



AGENDA FOR THE MASS TRANSIT DEPARTMENT BOARD MEETING

**January 06, 2026
COUNCIL CHAMBERS, CITY HALL, 300 N. CAMPBELL AND VIRTUALLY
11:30 AM**

Teleconference phone number: 1-915-213-4096

Toll free number: 1-833-664-9267

Conference ID: 606-142-948#

Members of the public may view the meeting via the following means:

Via the City's website. <http://www.elpasotexas.gov/videos>

Via television on City15,

YouTube: <https://www.youtube.com/user/cityofelpasotx/videos>

In compliance with the requirement that the City provide two-way communication for members of the public, members of the public may communicate with Council during public comment, and regarding agenda items by calling either of the numbers listed above and entering the corresponding conference ID.

The public is strongly encouraged to sign up to speak on items on this agenda before the start of this meeting on the following links:

<https://www.elpasotexas.gov/city-clerk/forms/>

<https://app.smartsheet.com/b/form/7086be5f4ed44a239290caa6185d0bdb>

A quorum of the Mass Transit Department Board must participate in the meeting.

ROLL CALL

CALL TO THE PUBLIC – PUBLIC COMMENT:

This time is reserved for members of the public who would like to address the Mass Transit Department Board on items that are not on the Mass Transit Department Board Agenda.

Members of the public may communicate with Board Members during public comment, and

regarding agenda items by calling 1-915-213-4096 or toll free number 1-833-664-9267 at the prompt please enter the following Conference ID: 606-142-948#

A sign-up form is available on line at:

<https://app.smartsheet.com/b/form/dfad29e838da41fd86052bb264abd397>

for those who wish to sign up in advance of the meeting date. Requests to speak must be received by 9:00 a.m. on the date of the meeting. Thirty minutes in total is allotted for speakers.

NOTICE TO THE PUBLIC:

All matters listed under the CONSENT AGENDA, including those on the Addition to the Agenda, will be considered by Mass Transit Department Board to be routine and will be enacted by one motion unless separate discussion is requested by Board Members. Prior to the vote, members of the audience may ask questions regarding items on the consent agenda. When the vote has been taken, if an item has not been called out for separate discussion, the item has been approved. The Mass Transit Department Board may, however, reconsider any item at any time during the meeting.

CONSENT AGENDA - APPROVAL OF MINUTES:

1. Approval of Minutes of the Mass Transit Department Board Meeting of December 2, 2025. [26-0023](#)

All Districts

Sun Metro Mass Transit, Anthony R. DeKeyzer, (915) 212-3306

CONSENT AGENDA – REQUEST TO EXCUSE ABSENT MASS TRANSIT DEPARTMENT BOARD MEMBERS

2. Request to excuse absent Mass Transit Board Members. [26-0034](#)

CONSENT AGENDA - RESOLUTIONS:

3. A Resolution approving and adopting the Sun Metro Agency Safety Plan. Further, that the City Manager, or designee be authorized to submit the Sun Metro Agency Safety Plan to the Federal Transit Administration, the Texas Department of Transportation, the State Safety Oversight Agency and any other entities required by law. Further, that the City Manager, or designee, be authorized to execute any documents and perform any actions necessary to effectuate the Sun Metro Agency Safety Plan. [26-0032](#)

All Districts

Sun Metro Mass Transit, Anthony R. DeKeyzer, (915) 212-3306

Sun Metro Mass Transit, Dwayne Arnold, (915) 212-3332

CONSENT AGENDA - NOTICE FOR NOTATION:

4. For Notation Only: Notice of Sun Metro's Title VI Program update. The program update was prepared in accordance with the requirements specified in the Federal Transit Administration (FTA) Circular 4702.1b, "Title VI requirements and Guidelines for Federal Transit Administration Recipients."

[26-0033](#)

All Districts

Sun Metro Mass Transit, Anthony R. DeKeyzer, (915) 212-3306

Sun Metro Mass Transit, Jerry DeMuro, (915) 212-3470

REGULAR AGENDA - OPERATIONAL FOCUS UPDATES

5. Operational update on the Mass Transit Department Sun Metro.

[26-0031](#)

All Districts

Sun Metro Mass Transit, Anthony R. DeKeyzer, (915) 212-3306

EXECUTIVE SESSION

The Mass Transit Department Board of the City of El Paso may retire into EXECUTIVE SESSION pursuant to Section 3.5A of the El Paso City Charter and the Texas Government Code, Chapter 551, Subchapter D, to discuss any of the following: (The items listed below are matters of the sort routinely discussed in Executive Session, but the Mass Transit Department Board of the City of El Paso may move to Executive Session any of the items on this agenda, consistent with the terms of the Open Meetings Act.) The Mass Transit Department Board will return to open session to take any final action and may also, at any time during the meeting, bring forward any of the following items for public discussion, as appropriate.

Section 551.071	CONSULTATION WITH ATTORNEY
Section 551.072	DELIBERATION REGARDING REAL PROPERTY
Section 551.073	DELIBERATION REGARDING PROSPECTIVE GIFTS
Section 551.074	PERSONNEL MATTERS
Section 551.076	DELIBERATION REGARDING SECURITY DEVICES OR SECURITY AUDITS
Section 551.087	DELIBERATION REGARDING ECONOMIC DEVELOPMENT NEGOTIATIONS
Section 551.089	DELIBERATION REGARDING SECURITY DEVICES OR SECURITY AUDITS; CLOSED MEETING

ADJOURN

NOTICE TO THE PUBLIC:

Sign Language interpreters are provided for meetings. If you need Spanish Interpretation Services, please email CityClerk@elpasotexas.gov by 12:00 p.m. on the Friday before the meeting.

Si usted necesita servicios de interpretación en español, favor de enviar un correo electrónico a CityClerk@elpasotexas.gov a mas tardar a las 12:00 p.m. del viernes previo a la fecha de la junta.

MASS TRANSIT BOARD AGENDAS ARE PLACED ON THE INTERNET THE THURSDAY PRIOR TO EACH MEETING AT THE FOLLOWING ADDRESS:

<http://www.elpasotexas.gov/>



Legislation Text

File #: 26-0023, **Version:** 1

**CITY OF EL PASO, TEXAS
LEGISTAR AGENDA ITEM SUMMARY FORM**

DISTRICT, DEPARTMENT, CONTACT INFORMATION:

*Please choose District and Department from drop down menu. Please post exactly as example below.
No Title's, No emails. Please use ARIAL 10 Font.*

All Districts

Sun Metro Mass Transit, Anthony R. DeKeyzer, (915) 212-3306

AGENDA LANGUAGE:

This is the language that will be posted to the agenda. Please use ARIAL 11 Font.

Approval of Minutes of the Mass Transit Department Board Meeting of December 2, 2025.



**MASS TRANSIT DEPARTMENT BOARD MINUTES
CITY COUNCIL CHAMBERS
DECEMBER 2, 2025**

A meeting of the Mass Transit Department Board was called to order at 11:30 a.m. Board Chair Renard Johnson was present and presiding and the following Board Members answered roll call: Alejandra Chávez, Josh Acevedo, Deanna Maldonado-Rocha, Cynthia Boyar Trejo, Art Fierro, Lily Limón, and Chris Canales. Late arrival: Ivan Niño at 11:32 a.m.

NOTICE TO THE PUBLIC:

Motion made by Board Member Limón, seconded by Board Member Fierro, and unanimously carried to **APPROVE** all matters listed under the Consent Agenda (Items approved, postponed, or deleted pursuant to the vote on the Consent Agenda will be shown with an asterisk {*}.)

CALL TO THE PUBLIC – PUBLIC COMMENT:

There was no public comment.

CONSENT AGENDA – APPROVAL OF MINUTES:

1. *Motion made, seconded, and unanimously carried to **APPROVE** the minutes of the Regular Mass Transit Department Board Meeting of November 4, 2025.
-

CONSENT AGENDA – REQUEST TO EXCUSE ABSENT MASS TRANSIT BOARD MEMBERS:

2. **NO ACTION** was taken on this item.
-

REGULAR AGENDA – OPERATIONAL FOCUS UPDATES:

3. Presentation and discussion of Sun Metro's planned system wide route restructure, Sun Metro Rising, scheduled for implementation in June 2026. The restructure aims to improve the frequency of buses throughout the system, enhance connectivity and improve the customer experience through reduce travel times, streamlining existing routes, introducing new ones, and discontinuing routes with low or no ridership. Included in the presentation will be the results of customer feedback collected during restructure planning efforts.

Mr. Anthony R. DeKeyzer, Director of Sun Metro, presented.

Mr. Ulises Hernandez Jimenez, Senior Associate with Nelson Nygaard Consulting Associates, commented.

The following City staff members commented:

- Ms. Dionne Mack, City Manager
- Claudia A. Garcia, Purchasing and Strategic Sourcing Director

Board Members Chávez, Acevedo, Maldonado-Rocha, Niño, Fierro, and Canales commented.

NO ACTION was taken on this item.

4. Motion made by Board Member Limón, seconded by Board Member Fierro **and unanimously carried** to **AUTHORIZE** the Director of Purchasing & Strategic Sourcing to issue Purchase Order(s) for Solicitation 2025-0133 TVMs & Validators to Flowbird America, Inc., the sole authorized distributor and provider for FlowBird Axio validators, Strada Ticket Vending Machines, and Flowbird software support and maintenance for a term of three (3) years for an estimated amount of \$2,219,995.49. Supplier will be required to provide an updated sole source letter and affidavit each year.

Contract Variance:

The difference based in comparison to the previous contract is as follows: An increase of \$848,995.49 for the term, which represents a 61.93% increase due additional ticket vending machines, validators as well as price increases for goods and services provided under this contract.

Department:	Mass Transit- Sun Metro
Award to:	Flowbird America, Inc.
City & State:	Moorestown, NJ
Item(s):	All
Initial Term:	3 Years
Option Term:	NA
Total Contract Time:	3 Years
Annual Estimated Award:	\$2,219,995.49
Initial Term Estimated Award:	\$2,219,995.49
Option Term Estimated Award:	NA
Total Estimated Award:	\$2,219,995.49
Account(s):	560-3215-580100-60050-P6018-P60FTA113-G60235339
Funding Source(s):	FTA Formula 5339

District(s): All

Non-Competitive Procurement under Local Government General Exemption:

Section 252.022 - (7) a procurement of items that are available from only one source - (D) captive replacement parts or components for equipment.

The Purchasing & Strategic Sourcing and Sun Metro departments recommend award as indicated to Flowbird America, Inc., under the exemption listed above.

It is requested that the City Manager be authorized to establish the funding sources and make any necessary budget transfers and execute any and all documents necessary for execution of this award.

AYES: Board Chair Johnson and Board Members Chávez, Acevedo, Maldonado-Rocha, Boyar Trejo, Niño, Fierro, Limón, and Canales.

NAYS: None

ADJOURN

Motion made by Board Member Limón, seconded by Board Member Fierro, and unanimously carried to **ADJOURN** the meeting at 12:19 p.m.

AYES: Board Chair Johnson and Board Members Chávez, Acevedo, Maldonado-Rocha, Boyar Trejo, Niño, Fierro, Limón, and Canales

NAYS: None

Approved as to content:

Anthony DeKeyzer, Director of Mass Transit



Legislation Text

File #: 26-0034, **Version:** 1

**CITY OF EL PASO, TEXAS
LEGISTAR AGENDA ITEM SUMMARY FORM**

AGENDA LANGUAGE:

This is the language that will be posted to the agenda. Please use ARIAL 11 Font.

Request to excuse absent Mass Transit Board Members.



Legislation Text

File #: 26-0032, **Version:** 1

**CITY OF EL PASO, TEXAS
LEGISTAR AGENDA ITEM SUMMARY FORM**

DISTRICT, DEPARTMENT, CONTACT INFORMATION:

Please choose District and Department from drop down menu. Please post exactly as example below.

No Title's, No emails. Please use ARIAL 10 Font.

All Districts

Sun Metro Mass Transit, Anthony R. DeKeyzer, (915) 212-3306

Sun Metro Mass Transit, Dwayne Arnold, (915) 212-3332

AGENDA LANGUAGE:

This is the language that will be posted to the agenda. Please use ARIAL 11 Font.

A Resolution approving and adopting the Sun Metro Agency Safety Plan. Further, that the City Manager, or designee be authorized to submit the Sun Metro Agency Safety Plan to the Federal Transit Administration, the Texas Department of Transportation, the State Safety Oversight Agency and any other entities required by law. Further, that the City Manager, or designee, be authorized to execute any documents and perform any actions necessary to effectuate the Sun Metro Agency Safety Plan.

**CITY OF EL PASO, TEXAS
AGENDA ITEM
DEPARTMENT HEAD'S SUMMARY FORM**



DEPARTMENT: Sun Metro Mass Transit

AGENDA DATE: 1/6/26

PUBLIC HEARING DATE:

CONTACT PERSON NAME: Anthony DeKeyzer

PHONE NUMBER: (915) 212-3306

2nd CONTACT PERSON NAME: Dwayne Arnold

PHONE NUMBER: (915) 212-3306

DISTRICT(S) AFFECTED: All

STRATEGIC GOAL:

7. Enhance & Sustain El Paso's Infrastructure Network

SUBGOAL:

7.3: Enhance a regional comprehensive transportation system

SUBJECT:

Consent and Notation that the Sun Metro Agency Safety Plan is approved and adopted. Further, that the City Manager, or designee, be authorized to submit the Agency Safety Plan to the Federal Transit Administration, the Texas Department of Transportation, and/or the State Safety Oversight Agency. Further, that the City Manager or designee, be authorized to execute any documents and perform any actions necessary to effectuate the Agency Safety Plan. Further, to the extent allowed by law that the City Manager is authorized to make any changes to the Agency Safety Plan.

The Sun Metro Agency Safety Plan includes the following outline:

Plan Approval Documentation; PTASP Revision History Table; Safety Management Policy Chapter (CFR 673.23); Control of Records & Documents requirements; Sun Metro Organizational Chart; Safety Risk Management (49 CFR 673.25); Safety Assurance (49 CFR 673.27); Safety Promotion Chapter (49 CFR 673.29); Emergency Preparedness and Response Plan; Road Workers Protection (RWP) (49 CFR 673.25 and 671)

BACKGROUND / DISCUSSION:

The Safety Plan is reviewed annually and more often as needed

COMMUNITY AND STAKEHOLDER OUTREACH:

N/A

PRIOR COUNCIL ACTION:

Revision 5 of the Sun Metro Agency Safety Plan was approved by Mass Transit Department Board on February 4, 2025.

AMOUNT AND SOURCE OF FUNDING:

N/A

REPORTING OF CONTRIBUTION OR DONATION TO CITY COUNCIL:

N/A

NAME	AMOUNT (\$)

*****REQUIRED AUTHORIZATION*****

DEPARTMENT HEAD:

Jerry DeMuro

Digitally signed by Jerry DeMuro
Date: 2025.12.05 09:53:39 -07'00'

(If Department Head Summary Form is initiated by Purchasing, client department should sign also)

RESOLUTION

WHEREAS, in compliance with federal law, specifically 49 U.S.C. §5329, the City of El Paso's Mass Transit Department ("Sun Metro") maintains a public transportation agency safety plan, called Sun Metro Agency Safety Plan ("plan"); and

WHEREAS, the City of El Paso updates the plan periodically in order to maintain compliance with the law and ensure the safety of the employees, the riders and the community at large; and

WHEREAS, the last update to the plan was approved by the City of El Paso's Mass Transit Department Board on February 4, 2025; and

WHEREAS, City of El Paso now wishes to update the plan to improve the services provided to the community and ensure the safety of its employees and the public it serves.

NOW THEREFORE, BE IT RESOLVED BY THE MASS TRANSIT DEPARTMENT BOARD OF THE CITY OF EL PASO:

That the Sun Metro Agency Safety Plan attached to this resolution as Attachment "A" is approved and adopted.

That the City Manager, or designee, be authorized to submit the Sun Metro Agency Safety Plan to the Federal Transit Administration, the Texas Department of Transportation, the State Safety Oversight Agency and any other entities required by law.

That the City Manager, or designee, be authorized to execute any documents and perform any actions necessary to effectuate the Sun Metro Agency Safety Plan.

APPROVED this ____ day of _____, 2026.

MASS TRANSIT DEPARTMENT BOARD:

Renard U. Johnson
Chair

ATTEST:

Laura D. Prine, Secretary

APPROVED AS TO FORM:

Joyce Garcia

Joyce Garcia
Assistant City Attorney

APPROVED AS TO CONTENT:

Jerry DeMuro Deputy Transit Officer for
Anthony R. Dekeyzer, Director
Sun Metro/Mass Transit Department

(Attachment "A" on the following pages)

Sun Metro Agency Safety Plan

Revision 6
November 10, 2025

Sun Metro | City of El Paso
10151 Montana Ave.
El Paso, TX 79925

Approved on: _____



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Plan Approval Documentation

Prepared By	Signature	Date
Johnny Balcazar, WSO-CSSD, TSSP, PTSCTP, Bus/Rail Streetcar Safety Manager/SMS Executive		
Reviewed By	Signature	Date
Esteban Perea, TSSP-Bus, WSO-CSM Transit Safety Manager, Sun Metro		
Jose Alvarez Sun Metro LIFT Safety & Operations Manager		
Felix Minjarez Jr., TSSP, PTSCTP – Bus/Rail Transit Superintendent of Operations, Streetcar		
Robert Dominguez Transit Superintendent of Operations, Sun Metro		
Everett Esparza, TSSP-Rail Chief Streetcar Officer		
Danny Meza Fleet Maintenance Manager		
Nick Ferriola, TSSP, PTSCTP - Bus/Rail Transit Safety & Security Officer		
Dwayne T. Arnold, TSSP, PTSCTP, Bus/Rail Assistant Director of Transit Operations		
Jerry DeMuro, Deputy Transit Officer		
Approved By	Signature	Date
Anthony R. DeKeyzer Director of Mass Transit – Sun Metro (Accountable Executive)		

Name of Entity	El Paso Streetcar - Sun Metro	
Approval by Joint Labor-Management Committee (Streetcar Safety Committee)	Name of Individual/Entity That Approved This Plan	Date of Approval
	Labor-Management Safety Committee	
	Relevant Documentation (title and location)	
	Public Transportation Agency Safety Plan (PTASP)	
Name of Entity	Mass Transit Department - Sun Metro	
Approval by the Board of Directors or an Equivalent Authority	Name of Individual/Entity That Approved This Plan	Date of Approval
	Mass Transit Board	
	Relevant Documentation (title and location)	
	Approval resolution	

PTASP Revision History Table

Date	Revision	Description of Change	Section or Page
April 2020	0	Original Document	
April 2021	1	Update headers and footers -	
		Terms and Definitions - 1. Safety Event 2. Drill 3. Designated personnel 4. Key Staff	
		Name of AE -	3.2
		Update Signature table Add Fixed Route Operations & Maintenance personnel and safety committee approval box with approval date.	Page 5
		Revision History Table	Page 6

Date	Revision	Description of Change	Section or Page
		Performance Measures - Use Frequency Rates instead of the number of events	3.3.5
		Add Fixed Route positions to Key Staff	3.4
		Update Sun Metro / EPSC Organizational Chart	3.4
		Revise section 5.3 regarding an investigation	5.3
		Internal Safety Audit update section Added 2021 Audit Schedule	5.4.1
		Update Section 5.6 Management of Change and the Program	5.6
		Review Training and Certification Plan	6.1.1
		Update the Hazardous Material program to include the fixed route	6.1.3
		Update the Drug & Alcohol Recordkeeping section	6.1.5
		Updated safety bulletin board photo	page 59
Nov 2021	2	Update the LIFT paratransit section, review definitions for FTA compliance, remove OSHA reference for Sun Metro, further define safety meetings, update the organizational chart, update the D&A section to include safety-sensitive positions, update safety performance measures, and reference the SMS Executive as an equivalent to the Chief Safety Officer.	
Sep 2022	3	Update headers and footers -	
		Update Signature table	Page 5
		Revision History Table	Page 6-8
		Added Acronyms	Pages 12-14

Date	Revision	Description of Change	Section or Page
		Added new Upper East Side Transfer Center	Page 16
		Performance Measures – removed projected	Pages 22-23
		Update Sun Metro / EPSC Organizational Chart	Pages 26-27
		Updated and added the SMS Executive Job Duties to the Streetcar Safety Manager	Page 28
		Updated Titles and added New Fixed Route positions to Key Staff	Pages 33-40
		Updated safety bulletin and added QR Code for Hazard reporting	Page 46
		I added New Bipartisan Infrastructure Law requirements: Risk Reduction Program, Exposure to Infectious Disease, Assault Awareness, and Prevention for Transit Operators.	Pages 67-69
Sep 2023	4	Updated signature Table	Page 5
		Revision History Table	Pages 8-9
		Corrected Acronyms	Page 14-17
		The organization's information was updated.	Pages 18-20
		Sec 2.1 Control and Updates Procedures was updated to coincide with Sec 4.4 of the TxDOT Program Standard, August 2023	Page 20-21
		Updated the Control Documentation notes	Page 23
		Updated the Performance Measures	Pages 27-28
		Updated title for the Managing Director in sec 3.4.1	Page 29

Date	Revision	Description of Change	Section or Page
		Updated the Sun Metro and Safety Organizations Charts	Page 30-31
		Sec 3.4.9 Sun Metro Transit Assistant Superintendent of Operations was updated.	Page 41-42
		Sec 3.4.10 Transit Safety & Security Officer was updated	Page 43
		Drug & Alcohol information for the Sun Metro Lift SMS Program was updated with 49 CRF 655 Federal Regulation.	Page 45
		Sec 3.6 Safety Management Policy Communication was updated with more detailed methods of SMP communication.	Page 51
		Sec 4.3.2 Hazard Severity was updated on the frequency of updating OHA's and or PHA's	Page 55
		Sec 5.5.1.4 Cycle/Schedule, sec 5.5.1.5 Checklist and Performance of Safety Audits – updated language to match current practice	Page 67
		Sec 5.5.1.6 Audit Report was updated to coincide with sec 4.7 of the TxDOT Program Standard, August 2023	Page 68
		Sec 5.5.3.3 Assault Awareness and Prevention for Transit Operators was updated to encompass Transit Employees.	Page 71-72
		Sec 5.6 Corrective Actions was updated to indicate the SSO tracker vs the name of the software and to address how the RTA will manage the immediate or emergency Corrective Action.	Page 72-73
		Sec 7.4 Emergency Drills and Exercises was updated	Page 86-87

Date	Revision	Description of Change	Section or Page
March 2024	5	Sec. 8 Risk-based Inspections was added to the document	Page 98-99
October 2024	5	Update Signature table	Page 6
		Revision History Table	Pag 10,11
		Updated Definitions	Page 12-18
		Updated the Introduction and removed Route 84 from the Sun Metro Service, and added information on the Brio information board status	Page 22 - 24
		Sec 2.1 Updated Control and update procedures	Pages 25-27
		Sec. 3.1 Safety Management	Page 28
		Sec 3.3 Safety Performance Measure	Pages 30-38
		Sec 3.4.1 Updated Sun Metro Director responsibilities	Page 39
		Sec 3. Safety Management Policy, added the Safety set-aside eligible under 49 U.S.C. 5307 for safety performance targets	Page 40
		Updated Sun Metro/Safety Department Organizational Charts	Pages 40-41
		Sec 4.2 Safety Hazard	Page 63
		Sec 4.5 Added the Roadway Workers Protection	Pages 69-70
		Added Sec 5.3.5 Allegations of non-compliance	Page 76
		Sec 5.4 Audit Report was updated to coincide with sec 4.7 of the TxDOT Program Standard, August 2024	Page 76 - 82
		Sec 5.5 Updated Corrective Action	Pages 82-84

Date	Revision	Description of Change	Section or Page
		Sec 5.3.3.1 Added Risk Reduction Tables	Pages 82-83
		Sec 5.6 Updated Management of Change	Pages 84-86
		Sec 6.2.1 Added the New requirements for the Labor-Management Safety Committee (LMSC)	Pages 93- 100
November 2025		Footer and Headers	All Pages
		Signature Page Updated names and Titles	Page 6
		Definitions and Acronyms to reflect RWP	Page 13-22
		2.1 Control and Update Procedure Updated sec to reflect RWP Requirements	Page 26
		3.0 Safety Management Policy Updated sec to reflect RWP Requirements	Page 30
		4 Safety Risk Management Updated sec to reflect RWP Requirements	Pages 66-74
		4.5 Roadway Worker Protection Updated sec to reflect RWP Requirements	Page 75
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		8 Risk-Based Inspections Updated sec to reflect RWP Requirements	Pages 117-119

DEFINITIONS

1. **Accident:** 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.
2. **Accountable Executive:** means a single, identifiable person who has ultimate responsibility for carrying out the Public Transportation Agency Safety Plan of a Transit agency; responsibility for carrying out the Transit agency's Transit Asset Management Plan; and control or direction over the human and capital resources needed to develop and maintain both the transit agency's Public Transportation Agency Safety Plan, in accordance with 49 U.S.C. 5329(d), and the transit agency's Transit Asset Management Plan in accordance with 49 U.S.C. 5326.
3. **Assault on a transit worker:** means, as defined under 49 U.S.C. 5302, a circumstance in which an individual knowingly, without lawful authority or permission, and with intent to endanger the safety of any individual, or with a reckless disregard for the safety of human life, interferes with, disables, or incapacitates a transit worker while the transit worker is performing the duties of the transit worker.
4. **Audit:** A review or analysis of records and related materials, including, but not limited to, those related to financial accounts.
5. **CDC** means the Centers for Disease Control and Prevention of the United States Department of Health and Human Services.
6. **Chief Safety Officer:** means an adequately trained individual responsible for safety and reports directly to a transit agency's Director, general manager, president, or equivalent officer. A Chief Safety Officer may not serve in other operational or maintenance capacities unless employed by a transit agency that is a small public transportation provider as defined in 49 CFR 673.5 or a public transportation provider that does not operate a rail fixed guideway public transportation system.
7. **CFR: The Code of Federal Regulations**, which is a compilation of all the rules and regulations issued by federal agencies, including the FTA.
8. **Consultation:** the process of seeking, discussing, and considering the views of other participants, and, where feasible, seeking agreement with them regarding matters.
9. **Contractor:** An entity that performs tasks on behalf of FTA, a State Safety Oversight Agency, or a Rail Transit Agency, through a contract or other agreement
10. **Corrective Action Plan (CAP):** A plan developed by a Rail Transit Agency that describes the actions the Rail Transit Agency will take to minimize, control, correct, or eliminate risks and hazards, and the schedule for taking those actions. Either a State Safety Oversight Agency or FTA may require a Rail Transit Agency to develop and carry out a Corrective Action Plan.
11. **Day:** A calendar day, which means a 24-hour period beginning at 12:00 a.m. and ending at 11:59 p.m. local time.
12. **Designated personnel** means:
 - (1) Employees and contractors identified by a recipient whose job function is directly responsible for safety oversight of the public transportation system of the public transportation agency; or

- (2) Employees and contractors of a State Safety Oversight Agency whose job function requires them to conduct safety audits and examinations of the rail fixed guideway public transportation systems subject to the jurisdiction of the agency.
13. **Direct recipient** means an entity that receives Federal financial assistance directly from the Federal Transit Administration.
14. **Directly responsible for safety oversight** means public transportation agency personnel whose primary job function includes developing, implementing, and reviewing the agency's safety plan, and/or the SSOA requirements for the rail fixed guideway public transportation system under 49 CFR parts 659 or 674.
15. **Drill**: A supervised activity to test a procedure that is a component of the overall PTASP, Emergency Management Plan, or any other Sun Metro Document. A drill may be a step leading towards an exercise, or it can also be an actual field response. The true value of a drill lies in its ability to highlight a limited portion of the overall Emergency Management Plan and to examine it closely. (APTA SS-SEM-S-004-09 Rev. 1| General Guidance on Transit Drills and Exercises)
16. **Emergency** means, as defined under 49 U.S.C. 5324, a natural disaster affecting a wide area (such as a flood, hurricane, tidal wave, earthquake, severe storm, or landslide) or a catastrophic failure from any external cause, as a result of which the Governor of a State has declared an emergency and the Secretary has concurred; or the President has declared a major disaster under section 401 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. 5170).
17. **An equivalent entity** means an entity that carries out duties similar to those of a Board of Directors, for a recipient or sub-recipient of FTA funds under 49 U.S.C. Chapter 53, including the sufficient authority to review and approve a recipient or sub-recipient Public Transportation Agency Safety Plan.
18. **Examination** means a process for gathering or analyzing facts or information related to the safety of a public transportation system.
19. **FRA**: The Federal Railroad Administration is an agency within the United States Department of Transportation
20. **FTA** means the Federal Transit Administration, an operating administration within the United States Department of Transportation.
21. **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.
22. **Hazard Analysis**: The method by which hazards are identified and analyzed as to their possible effects on the safe operation of the entire system (i.e., Failure Mode and Effect Analysis, Fault Tree Analysis, Stress Analysis, etc.)
23. **Hazard Identification**: formal activities to analyze potential consequences of hazards during operations related to the provisions of service
24. **Hazardous Condition**: An immediate condition that could cause a safety event involving personal injuries or death
25. **Immediate Safety Concern**: A condition or situation that poses an urgent risk to the safety of employees, passengers, or the public, and requires immediate action to mitigate or eliminate the threat to prevent injury, fatality, or significant property damage.
26. **Injury**: Any physical damage or harm to persons as a result of a safety event that requires immediate medical attention away from the scene

27. **Inspection:** a physical observation of equipment, operations, or records for the purpose of gathering or analyzing facts or information.
28. **Investigation** means the process of determining the causal and contributing factors of a safety event, or hazard, to prevent recurrence and mitigate risk.
29. **Joint Labor-management:** A cooperative arrangement between representatives of labor (employees, often through a union) and management (employers or organizational leadership) that aims to address workplace issues, resolve conflicts, and improve organizational outcomes through collaboration and shared decision-making.
30. **Key Staff:** Sun Metro managing positions responsible for the implementation of Sun Metro's Agency Safety Plan.
31. **Large, urbanized area:** An urbanized area with a population of 200,000 or more, as designated by the U.S. Census Bureau.
32. **Maintenance Data:** Data that includes, but is not limited to, major maintenance activity schedule and progress, adherence to maintenance schedules, including reports/documentation of deferred maintenance records of failures and defects with severity if applicable, and records of revenue vehicles out of service, including casual information.
33. **Mode Safety Manager:** Safety Manager assigned to a specific transportation mode in Sun Metro
34. **National Public Transportation Safety Plan** means the plan to improve the safety of all public transportation systems that receive Federal financial assistance under 49 U.S.C. Chapter 53.
35. **Near Miss:** An unplanned event that had the potential to result in injury, illness, damage to property, or environmental harm but did not actually cause any of these outcomes, either due to intervention or by chance.
36. **NTSB:** National Transportation Safety Board, an independent federal agency
37. **NTD: National Transit Database (NTD)** is a comprehensive database maintained by the FTA that collects and reports on public transportation statistics in the U.S. It includes data on ridership, financials, operations, and safety performance across various transit agencies. The NTD is used to assess the performance of transit systems, allocate federal funds, and inform policy decisions.
38. **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.
39. **Operator of a public transportation system** means a provider of public transportation as defined under 49 U.S.C. 5302(14). *Public transportation agency* means an entity that provides public transportation service as defined in 49 U.S.C. 5302, and that has one or more modes of service not subject to the safety oversight requirements of another Federal agency.
40. **Performance measure** means an expression based on a quantifiable indicator of performance or condition that is used to establish and assess progress toward meeting the established targets.
41. **Performance target** means a quantifiable level of performance or condition, expressed as a value for the measure, to be achieved within a period required by the Federal Transit Administration (FTA).
42. **Person:** A passenger, employee, contractor, pedestrian, trespasser, or any individual on the property of a rail's fixed guideway public transportation system

43. **Potential Consequence:** The anticipated outcome or impact of a hazard that could negatively affect an organization's safety objectives, such as causing injuries, fatalities, damage to property, or disruptions to service.
44. **Public Transportation:** Regular, continuing, shared-ride surface transportation services that are open to the general public or a segment of the general public and are provided by various modes, such as buses, subways, light rail, commuter rail, trolleys, and ferries.
45. **Public Transportation Agency Safety Plan (PTASP)** means the documented comprehensive agency safety plan for a transit agency that is required by 49 U.S.C. 5329 and this part.
46. **Public Transportation Safety Certification Training Program:** The certification training program for federal and state employees or other designated personnel who conduct safety audits and examinations of public transportation systems. Employees of public transportation agencies directly responsible for safety oversight are also required to complete the PTSCTP.
47. **Publicly Accessible Areas:** Means stations, platforms, vehicles in revenue service, roadway, sidewalk, park, walkway, or other areas open to the general public.
48. **Rail fixed guideway public transportation system** means any fixed guideway system that uses rail, is operated for public transportation, is within the jurisdiction of a State, and is not subject to the jurisdiction of the Federal Railroad Administration, or any such system in engineering or construction. Rail fixed guideway public transportation systems include, but are not limited to, rapid rail, heavy rail, light rail, monorail, trolley, inclined plane, funicular, and automated guideway.
49. **Rail Transit Agency** means any entity that provides services on a rail fixed guideway public transportation system.
50. **Recipient** means a State or local governmental authority or any other operator of a public transportation system receiving financial assistance under 49 U.S.C. Chapter 53.
51. **NTD Reportable Event:** Existence of one or more of the following:
 - (1) A fatality confirmed within 30 days (including suicide)
 - (2) An injury requiring immediate medical attention away from the scene for one or more persons (partial exception in the case of Other Safety Occurrences Not Otherwise Classified)
 - (3) Estimated property damage equal to or exceeding \$25,000
 - (4) An evacuation due to or under hazardous conditions or to the rail Right-Of-Way
 - (5) Collisions involving transit vehicles that require towing away of a transit roadway vehicle or other non-transit roadway vehicles
 - (6) Rail transit vehicle collisions occurring at a grade crossing
 - (7) Rail transit vehicle collisions with an individual on the rail right-of-way or another revenue or non-revenue rail transit vehicle
 - (8) A mainline or yard derailment of revenue or non-revenue vehicles
 - (9) Security Events
 - (10) Terrorism-related events
 - (11) Bomb threat (Credible)
 - (12) Bombing (Occurring)
 - (13) Chemical / Biological / Radiological / Nuclear release
 - Other system security events:
 - Arson

- Sabotage
- Hijacking
- Cyber-Attack
- Other personal events:
 - Aggravated assault
 - Rape
 - Suicide
 - Attempted suicide (Survived attempt)
 - Vandalism (See dollar limits)
 - Robbery (See dollar limits)
 - Burglary (See dollar limits)
 - Motor vehicle theft (Proven by Police)
 - Larceny/theft (See dollar limits)
 - Homicide

52. **Risk** means the composite of predicted severity and likelihood of the potential effect of a hazard.
53. **Risk-based Inspection:** An inspection conducted as part of a risk-based inspection program.
54. **Risk-based Inspection Data Management System:** A physical or digital system that follows administrative policies and procedures that identify data storage, organization, and management processes for risk-based inspections.
55. **Risk-based Inspection Program** A risk-based inspection program uses qualitative and quantitative data analysis to inform ongoing inspection activities. Risk-based inspection programs are designed to prioritize inspections to address safety concerns and hazards associated with the highest levels of safety risk.
56. **Risk Mitigation** means a method or method to eliminate or reduce the effects of hazards.
57. **Roadway:** That portion of a highway, including shoulders, designed for vehicular travel.
58. **Sabotage:** The deliberate destruction of transit property or the slowing down of public transit operations by employees with the intention of damaging business or the economic condition of the transit agency
59. **Safety Assurance** means processes within a transit agency's Safety Management System that function 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.
60. **Safety Audit** means a review or analysis of safety records *and related* materials, including, but not limited to, those related to financial accounts.
61. **Safety Committee:** the formal joint labor-management committee on issues related to safety that is required by 49 U.S.C. 5329 and this part.
62. **Safety Event:** an unexpected outcome resulting in injury or death; damage to or loss of the facilities, equipment, rolling stock, or infrastructure of a public transportation system; or damage to the environment. Accidents as defined by FTA, Incidents as defined by FTA, Occurrences as defined by FTA, including near-misses, red signal overrun, improper door operation, wrong route, and unexpected service shut down for a safety reason.

63. **Safety Management Policy** means a transit agency's documented commitment to safety, which defines the transit agency's safety objectives and the accountabilities and responsibilities of its employees regarding safety.
64. **Safety Management System (SMS)** means 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.
65. **Safety Management System (SMS) Executive** means a Chief Safety Officer or an equivalent. The Safety Management System Executive fulfills the duties of the Chief Safety Officer in accordance with the TxDOT Program Standard and 49 CFR 673. The SMS Executive has the authority and responsibilities of the day-to-day implementation and operation of the agency's SMS and may serve in roles that have a nexus to safety, such as security, asset management, and training (C.F.R. Part 673.5)
66. **Safety Performance Target** means a Performance Target related to safety management activities.
67. **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.
68. **Safety Program Data:** means data that includes, but is not limited to, event data, hazard data, safety risk ratings, mitigation data, CAP data, near-miss data, and ongoing monitoring data.
69. **Safety Risk:** means the composite of predicted severity and likelihood of a potential consequence of a hazard.
70. **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.
71. **Safety Risk Mitigation:** means a method or methods to eliminate or reduce the severity and/or likelihood of a potential consequence of a hazard.
72. **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 risks.
73. **Safety Set-aside:** means the allocation of not less than 0.75 percent of assistance received by a large urbanized area provider under 49 U.S.C. 5307 to safety-related projects eligible under 49 U.S.C. 5307.
74. **Serious Injury** means any injury which:
 - (1) Requires hospitalization for more than 48 hours, commencing within 7 days from the date 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; orInvolves second or third-degree burns or any burns affecting more than 5 percent of the body surface.
75. **Small public transportation provider** means a recipient or sub-recipient 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.

- 76. **SSOC:** Safety & Security Operations Committee
- 77. **SSP:** System Security Plan.
- 78. **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.
- 79. **State of Good Repair** means the condition in which a capital asset can operate at a full level of performance.
- 80. **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 outlined in 49 CFR part 674.
- 81. **Transit Agency** means an operator of a public transportation system.
- 82. **Transit Asset Management Plan** means the 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, to provide safe, cost-effective, and reliable public transportation, as required by 49 U.S.C. 5326 and 49 CFR part 625.
- 83. **Transit Worker:** means any employee, contractor, or volunteer working on behalf of the transit agency.
- 84. **TTP:**
- 85. **Subsystem:** An element of a system that, in itself, may constitute a system
- 86. **Urbanized Area:** means, as defined under 49 U.S.C. 5302, an area encompassing a population of 50,000 or more that has been defined and designated in the most recent decennial census as an urban area by the Secretary of Commerce.
- 87. **Vehicle:** Any rolling stock used on a rail's fixed guideway public transportation system, including, but not limited to, passenger and maintenance vehicles.

Acronyms

AAR	After-Action Reports
ADA	Americans with Disabilities Act
AE	Accountable Executive
ANSI	American National Standards Institute
APTA	American Public Transit Association
AVL	Automatic Vehicle Locator
BRT	Bus Rapid Transit
CAP	Corrective Action Plan(s)
CCR	Configuration Change Request
CDC	Centers for Disease Control
CFR	Code of Federal Regulations
COOP	Continuity of Operations Plan
CSO	Chief Safety Officer
CSO	Chief Streetcar Officer
DHS	Department of Homeland Security
DOD	United States Department of Defense
EMA	Emergency Management Agency
EMP	Emergency Management Plan
ERP	Emergency Response Plan
EPSC	El Paso Streetcar
ESRP	Employee Safety Reporting Program
EX	Emergency Exercise
FLSC	Fire Life Safety Committee
FSE	Full-Scale Exercise
FTA	Federal Transit Administration
GPS	Global Positioning Satellite
HSEEP	Homeland Security Exercise and Evaluation Program
ICS	Incident Command System
ID	Identification
ISA	Internal Safety Audit
ITP	Individual Training Program
KPI	Key Performance Indicators
MAP-21	Moving Ahead for Progress in the 21 st Century
MIL-STD	Military Standard
MPO	Metropolitan Planning Organization
MSDS	Material Safety Data Sheets
MSF	Maintenance and Storage Facility
MTI	Manager of Streetcar Infrastructure
N/A	Not Applicable
NFPA	National Fire Protection Association
NIOSH	National Institute for Occupational Safety and Health
NPTSP	National Public Transportation Safety Plan
NSC	National Safety Council
NSP	National Safety Plan, <i>also see NPTSP</i>
NTD	National Transit Database

NTI	National Transportation Institute
NTSB	National Transportation Safety Board
O&M	Operation and Maintenance
OCS	Overhead Contact Systems
OEM	Original Equipment Manufacturer
OMP	Operations and Maintenance Plan
OSHA	Occupational Safety and Health Administration
PHA	Preliminary Hazard Analysis
PM	Preventive Maintenance
PMI	Preventive Maintenance Inspection
PMMS	Preventive Maintenance Management System
PPE	Personal Protective Equipment
PRO	Pre-Revenue Operations
PTASP	Public Transportation Agency Safety Plan
PTSCTP	Public Transportation Safety Certification Training Program
QA	Quality Assurance
QC	Quality Control
RFGPTS	Rail Fixed Guideway Public Transportation System
ROW	Right-Of-Way
RTA	Rail Transit Agency
RWP	Roadway Worker Protection
SA	Safety Assurance
SDS	Safety Data Sheet, <i>also see MSDS</i>
SGR	State of Good Repair
SIT	System integration testing
SME	Subject Matter Expert
SMS	Safety Management System
SMP	Standard Maintenance Procedures
SOP	Standard Operating Procedures
SPC	Safety Performance Criteria
SPI	Safety Performance Indicators
SPT	Safety Performance Targets
SRA	Safety Risk Analysis
SRCP	Safety Rules Compliance Program
SRL	Safety Risk Log
SRM	Safety Risk Management
SSC	Safety and Security Certification
SSCP	Safety and Security Certification Plan(s)
SSEPP	System Security and Emergency Preparedness Plan
SSO	State Safety Oversight
SSOA	State Safety Oversight Agency
SSPP	System Safety Program Plan
SSPS	State Safety Oversight Program Standard
SSRC	Safety and Security Review Committee
SSWG	Safety and Security Working Group
TAM	Transit Asset Management Plan
TxDOT	Texas Department of Transportation

TPSS	Traction Power Sub Station
TSA	Transportation Security Administration
TSSO	Transit Safety & Security Officer
TTP	Technical Training Plan
TTX	Tabletop Exercise
TVA	Threat and Vulnerability Analysis
U.S.C.	United States Code
UC	Unified Command
VRM	Vehicle Revenue Miles
WSO	World Safety Organization

1. Introduction

1.1. Organization

To meet the population growth, the city of El Paso, a large Urbanized area, Sun Metro offers fixed routes and paratransit - Living Independently Facilitated by Transit (LIFT) services. Sun Metro is one of the largest city departments with 621 employees and an FY 2023 - 2024 annual budget of \$102.5 million. Its fixed route and LIFT bus services are offered within El Paso City limits. Its fixed routes and LIFT bus services traveled 10.2 million revenue miles in the pre-pandemic year.

The fixed-route service consists of 59 routes with 101 vehicles transporting passengers. These routes provide about 6.6 million bus passenger trips a year. The LIFT service consists of 48 LIFT vehicles and 7,000 participants who made 214,500 trips during the fiscal year 2024. Sun Metro operates a large natural gas-fueled fleet, fueled primarily through alternative fuels – CNG, including all passenger support vehicles.

