SR 25-246
Att.1.

Public Transportation Agency Safety Plan

Adopted In compliance with 49 CFR Part 673 and 49 USC § 5329(d)

Version 4.0

2024

Safety Management System Policy Statement

AC Transit is committed to the highest practical level of safety and security standards and practices in the public transit industry and this Public Transportation Agency Safety Plan. This commitment aligns with AC Transit's Strategic Plan and is consistent with the Safety Management Systems four functional components:

Safety Policy
System Risk Management
Safety Assurance
Safety Promotion

Certification of Compliance - 673.13(a)(b)

AC Transit is committed to planning and delivering bus service in ways that promote the health and safety of our customers, employees, contractors, and the public. This policy outlines the district's safety commitment, consistent with current federal regulations (49 CFR Part 673 and 49 U.S.C. § 5329(d)), and develops a Public Transportation Agency Safety Plan (PTASP) based on the Safety Management Systems approach.

AC Transit management is responsible for maintaining a coordinated safety system to identify and prevent unsafe acts and conditions that present a potential danger or threat to public safety. Executive and management staff are responsible for maintaining and implementing the PTASP and complying with this document's policies, procedures, and standards. All departments, personnel, and contract service operators are responsible for implementing and adhering to this plan. Any violation of safety and security practices is subject to appropriate administrative action. Management is ultimately responsible for the oversight, evaluation, implementation, and compliance with the plan while maintaining a safe and secure system.

Each employee shall be responsible for safely performing his or her duties following the procedures as outlined in the Public Transit Agency Safety Plan. It shall be the duty of each AC Transit employee to cooperate fully and provide any information that is requested during any investigation or review that may be undertaken by the district, right-of-way agencies, the Federal Transit Administration, or any other public that may have concern regarding the safety of operations within the AC Transit.

Kathleen Kelly

Interim General Manager

Accountable Executive

Latrina Meredith

LaTrina Meredith

ATU Local 192 President/Labor Representative

VERSION CONTROL/REVISION HISTORY

Version Number and Updates *Record the complete history of successive versions of this plan.*			
Version Number	Status Change	Reason for Change	Date Issued
.5	Document Development	N/A	12/5/2018
1.0	Approved Final	Safety Management System Compliance	5/13/2020
2.0	Revision	Bipartisan Infrastructure	12/30/2022
3.0	Revision	Annual review of the PTASP	12/29/2023
4.0	Revision	Annual review and updates related to 2024 FTA guidance	12/28/2024

TABLE of CONTENTS

TRANSIT AGENCY INFORMATION - 673.23(d)

Background

Moving Ahead for Progress in the 21st Century (MAP-21) granted the Federal Transit Administration (FTA) the authority to establish and enforce a comprehensive framework to oversee public transportation safety throughout the United States. MAP-21 expanded the FTA's regulatory authority to oversee safety, providing an opportunity to assist transit agencies in moving towards a more holistic, performance-based approach to Safety Management Systems (SMS). This authority was continued through the Fixing America's Surface Transportation Act (FAST Act).

In compliance with MAP-21 and the FAST Act, FTA promulgated a Public Transportation Safety Program on August 11, 2016, that adopted SMS as the foundation for developing and implementing a Safety Program. FTA is committed to developing, implementing, and consistently improving strategies and processes to ensure that transit achieves the highest practicable level of safety. SMS helps organizations improve their safety performance by supporting the institutionalization of beliefs, practices, and procedures for identifying, mitigating, and monitoring safety risks.

This document is based on the Public Transportation Agency Safety Plan (PTASP) rule, 49 CFR Part 673, and guidance provided by the FTA.

In November 2021, the Bipartisan Infrastructure Law (BIL) was signed into law and amended FTA's safety program at 49 United States Code (USC) Section 5329(d) by adding to the PTASP requirements. Changes include strategies to minimize exposure to infectious diseases, strategies to reduce assaults on transit workers, expansion of training, and the formation of a Safety Committee. As of the publication of this revision of the Safety Plan, the FTA released a Notice of Proposed Rulemaking (NPRM) regarding changes based on the BIL. These changes will not substantially change this Safety Plan as they will codify what was included in 49 U.S.C. 5329(d), which was previously addressed.

FTA also recently released proposed revisions to the National Public Transportation Safety Plan (NPTSP) to address the new requirements in the BIL, enacted as the Infrastructure Investment and Jobs Act (IIJA) to advance transit safety further. The revision supersedes the one that the FTA published in January 2017. It lays out a performance-based approach to reduce injuries and fatalities on transit systems under FTA's safety jurisdiction. If these changes are ratified, this plan will be updated to include safety training for maintenance staff and de-escalation training for all safety-sensitive personnel. Three new Safety Performance Measures will be added for tracking, including "Transit Worker Fatality Rate" Assaults on Transit Workers," and Rate of Assaults on Transit Workers." This plan will then be updated to include two new Safety Risk Reduction Program Measures, which are "Assaults on Transit Workers" and "Rate of Assaults on Transit Workers, both of which are already reported to the FTA through the National Transit Database (NTD).

Furthermore, In April 2024, the Federal Transit Administration (FTA) made essential updates to the Public Transportation Agency Safety Plan (PTASP) regulations to improve transit agencies' safety management and performance monitoring. These updates stress the need for data-based decisions and proactive risk management. Key changes include using advanced safety performance metrics to provide a more complete view of safety by recording a wider range of incidents and near-misses. This helps agencies spot potential hazards earlier and take action to prevent them. Additionally, the FTA now requires more thorough training programs for transit staff, focusing on modern safety management systems (SMS) practices and emergency preparedness to create a knowledgeable workforce focused on the culture of safety.

The updated PTASP regulation adds stronger oversight and accountability measures for 5307 agencies. These agencies must now conduct regular safety audits and submit detailed reports on their safety performance and compliance with SMS as detailed in their PTASP plans. These reports should include specific plans for addressing any safety issues identified and providing a commitment to continuous improvement. The regulation also highlights the importance of management in promoting a safety-first culture and encouraging executives to be actively involved in safety planning and decision-making processes, thereby promoting safety communications in top-down and bottom-up feedback.

Safety is a core business function of the Alameda Contra-Costa County Transit District (AC Transit or District) and all public transit providers. It should be systematically applied to every aspect of service delivery. At AC Transit, all levels of management, administration, and operations are responsible for the safety of their customers and themselves. To improve public transportation safety to the highest practicable level in the state and comply with FTA requirements, AC Transit developed its Agency Safety Plan (ASP).

To ensure that the necessary processes are in place to accomplish both enhanced safety at the local level and the goals of the National Public Transportation Safety Plan (NSP), the District has adopted this PTASP and the tenets of SMS including a Safety Management Policy (SMP) and the processes for Safety Risk Management (SRM), Safety Assurance (SA), and Safety Promotion (SP), per 49 U.S.C. 5329(d)(1)(A)1. While safety has always been a primary function at AC Transit, this document lays out a process to fully implement SMS over the next several years that complies with the PTASP final rule, as amended.

Overview

The district is the largest public bus-only transit agency in California. Based in the San Francisco Bay Area's East Bay, and headquartered in Oakland, CA. AC Transit was formed in 1960, assuming the storied transit routes of the Key System and its predecessors, which over the previous 100 years, carried passengers via horse-drawn rail streetcars, electric streetcars, ferries, and buses. AC Transit has an established commitment to preserving and improving the quality and quantity of transit service for 1.5 million East Bay passengers that populate our 364 square mile service area,

[1] Federal Register, Vol. 81, No. 24

which includes Alameda and Contra Costa counties' 13 cities and adjacent unincorporated areas of the East Bay.

AC Transit is an industry leader in providing public transit solutions that connects the East Bay communities with regional destinations including 16 other public and private bus systems, 25 BART stations, six Amtrak stations and five ferry terminals. The district uses its Strategic Plan to concentrate time and resources on primary focus activities. Elements of the Strategic Plan consist of: Core Values, Vision and Mission Statements, Goals and Initiatives to organize the direction of the district's work efforts.

Vision Statement:

AC Transit is valued as a leader that helps the Bay Area thrive by connecting East Bay communities to each other and to regional destinations.

Mission Statements:

We deliver safe, reliable, sustainable transit service that responds to the needs of our customers and communities.

District Goals

AC Transit Core Values						
Safety	Service	Environmental Sustainability	Equity	Innovation	Integrity	Trust

1. Safe and Secure Operations
2. Convenient and Reliable Service
3. Financial Stability and Resiliency
4. High-Performing Workforce
5. Strong Public and Policymaker Support
6. Environmental Improvement
7. Prioritize Diversity, Equity, Inclusion, & Accessibility

Purpose

AC Transit operations depend upon the proficiency and well-being of its employees and the maximization of its capital resources. To ensure the preservation and safety of these resources, AC Transit adopted a comprehensive safety management system, with system safety as its foundation, as the model for safety management and continuous improvement in safety performance.

AC Transit's Public Transportation Agency Safety Plan (PTASP) serves as a guideline in the establishment of technical and managerial safety strategies for the identification, assessment, and control of safety risks to AC Transit customers, employees, contractors, and the public who may come into contact with the system. The plan is updated and posted to AC Transit's website.

- States the district's commitment and philosophy to actively sustain safe transit operations.
- Establishes and manages safety activities intended to minimize risk and loss of District resources, and to maximize the safety of our customers, our employees, contractors, and the public.
- Integrates the safety function throughout the district's organizational structure, from the General Manager to managerial staff, to front-line employees.
- Defines organizational safety responsibilities and accountabilities.
- Provides for the documentation and verification of safety activities.
  Evaluates safety activities for continued improvement.

System safety is defined by AC Transit as the district-wide coordinated effort of all divisions to apply operating, technical, and risk management techniques and principles to conserve life and property, prevent and reduce mishaps or incidents and the effects that result, and maintain a safe and healthful work environment.

The PTASP applies to all AC Transit operations; including bus, demand-response transit, and paratransit; all supporting divisions; and to all activities which involve the design, construction, operation, and maintenance of the transit system, including system expansions. Each AC Transit division and department is responsible for the implementation and success of the plan.

Plan Goal and Objectives

Goal

The safety goal is to design, construct, test, and operate a transportation system that attains an optimal level of safety by effectively managing safety risks. This goal is reflected in the planning, design, construction, operation, and maintenance phases. District staff are directed toward achieving this goal within the district's strategic goals and constraints.

Achievement of the goal is accomplished, in part, through the application of a formal system of analytical techniques and methods for the identification, analysis, evaluation, and resolution of safety risks.

Primary Objectives

The primary objectives of the PTASP are to document and achieve a level of safety performance that meets or exceeds our safety performance targets (SPTs) and the operating experience of similar bus transit systems in the United States through:

- Analyzing employee and passenger injuries
- Using industry standards for the identification, assessment, evaluation, and mitigation of hazards that may impact customer and employee safety and those that may be affected by bus operations.
- Incorporating safety, fire protection, emergency management, and cybersecurity measures into design criteria and specification development in all transit system designs
- Analyzing vehicle collisions, mishaps, and other incidents
- Training AC Transit personnel in safety-related programs and ensure that safety certifications are up to date and maintained.
- Complying with CAL-OSHA rules, local codes, and federal, state, and local environmental regulations
- Increasing and strengthening community engagement in the safety of the transit system by involving and educating community organizations and schools in bus safety
- Promoting transit safety through campaigns, promotional contests, and other activities
- Improve planning and projections for fiscal resources by tracing and analyzing historical data.
- Coordinating and communicating safety risks with jurisdictional partners such as the Metropolitan Transportation Commission (MTC), and others, as necessary

Plan Integration and Lines of Authority - 673.23(d)

The PTASP responsibilities at each organizational level are outlined as follows:

General Manager – is the Accountable Executive (AE) and is vested with the primary responsibility for the district's activities and overall safety performance. The General Manager has designated the Safety Management Systems Advisory Committee with the responsibility for developing, implementing, evaluating, and maintaining the District PTASP.

