2021
TRIENNIAL
SECURITY REVIEW OF
SAN FRANCISCO BAY AREA
RAPID TRANSIT DISTRICT

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

[CONFIDENTIAL]

January 10, 2024
Final Report

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Rail Transit Safety Branch
Rail Safety Division

2021 TRIENNIAL SECURITY REVIEW OF SAN FRANCISCO BAY AREA RAPID TRANSIT DISTRICT

ACKNOWLEDGEMENT

The California Public Utilities Commission's Rail Transit Safety Branch conducted this System Security Program Review. Staff members directly responsible for conducting the review and inspection activities are:

Joey Bigornia – 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 San Francisco Bay Area Rapid Transit District (BART) in December of 2021. 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.

An opening conference meeting between BART personnel and Staff immediately preceded the initial on-site review activities on Monday, November 29, 2021. The review took place from December 2, 2021, through December 3, 2021, and focused on verifying the effective implementation of BART's SSP. A post-review conference meeting took place following the review on June 3, 2022, during which Staff provided BART personnel with a synopsis of the review comments, findings, and recommendations. The review results indicate that BART maintains a comprehensive system security program and has been implementing its SSP. However, Staff made note of several findings of non-compliance and propose recommendations for Corrective Action Plans (CAP) in response as part of this report.

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

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This report reflects Staff's triennial security review of BART. The BART 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 San Francisco Bay Area Rapid Transit District*" is being brought before the Commission concurrently in Resolution ST-248.

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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*, and the Federal Transit Administration's (FTA's) 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 reviews of each rail transit agencies system safety program at minimum once every three years. The purpose of the Triennial Review is to verify compliance and evaluate the effectiveness of each rail transit agency's SSP, and to assess the level of compliance with GO 164-E as well as other Commission safety requirements.

Staff conducted the previous On-Site System Security Review of BART in September 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.

Staff notified BART's General Manager (GM) by letter, dated October 29, 2021, regarding scheduling of the Commission's Safety and Security Review to begin on November 29, 2021. The notifications included preliminary versions of the review checklists for BART to review and provide comments.

The Review began with an opening conference meeting on November 29, 2021, attended by CPUC Staff and BART's GM, and Assistant GM of Operations, BART Chief of Police, Director of Security Programs, Chief Safety Officer (CSO), Manager of Operations Safety, Safety Management Systems Manager, and additional personnel.

Staff conducted the on-site system security interviews on December 2, 2021 through December 3, 2021. Staff provided BART personnel with a verbal summary of any preliminary findings and discussed potential recommendations for corrective actions at the conclusion of each review activity.

On June 4, 2022, Staff conducted a post-review exit meeting with BART management to verbally convey all the findings from the Review.

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3. BACKGROUND

SAN FRANCISCO BAY AREA RAPID TRANSIT DISTRICT
SYSTEM DESCRIPTION

The Original System

BART began revenue operations on September 11, 1972, along 28 miles of track in Alameda County, servicing Oakland to Fremont. The second segment opened on January 29, 1973, with 12 miles of track extending to Richmond. A 17-mile segment, opening May 21, 1973, offered service from Oakland to Concord. On November 5, 1973, a new, temporarily disconnected 7.5-mile segment opened between Montgomery Street in Downtown San Francisco and Daly City. The Transbay Tube (TBT) opened on September 16, 1974, fully connecting the 71.5 miles of track of the original BART system. Embarcadero Station opened on May 27, 1976, bringing the total station count to 34 without any additional track.

Completed Extensions

An extension to the Concord line, continuing to the North Concord/Martinez Station, opened on December 16, 1995, adding 2.25 miles of track to the BART system. The Coloma Station opened for revenue service on February 24, 1996, adding 1.6 miles of track south of the Daly City Yard. The Pittsburg/Bay Point Station opened on December 7, 1996, completing the 7.8-mile extension from Concord station that included the North Concord/Martinez Station. The Dublin/Pleasanton extension opened on May 10, 1997, adding 14 miles of track and two stations to the system. The San Francisco Airport extension opened on June 22, 2003, adding four stations and 8.7 miles of track. The Warm Springs Extension Project added 5.4 miles of track, extending from the Fremont Station to the Warm Springs Station in South Fremont and opened for revenue service on March 25, 2017. The Berryessa Extension Project expanded the system 10 miles further south from Warm Springs to Berryessa Station in San Jose and was opened for revenue service on June 13, 2020.

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The **Oakland Airport Connector (OAC),** a 3.2-mile automated people mover system, connects the main BART system from BART Coliseum Station to the Oakland Airport, and was approved for revenue service on November 24, 2014.

The **East Contra Costa BART Extension (eBART, currently the E-Line**), which operates Diesel Multiple Unit vehicles, provides passenger service along 10.1 miles of the California State Route 4 corridor connecting Pittsburg/Bay Point Station to Antioch Station. The segment was opened for revenue service on May 26, 2018.

The current BART system operates on 131 miles of track with 50 stations on the following six operating lines:

- Richmond—Millbrae Line
- Richmond—Berryessa/North San Jose Line
- Antioch—SFO Airport Line
- Daly City—Berryessa/North San Jose Line
- Daly City—Dublin/Pleasanton Line
- Coliseum Station—Oakland Airport Line

Capital Projects

CPUC monitors all system modifications the System Safety or Engineering Departments decide will require a formal system analysis, in accordance with General Order 164-E, Section 11, and the PTASP, Section 7.6.3. BART has several major system extensions and modifications currently in progress.

The **Santa Clara Valley Transportation Authority/Silicon Valley Rapid Transit Project** 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, 4 stations and a Newhall Yard Maintenance Facility in the City of Santa Clara. Construction of the second phase is expected to begin in 2023 with passenger service targeted for 2036. The Safety and Security Certification Plan (SSCP) for this project was submitted by BART and

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was approved by the CPUC in Resolution ST-83 (2/15/2007). On June 16, 2021, Staff received the project SSCP for phase II, and CPUC approval was sent on August 17, 2021.

The **Irvington Station Project** will include constructing a new station with twin at-grade side platforms and an overhead concourse, which will be the third station within the City of Fremont, halfway between the existing Fremont and Warm Springs / South Fremont stations. Originally adopted by the BART Board of Directors in 1992 as a two-station extension (Warm Springs and Irvington), the Warm Springs Extension Project was re-scoped, and Irvington Station was made an "optional" station with funding to be identified separately by the City of Fremont. The project was re-scoped and re-adopted throughout the years, with the most recent in 2019 to better comport with current circumstances including updated BART policies and City of Fremont development guidelines. The estimated completion date for construction is 2029, depending upon funding, the availability and extent of construction windows as supported by BART single-tracking operations. The SSCP for this project was submitted by BART and was approved by the CPUC in Resolution ST-240 (11/5/2020). The Project has completed 90% final design.

