

2009
TRIENNIAL SECURITY REVIEW OF
SAN DIEGO TROLLEY, INC.
(SDTI)

RAIL TRANSIT SAFETY SECTION
RAIL TRANSIT AND CROSSING BRANCH
CONSUMER PROTECTION AND SAFETY DIVISION
CALIFORNIA PUBLIC UTILITIES COMMISSION
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**2009 SECURITY REVIEW OF
SAN DIEGO TROLLEY, INC.
(SDTI)**

ACKNOWLEDGEMENT

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

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*** These sections are included in attachment B and contains Sensitive Security Information (SSI) that is controlled under 49 CFR parts 15 and 1520. No part of this record may be disclosed to persons without a "need to know" as defined in 49 CFR parts 15 and 1520, except with the written permission of the Administrator of the transportation security Administration or the secretary of Transportation. Unauthorized release may result in civil penalty or other action. For U.S. government agencies, public disclosure is governed by 5 U.S.C. 552 and 49 CFR parts 15 and 1520.**

1. EXECUTIVE SUMMARY

The California Public Utilities Commission's (Commission) Consumer Protection and Safety Division (CPSD), Rail Transit Safety Section staff (staff) conducted an on-site security review of San Diego Trolley, Inc. (SDTI) in June 2009. The review focused on verifying the effective implementation of the Security Emergency Preparedness Plan, addressing Threat & Vulnerability Assessment (TVA) and emergency response.

Following the on-site security review, staff held a post-review conference with SDTI personnel on July 17, 2009. Staff provided the SDTI Chief Executive Officer and Chief of Transit Security a preliminary summary report detailing the on-site review recommendations for corrective actions.

The security review results indicate that SDTI has a comprehensive Security and Emergency Preparedness Plan (SEPP) and has effectively carried out that plan. Staff found SDTI's progressive and effective security program very concise and efficient. Staff exceptions found during the review are described in the Findings and Recommendations section of each checklist. Of the 9 checklists, staff made 7 recommendations for corrective action.

The Introduction for this report is presented in Section 2. The Background, in Section 3, contains a description of the SDTI rail system and the Review Procedure is in Section 4. Section 5 contains the Findings and Recommendations.

The Acronyms listing is in Appendix A and the SDTI 2009 Triennial Security Review Checklist Index and Recommendations List are included in Appendices B and C respectively. The Security Review Checklists are presented in Appendix D.

2. INTRODUCTION

The Commission's General Order (GO) 164-D, *Rules and Regulations Governing State Safety Oversight of Rail Fixed Guideway Systems*, 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 safety and security program(s) at a minimum of once every three years. The purpose of the review is to evaluate the effectiveness of each rail transit agency's SEPP and to assess the level of compliance with GO 164-D as well as other Commission safety and security requirements.

On May 22, 2009, staff sent a letter, along with thirty two safety (32) and nine (9) security checklists, to the SDTI Chief Executive Officer, advising SDTI that the safety and security annual review would be scheduled June 22 to 26, 2009. Staff subsequently confirmed specific dates and times with the SDTI Office of Health and Safety.

An entrance meeting held on June 22, 2009, including executive level management and representatives from CPUC, SDTI, MTS, and San Diego Association of Governments (SANDAG) preceded the records reviews. Staff provided preliminary review findings and recommendations to SDTI and SANDAG management and representatives at the exit meeting on July 17, 2009.

Staff performed the on-site security review at SDTI's 1255 Imperial Ave office on June 29, 2009. Staff utilized nine (9) checklists for the inspection of the Security and Emergency Preparedness Plan. Staff derived the checklist review questions from CPUC's GO 164-D, FTA's 49 CFR 659, Transportation Security Administration's (TSA) Baseline Security Review, SDTI's SSPP and SEPP, Federal Transit Administration (FTA) FTA-TRI-MA-7085-05 and FTA Transit Agency Security and Emergency Management Protective Measures dated Nov. 2006.