Chief Officers and Executive Directors are responsible for upholding and promoting safety policies, developing safety performance goals, and holding department directors and managers accountable for safety performance within their respective divisions/departments.

Chief Safety Officer - an adequately trained individual employed by the district who is responsible for safety and reports directly to the transit agency's Accountable Executive.

Department Directors and Managers are directly accountable and responsible for implementing and evaluating safety performance within their functional area. This responsibility includes determining and implementing countermeasures to counteract safety risks and problems impacting AC Transit's safety performance.

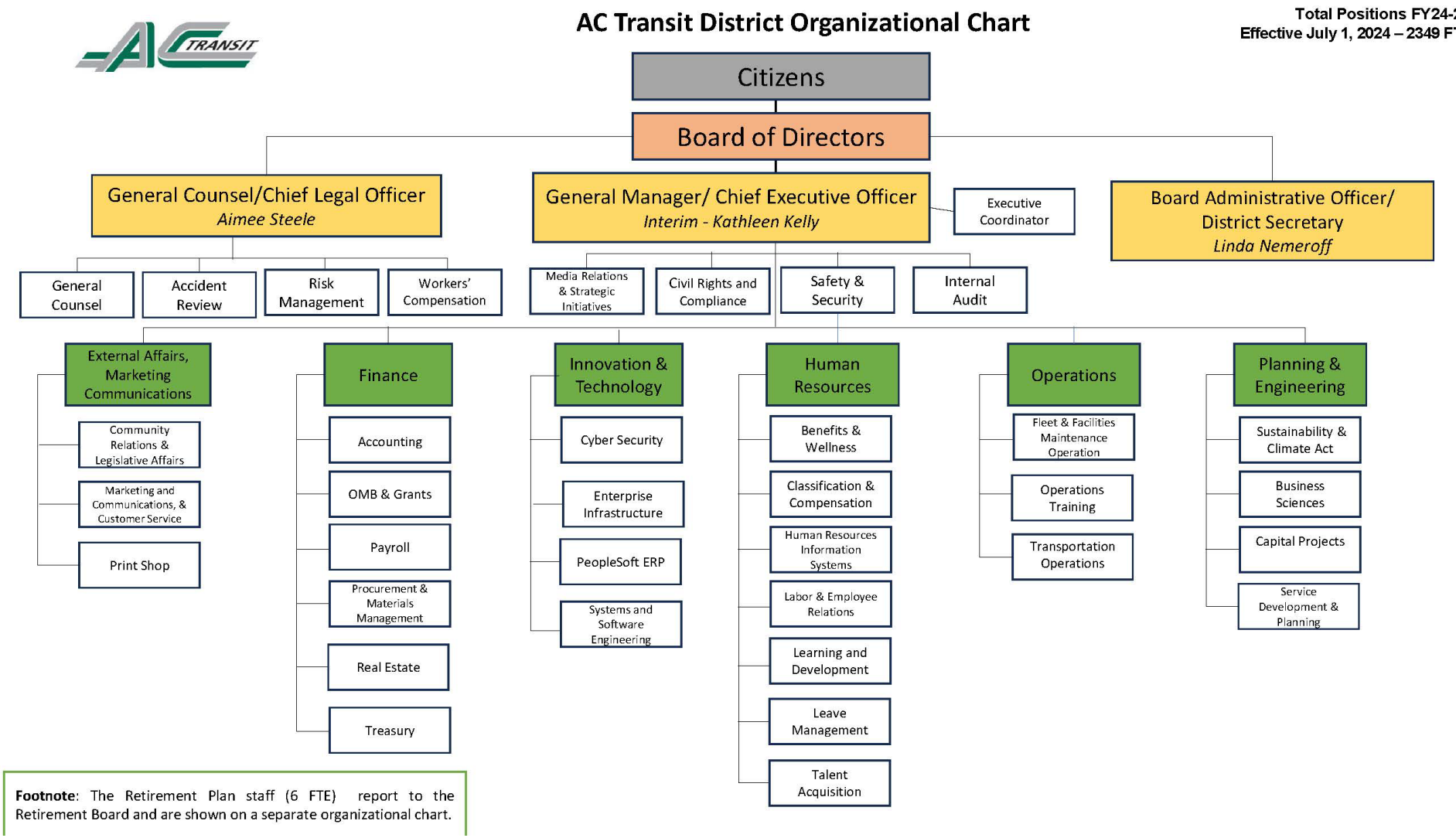
Supervisors and Lead Staff—Supervisors and Lead staff are accountable and responsible for implementing the PTASP, including the safety performance of all personnel and equipment under their supervision, developing and maintaining control measures, and reporting all mishaps and incidents in accordance with the PTASP.

District Personnel—All personnel are responsible for performing their work safely, following procedures and rules, calling attention to circumstances that may impact safety performance, and reporting near misses and incidents to their supervisor in accordance with established requirements for the protection of themselves, co-workers, customers, facilities, and equipment.

District Profile

Transit Agency Name	Alameda Contra-Costa Transit District (AC Transit)
Transit Agency Address	1600 Franklin Street, Oakland, CA. 94612
Name and Title of Accountable Executive	Kathleen Kelly, Interim General Manager
Chief Safety Officer	Marla Lee Blagg, Chief Safety and Security Officer
Mode(s) of Service Covered by This Plan	Motor Bus, Commuter Bus, Bus Rapid Transit, Demand Response
List All FTA Funding Types	5307, 5309, 5339
Mode(s) of Service Provided by the Transit Agency (Directly operated or contracted service)	Motor Bus – Direct Operated (MB-DO) Commuter Bus – Direct Operated (CB –DO) Motor Bus – Purchased Transportation (MB-PT) Demand Response – Direct Operated (DR-DO) Bus Rapid Transit – (RB-DO)

Agency Organization



Footnote: The Retirement Plan staff (6 FTE) report to the Retirement Board and are shown on a separate organizational chart.

Safety Management System (SMS) Advisory Committee (PTASP only)

The SMS Advisory Committee was established to manage resources, human resources, and capital, as well as changes that manage safety activities and support the strategic goal of safe and secure operations. Through various complex processes that involve planning, communication, and implementation strategies, the committee involves key stakeholders to receive feedback on current and evolving circumstances. This offers flexibility and adaptability to the Safety Management System, including leadership discussions using employee involvement.

SMS Advisory Committee Members

Department	Title
Safety	Chief Safety and Security Officer
	Safety Manager
	Public Safety and Security Manager
	Safety Administrator
Operations	Chief Operating Officer
	Director of Maintenance
	Director of Transportation
	Training and Education Manager
Finance	Chief Financial Officer
	Director of Management & Budget
	Director of Procurement and Materials
Planning & Engineering	Executive Director of Planning and Engineering
	Director of Business Sciences
Innovation & Technology	Chief Information Officer
External Affairs	Executive Dir. of External Affairs, Marketing & Com.
	Director of Legislative Affairs & Community Relations
Risk Management	Claims and Liability Manager
Civil Rights & Compliance	Director of Compliance
Human Resources	Executive Director of Human Resources
Legal	General Counsel

PLAN DEVELOPMENT, APPROVAL, AND UPDATES

Development and Approval - 673.11(a)(1) / 673.11(a)(5)

AC Transit's Safety Management Systems (SMS) Advisory Committee is empowered and authorized by the General Manger to develop, implement, and administer the PTASP to meet the Federal requirements of 49 CFR Part 673. Appendix 1 provides the FTA requirements matrix and mapping to the PTASP elements. The District's General Manager shall submit to the AC Transit District Board the Public Transportation Agency Plan for approval.

Certification of Compliance - 673.13(a)(b)

Name of Entity That Drafted This Plan	Alameda Contra-Costa Transit District (AC Transit)	
Signature by the Accountable Executive	**Signature of Accountable Executive**	Date of Signature for this Revision
	Kathleen Kelly, Interim General Manager	TBD
Approval by the Board of Directors or an Equivalent Authority	**Name of Individual/Entity That Approved This Plan**	Date of Approval
	AC Transit Board of Directors	05/13/2020
	Board Document Staff Report 20-151	
Certification of Compliance	**Name of Individual/Entity That Certified This Plan**	Date of Certification
	Safety Management System Advisory Committee	December 2024
	Board Document Staff Report	TBD

Plan Review and Management of Change

The Safety Management Systems (SMS) Advisory Committee is an ad-hoc committee that may be responsible for reviewing the PTASP annually and/or verifying that it remains current and effective. The Chief Safety Officer will conduct the annual review of the plan starting fiscal mid-year and ending the same fiscal year. The focus of the evaluation is to:

- Evaluate current safety tasks and initiatives for appropriateness.
- Refine and improve task descriptions and activities.
- Identify new tasks and initiatives that may be required.
- Define organizational responsibility for accomplishing safety-related tasks, including reporting hierarchies.
- Incorporate organizational, operational, or legislative changes.

Changes in the transit system operational configuration; significant system modification; management organization; changes to processes that affect safety, compliance with new or revised FTA regulations, the environment in which the transit system operates; safety policies, goals, or objectives; or regulatory requirements may require revision of the PTASP and/or its implementation. Revisions, if necessary, are coordinated by the Safety Department and reviewed

by the SMS Advisory Committee. The General Manager approves annual updates, and ATU Leadership is then documented under Version Control. Annual updated activities are shared with the Board under a staff report.

SAFETY PERFORMANCE TARGETS - 673.11(a)(3)

The district has established Safety Performance Targets (SPTs) that forecast specific numerical targets based on the safety performance measures established by FTA in the National Public Transportation Safety Plan. The district has adopted FTA's safety performance measures based on revised FTA guidance, which include numbers and rates for: (1) Fatalities, (2) Injuries, (3) Safety Events, (4) Assaults on Transit Workers, and (5) System Reliability.

The district has coordinated with the Metropolitan Transportation Commission (MTC) and the local Metropolitan Planning Organization (MPO) to the maximum extent practicable to assist with reporting the District's SPTs. At a minimum, the FTA requires each transit agency to make its safety performance targets available to the State and local MPO.

Safety Performance Measures

In compliance with the latest FTA regulations and guidance requiring the development of a forecasted reduction in newly defined SPTs and understanding that providing forecasted reductions in SPTs at this time would be premature based on gaps in data collection and processes, AC Transit is applying the following methodology.

SPTs are calculated based on the three-year rolling average of NTD data. They will be tracked for continuous improvement from reporting years 2023 through 2025 to develop reasonable forecasts based on currently prescribed Key Performance Indicators (KPIs). Forecasts will be adjusted based on real-world and aspirational targets and reported in the PTASP for approval and acceptance by the appropriate authorities.

As the largest public bus-only transit agency in California, AC Transit is responsible for providing safe and secure transit services to its passengers, employees, and the public. The district will continue to gather and analyze data to develop achievable KPIs in accordance with industry best practices, internal recommendations, and consultation with subject matter experts (SMEs) and peer agencies.