On November 12, 2018, the El Paso Streetcar began service. The El Paso Streetcar route highlights all the wonderful things that make El Paso downtown and uptown a unique place to visit. The 4.8-mile route runs in two loops through El Paso's uptown and downtown areas. Both loops interconnect through a single-tracked corridor, an international bridge, and an array of businesses, restaurants, government buildings, the Convention Center, the downtown ballpark, and the University of Texas at El Paso, among many other prominent locations. As part of this project, six vintage streetcars (the same vehicles that ran on El Paso streets until 1974) were restored for the rigors of daily service. While the streetcars are decades old, they are outfitted with modern amenities, including:

- Seating for approximately 35 people and additional space for standing riders
- Free Wi-Fi
- ADA Accessibility
- Bike racks
- Air conditioning
- Heating
- Upgrades for safety
- Modern propulsion
- Streetcar branding along the route and signage at designated stops
- Pavement, sidewalk, and driveway improvements at designated stops, Shelters, and Benches



El Paso Streetcar

The highest transportation priority for both the City and Sun Metro is the implementation of a five-line, citywide BRT/TOD corridor system that connects with other regional and local bus services as well as rail, air, and ground transportation. Corridors include:

- International/Downtown/Central El Paso – serviced by the other four corridors, services the international border area to Glory Road and the University of Texas at El Paso campus.
- Mesa/Westside Corridor – services Northwest El Paso and Southeast New Mexico.
- Alameda/North Loop/Mission Valley Corridor – services Alameda Street and far-Southeast El Paso, connecting to an El Paso County-operated Rural Transit line that provides limited fixed-route service to East Montana and the Mission Valley area incorporated cities.
- Montana Corridor – services East and Far East El Paso to the Upper Eastside Transfer Center located off Edgemere Blvd. and RC Poe Rd.
- Dyer Corridor – services Northeast El Paso and Fort Bliss.

Brio, a Spanish word for excitement, verve, and energy, is the term used to describe and brand El Paso's BRT system. In addition to Transit Terminals, each BRT Corridor has several Brio stations that are well-lit and rider-friendly. Amenities include Wi-Fi hotspots, automated Brio status



Brio Roadway and TOD Stations



Sixty-foot Articulated Brio Bus

information boards, and prepaid ticket vending machines. The stations comply with all City, State, and Federal regulations. Where feasible, public art displays selected or designed by the

City's Museums and Cultural Affairs Department Public Art Division are included either as standalone pieces or as components of improvements throughout each corridor.

The 60-foot articulated Brio buses run on CNG fuel with a 400-mile capacity and a seven-minute fill-up time. They are well equipped to keep the modern-day rider comfortable and informed of their destination while staying in touch with work, family, and friends, or just enjoying the ride with amenities such as announcement monitors, Wi-Fi, and bike racks.

Sun Metro received the following FTA funding:

FEDERAL FUNDING TYPE	FY25 FEDERAL FUNDING
FEDERAL TRANSIT ADMINISTRATION (FTA)	
Areas of Persistent Poverty Program	\$ 360,000.00
Buses and Bus Facilities Formula Program - 5339(a)	\$ 10,096,564.00
Capital Investment Grants - 5309	\$ 3,393,813.00
Community Project Funding/Congressionally Directed Spending	\$ 720,000.00
Flexible Funding Programs - Congestion Mitigation and Air Quality Program - 23 USC 149	\$ 4,335,650.00
Helping Obtain Prosperity for Everyone Program	\$ 18,359.00
Low or No Emission Grant Program - 5339(c)	\$ 39,473,712.00
Public Transportation COVID-19 Research Demonstration Grant Program	\$ 1,748.00
Route Planning Restoration Program	\$ 140,361.00
Urbanized Area Formula Grants - 5307	\$ 37,978,965.00
Enhanced Mobility of Seniors & Individuals with Disabilities - Section 5310	\$ 307,040.00
	\$ 96,826,212.00
FEDERAL EMERGENCY MANAGEMENT AGENCY (FEMA)	
Transit Security Grant Program	\$ 841,437.00
TOTAL FEDERAL FUNDING FOR FY25	\$ 97,667,649.00

2. Annual PTASP Review and Update Process

2.1. Control and Update Procedures

Sun Metro maintains a structured and documented process for controlling and updating the Public Transportation Agency Safety Plan (PTASP). In accordance with 49 CFR Part 673 and 49 CFR Part 671, all updates triggered by regulatory changes, safety risk findings, or Roadway Worker Protection (RWP)-specific requirements must be incorporated into this PTASP within **12 months** or sooner if required by FTA, TxDOT SSOA, or internal directive.

The Sun Metro PTASP will undergo an annual review, starting from a baseline date of October 1st, and is updated periodically on an as-needed basis to include:

- **ASP Annual Reviews:** The PTASP is subject to annual reviews.
- Revisions involving Roadway Worker Protection (RWP), redundant protection requirements, RWIC procedures, lone worker rules, or OCC communication standards must be reviewed by the Safety Department immediately upon issuance of new federal guidance.
- The **RWP Program Manager** and **Safety Manager** jointly assess whether revisions to the RWP Manual require corresponding PTASP changes.
- All PTASP revisions must be approved by Sun Metro Executive Leadership and City of El Paso as required.
- Revision documentation will include:
 - Summary of changes
 - RWP program impact assessment
 - Effective date and implementation schedule
- PTASP updates must be communicated to all supervisors, roadway workers, and EPSC staff.
- RTA conducts reviews no later than October 1st each year.
- **Notification to TxDOT:** The RTA must inform TxDOT via email whether the ASP is current or requires updates.
- **Detailed Update Notification:** If updates are needed, the email notification must specify the areas requiring modification and provide an estimated completion date.
- **Submittal of the Draft PTASP:** El Paso Streetcar/Sun Metro will submit a draft of the PTASP on November 15th.
- **Approval Deadline:** The revised ASP must receive approval from each RTA no later than December 31st.
- **Submission Deadline:** The revised ASP must be submitted to TxDOT no later than January 31st.

These processes ensure the PTASP remains current, accurate, and aligned with the evolving needs and standards of our system and comply with the recordkeeping requirements of 49 CFR 673 subpart (E)

The following process is used to update and support the Sun Metro PTASP:

- I. The City of El Paso and Sun Metro personnel will work cooperatively with the Chief Safety Officer or SMS Executive, Accountable Executive, and Sun Metro Management to update their safety record and to evaluate the Sun Metro PTASP effectiveness.
- II. The Sun Metro Safety Managers will review the Sun Metro PTASP and advance proposed updates to the Chief Safety Officer or SMS Executive for review and approval.
- III. The Chief Safety Officer or SMS Executive will forward the updated Sun Metro PTASP and the Streetcar section to TxDOT - SSO for their review and comments.
- IV. The TxDOT - SSO will return the Sun Metro PTASP with the Streetcar section with comments to the Chief Safety Officer or SMS Executive:
- V. The TxDOT-SSO comments of Sun Metro PTASP with the Streetcar section will be reviewed by the Accountable Executive, Chief Safety Officer or SMS Executive, Sun Metro Director of Mass Transit, Chief Streetcar Officer & and the Streetcar Safety Manager.
- VI. If TxDOT-SSO has no comments, they will submit a letter of approval of the Sun Metro PTASP and the Streetcar section. At that moment, the document will be copied and distributed in accordance with EPSC Sun Metro PTASP and the Streetcar section distribution list.
- VII. The approved plan will be published and distributed to all Sun Metro Managers and pertinent Sun Metro members for implementation according to an established distribution list.

2.2. Implementation Activities and Responsibilities

Sun Metro has defined specific tasks to implement the goals and objectives of the System Safety Program Plan. The personal safety and security of passengers and employees are Sun Metro's highest priorities.

2.3. Annual Sun Metro PTASP Review

Before September 1st of each year, Sun Metro will conduct a review of its PTASP and notify TxDOT via email if the PTASP is current or requires an update. If the RTA determines the PTASP must be updated, the notification shall summarize the areas requiring an update and the anticipated date the revised PTASP will be submitted to TxDOT. The revised PTASP must be approved by each RTA no later than December 31st and submitted to TxDOT no later than January 31st, signed by the Director of Mass Transit as the Accountable Executive, indicating the Sun Metro PTASP is current and in compliance with the SSO Program Standard (for the streetcar only).

If the Accountable Executive determines the Sun Metro PTASP is not current, the letter shall detail the activities that will be taken to achieve compliance and the internal deadline for submitting the Sun Metro PTASP and supporting materials to TxDOT for approval.

The Chief Safety Officer or SMS Executive is responsible for the preparation, maintenance, and updating of the Sun Metro PTASP. The Sun Metro PTASP evaluation process for Sun Metro will consist of the following steps:

- I. Sun Metro staff will submit an updated/revised version of the Sun Metro PTASP to the Accountable Executive for review.

- II. After approval from the Accountable Executive (AE), the Chief Safety Officer (CSO) or SMS Executive will submit the PTASP to TxDOT.
- III. TxDOT will acknowledge receipt of a Sun Metro PTASP submission.
- IV. If the submission is approved, TxDOT will acknowledge acceptance within 45 days.
- V. If the submission is not approved, TxDOT will notify Sun Metro to request additional documentation or clarification. Upon receipt of the requested documentation or clarification, the process will begin anew.
- VI. If the Sun Metro PTASP does not comply with federal rules or the TxDOT SSO Program Standard for El Paso Streetcar, the CSO / SMS Executive & AE will be notified via a formal letter. A completed checklist identifying the required changes and any required documentation will be included.
- VII. Upon TxDOT's final acceptance, approval will be communicated via a formal letter to the Accountable Executive.

2.3.1. Control of Documents

Sun Metro will follow established processes for the Control and Distribution of Plans, Manuals, Policies, and Procedures, and the ASP. Documents are reviewed and updated as necessary and re-approved. These documents were last reviewed and modified as necessary following the previous revision of the ASP. The controls needed for implementation are:

- I. Approve documents for adequacy prior to issue
- II. Review and update as necessary, and re-approve documents
- III. Ensure changes and the current revision status of documents are identified
- IV. Ensure current versions of applicable documents are available at points of use
- V. Ensure documents remain legible and readily identifiable
- VI. Prevent the unintended use of obsolete documents and apply suitable identification to them if they are retained for any purpose.

Employees and subcontractors shall use the specified or latest revision of specifications or controlled documents to include documents of external origin.

The employees and contractors will be retrained each time the Sun Metro PTASP is updated. In addition, the distribution list of the Sun Metro PTASP will be used to guarantee every party has the latest version of the Sun Metro PTASP.

Each time the Sun Metro PTASP is updated, all personnel included in the Sun Metro PTASP distribution list and subcontractors will be notified via e-mail. This notification will also include the date when they can pick up the updated version.

2.3.2. Control of Records

Records are established and maintained to provide evidence of conformity to requirements and for the effective operation of the quality management system and compliance with the recordkeeping requirements of 49 CFR 673 subpart (E). Records shall remain legible, readily identifiable, and retrievable. Sun Metro Control of Public Records defines the controls needed for the identification, storage, protection, retrieval, retention time, and disposition of records.

The type of document used will vary depending on the type of activity. The following is a list of activities and the type of document used to document them:

Activity	Type of Document
Inspections	Checklist Photos Evidence that the finding has been corrected
Audits	Notification letters Auditing Checklist Auditing report with supportive documentation Corrective Actions generated by the audit
Safety Meetings	Agendas Attendant Sheet
Training	Agenda Attendant sheet Training material

*Agency Safety Plan (PTASP) and SMS related documents must be kept for no less than 3 calendar years. This is consistent with the Texas Local Government Schedule.

3. Safety Management Policy Chapter (CFR 673.23)

3.1. Safety Management Policy Overview

Sun Metro leadership commits to a proactive safety culture that incorporates roadway worker protections as required by **49 CFR Part 671**. The Safety Management Policy affirms:

- All employees have the **right and responsibility** to use the **Good Faith Challenge** process if they identify unsafe track conditions, missing protections, or unsafe instructions during roadway work.
- Roadway Worker-in-Charge (RWIC) authority is recognized and supported agency-wide; the RWIC has **full stop-work authority** within the roadway work zone.
- Lone workers are restricted to duties allowed under the EPSC RWP Manual and 49 CFR 671.33.
- The Operations Dispatcher must verify redundant protections before authorizing track access.
- No roadway worker may access the trackway without proper training, qualification, and certification.
- Safety performance, including RWP compliance, is incorporated into management accountability.

The Safety Management Policy applies to all employees, contractors, and visitors working on or near the guideway.

3.2. Safety Management Policy Section

Sun Metro's **safety objectives** include the following:

Passenger safety:

- Reduce the number of passenger injuries from falls, slips, and collisions.
- Minimize incidents related to boarding and disembarking.
- Decrease the rate of passenger assaults.

Operational safety:

- Lower the rate of vehicle collisions with other vehicles or pedestrians.
- Reduce mechanical failures and delays due to maintenance issues.
- Improve driver alertness and adherence to safety procedures.

Station safety:

- Implement measures to prevent platform falls.
- Improve lighting and visibility in stations.
- Enhance security measures to deter criminal activity.

Emergency preparedness:

- Develop and regularly practice emergency response plans
- Ensure adequate training for staff on emergency procedures
- Improve communication systems for emergencies

It is our mission to connect people and places, support economic development, and improve the quality of life in the region. Because of this, Safety is of paramount concern.

All personnel and contractors are charged with responsibility for the safety of passengers, employees, property, and those who come in contact with our systems. Specific accountability for safety rests with those responsible for the management of each function or location. Sun Metro management will review the Safety Program's effectiveness, provide resources needed to correct deficiencies, and work with the Texas Department of Transportation and other agencies involved in the oversight of safety to achieve the safest and highest quality system possible.

The Chief Safety Officer or SMS Executive is tasked to devise, implement, and administer a comprehensive, integrated, and coordinated Public Transit Agency Safety Plan (PTASP). It is the responsibility of the Chief Safety Officer or SMS Executive and Sun Metro Key Staff to implement and execute SMS to prevent, eliminate, control, and/or reduce hazards of any system under the jurisdiction of Sun Metro. The Chief Safety Officer or SMS Executive will perform, oversee, and/or review all activities related to hazard management. Management of hazards includes the legitimate right, in coordination with the affected department manager, to stop unsafe operations when the hazard identified poses an imminent danger to life and/or property.

The Chief Safety Officer or SMS Executive will perform, oversee, and/or review all activities related to hazard management. Management of hazards includes the legitimate right, in coordination with the affected department manager, to stop unsafe operations when the hazard identified poses an imminent danger to life and/or property.

It is the Sun Metro & and the City of El Paso's policy to fully support an ongoing Safety Program in which preventive concepts are utilized in identifying and resolving hazards. However, the success of the Safety Program depends on the sincere and cooperative efforts and active participation of all employees. It is, therefore, the responsibility of each Sun Metro employee and Contractor to actively participate in the safety process, provide requested information, and support and aid in any investigations.

Approved By

Anthony R. DeKeyser
(Accountable Executive)

Signature

Date

3.3. Performance Target (based on Nat. Pub. Trans Safety Plan)

Safety performance measurement will help the City of El Paso and Sun Metro monitor their safety performance. The measurement and evaluation of safety performance require a carefully structured program of planning, setting targets, identifying valid measures, conducting proper data analysis, and implementing appropriate follow-up activities. Safety performance measurement is a key aspect of a safety management process and provides the basis for continuous safety improvement.

Pursuant to compliance with 49 U.S.C. § 5329(d), the Sun Metro Agency Safety Plan must include safety performance targets based on the safety performance measures in the FTA National Safety Plan. The safety performance measures are:

Safety Performance Measure	Description
<i>Measure 1a – Major Events</i>	This includes all safety and security major events as defined by the NTD.
<i>Measure 1b – Major Event Rate.</i>	This includes all safety and security major events as defined by the NTD, divided by VRM.
<i>Measure 1.1 – Collision Rate (new)</i>	This includes all collisions reported to the NTD, divided by VRM.
<i>Measure 1.1.1 – Pedestrian Collision Rate (new)</i>	This includes all collisions “with a person,” as defined by the NTD, divided by VRM.
<i>Measure 1.1.2 – Vehicular Collision Rate (new)</i>	This includes all collisions “with a motor vehicle,” as defined by the NTD, divided by VRM.
<i>Measure 2a – Fatalities</i>	This includes all fatalities as defined by the NTD.
<i>Measure 2b – Fatality Rate</i>	This includes all fatalities as defined by the NTD, divided by VRM.
<i>Measure 2.1 – Transit Worker Fatality Rate (new)</i>	This includes all transit worker fatalities as defined by the NTD, including the categories “Transit Employee/Contractor,” “Transit Vehicle Operator,” and “Other Transit Staff,” divided by VRM.
<i>Measure 3a – Injuries</i>	This includes all injuries as defined by the NTD.
<i>Measure 3b – Injury Rate.</i>	This includes all injuries as defined by the NTD, divided by VRM.

Safety Performance Measure	Description
<i>Measure 3.1 – Transit Worker Injury Rate (new)</i>	This includes all transit worker injuries as defined by the NTD, including the categories “Transit Employee/Contractor,” “Transit Vehicle Operator,” and “Other Transit Staff,” divided by VRM.
<i>Measure 4a – Assaults on Transit Workers (new)</i>	This includes all assaults on transit workers as defined by the NTD.9
<i>Measure 4b – Rate of Assaults on Transit Workers (new)</i>	This includes all assaults on transit workers as defined by the NTD, divided by VRM.
<i>Measure 5 – System Reliability</i>	This includes Major Mechanical System failures as defined by the NTD.

Successful performance targets are **specific, measurable, attainable, relevant, and time-bound** (SMART). As part of the annual review of Sun Metro's Agency Safety Plan, Sun Metro shall reevaluate its safety performance measures and determine how the measures should be refined, sub-measures developed, and performance targets selected annually.

If the Safety Targets are not met, it will be the responsibility of the City of El Paso and Sun Metro Management to assess the situation and determine the root cause. Once the root cause has been determined, the appropriate Safety Manager, in coordination with the CSO will develop the corrective actions needed to mitigate the situation.

All Sun Metro employees are responsible for following all rules and procedures established by management to achieve the performance measures established in this document.

3.3.1. Major Events

3.3.1.1. Fatalities

Fatality is defined as a death occurring at the scene or within 30 days of the major event and includes suicides. It does not include deaths in or on transit property, which result from illness or other natural causes.

3.3.1.2. Injuries

Injuries are defined as any damage or harm to persons as a result of an event that requires immediate medical attention away from the scene. In addition, FTA has established the term “Serious Injury”. A Serious Injury is defined at 49 C.F.R. § 674.7 as any injury that:

1. Requires hospitalization for more than 48 hours, commencing within 7 days from the date the injury was received;
2. Results in a fracture of any bone (except simple fractures of fingers, toes, or nose);
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.

For the injury safety performance measure, FTA uses the NTD definition of injury (harm to a person requiring immediate medical attention away from the scene). FTA uses injuries reported on both the NTD S&S-40 (major) and S&S-50 (non-major) forms and excludes injuries resulting from assaults and other crimes (security events). This means Sun Metro may have to report a crime-related injury to the NTD, but Sun Metro would exclude that injury when calculating its injury performance measure.

3.3.1.3. Substantial Damage

Damage to any involved vehicles, facilities, equipment, rolling stock, or infrastructure that disrupts the operations of the rail transit agency and adversely affects the structural strength, performance, or operating characteristics of the asset, such that it requires towing, rescue, on-site maintenance, or immediate removal prior to safe operation.

Substantial damage excludes damage that is limited to:

- Cracked windows;
- Dents, bends, or small puncture holes in the body;
- Broken lights or mirrors; or
- Removal from service under the vehicle's own power for minor repair or maintenance, testing, or video and event recorder download

3.3.1.4. Collisions

- Meet an injury, fatality, substantial damage, or evacuation threshold;
- Include suicides, attempted suicides, and assaults or homicides that involve contact with a transit vehicle;
- Occur at a rail grade crossing or intersection;
- Involve an individual;
- Involve a rail transit vehicle and a second rail transit vehicle; or
- Includes collisions that do not involve a transit vehicle but meet a threshold.

Certain instances of rail collisions are automatically reportable, regardless of whether they meet other reporting thresholds.

3.3.1.4.1. Rail Grade Crossing or Intersection Collisions

Any collision involving a rail transit vehicle occurring at a grade crossing or intersection. A grade crossing is defined as any place where a rail guideway used for transit operations is crossed at grade by a road or path, including crosswalks at stations. However, this excludes parking lot entrances or exits and driveways. You must report rail grade crossing collisions, whether or not they meet any other reporting threshold.

3.3.1.4.2. Rail Collisions with an Individual

Any collision between a rail transit vehicle and an individual, regardless of whether the event resulted in injuries. For a collision to occur, the transit vehicle must be in motion. The impact between a stopped transit vehicle and a person is reported as a fall on the Non-Major Monthly Summary form.

3.3.1.4.3. Rail Collisions with another Rail Vehicle

Any collision between a rail transit vehicle and a second rail vehicle. Rail-to-rail collisions are reportable whether or not they meet any other reporting threshold. This includes all collisions between a transit revenue train and another revenue train, a revenue train and a non-revenue rail service vehicle, or between two non-revenue rail service vehicles. Rail transit vehicles exclude hand-powered devices that are not part of a vehicle consist. Report one "Transit vehicle involved" for each revenue train and one "Other vehicle involved" for each non-revenue vehicle. Note: Collisions that do not involve any rail transit vehicles and meet a reporting threshold are reported as Non-Transit Collisions

3.3.1.5. Evacuations

A reportable evacuation is a condition that occurs when persons depart from transit vehicles or facilities for life-safety reasons.

In addition, rail modes must report all evacuations to the controlled rail right-of-way. Evacuations to the right-of-way refer to rail mode only. For example, if a bus breaks down during service, and passengers must evacuate to the sidewalk or highway shoulder lane, you would not report the event unless another threshold is met.

Causes of evacuations that constitute an imminent danger (life-safety) to passengers, employees, contractors, or other persons may include:

- Fires,
- Presence of smoke or noxious fumes,
- Hazardous material spills,
- Vehicle fuel leaks,
- A weapon was fired in a vehicle,
- Electrical hazards,
- Bomb threats,
- Suspicious items,
- Security,
- Power failure (if there is imminent danger to passengers),
- Mechanical failure (if there is imminent danger to passengers), or
- Other events (Other Safety Events).

Evacuations of vehicles or facilities are reportable even if the event is off-property. For example, if there is a called-in bomb threat, gas leak, or fire on adjacent property that causes an agency to evacuate a nearby station, then you must report the evacuation.

Self-evacuations, which occur when people vacate transit property without direction from transit personnel or another authority, are not automatically reportable.

3.3.1.6. Derailment

Both mainline and yard derailments and non-revenue vehicle derailments. You must report any derailment of a rail transit revenue vehicle or a non-revenue service vehicle. This includes both mainline and yard derailments.

If a derailment is a result of a collision, report the event as a collision and include the number of derailed vehicles on the "Rail Transit Train Involved" form. This form is used even if the vehicle was a maintenance vehicle, such as a hi-rail vehicle.)

3.3.1.7. Runaway Train

Events involving a moving runaway train with or without the operator on board. These include movement of a rail transit vehicle on the mainline, yard, or shop that is uncommon, uncontrolled, or unmanned due to an incapacitated, sleeping, or absent operator, or the failure of a rail transit vehicle's electrical, mechanical, or software system or subsystem. (Limited to revenue vehicles.)

3.3.1.8. Safety Events

Safety Events

- Collisions (incl. those involving attempted suicide, suicide, and assault/homicide)
- Fires (suppression)
- Derailments (mainline and yard), including non-revenue vehicles
- Hazardous Material Spills
- Acts of God
- Other Safety Events (events that do not fall into any of the other categories, yet meet a reporting threshold *other than* immediate transport for medical attention for **one** person)

System Security Events

- Bomb Threat/Bombing
- Chemical/Biological/Radiological/Nuclear Release
- Arson
- Sabotage
- Burglary
- Vandalism
- Hijacking
- Cyber Security Events
- Suspicious Package
- Other System Security Events (such as projectiles thrown at vehicles)

Personal Security Events

- Assault (including Assault on a Transit Worker)
- Attempted Suicide
- Suicide
- Homicide
- Motor Vehicle Theft
- Robbery
- Rape
- Larceny/Theft
- Other Personal Security Events

Safety Events for Fixed Route and Paratransit. For the safety event performance measure in these modes, the FTA uses all safety events meeting an NTD major event threshold (events

reported on the S&S-40 form). In other words, for this measure, FTA includes only major safety events and **excludes** major security events (both of which are reported to the NTD). This means Sun Metro may have to report a major security event to the NTD, but would exclude that security event when calculating your safety event performance measure.

3.3.2. System Reliability

The System Reliability measure expresses the relationship between safety and asset condition. The rate of vehicle failures in service, defined as the mean distance between major mechanical failures, is measured as revenue miles operated divided by the number of major mechanical failures. This measures how well the fleet or transit vehicles are maintained and operated.

3.3.3. Safety Performance Measures

For this PTASP, the data used to develop the performance measures were the data for the Fiscal Years 2022 & 2023. Sun Metro's Safety Performance measures are based on the previous year's data. Data acquisition is discussed in Section 5.3.2 of this document.

All performance measures and PTASP updates will be submitted to TxDOT (for Streetcar) and the MPO coordination no later than October 1st of each year. EPSC will conduct a review of its PTASP and notify TxDOT via email if the PTASP is current or requires an update. If EPSC determines the PTASP must be updated, the notification shall summarize the areas requiring an update and the anticipated date the revised PTASP will be submitted to TxDOT. The revised PTASP must be approved by EPSC no later than December 31st and submitted to TxDOT no later than January 31st, as indicated in sec 4.4 of the State Safety Oversight Program Standard dated August 2024.

3.3.4. Sun Metro Performance Table by Mode

Sun Metro Para Transit

Safety Performance Measures	2023	2024	2025*	2026
Total Vehicle Revenue Miles	1994510	2371684	2513985	2773723
Major Events				
Major Events Total	3	5	2	2
Major Events Rate	0.1504	0.2108	0.0795	0.0721
Collision Total	24	32	27	29
Collision Rate	1.2033	1.3492	1.0739	1.0455
Pedestrian Collisions Total	0	1	0	0
Pedestrian Collision Rate	0	0.0421	0	0
Vehicular Collisions Total	16	18	11	14
Vehicular Collision Rate	0.687	0.614	0.437	0.5047
Fatalities	0	0	0	0
Fatality Rate	0	0	0	0
Transit Worker Fatality Rate	0	0	0	0
Injuries	4	3	2	2
Injury Rate	5.36	3.13	2.34	2.16
Transit Worker Injury Rate				
Assaults on Transit Workers	0	0	0	0
Assaults on Transit Workers' Rate	0	0	0	0
System Reliability				

Sun Metro Fixed Route

Safety Performance Measures	2023	2024	2025*	2026
Total Vehicle Revenue Miles	5,712,826	5,589,182	4,331,322	4,331,322
Major Events				
Major Events Total	16	17	17	16
Major Events Rate	0.28	0.30	0.31	0.36
Collision Total	136	136	133	134
Collision Rate	2.38	2.43	2.42	3.09
Pedestrian Collisions Total	4	0	0	0
Pedestrian Collision Rate	0	0	0	0
Vehicular Collisions Total	103	96	141	134
Vehicular Collision Rate	1.80	1.72	1.00	3.0
Fatalities	0	1	0	0
Fatality Rate	0	0.01	0	0
Transit Worker Fatality Rate	0	0	0	0
Injuries	46	43	41	40
Injury Rate	9.23	8.33	8.2	8.0
Transit Worker Injury Rate	6.82	6.82	6.48	6.48
Assaults on Transit Workers	1	2	7	6
Assaults on Transit Workers' Rate	0	0	1.6	1.3
System Reliability	238,000	189,244	240,000	250,000

Sun Metro El Paso Streetcar

Safety Performance Measures	2023	2024	2025*	2026
Total Vehicle Revenue Miles	41,046	66,831	59,299	65,408
Major Events				
Major Events Total	1	0	0	0
Major Events Rate	0.12	0.00	0.00	0.12
Collision Total	8	26	10	10
Collision Rate	0.97	1.93	0.87	0.87
Pedestrian Collisions Total	0	0	0	0
Pedestrian Collision Rate	0.00	0.00	0.00	0.00
Vehicular Collisions Total	8	26	7	7
Vehicular Collision Rate	0.97	1.93	0.61	0.61
Fatalities	0	0	0	0
Fatality Rate	0.00	0.00	0.00	0.00
Transit Worker Fatality Rate	0	0	0	0
	0.00	0.00	0.00	0.00
Injuries	3	1	1	1
Injury Rate	11.53	3.84	0.17	0.17
Transit Worker Injury Rate	27.47	13.73	0.9	0.9
Assaults on Transit Workers	0	1	0	0
Assaults on Transit Workers' Rate	0.00	0.07	0.00	0.00
System Reliability	39,812	22,277	19,766	21,802

3.4. Sun Metro Key Staff - Accountabilities and Responsibilities

The following Key Staff positions are responsible for the implementation of Sun Metro ASP. Sun Metro **has established necessary** authorities, accountabilities, and responsibilities for the development and management of the transit agency's SMS.

Key Staff is responsible for implementing the ASP in their areas and ensuring that all their personnel understand their roles and responsibilities.

3.4.1. Sun Metro Director (Accountable Executive)

Sun Metro's Director of Mass Transit has been designated as the **Accountable Executive** must implement safety risk reduction programs that are included in the Agency Safety Plan and is responsible for directing and coordinating all activities affecting safety within Sun Metro. This individual directs and coordinates all operational personnel by establishing and monitoring program and project objectives. The Accountable Executive will oversee the development and implementation of the processes and procedures, review performance, complete required status changes and timekeeping documents, implement and monitor training, and coordinate efforts with internal Sun Metro departments. The Accountable Executive must satisfy the following functions:

- (1) The Accountable Executive is the final authority over all operations authorized to be conducted on the Sun Metro System.
- (2) Controls the financial resources required for the operations.
- (3) Controls the human resources required for the operations authorized to be conducted.
- (4) Retains ultimate responsibility for the safety performance of the operations conducted.

The accountable executive must accomplish the following:

- (1) Receive and consider all safety risk mitigations recommended by the Safety Committee, consistent with requirements in §§ 673.19(d) and 673.25(d)(6).
- (2) Ensure SMS is properly implemented and performed in all areas.
- (3) Approved and signed the safety policy.
- (4) Communicate the safety policy throughout the organization.
- (5) Regularly review the safety policy to ensure it remains relevant and
- (6) Regularly review the safety performance of the organization and direct actions necessary to address substandard safety performance

The Director of Mass Transit has full authority to speak and act on behalf of the Authority on all operations and maintenance matters, including those involving the safety of passengers, employees, and service property. It is the responsibility of the Managing Director to ensure the organization achieves the system safety goals.

The Director of Mass Transit schedules and attends meetings with the appropriate internal and external staff to exchange information, assess the safety performance of Sun Metro, discuss any safety issues, and serves as the media contact for Mode-specific safety-related inquiries. The Director of Mass Transit is responsible for the performance of all subordinate staff and for ensuring the entire staff's safety responsibilities are consistently carried out professionally and effectively.

The Director of Sun Metro and the Accountable Executive recognize the importance of targeted investments in safety-related projects to achieve the agency's Safety Performance Targets (SPTs). As part of this commitment, Sun Metro will allocate the safety set-aside from Federal Transit Administration (FTA) Urbanized Area Formula Grants (49 U.S.C. 5307) to projects in the following fiscal year that are reasonably likely to assist in meeting or exceeding established safety performance targets.

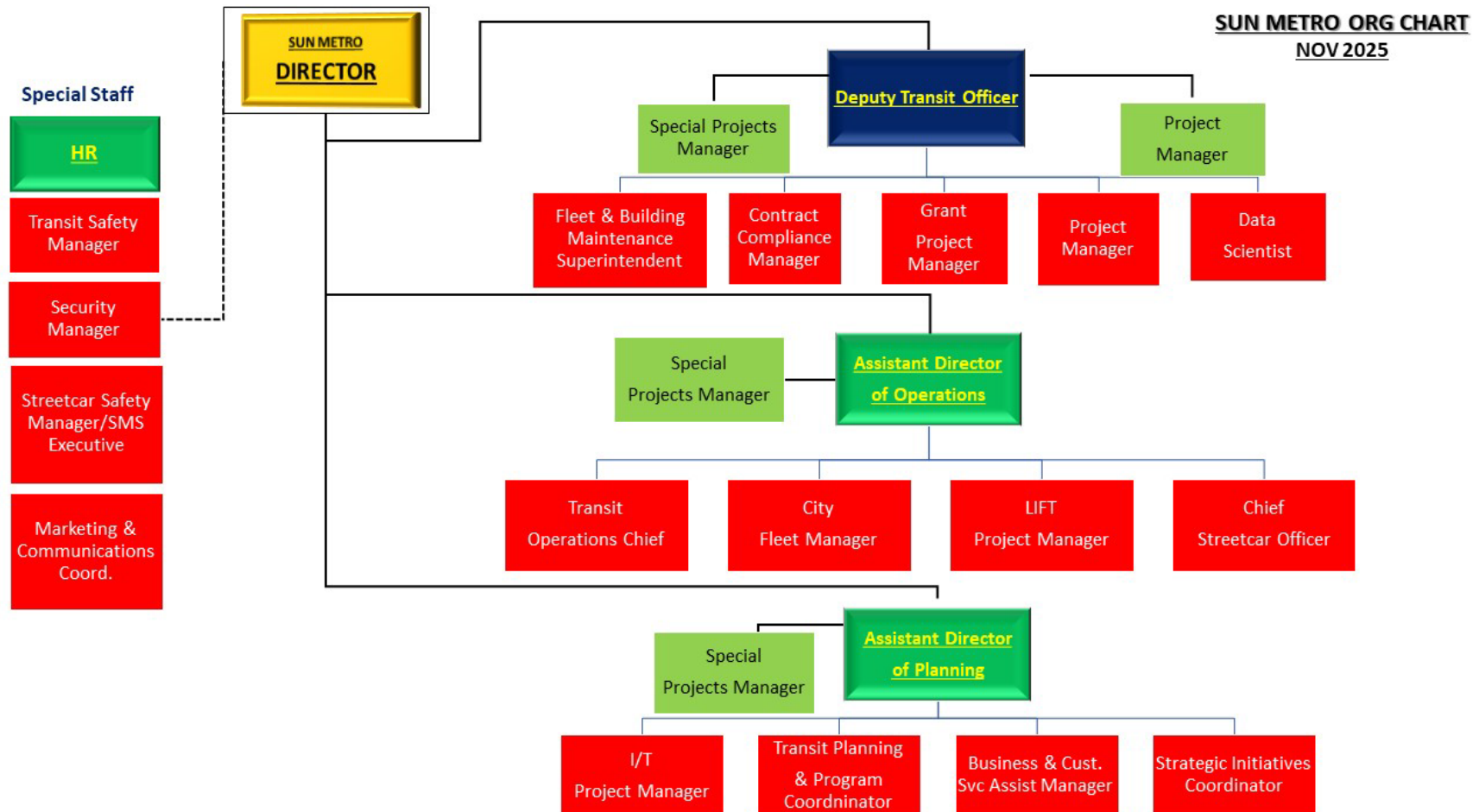
For Fiscal Year 2025, the Director of Sun Metro and the Accountable Executive will prioritize funding for safety-related projects based on:

1. **Risk Assessment Results:** Projects addressing the highest safety risks identified through the Safety Risk Management (SRM) process.
2. **Performance Impact:** Projects expected to significantly contribute to achieving or improving safety performance metrics.
3. **Eligibility Criteria:** Projects compliant with federal requirements under 49 U.S.C. 5307.

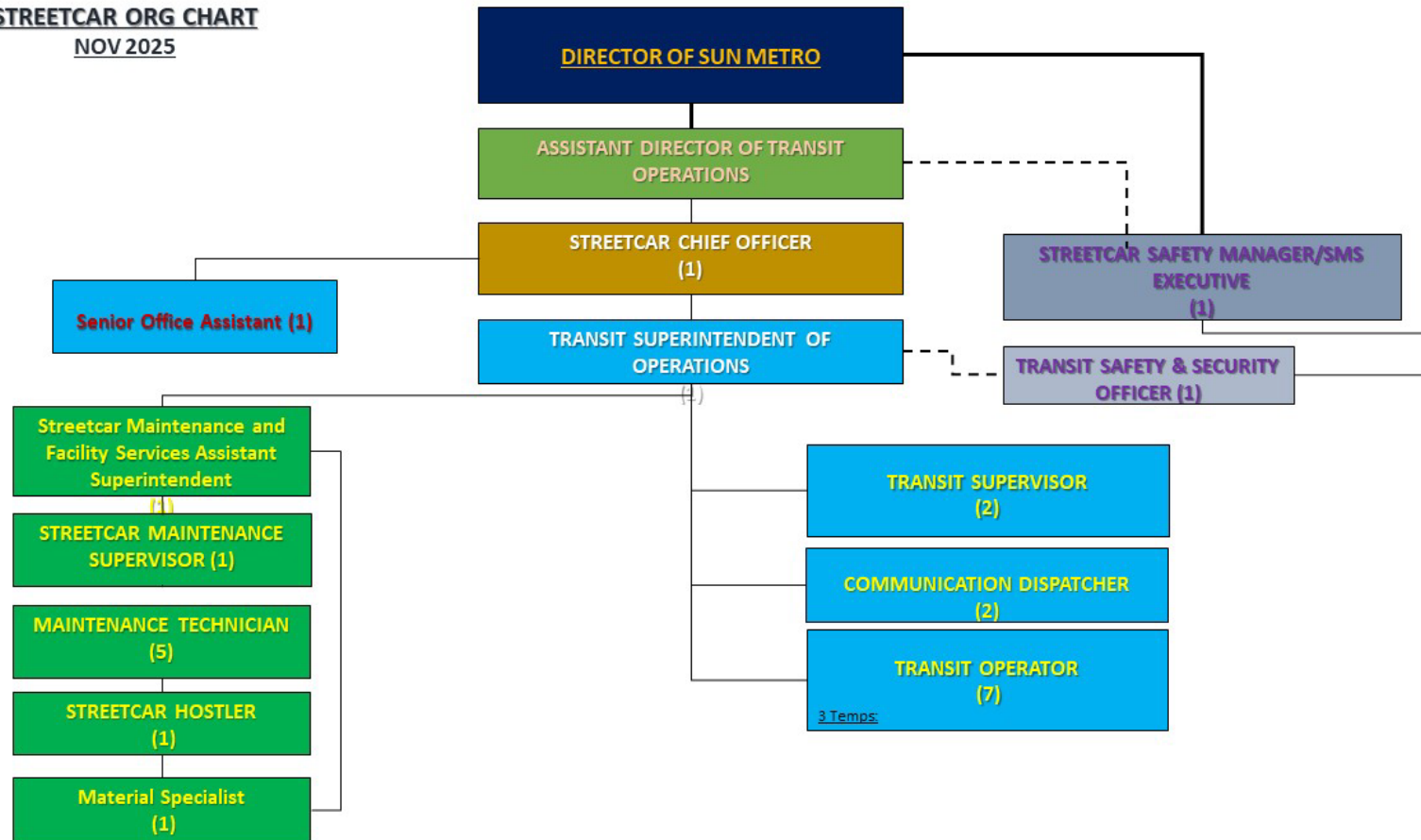
The Director of Sun Metro and the Accountable Executive will review and approve these projects during the agency's annual budget planning process, ensuring that all allocations are aligned with safety priorities and performance goals. Regular performance evaluations will determine the effectiveness of these investments and guide future resource allocation.

Sun Metro Organizational Chart

Sun Metro Safety Department



STREETCAR ORG CHART
NOV 2025



3.4.2. Transit Chief Safety Officer (CSO) or SMS Executive

The Chief Safety Officer or SMS Executive is responsible for overseeing (inspecting, auditing, and following up) the implementation of the Sun Metro Agency Safety Plan. With a direct line of communication to the Accountable Executive, this position will be responsible for the development and implementation of the Public Transit Agency Safety Plan as established in 49 CFR 673 and 674. As defined in 49 CFR 673.5, the Chief Safety Officer or SMS Executive is an adequately trained individual responsible for safety and reports directly to a transit agency's chief executive officer, general manager, president, or equivalent officer. The Chief Safety Officer or SMS Executive will not serve in other operational or maintenance capacities.

At least once every three years, TxDOT shall conduct a Triennial Audit of the EPSC/Sun Metro's implementation of its PTASP. The triennial is considered conducted as of the date TxDOT holds an audit exit debrief with the EPSC/Sun Metro. It will be at TxDOT's discretion whether the Triennial Audit will be conducted as a single onsite assessment or in an ongoing manner over the three-year cycle.

TxDOT or an authorized contractor will create audit checklists based on the RTA's PTASP and related documents. Verification of checklist items will be done through interviews, document reviews, data analysis, field observations, testing, spot checks, and demonstrations by RTA workers and contractors. The audit team will review accident reports, internal documents, safety risk management materials, SMS implementation, and corrective action plans, in line with 49 CFR Part 674 and TxDOT SSO Program Standard. Additional audits, like Drug and Alcohol Reviews and Triennial Reviews, may also be used.

Triennial Audit Process:

Planning and Coordination

- Notify RTA AE and CSO about the audit.
- Coordinate with RTA for scheduling no less than 60 calendar days before the audit schedule, finalize interviews no less than 30 calendar days before the prior to the audit, designate the audit team, and prepare audit plans, checklists, and verification methods.

Conducting the Audit

- Hold an entrance meeting, conduct interviews, review documents, observe operations, take measurements, and assess compliance.
- Provide an exit debriefing with RTA management.

Triennial Audit Report

- State the audit's purpose, evaluate PTASP implementation, identify issues, and recommend updates to the PTASP.

Final Report and Closeout

- TxDOT will issue a draft audit report within 60 days for RTA review. RTA submits comments within 30 days.
- TxDOT finalizes the report within 15 days.
- RTA submits corrective action plans (CAPs) within 30 days. TxDOT reviews and monitors CAP implementation.
- TxDOT closes the audit when all findings are addressed.

The Triennial Audit Report will include noncompliance findings, recommendations for improvement, and an analysis of the PTASP's effectiveness. Recommendations do not require CAPs.

Typical duties of the Chief Safety Officer or SMS Executive are:

- Directing/overseeing the safety program both on-site and on-road in coordination with Homeland Security, State, and Local Law Enforcement
- Serve as the point of contact between the SSOA and the City of El Paso
- Coordinate the development and implementation of Sun Metro's Agency Safety Plan
- Review and update the Agency Safety Plan under 674
- Monitor hazards reported in Sun Metro through the mechanism discussed in Sun Metro's ASP
- Track reported hazards and how they are being mitigated
- Monitoring the effectiveness of the mitigations already implemented for effectiveness/
- Monitor the different logs listed below

- I. Hazard
- II. Corrective Action Plan
- III. Safety Events
- IV. Unusual
- V. Blockage

The CSO must accomplish the following:

- I. Ensure SMS is properly implemented and performed in all areas.
- II. Develop a safety policy.
- III. Communicate the safety policy throughout the organization.
- IV. Regularly review the safety policy to ensure it remains relevant and
- V. Regularly review the safety performance of the organization and direct actions necessary to address substandard safety performance

3.4.3. Streetcar Safety Manager (SSM)

EPSC Safety and Security compliance falls under the responsibility of the Streetcar Safety (SSM) Manager. The position of Streetcar Safety Manager is designated as the CSO / SMS Executive for Sun Metro. This is to include carrying out duties and tasks that are assigned to the CSO / SMS Executive. The SSM verifies and assesses the daily operations of EPSC. This position is based at the EPSC Maintenance & Storage Facility (MSF). From this location, the SSM can monitor the safety of the system.

The SSM has the authority to stop any work or operation if it represents an imminent hazard.