The **Hayward Maintenance Complex Project Phase I** added and replaced four components to the existing Haward Yard facilities: modified the Hayward Main Shop, replaced the Component Repair Shop, added the Central Warehouse, and added 7,200 ft. of new trackwork. BART submitted the SSCP and was approved by the Commission on 12/17/2015 under Resolution ST-181. BART opened portions of the project under interim approvals as components were completed. The full Safety Certification Verification Report (SCVR) was submitted by BART on 7/8/2022 and approved by Commission Staff on 10/6/2022.

The Transbay Corridor Core Capacity Program (TCCCP) is a package of strategic investments that will allow BART to operate up to 30 ten-car trains per hour (300 cars) in each direction through the existing tube, maximizing throughput in the most heavily used part of its system. The program includes four elements: additional railcars to provide the additional trains needed, a new communications-based train control system that will allow closer headways, a new railcar storage yard at the HMC, and additional traction power substations (TPSS) to provide the additional power needed for the more frequent service. The program entered FTA's Core Capacity Project Development in

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August 2015, and Engineering in June 2019.

- The **Traction Power System Improvements Project** (TPSIP) will add new TPSS in five areas throughout the BART system to meet electrical power requirements to meet the TCCCP. The five sites have been divided into two projects with each project served by a separate General Engineering Consultant (GEC) Preliminary Engineering Team. One project includes the West Bay sites (M-Line Civic Center Station TPSS and M-Line Montgomery Street Station TPSS), and one project includes the East Bay sites (K-Line Thirty Fourth Street TPSS, C-Line David Avenue and Minert Road TPSS, and R-Line Richmond Yard East TPSS). Both projects are monitored by a single BART Project Manager and a GEC Design Oversight Team. The SSCP for this project was submitted by BART and was approved by the CPUC in Resolution ST-239 (10/26/2017). West Bay sites are under construction; East Bay sites are ready for construction bids.

- The **Hayward Maintenance Complex Project Phase II** will add additional storage tracks (East storage yard), Industrial Parkway Overcrossing Structure, Golf Cart/personnel overcrossing structure, and additional facilities. The SSCP for this project was submitted by BART and was approved by the CPUC in Resolution ST-218 (3/28/2019).

- The **Communications-Based Train Control Project** (CBTC) will replace BART's existing signaling system with CBTC. CBTC technology utilizes two-way digital Radio Frequency communications between intelligent trains and a network of distributed zone controllers. The primary characteristics of a CBTC System include high-resolution train location determination, by carborne equipment, independent of track circuits; communication between the carborne equipment and wayside CBTC equipment over a radio frequency train-to-wayside data communications link; determination of movement authority limit information for each CBTC-equipped train by the wayside zone controllers, based on derived train location information and inputs from wayside interlockings; and determination and enforcement of the safe speed/distance profile by the carborne CBTC equipment. The project is a design-build project and will be conducted in phases. BART will start CBTC with vehicle specific design and testing. Subsequently, BART will install CBTC wayside equipment on a test track and

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perform testing with certified vehicles. Lastly, BART will install CBTC on mainline track, and test CBTC with certified vehicles. The mainline testing process will be repeated for all segments. The SSCP for this project was submitted by BART and was approved by the CPUC in Resolution ST-206 (7/16/2020).

- The **New Vehicle Procurement Project** (NVP) will add up to 1000 new rail cars to BART's existing fleet. Alstom (originally Bombardier) is manufacturing a complete replacement of the Legacy fleet. BART is continuing to make progress on the project, and to date 656 cars have been added to the fleet. The entire legacy fleet has been retired as of September 11, 2023. The SSCP for this project was submitted by BART and was approved by the CPUC in Resolution ST-150 (3/22/2013).

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FOLLOW-UP STATUS OF THE 2017 BART TRIENNIAL SECURITY REVIEW

The BART 2017 Triennial On-Site Security Review demonstrated that BART was in compliance with its SSP. Staff found no findings of non-compliance and issued no recommendations for corrective actions to BART.

CPUC Commission Resolution ST-216, adopted on October 11, 2018, granted approval of the Staff's final report of the BART 2017 Triennial On-Site Security Review report.

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4. SECURITY REVIEW PROCEDURE

Scope of Security Review

Commission Staff conducted its security review in accordance with the guidance and training from the FTA and with Title 49 CFR § 659.[2] Section 659.23 of the CFR defines the requirements for a SSP for rail transit agencies.

According to 49 CFR § 659.23, 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 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 SSP.

(e) Document the rail transit agency's process for making its SSP 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 BART security program. Staff evaluated BART's security plans and procedures to determine whether they meet the requirements of section

[2] **49 CFR Part 659** was still in place at the time of the Audit, but officially sunset on **February 7, 2022**, when the 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]

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659.23. The triennial security review evaluated whether BART 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 BART adopted are implemented in accordance with statute and the BART SSP. Staff does not evaluate BART'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 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 RTSB 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 System Security Review of BART in accordance with Rail Transit Safety Branch Procedure RTSB-4, *Procedure for Performing Triennial Safety Audits of Rail Transit Systems,* and G.O. 164-E, Section 4, *Requirements for System Security Plans*.

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Staff developed 5 checklists to cover various aspects of system security responsibilities, based on Commission and FTA requirements, BART's SSP and other security-related documents, Department of Homeland Security (DHS), the Transportation Security Administration's (TSA) baseline review list, TSA "sensitive security information (49 C.F.R. § 1520 et seq.), and Staff's knowledge of BART security operations. The checklists are included as Appendix C of this report.

Each checklist identified security-related elements and characteristics that Staff either inspected directly or by reviewing reports and records. The completed checklists include two findings of non-compliance, and one recommendation pertaining to BART's SSP and its procedures, and/or Commission regulations. The methods used to perform the review included:

- Discussions and interviews with BART management
- Review of rules, procedures, policies, and records
- Interviews with involved employees.

Immediately following the security review, Staff summarized their findings and preliminary recommendations with involved BART personnel. The post-review summary is intended to clarify Staff's findings and provides BART an opportunity to promptly address any necessary security improvements.

The review checklists concentrated on requirements that affect the security of transit operations and are known or believed to be important in reducing security threats, encouraging best practices, and provided BART an opportunity to promptly address any necessary security improvements.

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FINDINGS AND RECOMMENDATIONS

The reviewers and inspectors who participated in the On-Site System Security Review concluded that BART has a comprehensive SSP and is implementing it. However, Staff observed two findings of non-compliance and provided one recommendation to improve the system security program. These findings and recommendations are listed below and grouped by checklist number.

1. System Security Plan: Identify Policies, Goals, and Objectives

[redacted]

2. Process for Management of Threats and Vulnerabilities

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 Reviews

[redacted]

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[redacted]

5. Process for Generating its Security Plan Implementation, Activities, and Responsibilities

No findings of non-compliance; no recommendations.

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APPENDICES

Abbreviation and Acronym List ..... Appendix A.

Checklist Index ..... Appendix B.

Checklists ..... Appendix C.