Safety Performance Targets (3-Year Average)

Mode of Transit Service	Fatalities		Injuries		Safety Events		Assaults on Transit Workers		Distance Between Mechanical Failures	
	Total	Rate/100K	Total	Rate/100K	Total	Rate/100K	Total	Rate/100K	Total	Miles (Avg)
Fixed Route	0	0.00	21	3.20	18	2.67	1	0.11	303	12,008
Demand Response	0	0.00	3	0.09	3	0.09	0	0.00	69	77,245

Safety Performance Measures

All Applicable Transit Agencies

All agencies subject to the PTASP regulation must set Safety Performance Targets (SPTs) for these 14 general safety performance measures in the National Safety Plan

- Agencies must set individual SPTs for each modal group they operate
- FTA does not require a specific target-setting methodology for these measures

General Safety Performance Measures	
1a: Major Events	2.1: Transit Worker Fatality Rate (NEW)
1b: Major Event Rate	3a: Injuries
1.1: Collision Rate (NEW)	3b: Injury Rate
1.1.1: Pedestrian Collision Rate (NEW)	3.1: Transit Worker Injury Rate (NEW)
1.1.1: Vehicular Collision Rate (NEW)	4a: Assaults on Transit Workers (NEW)
2a: Fatalities	4b: Rate of Assaults on Transit Workers (NEW)
2b: Fatality Rate	5: System Reliability

The district will identify new data collection processes for the new Safety Performance Targets identified in 2025. The district will collect data for three consecutive years before establishing a baseline and predictive modeling.

Target Setting Coordination

AC Transit coordinates with the Metropolitan Transportation Commission in selecting the district's safety performance targets. The following table identifies the State representative and transmission dates with the Metropolitan Planning Organization.

	Metropolitan Planning Organization Name	Submitted
Targets Transmitted to the Metropolitan Planning Organization	Metropolitan Transportation Commission	TBD

Additionally, Transit Asset Management (TAM) is a key method for agencies to monitor potential safety concerns with assets as they are used and age toward their useful life benchmarks (ULBs). AC Transit will strive to verify that it meets compliance requirements in developing the biennial updates to the TAM Plan, including its TAM performance targets and measures.

SAFETY MANAGEMENT POLICY - 673.23(a)

AC Transit's Board Policies and Administrative Regulations have been developed to assist the Board of Directors, Board Officers, and employees carry out their respective roles and functions

and properly govern, manage and guide the district's business activities. Other individuals or groups specifically referenced shall also comply with District policies and regulations.

Board Governance

Board Policies and Administrative Regulations

- Governance & Administration
- Human Resources
- Finance
- Operations
- Planning & Service Development
- Legal Matters
- Conflict of Interest and Ethics

Regularly agendized Staff Reports are scheduled for the Board of Directors on a monthly, Bi-Monthly, quarterly, and annual basis. Staff Reports provide detailed information to the Board of Directors on various topics related to Safety Management Systems by the following departments Operations, Planning, Human Resources, Finance and Audit, External Affairs, and Compliance.

Safety Management System Policy

AC Transit is committed to planning and delivering bus service in ways that promote the health and safety of our customers, our employees, contractors, and the public. This commitment sets the direction for developing a Public Transportation Agency Safety Plan (PTASP) based on the Safety Management Systems approach. The AC Transit Public Transportation Agency Safety Plan includes the processes and procedures necessary for implementing Safety Management Systems and processes for safety risk management, safety assurance and safety promotion. Safety policies and practices are distributed via talk topics to department managers to give to their employees. Transportation and service bulletins are distributed via email to management to give employees to post on bulletin boards for all employees to read. AC Transit's Board policy No. 480 Safety Management Systems Policy is located under the Governance Risk Management & Mitigation section.

SMS Board Policy 480

AC TRANSIT	**Board Policy No. 480** **Safety Management Systems Policy**
ADOPTED: 4/24/2019 **RECENT AMENDMENT:** N/A **SEE ALSO:**	**SUBJECT CATEGORY:** SECTION 400, OPERATIONS **SUBSECTION:** Risk Management & Mitigation **CONTROL DEPARTMENT:** OPERATIONS, CHIEF OPERATING OFFICER

Employee Safety Reporting Program (ESRP) - 673.23(b)

The district and its respective bargaining units have provisions to protect employees when reporting safety matters. Employees can request a safety assessment (RSA) by submitting a report

form to their supervisor, management, or the safety department or report anonymously through the MY ACT website. The form is available in hard copy and electronic formats and accessible to all employees. When an employee perceives a hazardous condition, they complete the form and submit it to management or anonymously to the safety department for a request for a safety assessment. This is part of the Safety Management Policy and Safety Risk Management components of the PTASP.

Other opportunities to report safety concerns are through division safety committees. The Safety staff facilitates site-specific Safety Committees that meet monthly. Committee members represented by District staff and Union representatives discuss safety and security matters of mutual interest and concern. The Safety Committee jointly identifies safety issues or conditions to be reviewed and prioritized for corrective action(s). This is the Safety Risk Management process of the PTASP. The Safety Department will provide technical assistance and/or act as subject matter experts utilizing risk ranking or other safety management systems tools to measure, monitor, and evaluate the corrective actions as part of the PTASP assurance process.

An employee or supervisor reports injuries and/or accidents when they occur. Management reviews and follows up on injuries by filling out an investigation report. The Accident Reduction Committee reviews and analyzes documents. On-road situations can be reported directly to the Operations Control Center (OCC) by the operator and addressed accordingly. Defect cards are provided to operators and filled out daily by every operator. The cards identify safety issues on the bus for the maintenance department to address.

SAFETY RISK MANAGEMENT - 673.25

Safety Hazard Identification - 673.25(b)

AC Transit employs various strategies to identify, assess, and resolve system safety risks. The programs in place are the Request for a Safety Assessment form, Division Safety Committees, Accident and Injury Reporting, and OCC radio communications to report real or perceived issues and incidents. The specific strategy employed depends on the specific hazard and what aspect of the district's operation might be impacted by it.

New Service, Equipment, and Renovations

Where applicable, formal risk ranking, safety certification, or hazard assessments are conducted prior to implementing new and upgraded systems equipment, during the preliminary engineering phase of renovations, and on all projects that include safety critical systems and changes to bus operations, inclusive of alterations to and the addition of new bus routes. These assessments are undertaken to identify safety critical systems and document any hazardous components, interfaces, environmental factors, and safety risks associated with operations, maintenance, and emergency procedures, as well as their effect on passengers, the public, employees, equipment, and infrastructure.

Historical Data and Trend Analysis

The district's incident data provides insight into what has happened in the past and what safety risks and hazardous conditions should be reviewed and considered for mitigation. This may include reviews of rule violations, bus collision histories, and employee and passenger injury trends.

Design Reviews

The SMS Advisory Committee participates in design reviews to identify conditions and events that may be hazardous to employees, customers, or those who may utilize the district's bus service. The Chief Safety and Security Officer is identified as the Chief Safety Officer and manages the transit agency's safety function, such as compliance with federal, state, and local regulations, and overseeing the safety requirements for transit projects. This includes continuously driving the safety management system and risk management process throughout the safety and security Core Management Functions of design review.

Operating System

The district conducts formal and informal operational and occupational safety evaluations of its facilities, equipment, and operations to identify hazards proactively.

Occupational Safety and Health Evaluations

The district's Safety Department is tasked with providing a safe and healthful working environment for its employees and reducing the likelihood and severity of accidents. The Department Programs emphasize the proactive identification, evaluation, and control of safety hazards arising within and out of the occupational environment. Corrective action plans are implemented where indicated. Systems, processes, and facilities are continually reviewed for hazards. The district employs surveys, inspections, audits, committees, and injury causation evaluations and solicits employee input as part of its hazard review.

Worker safety programs include an Injury Illness Prevention Program, Violence Prevention Program, Safety Training, Auditing, Investigations, Reporting, and Infectious disease program. The Human Resources Infectious disease procedures and the COVID program are communicated at a minimum once a year to all employees. A COVID SMART plan are the protocols in place for mitigations and minimizing exposure to infectious disease.

Industrial Hygiene surveys assess the potential degree of employee exposure to environmental, chemical, biological, and physical agents encountered in the workplace. The results of these surveys are then used to determine the necessary corrective actions, if any, including the implementation of engineering and administrative controls and/or the required use of personal protective equipment (PPE). The District's Safety Department reviews employee injuries and illnesses, which the appropriate safety committee also reviews.

Inspections

The Safety Department safely inspects all district operations and maintenance facilities at least once per year to ensure the safety of its employees and the public. Due to the nature of the hazards and potential risks associated with their operations, individual maintenance divisions undergo quarterly inspections. Inspection reports list the hazards found during the inspection. Follow-up inspections, remedial actions, and reports are logged.

Accident/Incident Investigations and Data

Accident and incident reports, injury and illness reports, and workers' compensation databases are additional methods the district uses to identify hazards. The Accident Reduction Committee (ARC) meets monthly to analyze accident/incident trends and provide leadership in implementing appropriate mitigation controls. Post-incident review and analysis of all major accidents and incidents is conducted by stakeholders from the District's Transportation, Operations, Training, Legal and Labor Departments to develop a consensus determination of causal factors and the appropriate organizational response, including retraining and discipline. The Safety Department will assist in final determinations if consensus is not met.

All incidents are investigated by field supervisors at the scene, followed by an additional postmortem investigation as warranted by the facts and circumstances of the respective incident. Video review may be included during accident review and determinations.

Audits

Audits are conducted by the district's internal Audit Business Unit and Safety Department. The Internal Audit Department reviews the PTASP to ensure compliance with current federal, state, and local requirements. They will also review and evaluate the district's SMS implementation and identify improvement opportunities. The Safety Department ensures that safety audits meet Federal, State, and local requirements by using Safety Management System tools and auditing the PTASP processes such as Safety Management Policy, Safety Risk Management, and Safety Assurance. The Safety Department develops and designs the audit program based on previous safety issues, mandates, and implementation of safety management systems. The audit results are available for review by the required authority or governance committee.

Ad Hoc Hazard and Incident Reporting

All District employees are responsible for reporting hazardous conditions to their immediate supervisor or calling the Operations Control Center (OCC) as circumstances require. Hazards reported to the OCC are logged into Origami Data accumulated and used to identify actual and potentially hazardous conditions that may adversely impact the safety of passengers, employees, and persons interacting with the district. Data maintained and analyzed include, but was not limited to, injuries, potentially hazardous equipment use and failures, and rules, regulations, and procedures violations. Hazard-related data is tracked longitudinally to identify trends that might impact the district's system safety goals and objectives.

Hazards that are determined by Operations and/or the Safety Department to be an immediate safety threat, such as malfunctioning wheelchair ramps or bus door sensors, are immediately corrected. These incidents are sent to the appropriate manager or safety administrator for resolution. Members of the public may also report their concerns by contacting Customer Service, the Risk Management Department, or Field Supervision. These contacts are logged and routed to the correct person for resolution.

Safety Risk Assessment - 673.25(c)

AC Transit measures and mitigates safety risks by performing safety risk assessments on its assets through its Risk Ranking Tool and the Transit Asset Management Plan. The ranking tool categorizes the likelihood, severity, and impact factors affecting agency safety risks. As the Transit Asset Management Plan outlines, condition ratings and useful life benchmarks prioritize the severity of safety risks on physical assets.

Hazard Categories

The district generally identifies system safety hazards by conducting formal project hazard assessments. These include operating system investigations and evaluations of incidents that have resulted in or have the potential to result in injury, fatality, or system loss. Operating system incident, accident, and/or mishap trend analysis results are categorized formally. The hazard classification system is used to determine the acceptability of assuming the risk associated with identified hazards and the necessity of implementing risk controls to reduce the hazard to acceptable levels or to eliminate the hazard.

Hazard categorization involves classifying the identified hazards in terms of severity and probability. The district has adopted the Risk Assessment and Hazard Risk Index matrixes developed by the United States Department of Defense document, Standard Practice for System Safety, MIL-STD-882E, as its guideline for determining the hazard severity and probability.