The SSM Manager's duties include:

- Assists in event investigation,
- Performs investigation of security breaches,
- Conducts random inspections,
- Performs annual safety audits,
- Manages hazard analysis,
- Provides safety & security training,
- Conducts threat and vulnerability assessments, and
- Responsible for all System Safety regulatory reporting requirements.
- Ensure SMS is properly implemented and performed in the El Paso Streetcar.
- Develop the safety policy for El Paso Streetcar.
- Communicate the safety policy throughout the El Paso Streetcar.
- Regularly review the safety policy to ensure it remains relevant and
- Regularly review the safety performance of El Paso Streetcar and direct actions necessary to address substandard safety performance.

The SSM responsibilities in the day-to-day activities may include, but are not limited to:

- Directing/overseeing the overall safety operations of job sites and onboard systems that include reporting and conducting safety meetings.
- Directing/overseeing the development and implementation of training programs (i.e., new streetcar operator, safety policy courses, passenger/assistance service sensitivity classes, etc.)
- Directing/overseeing the security program for all facilities (including on-road), remote surveillance, and onboard camera systems
- Training staff
- Developing and monitoring the contents of classroom training to ensure compliance
- Investigate Safety Events, hazardous conditions, and work-related injuries, including event reports, event files, and event register, and follow up with the claims office and adjusters as needed.
- Planning, scheduling, and conducting monthly safety meetings based on Sun Metro safety and security training goals and objectives
- Setting up regular safety event review committees to determine the preventability of an event.

- Addressing employee safety complaints.
- Developing and maintaining the Operational Hazard Analysis Log
- Assisting the Chief Safety Officer or SMS Executive with Corrective Action Plans (CAPs) implementation and follow-up.

3.4.4. Transit Safety Manager (Fixed-Route)

The Transit Safety Manager verifies and assesses the daily operations of Sun Metro Bus operations (Fixed Route). This position is based at the Sun Metro Transit Operation Center (TOC). From this location, the Transit Safety Manager can monitor the safety of the system. The Transit Safety Manager manages the activities of the division and establishes policies and procedures.

The Transit Safety Manager has the authority to stop any work or operation if it represents an imminent hazard. This position is responsible for:

- Departmental compliance with federal, state, and City safety ordinances, laws, and administration safety policies and procedures.
- Planning and conducting research, and preparing technical transit safety research and analysis.
- Evaluating findings, identifying significant issues, determining options, and developing recommendations on complex transit safety projects.
- Evaluating project compliance with safety requirements.
- Managing claim litigation and coordination of Safety Events involving transit personnel and/or property. Draft, review, and recommend revisions to departmental insurance policies. Write specifications for insurance quotations.
- Overseeing the cost of insurance, events, and claim settlements to initiate cost containment programs and prepare management reports outlining cost reduction strategies.
- Overseeing safety training classes and safety meetings of subordinate personnel.
- Managing environmental compliance activities.
- Overseeing compliance activities related to environmental protection.
- Recommending corrective actions related to environmental protection.
- In coordination with the CSO direct federal safety audits and respond to external agencies' audit findings. Complete and submit safety reports to regulatory agencies.
- With the support of the CSO, serve as a liaison with federal, state, and city agencies and departments.
- Perform preliminary assessments, such as identifying environmental conditions.
- Overseeing and coordinating environmental assessments performed by outside consultants.
- Reviewing environmental impact statements completed by consultants. Evaluate project compliance with environmental requirements.
- Represent the City at various meetings, conferences, and formal proceedings and interact with a wide range of officials, regulatory agencies, civic and professional organizations, the media, department directors, coworkers, and the public.
- Testifying in formal proceedings regarding insurance-related matters, subrogation, litigation, and safety event/injury investigation.

- Conducting presentations pertaining to the status of operational plans to elected officials, steering and policy advisory committees, civic and business groups, and the public.
- Serving as a technical adviser to contractors and City officials.
- Advising higher-level supervisors in a timely manner of situations or issues that have or could lead to deviation from expected results, and recommending appropriate solutions or options.
- Performing division general and fiscal administration and miscellaneous professional and managerial functions as required.
- Involves:
 - Participate in setting performance goals and priorities that contribute to the departmental mission.
 - Monitor and approve an allocation of operational expenses for the area of responsibility.
 - With the support of the CSO/SMS Executive, prepare recommendations and justify division programs and capital funding to assist in the preparation of the department's budget and control expenditures.
 - Plan, develop, implement, and administer components of the information system to establish and maintain timely and accurate reporting and recording pertaining to functions managed.
 - Perform duties of a higher-level supervisor, peers, or subordinates to ensure continuity of operations.
 - Ride transit vehicles as a passenger periodically to observe operations. Oversee preparation of activity reports.
- Supervising assigned personnel.
- Scheduling, assigning, and checking work.
- Conducting employee performance appraisals and review evaluations by subordinate supervisors.
- Provide training and development.
- Enforce personnel rules and regulations and work behavior standards firmly and impartially.
- Meeting with staff on a regularly scheduled basis.
- Counseling, motivating staff, and maintaining harmony.
- Interviewing applicants.
- Recommending hiring, termination, transfers, discipline, merit pay, or other employee status changes.

3.4.5 Sun Metro Assistant Director of Transit Operations

Sun Metro Assistant Director of Transit Operations, please refer to the Sun Metro Organizational chart.

Typical Duties are:

- Plan, organize, and oversee daily operational activities. Involves:
 1. Manage the division to include fixed routes, rapid transit (BRIO), and dispatch operations.

2. Participate in the development and implementation of transit operations policies, goals, and standards to provide safe, reliable, cost-effective, and customer-friendly bus service.
 3. Direct all aspects of transit operations, including ridership, on-time performance, quality of service, and fare collection.
 4. Make recommendations and resolve sensitive and controversial operations issues, including customer complaints when necessary.
 5. Coordinate with other department divisions to ensure appropriate resources are available for all operations.
Prepare correspondence regarding department operations, policies, and procedures.
- Direct administrative and procedural studies of transit operations and maintenance to review cost-effectiveness and recommend service improvements. Involves:
 1. Research and analyze operational statistics. Prepare divisional budgets and monitor and control budgets.
 2. Direct operational programs such as Training and Development, and Expansion of Service Methods and Area.
 3. Oversee the Transit Facility and Fleet Maintenance program to include fueling and inventory control methods.
 4. Provide technical expertise in support of vehicle acquisitions, including specification preparation.
 5. Maintain awareness of current Federal Transit Administration (FTA) regulations and federal, state, and local legislation pertaining to transit operations, including drug and alcohol testing regulations and accessibility requirements.
 6. Adjust procedures as necessary to maintain compliance.
 7. Participate in audits or federal grant regulatory compliance and development of cost allocation plans.
 8. Substitute for department head and other division heads during absences, if delegated, to maintain continuity of services and operations. Represent the department at committee meetings such as the Citizen Advisory Committee and Mass Transit Board, communicate with ridership, the media, and citizen groups, and while at transit industry events.
 - Oversee and manage fixed-route transit service and systems planning, scheduling, data collection, and service analysis activities. Involves:
 1. Develop operational service planning studies.
 2. Analyze performance data and key performance indicators.
 3. Coordinate programs related to bus stops, shelters, and transit centers. Identify transit service needs, prioritize improvements, and determine resources required for implementing modified or new service(s).
 4. Oversee analysis and scheduling of major service changes and communicate changes to the affected public.
 5. Oversee the route shift-bidding process.

6. Oversee management of system performance measurement, route evaluation, and bus stop inventory database.
 7. Evaluate trip planning, ridership, route efficiency, and accessibility.
 8. Oversee the retrieval of manual and automated passenger counts and on-time performance data, so it may be reported to the Federal Transit Administration (FTA).
 9. Coordinate with the Fixed Route Operation division and other departmental staff to implement service delivery plans and other programs such as the Automated Vehicle Locator (AVL).
 10. Coordinate service for general and special event operations that include Fixed Route and Streetcar Operations.
 11. Analyze and evaluate division operations to assess long and short-range transit planning for strategies, resources, and needs.
 12. Coordinate with other city departments and entities such as the Texas Department of Transportation (TXDOT) and Metropolitan Planning Organization (MPO) on long-range or regional transit planning and development projects.
- Supervise assigned staff. Involves:
 1. Schedule, assign, instruct, guide, and check work.
 2. Appraise employee performance and review performance appraisals completed by subordinate supervisors.
 3. Provide training and development.
 4. Enforce personnel rules and regulations and work behavior standards firmly and impartially.
 5. Counsel, motivate, and maintain harmony. Interview applicants.
 6. Recommend hiring, discipline, merit pay, or other employee status changes.

3.4.6 Chief Streetcar Officer

The Chief Streetcar Officer **Monitors and oversees** the management of Sun Metro's Streetcar system. As a Sun Metro employee, this managerial position reports to the Director of Mass Transit. The position directs and manages all staff and contractors to ensure compliance with established Sun Metro's system policies, directives, regulations, and ordinances (city, state, and federal) and both the Standard Operating Procedures (SOP) and Standard Maintenance Procedures (SMP) in all phases of operation and maintenance. Under general direction, oversee, direct, and manage streetcar operations and streetcar maintenance, and facility functions.

Among the duties are:

- Plan and organize the development of streetcar operations. Involves: Analyze and evaluate division operations to assess the Streetcar program and project objectives to determine strategies, resources, and needs.
- Develop short and long-range plans. Involves: Monitor trends, establish benchmarks, and implement modifications and improvements. Ensure compliance with all federal, state, local, and agency requirements set forth by the Federal Transit Administration (FTA).
- Establish goals and performance objectives for staff availability and performance. Involves: Maintain reliable and high-quality streetcar service by ensuring appropriate scheduling of

personnel and training. Monitor ridership trends and analyze data. Recommend and monitor completion of service upgrades and modifications, monitor workflow, and monitor expenditures.

- Direct and control the streetcar maintenance and facility, and oversee streetcar maintenance and repair of rail equipment, including vehicles, track, and stations. Oversee inventory control methods. Ensure compliance with equipment manufacturer specifications, coordinate operational requirements with maintenance staff, and report equipment failures.
- Participate in new operational design, coordinate activities internally with outside vendors and contractors, and manage and participate in configuration control programs. Prepare, monitor, and control divisional budget.
- Supervise assigned professional, supervisory, and administrative support personnel. Involves: Schedule, assign, instruct, guide, and check work. Appraise employee performance and review evaluations by subordinates.
- Provide for training and development; enforce personnel rules and regulations, and work behavior standards firmly and impartially. Counsel, motivate, and maintain harmony. Interview applicants. Recommend hiring, termination, transfers, discipline, merit pay, or other employee status changes.

3.4.7 Streetcar Superintendent of Operations

The Streetcar Superintendent of Operations position is located at the MSF facility. This position oversees and manages the streetcar revenue operations. The tasks that are to be carried out by the SSO are listed, but are not limited to below:

- Assists in planning, organizing, coordinating, and directing streetcar operations through subordinate supervisors to ensure timely, efficient, and safe customer service. Involves:
 1. Provide guidance and direction to subordinate supervisors in route and shift coverage to ensure timeliness of service, customer satisfaction, and compliance with safety requirements set forth by Federal Transit Administration (FTA) regulations and motor carrier requirements. Monitor daily operations, meet with route supervisors on service-related issues such as road closures or special assignments, and maintain and analyze complaint files for service improvement.
 2. Issue written or oral instructions to transit supervisors and dispatchers. Monitor overtime and other operating expenses.
 3. Oversee and monitor the streetcar to ensure sufficient staffing to facilitate the orderly movement of passengers.
- Investigate and respond to complaints from public officials, other departments, or the general public. Involves:
 1. Provide accurate information to inquiries, and respond to complaints, including complaints from individuals who may be irate. Ensure that safety events or complaints are properly investigated.
 2. Represent the City in administrative hearings. Interact with other departments, supervisors, co-workers, and the public.
- Supervise assigned personnel. Involves:

1. Assign, schedule, and monitor work.
 2. Appraise employee performance and review subordinates' appraisals.
 3. Provide training and development.
 4. Counsel, motivate, and maintain supervisor-subordinate harmony.
 5. Identify and resolve staff differences, conflicts, and deficiencies. Investigate grievances, take statements, and make recommendations. Interview applicants.
 6. Recommend hiring, discipline, termination, merit pay, or other employee status changes.
 7. Enforce personnel rules and regulations, and work behavior standards firmly and impartially.
 8. Monitor and ensure equitable distribution of overtime.
 9. Promote the observation of safe work practices.
 10. Monitor sick leave abuse and oversee vacation sign-up.
- Perform related managerial or supervisory duties as required. Involves:
 1. Perform duties of the immediate supervisor or subordinates to ensure continuity of operations.
 2. Respond to major events or emergencies to ensure proper investigation.
 3. Attend meetings to represent the department, such as the Sun Metro's Citizens' Advisory Committee, or Workers' Compensation hearings.
 - Supervise assigned personnel. Involves:
 1. Schedule, assign, and check work.
 2. Appraise employee performance and review evaluations by subordinate supervisors.
 3. Provide for training and development.
 4. Enforce personnel rules and regulations and work behavior standards firmly and impartially.
 5. Counsel, motivate, and maintain harmony. Interview applicants.
 6. Recommend hiring, termination, transfers, discipline, and merit pay or other employee status changes.

3.4.8 Transit Superintendent of Fixed Route Operations

The Transit Superintendent of Operations position is located at the TOC facility. This position oversees and manages the fixed-route operations. The tasks that are to be carried out by the TSO are listed, but are not limited to below:

- Assists in planning, organizing, coordinating, and directing transit fixed route operations through subordinate supervisors to ensure timely, efficient, and safe customer service. Involves:
 1. Provide guidance and direction to subordinate supervisors in route and shift coverage to ensure timeliness of service, customer satisfaction, and compliance with safety requirements set forth by Federal Transit Administration (FTA) regulations and motor carrier requirements. Monitor daily operations, meet with route supervisors on service-related issues such as road closures or special assignments, and maintain and analyze complaint files for service improvement.

2. Issue written or oral instructions to transit supervisors and dispatchers. Monitor overtime and other operating expenses.
 3. Oversee and monitor fixed routes to ensure sufficient staffing to facilitate the orderly movement of passengers.
- Investigate and respond to complaints from public officials, other departments, or the general public. Involves:
 1. Provide accurate information to inquiries, and respond to complaints, including complaints from individuals who may be irate. Ensure that safety events or complaints are properly investigated.
 2. Represent the City in administrative hearings. Interact with other departments, supervisors, co-workers, and the public.
 - Supervise assigned personnel. Involves:
 1. Assign, schedule, and monitor work.
 2. Appraise employee performance and review subordinates' appraisals.
 3. Provide training and development.
 4. Counsel, motivate, and maintain supervisor-subordinate harmony.
 5. Identify and resolve staff differences, conflicts, and deficiencies. Investigate grievances, take statements, and make recommendations. Interview applicants.
 6. Recommend hiring, discipline, termination, merit pay, or other employee status changes.
 7. Enforce personnel rules and regulations, and work behavior standards firmly and impartially.
 8. Monitor and ensure equitable distribution of overtime.
 9. Promote the observation of safe work practices.
 10. Monitor sick leave abuse and oversee vacation sign-up.
 - Perform related managerial or supervisory duties as required. Involves:
 1. Perform duties of the immediate supervisor or subordinates to ensure continuity of operations.
 2. Respond to major events or emergencies to ensure proper investigation.
 3. Attend meetings to represent the department, such as the Sun Metro's Citizens' Advisory Committee, or Workers' Compensation hearings.
 - Supervise assigned personnel. Involves:
 1. Schedule, assign, and check work.
 2. Appraise employee performance and review evaluations by subordinate supervisors.
 3. Provide for training and development.
 4. Enforce personnel rules and regulations and work behavior standards firmly and impartially.
 5. Counsel, motivate, and maintain harmony. Interview applicants.
 6. Recommend hiring, termination, transfers, discipline, and merit pay or other employee status changes.

3.4.9 Sun Metro Transit Assistant Superintendent of Operations

Sun Metro has three Transit Assistant Superintendent of Operations positions that are located at the TOC facility. These positions oversee and manage the fixed-route operations. The tasks that are to be carried out by the TASO are listed, but are not limited to:

- Plan, organize, and supervise the daily transit operations through subordinate employees. Involves:
 1. Monitor daily operations and provide guidance and direction to transit operators, communication dispatchers, and transit supervisors to provide superior transit service and ensure timeliness and customer satisfaction.
 2. Promote and implement compliance with safety requirements set forth by Federal Transit Administration (FTA) regulations and motor carrier requirements.
 3. Meet with transit operators, communication dispatchers, and transit supervisors daily to identify and resolve problems and allocate supervisor and dispatcher assignments. Assist with personnel-related issues such as sick leave abuse notifications, miss-outs, and issuance of written or oral instructions to transit operators, dispatchers, and transit supervisors.
 4. Evaluate and ensure compliance with safety and training requirements.
- Oversee and participate in compliance activities related to transit operations.
 1. Coordinate training and maintain records.
 2. Coordinate the transport of safety-sensitive operations employees to random drug testing sites.
 3. Monitor overtime and other operating expenses related to transit operations.
 4. Maintain statistics and generate periodic reports on services furnished.
 5. Monitor calls received and follow up with transit operator complaints or issues regarding service or units.
 6. Ensure that safety events, unsafe acts, and complaints are properly documented and reported.
 7. Monitor staffing levels and shift assignments for transit operators, dispatchers, and transit supervisors.
 8. Recommend service modifications to better accommodate customer needs.
 9. Review documentation submitted by Transit Operators, Dispatchers, and Transit Supervisors for accuracy prior to submission to the Superintendent or other divisions.
- Perform and conduct various administrative responsibilities. Involves:
 1. Identify, create, and introduce improvements to workflow, training, equipment, and other operational areas.
 2. Respond to inquiries, questions, and requests for information.
 3. Draft and provide written and oral responses.
 4. Consult with the department planning and scheduling staff on the transit operator sign-up.

5. Coordinate and execute the transit supervisor and dispatcher sign-up, transit supervisor and dispatcher coverage, transit operator vacation sign-up, transit supervisor vacation sign-up, transitional duty assignments, and other special projects.
 6. Assist the safety division in the planning and preparation of new transit operator trainee classes and transit operator trainer assignments.
 7. Assist the Superintendent in resolving problems and responding to customer service complaints, including complaints from individuals who may be irate.
 8. Attend meetings as required to provide information and respond to concerns from co-workers, other departments, and the public.
 9. Make recommendations for improvement of services.
- Perform related managerial or supervisory duties as required. Involves:
 1. Perform duties of the immediate supervisor or subordinates to ensure continuity of operations.
 2. Recall employees to work in emergencies.
 3. Assist the Superintendent with the solution of grievances.
 4. Promote the observation of safe work practices.
 - Supervise assigned personnel. Involves:
 1. Schedule, assign, and check work.
 2. Appraise employee performance and review evaluations by subordinate supervisors.
 3. Training and development.
 4. Enforce personnel rules and regulations and work behavior standards firmly and impartially. Counsel, motivate, and maintain harmony.
 5. Interview applicants, hiring, termination, transfers, discipline, merit pay, or other employee status changes.

3.4.10 Transit Safety & Security Officer

Sun Metro has five Transit Safety and Security Officers who are assigned to the Safety Division. Four reports to the Transit Safety Manager, and one report to the Streetcar Safety Manager. The TSSO's duties include, but are not limited to, the following:

1. Plan, organize, coordinate, and oversee transit-related risk management programs, including quality assurance issues or projects, workers' compensation, and safety programs.
2. Involves: Develop and implement policies, procedures, and internal controls related to compliance with health, safety, security, and environmental rules and regulations. Identify health and safety risks and recommend corrective actions to control and limit the City's liability.
3. Investigate claims of damage or injury reported by passengers, pedestrians, or other drivers.
4. Coordinate legal issues or concerns with the City Attorney's office, liability insurance adjusters, or external legal counsel and represent the City's interest in mediation, settlement negotiations, or trials.

5. Coordinate quality assurance inspections, such as post-accident and post-employee injury inspections and monitoring.
6. Oversee and participate in compliance activities related to environmental protection, such as alternative fuels, stormwater, and fuel storage, and coordinate corrective action or response to audit findings.
7. Assist the Transit Safety Manager with coordination of the federally mandated drug and alcohol testing program, including pre-employment, post-accident, reasonable suspicion, random, return to duty, and follow-up testing for safety-sensitive positions.
8. Assist with federal safety audits and complete and submit safety reports to regulatory agencies.
9. Plan, coordinate, and deliver training programs. Involves: Conducting needs assessment, program planning, development, and presentation of training and instructional materials. Monitor program effectiveness, track attendance, and prepare periodic reports. Prepare, edit, and coordinate the production of training materials or coordinate the efforts of contractual trainers.
10. Provide classroom and behind-the-wheel or pedal time training to new Transit Operators and provide retraining to current Transit Operators.
11. Provide training in areas such as defensive driving, back injury prevention, commercial driver licensing, supervisory training, hazardous materials, accessibility compliance, sexual harassment prevention, or other subjects related to transit operations to enhance performance or ensure compliance with state and federal requirements.
12. Respond to complaints from public officials, other departments, or the general public.
13. Provide accurate information to inquiries, and respond to complaints, including complaints from individuals who may be irate.
14. Ensure that safety events, unsafe acts, and complaints are properly investigated. Conduct on-the-scene event investigations. Interact with other departments, supervisors, co-workers, and the public.
15. Coordinate and participate in the department's Event Review Board (ARB) committee meetings.

3.4.11 Sun Metro LIFT

Since 2012, Sun Metro has outsourced the paratransit division to MV Transportation, a national third-party vendor. After the initial agreement ended in 2019, MV was awarded a new 10-year contract through a competitive RFP process. The new contract states that MV is responsible for providing all staffing resources to run a turn-key operation while the City provides the operations and maintenance facility, fuel, scheduling software, and buses. The service is paid for by the performed trip and a fixed monthly fee while maintaining a set of key performance measures with corresponding incentives and disincentives. MV is then responsible for the following:

- Deliver a fully functional ADA paratransit operation as outlined in the 2019-607R contract.
- The hiring of all necessary personnel includes drivers, supervisors, dispatchers, schedulers, call center staff, mechanics, and supervisors.

- The maintenance of the facility, buses, equipment, landscaping, and bus wash.
- All operational expenses include utilities, uniforms, LIFT passenger flyers and correspondence, vehicle cellular charges, and all costs associated with running the service.
- Create, execute, and maintain a fully functional eligibility program that includes a new conditional eligibility component.
- Management of all subcontractors to ensure delivery of the highest quality and lowest cost paratransit service, and that they meet all FTA and City requirements.
- Implementation of their Safety SMS program that adheres to all FTA requirements. Sun Metro does not have its SMS program for paratransit; instead, it relies on MV's safety program, namely its "

In addition to providing MV with the facility, buses, fuel, and technology, the City will also provide a contract compliance manager who regularly reviews the performance measures and other contractual obligations.

The following are the main contractual obligations and key performance measures: **Sun Metro Standards.**

Standard	Disincentive	Expected	Incentive
In-Window On-Time	<90.0%	90-92.9%	>93%
Ride-Time Compliance*	<97%	97-98.9%	>99%
Call Center Response Time * (Calls answered within 2 mins)	<90%	90-92.9%	>93%
Complaints per 10K trips *	>=13	10-12.9	<10
Customer Satisfaction Rating*	<4.0	4.0-4.5	>4.5
Miles between Road Calls	<75K	75K-90K	>90K
Preventative Maintenance	<98%	99-99.9%	100%
Safety (Collisions)	>1.3	1.0-1.3	<1.0
Passenger Safety Events/10K trips*	>1.0	.6 - .9	<.6

Sun Metro LIFT Safety SMS Program

MV provides a Safety and Operations Manager who manages the paratransit safety program in compliance with State and Federal regulations and Corporate and Client policies. This position ensures:

- All operators are current with company and contractor training requirements.
- All operators are adequately certified, and certification records and files are kept up to date.
- All employees are current with the training required for general safety programs and practices.
- The local facility is operated in compliance with OSHA and EPA regulations.
- All new hire candidates meet minimum general qualifications and receive all required training prior to being placed into revenue service.

- Liability and Worker's Compensation Claims are handled appropriately, promptly, and in conjunction with contractor staff and resources.
- The Drug and Alcohol Testing program is implemented and complies with Federal and TxDOT regulations as specified in 49 CFR Part 655.
- Employee turnover is minimized through initial and ongoing training aimed at improving operator skill levels, as well as through a complete and appropriate screening process.
- Consistent reductions in preventable and non-preventable vehicle and non-vehicle safety events.
- Dynamic and appropriate ongoing training programs for all operators.
- Safety Incentives and programs are managed effectively and consistently. A consistent Safety Culture throughout the location incorporates operations, safety, and maintenance departments and emphasizes the team approach and individual responsibility of all employees to achieve the common goal.
- Successful completion of all related audits, including those conducted by MV, City, FTA, or external auditors.
- Recruit and screen potential new hire operator candidates to be placed into training, ensuring that efforts meet the staffing needs of the project.
- New hire and veteran operator training programs are managed to ensure all operators receive the minimum initial training and all employees receive required annual and ongoing training.
- Community outreach is implemented to identify potential new hire candidates as well as the most appropriate recruiting sources.
- Provide and/or manage the classroom and behind-the-wheel instruction in all aspects of vehicle operation in the course of passenger transportation, including defensive driving, service area familiarization, passenger loading, unloading, and securement, proper manifest documentation, use of on-board equipment, safety events, emergency procedures, dispatch and radio communications, and passenger sensitivity.
- Provide and/or manage monthly or annual ongoing/refresher training in topics relevant to the service and service area in a timely manner.
- Respond to and/or provide for trained staff response to operator Safety Events, ensuring appropriate collection of information, documentation of events, and reporting per MV's internal policy. Review all vehicular, passenger, and employee Safety Events for determination of cause and preventability, identifying potential trends to be addressed in future training efforts, as well as ensuring retraining and safety points are assessed according to MV's policy.
- Manage all aspects of the Drug and Alcohol Testing program, including pre-employment, random, and post-accident testing requirements. Conduct regular reviews of local testing facilities, ensuring compliance with City, MV corporate, and federal policy.
- Establish functional Safety Committees of operators and staff to review safety concerns and make recommendations to management for potential additional safety efforts.
- Assist operations and maintenance departments in identifying additional or refresher training needs based on current trends within the employee base.

Work with City & MV corporate claims staff to ensure all liability and workers' compensation claims are handled promptly and effectively in an effort to reduce financial liability as well as recoup all claims that can be subrogated.

- Proactively manage all employee injury claims to minimize lost time and modified duty claims. Work with local medical facilities to ensure injured employees are returned to full-duty status promptly.
- Conduct regular audits of employee training files, vehicle maintenance files, and facility safety audits, ensuring compliance with OSHA and EPA regulations and related MV corporate policies.
- Ensure operator performance reviews, ride-a-longs, road checks, and evaluations are conducted according to local policies and MV corporate policy and requirements. Provide feedback and follow-up for operator performance reviews and identify individual training needs where necessary.
- Ensure all project training materials are current, necessary supplies are available, and inventories are secured and kept up to date.
- Provide regular reports to local and MV corporate management staff of safety department efforts, claims status, training efforts, event history, workers' compensation claims status, and other required information.

3.5 Employee Safety Reporting

Safety reporting is an essential part of SMS. Sun Metro must foster an atmosphere of trust that encourages and rewards employees for providing safety-essential information to Senior Management, even if it is self-incriminating, without fear of reprisal. Reports and concerns are communicated to management & Senior Management, so they are assessed and mitigated. If required, the hazard or concern could be elevated to upper management for additional actions.

As we know, self-reporting is a process that, if what happened was a real mistake, the focus will be on re-education and not on punitive action.

There are many ways employees can report safety conditions:

- Report conditions directly to the dispatcher, who will add them to the Transit Master Operation Event Report.
- Report conditions anonymously via a locked comment box in the driver area.
- Report conditions using their name or anonymously to hazard@elpasotexas.gov
- Report conditions directly to any supervisor, manager, or director.

CSO discusses actions taken to address reported safety conditions during the quarterly SSRC Meetings. Additionally, if the reporting employee provided his or her name during the reporting process, the CSO or designee follows up directly with the employee when Sun Metro determines whether or not to take any action, and after any mitigations are implemented.

Hazards reported by employees are reported to the CSO and the Mode Safety Manager. The Mode Safety Manager is responsible for directly addressing the reported hazard. The CSO will provide support and track the management of the reported hazard. The CSO will report to upper management on how the hazards reported are managed.

An effective SMS empowers employees with the confidence to raise concerns that may lead to serious safety/quality concerns and assures them that someone will listen to them and investigate their issues or concerns in a professional manner — all without fear that they will face unduly harsh penalties for admitting to genuine mistakes.

A robust employee safety reporting system will provide:

- Unique – Information you can't get any other way
- Authentic – Individuals who know best are directly providing the information
- Timely – Direct reporting overcomes the time lag of mandatory reporting processes
- Diverse Information from different individuals with different experiences and perspectives
- Comprehensive – Multiple reports over time reveal patterns, trends, and the scope of an issue

The Sun Metro will implement an Employee Self-Reporting program that will:

- Encourage employees to report any safety-related situation
- Emphasize benefits for safety, not safety record
- Establishes clear guidelines for unacceptable behavior
- Balance learning and accountability
- Establishes several methods for employees to report safety issues.

The following table presents a guideline for cases of safety events:

Human Error	At-Risk Behavior	Reckless Behavior
An inadvertent action – slip, lapse, mistake	A choice – risk not recognized or believed justified	Conscious disregard of unreasonable risk
Manage through: ➤ Processes & procedures ➤ Checklists ➤ Training ➤ Design	Manage through: ➤ Increase situational awareness ➤ Remove at-risk behavior ➤ Encourage safe behavior	Manage through: ➤ Remedial action ➤ Punitive action

Employees are expected to tell others when witnessing unsafe work practices or conditions. When employees are not comfortable discussing these unsafe conditions with fellow employees, they are encouraged to discuss the situation with management or report it in writing.

What is important to emphasize is that any cultural change in the organization will take time (months to years) to be fully implemented and see the results of these changes.

3.5.7 Disciplinary Policy

To ensure a culture of open reporting in Sun Metro, in the majority of the cases, no disciplinary action will be taken against any employee who **reports** a safety hazard or concern using the proper channels provided by Sun Metro and the City of El Paso. If the reporting of the hazard or

concern indicates, beyond any reasonable doubt, an illegal act, gross negligence, or a deliberate/willful disregard for Sun Metro or City of El Paso rules and regulations, the employee will be subject to disciplinary actions.

The Sun Metro Rules and Regulation Manual will serve as the guidelines for the implementation of disciplinary actions regarding Events. The Human Resources Department of Sun Metro will be responsible for interpreting and determining any disciplinary action if necessary.

3.5.8 Employee Reporting Methods

If a Sun Metro employee is involved in a near miss or determines something they deem to be a hazard, Sun Metro and its contractors ask for their help in reporting the event so we all may learn the lessons from it and perhaps prevent a collision or injury from occurring in the future.

- Near miss: An event you witnessed where no harm was caused, but there was the potential to cause injury or ill health; a dangerous occurrence.
- Hazard: Anything that may cause harm in the near future.

If an employee is involved in a near miss or determines something they deem to be a hazard, we ask for their help in reporting the event so we all may learn the lessons from it and perhaps prevent a collision or injury from occurring in the future.

If the safety or security hazard requires immediate attention, dispatch is notified immediately. If immediate attention is not required, the employee is encouraged to submit the information to management by the end of their workday. Our managers then initiate conversations with employees about their observations of both safe and unsafe behaviors.

The employee's contribution to the cause of the injury or collision is considered in disciplinary action, up to and including termination. If, after analysis, it has been determined that the safety event resulted from an overt decision, disciplinary action is indicated. If not, then the appropriate counseling and/or training is indicated.

The following methods will be used by Sun Metro to allow employees to report hazards or near misses. The methods are:

1. **Reporting boxes:** Using a Near/Hazard Notification form, the employee can fill out the form and deposit it in the reporting boxes that will be located at strategic locations on Sun Metro facilities. The locations will be selected in a way that the employees feel comfortable using this method. Each mode will develop a Standard Operating Procedure.
2. **Open-door policy:** Each safety manager, CSO/SMS Executive, and Accountable Executive has an open-door policy where the employee is encouraged to contact their corresponding manager to report any hazard or safety situation in their work area.

Refer to section 6.2 Safety Communication for more details on Sun Metro's Communication process.

3. **Hazard Reporting QR Code**



Safety Management System (SMS)

What is my role in our SMS?

- Work safely and wear PPE
- Be compliant with procedures and regulations
- Report safety hazards, concerns, or suggestions

What can I report?

- Hazards or potential hazards
- Accident and/or incidents
- Possible solutions and safety improvements
- Close calls and/or near misses

Please email your concerns to
sm-hazards@elpasotexas.gov
 or use the QR code on the back.

Safety Reporting Options:

- Notify your Supervisor/Lead or local
- Safety Representative
- Email sm-hazards@elpasotexas.gov
- Formally submit a confidential report

Personal Safety Accountabilities:

- I am accountable for my own safety and file safety of those around me
- I follow procedures, wear PPE, and promptly report safety hazards
- I must report injuries and damages
- My goal: **BE SAFE AT WORK AND AT HOME**

Unacceptable Workplace Behaviors:

- Willful safety violations
- Reckless and negligent acts
- Criminal activities
- Alcohol or drug use

Point your camera at the QR code.
 Wait for code to scan,
 and then open.



4. Promotional E-mail for Reporting Hazards



3.6 Safety Management Policy Communication

Each safety manager is responsible for communicating the safety policies established in this PTASP to their employees. The Safety Manager must communicate the safety policy within 30 days after the PTASP has been approved by the Mass Transit Board.

The Safety Manager can use any or all of the methods listed below to communicate the Safety Policy:

- **E-mail** – sm-hazards@elpasotexas.com: A safety hazard reporting email provides a streamlined, confidential, and accountable channel for reporting potential hazards. It facilitates efficient communication, enables timely responses, ensures documentation, and contributes significantly to the overall effectiveness of a Safety Management System.
- **Hazard Reporting QR Code**: Providing a QR Code address specifically dedicated to safety hazard reporting makes it convenient for employees to report safety concerns. It offers a simple, direct, and accessible way to communicate potential hazards.
- **Safety Bulletins**: Safety bulletins are essential components of a Safety Management System. They ensure consistent communication, promote awareness, facilitate rapid responses to emerging risks, enhance employee education, and contribute significantly to the development of a robust safety culture within an organization.
- **Toolbox meetings**: Regular safety Toolbox Meetings demonstrate the organization's commitment to safety. A proactive approach to communication creates a positive safety culture, encouraging employees to actively participate in maintaining a safe work environment.
- **General notices**: The General notices can swiftly address emerging safety concerns or industry updates. Rapid dissemination of this information allows the organization to respond promptly, implementing necessary changes or precautions to mitigate risks.
- **Formal classroom training**: Training can serve as an educational tool, providing employees with valuable information on new safety equipment, procedures, or regulations. Regular training through formal classroom training ensures that employees are continuously learning and staying up-to-date with industry standards.

Specific to Rail, the additional methods are also used to communicate the Safety Policy:

- A USB drive will be issued to all of the Streetcar employees with all the necessary information, including the SOPs, SMP's PTASP.
- A monitor dedicated to the safety department, displaying any relevant Safety Management Policies

These additional methods will ensure that the Safety Management Policies are readily accessible to everyone in the organization.

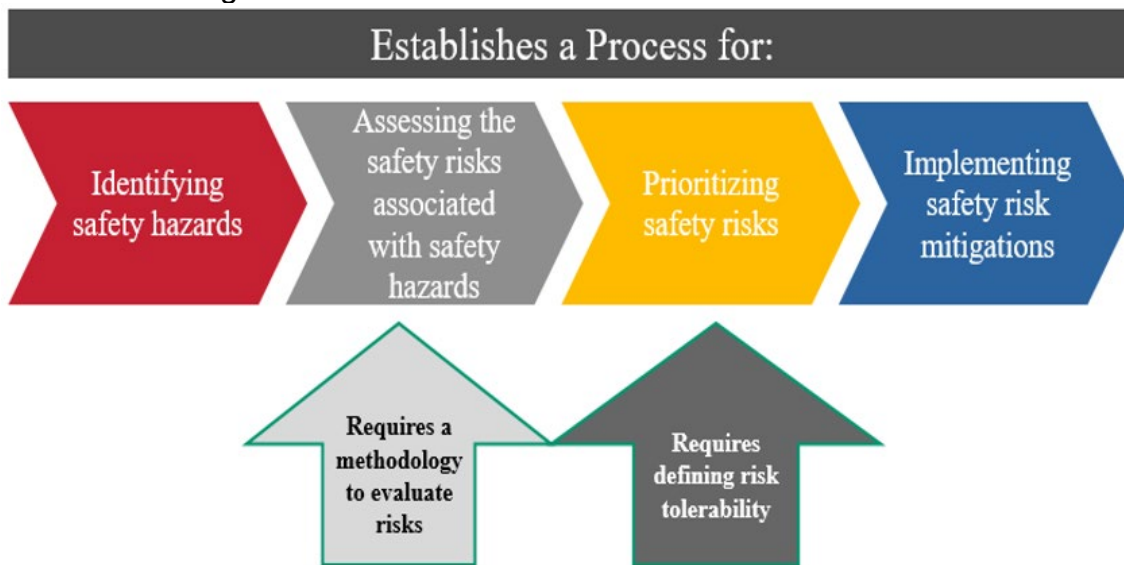
The safety manager is responsible for documenting in writing which method was used and that all employees were formally notified and acknowledged that they received the information.

4 Safety Risk Management (49 CFR 673.25)

4.1 Safety Risk Management Overview

The objective of this section is to establish a process to manage hazardous conditions that exist across **all transit modes** operated by Sun Metro. Sun Metro's Safety Risk Management (SRM) process evaluates hazards associated with roadway work and track access activities. Under 49 CFR 673.25 and 49 CFR 671. The process will identify hazards, assess the hazards, develop corrective actions to mitigate or eliminate the hazards, and assess the success of the corrective actions in eliminating or minimizing to an acceptable risk status through the mitigations. Refer to Sun Metro SOP 600.1 Hazard Management and Assessment.

Refer to the diagram below:



Sun Metro defines a hazard as 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 the public transportation system; or damage to the environment.

The Chief Safety Officer or SMS Executive and the Safety Manager of each mode are directly responsible for the implementation and ongoing management of Sun Metro's Hazard Management process. This includes:

1. Developing, updating, and auditing the program
2. Training all designated Sun Metro employees and contractors on the hazard management process
3. Documenting and tracking all identified hazards to resolution.

The hazard resolution process is from 'cradle to grave' and can be applied throughout the 5 phases of the system life cycle.

1. Planning
2. Design
3. Construction
4. Operations

5. Decommissioning

Hazard analysis attempts to determine the set of primary events in the hazard generation process. Upon identification of these events, Sun Metro will undertake measures to mitigate, control, or eliminate the generation of hazards in ways that can reduce their risk to an acceptable level. Hazard resolution is the corrective action taken in response to the hazard identification and assessment process, but time and resource restrictions may determine the level of resolution that can be accomplished.

The following are actions for hazard resolution:

1. Eliminate the hazard, if possible
2. Implement training, procedural strategies, or technology approaches, as appropriate, to reduce the hazard.
3. Provide training to educate the workforce on possible hazards
4. If the hazard cannot be eliminated, reduce exposure to it
5. Monitor the Hazard mitigation to determine if the risk has been managed at an acceptable level so that it does not recur."

4.2 Safety Hazard Identification

Hazard identification encompasses a set of methodologies that first search throughout the system for anything with the potential to do harm. Identification of hazards is the responsibility of all divisions and is the key to system safety. Identified hazards are analyzed for severity, occurrence frequency, and cost feasibility of remedial action required to eliminate or reduce the hazard to the lowest practical level. The Safety Manager of each mode shall review all hazards identified and log them into the Hazard Tracking Log.

Hazards can be identified in several ways, such as:

1. Design Review
2. A, System Reliability, and Failure Reports
3. Ride Checks and Proficiency Checks
4. System Inspections, Audits, and Regulatory Inspections
5. Customer, Contractor, and Employee Complaints
6. Safety Committee
7. Transit Industry Experience
8. Federal Transit Administration
9. Texas Department of Transportation (TxDOT-SSOA)

Identify roadway worker hazards including:

- Loss of redundant protections
- Failure of RWIC communication
- Lone worker violations
- OCC authorization errors
- Roadway vehicles or trains entering work zones
- Nighttime visibility limitations
- PPE failures or improper roadway markings
- Work zone encroachment by the public

Sun Metro will use a hazard identification and analysis process before purchasing and accepting new equipment and modifications of existing facilities, systems, or rolling stock, and infrastructure elements.

By the 15th of the following month, EPSC/Sun Metro is required by TxDOT to submit a consolidated hazard log or equivalent documentation for hazards discovered during the previous month and hazards that remain open. The log must contain hazards encountered by all departments of the agency, and any source, including but not limited to, transit worker reporting program, safety officer observations, internal reviews, contractor reviews, analyses, and investigations, hazards identified from SSO personnel, passenger complaints, after-action reviews of safety events, and safety concerns identified through safety data reviews.

4.3 Safety Risk Assessment

Hazard Risk Assessment is a quantitative calculation based largely on subjective judgments used to determine the risk associated with each hazard and thus the urgency for implementing corrective measures to eliminate or reduce risk to a level of acceptability. Risk Assessment is comprised of evaluating hazard severity (categorizing the hazard) and evaluating hazard probability.

The factors considered in this analysis include system safety, schedule, and the impact on the public's perception of safety on the system in the community where the Streetcars operate.

4.3.1 Hazard Analysis

Analysis of a hazard is based on both the probability of occurrence and the severity of an event. Hazards with the greatest potential to cause serious injury are given the highest priority for immediate resolution. Hazard analysis also attempts to reduce the severity of safety events by introducing protective devices and equipment, procedures, and/or forms, or system modifications that reduce the amount of human and property damage in a safety event.

While identifying every hazard is virtually impossible, there are two methods for orderly identification of hazards: inductive and deductive analysis.

- The inductive hazard identification process consists of an analysis of system components to identify their respective failure modes and the effects they may have on the total system. This process assumes the failure of single elements or events and, through analysis, determines the potential consequential effects on the system or subsystem.
- The deductive hazard identification process involves defining an undesired effect (e.g., collision, fire) and then deducing the possible conditions or system component faults (or combinations of them) that are necessary to cause the undesired effect.

Analyze roadway work risks including:

- Worker exposure to moving trains
- Adequacy of sweep procedures

- Redundant protection integrity
- Proximity detection and communication reliability

The CSO and the Safety Manager of each mode will continually evaluate the transit operation using the methods described above to identify new hazards. This will be documented as described in this document.

For existing infrastructure elements, vehicles, procedures/processes, Sun Metro should consider using audits – either ad hoc or structured, based on identified safety issues, to identify existing hazards and hazard potentials.

The Chief Safety Officer or SMS Executive and the Safety Manager of each mode will be charged with performing the hazard analysis for that operation.

4.3.2 Hazard Severity

Hazard severity is a subjective determination. As data is accumulated over time, an objective determination applicable specifically to Sun Metro can be derived. The determination reflects a credible mishap that could be anticipated to result from human error, procedural deficiencies, design inadequacies, component failure, or malfunction. Hazard Severity at Sun Metro is based on the U.S. Department of Defense Military Standard for Systems Engineering (MIL-STD-882-E) as follows:

- Category 1, Catastrophic – Death, system loss, or severe disruption of service system-wide.
- Category 2, Critical – Severe injury, severe occupational illness, major system damage, or major system-wide disruption of service.
- Category 3, Marginal – Minor injury, minor occupational illness, minor system damage, or minor system disruption of service.
- Category 4, Negligible – Less than a minor injury, occupational illness, system damage, or less than minor system disruption of service.

The categorization of hazards is consistent with risk-based criteria for severity; it reflects the principle that not all hazards pose an equal amount of risk to personal or system safety.