APPENDIX A. ABBREVIATION AND ACRONYM LIST

Abbreviation or Acronym:	Definition:
AAR	After-Action Report
BART	San Francisco Bay Area Rapid Transit District
BECO	BART Engineering Change Order
BEST	BART Employees Station Team
CAP	Corrective Action Plan
CBTC	Communications-Based Train Control
CCTV	Closed Circuit Television
CFR	Code of Federal Regulations
Commission	California Public Utilities Commission
CPTED	Crime Prevention Through Environmental Design
CPUC	California Public Utilities Commission
CSO	BART Chief Safety Officer
DHS	Department of Homeland Security
eBART	East Contra Costa BART Extension
EOD	Explosive Ordinance Device
FTA	Federal Transit Administration
GEC	General Engineering Consultant
GM	BART General Manager
GO	CPUC General Order
HMC	Hayward Maintenance Complex Project
ISA	Internal Security Audit
ISSA	Internal Safety and Security Audit
LESEP	Law Enforcement Security Enhancement Program

Abbreviation or Acronym:	Definition:
M&E	Maintenance and Engineering Department
NVP	New Vehicle Procurement Project
NYE	New Year's Eve
OCC	Operations Control Center
PRD	Personal Radiation Device
PTASP	Public Transportation Agency Safety Plan
RSD	Rail Safety Division
RTSB	Rail Transit Safety Branch
RTSS	Rail Transit Safety Section
SCVR	Safety Certification Verification Report
SSCP	Safety and Security Certification Plan
SSI	Security Sensitive Information
SSIH	Sensitive Security Information Handler
SSP	System Security Plan
Staff	CPUC Personnel
TBT	Transbay Tube
TCCCP	Transbay Corridor Core Capacity Program
TPSIP	Traction Power System Improvements Project
TPSS	Traction Power Substations
TSA	Transportation Security Administration
TVA	Threat and Vulnerability Assessment
UOR	Unusual Occurrence Report

APPENDIX B. CHECKLIST INDEX

Checklist No.:	Element/Characteristic:
1	System Security Plan: Identify Policies, Goals, and Objectives
2	Process for Management of Threats and Vulnerabilities
3	ID Concepts for Passenger and Employee Security
4	Process for Internal Security Reviews
5	Process for Generating its Security Plan

APPENDIX C. CHECKLISTS

CPUC develops a series of checklists prior to each triennial security review of California Rail Transit Agencies. These checklists are based on the 5 elements which are required to appear in each agency's SSP and are customized according to the SSP and the unique features of the agency under review.

BART received a draft version of these checklists showing only the Reference Criteria and Element/Characteristics and Method of Verification fields on October 29, 2021, and CPUC coordinated with BART to modify the checklists to better reflect the nature of the BART system and the intent of CPUC's review. BART provided facilities in appropriate locations throughout the system, and representatives from either agency were carefully selected to attend each checklist activity to maximize the effectiveness of the review. Although each checklist provides guidance for the activities, CPUC reviewers are authorized to inquire about and inspect any aspect of the BART system they determine to be relevant to system security and the section of the SSP in question.

CPUC reviewers provided immediate feedback to BART representatives regarding any initial findings following a checklist's activities. The reviewers then revise the checklist document to include a summary of their review, findings of non-compliance, recommendations for corrective action, and any additional comments. The completed checklists are provided below.

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2021 CPUC SYSTEM SECURITY REVIEW CHECKLIST FOR SAN FRANCISCO BAY AREA RAPID TRANSIT DISTRICT (BART)

Checklist No.	**1**	**Element**	System Security Plan: Identify Policies, Goals, and Objectives
Date of Audit	12/2/2021	**Department(s)**	BART Police Department
Auditor/Inspector	Michael Warren Joey Bigornia Rupa Shitole	**Persons Contacted**	Mimi Bolaffi, Director of Security Programs Mike Brill, Manager of Emergency Preparedness

REFERENCE CRITERIA

1. CPUC General Order 164-D/E
2. BART System Security Plan dated July 2021

ELEMENT/CHARACTERISTICS AND METHOD OF VERIFICATION

System Security Plan: Identify Policies, Goals, and Objectives

Interview the person(s) in charge of Security at BART to review and evaluate various documents as indicated below for the past three years to determine if:

1. The BART SSP is certified by BART General Manager, and BART Chief of Police.
2. BART's security program provides heighten security awareness among all employees, contractors, and passengers.
3. Security personnel and personnel from operations and construction meet on a needed basis to implement and coordinate the transit security effort.
4. BART provides ongoing security training for operators and other transit personnel to enhance their ability to maintain a secure transit system.
5. BART's management teams participate in the Executive Security Committee meetings and establishes policy for all BART's transit security programs.

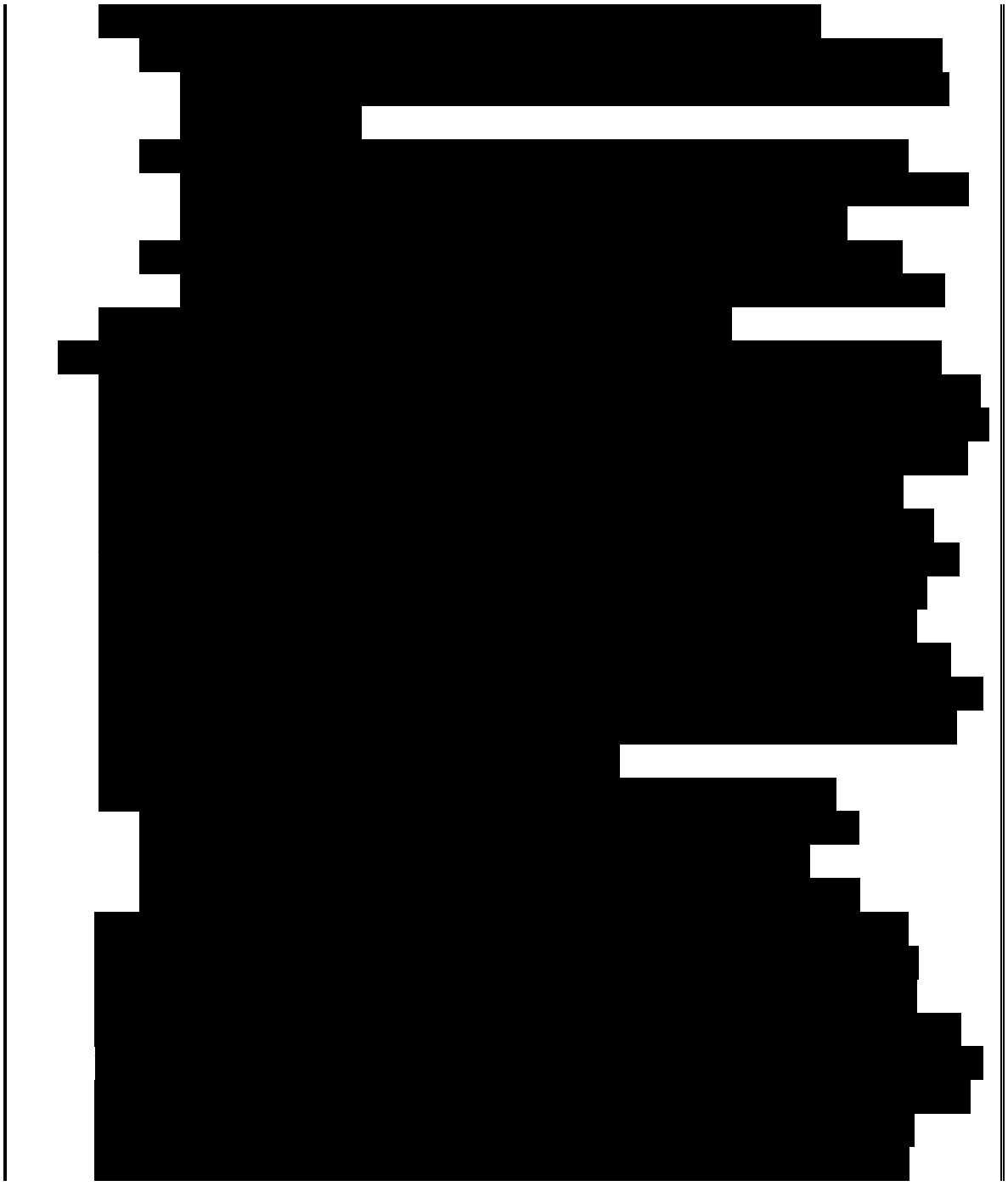
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FINDINGS AND RECOMMENDATIONS