Hazard Severity

Hazards are rated according to their effect on District customers, employees, the public, and operations. The hazard severity rating is a subjective measure of the worst-case consequence that would result from design deficiencies, component failure or malfunction, human error or negligence, environmental conditions, or operations or maintenance practice and procedure deficiencies.

Hazard Severity Rating

Severity	Characteristics			
	People	Equipment/Services	Financial	Reputational
I Catastrophic	Multiple fatalities and/or numerous severely injured	Total loss of equipment or system disruption, requiring months to rectify	Estimated loss from the incident more than $7,000,000	Ongoing media coverage, severe to irreparable reputational damage, governmental intervention, Weeks to Months
II Critical	Singular fatality and/or several severely injured	Significant loss of equipment or system disruptions, requiring week to rectify	Estimated loss from the incident in the range of $3,000,000 to $7,000,000	Prolonged media coverage, serious reputational damage, sustained government involvement, Days to Weeks
III Moderate	Severe injuries and/or numerous minor injuries	Some loss of equipment or system disruption, requiring < 7 days to rectify	Estimated loss from the incident in the range of $500,000 to $3,000,000	Adverse media coverage, reputational damage, government involvement, Days
IV Minor	Severe injury and/or multiple minor injuries	Some loss of equipment, no system disruption, requiring < 24 hours to rectify	Estimated loss from the incident in the range of $15,000 to $500,000	Local media coverage and some reputational damage, Day
V Insignificant	Minor injuries or No injuries	Minor damage to equipment, no system disruption, no immediate repair necessary	Estimated loss from the incident is up to $15,000	No adverse media coverage or reputational damage

Hazard Probability Rating System

The probability that a hazard will occur during the planned life expectancy of the system element, sub-system, or component is described qualitatively in potential occurrences per unit of time, events, population, items, or activity. A qualitative hazard probability is derived from research, analysis, and evaluation of safety data from the district's operational experience or from historical data from comparable agencies.

Hazard Probability Rating System

Probability Level	Specific Individual Item	Fleet or Inventory	Frequency
Frequent	Likely to occur frequently in the life of an item	Continually experienced	> 25 incidents per annum (Weekly)
Probable	Will occur often in the life of an item	Will occur regularly	> 12 to < 25 per annum (Monthly Plus)
Likely	Will occur several times in the life of an item	Will occur several times	>5 to < 12 per annum (Monthly)
Occasional	Likely to occur sometime in the life of an item	Will occur a few times	> 1 to < 5 per annum (Annually)
Remote	Unlikely but possible to occur sometime in the life of an item	Possible to occur in the life of the system	> .0001 to < 1 per annum (Rarely)
Improbable	So unlikely, it can be assumed that occurrence may not be experienced	It can be assumed it will not occur	< .0001 per annum

Hazard Risk Index

Viewed in relation to one another, the hazard severity and hazard probability properties measure a hazard's magnitude and allow for the prioritization of applying control measures. Hazards are then analyzed, evaluated, and treated based on the likelihood that an event will occur and the potential severity of the consequence. The Hazard Risk Index is derived from considering a hazard's severity and probability. The Hazard Risk Index measures the acceptability or unacceptability of the hazard.

The Hazard Risk Index enables the district's management to properly assess the amount of risk involved by viewing the hazard relative to what it would cost the district (in terms of man-hours, funding, operations, schedule, etc.) to reduce the hazard to an acceptable level. The following matrix identifies the Hazard Risk Index based on hazard category and probability and the criteria for defining further action based on that index.

Risk Index Rating

Frequency of Occurrence	Severity Category				
	1 Catastrophic	2 Critical	3 Moderate	4 Minor	5 Insignificant
(A) Frequent	1A	2A	3A	4A	5A
(B) Probable	1B	2B	3B	4B	5B
(C) Likely	1C	2C	3C	4C	5C
(D) Occasional	1D	2D	3D	4D	5D
(E) Remote	1E	2E	3E	4E	5E
(F) Improbable	1F	2F	3F	4F	5F

Risk Decision Criteria

Risk Decision Criteria		Rating
	Unacceptable	1A, 1B, 1C, 2A, 2B, 3A
	Undesirable - Executive Level Review Required	1D, 2C, 2D, 3B, 3C, 4A, 4B
	Acceptable w/ Review - Management Level Review Required	1E, 1F, 2E, 2F, 3D, 3E, 4C, 4D, 5A, 5B
	Acceptable - Acceptable without further review	3F, 4E, 4F, 5C, 5D, 5E, 5F

Safety Risk Mitigation (SRM) - 673.25(d)

The district's Division Safety Committees are the principal body for assessing and resolving identified hazards within the district's operating system at the lowest level. They also act as safety advocates and ambassadors. Based on the ranking tool, the committee establishes control measures to reduce the likelihood and severity of risks. The SMS Advisory Committee is notified when physical assets are mitigated through the agency's Capital Improvement Program. Below is an example of the Risk Index Dashboard, which summarizes the risk score by level and probability/severity.

Example Risk Index Dashboard

If the SMS Advisory Committee conducts a formal assessment, the Hazard Risk Index is used to assist the decision-making process in determining whether a safety risk should be eliminated, controlled, or accepted. If the potential for an accident/incident reveals a Category 1 (Catastrophic) occurrence with a Level A (Frequent) probability, the system safety effort is directed toward eliminating the hazard through design, redundant hazard control measures, or avoidance. A catastrophic (Category 1) or critical (Category 2) safety risk may be determined to be tolerable if it is determined that the likelihood of occurrence is highly improbable. A probable or Level B safety risk may be tolerated if it is demonstrated that the result of the occurrence would be minor (Category 4) or minimal (Category 5). This rubric provides a basis for logical risk management decision-making through the informed consideration of the hazard's severity and probability. As safety risks are identified, various strategies are employed to control and reduce the risks to acceptable levels. Unacceptable and undesirable risks must be reported to the Accountable Executive for determination.

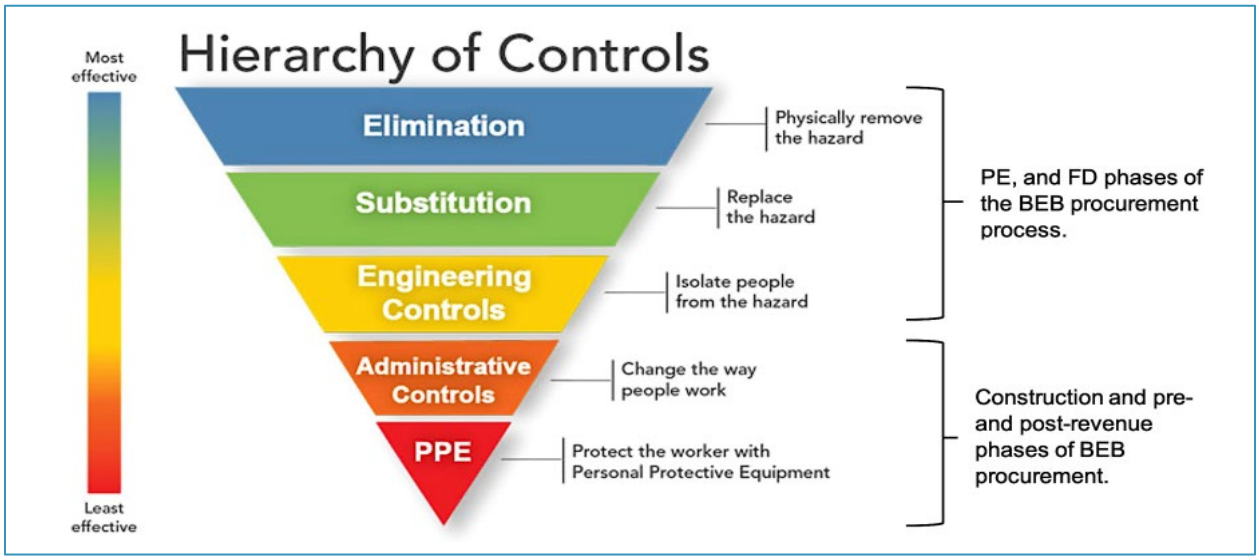
Hierarchy of Controls in Risk Mitigation

SRM aims to reduce the assessed risk rating to a level acceptable to AC Transit. While the mitigation process may not *eliminate* the safety risk, Subject Matter Experts (SME) input emphasizing the mitigation will assist in reducing the hazard to the lowest acceptable level. AC Transit may consider obtaining input from internal and/or external SMEs to verify that the selected safety risk mitigation is appropriate. Information from multiple resources will potentially help prevent unintended secondary effects or create new hazards because of the mitigation (safety rule testing).

Safety risk mitigation can be accomplished using any one or combination of the following:

- Elimination
- Reducing the likelihood of occurrence of the potential consequence(s) of the hazard
- Reducing the severity of the potential consequence(s) of the hazard

AC Transit will follow the National Institute for Occupational Safety and Health (NIOSH) hierarchy of controls (see figure below) when identifying the best methods for mitigating hazards.



Hierarchy of Controls

Elimination or Minimization of the Hazard

The SMS Advisory Committee participates in deciding to eliminate or minimize the hazard by the following:

Design for Minimum Risk—A design change will eliminate the hazard if feasible. If design revisions cannot eliminate the identified hazard, the hazard will be reduced to an acceptable level through design selection, according to the Risk Assessment Criteria.

Incorporate Safety Devices—If design revisions or selection cannot eliminate or adequately reduce the identified hazard(s), the district will reduce the hazard to an acceptable level using fixed, automatic, or other appropriate protective safety design features or devices.

Provide Warning Devices – When both design and safety devices fail to effectively eliminate or adequately reduce the identified hazard(s), warning devices and signage will be used to provide warning signals to the public and District personnel. Warning signals and their implementation will be designed to minimize the probability of incorrect interpretation of their meaning and will be standardized within similar types of systems and applications.

Substitution – Replace the Hazard

Substitution is using a safer alternative to the source of the hazard.

When considering a substitute, AC Transit will endeavor to compare the potential new risk of the substitute to the original risk (safety rule testing). Reviews will consider how the substitute will combine with other operations. AC Transit understands that adequate substitutes reduce potential harmful effects and do not create new risks.

Use of Engineering Controls

Engineering controls reduce occupational injury and illness burden for the district's employees and customers. They also protect the workforce by removing or reducing hazardous conditions such as dust, excessive noise, or isolating workers from the hazard. Examples include driver barriers, bus striping, or office partitions to shield airborne emissions from employees. Well-designed engineering controls can be highly effective in protecting the district's workforce.

Driver Barrier Example

Use of Administrative Controls

Where identified hazards cannot be eliminated through design selection or reduced to acceptable levels through safety and warning devices, the district will implement appropriate procedures and training. However, without specific direction from the District's Executive Staff, no warning, caution, or other written or pictorial advisories may be used as the sole risk reduction method for Category 1 and 2 hazards.

Use of Personal Protective Equipment

Provision of Personal Protective Equipment (PPE) appropriate to the hazard – If the identified hazard cannot be eliminated or adequately controlled with administrative controls, personal protective equipment may be needed. The district requires training on the proper use of the equipment prior to employees being placed in environments requiring the use of such equipment.

Tracking

The District's SMS Advisory Committee tracks and analyzes identified hazards within the district's sphere of operations until resolution. Safety risks related to capital projects (such as BRT, equipment procurements, and system renovations and upgrades) are reviewed and resolved by the Capital Programming Committee, which was specifically created to review and prioritize project requests.

Executive Staff are advised of Category I and II level hazards that cannot be acceptably resolved by the Capital Programming Committee to an acceptable level for final resolution.

Capital Investment Prioritization

AC Transit uses its Capital Improvement Program (CIP) process to prioritize its investments. The program's process includes category factors when considering the investment priority. The basic unit of the prioritization process is the project request that is created by District staff and have a set of required fields to assist in the prioritization process.

