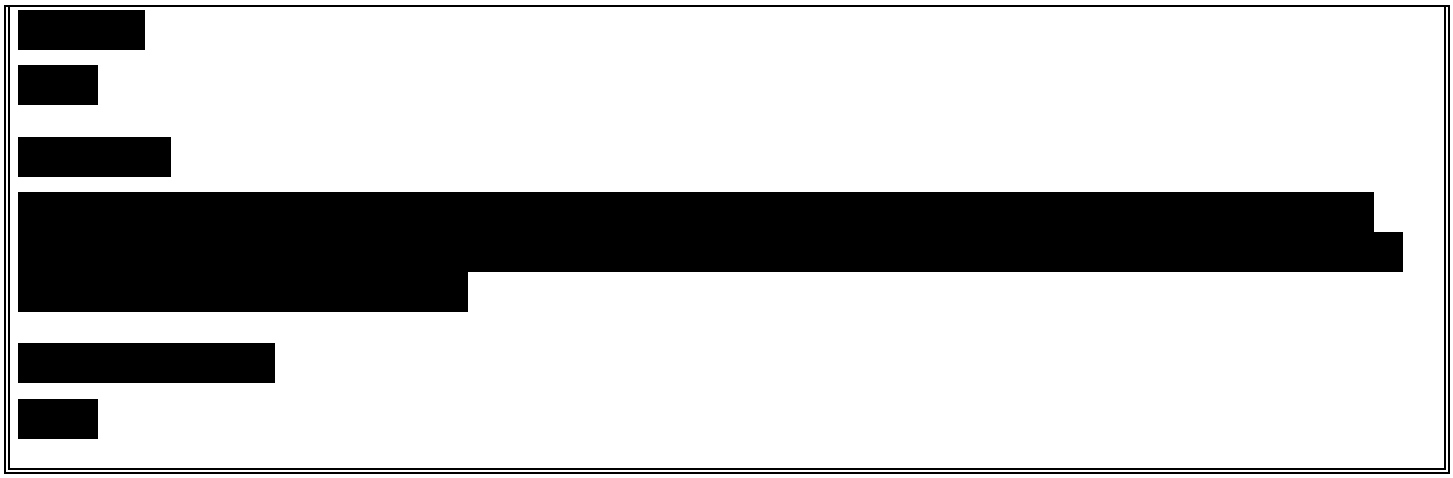
Staff interviewed responsible SRTD personnel and noted the following:

[redacted]

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2021 CPUC SYSTEM SECURITY REVIEW CHECKLIST FOR SACRAMENTO REGIONAL TRANSIT DISTRICT (SRTD)

Checklist	**2**	**Process for Management of Threat and Vulnerability Assessments (TVA)**	
Date of Review	October 28, 2021 9:00-12:00	Department	**SRTD Security & Police Services**
CPUC Reviewer	**Michael Warren** **Rupa Shitole** **Joey Bigornia**	SRTD Persons Contacted	Lisa Hinz, VP of Safety, Security, & Customer Satisfaction Mark Sakauye, Security Administrator Tino Bamberger, Security Program Specialist

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6. 49 CFR Part 659, Section 659.23

ELEMENT, CHARACTERISTICS, AND METHOD OF VERIFICATION

Process for Management of Threat and Vulnerability Assessments (TVA)

Interview SRTD representatives responsible for Security Enforcement and review the SEPPP and TVAs for the past 3 years to determine if:

1. SRTD promotes analysis tools and methodologies to encourage safe system operation through the identification, evaluation and resolution of threats and vulnerabilities, and on-going assessment of district capabilities and readiness;
2. SRTD has a Preparedness Strategy for the prevention, protection against, detection of, response to and recovery from improvised explosive device (IED) and or a weapon(s) of mass destruction (WMD);
3. SRTD develops and implements a vulnerability assessment program, and based on the results of this program, established a course of action for improving physical security measures and emergency response capabilities:
    a. Establish Vulnerability Assessment Team,

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b. Initiate Annual Assessment Program; document and report results recommending action items for implementation,

c. SRTD has a method to track action items to completion;

4. SRTD Security Committee has the authority to propose or recommend additions or changes to policies and procedures, and to recommend courses of action to prevent or minimize further security breaches of a similar nature, are forwarded to the General Manager for review and approval;

5. SRTD implemented all TVA recommendations made in the last three years, and these have been acknowledged by the Security Administrator.