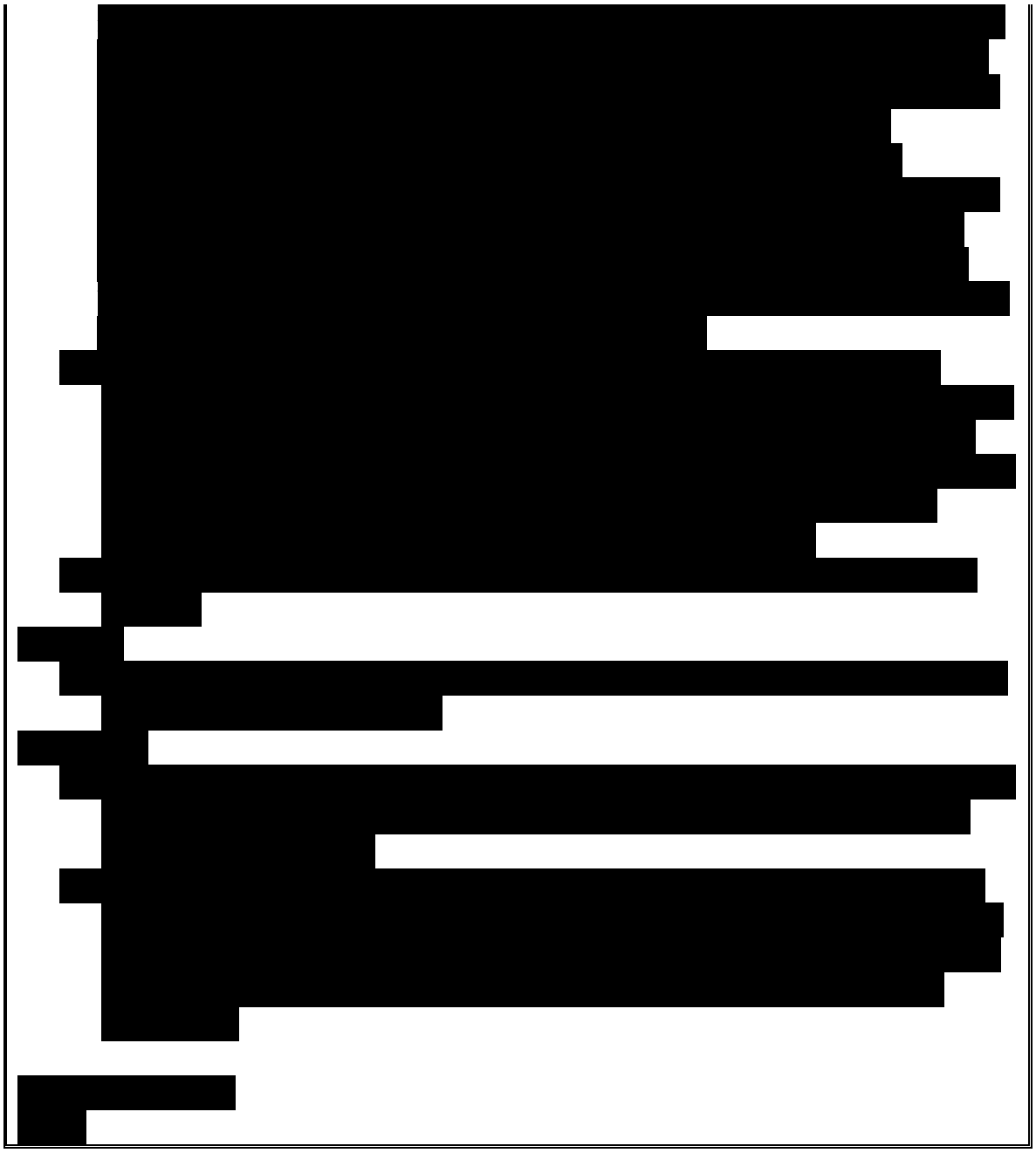
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[3] On April 22, 2017, a group of 40 to 60 individuals boarded a BART train without paying fare and committed several robberies, injuring multiple other passengers.

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2021 CPUC SYSTEM SECURITY REVIEW CHECKLIST FOR SAN FRANCISCO BAY AREA RAPID TRANSIT DISTRICT (BART)

Checklist No.	**2**	**Element**	Process for Management of Threats and Vulnerabilities
Date of Audit	12/3/2021	**Department(s)**	Security
Auditor/Inspector	Rupa Shitole Joey Bigornia Michael Warren	**Persons Contacted**	Mimi Bolaffi, Director of Security Programs Mike Brill, Manager of Emergency Preparedness

REFERENCE CRITERIA

1. CPUC General Order 164-D/E
2. BART System Security Plan dated July 2021

ELEMENT/CHARACTERISTICS AND METHOD OF VERIFICATION

Process for Management of Threats and Vulnerabilities

Interview BART representatives responsible for the Security Enforcement and review the SSP and TVAs for the past three years to determine if:

1. BART performed Threat and Vulnerability Assessments (TVA) that identified facilities and systems containing critical assets based on external and internal sources.
2. BART deploys security staff based upon:
   a. Terrorism and/or Criminal Activity
   b. Intelligence Information
   c. Emergency Response Capabilities
   d. System Vulnerabilities
3. BART has implemented or is considering implementation TVA recommendations from the past year.
4. BART TVA (e.g. Crime Prevention Through Environmental Design (CPTED)) Process was used for the HMC Project Phase II, Train Control Modernization