If the Mode Safety Manager and/or the CSO / SMS Executive identify any Category 1 Catastrophic and Category 2 Critical hazards, specifically hazards 1A, 1B, 1C, 2A & 2B on the streetcar system, the TxDOT-SSOA will be immediately notified using “TxDOT Industry Safe” software.

The OHA and/or PHA for all transit modes in Sun Metro will be periodically updated to ensure the hazards have been mitigated, reduced, or controlled to acceptable levels. The Safety Manager of each transit mode is responsible for updating the OHA and/or PHA.

4.3.3 Hazard Probability

The probability of an event or hazard occurring may be defined as a ratio of the number of times a specific event occurs to the total number of trials in which this event may occur during the planned life expectancy of a system. Generally, hazard probability is described qualitatively in potential occurrences per unit of time, miles, trips/runs, or passengers carried. The table below identifies the probability thresholds used by the Sun Metro. A hazard probability may be derived from the analysis of transit system operating experience, evaluation of Sun Metro safety data, or historical safety data from other passenger rail systems.

Hazard Assessment Probability Levels

Hazard Probability	Probability Levels
A = Frequent	Likely to occur frequently to an individual item. Continuously experienced in the system. MTBE* is less than 1000 operating hours
B = Probable	It may occur several times in the life of an item. It may occur frequently in the system. MTBE is equal to or greater than 1000 operating hours and less than 100,000 operating hours
C = Occasional	Likely to occur sometime in the life of an item. It may occur several times in the system. MTBE is equal to or greater than 100,000 operating hours and less than 1,000,000 operating hours
D = Remote	Unlikely, but possible to occur in the lifetime of an item. Unlikely, but can be expected to occur at some time in the system. MTBE has greater than 1,000,000 operating hours and less than 100,000,000 operating hours
E = Improbable	So, unlikely to occur, it can be assumed that occurrence may not be experienced. Unlikely, but possible to occur in the system. MTBE is greater than 100,000,000 operating hours
F = Eliminated	Incapable of occurrence. This category is used when potential hazards are identified and later eliminated

* MTBE = Mean Time between Events

The Risk Assessment Process is used to prioritize hazardous conditions and focus available resources on the most serious hazards requiring immediate resolution. Sun Metro will use MIL-STD-882-E DOD Standard Practice for System Safety dated May 11, 2012, or the most current version, to assess the level of risk for each identified hazard to determine what action(s) must be taken to correct or document the hazard risk. This risk assessment system is incorporated into the formal System Safety analysis, which enables Sun Metro decision-makers to understand the amount of risk involved in accepting the hazard in relation to the cost (schedule, cost, operations) to reduce the hazard to an acceptable level.

The Risk Assessment Matrix informs the Risk Assessment Index based on potential severity and probability. The criteria for defining further actions are based on that index. Follow-up actions resulting from the Risk Assessment are as follows:

- ✓ **Unacceptable:** The hazard must be mitigated in the most expedient manner possible before normal service may resume. Interim corrective action may be required to mitigate the hazard to an acceptable level while the permanent resolution is in development.
- ✓ **Undesirable:** A hazard at this level of risk must be mitigated unless a documented decision to manage the hazard until resources are available for full mitigation is issued by executive management and forwarded to Sun Metro CSO for review and approval/disapproval.
- ✓ **Acceptable with Review:** The CSO must determine if the hazard is adequately controlled or mitigated as is.
- ✓ **Acceptable without Review:** The hazard does not need to be reviewed by management and does not require further mitigation or control.

Risk Assessment Matrix

Safety Risk Assessment Matrix					
MIL-STD-882-E		Severity			
		Catastrophic 1	Critical 2	Marginal 3	Negligible 4
Probability	A - Frequent	1A	2A	3A	4A
	B - Probable	1B	2B	3B	4B
	C - Occasional	1C	2C	3C	4C
	D - Remote	1D	2D	3D	4D
	E – Improbable	1E	2E	3E	4E
	F - Eliminated	1F	2F	3F	4F

Risk Assessment Index

1A, 1B, 1C, 2A, 2B	HIGH	Unacceptable
1D, 2C, 3A, 3B	SERIOUS	Undesirable, with a management decision required
1E, 2D, 2E, 3C, 3E, 3D, 4A, 4B	MEDIUM	Acceptable with review by management
4C, 4D, 4E	LOW	Acceptable without review
1F, 2F, 3F, 4F	NONE	Incapable of occurrence. This category is used when potential hazards are identified and later eliminated

Categories

Category	Description	Description
1	Catastrophic	Death, system loss, or severe environmental damage
2	Critical	Severe injury, severe occupational illness, major system or environmental damage
3	Marginal	Minor injury, minor occupational illness, or minor system or environmental damage
4	Negligible	Less than minor injury, occupational illness, or less than minor system or environmental damage

Probability

Level	Description	Specific Individual Item	Fleet Inventory
A	Frequent	Likely to occur frequently	Continuously experienced
B	Probable	Likely to occur several time in the life of an item	Will occur frequently
C	Occasional	Likely to occur sometime in the life of an item	Will occur several times
D	Remote	Unlikely but possible to occur in the life of an item	Unlikely but can reasonably be expected to occur
E	Improbable	So unlikely, it can be assumed occurrence may not be experienced	Unlikely to occur, but possible
F	Eliminated	Completely removed from consideration	Removed from consideration

4.4 Safety Risk Mitigation

The mitigation of hazards utilizes the results of the Risk Assessment Process. The objectives of the hazard resolution process are to:

1. Identify areas where hazard resolution requires a change in the system design, installation of safety devices, or development of special procedures.
2. Verify hazards involving interfaces between two or more systems have been resolved; and
3. Verifying the resolution of a hazard in one system does not create a new hazard in another system.

Mitigate risks by implementing controls including:

- Required positive protection (exclusive track occupancy, RWIC control, flags, derails, TIMS, OCC protection)
- Pre-job Job Safety Briefings
- Risk-based track access scheduling (daytime vs. non-revenue hours)
- Additional shielding, cones, markers, and PPE
- Specialized training for high-risk tasks

All roadway worker hazards must be included in the Sun Metro hazard log and reviewed annually.

Sun Metro uses the following methodology to ensure system safety objectives are met by eliminating or controlling hazards. These controls are implemented throughout design, construction, procurement, and operations:

1. Design out hazards or design to minimize hazard severity. To the extent permitted by cost and practicality, identified hazards are eliminated or controlled by the design of equipment, systems, and facilities.
2. Develop mitigating provisions for hazards that cannot reasonably be eliminated or controlled through design that is controlled to an acceptable level through the use of fixed, automatic, or other protective safety design features or devices. Provisions are made for the periodic performance of functional checks of safety devices and training for employees to meet system safety objectives.
3. When design, training, and safety devices cannot reasonably or effectively eliminate or control an identified hazard, safety warning devices are used (to the extent practicable) to alert persons to the hazard.
4. Where it is impossible to reasonably eliminate or adequately control a hazard through design or the use of safety and warning devices, procedures, and training are used to control the hazard. Precautionary notations are standardized for use by all persons involved, and safety-critical issues require the certification of authorized personnel.

The Initial Risk Index defines the magnitude of any specific hazard item without the implementation of design, construction, procurement, or operational measures to control or mitigate the risk. The Safety Manager by mode will identify sets of proposed mitigation actions to eliminate or control each identified risk and evaluate the Residual Risk Index. Based on those mitigating actions, to assess the potential effectiveness and inform the Sun Metro Associate Director of Streetcar Operations, a determination of whether the hazard is adequately controlled or mitigated will be made.

4.5 Roadway Worker Protection

El Paso Streetcar (EPSC) has implemented a comprehensive **Roadway Worker Protection (RWP) Program** designed to protect all personnel who perform inspection, construction, maintenance, or other work activities on or near the streetcar guideway. The **EPSC Roadway Worker Protection Manual** establishes the required procedures, minimum safety standards, and controls needed to prevent unintended train movements, worker strikes, and other roadway-related hazards.

The manual defines the required **redundant protections**, communication protocols, and job-site controls necessary to ensure roadway workers can perform their duties safely. These protections include, but are not limited to:

- Establishing **exclusive track occupancy** or other forms of positive protection
- Assignment of a qualified **Roadway Worker-in-Charge (RWIC)** responsible for on-site safety
- Mandatory **Job Safety Briefings** before work begins and upon any job-site change
- Use of **lone worker protections**, proximity awareness, and continuous communication
- Implementation of **Good Faith Challenge** procedures when any worker identifies an unsafe condition
- Use of appropriate **personal protective equipment (PPE)** and roadway safety devices
- Coordination with the Operations Control Center (OCC) for track access, protection setup, and job completion
- Compliance with training, qualification, and requalification requirements defined in the RWP Manual

All roadway workers, supervisors, contractors, and visiting personnel must adhere to the policies, procedures, and responsibilities established in the **EPSC Roadway Worker Protection Manual** when working within the streetcar operating environment.

Track Access Training for all employees and contractors performing work in roadway or trackway environments will be conducted in accordance with the Roadworkers Protection Manual (RPM). The RPM outlines the required training topics, including hazard

identification, proper use of personal protective equipment, and emergency response procedures.

5. Safety Assurance (49 CFR 673.27)

5.1 Safety Assurance Process Overview

This section describes the different processes used to track the implementation of Sun Metro's Safety Management System.

Sun Metro evaluates roadway worker safety using:

- **RWP compliance audits**
- **Field observations of RWICs and crews**
- **Track access protection verification**
- **Redundant protection performance reviews**
- **Near-miss and incident trend analysis**
- **Periodic review of OCC authorization logs**
- **Annual RWP Program audit** (required by 49 CFR 671.45)

Corrective actions related to RWP deficiencies must be tracked in the Safety Assurance Corrective Action Log and reviewed monthly.

Sun Metro understands that hazard management is not only the management of new hazards but also the management of mitigating hazards. Sun Metro will evaluate the mitigations already implemented to verify their effectiveness.

This table is a simplified explanation of Sun Metro's Safety Assurance section:

Safety Assurance Decision Table	If yes, then...
Procedures, Monitoring, and Measurement	
Inadequate compliance?	Address non-compliance
Insufficient?	Evaluate hazards through the Risk Management Process.
Safety Risk Mitigation, Monitoring, and Measurement	
Ineffective?	Evaluate hazards through the Risk Management Process.
Inappropriate?	Identify new mitigation under the Risk Management Process.
Not implemented?	Address non-compliance

Safety Assurance Decision Table	If yes, then...
Safety Event Investigations	
Causal factors identified?	Evaluate hazards through the Risk Management Process.
Information collected?	Use to monitor and measure through other Safety Assurance processes.
Internal Reporting Programs, Monitoring, and Measurement	
Safety concerns identified?	Evaluate hazards through the Risk Management Process.
Information collected?	Use to monitor and measure through other SA processes.

5.2. Monitoring Roadworkers Safety

The Safety Department will evaluate compliance with the safety procedures outlined in the RPM through routine audits, inspections, and incident reviews. Feedback from these activities will be used to update and improve the policies detailed in the RPM and this PTASP

5.3. Safety Performance Monitoring and Measurement Section

5.3.1. Process to monitor compliance with operation and maintenance procedures

This section describes how Sun Metro will monitor:

- Compliance with and sufficiency of operations and maintenance procedures.
- Operations to identify safety risk mitigations that may be:
 - Ineffective could re-analyze the hazard(s) and consequence(s) the mitigation was intended to address through Risk Management.
 - Inappropriate, could identify new mitigation options.
 - The mitigation may not be feasible.
 - Not implemented as intended, could consider alternative mitigations or alternative approaches to implementation.

Sun Metro Key Staff will assess the information gathered using the processes described in this section and evaluate how to address it.

5.3.1.1. Facilities and Equipment Inspections

Please reference the Streetcar Operations Maintenance Plan (OMP) for more detailed information on the topics presented.

Facility Inspections

Periodic safety inspections are performed on all Sun Metro facilities to detect and resolve hazards in order to effectively safeguard employees, visitors, and passengers. The Safety Manager of the specific mode and/or maintenance staff will perform safety inspections of the Sun Metro facilities.

The Safety Manager of the specific mode is responsible for ensuring hazards are addressed and corrective actions are captured and logged in the consolidated Hazard Tracking log of that mode. The Safety Manager of the specific mode must complete at a minimum one quarterly safety inspection in the facility under their supervision. The inspection will include, but is not limited to, housekeeping, fire extinguishers, and guard rails/stair rails in the proper place.

For the Track Sweep on El Paso Streetcar, the maintenance staff will be properly trained to perform the track sweep inspection.

Note: Sun Metro does not fall under OSHA requirements but rather the City's own Safety Policy.

Equipment Inspections

- Inspections of facility equipment are made in accordance with appropriate maintenance manuals and procedures. The Safety Manager of the specific mode works with the Mode Maintenance personnel and Sun Metro Facilities to ensure equipment and facilities are maintained at an optimum level of safety. Hazards identified during inspections are entered into the Hazard Tracking Log of the mode as appropriate and tracked until closure is achieved.

5.3.1.2. Maintenance Inspections

Each mode is responsible for developing and implementing a Maintenance Inspection program. This program will be implemented by the Safety Manager of the specific mode with the support of Sun Metro CSO and the City of El Paso Office of Risk Management and Safety.

Each Sun Metro facility inspection report is sent to the responsible party to create the appropriate work orders. It identifies specific areas and targets specific recommendations for corrective action. Identified unacceptable hazards are reported to the CSO. Hazards identified during these inspections are entered into the Hazard Tracking Log of the specific mode as appropriate.

Work Orders are generated in Fleet Net software for defects identified during Streetcar Maintenance, Sun Metro Facilities Management, and EPSC Systems Maintenance inspections. Fleet Net is the software used by Sun Metro to generate, track, and close all work orders generated by the appropriate departments. Hazards identified during these inspections are entered into the Hazard Tracking Log as appropriate and evaluated by the Safety Manager of the mode. Mitigation of Hazards is tracked to closure using the mode Hazard Tracking Log.

Checklists for Facilities are included in the Facility Maintenance Plan, Vehicle Maintenance Plan, or other specific SOP. The checklists are created by the Mode Maintenance Department with the assistance of the Safety and Operations of the mode.

At random, the Safety Manager of the mode and/or Chief Safety Officer or SMS Executive will perform inspections to verify that previous inspections and maintenance were performed in accordance with OEM recommendations. If areas of improvement are found, the Facility and Maintenance department will be required to present CAPs to the CSO. Those CAPs will be included in the CAP Log for tracking and closure.

5.3.2. Safety Data

The Chief Safety Officer or SMS Executive & the Safety Manager of the mode will monitor the safety performance of the various Sun Metro operations. Safety Events, injuries, and other safety data are collected throughout the division and analyzed to determine trends within the organization. The safety data collected is analyzed to determine if safety performance meets established safety goals outlined annually.

The safety event data also helps to identify service areas that generate a higher percentage of events or potential for higher event rates. Safety data collected includes injuries to passengers, Sun Metro personnel, and the public; hazardous equipment failures; unacceptable hazardous conditions; vandalism and security hazards; and rules and procedures violations. The Safety and Security Division analyzes safety-related data to implement corrective action to assist in preventing or mitigating the recurrence of hazards.

Data Acquisition

Information regarding Safety Events and hazardous conditions of Sun Metro is obtained from several different reporting sources.

These include, but are not limited to, the following reports or logs:

- a. Safety Event/Injury Reports
- b. Blocking log
- c. Audits
- d. Inspections
- e. Ride checks
- f. Unusual Situations Reports
- g. Event Reports
- h. Transit Master Operation Event Report
- i. Employee/Occupational Injury reports
- j. National Transit Database (NTD) Safety and Security reporting module

Data Analysis

Hazard data is used to identify trends. Trends are then further analyzed and/or investigated by the Chief Safety Officer or SMS Executive and/or Safety Manager of the mode to determine causal factors. Interviews with personnel in the affected division(s) may also be conducted. The various safety teams identify hazards, areas susceptible to

events, traffic problems, and other critical factors to develop corrective actions for hazards.

Reports

The Safety Manager of the mode analyzes the data from reports, event investigations, safety committees, field inspections, Police Reports, and Risk Management. The Safety Manager of the mode also uses the data acquisition and analysis process to identify system trends and to monitor safety and security program performance. The Safety Manager of the mode provides monthly safety program performance reports to CSO.

Currently, safety performance reports (in conformance with those submitted to the National Transit Database - NTD) are submitted to FTA on a monthly and annual basis. The reports contain injury data regarding passengers, Sun Metro personnel, and customer/public Safety Events.

Sun Metro uses this report to establish safety performance goals and objectives for each coming year.

5.4. Process to conduct investigations of safety events to identify causal factors

Each mode is responsible for developing a specific event investigation procedure. The safety manager of each mode will develop and/or update their event investigation procedure. Each procedure will be submitted to Sun Metro CSO and AE for review and approval.

Each safety event is investigated as specified in the latest version of the Sun Metro Event Investigation Procedures. The Procedures will comply with 49 CFR Parts 672, 673 & 674, the State Rail Safety Oversight Rule (for streetcar) for rail safety events, and 49 CFR Part 1582 U.S. Department of Homeland Security Rule affecting transit systems. For Streetcar, please refer to SOP 700.1 Revision 1 as approved by TxDOT for details on safety event investigation.

All Sun Metro employees and contractors are expected to comply with Sun Metro safety event reporting procedures and use the forms prescribed. Roles, responsibilities, and event reporting thresholds are outlined in the procedures, including event notification, reporting, and investigation throughout the organization. The level of investigation required is dependent on the seriousness of the event.

The event investigation procedures will be revised **annually or any time** there is a change in the FTA or TxDOT regulations and requirements. In addition to the event investigation procedure, Sun Metro has SOPs to address event notification & event management.

5.4.1. Event Notification

All Safety Managers are required to develop an event notification procedure specific to their mode. As a minimum, the following notifications must be made:

- Internal Notification: Develop a process to notify Sun Metro Management in case of safety events that may require upper management notification.
- External Notification: At a minimum, the following external agencies will require notification within 2 hrs., as applicable:
 - Notification to FTA will be submitted by TOC-1@dot.gov / **202-366-1863**
 - The notification will be submitted using the TxDOT – SSO Tracker for initial Major Event Notification (for Streetcar within 2 hrs.).
 - The National Transportation Safety Board will be notified by calling the National Response Center at 1-800-424-0201

5.4.2. Event Investigation Methods

The following investigative methods will be included, but are not inclusive of the investigation process:

- On-site inspection of the event scene.
- Review (if necessary) of:
 - Maintenance, operations, or employee training records and
 - The results of post-accident drug and alcohol tests
 - Camera footage, audio recordings, and other data downloaded from electronic devices and recorders
- Collection of all pertinent facts and evidence available, or near the scene of the safety event.
- Conduct interviews of employees involved or other witnesses at the site when appropriate;
- Observe employees in the performance of work
- An assemblage of all pertinent reports, data, and records associated with the safety event.
- Conduct follow-up interviews and/or re-enactments to complete the event investigation
- Perform analysis as required to determine the causative factor(s) for each safety event.

5.4.3. Photographs

All accident investigation scenes must be photographed as soon as possible from a panoramic view, preferably before the accident scene is disturbed. Scene photographs should be taken using a '4-point compass' method. The entire scene should be photographed from multiple vantage points. The photographer should attempt to provide sufficient depth of field to show the relative positioning of objects and subjects for later comparison with diagrams.

Arrange to have specific objects or subjects photographed as soon as possible from both normal periphery and close-up views, preferably, **before the accident scene is disturbed**. These photographs should attempt to include, at a minimum:

- a. For each vehicle involved, the exterior has four sides, including a number
- b. Each vehicle involved, an interior compartment
- c. Each vehicle involved, operating the control compartment

- d. Resting position of wheels on the track, including evidence of sanding
- e. All visible points of vehicle damage
- f. Evidence of wheel marks on the rail
- g. All visible points of infrastructure damage
- h. Any visibly evident contributing obstructions, objects, or conditions
- i. Position of casualties, if stationary
- j. Any other subject that appears out of the ordinary

5.4.4. Reports

It will be the responsibility of each Safety Manager to prepare an event report. All Event Investigation Reports will be reviewed and approved by the Mass Transit Chief Safety Officer, SMS Executive, or designee.

The Event Investigation Reports must compile the safety event information and findings evaluated during the investigation process, and will include the recommendations to prevent recurrence with the corrective action plan.

For Streetcar, the report will be prepared using TxDOT's Industry Safety software. Refer to Streetcar SOP 700.1 *Event Investigation* for details.

5.3.5 Allegations of Noncompliance

Sun Metro's acknowledgement of sec 1.3 of the program standards, TxDOT has primary responsibility for the investigation of any allegations of noncompliance with an RTA's PTASP. TxDOT will use the following criteria to evaluate allegations to determine whether they constitute noncompliance:

- The RTA takes action that directly violates published content within its PTASP.
- An RTA transit worker takes action that directly violates published content within its PTASP.

Allegations reported via electronically and by telephone must adhere to the following guidelines:

1. Provide your information to the responding SSO Program Manager
2. Persons notifying TxDOT of allegations of non-compliance may do so anonymously, but are encouraged to provide contact information in case TxDOT needs additional information to investigate the allegation.
3. Provide sufficient detail for TxDOT staff to determine whether TxDOT SSO has jurisdiction over the allegation, as well as to determine the pertinent facts of the allegation.

The TxDOT SSO Program Manager will acknowledge receiving the allegation, manage the investigation of the allegation, and submit a report and findings of the investigation to the TxDOT Public Transportation Division leadership within 30 calendar days. Extensions may be granted for valid investigation purposes by the division leadership.

TxDOT may investigate allegations or refer them to the affected agency's Chief Safety Officer (CSO) for investigation. In either case, TxDOT will ensure the completion of a thorough, impartial investigation and investigation report within 30 calendar days.

If TxDOT determines the allegation does not constitute noncompliance with the RTA's PTASP. But rather than an issue the RTA can address through its safety risk management process, TxDOT will notify the complainant accordingly.

5.5. Continuous Improvement Section

5.5.1. Internal Safety Audit

The purpose of internal system safety audits is to perform an official evaluation of accomplishments, problems, and trends related to total Sun Metro safety and to evaluate the effectiveness of the implementation of the PTASP.

The SMS Executive/ CSO is responsible for the direction of the safety reviews and audits of Sun Metro divisions and contractors to determine performance related to the System Safety goals and objectives. The audits will be performed by the City of El Paso Office of Risk Management.

All Sun Metro divisions and contractors are subject to safety audits. The critical nature of certain operations requires rigorous development of reviews and audits. These include training, maintenance, and operations activities. Both periodic and no-notice inspections are undertaken to address all aspects of the activity, including documentation, practices, and compliance with the PTASP, Sun Metro policies, and other requirements.

The CSO reviews training, practices, and procedures to correct deficiencies identified while conducting audits or other safety activities, including inspections and emergency drills.

If a federal or state regulation is violated, TXDOT may initiate administrative action, starting with a written notification to the RTA. This notification will detail the violations, required actions, and the process for administrative review if the Sun Metro/ EPSC disagrees.

Sun Metro/EPSC must submit documentation to TXDOT to show compliance or request an administrative review. TXDOT will issue a final decision within 60 calendar days of receiving the appeal. Failure to comply will result in escalated enforcement, which may include rescinding approval of Sun Metro/EPSC's safety plan, issuing an emergency order for public safety, or seeking a temporary injunction. For more information on administrative actions, review the Texas Administrative Code, Chapter 7, Subchapter E - Rail Fixed Guideway System State Safety Oversight Program.

5.5.1.1. Purpose and Scope

The purpose of internal safety audits is to confirm that all safety elements are in place and that assigned safety tasks and activities are being accomplished. This provides an

additional means of documentation for senior management to verify how well each division is fulfilling its safety-related goals and objectives as required in the PTASP.

5.5.1.2. *Safety Audit Process*

The Chief Safety Officer or SMS Executive, with the help of the Office of Risk Management of the City of El Paso, is responsible for the management of the Internal Safety Audit Program. All Sun Metro divisions are required to cooperate fully with Safety and Security personnel. Executive and senior managers ensure their divisions participate fully in the safety audit process. The Office of Risk Management of the City of El Paso is responsible for submitting to TxDOT the auditing checklist for Streetcar, a minimum of 30 days in advance of a scheduled safety audit.

5.5.1.3. *Integrity of Review Process*

To maintain the integrity of the review process, an audit team is used to conduct safety audits. The Safety Manager of the mode does not perform audits/reviews of those functions and elements for which they are directly responsible for implementation. These elements are audited by the Chief Safety Officer or SMS Executive and Office of Risk Management of the City of El Paso, an outside contractor, or an independent member of the audit team. No team member shall audit a function or activity for which they are responsible.

5.5.1.4. *Cycle/Schedule*

Over a three-year period, all the elements of the PTASP must be audited at least once. Sun Metro's Internal Safety Audit Process is intended to be an ongoing, continuous safety review process. The CSO/SMS Executive will provide and submit annually a comprehensive Internal Safety Audit schedule detailing when it will audit these elements over the three-year period.

The annual audit schedule must be developed, reviewed, maintained, and updated to ensure all elements of the PTASP are reviewed during the audit cycle.

Tentative Sun Metro Audit Schedule 2026

2026	Sun Metro - Lift	Sun Metro - Streetcar	Sun Metro - Bus
60-Day Notice to Sun Metro	Tuesday, April 7, 2026	Monday, July 6, 2026	Monday, May 11, 2026
30-Day Notice to Sun Metro	Thursday, May 7, 2026	Thursday, August 6, 2026	Wednesday, June 10, 2026
Audit Commencement	Monday, June 8, 2026	Monday, September 7, 2026	Monday, July 6, 2026
Audit Conclusion	Friday, June 12, 2026	Friday, September 11, 2026	Friday, July 10, 2026
Sun Metro Responses	Monday, July 13, 2026	Monday, October 12, 2026	Monday, August 10, 2026
Finalized Audit Report	Thursday, August 13, 2026	Thursday, November 12, 2026	Thursday, September 10, 2026

The Chief Safety Officer or SMS Executive and/or Safety Manager notifies the division/organization and TxDOT (for streetcar) a minimum of 60 days in advance of a scheduled safety audit.

5.5.1.5. Checklists and Performance of Safety Audits

Audit checklists are developed in advance for each transit mode by the City of El Paso Office of Risk Management. The checklists include the elements on which the department will be audited. Checklists are prepared during the review of the PTASP section, documents referenced in previous audits, and corrective actions.

The Sun Metro's auditing checklists must be submitted by the City of El Paso Office of Risk Management to TxDOT for review and approval. This review package shall be submitted in time to receive TxDOT approval no less than 60 days prior to conducting the ISR. The Audit checklists are then provided to the organization being audited as soon as possible after receiving TxDOT's approved checklist(s).

The review package shall include the following information:

- Identify the departments, employees, and contractors responsible for scheduling, managing and conducting the annual review;
- PTSCTP Certification for personnel conducting the internal safety review;
- Identify the departments and functions subject to review.
- At a minimum, the annual approval package shall identify the RTA personnel participating in the review, contact information, interview schedules, and a listing of the on-site audit locations.
- Develop templates, checklists, and procedures for conducting the ISR. These materials shall include sufficient criteria to determine if all audited elements are implemented as intended.

Pre-audit and post-audit conferences are held by the audit team with the entity being audited. The safety audits are comprised of record reviews, interviews, field observations, and inspections and measurements to verify the accuracy of documentation and spot inspections of facilities and equipment to verify compliance with the PTASP, procedures, codes, and regulations.

The following list of documents may be used to support the development of the audit checklists:

- PTASP
- Rule Book, bulletins, and/or procedures
- Standard and emergency operating procedures
- Training program documentation
- Management and/or administrative plans/procedures
- Design standards and criteria
- Event investigation reports

- Hazard tracking logs
- Corrective Action Plans
- Previous audit reports
- Other sources, as determined by TxDOT SSO upon request

5.5.1.6. Audit Report

Upon completion of each audit report, the City of El Paso Office of Risk Management will issue a final report of the results and specify areas of deficiency, prepare recommendations, identify the need for corrective action plans, and distribute copies of the report to the Sun Metro Management staff and the audited Division. Responsible Divisions are expected to develop corrective actions, though the audit team may make recommendations and must approve corrective actions.

The results of the audit will be used for positive corrective action, and not as an internal regulatory process. Safety Audit coordination meetings and management briefings are to be held to review areas of concern or disagreement over findings and evaluate possible corrective actions. The Safety Manager will monitor and track corrective actions with the affected divisions to ensure implementation.

The Chief Safety Officer or SMS Executive will provide a draft safety audit report generated by the City of El Paso Office of Risk Management to TxDOT SSO for the El Paso Streetcar. RTA shall submit the ISR final report to TxDOT within 60 days of the closeout meeting. In no case shall the RTA submit the ISR final report later than February 1st. TxDOT SSO will make additional recommendations to the audit report before the final issue of the report. The Office of Risk Management of the City of El Paso will submit the auditing reports to the Accountable Executive. The Accountable Executive is responsible for signing the report and submitting it to TxDOT.

5.5.1.7. Annual Report Review

Sun Metro/EPSC will prepare and submit an Annual Report to the State Safety Oversight (SSO) agency in compliance with the Federal Transit Administration (FTA) requirements. The Annual Report will provide a comprehensive summary of safety-related activities, performance, and initiatives undertaken during the reporting year.

The SMS Executive/Chief Safety Officer (CSO) will oversee the preparation of the Annual Report, ensuring that all required elements are included and accurate. The CSO will coordinate with the SSO agency to address any questions or additional requests regarding the submitted report.

Sun Metro/EPSC will adhere to the following timeline for the submission of the Annual Report to the SSO agency:

- By January 15th, TxDOT will review the required items and notify the RTA Safety Staff of any missing or outdated documents or data that the RTA must correct prior to TxDOT submitting the annual report to the FTA.

- No later than February 1st, the RTA must make all requested data corrections and submit any requested documentation to TxDOT. TxDOT SSO
- Program Managers will coordinate with RTA staff until all document and data requests are completed so TxDOT may submit the annual report by FTA's March 15th deadline.

Sun Metro/EPSC must also include a formal letter signed by the Executive Director/Accountable Executive certifying its PTASP. If the safety audit's findings indicate noncompliance with its PTASP, the Executive Director/Accountable Executive must identify in the formal letter the nature of the noncompliance, the activities that the RTA will take to achieve compliance, the date that those activities will be completed, and the projected date that compliance will be achieved.

5.5.1.8. Coordination with TxDOT

As noted above, the following aspects of the Internal Safety Audit Process are coordinated with TxDOT regarding the streetcar:

- Internal Safety Audit Cycle and Schedule
- Safety Audit Checklists
- Dates of Completion of each Safety Audit
- Each Safety Audit Report
- Corrective Action Plans
- The Annual Safety Audit Report
- The Director of Annual Certification

5.5.1.9. Review Completeness

The CSO (or other entity performing safety audits) is responsible for ensuring the Safety Audit Checklists provide for a complete review of each of the PTASP Elements. In addition, the Safety and Security Division (or other entity performing safety audits) shall ensure the required Safety Audit/Review reports are comprehensive and accurate.

5.5.2. Rules Compliance

Each Sun Metro mode is required to have and implement a Rules and Regulations Manual. These manuals are distributed to all new employees upon new recruit orientation. Ongoing training is provided through the rulebooks and procedures during operations and in maintenance training courses.

5.5.2.1. Review of Rules and Procedures

Policies, plans, rulebooks referenced above, and procedures are reviewed periodically to verify they meet the needs of the transit system in normal and emergency conditions. Accordingly, Sun Metro Instructors target safety practices intended to instill a safety culture in its workforce.

The Chief Safety Officer or SMS Executive and each mode's safety and operations manager coordinate additions to or deletions from these documents that impact the safe

operation of the system. Sun Metro Manuals, Policies, and Procedures by mode stipulate control and distribution, including the three-year review process.

The length of time needed for the review may vary based on the document being reviewed, but no reviewer should delay the evaluation/review process more than thirty (30) days. The section managers may issue a Bulletin, Notices, General Orders, and Operating Orders when an immediate update is required to an operating rule or procedure. Sun Metro safety committees, Safety Events, and audit reviews are additional opportunities for rules review.

5.5.2.2. Process for Rules Compliance

Each Sun Metro Supervisor (regardless of the mode) shall conduct ride checks of each operator at a rate determined by each mode.

Each mode uses specific **Ride Check Forms** to evaluate the operators in a standardized way. Ride Checks provide an opportunity for retraining employees to an acceptable level of compliance regarding specific rules.

Sun Metro Safety Division will perform random DVR reviews to verify the rule compliance of the drivers. Refer to SOP 600.13 Random DVR Inspections.

5.5.2.3. Compliance Techniques – Operations and Maintenance Personnel

Compliance techniques include observation of work activities and tasks, and asking pop-up questions regularly to employees about their knowledge of the respective rulebooks and handbooks. During initial training, employees are formally tested on their knowledge of applicable rules and procedures through written examinations.

5.5.2.4. Compliance Techniques – Supervisory Personnel

The Safety Manager or designee of each mode conducts ride checks to evaluate the effectiveness of compliance methods utilized by supervisory personnel. The ride checks assess employees' knowledge of rules and procedures and validate the success of Sun Metro's employee training programs.

Ride check forms completed are forwarded to the Mode Operations Manager to be included in employee performance reviews. Recommendations for improvement of the compliance methods are submitted.

5.5.2.5. Documentation

The results of the proficiency checks performed by operations and maintenance supervisors are documented on the appropriate form and are made available to the Safety Manager and Chief Safety Officer, or SMS Executive. Hazards identified during these operations and maintenance rules compliance checks and assessments are captured within the Hazard Tracking Log and subsequently tracked to closure.

All Ride Checks are performed following the transit mode SOP for Ride Checks. All forms will be included in the employees' training folder.

5.5.3. Local, State, and Federal Rules Compliance

Sun Metro is committed to a dedicated safety program covering all applicable federal, state, and local regulatory requirements to ensure a safe and healthy work environment, including guidance provided by the State Safety Oversight Agency, FTA, and Guidelines to prevent or control exposure to infectious diseases provided by the CDC or a State health authority.

The Safety Manager of each mode has the primary responsibility of safety program implementation and enforcement to ensure that the employees in their respective mode are aware of job-related hazards through an ongoing process of training, job briefings, and departmental notices located throughout all affected areas.

5.5.3.1. Risk Reduction Program

As established in the Bipartisan Infrastructure Law requires Sun Metro's Public Transportation Agency Safety Plan (PTASP) to include the risk reduction program that include the following topics:

- (I) Transit operations to improve safety by reducing the number and rates of events, injuries, and assaults on transit workers based on data submitted to the national transit database
 - a. The mitigation of assaults on transit workers, including the deployment of assault mitigation infrastructure and technology on Transit vehicles, including barriers to restrict the unwanted entry of individuals and objects into the workstations of transit operators, when a risk analysis performed by the safety committee determines that such barriers or other measures would reduce assaults on transit workers and injuries to transit workers.
- (II) A reduction of vehicular and pedestrian events involving transit vehicles includes measures to reduce visibility impairments for transit operators that contribute to safety events, including retrofits to vehicles in revenue service and specifications for future procurements that reduce visibility impairments.
- (III) The safety committee shall establish performance targets for the risk reduction program using a 3-year rolling average of the data submitted by the recipient to the national transit database under section 5335.

5.5.3.2. Sun Metro Risk Reduction Program Table by Mode

Sun Metro Para Transit

Risk Reduction Program Targets	2023	2024	2025*	2026
Total Vehicle Revenue Miles	1994510	2371684	2513985	2415952
Major Events Total	3	5	2	3
Major Events Rate	0.1504	0.2108	0.0795	0.0875
Collision Total	24	32	27	29
Collision Rate	1.2033	1.3492	1.0739	1.0875
Injuries	4	3	2	3
Injury Rate	5.36	3.13	2.34	3.01
Transit Worker Injury Rate	5.36	3.13	2.34	2.47
Assaults on Transit Workers	0	0	0	0
Assaults on Transit Workers' Rate	0	0	0	0
System Reliability				

Sun Metro Fixed Route

Risk Reduction Program Targets	2023	2024	2025*	2026
Total Vehicle Revenue Miles	5,712,826	5,589,182	5,478,070	5,649,201
Major Events Total	16	17	17	18
Major Events Rate	0.28	0.3	0.31	0.45
Collision Total	136	136	133	139
Collision Rate	2.38	2.43	2.42	2.45
Injuries	46	43	41	42
Injury Rate	9.23	8.33	8.2	8.53
Transit Worker Injury Rate	6.82	6.82	6.48	6.82
Assaults on Transit Workers	1	2	1	2
Assaults on Transit Workers' Rate	0	0	0	0
System Reliability	238,000	189,244	240,000	256,355

Sun Metro El Paso Streetcar

Risk Reduction Program Targets	2023	2024	2025*	2026
Total Vehicle Revenue Miles	41,046	67,275	73,734	85,094
Major Events Total	1	0	0	0
Major Events Rate	0.12	0	0	0
Collision Total	8	26	13	12
Collision Rate	0.97	1.93	1.49	1.33
Injuries	3	1	1	1
Injury Rate	11.53	3.84	8.4	1.18
Transit Worker Injury Rate	27.47	13.73	13.73	
Assaults on Transit Workers	0	1	0	0
Assaults on Transit Workers' Rate	0	0.07	0	0
System Reliability	39,812	67,275	70,000	85,094

5.5.3.3. Exposure to Infectious Diseases

As established in the Bipartisan Infrastructure Law, Sun Metro's Public Transportation Agency Safety Plan (PTASP), Sun Metro shall develop strategies to minimize the exposure of the public, personnel, and property to hazards and unsafe conditions, and consistent with guidelines of the Centers for Disease Control (CDC) and Prevention or a State health authority, minimize exposure to infectious diseases. To comply with this requirement, Sun Metro has established its Bloodborne Pathogens SOP and our Pandemic Plan to reflect the best practices of the industry and CDC guidelines.

5.5.3.4. Transit Worker Assault Awareness and Prevention for Transit Employees

To prevent and protect Transit Employees from physical assaults, including (hitting, spitting, beatings, stabbings, and things being thrown at operators, threats, intimidation, and any other hostile act.

- Install protection barriers or shields in the driver's area to minimize the severity of assault.
- Conduct conflict and aggression training for all transit employees, consisting of de-escalation techniques for drivers, focusing on key factors:
 - (I) Defining assault and identifying transit employee assault events – define what is considered assault and identify factors that increase vulnerability to assault events.
 - (II) Recognize key vulnerability factors – Identify behaviors that help maintain professionalism, decide which communication skills to use when dealing with

- passengers and customers, and practice strategies and techniques to defuse difficult interactions with the public.
- (III) Practice communication and response skills – Conduct role-playing scenarios and solutions to a potential assault scenario.
 - (IV) Reporting safety events – how to evaluate the severity and be able to report to the correct jurisdictional authorities
 - (V) Importance of seeking assistance when assault events occur – to realize the significance of reporting and explain the importance of seeking help and/or assisting when there is difficulty dealing with public assault events.

The above training standards and practices will assist transit employees in:

- Identifying safety hazards and potential consequences.
- Assess the associated safety risks and prioritize hazards based on the safety risk of potential consequences.
- Identify necessary mitigations or strategies to reduce the likelihood and severity of the hazard's potential consequences.

5.6. Corrective Actions

This section describes the general process of how Sun Metro will manage all corrective actions generated after the occurrence of a major event and subsequent investigation; the development of recommendations, the identification of an unacceptable hazardous condition, or hazards, along with deficiencies identified through internal or external safety reviews/audits.

The Mode Safety Manager will notify the CSO / SMS Executive and develop a CAP within 5 days of entering the CAP into Sun Metro's CAP Log. The CSO / SMS Executive will track and update the CAP Log every month. The Mode Safety Manager may request additional time to prepare the CAP for complex issues.

The corrective action plan will include:

- The hazard or deficiency identified, and an investigation (if relevant to the CAP);
- Proposed Corrective Actions
- Proposed Timeline

Proposed actions planned to minimize, control, correct, or eliminate the unsafe or hazardous condition, including interim action if required;

- Scheduled date of completion of implementation.
- Division and an individual responsible for implementing the CAP; and
- Comments were subsequently added pursuant to the review and closure of the CAP.

Sun Metro evaluates roadway worker safety using:

- **RWP compliance audits**
- **Field observations of RWICs and crews**

- **Track access protection verification**
- **Redundant protection performance reviews**
- **Near-miss and incident trend analysis**
- **Periodic review of OCC authorization logs**
- **Annual RWP Program audit** (required by 49 CFR 671.45)

Corrective actions related to RWP deficiencies must be tracked in the Safety Assurance Corrective Action Log and reviewed monthly.

Immediate or Emergency corrective action that must be taken to ensure immediate safety requires a 48-hour notification to TxDOT before implementation and must include:

- Source of the CAP,
- Location, if applicable,
- Summary of the issue requiring corrective action,
- Proposed corrective actions,
- If the CAP is an immediate or emergency corrective action,
- Date the issue requiring corrective action was discovered,
- Estimated start date,
- Estimated completion date, and
- Responsible Party and department(s) responsible.

The status of each Corrective Action is reported at LMSC Meetings. All corrective actions are prioritized for implementation using the risk assessment matrix, and they are assigned a responsible person to lead the corrective action effort and close the corrective action after resolution. TxDOT requires that El Paso Streetcar CAPs be uploaded and tracked using SSO Tracker within 30 days of discovery. An exception is made for immediate or emergency corrective actions that must be taken to ensure immediate safety, provided that TxDOT is notified within 48 hours of implementation. TxDOT will notify Sun Metro/EPSC of its approval or rejection of a CAP within 30 calendar days of receipt. In the event TxDOT rejects a CAP, TxDOT will state its reasons in writing and recommend revisions. Sun Metro/ EPSC shall submit a revised CAP to TxDOT no later than 14 calendar business days following the rejection. TxDOT will work with the Sun Metro/EPSC to resolve any disputes relating either to the development or execution of the CAP or the findings of an investigation. In the event of a dispute concerning TxDOT's decision related to a CAP, no later than 30 calendar days after receipt of the written decision, Sun Metro/ EPSC may request an on-site meeting or conference call with the TxDOT SSO Program Manager and PTN leadership to discuss the proposed CAP.

Sun Metro/EPSC may request an Administrative Review as specified in 43 TAC 7.93 to appeal the rejection or approval of a CAP. The Administrative Review will be decided by the TxDOT Executive Director or Deputy Executive Director and will be the final decision regarding the CAP. Each mode is required to develop an SOP on how the

mode will manage its specific CAPs. However, all SOPs must be approved by the CSO/SMS Executive for compliance with SUN Metro ASP.

In the event of a conflict between the definitions in the agency's safety plan, the TxDOT program standard, or federal regulations, the regulatory definitions shall take precedence.

Note: Sun Metro/EPSC acknowledges and will comply with the specific requirements outlined in Section 10.1 of the TxDOT Program Standard regarding TxDOT's authority to issue emergency orders, as detailed in Section 1.2 of the Program Standard, which provides the SSOA Authority and includes the escalation of enforcement actions if a RTA fails to comply with a corrective action plan, administrative action notification, or an emergency order.

5.7. Management of Change

The Management of Change addresses the processes to be followed to evaluate the risk of any changes proposed at all levels of the organization. The overall purpose of this process is to ensure that any proposed changes that impact operations will not increase safety risk, or where additional risk is identified, that controls are put in place prior to the changes being implemented. Refer to Appendix C for a copy of the Configuration Management Plan.

Changes to organizational structure, the nature or extent of operations, facility or equipment assets, as well as mergers and acquisitions of new businesses, are proactively managed through this process to avoid introducing or increasing safety risks.

- The resources required to complete the validation process, in terms of people, finance, and materials, are included in this validation process.
- The allocation of responsibilities considers the competence of the individuals who are required to carry out the safety validation roles.
- All employees who may be affected by the proposed changes are consulted as part of the process.