ACTIVITIES, FINDINGS, AND RECOMMENDATIONS

Activities:

Staff interviewed responsible SRTD personnel and noted the following:

[redacted]

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2021 CPUC SYSTEM SECURITY REVIEW CHECKLIST FOR SACRAMENTO REGIONAL TRANSIT DISTRICT (SRTD)

Checklist	3	ID Concepts for Passenger and Employee Security	
Date of Review	October 28, 2021 9:00-12:00	Department	**SRTD Security & Police Services**
CPUC Reviewer	**Michael Warren** **Rupa Shitole** **Joey Bigornia**	SRTD Persons Contacted	Lisa Hinz, VP of Safety, Security, & Customer Satisfaction Mark Sakauye, Security Administrator Tino Bamberger, Security Program Specialist

REFERENCE CRITERIA

1. Security and Emergency Preparedness Program Plan (SEPPP), dated September 15, 2017
2. SEPPP, Version 19-2, dated March 20, 2019
3. SEPPP, Version 19-3, dated November 6, 2019
4. CPUC General Order 164-D, Section 4.0
5. CPUC General Order 164-E, Section 4.0
6. 49 CFR Part 659, Section 659.23

ELEMENT, CHARACTERISTICS, AND METHOD OF VERIFICATION

ID Concepts for Passenger and Employee Security

Interview the SRTD representatives responsible for security & communication with the Department of Homeland Security involvement, and review the security incident reporting program for the past three years to determine if:

1. SRTD's mobile police and private security patrols light rail passenger parking lots per Section 2.9, letter C;
2. SRTD's train operators immediately inform Metro Control of the activation of the passenger emergency button (PEB), and a response by a mobile security guard, police officer or supervisor is initiated per Section 2.9, letter D;
3. SRTD Police Services addresses problematic locations per Section 2.9, letter F;
4. SRTD conducts public awareness campaigns of safety and security per Section 2.9, letter H;
5. SRTD Employees receive system wide training Section 2.9, letter I;
6. SRTD documents, tracks, and resolves all internal and external security issues unto completion.

ACTIVITIES, FINDINGS, AND RECOMMENDATIONS

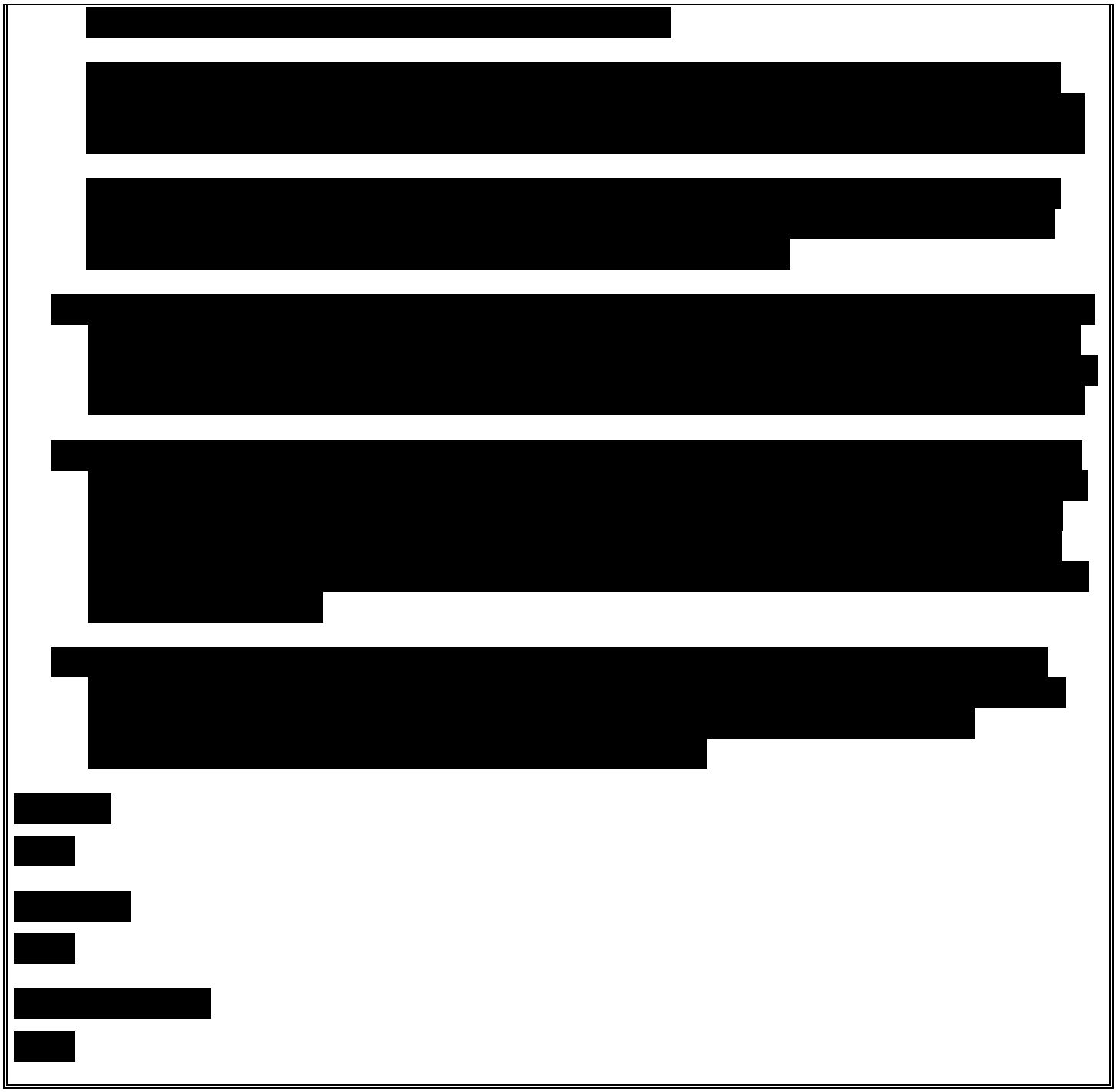
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Activities:

Staff interviewed responsible SRTD personnel and noted the following:

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2021 CPUC SYSTEM SECURITY REVIEW CHECKLIST FOR SACRAMENTO REGIONAL TRANSIT DISTRICT (SRTD)

Checklist	4	Process for Internal Security Audit Reviews	
Date of Review	October 28, 2021 9:00-12:00	Department	**SRTD Security & Police Services**
CPUC Reviewer	**Michael Warren** **Rupa Shitole** **Joey Bigornia**	SRTD Persons Contacted	Lisa Hinz, VP of Safety, Security, & Customer Satisfaction Mark Sakauye, Security Administrator Tino Bamberger, Security Program Specialist

REFERENCE CRITERIA

1. Security and Emergency Preparedness Program Plan (SEPPP), dated September 15, 2017
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5. CPUC General Order 164-E, Section 4.0
6. 49 CFR Part 659, Section 659.23

ELEMENT, CHARACTERISTICS, AND METHOD OF VERIFICATION

Process for Internal Security Audit Reviews

Interview SRTD representatives responsible for the Internal Security Audit Process (ISAP), review the procedure and the audit reports for the past 3 years to determine if:

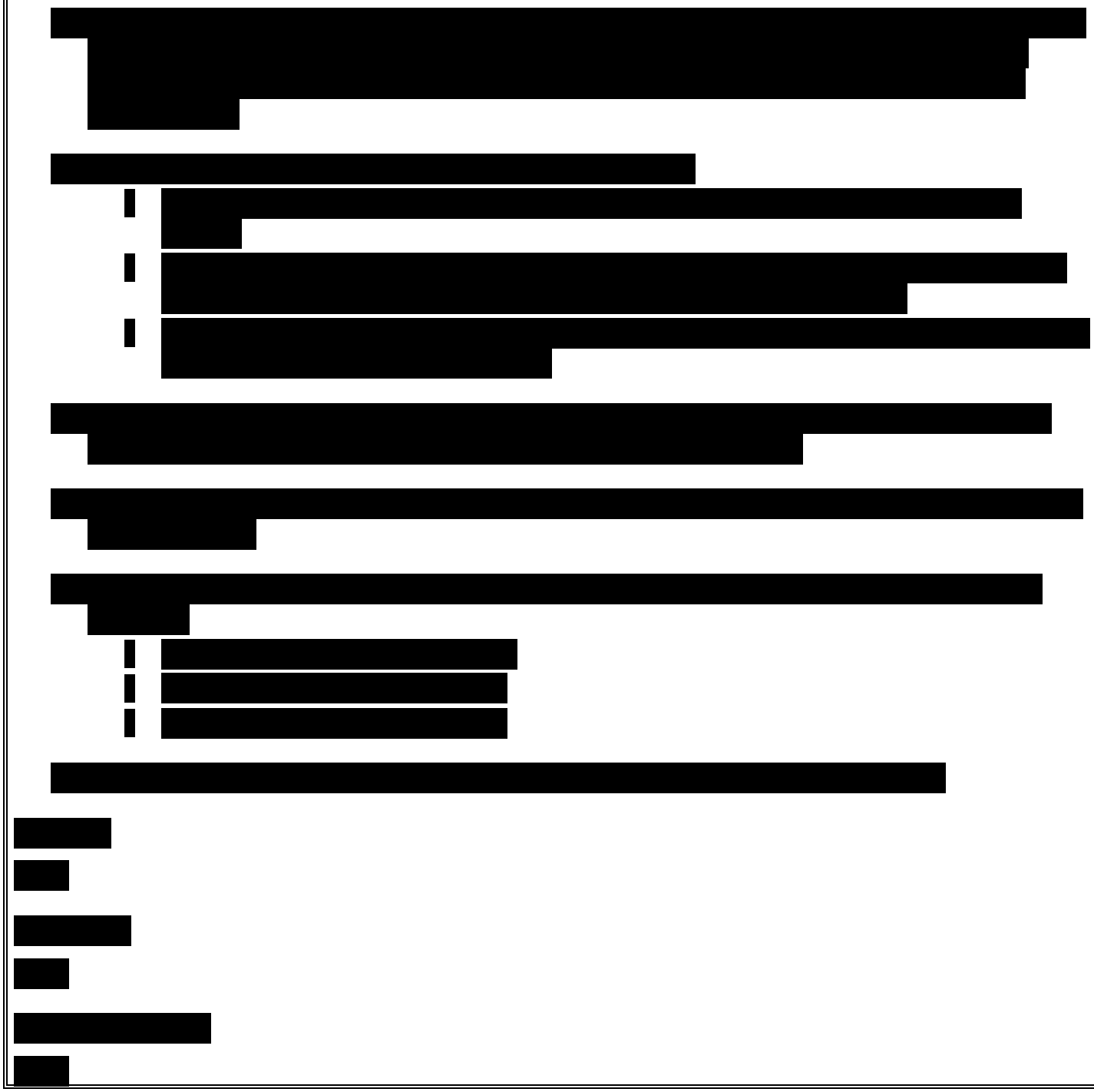
1. SRTD annually performed an internal security audit;
2. SRTD addressed all the required security program elements within the past audit cycle, typically 3 years;
3. SRTD made the internal security audit schedule available to CPUC Staff 30 days before scheduling;
4. SRTD's Internal Security Audit (ISA) annual report includes findings and corrective actions;