3. SDTI BACKGROUND

The Metropolitan Transit Development Board (MTDB) was created in 1975 by passage of California Senate Bill 101 and was empowered to design, engineer, and build fixed guideway facilities within San Diego County, California. San Diego Trolley, Inc. (SDTI) was created by the MTDB in August 1980 as a wholly owned subsidiary responsible for operation and maintenance of the Light Rail Transit (LRT) system. The San Diego Regional Transportation Consolidation Act (Senate Bill 1703 effective January 1, 2003) directed consolidation of the San Diego Association of Governments (SANDAG) with the capital projects functions of the transit boards MTDB and North San Diego County Transit Development Board (NCTD). The planning, programming, project development, and construction functions of MTDB and NCTD were shifted to SANDAG to create a consolidated regional transportation planning and development agency. In 2005, MTDB changed its name to the Metropolitan Transit System (MTS) to reflect the new relationship with SANDAG.

SDTI Rail System Description

The SDTI LRT system operates over 53.5 miles on three routes, mostly double-tracked, with 53 stations. Weekday ridership averaged 82,589 in 2009 (Fiscal year), with a total of 36.9 million riders carried in 2009 (Fiscal year). SDTI's rail lines are classified as "light rail" on semi-exclusive right-of-way. There is a shared corridor with BNSF, Amtrak, and Coaster trains beginning at Park Blvd/Harbor Drive on the Bayside Corridor going through the Old Town Corridor parallel to Pacific Highway and ending approximately a quarter mile north of the Taylor Street grade crossing. In addition to the shared corridor, portions of SDTI track on the Blue and Orange Lines are jointly used by light rail transit and freight operations under scripted temporal separation with limited night-time joint operations. The San Diego and Imperial Valley Railroad (SDIV), a subsidiary short line railroad owned by Rail America Corporation, shares track with SDTI on the Blue line from the Imperial Transfer Station to the International Border. SDTI and SDIV share track on the Orange Line from Commercial Street at the Imperial Junction to Bradley Avenue in El Cajon, California. Freight operations by SDIV operate during the early morning hours with a fringe period of overlap with SDTI light rail transit operations under a Federal Railroad Administration (FRA) waiver. FRA approved SDTI standard operating

procedures ensure during this mode of operation of overlap that the light and conventional rail vehicles remain spatially and temporally¹ separated.

SDTI Lines

SDTI operates three lines described as:

- Blue Line - Revenue service began on July 26, 1981. The Blue Line currently extends 19.1 miles from the Old Town Transit Center to the San Ysidro Station at the U.S-Mexico international border. Trains operate on city streets for 1.4 miles (India and C Streets to 13th and Commercial Streets) of the total 19.1 miles with the remaining 14.1 miles from 13th and Commercial Streets to San Ysidro International Border operating in semi-exclusive right of way². The Blue Line operates through four jurisdictions: the cities of San Diego, National City, Chula Vista, and an unincorporated area of San Diego County.
- Green Line - Revenue service began on July 10, 2005. The Green Line begins at the Old Town Transit Center Station and extends 19.3 miles through Mission Valley, under San Diego State University (SDSU) via a subway and continues east on semi-exclusive right-of-way to Cuyamaca Street in Santee. The last 0.6 miles of the line are operated on city streets before terminating at the Santee Town Center Station.
- Orange Line – Revenue service on the first phase, from Imperial Transfer to the Euclid Station, began on March 23, 1986. The line was extended in 1989 to El Cajon, and to Santee in 1995. The Orange Line is 20.6 miles from the Imperial Terminal Station, via the Bayside Corridor and Downtown San Diego to the Gillespie Field Station in El Cajon. The Orange Line route serves the Bayside Corridor with the Gaslamp Quarter, Convention Center, and Seaport Village Stations adjacent to Harbor Drive. The line continues 1.4 miles on the city streets shared with the Blue Line (India and C Streets to Park Blvd. and Commercial Streets), then continues independently east for two additional miles on Commercial Street to 32nd Street. After 32nd Street Station, the line

¹ Temporal separation exists when no simultaneous operation of rail transit and freight trains on the same tracks occurs