The extent and scope of safety validation applied to any change proposal are proportional to the risks (safety, operational, and other risks) associated with its introduction.

In the case of smaller, less complex, or well-understood changes, the safety validation of the change process may be implemented as part of normal operations, using existing organizational arrangements and meeting structures to deliver the required level of assurance.

Changes shall be classified as either Class I or Class II levels of safety validation. The originator may make an initial determination of the class of a proposed change; however, the Accountable Executive, the Chief Safety Officer, or the SMS Executive may make changes to the original classification. The Accountable Executive has final decision-making authority as to the Class of the configuration change.

Class I Changes

Class I changes shall be developed and individually submitted for each proposed change through a standardized Engineering Change Request (ECR) document, and/or through some other approved documented request process. The ECR or documented request will provide detailed information and any other related data to support the formal change approval, which will affect a change to the configuration of an asset. Class I changes directly affect the following:

- a. Form, fit, or function of an asset
- b. Safety of the transit system
- c. Warranty provisions of the test
- d. Acquisition or support costs of an asset or future spare parts

Class II Changes

Class II changes are all changes that are not classified as Class I changes. Generally, Class II changes are those required to amend, update, or add clarification to documents and drawings. All Class II changes are to be submitted individually on a standardized form, and/or through a documented request, with a detailed description of the proposed change.

The process is generally described in the following chart.

Safety Validation of Change Process		
Main Steps	Key Activities	Completed By
1. Identify a Proposal for Change	- Raise a change proposal (including Capital Expenditure Approval) - Inform relevant functional Manager(s)	Change proposer
2. Determine the Classification of Change Significance	- Classify the level of safety validation required. - Ensure the extent and scope of validation are proportional to the level of risk.	Change proposer
3. Allocate Roles & Responsibilities	- Formally allocate the change sponsor and change authorizer - Identify other required resources and roles for consultation	Change proposer (with guidance)
Submit Change Proposal Form		Change proposer
Decide whether safety validation should proceed.		Change proposer
4. Prepare Safety Validation of Change Case	- Prepare safety validation documentation - Complete risk assessment of the proposed change - Submit for review - Revise and finalize documentation	Change proposer & Mode Safety Manager
Submit the Safety Validation Checklist with supporting documentation		Change proposer
Approve and Implement, or Reject Change		CSO, AE

Safety Validation of Change Process		
Main Steps	Key Activities	Completed By
5. Monitoring and Review	• Monitor implementation of change and safety performance • Review the performance process	Safety Manager

As part of the process to ensure specific safety concerns have been identified and addressed.

Additional responsibilities in the Safety Validation of Change process include:

- CSO provides safety expertise/support to those carrying out the safety validation.
- Safety Managers:
 - Review and approve each safety validation of the change process.
 - Decide on the level of safety validation required (consulting with other functional heads as necessary).
 - Provide safety expertise/support during safety validation activities as required.
 - Provide safety expertise/support to those carrying out the safety validation.

An electronic log of all proposed changes, whether approved or not, is maintained by the Mode-specific Safety Manager.

Each mode is responsible for developing its Management of Change SOP based on the process described previously. These SOPs will be submitted to the CSO / SMS Executive and AE for review and approval.

The process described previously in this section for monitoring safety data incorporates continuous improvement. As safety risk is identified and then reported on, a determination is made as to whether the risk can be mitigated immediately or requires more time and resources.

Risk mitigations that can address the safety concerns immediately are carried out, but are still reported. The reporting of these concerns includes the mitigation steps that have been taken. Monitoring of the risk continues to ensure that the mitigation strategy is effective.

The Safety Risk Management section of this document describes the risk assessment and mitigation procedures used that determine how to proceed with improvement strategies that require more time and resources. Which improvement strategies to implement for longer-term issues are based on the severity and probability of risk occurrence? Additionally, safety hazard identification data is used to implement immediate corrective actions and proactively identify hazards before they cause future safety events.

The objective of hazard identification is to distinguish those conditions that can cause an event or create an unsafe condition. Sun Metro routinely analyzes records from our

operations to identify event causation based on history. Current traffic conditions are periodically analyzed, and management inspections of established prevention processes are routinely performed.

New or Modified Rail System Requirements

El Paso Streetcar/Sun Metro is required to develop and submit a safety and security certification plan (SSCP) for TxDOT approval for new or modified rail systems. For smaller projects that do not involve preliminary engineering or engineering, RTAs must submit the SSCP prior to commencing the project. For larger projects that follow a traditional project development phase, TxDOT requires the SSCP to be submitted not later than the end of the preliminary engineering phase. In either case, TxDOT will coordinate with the RTA to reach a mutually agreeable date for the submission of the SSCP.

The SSCP is a scalable, project-specific plan that describes the activities the RTA will complete to ensure safety concerns and hazards are adequately addressed prior to the initiation of revenue operations. TxDOT will review the SSCP within 30 days of submission.

Safety and Security Certification Verification Report (SSCVR)

At least 60 calendar days prior to revenue service or non-revenue/operational use, EPSC/Sun Metro will submit a SSCVR to TxDOT for review.

The SSCVR is the final report verifying that the project complies with all safety requirements identified by the agency's SSCP. The SSCVR shall contain:

- Executive summary of the project status
- Summary of Activities Performed:
 - Certifiable items list
 - Completed conformance checklists and certificates
 - Integrated testing results
 - Updated manuals, SOPs, and procedures
 - Operations and maintenance training
 - Hazard Assessments, including associated hazard logs
- List of open items or logs, restrictions, and hazards, and the plan, including actions required, responsibility, and schedule for resolving open items, restrictions, and hazards
- Certificate of Safety verifying the project is safe for revenue service

TxDOT will review the SSCVR within 30 days to determine project conformance with the SSCP and PTASP, and to assess if Sun Metro/ EPSC complies with TxDOT requirements. During the review period, TxDOT may conduct readiness review activities, including on-site reviews, observations, meetings, and teleconferences. Additional information, documentation, or clarification may be requested by TxDOT before concurrence is provided. At the conclusion of the review period, TxDOT will

provide a letter of concurrence to the SMS Executive/CSO stating the project has satisfied TxDOT SSO requirements.

6.0 Safety Promotion Chapter (49 CFR 673.29)

6.1 Competencies and Training Section

- Instructions on safe methods of operation and safety procedures are included in rulebooks, manuals, handbooks, and other documentation developed for the training and certification of operations and maintenance personnel. Training systems have been developed to include in-house classroom training, field training, on-the-job training, and testing.
- Each Mode is responsible for establishing specific safety training requirements for its employees and contractors. The Mode Safety Manager is responsible for providing/coordinating new and revised safety training programs to the Chief Safety Officer or SMS Executive for approval.
- Each mode Training Plan must be compliant with 49 CFR 672 Public Transportation Safety Certification Training Program. As required, the Mode Training Plan must identify the safety-sensitive positions and their safety curriculum per position, including required retraining.

Sun Metro ensures roadway workers receive:

- Initial and recurring RWP training
- RWIC training and qualification
- Lone worker training
- On-track safety drills
- Emergency management training
- Job Safety Briefing competency checks

Safety communication includes:

- RWP bulletins
- Safety messages
- Distribution of rule updates
- Posting of updated RWP procedures at dispatch and maintenance areas

Employees must demonstrate competency through testing, field evaluations, and annual refresher training.

6.1.1 Training and Certification Program

Each Mode Safety Manager at Sun Metro is responsible for the development and implementation of their respective Training and Certification Plans (TCPs). These plans align with the requirements outlined in the **Public Transportation Safety Certification Training Program (PTSCTP)** as per **49 CFR Part 672** and the **Public Transportation Agency Safety Plan (PTASP)** as per **49 CFR Part 673**.

1. Regulatory Requirements
 - FTA's Public Transportation Safety Certification Training Program (PTSCTP)
 - Establishes a uniform safety certification training curriculum to enhance the technical proficiency of individuals conducting safety audits and examinations. (§672.1(a))
 - Applies to personnel directly responsible for safety oversight of public transportation systems.
 - FTA's Public Transportation Agency Safety Plan (PTASP)
Requires the establishment and implementation of a comprehensive safety training program for employees and contractors directly responsible for safety.
 - Mandates refresher training as necessary. (§673.29(a))

Designation of Safety Personnel

In accordance with **49 CFR 672.13**, Sun Metro designates specific personnel subject to PTSCTP requirements. Designated personnel are those whose primary job functions include developing, implementing, and reviewing the PTASP and related safety oversight activities.

The following positions at Sun Metro are classified as **Designated Personnel**:

1. Chief Safety Officer (CSO) or SMS Executive
2. Transit Safety Manager
3. Streetcar Safety Manager
4. Transit Safety & Security Officers
5. LIFT Operations and Safety Manager
6. Risk Management Senior Safety Specialist (responsible for audits)

Training Requirements for Designated Personnel

Designated personnel must complete the following training requirements within three years of their initial designation:

- SMS Awareness: 1 hour
- Safety Assurance: 2 hours
- SMS Principles for Transit: 20 hours
- TSSP Curriculum:
 - Rail System Safety: 36 hours
 - Effectively Managing Transit Emergencies: 32 hours
 - Rail Incident Investigation: 36 hours

Refresher Training:

- Required every two years.
- Must include a minimum of one hour of safety oversight training.
- Sun Metro documents refresher training requirements within the PTASP and ensures compliance.

Evaluation of Prior Training and Certification

Designated personnel may request the Federal Transit Administration (FTA) to evaluate prior safety training or certifications to determine if they meet the requirements of **49 CFR 672**. Requests are submitted to the FTA via **FTASafetyPromotion@dot.gov**.

Recordkeeping and Individual Training Plans (ITPs)

In compliance with **49 CFR 672.21**, Sun Metro ensures:

- All designated personnel enroll in the PTSCTP.
- Individual Training Plans (ITPs) are created, maintained, and updated as training is completed.
- Training records are retained for at least five years.
- Information on enrollment and ITP creation is available on the FTA's Transit Safety Training webpage: FTA Transit Safety Training.

Existing Training Plans

- El Paso Streetcar Training Plan:
 - Revision 1, dated September 2021, reviewed and approved by TxDOT.
 - Includes training on required Standard Operating Procedures (SOPs) for operations and maintenance.
- Maintenance Training:
 - Maintenance personnel are trained on Standard Maintenance Procedures developed by Sun Metro/El Paso Streetcar.

Annual Review and Compliance

Each mode's Training and Certification Plan must be:

- Submitted to the Chief Safety Officer or SMS Executive for review and concurrence.
- Reviewed annually by the Mode Safety Manager to ensure compliance with PTSCTP and PTASP regulations, and updated as necessary to reflect operational or regulatory changes.

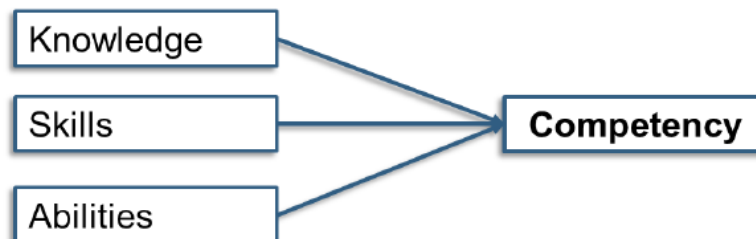
Notification and Coordination with SSO

- Sun Metro collaborates with the Texas Department of Transportation (TxDOT) as part of the SSO program.
- The CSO ensures notification to the SSO regarding the completion of required training, certifications, and any updates to TCPs.
- Annual submissions to the SSO include:
 - Designated personnel certifications.
 - Training program updates and compliance reports.
 - Internal Safety Review findings and resolutions.

6.1.2 Competency

Competency combines the knowledge, skills, and abilities required to effectively fulfill job roles.

- 1) May cross various job roles and functions
- 2) May be useful as an employee training topic
- 3) Can be developed from a variety of sources



The safety managers of each mode are responsible for the competency of their employees and compliance with their individual Training Plans. The specific mode Training Plan must discuss what tools will be used to measure the competency of the personnel. Some examples are:

- Written test
- OJT test
- Exercises

6.1.3 Hazardous Materials Training

Sun Metro is fully aware of the importance of employee chemical safety programs and the duty to comply with legally mandated hazardous materials rules and regulations. To this end, Sun Metro has implemented a materials acceptance/rejection program to monitor and control chemicals, which are brought onto Sun Metro property to be used by employees.

Sun Metro's Hazard Communication Program (rev 0) Hazard Communication Program. Sun Metro's Hazard Communication Program covers the procurement, receipt, storage, and disposal of hazardous materials. It also documents the maintenance of Safety Data Sheet (SDS) binders and employee training.

Hazardous waste/chemical safety inspections are included in the responsibilities for safety inspections. Sun Metro has contracted the services of a properly licensed hazardous waste contractor for the removal of hazardous materials. When necessary, consultants may be hired for special projects such as indoor air quality, chemical vapor, and particulate sampling.

The Safety Manager by Mode reserves the right to reject a product if it is deemed either too hazardous for employee use or if Sun Metro is unable to provide adequate safeguards or protection.

6.1.4 Drug and Alcohol Program / Training

Sun Metro is certified as a drug-free workplace and complies with all provisions of the U.S. Department of Transportation, Federal Transit Administration, 49 CFR Part 655, Prevention of Alcohol Misuse in Transit Operations, and 49 CFR Part 40 Procedures for Transportation Workplace Drug and Alcohol Testing Programs. All Sun Metro Transit Modes follow the Sun Metro Substance Abuse Policy dated April 1, 2018.

Covered employees will receive a minimum of 60 minutes of training on the effects and consequences of prohibited drug use and additional training on the effects of alcohol on personal health, safety, and the work environment, and on the signs and symptoms that may indicate prohibited drug use. Supervisors will, in addition to the covered employee training, receive an additional minimum of 60 minutes of training on the physical, behavioral, speech, and performance indicators of probable drug use. Supervisors will receive a minimum of an additional 60 minutes of training on the physical, behavioral, speech, and performance indicators of probable alcohol misuse.

City Human Resources, along with the Sun Metro Safety Managers and Sun Metro Human Resources Section, is responsible for administering City Policy Drug and Alcohol-Free Workplace regulations.

Drug and alcohol testing is required under the following circumstances:

- Pre-employment, including placement of an existing employee in a safety-sensitive position (drug test only)

- Reasonable suspicion that an employee has used a prohibited drug or misused alcohol
- Post-accident, following certain types of events
- Random testing for safety-sensitive personnel
- Return to duty following completion of the drug/alcohol rehabilitation program
- Follow-up testing for employees who have sought and completed a treatment program

Under the FTA drug testing regulations for employees in safety-sensitive positions, laboratory tests on urine specimens are conducted for five types of drugs or their metabolites. These drugs are:

- Marijuana
- Cocaine
- Phencyclidine (PCP)
- Amphetamines (e.g., racemic amphetamine, dextroamphetamine, and methamphetamine)
- Opiates (e.g., heroin, morphine, codeine)

Sun Metro assists city employees with personal or related problems that could affect job performance through the Employee Assistance Program. On-site contractors working in Safety-Sensitive positions on Sun Metro property or ROW must have a drug and alcohol policy that complies with DOT guidelines.

The following positions fall under the definition of Safety Sensitive:

Operations

- Transit Operator Operate Revenue Service Vehicles*
- Transit Operator / Trainee Operate Revenue Service Vehicles*
- Transit Supervisor Controls Movement of Revenue Service Vehicles*
- Communication Dispatcher Controls Movement of Revenue Service Vehicles*
- The Transit Chief Safety Officer or SMS Executive manages the Safety and security of the Streetcar
- Chief Streetcar Officer Manages Streetcar Operations
- Assistant Director of Operations Manages Transit Operations
- Transit Superintendent of Operations Manages Transit Operations
- Transit Assistant Superintendent of Operations Manager Transit Operations

Maintenance

- Transit Fleet Service Supervisor: Maintain Revenue Service Vehicles
- Fleet Service Worker: Maintain Revenue Service Vehicles
- Fleet Services Assistant: Maintain Revenue Service Vehicles
- Fleet Maintenance Supervisor: Maintain Revenue Service Vehicles
- Fleet Maintenance Chief: Maintain Revenue Service Vehicles

- Fleet Maintenance Lead Technician Maintain Revenue Service Vehicles
- Fleet Maintenance Technician: Maintain Revenue Service Vehicles
- Electronics Lead Technician Maintain Revenue Service Vehicles
- Electronics Technician Maintain Revenue Service Vehicles
- Fleet Body Shop Supervisor: Maintain Revenue Service Vehicles
- Fleet Body Shop Technician/Lead Tech Maintain Revenue Service Vehicles
- Fleet Maintenance Trainer Supervisor Maintain Revenue Service Vehicles
- General Services Worker: Maintain Revenue Service Vehicles
- Streetcar Hostler Maintain Streetcar
- Streetcar Maintenance Technician: Maintain Revenue Service Vehicle
- Streetcar Maintenance Supervisor Manages Streetcar Revenue Service Vehicles

*Vehicles refer to either a bus or a streetcar

6.1.5 Recordkeeping

All Sun Metro employees' training records are maintained by the corresponding modes (Streetcar, Fixed Route, and Paratransit)

Contractor training records are kept by following the individual companies' policies. However, these records must be available to Sun Metro at any time for inspection or audit.

6.2 Training and Communication

Sun Metro is committed to equipping all employees with the knowledge and tools necessary to identify and report safety concerns as part of our Safety Management System (SMS). To achieve this, Sun Metro provides specialized training on safety concern identification and reporting to ensure compliance with 49 CFR § 673.29(a).

Training Objectives:

- Educate employees on how to recognize potential safety hazards and concerns within their scope of work.
- Provide clear instructions on the procedures for reporting identified safety concerns through established channels (e.g., safety hotline, supervisor reports, or digital reporting tools).
- Reinforce the importance of proactive safety concern reporting to reduce risks and prevent incidents.

Training Components:

1. Hazard Identification Basics:

- Recognizing unsafe conditions, acts, or system vulnerabilities.
- Examples of common hazards in transit operations and maintenance environments.

2. Reporting Protocols:

- How to submit safety concerns through Sun Metro's incident reporting system.

- Understanding confidentiality protections and Sun Metro's commitment to a non-punitive reporting environment.
- 3. **Follow-Up Processes:**
 - Overview of how the Safety Risk Management (SRM) process addresses reported concerns.
 - Examples of corrective actions taken in response to employee-reported safety issues.

Training Schedule:

- Initial training is provided during employee onboarding.
- Annual refresher courses for all staff, with additional sessions for supervisors and managers.
- Ongoing communication through safety bulletins, toolbox talks, and committee meetings.

Performance Metrics:

- An increase in the number of safety concerns reported annually indicates improved employee engagement in hazard identification.
- Reduced response times for addressing and mitigating reported hazards.

6.3 Safety Communication:

At Sun Metro communication program goals are:

- Conveys information on hazards and safety risks relevant to Sun Metro employees and contractors' roles and responsibilities.
- Informs Sun Metro employees & and contractors of safety actions taken in response to reports submitted through the Sun Metro employee safety reporting program

Safety communication IS data sharing. This data sharing happens in several ways:

- Sharing data with compliance authorities;
- Sharing data with other service providers; and
- Sharing data with employees and contractors.

Safety communication has significant implications for safety culture and transparency. You might even say that transparency is simply how much information you communicate.

These are important points because the term "safety communication" does not quite capture the fact that what we are talking about is:

- The type of safety culture management practices;
- The type of relationship management it has with front-line employees and other organizations, and
- How much trust does management have in employees?

Some best practices for communicating safety are:

- Having very clear internal rules or guidelines on role-based access to data – i.e., who can see what;
- Having many ways of implicitly and explicitly communicating data, such as:
 - Implicit: an issue manager that displays reported issue summaries;
 - Explicit: Sending out monthly newsletters
- Be as transparent with safety information as possible, as sharing too little or too much can hurt your safety culture.

At Sun Metro, safety communication will be implemented using the following tools to spread information throughout the system.

- Monthly Safety Meetings: Participation in this meeting is **mandatory** for all employees and supervisors. This meeting is led by the Mode Safety Manager and the CSO. The monthly safety meeting will be the forum where employees will be kept informed of how Sun Metro is managing the hazards and what mitigating actions are being implemented.
- Maintenance safety toolbox: This is a monthly meeting of the maintenance staff to discuss safety issues and also present the monthly safety video for maintenance.
- Toolbox: The supervisors will perform toolbox meetings to discuss any new train orders, rules, or SOPs. These toolboxes are documented by the supervisor.
- Job briefings: Every time non-routine work is performed, a job briefing is held to discuss the hazards associated with the task.
- Safety Boards: Each mode will develop and keep updating a billboard that will be used to communicate with the employees. The billboard must be kept up to date by the Safety Manager of the mode.

Additionally, the safety committees will play a key role in fostering a cooperative approach to hazard mitigation. Information discussed within the safety committees, including actions taken to mitigate hazards or address safety concerns, will be shared with employees using safety boards and safety monitors. These tools ensure transparency and keep employees informed about ongoing safety efforts and committee decisions.



Sun Metro Bulletin Art.

6.3.1 Safety Committees

Sun Metro uses a multi-stakeholder approach to the Safety meetings, where every Sun Metro division is involved, along with any external agency that has a direct or indirect impact on transit operations. The Fire/Life Safety Committee (FLSC) is comprised of the following agencies:

- Sun Metro
 - Safety and Security
 - Fixed Route
 - Paratransit and Streetcar
- City Departments
 - Police
 - Fire
 - Streets and Maintenance
 - Risk Management
- UTEP
- TxDOT

The Sun Metro Fire/Life Safety Committee (FLSC) consists of a representative of every department and external agency. This committee meets every quarter.

The Division's Safety Committees are headed by a Transit Safety Officer or Mode Safety Manager and a manager of the division. They will be the front-line eyes and ears of Sun Metro Safety Division. In Sun Metro, there will be the following safety committees:

- Facility & Vehicle Maintenance
- Operations
- Streetcar

The FLSC committee meets every quarter and is used to address the following:

- Bring specific concerns to the attention of the CSO.
- Ensure that all major events, hazards, and internal safety issues are reviewed and resolved.
- Conduct internal safety reviews and inspections.
- Report unacceptable hazardous conditions to Sun Metro executive management as soon as possible.
- Work with modal operations and maintenance staff daily to ensure all System Safety Program requirements are being implemented and Program goals and objectives are being achieved.
- Develop Corrective Action Plans (CAP) that result from safety event investigations, hazard analyses, safety reviews, and audits, and track corrective actions through fruition to ensure all identified deficiencies are adequately eliminated or controlled.
- Ensure the Accountable Executive, CSO or SMS Executive, Mode Safety Managers, and other upper management personnel are immediately notified of hazards of imminent danger or as other problems are identified or arise.
- Ensure recommendations are followed up on and corrected
- Review findings and comprehensive reports with recommendations, findings, and actions that cannot be resolved by staff. Develop action plans and monitor the implementation of any corrective action plan pursuant to any reports and recommendations
- Review, approve, or recommend changes to the reports and corrective action plans, prepared by the Committee for safety hazards and threat and vulnerabilities audit findings and corrective actions, prior to submittal of the final reports to the responsible parties for implementation
- Review, approve, or recommend changes to corrective action plans that are developed in response to recommendations of the TxDOT.
- Review, approve, or recommend changes to the annual reports of the internal safety review process required for submission to the TxDOT.
- Review, approve, or recommend changes to Sun Metro's safety rules and procedures established to implement the requirements and programs defined in the PTASP.

Under **49 CFR 673.19(b)**, the new ruling for the Public Transportation Agency Safety Plan (PTASP) includes specific provisions for the establishment and structure of a **Labor-Management Safety Committee (LMSC)**. The following points highlight Sun Metro's compliance with these requirements:

- 6.2.1.1 Equal Representation of the LMSC:** The LMSC at Sun Metro must consist of an **equal number of frontline transit worker representatives and management representatives**. This ensures that both groups have balanced input into safety-related decision-making and discussions.
- 6.2.1.2 Frontline Transit Worker Representation:** The frontline representatives on the LMSC will represent **major transit service functions**, such as operations and maintenance, from across the entire transit system. This diverse representation ensures that the safety concerns of all key functional areas are addressed in the committee's work.
- 6.2.1.3 Civil Service Representation:** Sun Metro transit workers are represented by the Civil Service, and they are not represented by a labor organization with bargaining rights with the City of El Paso. As a result, the LMSC reflects the unique organizational structure of Sun Metro.
- 6.2.1.4 Mechanism for Selecting Frontline Transit Worker Representatives:** To ensure fair representation, Sun Metro has adopted a **mechanism for selecting frontline transit worker representatives** for the LMSC. Annually, all frontline employees are asked if they are interested in the LMSC. Those who express interest will be appointed to the committee. This allows frontline employees from different service functions to participate in the committee and advocate for safety improvements within their areas of expertise. Committee members are compensated while participating in the LMSC.

Purpose of the LMSC: The LMSC plays a critical role in ensuring continuous communication between Sun Metro management and frontline workers regarding safety issues, concerns, and improvements. It supports the **Safety Management System (SMS)** by incorporating the input of employees who have firsthand experience with daily transit operations and maintenance activities.

Procedures:

The Labor-Management Safety Committee (LMSC) at Sun Metro is designed to align with the new ruling under **49 CFR 673.19(c)**, focusing on organizational structure, composition, responsibilities, operations, and procedures. The following outlines the compliance strategy:

6.3 Documentation of LMSC Composition, Responsibilities, and Operations:

Sun Metro has established detailed documentation of the LMSC's **composition, responsibilities, and operations** in accordance with the following provisions:

- **Organizational Structure:**
The LMSC reports directly to the **Accountable Executive** and works within the Safety Management System (SMS) framework. The committee is part of Sun Metro's organizational structure aimed at enhancing transit safety through collaborative input from management and frontline workers.
- **Size and Composition:**
The committee consists of an **equal number of management representatives and frontline transit worker representatives**, with frontline workers representing key service functions such as operations and maintenance. This balance ensures that both management and workers' perspectives are considered in all safety discussions and decisions. The members are selected using a mechanism designed by Sun Metro, in accordance with its policy on Civil Service representation.
- **Committee Leadership:**
The LMSC is **chaired by a designated management representative**, with a frontline worker representative serving as **vice-chair**. This leadership structure ensures that both management and employees play active roles in guiding the committee's efforts and addressing safety issues.

6.3.1 Meeting Procedures and Record Keeping:

- **Development and Sharing of Meeting Agendas and Notices:**
Agendas for LMSC meetings are developed collaboratively by the chair, vice-chair, and committee members. Agendas are distributed to all members in advance of each meeting, along with a **meeting notice** that includes the time, location, and topics to be discussed. This information is shared through Sun Metro's internal communication channels, such as email, bulletin boards, and digital workplace platforms, ensuring transparency and preparedness.
- **Recording and Maintenance of Meeting Minutes:**
The LMSC will ensure that **meeting minutes** are taken at each session, detailing the key points of discussion, decisions made, and action items. These minutes are reviewed by the committee for accuracy and then maintained in a centralized, secure digital archive. They are made available to all LMSC members and key stakeholders and are used as a reference for tracking progress and accountability.

6.3.2 Training for Safety Committee Members:

Sun Metro provides **regular training for LMSC members**, ensuring that they are equipped with the necessary knowledge and skills to support the agency's Safety Management System (SMS). This training includes:

- **Safety Management System (SMS) Fundamentals:**
Training on SMS principles, including hazard identification, risk assessment, and safety assurance processes.
- **Roles and Responsibilities:**
Detailed training on the roles and responsibilities of LMSC members, emphasizing how their input contributes to system-wide safety improvements.
- **Collaborative Safety Practices:**
Training on how to facilitate open communication, resolve conflicts, and engage in constructive problem-solving during LMSC meetings.

Training is updated as necessary to reflect changes in safety standards, operational practices, or regulatory requirements. The training program supports Sun Metro's SMS by ensuring committee members are active, informed participants in safety initiatives.

6.3.4 Policy for Participation in the LMSC:

Sun Metro has implemented a **policy for participation in the LMSC**, which includes clear guidelines on:

- **Attendance Requirements:**
Committee members are expected to attend all scheduled meetings and actively participate in discussions and decision-making processes.
- **Engagement and Contributions:**
All members, whether representing management or frontline workers, are encouraged to contribute openly and honestly, sharing insights based on their roles and experiences. Members are also responsible for bringing forth safety concerns from their respective areas for the committee's consideration.
- **Accountability:**
To maintain the integrity of the LMSC, Sun Metro tracks members' participation and contribution, and attendance records are documented as part of the meeting minutes.

6.3.5 Access to Technical Experts, Information, and Safety Reporting Program Submissions:

- **Access to Technical Experts:**
The LMSC may, as necessary, access **technical experts** both within and outside Sun Metro, including transit workers, to provide insight on specialized safety issues. These experts may serve in an **adversary or consultative capacity**, depending on the nature of the safety matter under review, and are brought in to offer objective assessments of risks or procedures.

- **Access to Sun Metro Information, Resources, and Tools:**
The LMSC has access to Sun Metro's internal **safety information, resources, and tools**, such as data from operations, maintenance records, safety audits, risk assessments, and event reports. This access ensures that the committee has the necessary context and information for informed decision-making.
- **Access to the Safety Reporting Program:**
The committee reviews submissions made through **Sun Metro's transit worker safety reporting program** to support its deliberations. This enables the LMSC to address concerns raised by employees and use this information to assess ongoing safety risks and evaluate safety trends across the system.

6.3.6 Decision-Making and Recording:

- **Decision-Making Process:**
The LMSC operates on a **consensus-based decision-making process** whenever possible. When consensus cannot be reached, the committee will hold a vote, with an equal number of votes allocated to both frontline transit worker representatives and management representatives.
- **Recording of Decisions:**
All decisions, whether reached by consensus or vote, will be **recorded in the meeting minutes**, along with any action items or follow-up responsibilities assigned to specific members. These decisions will be maintained in Sun Metro's safety management archives and are subject to review as necessary.

6.3.7 Coordination and Communication with the Mass Transit Board and the Accountable Executive:

- **Accountable Executive's Role:**
The **Accountable Executive** is an active member of the LMSC, participating directly in the committee's deliberations, offering guidance, and ensuring alignment with Sun Metro's overall safety goals. This ensures that senior leadership remains closely involved in frontline safety efforts.
- **Coordination with the Mass Transit Board:**
The Accountable Executive provides regular updates to the **Mass Transit Board** regarding the status of safety initiatives, safety performance trends, and committee decisions. These updates may include written reports, presentations, and progress on action items derived from LMSC meetings. Coordination is facilitated through the Accountable Executive, who ensures that the Board is informed and engaged with the committee's work.

6.3.8 Dispute Resolution:

- Dispute Management:**
 To ensure that the LMSC can continue its operations effectively, Sun Metro has established a procedure for resolving disputes within the committee. If disagreements arise that cannot be resolved internally, the issue will be escalated to the **Accountable Executive** for mediation. In cases where further resolution is needed, Sun Metro will seek input from the **Mass Transit Department Board** or external safety experts to ensure that operations proceed without disruption.

6.3.9 Review and Approval of PTASP

- PTASP Review and Approval:**
 The LMSC is responsible for reviewing and approving Sun Metro's **Public Transportation Agency Safety Plan (PTASP)** and any subsequent updates, as required by **§ 673.11(a)(1)(i)**. The committee conducts an annual review of the PTASP, ensuring it reflects any changes in operations, risk environments, or regulatory requirements. To demonstrate the safety committee's approval of the ASP, meeting minutes with the approval date will be provided separately from the PTASP document. The Accountable Executive will sign off on the final version of the PTASP before submission to the **Mass Transit Board** for final approval.

6.3.10 Setting Annual Safety Performance Targets:

- Annual Safety Performance Targets:**
 Sun Metro, with input from the LMSC, will set **annual safety performance targets** as part of its **safety risk reduction program**, in accordance with **§ 673.11(a)(7)(iii)**. These targets are developed based on safety data, risk assessments, and transit worker safety reporting program insights. The committee will track the progress of these targets and assess the effectiveness of risk mitigation measures throughout the year.

6.3.11 Identifying and recommending Mitigations:

- Sun Metro, with the input of the LMSC, will be responsible for **identifying and recommending mitigations** to reduce the likelihood and severity of risks identified in the agency's safety risk assessment, especially where safety performance targets were not met in accordance with 673.19(d)(3)(i). All mitigations are identified and mitigated, and recommended by the safety committee incorporated by reference in the ASP.

6.3.12 Continuous Improvements:

- To support continuous improvement per **§ 673.27(d)**, the Safety Committee will **identify safety deficiencies** by regularly reviewing safety event data, safety audits, and feedback from staff. This includes pinpointing any areas where the transit

agency has not met annual safety performance targets. By addressing these deficiencies, the Committee can recommend adjustments to improve safety measures, ensuring that risk reduction efforts are effective and aligned with performance goals.

7 Emergency Preparedness and Response Plan

Major events such as accidents, fires, floods, violent crime, and terrorist attacks present significant challenges for public transit agencies. To successfully manage these events, personnel from multiple disciplines and agencies work together to promote the highest level of safety and to execute tasks such as perimeter control, rescuing or evacuating passengers, supporting the transportation of emergency responders and equipment, managing victims and their families, controlling crowds, repairing facilities, communicating with the media, and restoring service.

Sun Metro management recognizes that safety, security, and emergency preparedness encompass not only the system, including employees, facilities, passengers, and operations, but also the local responders, planning organizations, and mutual aid partners within the communities it serves. Sun Metro has developed a coordinated emergency response program and a schedule of planned activities and exercises that encompasses local emergency responders and relevant planning agencies, and establishes a working partnership that allows all entities to work together to identify vulnerabilities that may impact our respective ability to respond and recover from a major emergency event. This effort is a continuous process that employs four integral functions: planning, inter-agency coordination, training, and exercises.

7.1 Planning

7.1.1 Sun Metro Emergency Preparedness and Continuity Plan

Sun Metro has a comprehensive System Security and Emergency Preparedness Plan (SSEPP). The SSEPP guides all activity and response during a system emergency or community event.

Sun Metro maintains Facility Emergency Plans for the following:

- Building Evacuation – General
- Fire
- Medical Emergencies
- Elevator Emergencies
- Bomb threats
- Biohazards or suspicious items
- Hazardous Materials Spills
- Workplace violence

- Other emergency conditions

7.2 Responsibilities for Emergency Preparedness

Sun Metro has adopted the Incident Command System (ICS) structure to respond to and manage an emergency event. The ICS's Primary and Secondary Management functions and responsibilities are shown below.

ICS Management Functions

ICS Management Function	Responsible Party
Command	Assistant Director of Streetcar Operations
Safety & Security	Streetcar Safety Manager, Chief Safety Officer, or SMS Executive.
Operations	Streetcar Operation Superintendent or Transit Supervisor
Technology	Sun Metro IT
Planning	Sun Metro Planning
Logistics	Streetcar Operation Superintendent or Transit Supervisor
Finance	Chief Financial Officer and Accountable Executive
Public Information	Sun Metro Marketing and City PIO

7.2.1 Crisis Communications Plan

A crisis is a sudden, unexpected event or set of circumstances that requires immediate action. For this reason, Sun Metro has a Crisis Communications Plan that allows the organization to deal with each situation at hand and be prepared to communicate under crisis conditions. The Crisis Communications Plan allows the organization to go from a position of response and reaction to one of relative control.

A key step in preparing for a crisis is selecting a team of employees who formulate and implement Sun Metro's response. The Crisis Communications Team assumes responsibility for handling the response so that other employees can maintain normal functions of the office with as few disruptions as possible.

Below are the core team members responsible for formulating Sun Metro messages during a crisis:

- Mass Transit Director – Sun Metro
- Sun Metro's Assistant Director of Operations
- Mass Transit Chief Safety Officer or SMS Executive
- Safety Managers by Mode
- Sun Metro Manager by mode
- *Others are notified depending on the severity of the crisis

7.3 Coordinated Schedule

7.3.1 Interdepartmental / Interagency Coordination

Sun Metro's Managing Director, Chief Safety Officer, or SMS Executive, and Department Managers will coordinate the schedule for emergency preparedness exercises; development of After-Action Reports and implementation of findings; procedure development, and training with the stakeholder agencies.

In the table below are the major federal, state, and local agencies and their primary responsibility to Sun Metro's safety and emergency preparedness.

Table 9: Federal, State, and Local Agencies' Primary Responsibilities

Agency	Reporting	Oversight	Support	Policy
Federal Transit Administration	X	X	X	X
Texas Department of Transportation	X	X	X	X
Transportation Security Agency	X	X	X	X
Department of Homeland Security		X	X	
El Paso Police Department	X		X	
El Paso Fire Department	X		X	
Emergency Management Office	X		X	
• El Paso Public Works	•	•	X	•
• City Attorney's Office	•	•	X	•

7.4 Emergency Drills and Exercises

Sun Metro, EPSC/ FLSC conducts or participates in a minimum of one Full Scale Exercise (FSE) or Tabletop Exercise (TTX) annually. Community first responders, including the El Paso Fire Department, El Paso Police Department, local FBI, TxDOT, and El Paso Emergency Management, may assist the transit system in planning, coordinating, and training to prepare for the drills and Exercises.

Detailed scenarios are developed by the participants' management to ensure that the exercises are realistic, comprehensive, and effectively evaluate the emergency preparedness of the participants. Observers are assigned to each participant group to evaluate the effectiveness of the response to the exercise scenario.

After actual safety events, there is an assessment to return the system to 100% functionality in the shortest time possible. All divisions are responsible for executing this plan. The purpose of this phase is to make certain that all areas have been addressed appropriately and Sun Metro can sustain operations indefinitely. This phase is a self-assessment to determine ways to improve our processes and procedures and update all disaster-related plans. The following are examples of items that will be reviewed during this process:

- Division managers will provide the records to support all expenses associated with the emergency.

- Each division will provide an update on the status of personnel, equipment, and facilities.
- Division managers should provide a list of proposed changes to the comprehensive System Security & Emergency Preparedness Plan (SSEPP) to Sun Metro's Safety Managers.
- Division managers should follow the SSEPP to achieve 100% functionality in their assigned area.
- Division managers will identify any shortfalls or limiting factors that will prevent them from achieving 100% functionality.
- Emergency supplies and equipment used during an emergency will be replenished.

Immediately after the completion of an exercise, the participants will debrief and discuss the observations made during the exercise. An after-action report is prepared and distributed to the participants for follow-up with each participant group. The after-action report is used to determine the need for modifications to plans, procedures, and processes. The Sun Metro FLSC performs follow-up with all participant groups to develop a coordinated schedule for the implementation of corrective actions for the closure of identified after-action items. These corrective actions will be submitted to TxDOT and included in the Corrective Action Plan. The Chief Safety Officer or SMS Executive and the corresponding safety manager will be responsible for the implementation of these CAPs.

7.5 Emergency Procedures

Emergency Response Procedures are reviewed and revised in accordance with Sun Metro Plans, Manuals, Policies, and Procedures. This procedure stipulates control and distribution, including the three-year review process. The length of time needed for the review may vary based on the document being reviewed, but the review should not exceed 30 days.

7.5.1 Emergency Preparedness Training

Employees receive emergency training during their initial indoctrinations. In addition, all employees receive training to respond to specific emergencies in accordance with the appropriate Standard Operating Procedures.

7.6 Familiarization Training

All fire department personnel have been provided familiarity training on Sun Metro buses and the streetcar system. All new fire department and emergency medical department recruits are provided with classroom training and hands-on training on emergency preparedness for the Sun Metro system. The Safety and Security Division provided train-the-trainer instruction.

8 Risk-Base Inspections

On November 15, 2021, President Biden signed the Bipartisan Infrastructure Law (BIL), enacted as the Infrastructure Investment and Jobs Act (IIJA), which continues the public transportation safety program. The BIL amended 49 U.S.C § 5329 to require state safety

oversight agencies (SSOAs) to conduct risk-based inspections (RBI) of the rail transit agencies (RTAs) they oversee. Additionally, the BIL directed the Federal Transit Administration (FTA) to issue a Special Directive to each SSOA on developing and implementing risk-based inspection programs.

On October 21, 2022, the FTA issued Special Directive 22-47, under the authority of 49 U.S.C. § 5329 (k) and 49 CFR Part 670, requiring the Texas Department of Transportation (TxDOT), as the SSOA, to develop and implement a risk-based inspection program utilizing qualitative and quantitative data analysis to prioritize inspections addressing safety concerns and hazards associated with rail transit agency safety risks.

Special Directive 22-47 mandates that TxDOT have an FTA-approved risk-based inspection program by October 2024. Through the RBI Toolkit, the FTA requires SSOAs to submit their risk-based inspection programs for FTA review and approval by May 2024.

To meet this deadline, TxDOT, in consultation with each rail agency within the SSO Program, began developing a risk-based inspection program in April 2023. TxDOT SSO and rail agencies have continued to coordinate the development of the RBI program throughout 2023 and 2024 via onsite visits, conference calls, emails, and document reviews.

The Risk-Based Inspection Program documents TxDOT SSO's policies and procedures addressing TxDOT's authority and capability to enter and conduct inspections of the rail agencies, including both scheduled and unscheduled inspections. These policies and procedures also cover inspection access and data collection from each RTA to support risk-based inspection monitoring and prioritization activities, including the data the RTA collects when identifying and evaluating safety risks.

TxDOT will submit the risk-based inspection program to the FTA by May 2024. The RBI Program will be reviewed annually as part of the Program Standard update process and updated if necessary.

El Paso Streetcar (EPSC), in consultation and coordination with TxDOT, began developing the risk-based inspection program in April 2023. EPSC and TxDOT have continued RBI-related consultation and coordination throughout 2023 and 2024 via onsite visits, conference calls, emails, and documentation reviews.

The TxDOT SSO RBI Program outlines TxDOT's authority to assess rail agency property and conduct inspections, including access for both scheduled and unscheduled inspections. Additionally, the RBI Program details the policies and procedures for conducting these inspections.

Upon FTA approval of the TxDOT SSO RBI Program, EPSC will formally adopt and incorporate the RBI Program into the Public Transportation Agency Safety Plan (PTASP) as Appendix D.

Risk-Based Inspections evaluate compliance with roadway worker protections through:

- Field inspections of work zones
- Verification of redundant protections
- RWIC qualification validation
- PPE usage assessments
- Communication logs between RWIC and OCC
- Track condition hazards affecting roadway workers
- Post-work site restoration checks
- Review of job safety briefing documentation

Inspections are prioritized based on:

- Time of day
- Type of work
- Traffic volume
- Historical safety performance
- Near-miss data

All findings must be included in the Safety Inspection Log and reviewed as part of Safety Assurance processes.

The RBI Program will be reviewed annually as part of the PTASP update process.

Appendices

A. Mass Transit Department Board Approval Resolution

B. TxDOT Approval Letter

C. Configuration Management Plan

D. Risk-Base Inspections



Legislation Text

File #: 26-0033, **Version:** 1

**CITY OF EL PASO, TEXAS
LEGISTAR AGENDA ITEM SUMMARY FORM**

DISTRICT, DEPARTMENT, CONTACT INFORMATION:

Please choose District and Department from drop down menu. Please post exactly as example below.

No Title's, No emails. Please use ARIAL 10 Font.

All Districts

Sun Metro Mass Transit, Anthony R. DeKeyzer, (915) 212-3306

Sun Metro Mass Transit, Jerry DeMuro, (915) 212-3470

AGENDA LANGUAGE:

This is the language that will be posted to the agenda. Please use ARIAL 11 Font.

For Notation Only: Notice of Sun Metro's Title VI Program update. The program update was prepared in accordance with the requirements specified in the Federal Transit Administration (FTA) Circular 4702.1b, "Title VI requirements and Guidelines for Federal Transit Administration Recipients."