Prioritization

Priority 1	Description
Safety	Requests that concern safety or security critical assets or initiatives. This applies to the safety of both riders and employees.
Compliance	Requests that are necessary to fulfil regulatory compliance requirements.
Maintenance	Requests for maintenance of existing assets. This encompasses the bulk of state of good repair requests.
Business Case	Requests that can show a quantifiable benefit from their implementation. These requests are generally not necessary from a maintenance standpoint but could save the District money in an identifiable and specific way.
Enhancement	Enhancement of existing assets or addition of new assets that are not required for maintenance purposes. Expansion projects.

The asset inventory and condition assessment are used in this step to create project requests based on the asset age or condition (as applicable to that asset class) for rehabilitation or replacement of the assets that are indicated within the fiscal period. Requests can cover individual or groups of assets, and include a cost estimate, sponsoring department and project manager information, and any relevant documentation.

FTA General Directive

AC Transit has established the Joint Labor Management Safety Committee to focus efforts on the continuing safety risks associated with assaults on transit workers. The task force meets Tri-annually on a scheduled basis to address agenda topics and meet the following FTA general directive 24-1 requirements:

- Transit agencies must use the Safety Risk Management process documented in the PTASP to assess transit worker assaults.
- Identify safety risk mitigations to reduce the likelihood & severity of consequences in the safety risk assessment.
- Provide information to FTA regarding how the agency assesses, mitigates, and monitors the safety risk associated with assaults on transit workers.

Cybersecurity Risk Mitigation (CRM) - 673.25(e)

Cybersecurity threats pose significant risks to transit operations, requiring integration into AC Transit's overall Safety Risk Management framework to ensure the protection of operational systems, passenger information, and infrastructure.

Implementation

- Conduct comprehensive cybersecurity risk assessments aligned with FTA, CISA, NIST, and industry best practices.
- Integrate cybersecurity risk evaluation into existing hazard identification and mitigation processes.

- Perform quarterly penetration testing and vulnerability assessments to identify potential security threats.
- Implement real-time cybersecurity monitoring for proactive threat detection and incident response.
- Conduct biannual cybersecurity drills, simulating real-world attack scenarios to assess preparedness and response capabilities.

Incident Notification, Investigation and Reporting - 673.27(B)(3)

External Notifications and Thresholds

All external notifications of significant transit incidents are initiated by AC Transit's Operations Control Center in accordance with the reporting thresholds listed below. The Chief Safety Officer or designee is the primary point of contact with all external agencies in the event an investigation is initiated by any of the external agencies and for the provision of updates and additional information, as required by the incident. All initial notifications will include the following:

- Brief description of the incident
- Casualties – number of fatalities and/or injuries
- Date, time, and location of the incident.

Hyper-Alert Notifications - Everbridge

District management, including the General Manager, General Counsel, Chief Operating Officer, Chief Safety and Security Officer, Director of Transportation, Manager of Media Affairs, and Claims Manager, are notified of any event resulting in injury to passengers or employees, damage to District property, damage to non-District property due to transit operations, disruption of transit services, or any other significant event. All notifications are made via the district's automated Hyper-Alert system and include messaging via text message, email, and telephone calls. Notification lists are maintained by the Operations Control Center and are updated regularly.

Accident Investigations Process

Personnel from the District's Services Supervision initiate investigations of all transportation-related incidents. The event's seriousness determines the level of investigation and may escalate the investigation to include personnel from the Office of the General Counsel. Incidents that do not involve serious injury and/or significant damage usually require only an investigation by the Road Supervisor responding to the scene. Once on scene, the Road Supervisor will:

- Assess the incident.
- Assist local law enforcement, as appropriate.
- Investigate.
- Conduct interviews of involved District personnel, witnesses, and other involved parties as appropriate
- Gather and collect physical evidence.
- Photograph the scene as appropriate.

- Submit a report to the Legal Department based on the information collected.

All Category I-III incidents and hazardous conditions require major incident notification via Hyper-Alert notification to executive-level representatives from Services Supervision, Operations, Transportation, Legal, Safety, and, as appropriate, Maintenance. When notified of a major-level, Category I-III incident, the incident investigation team, inclusive of an investigator from the Office of the General Counsel:

- Conducts an on-site inspection and documentation of the incident or accident scene.
- Reviews reports and/or statements provided by involved personnel.
- Conducts interviews with involved personnel and witnesses, as appropriate.
- Reviews physical evidence.
- Secures District property and vehicles for post-incident inspection.
- Performs systems tests and analysis, if applicable; and
- Coordinates incident/accident reconstruction activities, if applicable.
- Coordinates and/or provides support to the Safety Department or other personnel.

In addition to the on-scene and post-mortem investigations, the District's Accident Review Unit reviews bus collisions and on-board incidents for preventability.

Corrective Action

The Safety Manager reviews all accident reports for potentially serious incidents or conditions. Additionally, when reports and statistics show repetitive trends that result in an inability to meet or exceed District safety goals and objectives, the Safety Manager may initiate an investigation to determine causal factors.

Internal Safety Audits

The internal system safety audits inform district management of the extent to which the district's internal processes, programs, and activities meet planned and published system safety program requirements and goals. Audits are authorized by district senior management. District Safety Staff or its designee conducts the system safety audits on both scheduled and random bases. The following areas may be included in the schedule of audits:

- Goals and Objectives
- Overview of Management Structure
- Program implementation Activities and Responsibilities
- Hazard Management Process
- System Modification
- Safety and Security Certification
- Safety Data Collection and Analysis
- Accident Investigation
- Emergency Management Program
- Internal Safety Audits
- Policy and Rules Compliance
- Facilities and Equipment Inspections
- Maintenance Audits and Inspections
- Training and Certification for Employees and Contractors
- Configuration Management and Controls
- Local, State, and Federal Requirements
  - Hazardous Materials Program
- Procurement Process

The district may conduct both announced and unannounced audits. Announced audits are scheduled to minimize disruption of activities. The Safety Department may perform unannounced audits in which the audit team is informed.

SAFETY ASSURANCE - 673.27 (a)

Emergency Operations Center

The Emergency Operations Center (EOC) provides the ability to respond quickly and in an organized manner that is vital to the continuation of transit service during a special event, emergency, or during the recovery from a catastrophic incident, including but not limited to:

- Earthquake
- Fire
- Flooding
- Hazardous material spill
- Medical emergency
- Pandemic
- Severe weather
- Pandemic
- Severe weather
- Transit related accidents.
- Volcanic activity

AC Transit has an Emergency Operations Plan developed to assist district staff members with key roles and responsibilities during an incident. Emergency Management Response Team staff are required to report to the Emergency Operations Center and use the Emergency Operations Plan to guide their actions in completing assigned tasks. The Emergency Operations Plan comprises multiple documents, identified and described below.

Emergency Operations Plan (EOP)

The EOP provides an overview of AC Transit's organization, policies, and approach to emergency management of an incident; summarizes actions and processes for addressing all hazards; and explains the general concepts of incident management. The EOP also identifies the responsibilities for the Emergency Operations Center (EOC)Team that provides leadership and guidance for the EOP.

EOP Annexes

The annexes provide targeted information, forms, and checklists to direct the activities of AC Transit staff participating in emergency response efforts. The following annexes are included in this Emergency Operations Plan, and are designed to be stand-alone documents useable by staff:

- Annex A: Emergency Operations Center Guidance and Forms
- Annex B: Emergency Operations Center Checklists
- Annex C: AC Transit Forms and Procedures
- Annex D: Miscellaneous Information, including authorities for emergency management.

Cybersecurity Compliance & Safety Assurance - 673.27 (b)

To ensure ongoing cybersecurity resilience, AC Transit will incorporate cybersecurity compliance measures into the Safety Assurance framework, ensuring robust monitoring and governance.

Implementation

- Establish a cybersecurity compliance review process within PTASP's Safety Assurance framework.
- Integrate cybersecurity incidents into the existing safety reporting system, ensuring tracking and resolution.
- Strengthen internal cybersecurity audits to align with federal transit safety regulations and industry best practices.
- Implement continuous risk monitoring and real-time security analytics to detect and mitigate cyber threats.
- Require cybersecurity incident documentation and remediation tracking as part of overall safety reporting.

Employee Training and Re-certification - 673.29(a)

All safety-sensitive bus transportation and maintenance staff are initially instructed on the operational and safety rules and procedures. They are provided with Standard Operating Procedures and Rulebooks as appropriate for their function.

Employee Training

New employees are required to attend a safety orientation and training module before beginning work. The purpose of the training is to review the contents of the job duties and to ensure a clear understanding of the safety and compliance requirements before performing work. Employees may be subject to periodic refresher training as needed. The New Employee Safety Orientation procedure contains the following checklist items:

1. The supervisor or management designee will be responsible for all new employee safety orientation and training.
2. Upon completing orientation training, the employee's manager shall sign and date the New Employee Safety Orientation Training Checklist verifying training.
3. Training includes safety, responsibility, compliance, communication, site orientation, and training.
4. The trainee and trainer must sign off on the New Employee Safety Orientation Training Checklist before the new employee is permitted to work unsupervised.

A copy of the completed New Employee Safety Orientation Training Checklist will be sent to the Safety Department. AC Transit provides de-escalation training to employees. The current strategy is to support our labor partners under the Collective Bargaining Agreement. The classes can be

included in the CDL class and new bus operator. Classes are offered twice a week by the training department. The primary attendees are ATU members. The Assault Awareness and De-escalation training includes the following:

Module 1: Defining assault and recognizing operator vulnerability.

Module 2: Using skills and strategies to prevent assaults.

Module 3: Reporting incidents and seeking assistance.

Re-Certification

Bus Operators receive annual training from qualified Training Instructors. The training process includes performance testing as well as supplemental training based on accidents or reported behaviors.

Transportation Supervisors and Controllers are also required to re-qualify annually. The process includes reviewing safety-critical rules and procedures, particularly those that are frequently violated; reviewing new procedures or rules; and conducting written knowledge and performance testing. Re-qualification may be required any time an Operator, Supervisor, or Controller's performance record indicates a deficiency.

Training class logistics and critical safety topics are entered into the Training Database Application. The physical training record/document is sent to the employee's home division for record retention. All incidents or accidents are identified before class enrollment, enabling corrective actions to be addressed/remedied during training.

Cybersecurity Training

The district has developed security-specific training to enhance the skills of the current staff and set standards for future members. Training can be obtained from classroom learning, online courses, or self-instruction using a reference library. This ongoing training will better equip the staff with the skills necessary to meet corporate information security goals. Monthly newsletters provide information on new cybersecurity initiatives, threats, and best practices.

Safety System Inspections

As part of the Safety Management System AC Transit performs audits and inspections to ensure compliance with established safety programs through various departments. The following list provides examples of activities to monitor safety assurance.