5. SRTD submits the ISA annual report to Management for review, approval, and certification. A copy of the ISA report and GM Certification letter demonstrating compliance with the SEPPP is submitted to CPUC Staff for review and approval;
6. SRTD prepares, implements, and tracks corrective action plans to completion.

ACTIVITIES, FINDINGS, AND RECOMMENDATIONS

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Activities:

Staff interviewed responsible SRTD personnel and noted the following:



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2021 CPUC SYSTEM SECURITY REVIEW CHECKLIST FOR SACRAMENTO REGIONAL TRANSIT DISTRICT (SRTD)

Checklist	5	Process for Updating/Generating its Security Plan	
Date of Review	October 28, 2021 9:00-12:00	Department	**SRTD Security & Police Services**
CPUC Reviewer	**Michael Warren** **Rupa Shitole** **Joey Bigornia**	SRTD Persons Contacted	Lisa Hinz, VP of Safety, Security, & Customer Satisfaction Mark Sakauye, Security Administrator Tino Bamberger, Security Program Specialist

REFERENCE CRITERIA

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5. CPUC General Order 164-E, Section 4.0
6. 49 CFR Part 659, Section 659.23

ELEMENT, CHARACTERISTICS, AND METHOD OF VERIFICATION

Process for Updating/Generating its Security Plan

Interview SRTD representatives responsible for SEPPP administration and review the implementation and update process for the past 3 years to determine if:

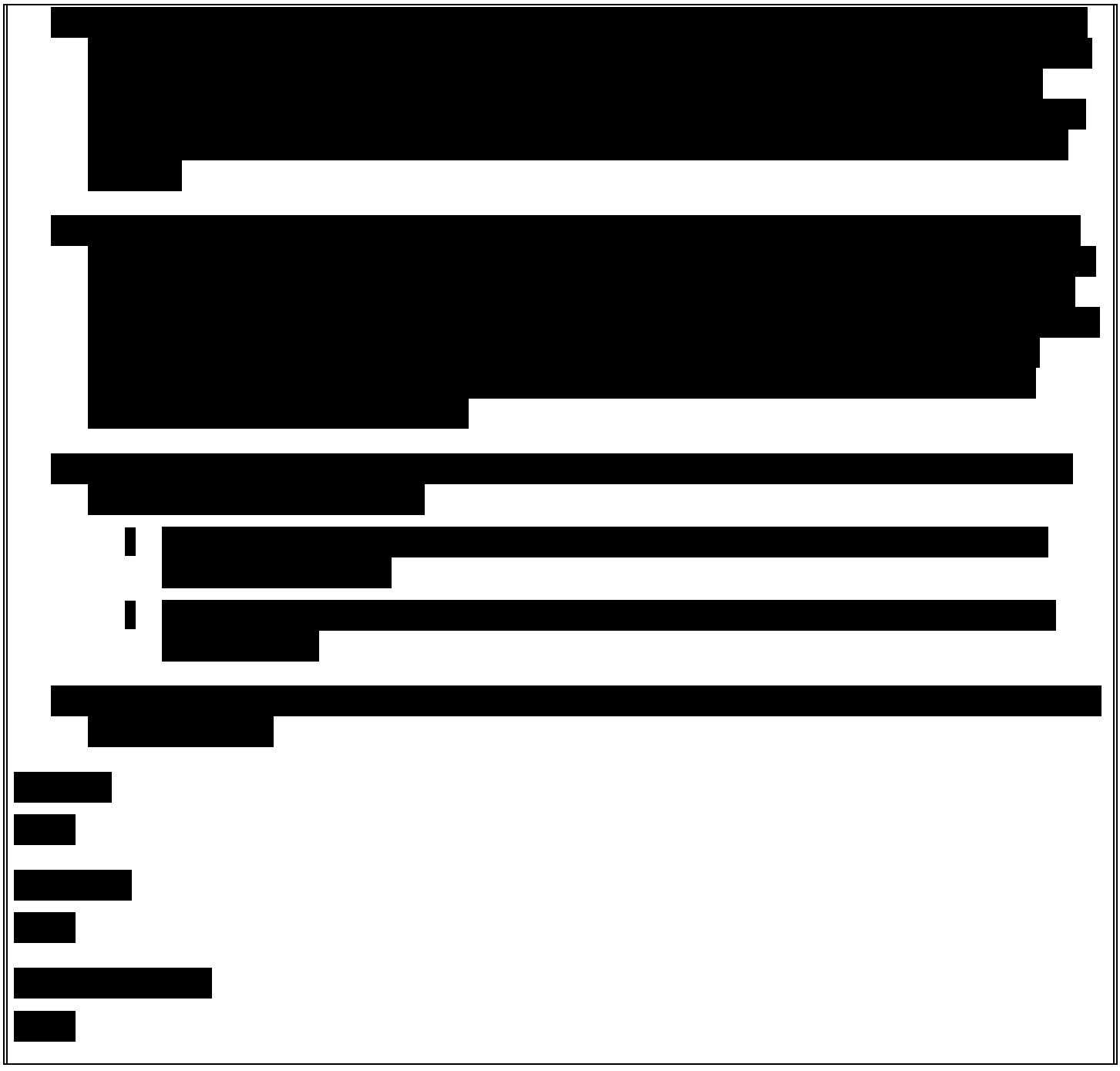
1. SRTD's VP of Safety, Security, & CS performs the functions specified in Section 3.2 of the SEPPP;
2. SRTD reviews the SEPPP as specified per Section 7.2;
3. SRTD sent a letter to CPUC Staff detailing proposed changes of a substantive nature for review and approval prior to implementation if any;
4. SRTD implements modifications as specified per Section 7.3.

ACTIVITIES, FINDINGS, AND RECOMMENDATIONS

Activities:

Staff interviewed responsible SRTD personnel and noted the following:

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