**CITY OF EL PASO, TEXAS
AGENDA ITEM
DEPARTMENT HEAD'S SUMMARY FORM**



DEPARTMENT: Sun Metro

AGENDA DATE: 1/6/26

PUBLIC HEARING DATE:

CONTACT PERSON NAME: Anthony R. DeKeyzer

PHONE NUMBER: 915-212-3306

2nd CONTACT PERSON NAME: Jerry DeMuro

PHONE NUMBER: 915-212-3470

DISTRICT(S) AFFECTED: All Districts

STRATEGIC GOAL:

7.0 - Enhance and Sustain El Paso's Infrastructure Network

SUBGOAL:

7.3 - Enhance a Regional Comprehensive Transportation System

SUBJECT:

FOR NOTATION ONLY: Notice of Sun Metro's Title VI Program update. The program update was prepared in accordance with the requirements specified in the Federal Transit Administration (FTA) Circular 4702.1b, "Title VI requirements and Guidelines for Federal Transit Administration Recipients."

BACKGROUND / DISCUSSION:

Under the Civil Rights Act of 1964, and as a recipient of federal funding under the programs of the Federal Transit Administration (FTA) of the U.S. Department of Transportation (USDOT), Sun Metro has an obligation to ensure that the level and quality of Sun Metro's fixed route and demand response services are provided in a nondiscriminatory manner and that the opportunity for full and fair participation is offered to Sun Metro's riders and other community members. The Title VI Program update is submitted every triennial.

COMMUNITY AND STAKEHOLDER OUTREACH:

N/A

PRIOR COUNCIL ACTION:

According to FTA regulations, the Title VI Program is updated every three years. The last update was presented to the Mass Transit Department Board on January 18, 2023.

AMOUNT AND SOURCE OF FUNDING:

N/A

REPORTING OF CONTRIBUTION OR DONATION TO CITY COUNCIL:

N/A

NAME	AMOUNT (\$)

*****REQUIRED AUTHORIZATION*****

DEPARTMENT HEAD:

Jerry DeMuro

Digitally signed by Jerry DeMuro
Date: 2025.11.26 13:33:51 -07'00'

(If Department Head Summary Form is initiated by Purchasing, client department should sign also)

2025 Title VI Program Update



October 1, 2025
10151 Montana Ave.
El Paso, Texas 79925
(915) 212-3300
sunmetro.net



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Sun Metro's Profile

The City of El Paso's Mass Transit Department, Sun Metro, provides public transportation services for more than 5 million passengers a year within its 258 square-mile service area. SM's services include fixed route, rapid transit, paratransit, and streetcar. As a border city, El Paso is the largest bi-national metropolitan area in the world. Respectively, SM's service is unique among the nation's transportation agencies.

Sun Metro's Mission Statement

Sun Metro's mission is to connect our El Paso community through high quality transit services.

Sun Metro's Title VI Report Purpose

The purpose of the Title VI Program Update is to document the steps Sun Metro has taken and will take to ensure that Sun Metro provides services without excluding or discriminating against individuals on the basis of race, color, and national origin. Additionally, Sun Metro will take steps to ensure that our programs and activities do not exclude or discriminate against low-income individuals or other classes protected by Federal or State law.

Contact Information:

Jerry DeMuro
Deputy Transit Officer
City of El Paso, Sun Metro
(915) 212-3470
DeMuroG@elpasotexas.gov

Introduction

Sun Metro's Commitment to Civil Rights

This update of Sun Metro's Title VI Program has been prepared to ensure that the level and quality of Sun Metro's fixed route and demand response services are provided in a nondiscriminatory manner and that the opportunity for full and fair participation is offered to Sun Metro's riders and other community members.

Additionally, through this program, Sun Metro has examined the need for services and materials for persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. While it is a matter of principle that Sun Metro is committed to ensuring that no person is excluded from participation in, or denied the benefits of, or subjected to discrimination in the receipt of any of Sun Metro's services on the basis of race, color or national origin, the contents of this program have been prepared in accordance with Section 601 of Title VI of the Civil Rights Act of 1964 and Executive Order 13116 (Improving Access to Services for Persons with Limited English Proficiency).

"No person shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal assistance."

-Civil Rights Act of 1964

Under the Civil Rights Act of 1964, and as a recipient of federal funding under the programs of the Federal Transit Administration (FTA) of the U.S. Department of Transportation (USDOT), Sun Metro has an obligation to ensure that:

- The benefits of its public transit services are shared equitably throughout the service area;
- The level and quality of public transit services are sufficient to provide equal access to all riders in its service area;
- No one is precluded from participating in Sun Metro's service planning and development process;
- Decisions regarding service changes or facility locations are made without regard to race, color or national origin and that development and urban renewal benefitting a community as a whole not be unjustifiably purchased through the disproportionate

allocation of its adverse environmental and health burdens on the community's minority population; and

- A program is in place to correct any intentional or unintentional discrimination.

The Federal Transit Administration (FTA) Circular 4702.1B, "Title VI Requirements and Guidelines for Federal Transit Administration Recipients," effective October 1, 2012, requires that all FTA recipients operating 50 or more fixed route vehicles during peak service and serving a population of 200,000 or greater must evaluate service changes and their corresponding impacts on transit services to determine whether the planned changes will have a disparate impact on the basis of race, color, national origin or income.

The content of the Title VI Program was approved and adopted by the Mass Transit Board on January 6, 2026.

General Requirements

This section addresses the General Requirements as described under Chapter III of FTA Circular 4702.1B.

1. Notification to Beneficiaries of Title VI Protections

Sun Metro is committed to ensuring that the public is aware of the rights and protections afforded to them under Title VI. Notice regarding Sun Metro's Civil Rights Policy has been disseminated throughout the bus system in both English and Spanish. The materials include posters displayed at transit terminals and digital notifications on buses, and on Sun Metro's website at <https://sunmetro.net/about/title-vi-and-dbe/>. Sun Metro's Title VI Policy and Civil Rights Notice (**Figure 1 & 2**), including cases (**Figure 3**) are posted at the following locations:

- Al Jefferson Westside Transit Center, 7535 Remcon Circle
- Glory Road Transit Center, 100 E. Glory Rd.
- Union Plaza Transit Terminal, 400 W. San Antonio
- Robert E. McKee Five Points Transit Center, 2830 Montana
- Bert Williams Downtown Santa Fe Transit Center, 301 S. Santa Fe
- Arves E. Jones Sr. Transit Center at Northgate, 9348 Dyer
- Arturo Tury Benavides Eastside Transit Center, 1165 Sunmount
- Upper East Side Transit Center, 12781 Edgemere Blvd
- Nestor A. Valencia Mission Valley Transit Center, 9065 Alameda

In addition, the Title VI Civil Rights Notice is publicized on all fleet vehicles, either displayed on a screen or a poster (**Figure 4**).

Figure 1: Discrimination Complaints Process Public Notice

HOW TO FILE A DISCRIMINATION COMPLAINT

If you think that The City of El Paso – Sun Metro has failed to provide these services or discriminated in another way based on race, color, national origin (including language), disability, sex, age, or religion, you can file a complaint in person or by mail with:

Sun Metro
Attn: Customer Service – Nondiscrimination
10151 Montana Ave.
El Paso, TX 79925

If you wish to file by e-mail, please call (915) 212-3333 and an appropriate e-mail address will be provided.

You can also file a civil rights complaint with the Federal Transit Administration (FTA) Office of Civil Rights:
E-mail: FTACivilRightsCommunications@dot.gov Phone: 1-888-444-4511
(with "FTA complaint form" in the subject line)

NOTICE AND FREQUENTLY ASKED QUESTIONS (FAQ) ABOUT REASONABLE ACCOMMODATIONS FOR INDIVIDUALS WITH DISABILITIES

NOTICE: The City of El Paso – Sun Metro is committed to providing individuals with disabilities an equal opportunity to participate in and benefit from Sun Metro's programs, activities, and services.

Individuals may request reasonable accommodations from Sun Metro that they believe will enable them to have such equal opportunity to participate in our programs, activities, and services.

To request reasonable accommodations, please contact Sun Metro Customer Service at (915) 212-3333, or by using the "Contact Sun Metro" link at our website www.sunmetro.net. This Reasonable Accommodations Notice can be found at all Sun Metro transit centers.

FREQUENTLY ASKED QUESTIONS (FAQ): The following FAQ provides information on requesting reasonable accommodations in Sun Metro's programs and activities.

- What is a reasonable accommodation in Sun Metro's programs?
A reasonable accommodation is a change or modification to afford a qualified individual with a disability full enjoyment of Sun Metro's programs or activities, such as modification of policies, practices, and procedures would fundamentally alter the nature of the program, service, or activity, or result in undue financial and administrative burden to Sun Metro.
- How do I request a reasonable accommodation?
If you need a reasonable accommodation, please contact Sun Metro Customer Service at (915) 212-3333, or by using the "Contact Sun Metro" link at our website www.sunmetro.net.
- Does my request for a reasonable accommodation need to be in writing?
No, you do not need to put your request in writing; however, making a written request can be helpful documentation for ensuring that Sun Metro provides the desired accommodation. In addition, you do not need to use the specific words "reasonable accommodation" when making your request.
- When should I request a reasonable accommodation?
You may request a reasonable accommodation from Sun Metro at any time. However, making the request in advance of a meeting, conference call, or call will help ensure that Sun Metro is able to fulfill the request for an accommodation. For certain requests, such as requests for sign language interpretation, Sun Metro requests at least two week advance notice.
- May someone request a reasonable accommodation on my behalf?
Yes, anyone can request a reasonable accommodation on behalf of an individual with a disability who seeks to interact with Sun Metro staff or participate in its programs or activities.
- What will Sun Metro do upon receiving my request for a reasonable accommodation?
Sun Metro may contact you to obtain more information about your request and to better understand your needs. In addition, Sun Metro may review your request to determine:
 - Whether the requested accommodation will be effective in allowing you to participate in the activity or program in which you are seeking participation;
 - Whether the requested accommodation is reasonable, or an equally effective alternative to the requested accommodation is available; and
 - Whether providing you with the requested accommodation would fundamentally alter the nature of Sun Metro's program or impose undue financial or administrative burden on Sun Metro.

In addition, in some cases, Sun Metro may consult with you in an interactive process to determine on a case-by-case basis what accommodations can be made.

If Sun Metro determines that your requested accommodation would fundamentally alter the nature of the program or impose an undue financial or administrative burden, Sun Metro may deny your request. However, in the unlikely event that this occurs, Sun Metro will work with you to identify an alternative accommodation that allows you to effectively participate in Sun Metro's program, activity, or service.

- May Sun Metro request medical documentation from you after receiving your request for a reasonable accommodation?
No, Sun Metro may not request medical documentation after receiving your request for a reasonable accommodation. Sun Metro's questions will be limited to understanding the barrier to your ability to participate in the program or activity in which you are interested and the nature of an accommodation that will remove this barrier.
- May Sun Metro charge you the cost of providing the reasonable accommodation?
No, you are not responsible for the cost of an auxiliary aid or service Sun Metro provides to you.
- What are some examples of reasonable accommodations?
There are many types of reasonable accommodations. Some examples of how Sun Metro provides reasonable accommodations include:
- Arranging for qualified sign language interpreters
- Providing on-site captioning
- Producing alternate formats of print materials in braille, large print, or in an electronic format
- Providing remote conference captioning services
- Furnishing a temporary ramp to access the bus or other areas with one or more steps to ensure accessibility for individuals who have physical disabilities and may be using a wheelchair or walker

DISCRIMINATION COMPLAINTS PROCESS

The City of El Paso – Sun Metro does not promote or tolerate discrimination. Sun Metro has established a process through which allegations of discrimination are investigated and resolved.

COMPLAINT SUBMISSION

If someone believes they have suffered from discrimination (includes race, color, sex, national origin, age, disability, religion, or genetic information) under a Sun Metro program of transit service delivery or related benefits, they may contact Sun Metro to seek an informal resolution. If the matter cannot be resolved informally, the following steps will be utilized:

- Within 180 days of the alleged discrimination, complainants may submit a written/oral complaint to Sun Metro. Complaints must include the complainant's name (aliases be listed as anonymous), the nature of the complaint, the date of the alleged discrimination, requested action, and contact information.
- Complainants may submit a complaint in-person, by mail or over-the-phone with:

Sun Metro
Attn: Customer Service – Nondiscrimination
10151 Montana Ave.
El Paso, TX 79925
(915)212-3333

If a complainant prefers to submit a complaint by e-mail, the complainant may call Sun Metro at (915)212-3333, and an appropriate e-mail address will be provided.

Complainants may also file a complaint with the FTA Office of Civil Rights:

E-mail: FTACivilRightsCommunications@dot.gov (with "FTA complaint form" in the subject line)
Phone: 1-888-444-4511

U.S. Mail:
Federal Transit Administration Office of Civil Rights
Attn: Complaint Team East Building, 5th Floor – TCR 1200
New Jersey Ave., SE Washington, D.C. 20590

- If a complainant has a disability, the complainant may obtain information about the complaint process in alternative formats such as large print, audio, or accessible electronic formats.
- If a complainant has limited English proficiency, the complainant may obtain information about the complaint process by requesting a qualified foreign language interpreter and information written in other languages to ensure meaningful access to programs and activities. If a complainant requires these services, they may contact:

David Garcia
Business and Customer Service Assistant Manager
GarciaDX3@elpasotexas.gov
(915) 212-3333

COMPLAINT REVIEW AND PROCESSING

- Sun Metro will review each complaint and may request additional information from the complainant as needed. If additional information is requested and not received, the complaint may be closed. The complaint may also be closed if the complainant no longer wishes to pursue the complaint.
- Complaints will be recorded in an electronic log maintained by Sun Metro containing the complainant's contact information, nature of the complaint, date of submission, and results of the investigation. Log will be retained on an ongoing basis, and will not be purged. Information contained in log will be considered confidential and will be stored on the City's network with access limited to Sun Metro staff designated by the Director.
- Any complaint received within the jurisdiction of Sun Metro will be promptly and impartially investigated. Sun Metro's goal is to initiate an investigation of all complaints within 25 days of receipt, though the time to conduct investigations complaints may be longer depending on the nature and complexity of the complaint.
- Note: When possible, every effort will be made to resolve a complaint informally. In a case where an informal accommodation may be made to complainant, the complainant may choose to withdraw the complaint, and the complaint will be closed and the withdrawal recorded in the log.

COMPLAINT INVESTIGATION

All complaints will be investigated promptly. Reasonable measures will be undertaken to preserve any information that is confidential. Sun Metro will review every complaint and assign a neutral party to investigate. Neutral shall mean an individual employed by Sun Metro not assigned to the particular operation in question, or a qualified individual not employed by Sun Metro. At a minimum, the investigating officer will:

- Identify and review all relevant documents, practices, and procedures;
- Identify persons with knowledge of the complaint, including but not limited to the complainant, witnesses, or any person identified by the complainant, or who may have been subject to similar activity, and provide an invitation to be interviewed in person or by phone; and
- Sun Metro will inquire whether the complainant has filed the complaint with another agency, such as FTA Office of Civil Rights, to prevent duplicate investigations. If the complainant has submitted a duplicate complaint, Sun Metro will attempt the relevant agency to cooperate and coordinate with in the investigation.

Upon completion of the investigation, Sun Metro will complete a final report summarizing the findings for the Director of Mass Transit. If a civil rights violation is found to exist, remedial steps as appropriate and necessary, will be implemented. The complainant will receive a final report that identifies any remedial actions implemented by Sun Metro in accordance with City policies and procedures. The investigation process and final report is expected to be completed within 45 days of receipt, unless exceptional circumstances warrant an extended investigation and reporting period.

PUBLIC NOTICE

Sun Metro will ensure notice is posted at all transit center locations, informing the public of its nondiscrimination policy and how to submit a complaint. The notice will also be posted in Spanish, in order to accommodate persons with limited English proficiency.



COMO PRESENTAR UNA QUEJA DE DISCRIMINACION

Si considera que La Ciudad de El Paso – Sun Metro no ha proporcionado estos servicios, o ha discriminado de cualquier otra manera por motivos de raza, color, nacionalidad (incluyendo idioma), discapacidad, sexo, edad, o religión puede presentar una queja en persona o por correo postal, a:

Sun Metro
Attn.: Servicios a el Cliente
No-discriminacion
10151 Montana Ave.
El Paso, TX 79925

Si prefiere hacer su queja por correo electronico, por favor llamar a el (915) 212-3333 y se le proporcionara un correo electronico apropiado.

También puede presentar una queja de derechos civiles ante la Oficina de Derechos Civiles de Administración Federal de Tránsito:

Correo electrónico:
FTACivilRightsCommunications@dot.gov
(incluya "FTA complaint form" en la línea de asunto)

Correo postal de EE. UU.:

Federal Transit Administration
Office of Civil Rights
Attn: Complaint Team
East Building, 5th Floor – TCR
1200 New Jersey Ave., SE
Washington, D.C. 20590

Teléfono: 1-888-444-4511

Información y servicios para personas con discapacidades o con dominio limitado del inglés

La Ciudad de El Paso – Sun Metro:

- Ofrece asistencia y servicios gratuitos, como servicio profesional de intérpretes de lengua de señas, e información escrita en otros formatos (letra grande, audio, electrónico, etc.) para permitir una comunicación eficiente con personas con discapacidades.
- Ofrece servicio gratuito de idiomas, como servicio profesional de intérpretes de idiomas extranjeros e información escrita en otros idiomas, para garantizar el acceso satisfactorio a programas y actividades para personas con dominio limitado del inglés.

Si necesita estos servicios, comuníquese con:

David Garcia, Subgerente de Empresa y Servicio a el Cliente
GarciaDX3@elpasotexas.gov
(915) 212-3333

Figure 2: Title VI Policy Public Notice



Sun Metro



Sun Metro

MAYOR
Oscar Leeser

CITY COUNCIL

District 1
Brian Kennedy

District 2
Alexandra Annello

District 3
Cassandra Hernandez

District 4
Joe Molinar

District 5
Isabel Salcido

District 6
Art Fierro

District 7
Henry Rivera

District 8
Chris Canales

CITY MANAGER
Tommy Gonzalez

DATE: May 13, 2023

FROM: Anthony DeKeyzer, Director of Mass Transit, Sun Metro

SUBJECT: POLICY AND NOTICE OF NONDISCRIMINATION

The City of El Paso – Sun Metro complies with Federal civil rights laws and is committed to providing its programs and services without discrimination in accordance with:

- Title VI of the Civil Rights Act of 1964, which prohibits discrimination based on race, color, or national origin (including language).
- Section 504 of the Rehabilitation Act of 1973, which prohibits discrimination based on disability.
- Title IX of the Education Amendments Act of 1972, which prohibits discrimination based on sex in education programs or activities.
- Age Discrimination Act of 1975, which prohibits discrimination based on age.
- U.S. Department of Homeland Security regulation 6 C.F.R. Part 19, which prohibits discrimination based on religion in social service programs.

It is against the law for The City of El Paso – Sun Metro to retaliate against anyone who takes action to oppose discrimination, files a grievance, or participates in the investigation of a grievance in accordance with the above authorities.

NORMA Y NOTIFICACIÓN DE AVISO DE NO DISCRIMINACIÓN

The City of El Paso – Sun Metro cumple con las leyes federales de derechos civiles y está comprometido a proporcionar programas y servicios libres de discriminación, de conformidad con:

- Título VI de la Ley de Derechos Civiles de 1964, que prohíbe la discriminación basada en la raza, color, o nacionalidad (incluido el idioma).
- Artículo 504 de la Ley de Rehabilitación de 1973, que prohíbe la discriminación basada en la discapacidad.
- Título IX de la Ley de Enmiendas a la Educación de 1972, que prohíbe la discriminación basada en el sexo en los programas o actividades educativos.
- Ley de Discriminación por Edad de 1975, que prohíbe la discriminación basada en la edad.


 Anthony DeKeyzer
 Director of Mass Transit, Sun Metro
 City of El Paso

Anthony DeKeyzer, LSSBB, TSSP- Director of Mass Transit
 Sun Metro | 10151 Montana Ave | El Paso, TX 79925
 O: (915) 212-3306 | Email: DeKeyzerAR@elpasosoleras.gov

Anthony DeKeyzer, LSSBB, TSSP- Director of Mass Transit
 Sun Metro | 10151 Montana Ave | El Paso, TX 79925
 O: (915) 212-3306 | Email: DeKeyzerAR@elpasosoleras.gov

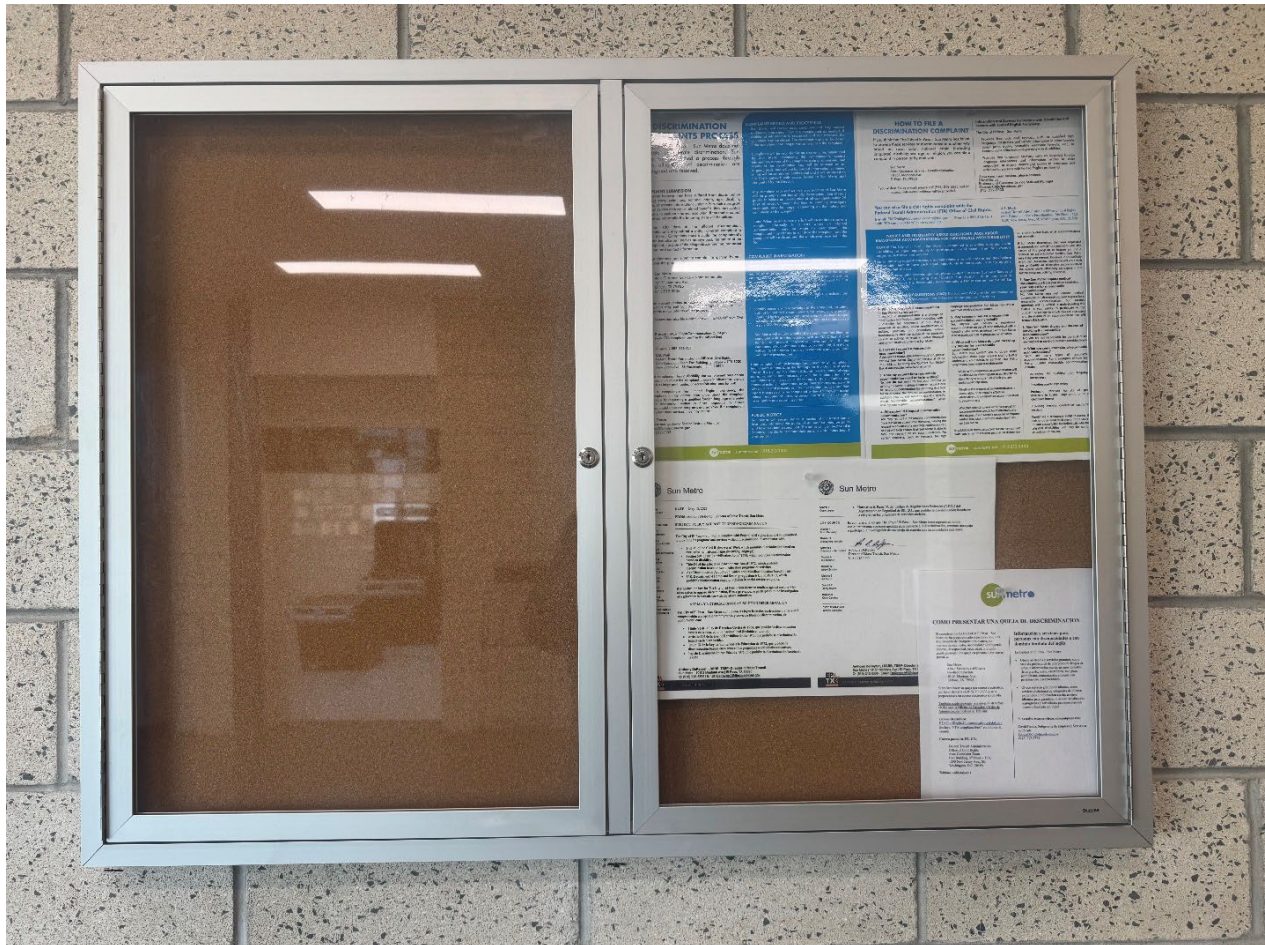


DEL VERINO EXCEPTIONAL SERVICES



DELIVERING EXCEPTIONAL SERVICES

Figure 3: Nondiscrimination Public Notices Displayed at Transit Centers



2. Title VI Complaint Procedure and Complaint Form

Sun Metro has established a process for riders to file a complaint under Title VI. A copy of Sun Metro's Discrimination Complaints Process is included in **Appendix A**. Any person who believes they have been discriminated against on the basis of race, color, national origin, disability, sex or age by Sun Metro may file a Title VI complaint by completing and submitting the agency's Title VI Discrimination Complaint Form (**Figure 5**). Forms are available at our administrative offices or on our website at <https://sunmetro.net/about/title-vi-and-dbe/>

Figure 4: Public Notice on Buses

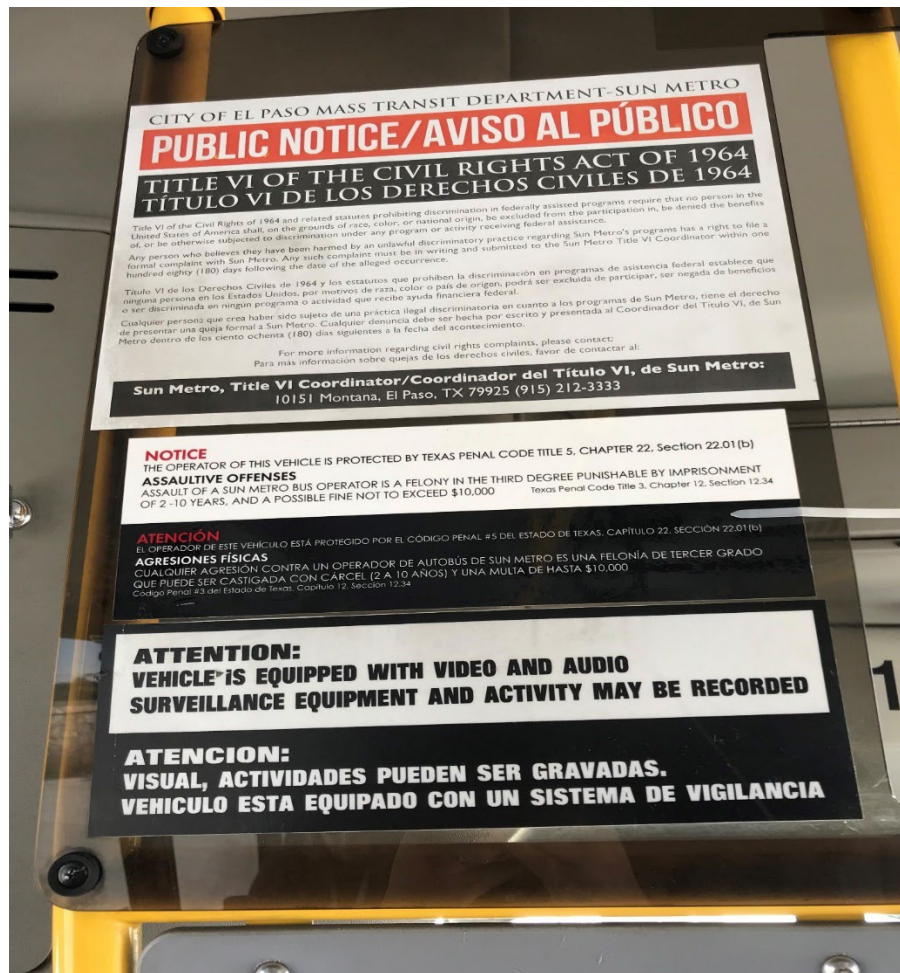


Figure 5: Discrimination Complaint Form (Page 1)



Discrimination Complaint Form
Formulario de Reclamo por Discriminación

Name (Nombre) _____
Address (Dirección) _____
City (Ciudad) _____ State (Estado) _____ Zip (Código Postal) _____
Telephone (Teléfono): Home (Casa) _____ Work (Trabajo) _____
Cell (Celular) _____
Email address (Correo electrónico) _____

Basis of Complaint: Mark all that applies.
(Fundamento(s) del reclamo: Marque todo lo que corresponda):

☐ Race (Raza)	☐ Disability (Discapacidad)
☐ Color (Color)	☐ Sex (Sexo)
☐ National Origin (Nacionalidad)	☐ Age (Edad)

How were you allegedly discriminated against? (¿Cómo ocurrió el presunto acto de discriminación?)

Who allegedly discriminated against you?
(¿Quién considera usted que ejerció discriminación contra usted?)

Name of Organization (Nombre de la organización) _____
Address (Dirección) _____
City (Ciudad) _____ State (Estado) _____ Zip (Código Postal) _____
Telephone (Teléfono): _____

Where did the alleged discrimination occur? (¿Dónde ocurrió el presunto acto de discriminación?)

Date/s and times discrimination occurred
(Fecha(s) y hora (s) cuando ocurrió (ocurrieron) el (los) presunto(s) acto (s) de discriminación)

Figure 5: Discrimination Complaint Form (Page 2)

First time (Primera Vez) _____
 Second time (Segunda Vez) _____
 Third time (Tercera Vez) _____

Were there any other witnesses to the alleged discrimination?
 (¿Hubo testigos del presunto acto de discriminación?)

Name (Nombre)	Work Telephone (Teléfono del trabajo)	Home Telephone (Teléfono de la casa)	Cell Telephone (Teléfono celular)

What can the Department do to resolve the complaint?
 (¿Qué podemos hacer para solucionar esta queja?)

Have you already filed this or other complaint before?
 (¿Había presentado usted la misma o cualquier otra queja antes?)

Who? (¿Con quién?) _____
 When? (¿Cuándo?) _____
 Complaint number, if known (Número de caso, si lo sabe) _____

Signature (Firma) _____ Date (Fecha) _____

Mail to: Title VI Coordinator
 Envíelo a: 10151 Montana Avenue
 El Paso, TX 79925-1515

3. Record of Title VI Investigations, Complaints or Lawsuits

In compliance with 49 CRF Section 21.9(b), Sun Metro maintains a list of all complaints, investigations, and lawsuits naming Sun Metro, on the basis of race, color, and/or national origin. The list includes the date of the complaint, investigation, or lawsuit; and the actions taken in response to the complaints, investigations, and lawsuits. From February 1, 2023 to October 1, 2025, Sun Metro had approximately **8** Title VI-related complaints (**Table 1**). As of the most current writing of this program, there are no complaints or lawsuits pending which alleges discrimination on the grounds of race, color, national origin or any other form of discrimination.

Table 1: Title VI-Related Complaints

Date	Type	Basis of Discrimination	Summary of Allegations	Finding	Action Taken
February 22, 2023	Patron	Race, Color, Age, Gender, National Origin, Disability	Patron alleges she was tortured for riding the bus and using the restrooms at a transit center.	Unsubstantiated - Closed	Reply letter sent to patron.
July 6, 2023	Patron	Race, Color, Age, Gender, National Origin, Disability	Patron alleges she wasn't treated fairly.	Unsubstantiated - Closed	Reply letter sent to patron.
August 10, 2023	Patron	Race, Color, Age, Gender, National Origin, Disability	Patron alleges she was sexually harassed and oppressed.	Unsubstantiated - Closed	Reply letter sent to patron.
December 5, 2023	Patron	Race, Color, Age, Gender, National Origin, Disability	Patron alleges harassment and the bus operators are driving in a "racy way" and jerking the bus at all bus stops.	Unsubstantiated - Closed	Reply letter sent to patron.
May 8, 2024	Patron	Race	Patron alleges he was harassed, denied use of Sun Metro services, and discrimination at a transit center.	Referred - Closed	Investigation concluded. Reply letter sent to patron.
July 16, 2024	Patron	Race	Patron alleges a Sun Metro employee and Sun Metro in general was discriminating, harassing, and denying him bus service.	Referred - Closed	Investigation concluded. Reply letter sent to patron.
November 28, 2024	Patron	Race, Color, National Origin	Patron alleges Sun Metro denied her transit service and prohibited her from using transit centers.	Referred - Closed	Investigation concluded. Reply letter sent to patron.
June 3, 2025	Patron	Race, Color, National Origin, Gender	Patron alleges she was discriminated because Sun Metro buses would not pick her up.	Unsubstantiated - Closed	Reply letter sent to patron.

4. Sun Metro's Public Participation Plan

Sun Metro utilizes El Paso Metropolitan Planning Organization's Public Participation Program, which was revised September 20, 2024 and is available online at: <https://www.elpasompo.org/media/PublicParticipationPlan/PublicParticipationPlan.pdf>

Outreach Efforts – Alerting Riders and Encouraging Engagement

Sun Metro's Public Participation Process includes many new mediums extending beyond the traditional approach, which relied on legal notices and intermittent media coverage. While Sun Metro maintains these elements in its outreach program along with traditional seat-drop flyers, Sun Metro has availed itself of the communication methods more widely used by community members and riders.

While there may be minor variations in the outreach process from time-to-time, the outline below provides the general steps for engaging riders in the decision-making process using a fare or service change as an example.

- I. A service/fare change proposal is developed internally or as a result of public comment;
- II. An internal review by the appropriate department is conducted (for example, Sun Metro's Finance, Planning, and Operations Divisions);
- III. Proposals are reviewed by Sun Metro's Citizen's Advisory Committee (C.A.C.);
- IV. A Title VI review of the proposal is conducted;
- V. Public outreach venues, dates, and times are determined with consideration of the proposed changes and their impact on specific locations/populations within Sun Metro's service area;
- VI. Bilingual (English and Spanish) public outreach materials and a program are developed;
- VII. Outreach in advance of public information sessions is released (using the tool-box of media listed below);
- VIII. The 30 (service modifications) and 45 (fare adjustments) calendar days public comment period ends;
- IX. Sun Metro presents the outcome of the public participation process along with staff recommendations to the Citizens' Advisory Committee and to the Mass Transit Board;
- X. The final service/fare change date is set;
- XI. Outreach is conducted in advance of any service or fare change;
- XII. Bilingual (English and Spanish) system timetable and website updated in advance of the proposed change.

Selection of Meeting Locations

When determining locations and schedules for public meetings, Sun Metro will:

- Schedule meetings at times and locations that are convenient and accessible for minority and LEP communities;

- Employ different meeting sizes and formats including town hall-type meeting formats;
- Coordinate with community organizations, educational institutions, and other organizations to implement public engagement strategies that reach out specifically to members of affected minority and/or LEP communities;
- Consider radio, television, or newspaper ads, and podcasts serving LEP populations.
- Provide opportunities for public participation through means other than written communication, such as one-on-one interviews or the use of audio or video recording devices to capture oral comments.

Methods of Media

The following outreach efforts help alert system users and encourage engagement:

- Newspapers and other periodicals
- Bus and bus shelter advertisements
- Website
- Web-based feedback
- Social media
- Public hearings and public information sessions
- Radio
- On-board Scrolling Messages
- On-board Audio Messaging

The Incorporation of Public Comments into Decisions

All comments received through the public participation plan are given careful and thoughtful consideration. Because there are a number of different ways riders or community members can comment on proposed service or fare changes (mail, email, social media, public meetings and others), all comments are assembled into a single document for presentation to the Mass Transit Department Board for consideration.

5. Improving Access for People with Limited English Proficiency

The USDOT defines Limited English Proficiency (LEP) as persons who do not speak English as their primary language and who have limited ability to read, write, or understand English.

Executive Order 13166 - In 2000, President William J. Clinton signed Executive Order 13166 “Improving Access to Services for Persons with Limited English Proficiency.”

The order provided clarification of Title VI in the Civil Rights Act of 1964, stating that recipients of federal funds must “ensure that the programs and activities they normally provide in English are accessible to LEP persons and thus do not discriminate on the basis of national origin.”

The order also required federal agencies and recipients of federal financial assistance to examine the services they provide and develop an implementation plan to provide meaningful access to LEP persons.

Guidance from the Federal Highway Administration, Federal Transit Administration, and the Texas Department of Transportation stresses the importance of reducing language barriers that can prevent meaningful access by LEP persons to important services.

In order to ensure meaningful access to programs and activities, Sun Metro uses the information obtained in a Four Factor Analysis to determine the specific language services that are appropriate. This analysis helps Sun Metro to determine if it communicates effectively with LEP persons and informs language access planning.

Part I. The **Four Factor Analysis** is a local assessment that considers:

- The number and proportion of LEP persons served or encountered in the eligible service population;
- The frequency that people of Limited English Proficiency come into contact with Sun Metro's programs, activities, and services;
- The importance of Sun Metro's programs, activities, and services to persons of Limited English Proficiency; and
- Resources available to customers and the associated costs.

Factor 1 - The Number and Proportion of LEP Persons Served or Encountered in the Eligible Service Population

According to available 2023 American Community Survey (ACS) data, out of 814,396 people within the El Paso County area, approximately 220,146 people speak English "less than well."

Those reporting to have limited English proficiency consist of 27% of our service area population. Of the portion of respondents with limited English proficiency, 215,187 or 98% of them spoke mainly Spanish, 2,929 or 1.3% spoke an Asian language, 1,495 or 0.6% spoke an Indo-European Language, and another 423 or 0.1% chose "other." Refer to **Table 2** for additional language breakdown.

Four Major Language Groups

Spanish includes Spanish, Spanish Creole, and Ladino.

Indo-European languages include most languages of Europe and the Indic languages of India. These include the Germanic languages, such as German, Yiddish, and Dutch; the Scandinavian languages, such as Swedish and Norwegian; the Romance languages, such as French, Italian, and Portuguese; the Slavic languages, such as Russian, Polish, and Serbo-

Croatian; the Indic languages, such as Hindi, Gujarati, Punjabi, and Urdu; Celtic languages; Greek; Baltic languages; and Iranian languages.

Asian and Pacific Island languages include Chinese; Korean; Japanese; Vietnamese; Hmong; Khmer; Lao; Thai; Tagalog or Pilipino; the Dravidian languages of India, such as Telugu, Tamil, and Malayalam; and other languages of Asia and the Pacific, including the Philippine, Polynesian, and Micronesian languages.

All Other languages include Uralic languages, such as Hungarian; the Semitic languages, such as Arabic and Hebrew; languages of Africa; native North American languages, including the American Indian and Alaska native languages; and indigenous languages of Central and South America (U.S. Census Bureau, 2019).

Table 2: LEP Breakdown

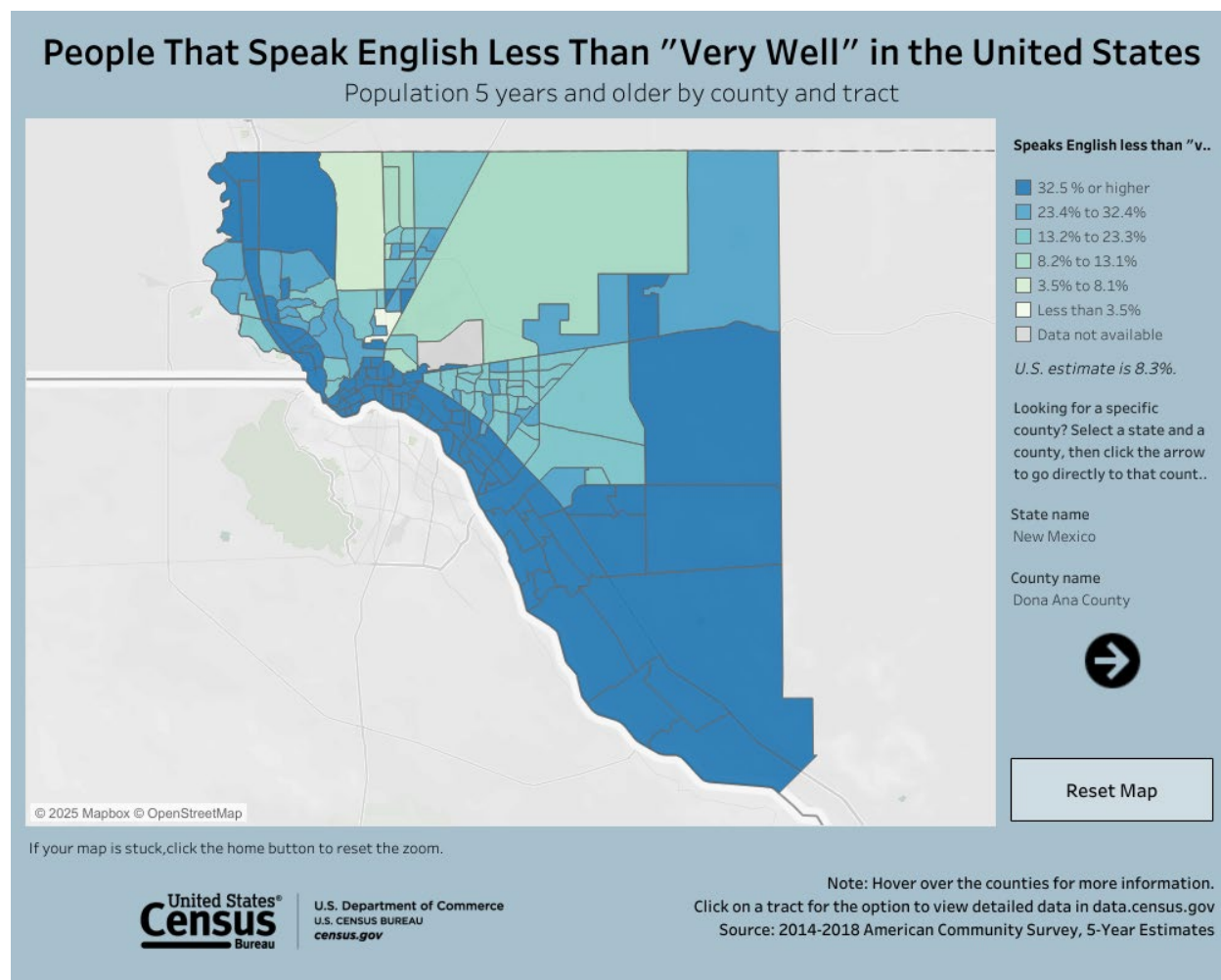
Speak English Less Than “Well”	El Paso County, Texas Estimate
Spanish or Spanish Creole	229,152
Korean	867
German	828
Chinese	775
Tagalog	531
Arabic	450
Vietnamese	351
French (incl. Patois, Cajun)	276
Other Indic Languages	272
Persian	247
Other Asian Languages	213
Japanese	176
Other Pacific Island Languages	158
Serbo-Croatian	128
Urdu	102
Gujarati	101
Russian	100
African Languages	90
Italian	82
Portuguese or Portuguese Creole	39
Mon-Khmer (Cambodian)	38
Thai	29
French Creole	29
Other Native North American Languages	23
Hungarian	22
Hebrew	21
Navajo	15
Other Indo-European Languages	15
Armenian	14
Other Slavic Languages	11
Other and Unspecified Languages	10
Greek	9
Hindi	7
Polish	5
Laotian	0
Other West Germanic Languages	0
Hmong	0
Scandinavian Languages	0
Yiddish	0

U.S. Census 2023: American Community Survey 5-Year Estimate Data

Locations of the LEP Community

While the need to provide language services to the Spanish-speaking population in the Sun Metro service area is demonstrated in the data above, it is helpful to understand where populations of limited English proficiency reside. The map below (**Figure 6**) provides a spatial display of residents who report speaking English “less than well.”

Figure 6: LEP Population in El Paso, Texas



Factor 2 - The Frequency That People of Limited English Proficiency Come Into Contact with Sun Metro's Programs, Activities, and Services

Sun Metro has high levels of service in the LEP clusters and does provide bilingual services. A high percentage of the Sun Metro personnel can communicate effectively in both English and Spanish, thus capable of providing the necessary translations or interpretations.

Factor 3 - The Importance of Sun Metro's Programs, Activities, and Services to Persons of

Limited English Proficiency

Sun Metro offers two primary transportation services: fixed route and paratransit services. All areas with a concentration of persons with LEP are well served by both fixed route and paratransit.