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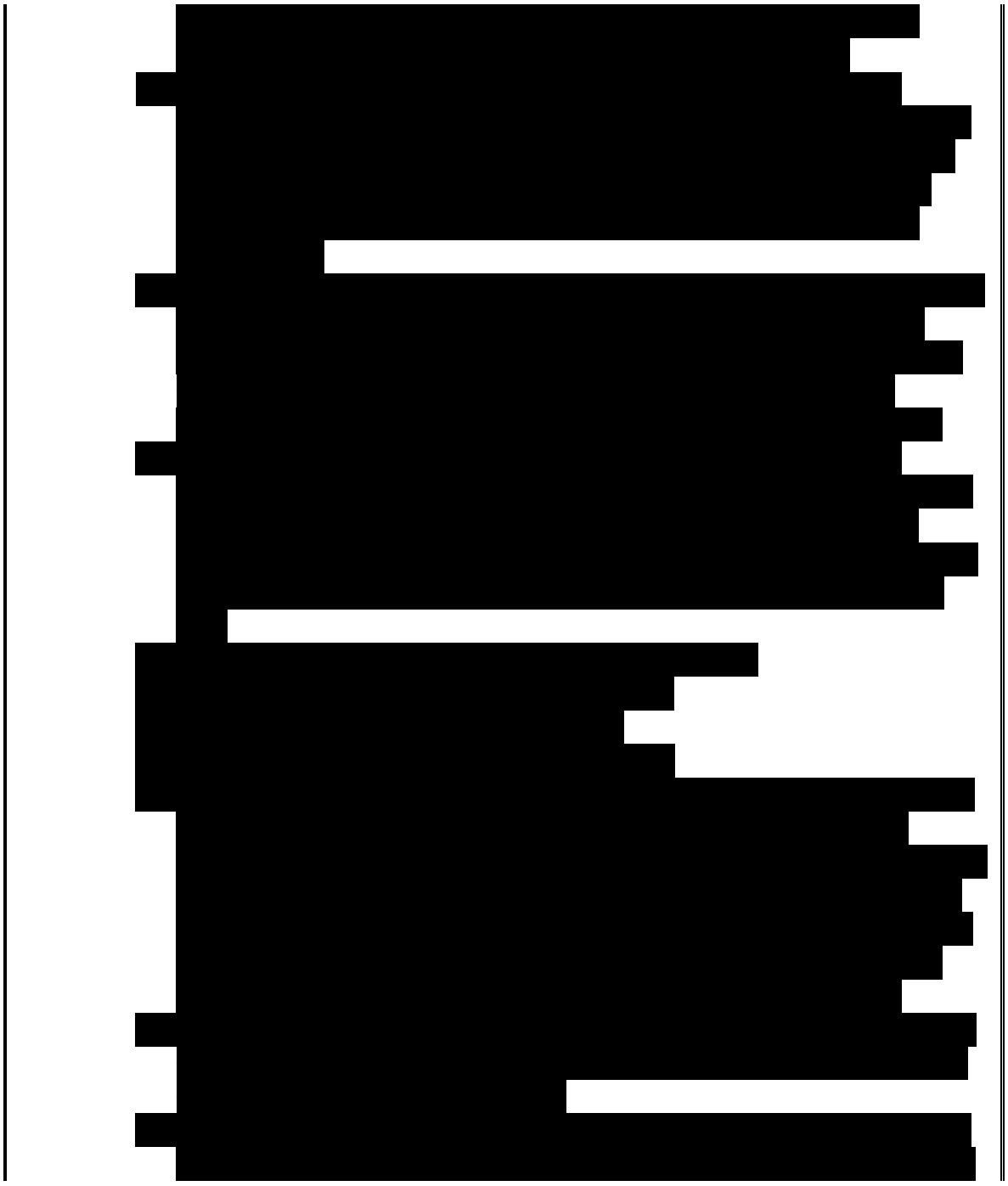
Project, Silicon Valley Phase II Extension Project, TPSS Project, and Irvington Station Project.

5. BART's Construction TVAs are approved by the appropriate BART Staff responsible for reviewing the findings and recommendations.
6. BART's annual Risk Assessment and Vulnerability Scores and the TSA three-year required TVAs are reviewed by the appropriate BART Staff responsible for implementing recommendations if necessary.