Proposed Scheduled Activities

Safety System Task	Frequency
Oversee and assure SMS compliance.	Ongoing
Random inspections of Departments for safety compliance (pre-trip inspections, driver files, maintenance records, etc.)	Semi-annual
PTASP review, maintenance, and distribution	Annual
Facilities Inspection	Quarterly
Employee safety training and testing and record keeping	Initial Hire/ Quarterly
Drug-free workplace (policy maintenance, employee training and testing, etc.)	Initial Hire/ Annual
Driver license validity check and record maintenance	Initial Hire/ As needed
Administrative/Human Resource safety actions	As Needed
Safety and security data acquisition and analysis	As Needed
Medical examination of drivers and record-keeping	Initial Hire/ Quarterly
Vehicle and equipment procurement	As Needed
Pre-trip inspections and record-keeping	Annual
Vehicle maintenance and record keeping	Annual
Safety inspections and record keeping	Annual
Event investigation and record keeping	As Needed
Investigate safety complaints	As Needed
Pre-employment screening	Initial Hire
Employee time recording and maintenance	As Needed
Internal safety audits	Annual
Facilitate external safety audits.	As required
Records maintenance, retention, and distribution	Ongoing
Self-certification of safety compliance	Annual
Intra-agency coordination and safety meetings	Quarterly

Safety Integration and Coordination

Safety Committees

The SMS Advisory Committee members are expected to be safety ambassadors and promote the PTASP through other committees; act as a subject matter expert; and/or facilitate the identification of hazards; identify the proper resolution of safety issues; or distribute safety information. The Committees may include:

- Operations Safety Taskforce
- Bus Transportation and Maintenance Safety Committees
- Joint Labor-Management Safety Committee (NEW)
- Division Safety Committees
- Union Safety Committee
- Accident Review Committee
- Accident Reduction Committee
- Bus Stop Safety Committee
- TAM Advisory Committee

Safety Department

The Safety Department coordinates the collection, maintenance, analysis, and reporting of safety data, achievements, and concerns. This activity aims to understand trends, determine leading and lagging indicators, and monitor performance towards the established safety goal and objectives. Using a safety management system or other tools, this activity may be accomplished through the following:

- Define information requirements and sources.
- Collect pertinent data from AC Transit departments.
- Monitor safety conditions and performance.
- Analyze safety-related data-system failures, accident statistics, accident trends, etc.
- Report safety performance, achievements, and concerns to the Accountable Executive, Executive Directors, Directors, and other District managers.

General Counsel

The General Counsel's office is responsible for providing legal counsel, advice, and litigation services to the District's Board of Directors and the internal departments of the district. The General Counsel oversees Risk Management and Claims Administration, Worker's Compensation, and the Video Review Unit.

Operations Department

The Operations Department supports the district by providing safe, clean, and reliable public transportation service to the East Bay and other communities in our service area. Functions within Operations include Transportation, Maintenance, Training and Education, Operations Control

Center, Service Supervision, Technical Services and Protective Services departments. The Operations Team provides leadership direction to nearly 2,000 front line employees and oversee operations and maintenance of over 630 buses, more than 150 non-revenue vehicles and 7 facilities located across the East Bay.

Team building, mentoring and motivating staff drives our success, which is our focus. Asset and performance management in a safe and efficient manner is our priority. Our passion is to create an environment that inspires and harbors creative and innovative solutions with a continuous improvement commitment. Our motto is "Relentless Leadership in Pursuit of Excellence."

Operations Control Center

The Operations Control Center Department is responsible for managing the safe operation of buses, responding to emergencies, and resolving issues that may arise during daily operations. OCC responsibilities include:

- Prepare and implement safe operating policies, plans, rules, and procedures and submit them to the Director of Compliance and SMS Advisory Committee for approval.
- Revise safe operating policies, plans, rules, and procedures to reflect current operating conditions.
- Monitor adherence to safety-related policies, plans, rules, and procedures. Identify personnel whose safety record requires follow-up, additional training, or discipline, including discharge.
- Report safety violations to the Safety Department
- Correct any condition that has caused, or has the potential to cause, injury to persons or damage to property/equipment.

Human Resources

The Human Resources Department ensures compliance with FTA drug and alcohol regulations during the hiring process.

Innovation and Technology Department

The Innovation and Technology Department coordinates with other departments, including the SMS Advisory Committee, to emphasize acceptable levels of data security. This includes evaluating processes and providing roadmaps to remedy risks in the Cybersecurity and Data Governance Programs to ensure the data is accurate, consistent, secure and aligns with overall organizational objectives. These safety activities include:

- Cybersecurity Governance
- Security Awareness – Email Social Engineering
- Logical Security
- Physical Security Controls
- Threat and Vulnerability Management
- Third Party Risk Management

- Employee Management – Security Awareness Training
- Data Protection
- Logging and Monitoring – Security Information and Event Management
- Security Configuration Management

Planning & Engineering Department

The Planning and Engineering Department coordinates with other departments, including the SMS Advisory Committee, to emphasize acceptable levels of safety in the engineering design of new equipment, facilities, and construction specifications on Capital Projects. It provides procedures that ensure vehicles and equipment with defects or deficiencies are not placed into operation. Additionally, the Department is responsible for supervising contractor activities to ensure adherence to safety rules, procedures, and regulations.

External Affairs, Marketing, and Communications

The External Affairs, Marketing, and Communications Department (Community Relations) provides information regarding AC Transit programs, operations, and events. Regarding safety, the department may develop and conduct outreach programs, such as safety awareness programs. These are provided to local schools, communities, citizen groups, media, and patrons. These programs and awareness packages highlight the risks to safety and the need for safe behavior on or around AC Transit equipment and facilities.

Internal Audit Department

The Internal Audit Department performs operational and compliance audits within AC Transit based on a risk assessment process. However, the Department may also perform Drug and Alcohol Program audits of the district's contractors and other audits as requested by the General Manager, Chief Operating Officer, Chief Safety Officer, or other Departments.

Contracts and Procurement

The Contracts and Procurement Department, as part of the hazard management process, works with the SSES when issuing contracts to ensure that contractors are compliant with state and federal regulations and with AC Transit requirements. Contractors who may conduct safety-sensitive work are identified, and the information is shared with the Drug and Alcohol Program Coordinator for further review.

Safety Responsibilities of Other Departments

Managers and Supervisors in all departments and divisions are responsible for safety, accident prevention, identification of hazards, and resolution of such hazards. Reports of all accidents/incidents, deficiencies, and defects will be maintained in the incident application, which is available to the Division Safety or Union Safety Committees for review.

System Start-Up and Testing (New Construction – FTA)

The District's Operations Safety Committee performs activities dealing with new mandates, regulations, and/or safety concerns during the design, construction, testing, and operational start-up phase in the Capital Investment Program. The process provides a structured framework within which testing must be accomplished, including general policy guidelines on personnel use. The Integrated test program consists of the following activities:

- Review procurement specifications for inclusion of safety requirements.
- Participation in Safety Design Reviews
- Job Hazard Analysis
- Audit acceptance test procedures for inclusion and satisfactory completion of tests, which assess compliance with safety requirements.
- Develop and approve project-specific certifiable items and manage the safety and security certification program.
- Assist in the inspection of new facilities to ensure they meet safety requirements.

Training and Qualifications

When new equipment is installed, the personnel responsible must complete an orientation to familiarize themselves with the new installations. This orientation, conducted by the Contractor, includes instruction, on-the-job training, and testing. The Safety Department and Human Resources Department shall maintain personnel training and certification records. The Safety Department should be included in all new equipment procurements and installations to ensure Cal OSHA mandates are met and/or in compliance.

Permits and Licenses

The Safety Department shall be included when permits needed for construction and operation of the system are identified, and the process for obtaining permits will be outlined in the final design. Tests, inspections, certifications, and all required permits and licenses issued by local, State, and Federal agencies must be included in the closeout documentation provided by the Contractor. Construction permits and code inspections, including Certificate of Occupancy, are obtained by the Contractor and shared with the Safety Department for review.

Safety Certification, System Start-up and Turnover

In the event of new revenue construction, the Contractor shall coordinate with the Safety Department to apply controls to assure the safety, completeness, and operability of equipment and systems transferred from construction to operations, including provisions for turnover of portions of systems, equipment check-out, start-up, testing, warranties, and personnel training. Safety and Security Certification of Certifiable Elements in the System shall be performed in accordance with the latest funded mandates and/or design standards.

Calibration, Functional Check-out, and Alignment

The contractor shall coordinate with the Safety Department and will conduct and complete calibration, functional checks, and alignment of operating systems such as signal prioritization, real-time passenger information signage, and fare vending machines before formal acceptance.

SAFETY PROMOTION - 673.29

At every district level, employees from the Executive Office to individual District personnel are responsible for assuring that AC Transit service provides the highest standards or level of safety in accordance with the PTASP.

Safety Program Coordination

The General Manager has delegated the authority for the development, implementation, and management of the PTASP to the Chief Safety Officer (CSO), who is responsible for the coordination of the district's safety and security programs and initiating efforts to improve the overall safety of transit customers, the public, and employees. Specific responsibilities include:

- Develop and update the PTASP.
- Coordinate, provide technical assistance and be the SME working through the executive team, safety committees and management to implement the PTASP.
- Support District safety-related programs, activities, and initiatives.
- Safety monitors and evaluates (risk assurance) implementation through auditing and review.
- Safety provides leadership and direction to the safety committees to train the organization to be safety specialists through safety committees and the Joint Labor Management Safety Committee.
- Monitor and evaluate safety related programs and activities at each District organizational level.
- Leading others through supporting training and testing of transportation personnel, both Bus Operators and Supervisors and Controllers and Dispatchers in the proper performance of safety-related operating policies, plans, rules, and procedures. Personnel are systematically trained, tested, and certified in the proper performance

Safety Communication Channels - 673.29(b)

AC Transit has established communication channels to inform and educate employees, contractors, and passengers. Initial and ongoing training of District employees on the PTASP will become part of the safety culture and facilitate a continuous improvement process. Safety performance information is distributed through various internal publications and employee gatherings. Provided are examples that include but are not limited to the various information sources.

- ✓ Safety Bulletins
- ✓ Tailgate Meetings
- ✓ District Intranet
- ✓ Town Hall Meetings
- ✓ Digital Board
- ✓ Flyers/ Posters/ Read Boards

Strengthening Cybersecurity Leadership & Expertise 673.29(c)

Recognizing the growing cybersecurity challenges in public transit, AC Transit will strengthen its security posture by recruiting a Senior Network Security Engineer to lead cybersecurity strategy, risk management, and compliance initiatives.

Implementation

- Hire a Senior Network Security Engineer to oversee cybersecurity risk management and strategy.
- Provide technical expertise and security governance for transit cybersecurity frameworks.
- Enhance threat intelligence gathering and proactive risk mitigation.
- Improve cybersecurity incident response capabilities through automation and real-time analytics.

Cybersecurity Training & Workforce Development 673.29(d)

A well-trained workforce is crucial for preventing cyber incidents and ensuring cybersecurity awareness among AC Transit employees. Cybersecurity training will be incorporated into Safety Promotion and workforce development programs.

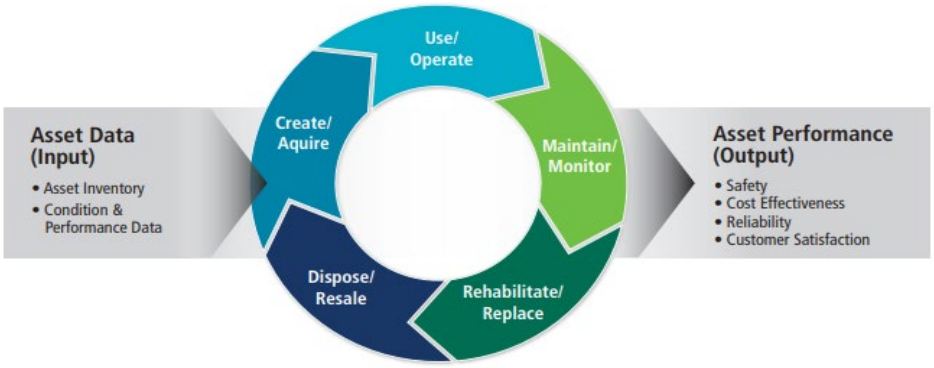
Implementation:

- Expand cybersecurity training to include AI-driven threats, phishing attacks, and ransomware awareness.
- Integrate cybersecurity awareness training into PTASP's Employee Training Program.
- Conduct monthly cybersecurity awareness campaigns, including interactive threat simulations.
- Implement role-based cybersecurity training for employees in high-risk positions.
- Conduct biannual phishing simulation assessments to evaluate and enhance employee cyber resilience.