Living Independently Facilitated by Transportation (LIFT) is the name of Sun Metro's paratransit service, which is a demand response service provided for persons with disabilities or other limitations. Sun Metro's fixed routes are an essential mode of transportation for individuals in the surrounding area. Sun Metro's fixed route and paratransit personnel consists of a high percentage of bilingual speakers who can assist in ensuring unimpeded meaningful access by LEP individuals as well as utilizing an abundance of common symbols and maps.

Factor 4 - Resources Available to Customers and the Associated Costs

Sun Metro has resources available to customers in-need of interpretation or translation assistance. Sun Metro's Customer Service is 100% bilingual (English and Spanish) and can assist LEP individuals. The coach operators can also provide translation or interpretation assistance, if needed. Additionally, Sun Metro provides all of its public information in both English and Spanish. Braille signage is also available at all facilities, bus stops, and bus bays to assist visually impaired citizens.

The City of El Paso also provides sign-language interpreters as well as linguistic interpreters at public meeting/hearings.

Conclusion

Based on the above four factors, Sun Metro has decided to continue to rely on its workforce for aid in language interpreting, while providing additional resources to give meaningful access to persons of limited English proficiency.

Part II: Identifying an LEP person and alerting riders of language assistance

Sun Metro employees make every reasonable effort to accommodate all customers. To ensure persons of limited English proficiency have meaningful access to services, employees should follow these few guidelines:

- Examine requests for language assistance from past meetings or events to anticipate future language service needs;
- At any future outreach meetings, an employee member will be at the door to greet any people entering the meeting and should also be tasked with identifying any persons of limited English proficiency;
- Keep a tabulation of persons requiring language assistance.

Language Assistance Measures

Sun Metro's selection of the following procedures is based on the need for language service and the resources that can be dedicated to this purpose.

- Attempt to determine what language is required;
- Use the U.S. Census Bureau's "I Speak" card if necessary;
- If the person can speak some English, try to discern their needs without the help of language service;
- For help with translating individual words, use Google Translate;
- If the employee cannot effectively communicate with the person, attempt to refer them to one of the following language services:

City of El Paso
Municipal Clerk's Office
300 N. Campbell
El Paso, TX 79901
(915) 212-0049

United States Department of Labor
700 E. San Antonio Avenue Rm. B-400
El Paso, Texas 79901
(915) 534-6426

- Should it be necessary and all other options exhausted, employees may use any other creative means of communicating with the person of limited English proficiency.

Employee Training

- Employees receive LEP Training. See Appendix B for the Title VI and LEP training PowerPoint.
- Customer Service employees and Transit Supervisors are also directed to keep a record of any language assistance requests.

Outreach Techniques

Sun Metro has several avenues for outreach that it currently pursues, as well as future options should the need arise. Key print materials may be translated to accommodate a population of LEP persons should it be found that they are not receiving meaningful access to Sun Metro's services.

Monitoring and Updating the LEP Plan

This plan is a flexible guide and reference tool for employees. It should be updated, when necessary, but at the least, it should follow the Title VI Program's triennial schedule. It should also be revisited when new U.S. Census data is available, as this will help identify any unmet needs.

Future revisions and updates to this plan will be based on the following:

- LEP populations in the service area or population affected or encountered;
- Frequency of encounters with LEP language groups;
- Nature and importance of activities to LEP persons;
- Availability of resources, including technological advances and sources of additional resources and the costs imposed;
- Whether existing assistance is meeting the needs of LEP persons;
- Whether employees know and understand the LEP plan and how to implement it;
- Whether identified sources for assistance are still available and viable.

6. Minority Representation on Planning and Advisory Bodies

Recipients that have transit-related, non-elected planning boards, advisory councils, committees, or similar committees, the membership of which is selected by the recipients, must provide a table depicting the racial breakdown of the membership of those committees.

Citizen's Advisory Committee (CAC)

The CAC acts as an advisory body to the Mass Transit Department Board (MTDB) and advises it on any matters over which the MTDB board has authority. The CAC may recommend studies or expansion of the system, report results, and other matters the committee considers necessary and appropriate.

Table 3: Citizen's Advisory Committee Racial Breakdown

Body	White (Not Hispanic or Latino)	Hispanic/ Latino	Black or African American	Asian	Native Hawaiian/Other Pacific Islander	American Indian/Alaska Native	Two or More Races
Citizens Advisory Committee	3	4		1			

City Council Members represent the MTDB. The monthly MTDB meeting coincides with the City Council's first meeting of each calendar month. Sun Metro encourages the participation of minorities on such committees through public announcements on city websites and postings in City facilities.

7. Subrecipient Compliance and Monitoring

Subrecipient transportation providers will adhere to Sun Metro's standard as it relates to all transportation requests to ensure minority, low-income, and LEP's are included in decision-making processes and that no one is excluded from service participation and discriminated against based on the ground of race, color or national origin. All customer complaints related to subrecipient transportation flow through Sun Metro's complaint logging and investigating procedures to ensure proper tracking, handling, and prompt resolution of the complaints.

Requirements for Fixed Route Transit Providers

1. System-wide Standards and Policies

Fleet

Sun Metro provides service with vehicles of adequate size, design and features based on need and passenger loads due to heavy peak demand. Sun Metro operates a Compressed Natural Gas (CNG) fixed route fleet of 157 buses, with 100 required during weekday peak periods (between 6 a.m. to 9 a.m.). On Saturdays, 86 buses are required during peak periods with 26 peak buses on Sundays. All routes are designated wheelchair accessible and all buses assigned to routes are wheelchair lift-equipped. The standard fixed route fare is \$1.50.

The City's ADA complementary paratransit service (LIFT) is operated under contract with MV Transportation. MV operates a fleet of 58 City-owned vehicles during the same hours as fixed-route service throughout the city limits and within 1.5 miles of the contracted service. The City supplements directly operated service with purchased demand taxi service for ambulatory persons with disabilities. The ADA fare is \$2.50 per trip. The LIFT consists of approximately 4,466 active participants.

The LIFT provides curb-to-curb (origin to destination) on-demand transportation services for disabled citizens unable to use conventional public transportation. The 58 accessible lift-equipped vehicles are assigned based on transportation need and volume to cover 100% of the trip demand for each day, rotating them for preventative maintenance and mileage coverage purposes.

Vehicle Assignment Policy

Vehicle allocations to service each route shall be determined based on the size and type requirements of the route. This policy ensures that vehicles assigned are appropriate for the operational needs of the routes, including capacity demands, vehicles dimensions, and infrastructure compatibility at the assigned facilities.

Guidelines

Route Requirements:

Units will be assigned to routes taking into account the following limiting factors, such as ridership, roadway conditions, and route category (Brio, Express, local, etc.).

Vehicle Size and Capacity:

Assignments will prioritize the use of vehicles with appropriate seating and standing capacity to accommodate typical passenger loads and peak demand.

Accessibility:

All assigned units have to meet ADA requirements to provide accessible service on all routes.

Implementation:

The Operations and Fleet Maintenance Departments will coordinate to review vehicles assignments based on performance data, service changes, and fleet availability.

Vehicle Load

Currently, the Sun Metro passenger load standard allows an average load factor of 150 percent for peak-period local service. It is reduced to 100 percent for base period service. A load factor of 100 percent is the standard for express service. A 150 percent passenger load factor for peak period service is generally high.

Passenger counts indicate an approximate average load factor of 1.50 passengers per trip during each peak service level. The frequency of service on a route is set so that the load standards are not exceeded on consecutive buses; however, they may be exceeded for non-consecutive buses. Load factors at or below the standards do not prevent the addition of service where loading requires passengers to stand for more than 15 minutes of their travel time. The data is collected and reviewed to evaluate this criterion are traffic checks of passenger loads, public comments, operator reports and supervisor checks.

Vehicle Headway (Frequency)

Vehicle headway standards that have been developed specify maximum service frequencies that are generally based on the type of service, the time period, the day of the week, and the passenger demand. Specifications allow maximum headways of 73.1 minutes for peak-period and 90.4 minutes for the base period. Sun Metro's current vehicle headways are consistent with industry standards. Passenger counts, load checks, operator reports, public comments, supervisor reports, and Automated Vehicle Locator (AVL) reports are all used in evaluating vehicle headways.

On-time Performance (Schedule Adherence)

A bus is determined to be late if it departs its scheduled “time point” five or more minutes later than the published time. Buses are considered early if they depart from a published time point at any time prior to the scheduled departure. It is Sun Metro’s goal to be on-time at least 90% of the time. Sun Metro has been averaging 90.4% on-time performance within the last three years. On-time performance is tracked and included in monthly performance reports to the Sun Metro Board of Directors.

Bus Operations staff also regularly monitors on-time performance and advises operators who consistently fail to meet on-time performance standards that are within their control. Discussions with bus operators are also used to identify vehicle scheduling issues which are corrected through service changes three times annually.

Service Availability – Access to the Bus

Standards for route spacing are generally based on an area’s residential or employment density, distance from an activity center, and the type of transit service already in operation or planned for the area. These spacing requirements frequently stipulate that a specific percentage of an area’s residents should be within ¼ mile or ½ mile of a transit route.

Sun Metro has established a goal that service should be provided for areas with a density of 2,000 to 3,000 persons per square mile. The Sun Metro goal is that service should be provided within one-half mile of 50 percent of the population. This established standard is appropriate to the Sun Metro level of service.

The data required for the evaluation of route spacing consists of population and employment data, maps displaying trip generators, residential areas, the transit network, and public comments.

There are seven major ad hoc transfer points which are located at:

- Bert Williams Downtown Santa Fe Transit Center;
- Robert E. McKee Five Points Transit Center (central El Paso);
- Arves E. Jones, Sr. Transit Center at Northgate (northeast El Paso);
- Arturo Tury Benavides Eastside Transit Center;
- Upper Eastside Transit Center (far east El Paso);
- Al Jefferson Westside Transit Center;
- Nestor A. Valencia Mission Valley Transit Center;
- and Glory Road Transit Center (located by the University of Texas at El Paso).

Sun Metro’s service coverage is excellent in the highly developed portions of the City. Most of the City is located within a reasonable walking distance from an existing route with the majority being within one-quarter of a mile.

Bus routes are divided into four categories: Locals, Circulators, Expresses, and Crosstown routes. Each service category operates as a fixed route service.

Features characterizing each service category are as follows:

Local Service - Routes such as these primarily operate local service between closely spaced stops; have frequent service; serve long to medium length trips within high-density residential land use and are oriented toward the Central Business District.

Express - Express service from the Westside, Northeast, Eastside and Lower Valley is provided to downtown El Paso. Sun Metro operates four express routes from nine park-and-ride locations to facilitate peak-period commuter service in outlying suburban areas and to serve non-traditional patrons.

Cross-town - Fixed-route service that connects the East, Northeast, and Lower Valley sectors of El Paso focused on major activity centers; provides essential system connections within these areas.

Circulator Routes - These routes provide convenient neighborhood service to include routes radiating from the Northgate, Eastside, Westside, Five Points, and the International Bridges. These areas connect service to hubs where customers can transfer to connecting routes.

Transit Amenities Policy

Transit amenities should be distributed based on approved criteria that prioritize accessibility, maintenance feasibility, ridership demand, and safety. These amenities include but are not limited to shelters, benches, lighting, waste containers, bicycle racks, route signage, wayfinding signage, and real-time information displays. For placement of accessory transit amenities/facilities, decisions are made through several channels depending on the type and nature of the facility with primary input coming from passenger use, public input, coach operator/supervisory staff, the Mass Transit Department Board, and community-oriented organizations.

Guidelines

Ridership Demand:

Amenities will be prioritized at stops with higher daily ridership to serve a greater number of passengers.

Safety and Security:

Amenities such as lighting and visibility features should be installed at locations that have been identified to have safety concerns or high pedestrian traffic to enhance rider security.

Accessibility:

Facilities should be designed and placed to be ADA-compliant to accommodate passengers with disabilities.

Environmental and Physical Constraints:

Placement will have to account for available space, other existing infrastructure in the immediate area, and environmental factors of the surrounding area to ensure practicality and maintenance feasibility.

Implementation:

Sun Metro departments will collaborate to conduct assessments periodically of amenity needs across the Transit Service Area of the City of El Paso, incorporating public feedback, ridership data, and field evaluations of potential sites of amenity improvements.

Passenger Shelters

As of October 2025, there are 611 bus shelters installed to protect riders from the intense sun typical to El Paso, which usually reaches 3-digit temperatures beginning in the spring and throughout the summer. In addition, the bus shelters protect riders from the extreme gusts that could reach up to 70 mph.

Bus Shelter Designated Point System

The point system identifies pertinent factors that are weighed according to the relative importance Sun Metro attaches to each category. These factors and corresponding points can be found under the section “Monitoring System-Wide Program Service Standards.”

Passenger Stops

As of October 2025, there are 2,394 regular bus stop signs installed. Bus stops are customarily placed every 700 feet in residential areas (7 per mile) or every 400 feet in major activity areas, such as the Central Business District or strip commercial development (12 per mile). They are delineated by a sign on a pole, with the sign designed to provide identification as an official Sun Metro bus stop in both inbound and outbound directions.

Park & Ride Facilities

Sun Metro operates 4 express routes from 9 Park & Ride locations to provide accessible transfer points, facilitate peak-period commuter service in outlying suburban areas, and to serve non-traditional patrons. Amenities at these locations include shelters, benches, nighttime lighting, and paved parking areas.

El Paso Streetcar

On November 12, 2018, the El Paso Streetcar began service. The El Paso Streetcar route (**Figure 9**) highlights all the wonderful things that make El Paso downtown and uptown a unique place to visit. The 4.8 mile-route runs in two loops through El Paso's uptown and downtown areas. Both loops interconnect through a single-tracked corridor on an international bridge, an array of businesses, restaurants, government buildings, a convention center, a downtown ballpark, and the University of Texas at El Paso, among many other prominent locations. As part of this project, six vintage streetcars (the same vehicles that ran on El Paso streets until 1974) were restored for the rigors of daily service. While the cars are decades old, they are outfitted with modern amenities including:

- Seating for 35 people and additional space for standing riders;
- Free Wi-Fi;
- ADA accessibility;
- Bike racks;
- Air conditioning;
- Heating;
- Safety upgrades;
- Modern propulsion;
- Streetcar branding along the route and signage at designated stops; and
- Pavement, sidewalk, and driveway improvements at designated stops.

Figure 7: El Paso Streetcar & Route Map



Rapid Transit Service (RTS) Corridors

The highest transportation priority for the City and Sun Metro is the implementation of a four-line, citywide RTS/Transit Oriented Development (TOD) corridor system that connects with other regional and local bus services as well as rail, air, and ground transportation. Corridors include:

- International/Downtown/Central El Paso – serviced by the other three corridors, services the international border area to Glory Road and the University of Texas at El Paso campus.

- Mesa Corridor – services Westside Transit Center to Downtown Transit Center and ends at Glory Road.
- Alameda/North Loop/Mission Valley Corridor – services Alameda Street and far-Southeast El Paso, connecting to an El Paso County operated Rural Transit line that provides limited fixed route service to the East of Montana and the Mission Valley area incorporated cities.
- Montana Corridor – services East and Far East El Paso to George Dieter.
- Dyer Corridor – services Northeast El Paso.

The Brio System

Brio is Spanish for excitement, verve, and energy. It is also the term used to describe and brand El Paso’s RTS system. In addition to Transit Terminals, each RTS Corridor has several Brio stations that are well-lit and rider-friendly. Amenities include:

- Wi-Fi hotspots;
- Automated Brio status information boards;
- Translucent panels for better lighting;
- Bike racks;
- Shade screens;
- Electronic real-time displays;
- Ticket Vending Machine (T.V.M.) and
- Solar-powered compacting trash can(s).

The stations comply with all City, State and Federal regulations. Where feasible, public art displays selected or designed by the City’s Museums and Cultural Affairs Department Public Art Division are included either as standalone pieces or as components of improvements throughout each corridor.

Figure 8: Mesa Brio – Arts District Bus Shelter

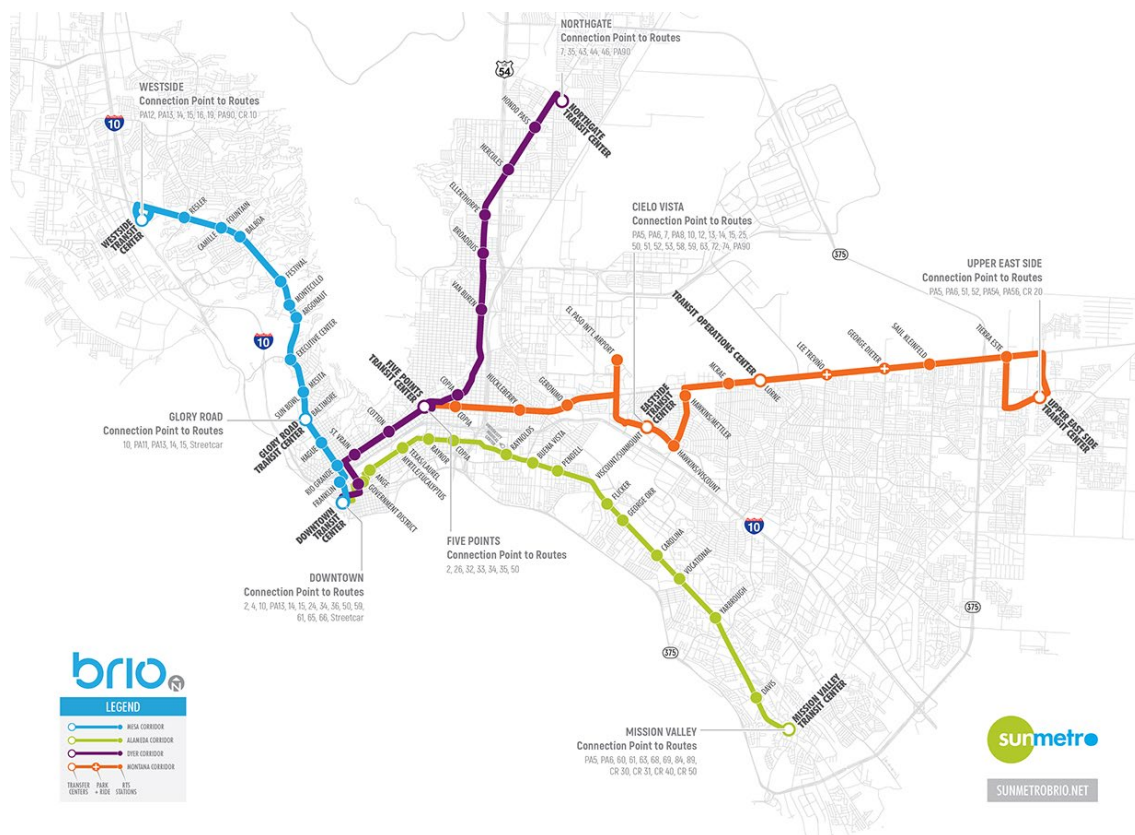


Figure 9: Mesa Brio – Montecillo Bus Shelter



Sun Metro Brio began in the Fall of 2014, with the introduction of the Mesa corridor. Alameda and Dyer RTS corridors became operational on September 23, 2019. Lastly, the Montana corridor became operational in the Fall of 2022. See **Figure 10** for Brio map.

Figure 10: Brio Rapid Transit System Map



The 60-foot articulated Brio buses run on CNG fuel with a 400-route mile capacity and seven-minute fill-up time. They are well equipped to keep the modern-day rider comfortable and informed of their destination while staying in touch with work, family, friends or just enjoying the ride. The amenities include announcement monitor, Wi-Fi, and bike racks.

Figure 11: Brio Bus



2. Collect and Report Demographic Data

Collection and Reporting of Demographic Data - 2022 Sun Metro On-Board Survey

Purpose of the Survey

The primary purpose of this study was to provide Sun Metro, the Mass Transit Department Board, the El Paso Metropolitan Planning Organization, and the Texas Department of Transportation – El Paso District with information that will be used to help plan future improvements to the bus system in the City of El Paso. For example, the results of this study may be used to help decide what new routes to develop and to help plan changes to existing routes. These improvements could make bus service accessible to more people in more parts of the metropolitan area.

Major Findings

The information obtained will be used to help plan future improvements to the bus system in the City of El Paso. For example, the results of this study may be used to help decide what new routes to develop and to help plan changes to existing routes. These improvements could make bus service accessible to more people in more parts of the metropolitan area.

Number of Vehicles in the Household & Household Income

According to the survey results, 36% of Sun Metro riders do not own a vehicle and 48% live below the poverty level.

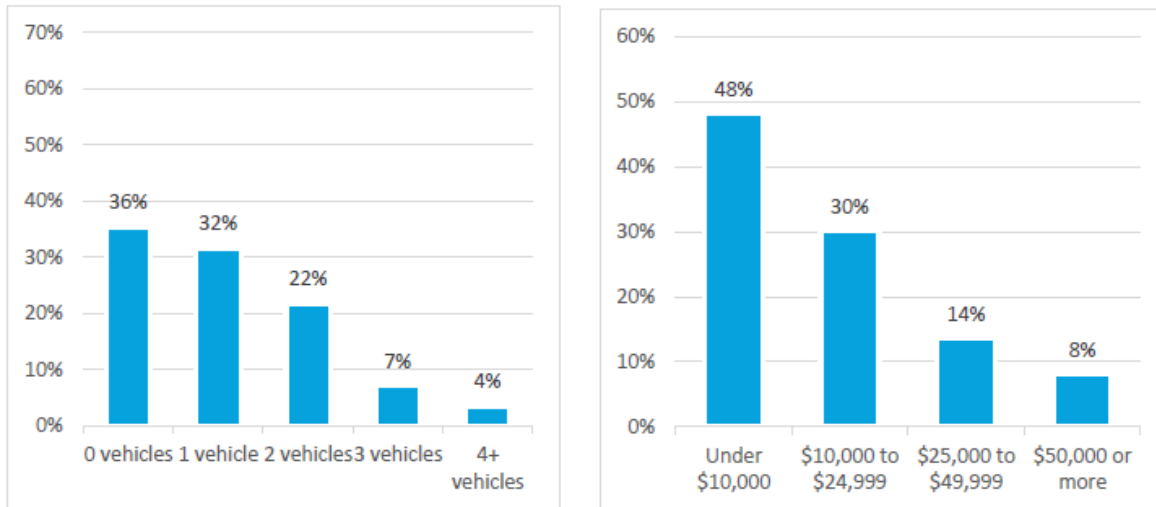


Figure 12: 2022 Survey Results: Vehicles in the Household & Household Income

Sun Metro Usage & Rider Tenure

About 52% of individuals surveyed said they use Sun Metro’s transit service about 5-6 days a week and 44% are long-term riders.

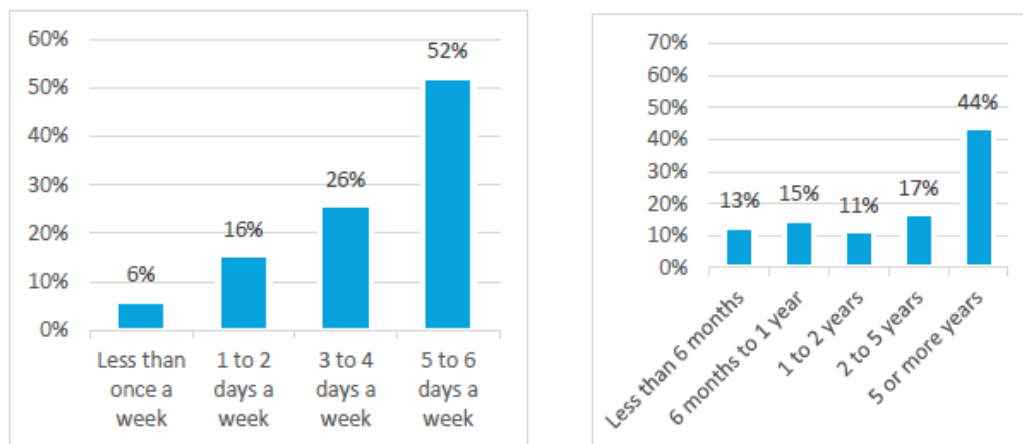


Figure 13: 2022 Survey Results: Ridership Usage & Tenure

Rider Origins & Destinations

A majority (70%) of Sun Metro riders live in El Paso, while one-quarter (28%) live in Ciudad Juarez. The highest percentage (36%) of individuals use Sun Metro transit service to commute to work.

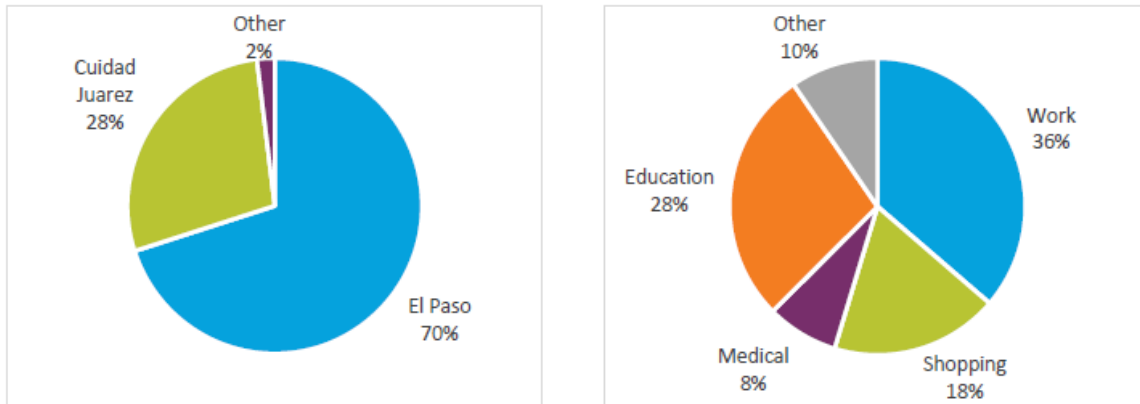


Figure 14: 2022 Survey Results: Rider Origins & Destinations

Rider Age & Gender

A majority of riders (22%) are between the age of 18-24 and are female (54%).

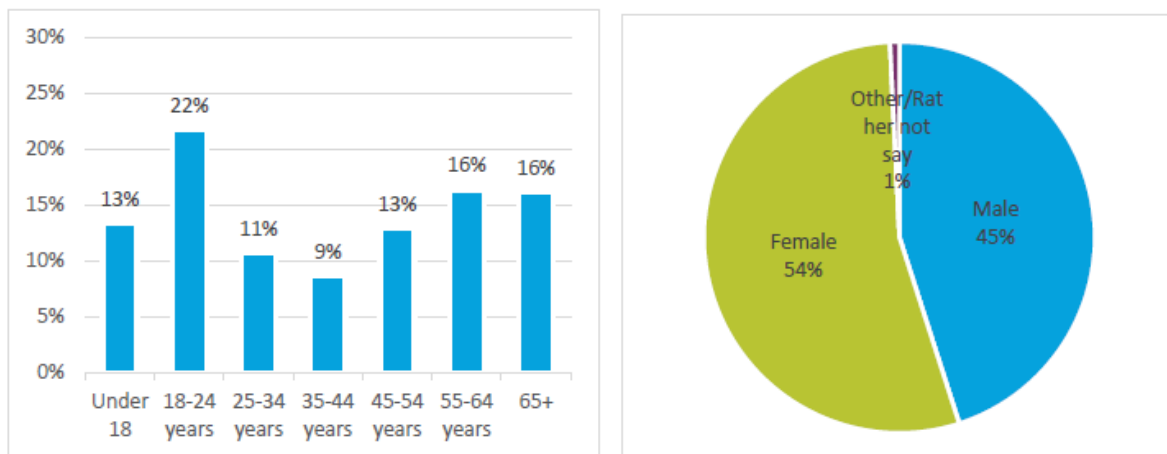


Figure 15: 2022 Survey Results: Rider Age & Gender

Figure 16: Title VI Monitoring: Sun Metro Transit Facilities Map with Transit Lines

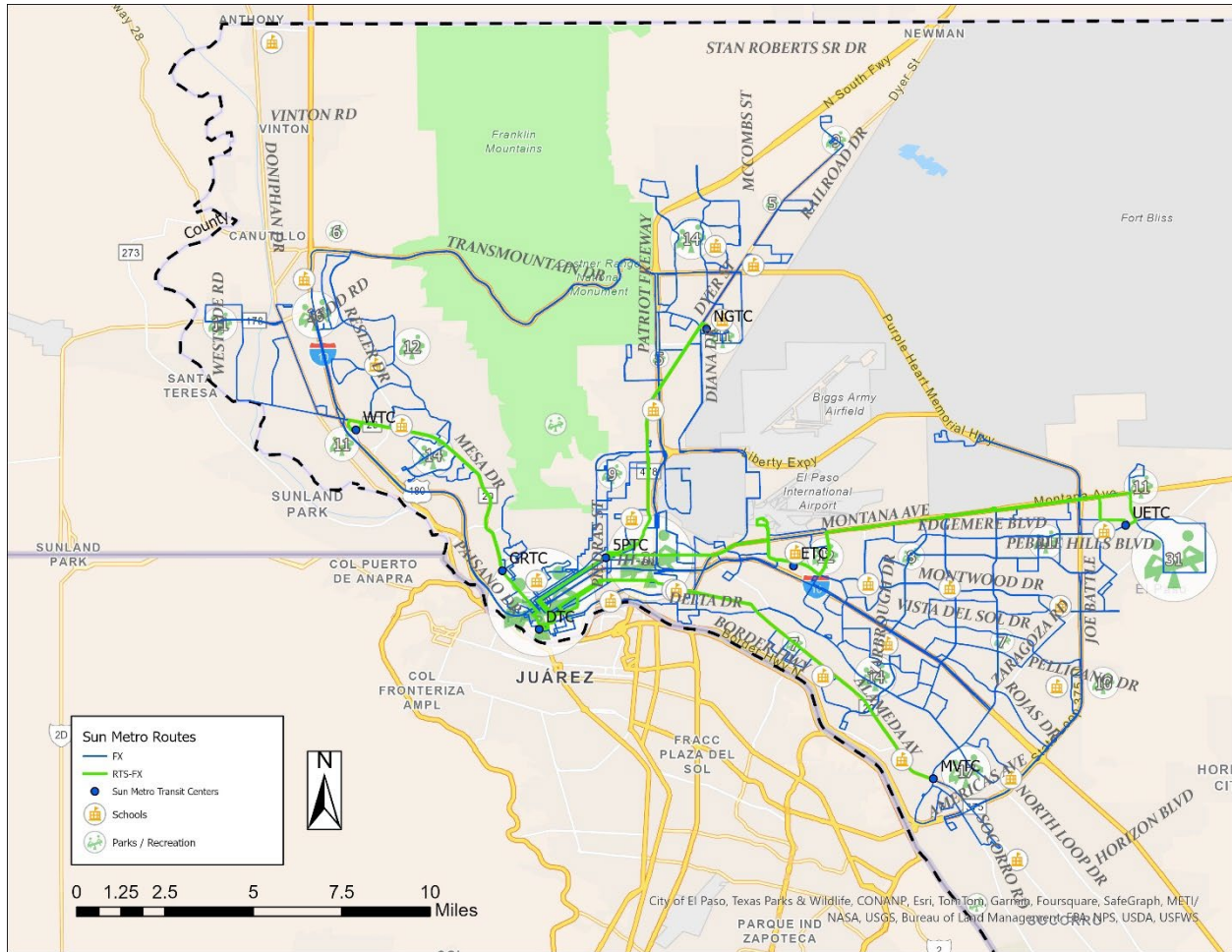


Figure 17: Title VI Monitoring: Sun Metro Transit Facilities Map with Transit Lines – Overlaid with Low Income Census Tracts

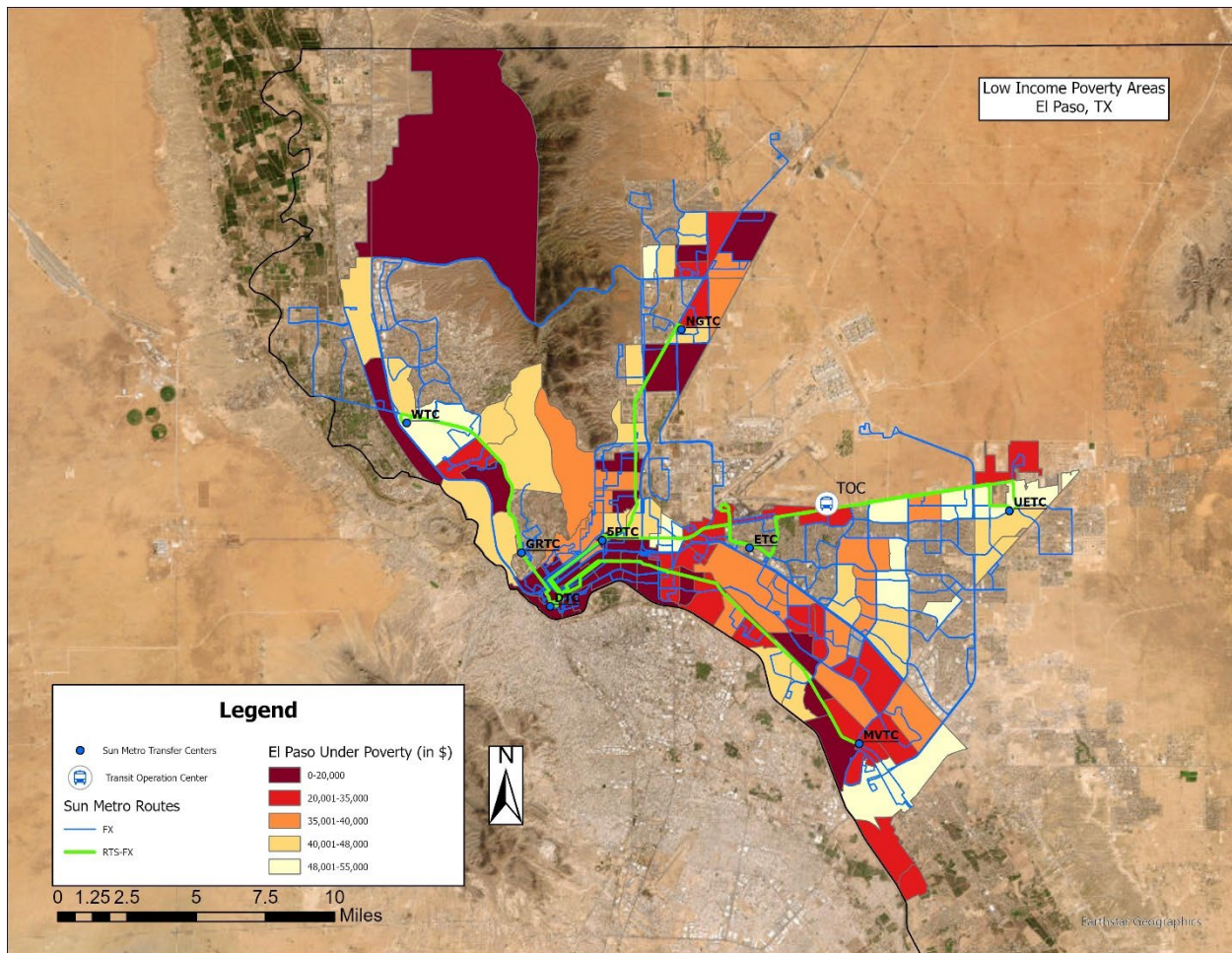
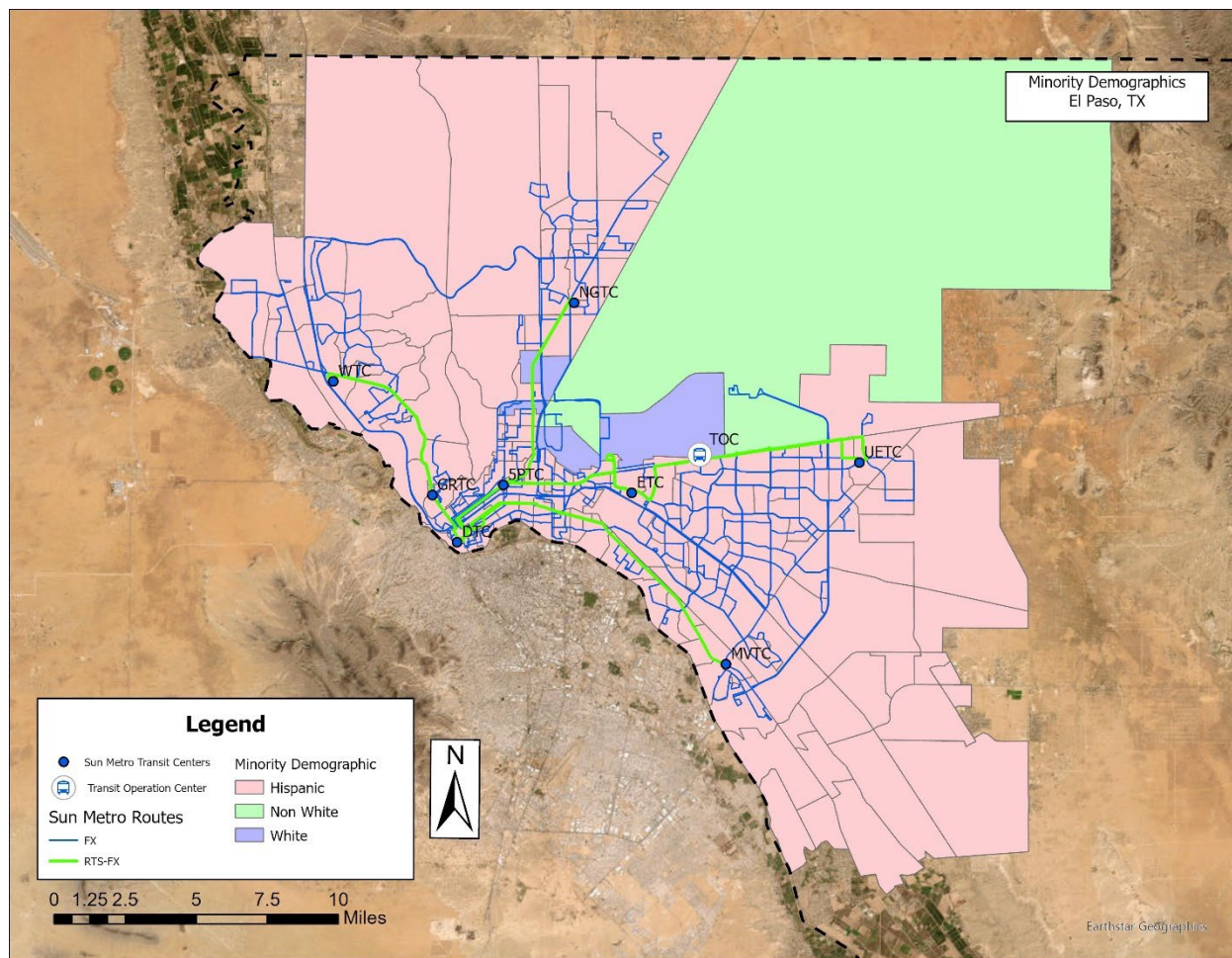


Figure 18: Title VI Monitoring: Sun Metro Transit Facilities Map with Transit Lines – Overlaid with Minority Census Tracts



Demographic Service Profile

Transit Needs Index Factors

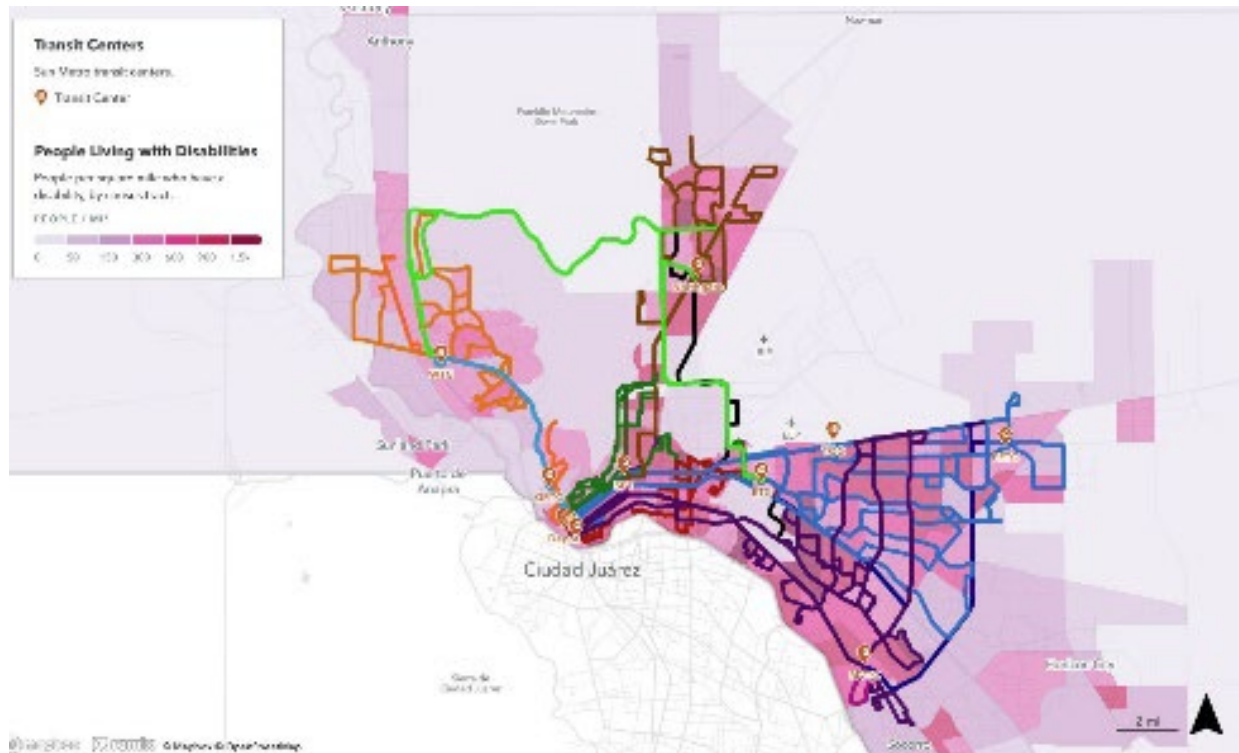
In reviewing 2018-2022: ACS (American Community Survey) 5-Year Estimates data for the El Paso Region on the disabled, elderly, household without an automobile, household below poverty level, and median income populations; the Transit Needs Index (TNI) serves as the basis to establish indicators of needs for transit and provides an analysis of the demographic groups in need of public transportation reliability. The lowest index score is 5 and the highest is 15.

Transit Needs Index Factor 1 – Disabled Population

Approximately 9.7% of the El Paso population is classified as having a disability (calculated from the U.S. Census 2021). See **Figure 19**.

- A census tract in which the percentage of disabled is less than 24% is considered as having less demand for public transit.
- A percentage of disabled between 24% and 40% is considered the median need.
- A percentage of disabled of more than 40% is considered to have a high need for transit.