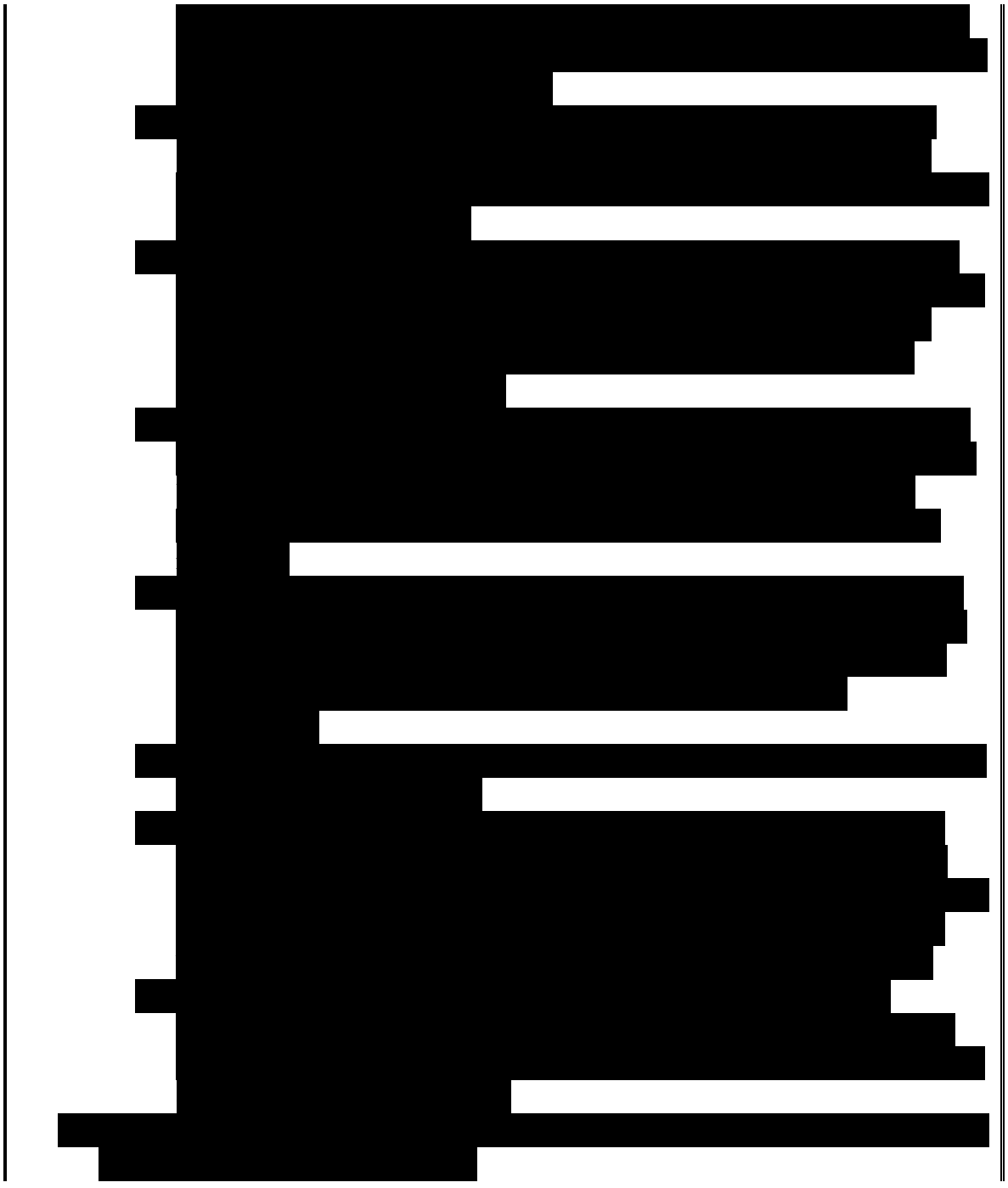
FINDINGS AND RECOMMENDATIONS

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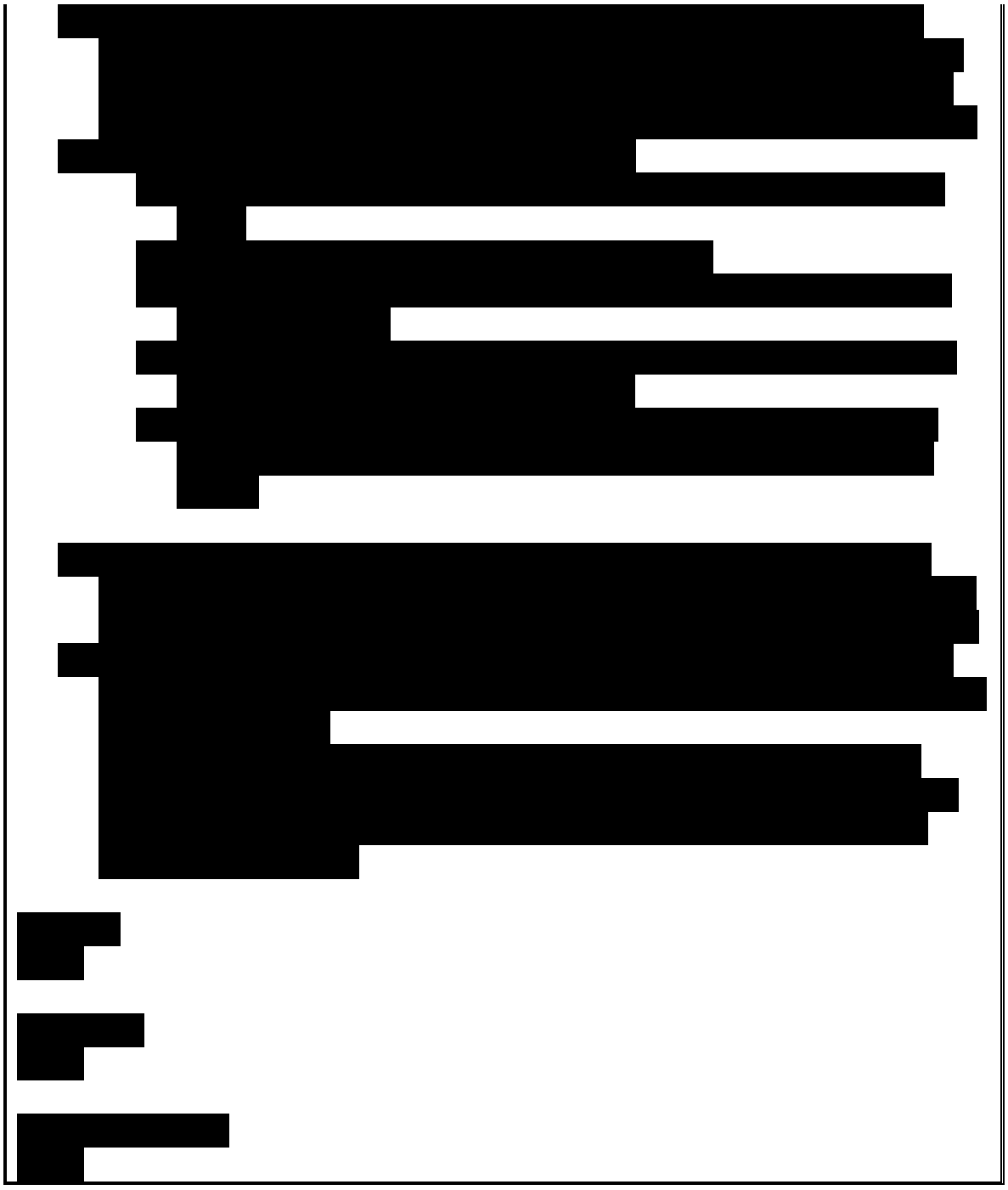
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2021 CPUC SYSTEM SECURITY REVIEW CHECKLIST FOR SAN FRANCISCO BAY AREA RAPID TRANSIT DISTRICT (BART)

Checklist No.	**3**	**Element**	ID Concepts for Passenger and Employee Security
Date of Audit	12/3/2021	**Department(s)**	Security
Auditor/Inspector	Rupa Shitole Joey Bigornia Michael Warren	**Persons Contacted**	Mimi Bolaffi, Director of Security Programs Mike Brill, Manager of Emergency Preparedness

REFERENCE CRITERIA

1. CPUC General Order 164-D/E
2. BART System Security Plan dated July 2021

ELEMENT/CHARACTERISTICS AND METHOD OF VERIFICATION

ID Concepts for Passenger and Employee Security

Interview the BART representatives responsible for the Security & Communication and review the security incident reporting program for the past three years to determine if:

1. BART performs Facility Security and Access Controls (Section 4.13).
2. BART performed security drills with outside agencies as required on their rail transit system.
3. BART is trending crime patterns to deploy its security resources in high crime areas. Randomly select a crime analysis report area from each line for the past three years and compare the crime rate for the following three years to show crime rates were reduced.
4. BART distributed security awareness information (brochures, message boards, PAs, etc. such as Transit Watch) throughout the system.
5. BART has a security incident reporting program and courtesy phones for passengers.