Transit Asset Management Plan

AC Transit's Transit Asset Management (TAM) Plan is a strategic approach in managing fleet and facilities; to optimize their performance; their useful life; and to minimize the total cost of ownership. AC Transit has developed a framework for asset management and implementing procedures in the form of a Fleet and Facilities Maintenance Plan. These Maintenance Plans will be used to monitor and manage assets to achieve and maintain a state of good repair, improve safety, and increase reliability and performance as shown in the figure below. The purpose of these Maintenance Plans is to not only ensure that our assets are maintained in a state of good repair, but also to help to enhance our operations by providing safe, frequent, and reliable service.

Provided is the TAM Plan evaluation and asset lifecycle path demonstrating its support to continuous improvement.



Asset Lifecycle

Fleet/Facilities Maintenance Plan

AC Transit has developed the Fleet Maintenance Plan to monitor and manage assets to achieve and maintain a state of good repair, improve safety, and increase reliability and performance. The purpose of the Fleet Maintenance Plan is to provide an overview of the Department's budget, structure, asset management, and maintenance programs. For all operating revenue and non-revenue fleet assets, the Fleet Maintenance Plan addresses the following activities.

Fixed Asset Activities	
Asset Inventory	Training
Condition Assessment and Performance Measures	Vehicle Acceptance
Condition Reporting	Decommissioning
Organization Structure	Fiscal Budget
Preventative Maintenance, Inspections and Cleanliness Activities	Enterprise Asset Management and Work Control
Replacement Schedule	Warranty Program
Maintenance Program Structure	Capital Improvement Program

Maintenance Program

Maintenance and inspections of the district's operating systems must be effective to assure that all revenue and non-revenue vehicles and equipment operate as required, or in the event of failure or degradation of functionality, that operational safety is not compromised. This aspect of inspection and maintenance directly pertains to the safety of AC Transit customers, employees, emergency response agencies, the public, and subcontractors of the district.

AC Transit's maintenance program is based on the original equipment manufacturers maintenance intervals as well as industry best practices. The program is designed to maximize the

effective and efficient useful life of the district's bus fleet and facilities. The preventative maintenance inspections and scheduled standard tasks are the foundation of the district's maintenance programs.

The purpose of the program is to maximize the useful life of its fleet, buildings, infrastructure, and equipment through regular inspections, cleaning, maintenance, and repairs. Equipment and machinery are periodically scheduled for service based on the original equipment manufacturers' recommendations and/or industry best practices. The frequency and level of preventative maintenance service may vary based on equipment usage and coordination with other scheduled maintenance.

Driver Vehicle Inspection Reports

The Driver Vehicle Inspection Reports (DVIR) is a daily inspection referred to as a "Coach Pre-Trip Inspection and Defect Report" that requires operators to perform inspections defined by the California Code Regulations Title 13 and the Districts Operator User Guide. Several critical safety items are checked, including a brake and air loss test and the proper operation of other safety-related items such as the horn, wipers, tires, and lights.

A DVIR form is provided to the operator prior to his/her shift, to be completed and returned as instructed by Transportation Department management. All DVIRs are communicated to the Maintenance Department and addressed. A combination of an in-house-designed supervisor repair control log and Ellipse EAMS work orders is used to maintain the repair structure and on-time servicing.

> A hold card is used to identify an unsafe or unauthorized vehicle that was removed from service. This may be used in conjunction with or in lieu of a red tag. Hold cards may also be used to schedule maintenance for safety or reliability purposes.

Security Functions

For traditional security functions and terrorism prevention, AC Transit's plans are based upon a formally adopted policy of awareness, alert observation, and reporting by all employees, especially front-line personnel, combined with effective responses by District Operations and first-responder law enforcement and emergency management organizations. AC Transit riders are also asked to report suspicious behaviors or packages to employees or call 9-1-1 in case of an incident. The District's Security Department works in partnership with Police and Sheriff departments throughout AC Transit's service area for high responsiveness to calls for police on the transit system, for application of the District Code throughout the AC Transit service area, and effective criminal investigations and prosecutions.

In support of security awareness and reporting by transit system employees, AC Transit design criteria for new service projects apply crime prevention through environmental design (CPTED) and provide Closed Circuit Television (CCTV) and other equipment to enhance security.

Hours of Service

AC Transit has established and implemented an "Hours of Service" for the District's Bus Operators defined in the Collective Bargaining Agreement. The rules intend to ensure that operations and maintenance of AC Transit revenue vehicles are not placed at risk from the possibility of fatigue by employees. The regulations apply to safety-sensitive positions directly involved with revenue vehicle operation, maintenance, supervision, control, and dispatching.

Rider Guides

AC Transit provides rider guides for its customers as a general tool to use the district's bus service to provide for the public's safety. Detailed information can be found on the AC Transit website to advise customers on safety precautions that include:

- ✓ Catching and boarding the bus
- ✓ Stopping and exiting the bus
- ✓ Accessibility
- ✓ Boarding bikes, strollers, and animals
- ✓ Proper riding etiquette

Procurement Safety Standards

Procurement of new systems such as facilities, equipment, and rolling stock includes safety requirements in specifications, design reviews, testing, and configuration control. These procurements include consultation with the SMS Advisory Committee to ensure basic system safety principles. The Safety Advisory Committee may act as a Transit Review Change Committee or management of change committee to provide the following:

Consideration is given to the following safety requirements:

- Compatible with the existing AC Transit system safety features, design, and procedures.
- Incorporate "fail-safe" principles when failures would cause a catastrophe resulting in injury to personnel, damage to equipment, or inadvertent operation of critical systems.
- Avoid, eliminate, or reduce identified safety hazards by design change, safety devices, and parts or materials selection. The composition of hydraulic fluids, lubricants, and other materials shall provide optimum safety characteristics and fire-resistant properties.
- Location of equipment components so that access by personnel during operation, maintenance, repair, or adjustment activities shall not require exposure to hazards such as electrical shocks, burns, cutting edges, sharp points, or dangerous or toxic materials.

- Design to minimize severe damage to equipment or injury to personnel in the event of an accident.
- Avoid undue exposure to physiological and psychological stresses, which might cause errors leading to an accident.
- Provide suitable warning and cautionary notes in instructions for operation, assembly, maintenance, and repair and distinctive markings for personnel protection on hazardous components, equipment, and facilities.

Contractors who provide systems, sub-systems, or equipment that affect safe transit operations or passenger/employee safety are required to establish and maintain a system safety program in accordance with an approved system safety program plan. The contractor's approved system safety program plan must define objectives, tasks, procedures, schedules, and data submittals for the safety activities that will be performed by the contractor. The Capital Projects and Facilities Departments approve the contractor's system safety program plans, with the concurrence of the Chief Safety Officer or designee.

Additionally, all personal protective equipment to be used by District personnel is reviewed and approved by the Safety Department in accordance with respiratory, hearing conservation, or other applicable safety standards. Chemicals and other potentially hazardous materials being considered for purchase and use are also reviewed and approved by the Safety Department and environmental compliance.

Cybersecurity Vendor & Procurement Standards

To protect transit infrastructure from supply chain risks, cybersecurity controls will be integrated into vendor and procurement policies to ensure compliance with AC Transit's Procurement Safety Standards.

Implementation

- Require cybersecurity risk assessments for third-party vendors and service providers.
- Mandate zero-trust security architecture for vendor system access and integrations.
- Implement continuous security monitoring for third-party service providers handling transit-sensitive data.
- Enforce annual cybersecurity compliance attestations for vendors supporting transit operations.

Contractor Safety Coordination

AC Transit has established a safety management practice protecting the safety and security of employees, contractors, and the public during project work activities. Construction safety is administered in accordance with the District's Capital Investment Program, contract specifications, and applicable federal, such as the Occupational Safety and Health Administration (OSHA), state, and local safety requirements.

Project teams are committed to providing a safe and secure travel and work environment. Moreover, safety, accident prevention, and security breach prevention must be incorporated into the performance of each task. Each Project team member is responsible for accident /security breach prevention reporting and maintaining safety and security standards consistent with their position and organization function.

Through a cooperative team effort and systematic application of safety and security principles, projects will be designed and constructed to operate safely, securely, dependably, and efficiently. Industry best practices.

AC Transit has established a safety management practice protecting the safety and security of employees, contractors, and the public during project work activities. Construction safety is administered in accordance with the District's Capital Investment Program, contract specifications, and applicable federal, such as the Occupational Safety and Health Administration (OSHA), state, and local safety requirements.

Project teams are committed to providing a safe and secure travel and work environment. Moreover, safety, accident prevention, and security breach prevention must be incorporated into the performance of each task. Each Project team member is responsible for accident /security breach prevention reporting and maintaining safety and security standards consistent with their position and organization function.

Through a cooperative team effort and systematic application of safety and security principles, projects will be designed and constructed to operate safely, securely, dependably, and efficiently. Industry best practices.

Regulatory Compliance

AC Transit is committed to complying with all applicable local, state, and federal regulatory requirements, including using and disposing of hazardous materials.

Occupational Safety and Health Program

The district is committed to the safety and health of its employees and contractors within its bus service. Accordingly, AC Transit has developed an Occupational Safety and Health Program and Construction Safety Program. The programs emphasize recognizing, evaluating, and controlling hazards arising from the occupational and construction project environments.

The Occupational Safety and Health Program aims to achieve a safe working environment for employees and minimize the likelihood of occupational-related injuries and illnesses. The program is based on and complies with applicable federal, state, and local safety codes and regulations. Procedures have been established to control operating hazards including, but not limited to, chemicals, noise, cut and abrasion injuries, and strain and sprain injuries.

District employees' on-the-job training is focused on hazard recognition and promoting occupational safety and health practices. Attention is given to the need for and proper use of personal protective equipment and clothing as required by the work being performed. Routine

comprehensive industrial hygiene surveys and industrial safety inspections are conducted to ensure that health and safety hazards in the workplace are identified and controlled.

Alcohol and Substance Abuse Compliance

The Alcohol and Substance Abuse Compliance Unit (ASACU) is responsible for promoting an alcohol and drug-free workplace and environment for the health and safety of its employees and patrons, ensuring that the AC Transit District's Alcohol and Substance Abuse Program complies with the Federal Transit Administration (FTA) and Department of Transportation (DOT) regulations and collective bargaining agreements. The ASACU helps accomplish our mission by focusing on the following goals:

- Working proactively to help prevent accidents, injuries, and fatalities resulting from the misuse of alcohol and use of prohibited drugs.
- The health and well-being of AC Transit employees
- Promoting a healthy and safe environment for employees and the public
- Compliance with FTA, DOT, Board policies, regulations, and contract language to mitigate risks, liability, and impact.
- Promoting understanding, awareness, and well-functioning business partnerships with the administration and compliance with drug and alcohol testing

Drug and Alcohol Policy

The district's policy is to provide a drug—and alcohol-free workplace and environment for all employees and patrons. A drug—and alcohol-free workplace protects this agency's most valuable resources—its employees and the health and safety of the public.