² CPUC General Order 143-B, §9.04 Alignment Classification: Semi-exclusive is 1) fully exclusive right-of-way with at-grade crossings, protected between crossings by a fence or substantial barrier, if appropriate to the location. 2) Within street right-of-way, but protected by six-inch high curbs and safety fences between crossings. The safety fences should be located outside the tracks. 3) Within street right-of-way, but protect by six-inch high curbs between crossings. A safety fence may be located between tracks. 4) Within street right-of-way, but protected by mountable curbs, stripping, or lane designation.

continues east for an additional 15.6 miles on semi-exclusive right-of-way to the Gillespie Field Station in El Cajon. The Orange Line operates through four jurisdictions including the City of San Diego, Lemon Grove, La Mesa and El Cajon.

4. REVIEW PROCEDURE

Staff conducted the 2009 security review in accordance with Rail Transit Safety Section Procedure No. 4, *Procedure for Performing Triennial Safety & Security Reviews of Rail Transit Systems*. Staff developed nine (9) checklists to evaluate the adequacy of SDTI's Security and Emergency Preparedness Plan and the efficacy of its implementation.

The security evaluation includes the SDTI's security department, programs and processes which have system security functions and responsibilities. The security review is based on Commission and FTA requirements, SDTI's SEPP & SSPP, American Public Transportation Association (APTA) system safety program guidelines, TSA baseline review list, TSA security related documents, Federal Transit Administration (FTA) FTA-TRI-MA-7085-05, FTA Transit Agency Security and Emergency Management Protective Measures Nov. 2006, and the staff's knowledge of the transit system. The nine (9) checklists are listed in Appendix B.

Each checklist identifies the core security-related elements and characteristics that staff reviewed. Each of the checklists also references Commission, SDTI, and other documents that establish the security program requirements. The methods used to perform the review include:

- Discussions and interviews with SDTI's management
- Reviews of rules, procedures, policies, and records

Immediately following the security review, staff summarized the findings and the preliminary recommendations with SDTI's Chief of Security. The post-review summary is beneficial for clarifying findings or best-practices and provided SDTI an opportunity to promptly address any necessary security improvements.

5. FINDINGS AND RECOMMENDATIONS (CONFIDENTIAL)

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APPENDIX A

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ACRONYMS LIST

Abbreviation or Acronym	Definition
CAP	Corrective Action Plan
CEO	Chief Executive Officer
CFR	Code of Federal Regulations
Commission	California Public Utilities Commission
CPSD	Consumer Protection and Safety Division
CPUC	California Public Utilities Commission
CTC	Centralized Traffic Control
DHS	Department of Homeland Security
ERP	Emergency Response Plan
FTA	Federal Transit Administration
GO	General Order
ICS	Incident Command System
ISA	Internal Safety & Security Audit
MOU	Memorandum Of Understanding
MTDB	Metropolitan Transit Development Board
NIMS	National Incident Management System
PC	Penal Code
POST	Peace Officer Standards and Training
RCS	San Diego Regional Communications System
RTCB	Rail Transit and Crossing Branch
RTSS	Rail Transit Safety Section

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SANDAG	San Diego Association of Governments
SCADA	Supervisory Control And Data Acquisition
SCIC	Security and Critical Incident Committee
SDCSD	San Diego County Sheriff's Department
SDTI	San Diego Trolley, Inc.
SSI	Sensitive Security Information
SEPP	Security and Emergency Preparedness Plan
SSPP	System Safety Program Plan
Staff	California Public Utilities Commission Staff
TSA	Transportation Security Administration
TVA	Threat & Vulnerability Assessment
UDC	Unified Disaster Council

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APPENDIX B
SDTI 2009 ANNUAL SECURITY REVIEW CHECKLISTS INDEX
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APPENDIX C
SDTI 2009 TRIENNIAL SECURITY REVIEW RECOMMENDATION LIST
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APPENDIX D
SDTI 2009 TRIENNIAL SECURITY REVIEW CHECKLISTS

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