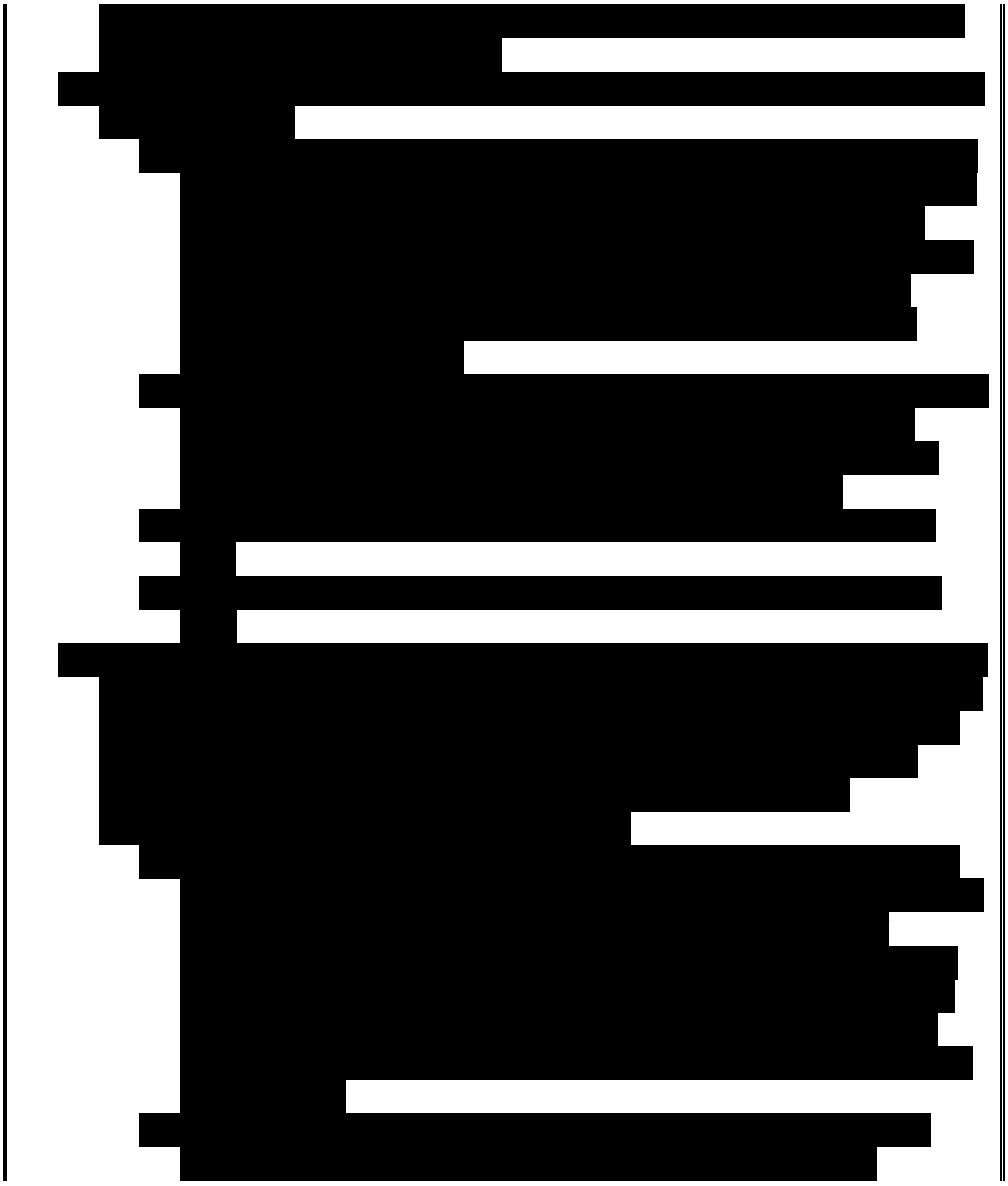
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6. BART documents, tracks, and resolves all internal and external security issues to completion.
7. BART's Law Enforcement Security Enhancement Program (LESEP). Please explain how this program has been working for BART's passenger and employee's security. (Section 4.9.1.)

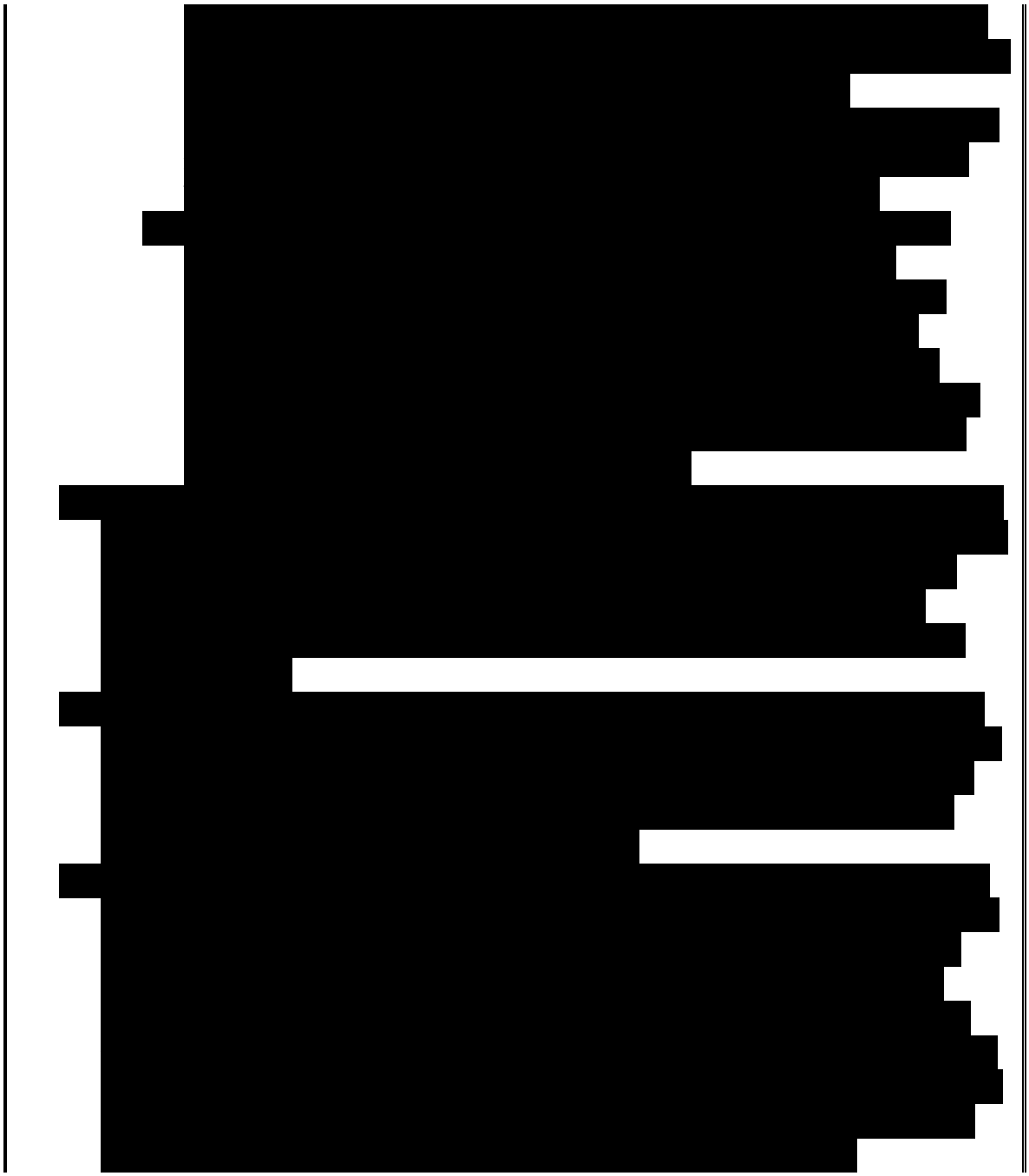
FINDINGS AND RECOMMENDATIONS



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2021 CPUC SYSTEM SECURITY REVIEW CHECKLIST FOR SAN FRANCISCO BAY AREA RAPID TRANSIT DISTRICT (BART)