Administered Safety Tests

The following tests will be administered under FTA guidelines for all safety-sensitive employees, and under this Policy, for all non-safety-sensitive employees:

	Safety Sensitive	Non-Safety Sensitive
1 Pre-employment	X	-
2. Transfer to safety-sensitive	-	X
3. Reasonable suspicion	X	X
4. Return to Duty	X	X
5. Post-accident	X	-
6. Follow-up	X	X
7. Random	X	-
8. DOT Biennial	X	-

Hazardous Materials Program

AC Transit has established a comprehensive program to control hazardous materials used, including waste materials disposal. The District's Materials Department details the process for purchasing, receiving, and using hazardous materials within the AC Transit system. The Safety and Environmental Engineering Departments are responsible for reviewing all Safety Data Sheets (SDS) for chemicals and other potentially hazardous materials that are being considered for purchase and forward approval for field use, including required protective measures. All employees who may use hazardous materials receive training from their supervisors on the safe use and disposal of the products. Follow-up is conducted on the field use of approved products to ensure safe/proper handling methods are utilized.

The Clean Air Act Amendments (CAAA) of 1990, the Clean Water Act, the Resource Conservation and Recovery Act (RCRA), and the Environmental Protection Agency (EPA) regulations are major laws and regulations that impact the Facility Maintenance Department. The following activities apply to the program's regulatory compliance.

Hazardous Waste Management

Hazardous waste management is performed through the implementation of proper procedures and internal inspections to ensure that all District facilities minimize and control the generation of hazardous waste and ensure disposal is in accordance with federal and state of California environmental regulations and local requirements.

Aboveground/Underground Storage Tank (AST/UST) Operations

To meet AST and UST operational and certification requirements, inspections and testing are conducted to verify all electronic monitoring equipment and tank components are functioning properly and ensure that all record-keeping and training procedures are implemented and maintained properly.

Storm Water Discharge Monitoring and Reporting

In accordance with California's Industrial General Permit for Storm Water Discharges, AC Transit regularly examines potential sources of pollutants in stormwater discharges during monthly yard walks and inspections. We continue to address challenges with operating under benchmark levels through better training and education.

Wastewater Discharge Monitoring and Reporting

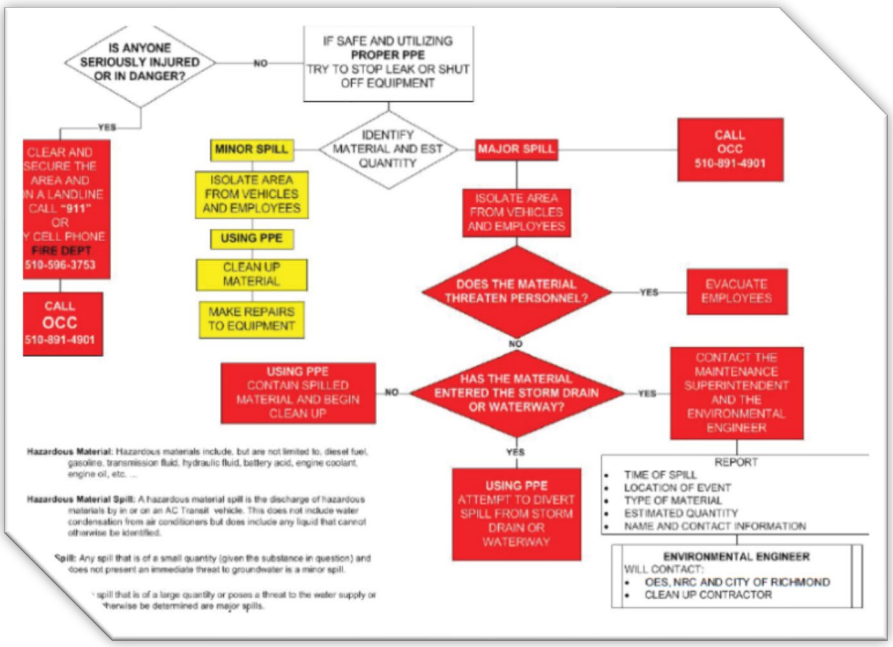
The wastewater regulatory compliance activities are tracked and reported regularly as part of our suite of environmental compliance requirements. Wastewater samples from all facilities are collected and analyzed throughout the year in accordance with permit requirements.

Air Emissions Permitting Activities

AC Transit maintains several air quality permits through the Bay Area Air Quality Management District (BAAQMD). The permits include those for five dispensing facilities and other emissions sources such as diesel-operated fire pumps, backup generators, and paint booths.

Hazardous Materials Plans

AC Transit maintains Hazardous Materials Business Plans and Spill Prevention, Control, and Countermeasure (SPCC) Plans, primarily for fuels and oils, and manages hazardous waste generated in accordance with federal, state, and local guidelines. The bulk of the waste generated is waste oils and coolant, oily rags, and other maintenance-related items that typically get recycled. AC Transit conducts proper storage, labeling, and handling of these materials, conducts frequent inspections, and maintains employee training and records in accordance with regulatory requirements.



Example of Response Procedure

Appendix 1: FTA 49 CFR Part 673 Requirements Matrix

Part 673	Citation	PTASP Section
Subpart A- General	§ 673.3 Policy	Safety Management Policy
	§ 673.5 Definitions	Acronyms and Definitions
Subpart B- Safety Plans	§ 673.11 General requirements	Plan Development, Approval, and Updates
	§ 673.13 Certification of compliance	
	§ 673.15 Coordination with metropolitan, statewide, and non-metropolitan planning processes.	
Subpart C- Safety Management Systems	§ 673.21 General requirements	Safety Management Policy
		Safety Risk Management
		Safety Assurance
		Safety Promotion
	§ 673.23 Safety Management Policy	Safety Management Policy
	§ 673.25 Safety Risk Management	Safety Risk Management
	§ 673.27 Safety Assurance	Safety Assurance
	§ 673.29 Safety Promotion.	Safety Promotion
Subpart D—Safety Plan Documentation and Recordkeeping	§ 673.31 Safety plan documentation	Transit Agency Information

Appendix 2: Acronyms and Definitions

Accident means an Event that involves any of the following: A loss of life; a report of a serious injury to a person; a collision of public transportation vehicles; a runaway train; an evacuation for life safety reasons; or any derailment of a rail transit vehicle, at any location, at any time, whatever the cause.

Accountable Executive means a single, identifiable person who has ultimate responsibility for carrying out the Public Transportation Agency Safety Plan of a public transportation agency; responsibility for carrying out the agency's Transit Asset Management Plan; and control or direction over the human and capital resources needed to develop and maintain both the agency's Public Transportation Agency Safety Plan, in accordance with 49 U.S.C. 5329(d), and the agency's Transit Asset Management Plan in accordance with 49 U.S.C. 5326.

Chief Safety Officer means an adequately trained individual who has responsibility for safety and reports directly to a transit agency's chief executive officer, general manager, president, or equivalent officer. A Chief Safety Officer may not serve in other operational or maintenance capacities unless the Chief Safety Officer is employed by a transit agency that is a small public transportation provider as defined in this part or a public transportation provider that does not operate a rail fixed guideway public transportation system.

CISA – Cybersecurity and Infrastructure Security Agency

Cybersecurity Risk Assessment – A systematic process of identifying, analyzing, and mitigating risks that could impact digital transit infrastructure.

Equivalent Authority means an entity that carries out duties similar to that of a Board of Directors, for a recipient or subrecipient of FTA funds under 49 U.S.C. Chapter 53, including sufficient authority to review and approve a recipient or subrecipient's Public Transportation Agency Safety Plan.

Event means any Accident, Incident, or Occurrence.

FTA means the Federal Transit Administration, an operating administration within the United States Department of Transportation.

Hazard means any real or potential condition that can cause injury, illness, or death; damage to or loss of the facilities, equipment, rolling stock, or infrastructure of a public transportation system; or damage to the environment.

Incident means an event that involves any of the following: A personal injury that is not a serious injury; one or more injuries requiring medical transport; or damage to facilities, equipment, rolling stock, or infrastructure that disrupts the operations of a transit agency.

Investigation means the process of determining the causal and contributing factors of an accident, incident, or hazard, for the purpose of preventing recurrence and mitigating risk.

NIST – National Institute of Standards and Technology

Occurrence means an Event without any personal injury in which any damage to facilities, equipment, rolling stock, or infrastructure does not disrupt the operations of a transit agency.

Operator of a public transportation system means a provider of public transportation as defined under 49 U.S.C. 5302(14).

Penetration Testing – A simulated cyberattack designed to identify vulnerabilities in AC Transit's systems before malicious actors exploit them.

Performance measure means an expression based on a quantifiable indicator of performance or condition that is used to establish targets and to assess progress toward meeting the established targets.

Performance target means a quantifiable level of performance or condition, expressed as a value for the measure, to be achieved within a time period required by the Federal Transit Administration (FTA).

Public Transportation Agency Safety Plan means the documented comprehensive agency safety plan for a transit agency that is required by 49 U.S.C. 5329(d) and 49 CFR Part 673.

Risk means the composite of predicted severity and likelihood of the potential effect of a hazard.

Risk mitigation means a method or methods to eliminate or reduce the effects of hazards.

Safety Assurance means processes within a transit agency's Safety Management System that functions to ensure the implementation and effectiveness of safety risk mitigation, and to ensure that the transit agency meets or exceeds its safety objectives through the collection, analysis, and assessment of information.

Safety Management Policy is a transit agency's documented commitment to safety. It defines the agency's safety objectives and the accountabilities and responsibilities of its employees regarding safety.

Safety Management System (SMS) is the formal, top-down, organization-wide approach to managing safety risk and assuring the effectiveness of a transit agency's safety risk mitigation. SMS includes systematic procedures, practices, and policies for managing risks and hazards.

Safety Management System (SMS) Executive means a Chief Safety Officer or an equivalent.

Safety performance target means a Performance Target related to safety management activities.

Safety Promotion means a combination of training and communication of safety information to support SMS as applied to the transit agency's public transportation system.

Safety risk assessment means the formal activity whereby a transit agency determines Safety Risk Management priorities by establishing the significance or value of its safety risks.

Safety Risk Management means a process within a transit agency's Public Transportation Agency Safety Plan for identifying hazards and analyzing, assessing, and mitigating safety risk.

Serious injury means any injury which:

1) Requires hospitalization for more than 48 hours, commencing within 7 days from the date of the injury was received.
2) Results in a fracture of any bone (except simple fractures of fingers, toes, or noses).
3) Causes severe hemorrhages, nerve, muscle, or tendon damage.
4) Involves any internal organ; or
5) Involves second- or third-degree burns, or any burns affecting more than 5 percent of the body surface.

Security Information and Event Management (SIEM) – A cybersecurity system that provides real-time analysis of security alerts generated by applications and network hardware.

Security Operations Center (SOC) – A centralized team responsible for monitoring, detecting, and responding to cybersecurity incidents in transit operations.

Small public transportation provider means a recipient or subrecipient of Federal financial assistance under 49 U.S.C. 5307 that has one hundred (100) or fewer vehicles in peak revenue service and does not operate a rail fixed guideway public transportation system.

State means a State of the United States, the District of Columbia, Puerto Rico, the Northern Mariana Islands, Guam, American Samoa, and the Virgin Islands.

State of good repair means the condition in which a capital asset is able to operate at a full level of performance.

State Safety Oversight Agency means an agency established by a State that meets the requirements and performs the functions specified by 49 U.S.C. 5329(e) and the regulations set forth in 49 CFR part 674.

Transit agency means an operator of a public transportation system.

Transit Asset Management (TAM) Plan means the development of a plan for strategic and systematic practice of procuring, operating, inspecting, maintaining, rehabilitating, and replacing transit capital assets to manage their performance, risks, and costs over their life cycles, for the purpose of providing safe, cost-effective, and reliable public transportation, as required by 49 U.S.C. 5326 and 49 CFR part 625.

Virtual Private Network (VPN) – A secure encrypted connection over the internet that helps protect sensitive transit data from cyber threats.

Zero-Trust Security Architecture – A cybersecurity framework requiring verification for every person and device attempting to access network resources, reducing potential unauthorized access.