Checklist No.	**4**	**Element**	Process for Internal Security Reviews
Date of Audit	12/3/2021	**Department(s)**	Executive Management
Auditor/Inspector	Michael Warren Joey Bigornia Rupa Shitole	**Persons Contacted**	Mimi Bolaffi, Director of Security Programs Mike Brill, Manager of Emergency Preparedness

REFERENCE CRITERIA

1. CPUC General Order 164-D/E
2. BART System Security Plan dated July 2021

ELEMENT/CHARACTERISTICS AND METHOD OF VERIFICATION

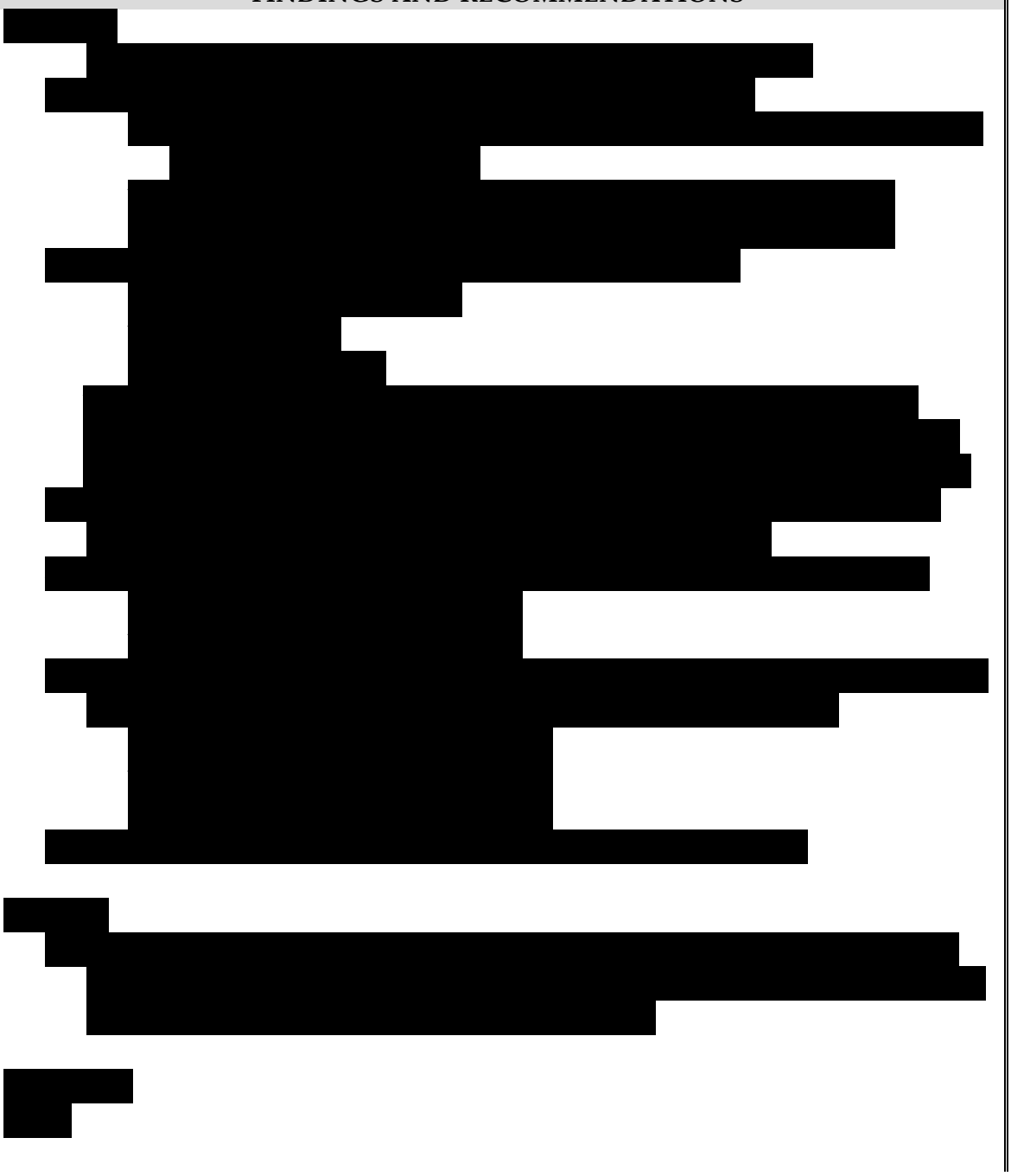
Process for Internal Security Reviews

Interview the BART representatives responsible for the ISA Process and review the audit reports for the past three years to determine if:

1. BART annually performs an ISA.
2. BART addressed all the required security program elements within a 3-year period and every 3-years thereafter.
3. BART prepared an ISA schedule and submitted it to CPUC Staff at least 30 days before any scheduled audits.
4. BART's ISA annual report includes the findings and corrective actions.
5. BART submits its ISA Annual Report to the 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. BART prepares, implements, and tracks the CAPs and schedules to completion.

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2021 CPUC SYSTEM SECURITY REVIEW CHECKLIST FOR SAN FRANCISCO BAY AREA RAPID TRANSIT DISTRICT (BART)

Checklist No.	**5**	**Element**	Process for Generating its Security Plan
Date of Audit	12/3/2021	**Department(s)**	Security
Auditor/Inspector	Joey Bigornia Rupa Shitole Michael Warren	**Persons Contacted**	Mimi Bolaffi, Director of Security Programs Mike Brill, Manager of Emergency Preparedness

REFERENCE CRITERIA

1. CPUC General Order 164-D/E
2. BART System Security Plan dated July 2021

ELEMENT/CHARACTERISTICS AND METHOD OF VERIFICATION

Process for Generating its Security Plan

Interview the BART representatives responsible for the SSP Administration, review the SSP implementation, and update processes of the SSP for the past three years to determine if:

1. BART Director of Security Programs annually reviewed and updated the SSP as needed.
2. BART GM sent a letter to Commission Staff detailing plan modifications, if any.
3. BART has an existing process for revising the SSP (found in day-to-day operation, internal concerns, external concerns, and drill concerns).
4. BART has an existing process to track all CAPs incorporated, or to be incorporated, in the SSP from beginning to end.
5. BART has an existing process to communicate and disseminate new and revised procedures of the SSP to BART personnel.

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FINDINGS AND RECOMMENDATIONS

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