Figure 19: El Paso Disabled Population Map

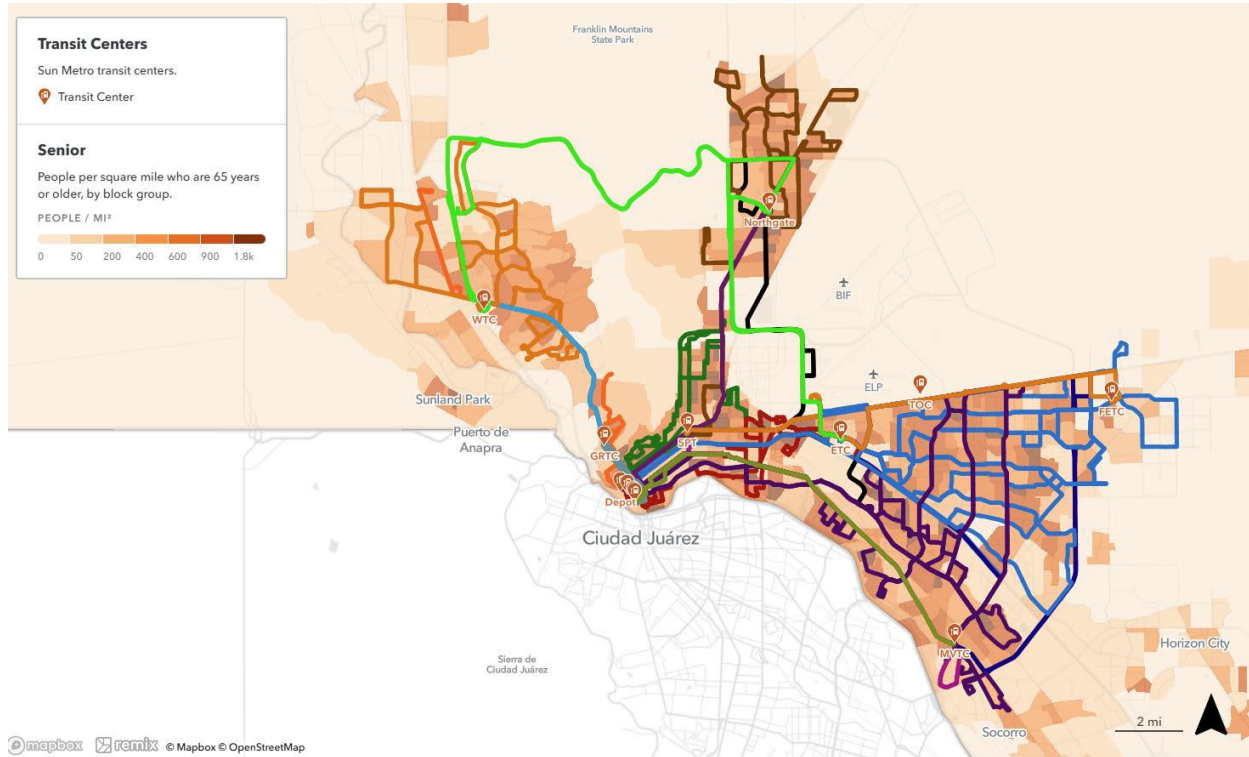


Transit Needs Index Factor 2 – Elderly Population

A total of 13.5% of the El Paso population is older than 65 (U.S. Census 2021). See **Figure 20**.

- Census tracts in which the percentage of households age 65 and over is less than 8% of all households are considered to have a low need for transit.
- A percentage of persons age 65 and over between 8% and 14% is considered medium need.
- A high need for transit based on age is found in census tracts with more than 14% of all households are 65 and older.

Figure 20: El Paso Elderly Population Map



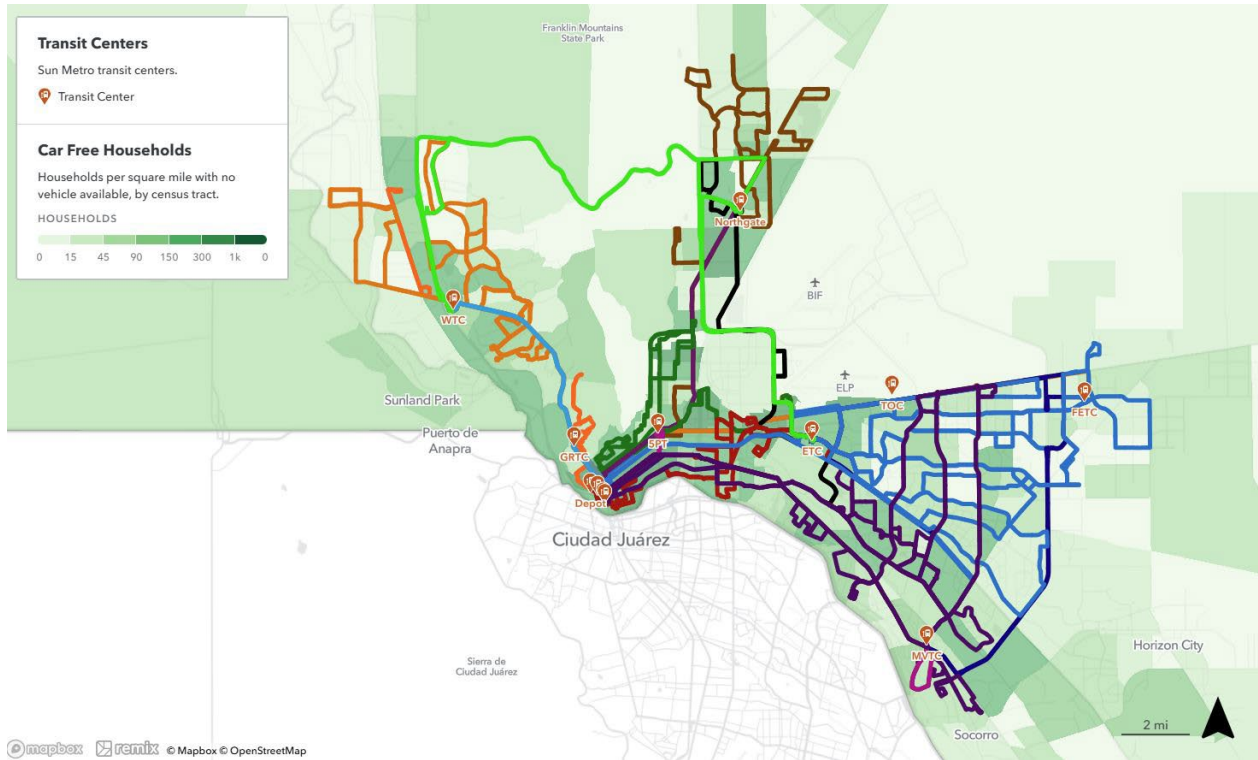
Transit Needs Index Factor 3 – Percentage of Households without an Automobile

Households lacking an automobile in the City of El Paso are significantly challenged with respect to mobility options. In El Paso, 8.4% of households do not have at least one vehicle. See **Figure 21**.

Considering the average family size of 4 individuals per household, the ownership of only one automobile per household significantly challenges their transportation choices.

- Census tracts with fewer than 10% of households without at least one vehicle are considered to have a low need for transit.
- Tracts averaging between 10% and 30% of all households without automobiles are considered to have a medium transit need.
- Tracts with more than 30% of households without automobiles are considered to have a high transit need.

Figure 21: El Paso Households w/o Automobile

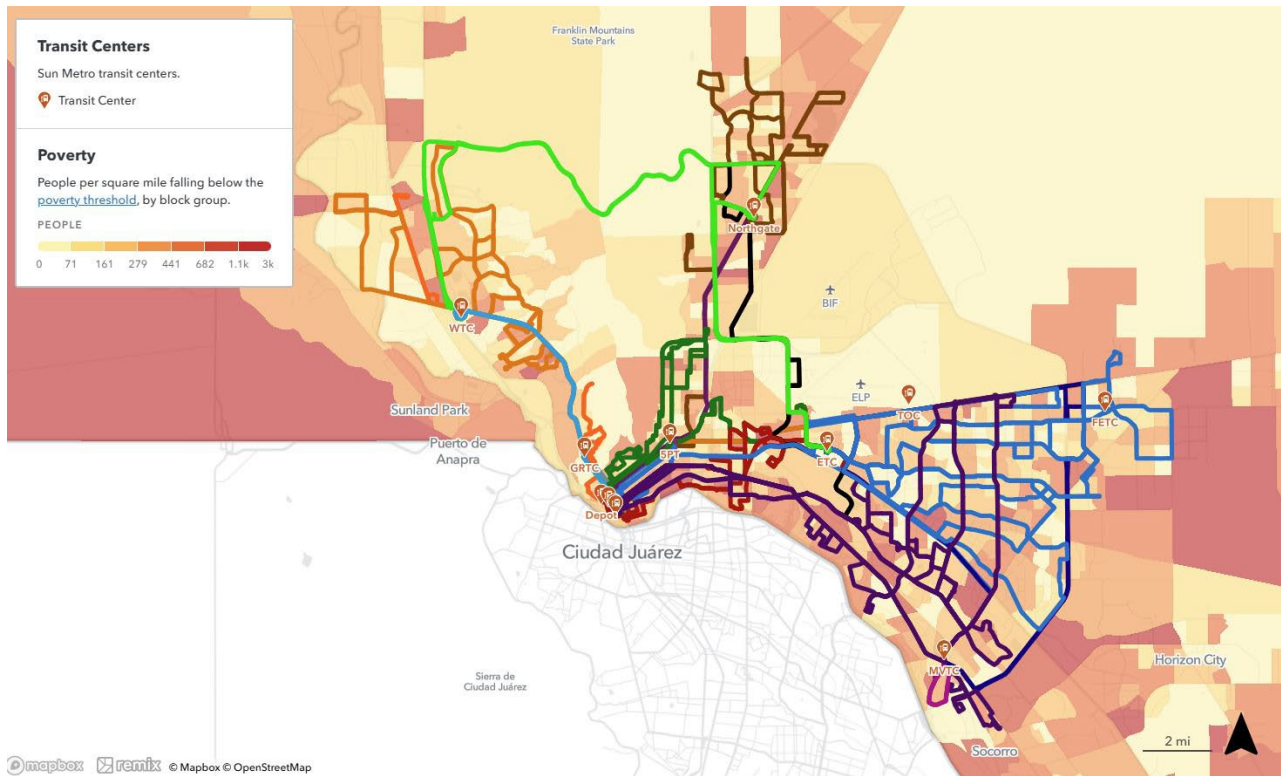


Transit Needs Index Factor 4 – Percentage of Household below Poverty Level

Communities with a higher percentage of households below the poverty level are less likely to have access to reliable private transportation and therefore need alternate transportation. In El Paso, 18.5% of households are living below the poverty level. See **Figure 21**.

- Communities with over 43% of households below poverty level are considered to have a high need for transit.
- Communities with 20% to 43% of households below the poverty level are deemed as having a medium need for transit.
- Tracts with less than 20% of households below the poverty level are considered to have a low need for transit.

Figure 22: El Paso Poverty Level

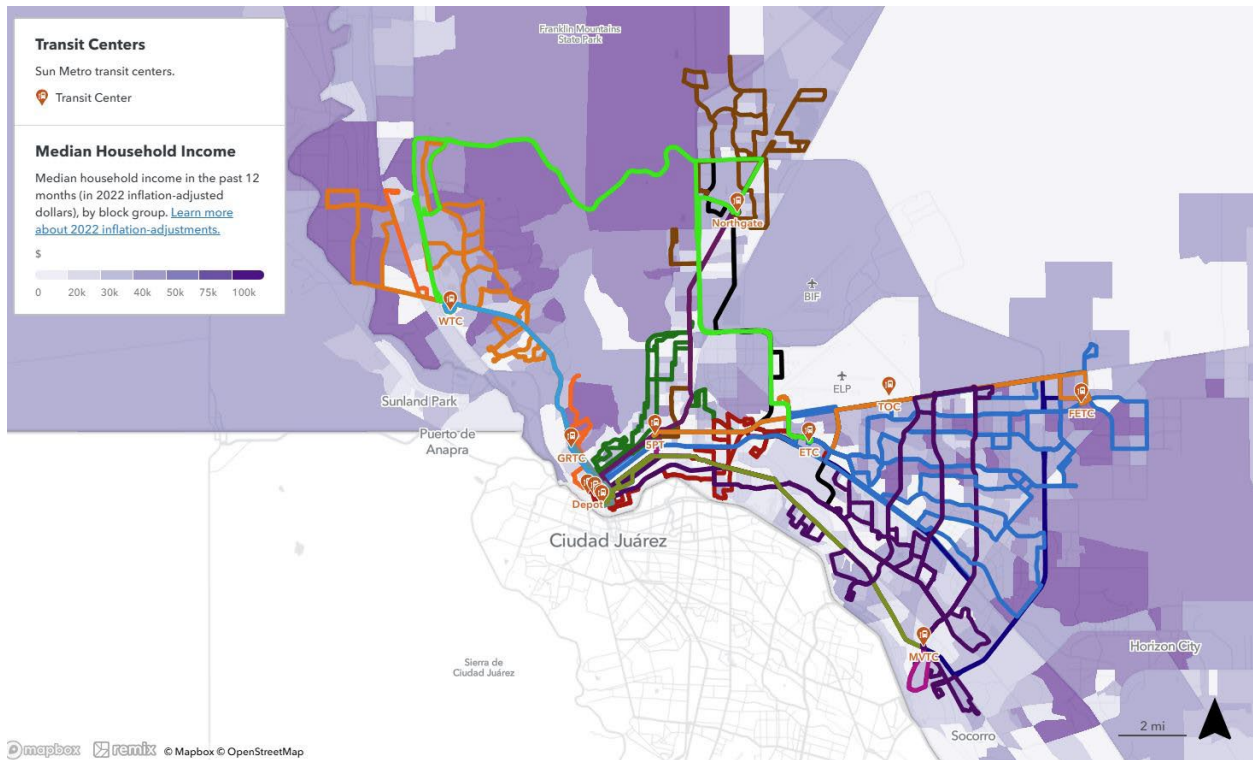


Transit Needs Index Factor 5 – Median Household Income

Households with income levels significantly lower than the median household income for the City of El Paso is considered to have a greater need for transit service. Communities with household incomes well above the median income are viewed as having a lower critical need for basic transit. In El Paso, the median household income is \$58,859. See **Figure 23**.

- In El Paso, census tracts with household incomes below \$25,165 are considered to have a high need for transit services.
- Census tracts with incomes that range from \$25,165 but no more than \$51,044 per household are considered the medium need for transit.
- Households with income above \$51,044 are considered low-need.

Figure 23: El Paso Median Household Income



3. Monitoring of Service Standards

As part of the Title VI Program update, the Federal Transit Administration (FTA) requires transit providers to monitor the performance of their transit system relative to their system-wide service standards and service policies not less than every three years to remain in compliance with Title VI requirements. This section detailing Sun Metro’s service monitoring results are divided into six sections corresponding to the four standards and two policies established in Circular 4702.1B for service monitoring:

- Standards
 - Vehicle Load
 - Vehicle Headway
 - On-time Performance
 - Service Availability
- Policies
 - Distribution of Transit Amenities
 - Vehicle Assignment

Using the methodology and standards developed for each of these metrics in the Service Standards and Policies section of Sun Metro’s 2025 Title VI Program (set for the three-year period of 2023-2025), Sun Metro concludes that there are no disparate impacts in the level of service that it provides.

Methodology

For each reviewed bus route, we calculated the percentage of all persons residing in areas served by the route, who are minority persons. We defined the geographic area of coverage for each route by including all Census block groups within one half-mile walking distance of bus stops served by that route. For each route, we calculated the number of minority persons residing in all block groups served and determined the percentage of minority persons among all persons served by the route. If a route provides at least one-third of its service in a minority block group, it is classified as a minority route.

Sun Metro has 52 fixed routes, of which, 43 are identified as minority and low-income. Sun Metro monitored all routes during the morning peak (6:00 A.M. to 9:00 A.M.) for the month of August 2025.

Vehicle Load Monitoring

As defined by FTA Circular 4702.1B, *vehicle load* is expressed as the ratio of passengers to the total number of seats on a vehicle.

Analysis

Sun Metro’s System-wide Standards and Policies states a standard vehicle load factor of 1.50 passengers per trip during each peak service level. The frequency of service on a route is set so that the load standards are not exceeded on consecutive buses; however, they may be exceeded on the BRIO routes, specifically during peak hours. Load factors at or below the standards do not prevent the addition of service where loading requires passengers to stand for more than 15 minutes of their travel time.

Table 1 below shows passenger capacities for buses as the average maximum number of persons seated and standing during a weekday. The maximum load factors represent the maximum achievable capacity and are calculated by dividing the total seated and standing capacity by the seated capacity of the vehicle. For the purposes of this evaluation, weekday headways were calculated using morning peak service time. The weekday morning peak service period is 6:00 AM to 9:00 AM.

Table 1: Maximum Bus Load Standards

Average Passenger Capacities					
Vehicle Type	Seated	Standing	Total	Maximum Load Factor	Maximum Load
35' Standard	30	20	50	1.70	51
40' Standard	40	20	60	1.50	60
60' Standard	46	39	85	1.90	87

For this evaluation, daily boarding by route and trip data was collected from the following Sun Metro divisions:

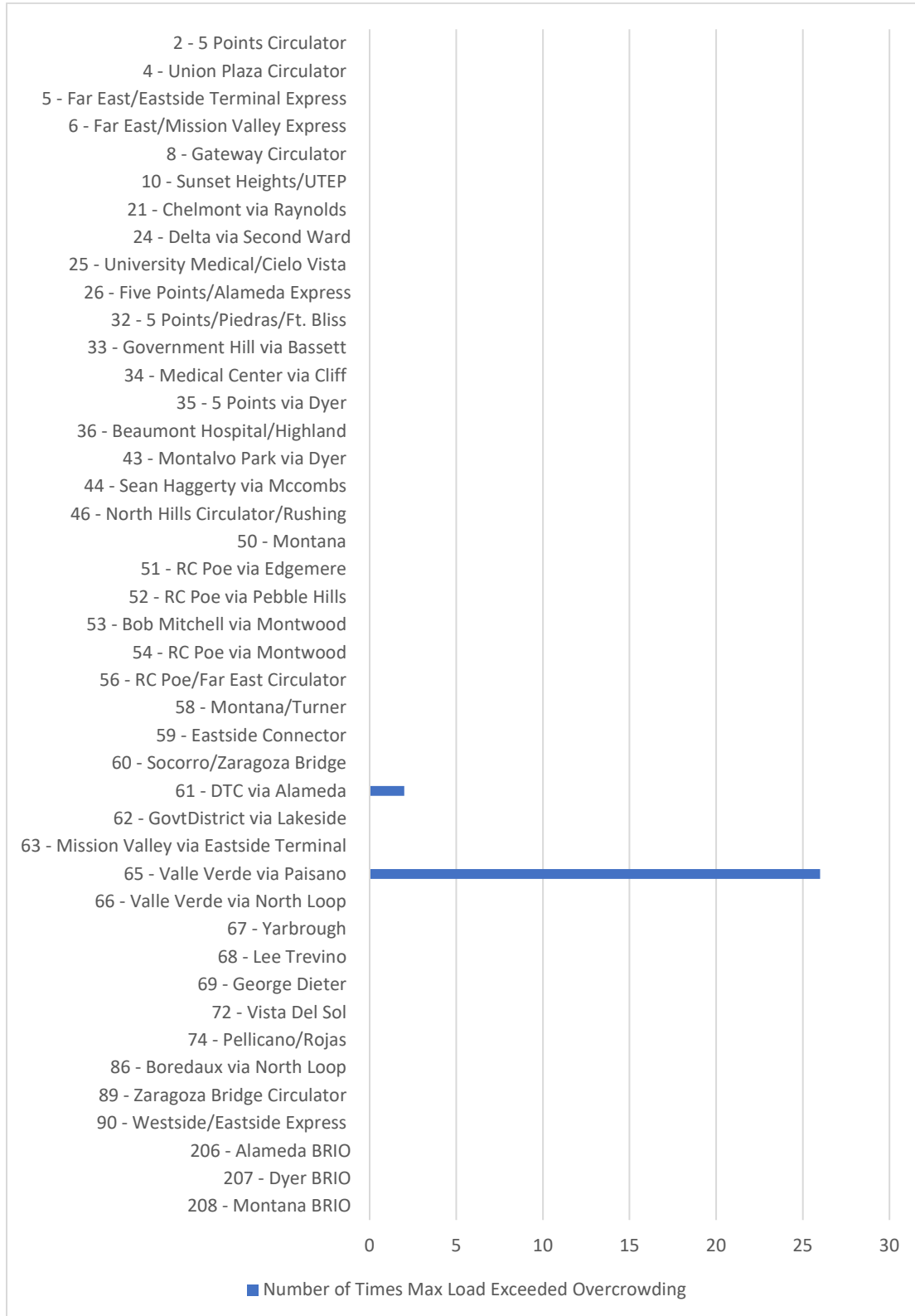
- Planning
- Scheduling
- Operations

Loads on Saturday and Sunday were excluded from the analysis since ridership is generally lower than weekday ridership, and weekend overloads are rare.

Vehicle Load Monitoring Results

Vehicle Load Monitoring was conducted for the period of September 1, 2025 to September 30, 2025, during the peak period of 6:00 AM to 9:00 AM. The maximum vehicle load for a 35-foot bus is limited to 51 passengers, a 40-foot bus is limited to 60 passengers, and a 60-foot bus is limited to 87 passengers. There was a grand total of 28 instances of overcrowding for a percentage of 0.5%. Chart 1 below shows there were two (2) routes that exceeded the maximum vehicle load during peak time. The routes were identified as 65 – Valle Verde via Paisano (26) and 61 – DTC via Alameda (2).

Chart 1: Vehicle Loads for Minority Routes – Number of Trips Exceeded the Vehicle Load



Source: Sun Metro Data Management Division

Vehicle Headway Monitoring

As defined by FTA Circular 4702.1B, *vehicle headway* is the amount of time between two vehicles traveling in the same direction on a given line or combination of lines and is measured in minutes.

Analysis

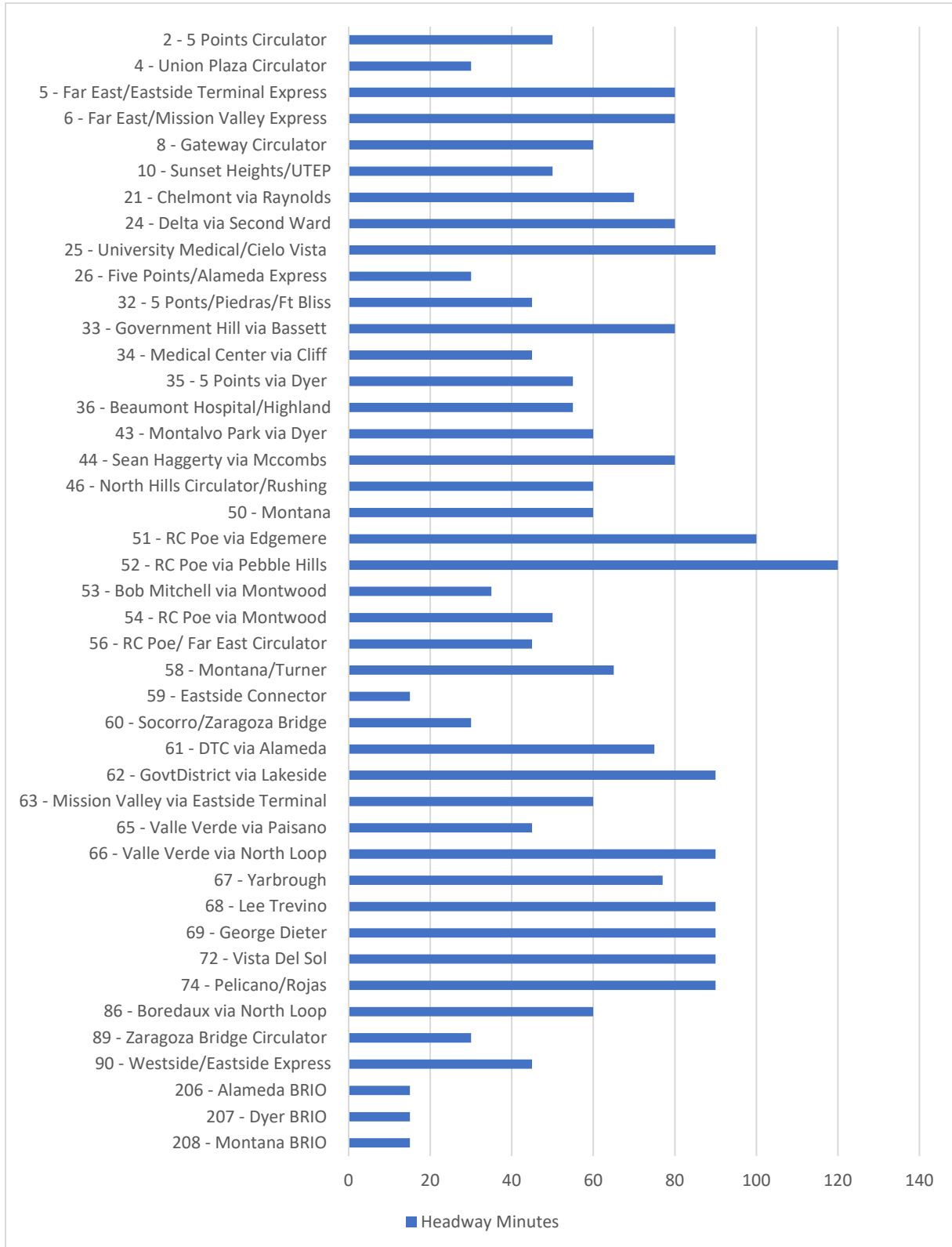
Sun Metro's vehicle headway standards allow maximum headways of 73.1 minutes for peak-period and 90.4 minutes for the base period. These times are consistent with industry standards.

Vehicle Headway Monitoring Results

Chart 2 below shows the weekday morning peak headways for all minority routes. The average headway is 74 minutes for all routes. In total, 4 routes have a peak frequency of 15 minutes (59-Eastside Connector, 206-Alameda BRIO, 207-Dyer BRIO, 208-Montana BRIO). An additional 4 routes (4-Union Plaza Circulator, 26-Five Points/Alameda Express, 60-Socorro/Zaragoza Bridge, 89-Zaragoza Bridge Circulator) have a peak frequency of 30 minutes or less. The remaining 35 routes have headway ranges between 35 and 120 minutes. Approximately 16 routes were above the 73.1-minute headway standard.

The Operations Division will conduct an analysis to determine whether the cause was due to factors outside of Sun Metro's control, such as accidents, construction detours, or mechanical failures. If the analysis indicates that the issue was related to operator performance, appropriate coaching will be provided to address and correct the concern. Sun Metro will continue to monitor headways for all routes to ensure they are meeting agency standards.

Chart 2: AM Peak Vehicle Headway for Minority Routes



On-time Performance Monitoring

As defined by FTA Circular 4702.1B, *on-time performance* is a measure of runs completed as scheduled.

Analysis

Sun Metro's on-time performance is defined as arriving within 0-4 minutes of the scheduled published time. A bus is considered late if it departs its scheduled "time point" 5 or more minutes later than the published time. Buses are considered early if they depart from a published time at any time prior to the scheduled departure. Sun Metro's on-time performance standard goal is 90% or better. Standards measured by Automatic Vehicle Locator (AVL) data are as follows:

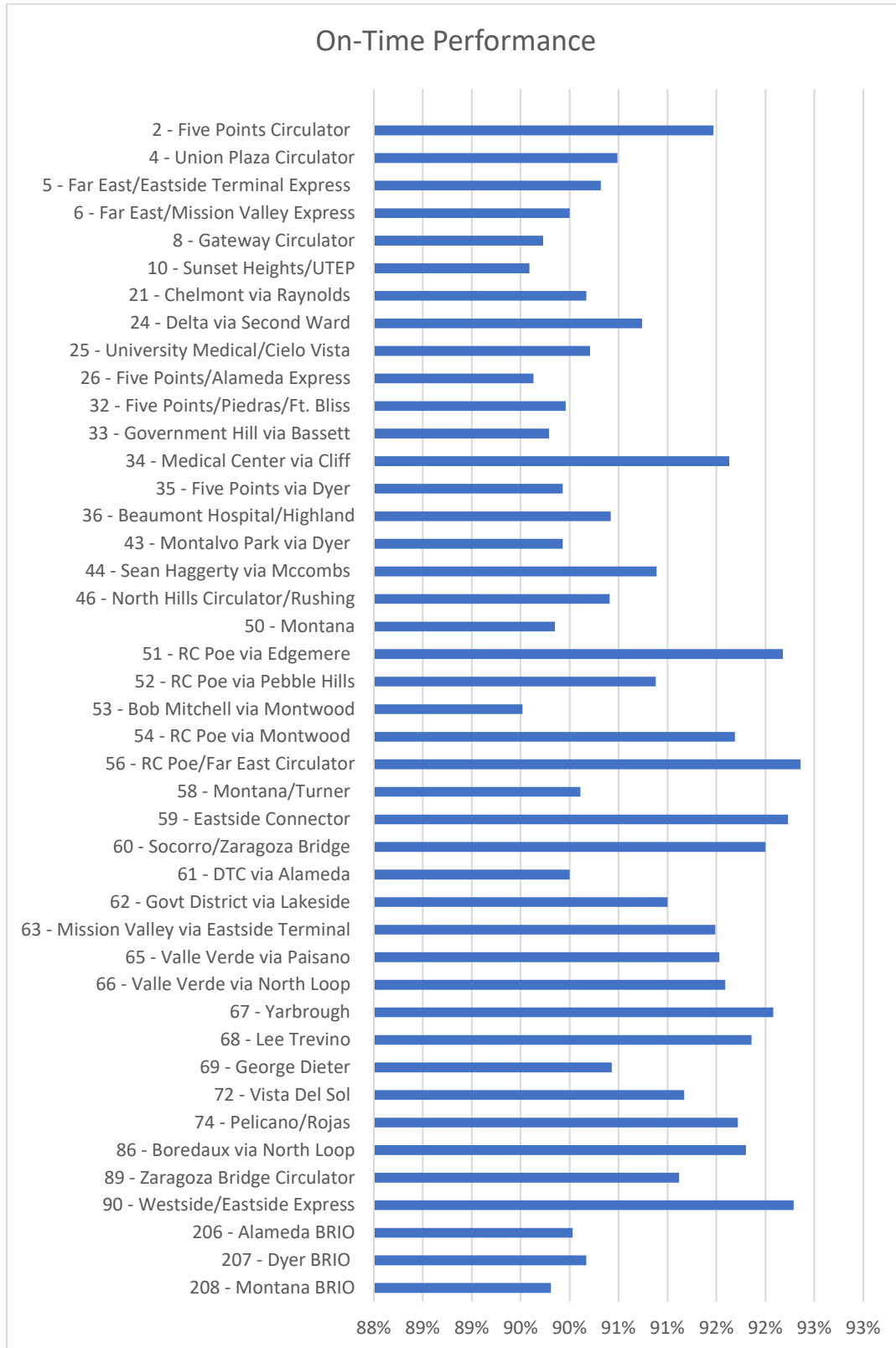
ON-TARGET:	90% or better
NEEDS IMPROVEMENT:	80% to 89%
FAIL	79% or less

Sun Metro compared every minority route's actual departure time against scheduled departure times. Sun Metro used AVL data to determine the weekday morning peak on-time performance percentage.

On-time Performance Monitoring Results

Chart 3 shows Sun Metro's average on-time performance is 90.8% for all routes. Routes that fall below the on-time performance standard shall be reviewed by Sun Metro's Operations Division, as well as Planning & Scheduling Division. The Operations Division will conduct an analysis to determine whether the cause was due to factors outside of Sun Metro's control, such as accidents, construction detours, or mechanical failures. If the analysis indicates that the issue was related to operator performance, appropriate coaching will be provided to address and correct the concern.

Chart 3: September 1, 2025 AM Peak On-time Performance



Service Availability Monitoring

As defined by FTA Circular 4702.1B, *service availability* is a general measure of the distribution of routes within a transit provider's service area.

Analysis

Sun Metro has established a goal that service should be provided for areas with a density of 2,000 to 3,000 persons per square mile. The Sun Metro goal is that service should be provided within one-half mile of 50 percent of the population. This established standard is appropriate to the Sun Metro level of service.

Currently, Sun Metro provides service availability for 67% of service area residents within one quarter mile of a bus stop and 72% for service area residents within one half mile of a bus stop with weekday all-day service.

Service Availability Monitoring Results

Table 2 below shows the percentage of minority and non-minority households served. The percentage of minority households within one quarter mile of a bus stop is 88%. The percentage of non-minority households within one quarter mile of a bus stop is 93%. The percentage of minority households within a half-mile walk of a bus stop is 98%. The percentage of non-minority households within one quarter mile of a bus stop is 2%.

Table 2: Service Availability Standard

Service Availability Standard	Minority	Non-minority
Within ¼ mile of a bus stop	88%	12%
Within ½ mile of a bus stop with weekday all-day service	98%	2%
Service area population	88%	12%

Transit Amenities Monitoring

As defined by FTA Circular 4702.1B, *transit amenities* refer to items of comfort, convenience, and safety that are available to the general riding public. These include bus stop benches, bus shelters, route maps/schedules, and trash receptacles.

Analysis

Sun Metro's policy states that bus shelters are distributed on a system-wide basis. The location of bus shelters is determined by factors such as level of service, stability of routes within the service network, site dimensions, pavement characteristics, position of route, transfer points, stops shared by multiple routes, proximity to major destinations, distribution of shelters on route, legacy shelters, and shelter requests from customers and the community. There are approximately 628 bus shelters. Each bus shelter has a bench, nighttime lighting, trash receptacle, and bus route information (maps and schedules).

Transit Amenities Monitoring Results

Not all of Sun Metro's bus shelters are located on minority bus routes. There are approximately 454 bus shelters along minority routes, out of a total of 628 bus shelters within the service area.

Vehicle Assignment Monitoring

As defined by FTA Circular 4702.1B, *vehicle assignment* refers to the process by which transit vehicles are placed into service in depots and on routes throughout the transit provider's system.

Analysis

Sun Metro is committed to maintaining a fleet until its buses reach their useful life age of 14 years. Sun Metro's fleet consists of 154 active vehicles, which includes 35-foot, 40-foot, and 60-foot buses of various makes and models. Vehicles are not assigned to a specific route. Any vehicle type, old or new, may appear on any route at any time. However, articulated vehicles are specifically assigned to Sun Metro's BRT line (BRIO) to accommodate higher ridership.

Table 4 lists vehicles by manufacturer, year, number of buses in fleet, and years in service.

Table 3: Sun Metro's Vehicle Fleet Information

Manufacturer	Manufactured Year	Number of Buses	Years in Service
NABI	2007	6	18
NABI	2008	26	17
NABI	2010	7	15
New Flyer	2014	34	11
New Flyer	2017	2	8
New Flyer	2018	24	7
New Flyer	2020	12	5
New Flyer	2021	8	4
New Flyer	2023	12	2
New Flyer	2024	19	1
GLAVALs	2025	4	<1
TOTAL		154	Average Age: 8

Vehicle Assignment Results

Vehicle Assignment Monitoring was conducted on September 2, 2025 during the peak period of 6:00 AM to 9:00 AM. Sun Metro's vehicle (bus) numbers refer to the make and model year. For this evaluation, the Daily Vehicle Assignment report was used to determine which vehicle was assigned to each weekday route. Table 4 below shows the Daily Vehicle Assignment report revealed vehicles of all type and ages were placed on minority routes throughout Sun Metro's service area. The vehicles are not assigned to specific routes or vehicles types to specific routes. Any vehicle type, old or new, may appear on any route at any time.

Table 4: Daily Vehicle Assignment Monitoring by Route for September 2, 2025

Route Number	Route	Minority Route	Block/Vehicle Number	Block/Vehicle Number	Block/Vehicle Number	Block/Vehicle Number	Block/Vehicle Number	TOTAL
4	Union Plaza Circulator	YES	401 / 24312	402 / 23301				2
7	Northeast / Eastside Terminal	NO	701 / 0931	702 / 0922	703 / 0917			3
10	Sunset Heights / UTEP	YES	1001 / 24107					1
14	Westwood	NO	1401 / 14419	1402 / 0905	1403 / 21304	1404 / 17301	1405 / 23305	5
15	Mesa	NO	1501 / 14418	1502 / 0907	1503 / 0914	1504 / 14418		3
19	Regier Circulator	NO	1901 / 24110	1902 / 24110				1
21	Chelmont via Reynolds	YES	2101 / 24311	2102 / 24311				1
24	Delta via Second Ward	YES	2401 / 23302	2402 / 23303				2
25	University Medical Center / Cielo Vista	YES	2501 / 24307					1
32	Five Points / Piedras / Fort Bliss	YES	3201 / 23310					1
33	Government Hill via Bassett Place	YES	3301 / 24104					1
34	Medical Center via Cliff	YES	3401 / 0916	3402 / 0929	3403 / 24302			3
35	Northgate via Dyer	YES	3501 / 14402	3502 / 14409				2
36	Beaumont Hospital / Highland	YES	3601 / 24304	3602 / 21301	3603 / 23309			3
43	Montaño Park via Dyer	YES	4301 / 24313					1
44	Sean Haggerty via McCombs	YES	4401 / 23304					1
46	North Hills Circulator / Rushing	YES	4601 / 21306					1
50	Montana	YES	5001 / 14403	5002 / 24317				2
51	RC Poe via Edgemere	YES	5101 / 21303					1
52	RC Poe via Pebble Hills	YES	5201 / 24309					1
53	Bob Mitchell via Montwood	YES	5301 / 14411	5302 / 24316				2
58	Montana / Turner	YES	5801 / 24310					1
59	Eastside Connector	YES	5901 / 14420	5902 / 14413	5902 / 18698	5903 / 14416	5904 / 14406	5
60	Socorro / Zaragoza Bridge	YES	6001 / 14420	6002 / 0925				2
61	Ysleta via Alameda	YES	6101 / 14405	6102 / 0915				2
62	Govt District via Lakeside	YES	6201 / 23306	6202 / 23306				1
63	Mission Valley via Eastside Terminal	YES	6301 / 0698	6302 / 23309	6303 / 21301			3
65	Valle Verde via Paicano	YES	6501 / 0911	6502 / 0682				2
66	Valle Verde via North Loop	YES	6601 / 24318					1
67	Yarborough	YES	6701 / 14412	6702 / 14412				1
68	Lee Trevino	YES	6801 / 0904					1
69	George Dieter	YES	6901 / 0685					1
72	Vista Del Sol	YES	7201 / 24303					1
74	Pellicano / Rojas	YES	7401 / 14404					1
86	Bordeaux via North Loop	YES	8601 / 23307	8602 / 0692				2
89	Zaragoza Bridge Circulator	YES	8901 / 0928	8901 / 0918				2
205	Mesa BRIO	NO	20501 / 14602	20502 / 14610	20503 / 18619	20504 / 18617	20505 / 14603	5
206	Alameda BRIO	YES	20601 / 20606	20602 / 20612	20603 / 18608	20604 / 18611	20605 / 18609	5
207	Dyer BRIO	YES	20701 / 18602	20702 / 20603	20703 / 18606	20704 / 18618	20705 / 20609	5
208	Montana BRIO	YES	20801 / 18607	20802 / 23601	20805 / 20614	20806 / 20611		4
								83

Source: Sun Metro Operations Division

Vehicle Assignment Results

Vehicle Assignment Monitoring was conducted on September 1, 2025 during the peak period of 6:00 AM to 9:00 AM. Table 4 above shows the Daily Vehicle Assignment report revealed vehicles of all type and ages were placed on minority routes throughout Sun Metro's service area. The vehicles are not assigned to specific routes or vehicles types to specific routes. Any vehicle type, old or new, may appear on any route at any time.

Summary of Monitoring Results

A summary of the results of each evaluation is shown in Table 5 below. No disparate impacts to minority populations were identified in these evaluations.

Table 5: Summary of Results

Standard	Minority Results
Vehicle Load	No Disparate Impact
Vehicle Headway	No Disparate Impact
On-Time Performance	No Disparate Impact
Service Availability	No Disparate Impact
Transit Amenities	No Disparate Impact
Vehicle Assignment	No Disparate Impact

4. Evaluate Service and Fare Changes

Construction Equity Analysis

Sun Metro prepares Advanced Planning Reports prior to the construction of its transit terminals. The Advanced Planning Report includes the following:

Transit Terminal Demand Analysis: Sun Metro investigates the feasibility of Park and Ride locations throughout the City to develop a series of service improvements that aid in maximizing system performance, making the system more attractive to users and leading to various operating efficiencies through the development of a network of transit transfer centers. The results of this demand analysis allow Sun Metro to implement a network of Park and Rides at various locations throughout the City to address rapid population growth and stimulate economic expansion.

Transit Terminal Site Selection Analysis: The Site Selection Analysis process included research and collection of demographic, site and other data; development of site requirements; development of evaluation criteria; evaluation of each site against criteria; and site recommendation.

Environmental Assessment: The Environmental Assessment is used to determine the project's environmental consequences (positive or negative) prior to the implementation decision. It proposes measures to adjust impacts to acceptable levels or to investigate solutions to mitigate any negative impacts.

In the future, when Sun Metro plans to construct or expand a facility, such as a vehicle storage facility, maintenance facility, transit hub or operation center, the agency will include a copy of the Title VI Equity Analysis conducted during the planning stage with regard to the location of the facility.

The following principles will be applied in the analysis:

- To avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority populations and low-income populations;
- To ensure the full and fair participation by all potentially affected communities in the transportation decision-making process; and
- To prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations.

Title VI Equity Analysis Policies and Procedures

Purpose

The Federal Transportation Administration requires Sun Metro to adopt Title VI Equity Analysis Policies. These include a Major Service Change Policy, Disparate Impact Policy, and Disproportionate Burden Policy. The purpose of service and fare equity analyses prior to implementing service and/or fare changes is to determine whether the planned changes will have a disparate impact on the basis of race, color, national origin or income.

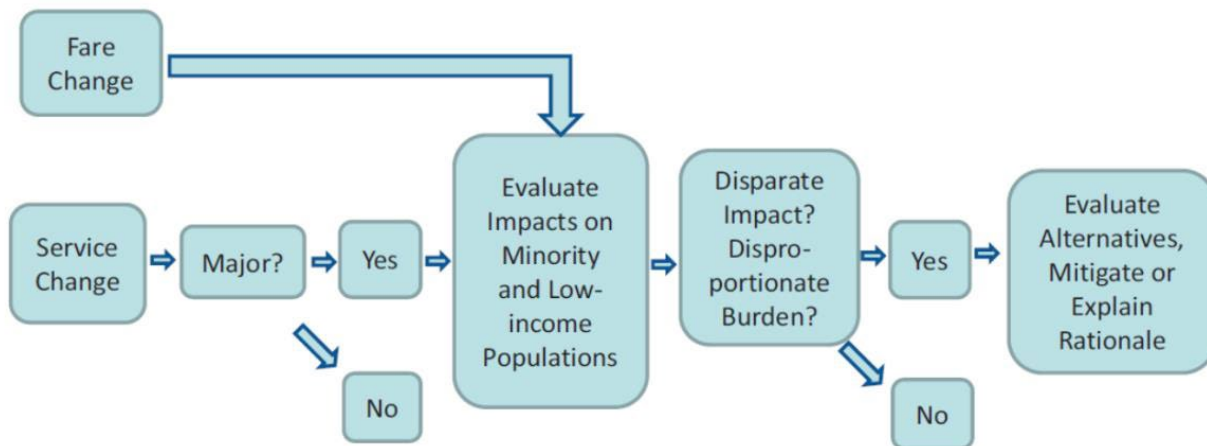
References

Title VI of the Civil Right Act of 1964, Section 601 states: “No person in the United States shall, on the grounds of race, color or national origin be excluded from participation in, or be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.”

The FTA requires applicants, recipients, and subrecipients of Federal assistance to certify compliance with the requirements of Title VI as part of the grant approval process. As part of that requirement, FTA Circular 4702.1B requires transit agencies that serve urbanized areas of 200,000 people or greater to evaluate significant system-wide service and fare changes at the planning and programming stages to determine whether proposed changes would have a discriminatory impact. For service changes, this requirement applies to “major service changes” only, and the recipient establishes guidelines or thresholds for what it considers a “major service change.”

Service and Fare Change Process

The chart depicted below explains the process of when to evaluate the impacts of a fare change or service change. In addition, the second chart explains the type of analysis required, depending on the populations affected by the fare and/or service change.



Title VI-Related Definitions

[Discrimination](#) refers to any action or inaction, whether intentional or unintentional, in any program or activity of a Federal-aid recipient, subrecipient, or contractor that results in disparate treatment, disparate impact, or perpetuating the effects of prior discrimination based on race, color, or national origin.

[Disparate Impact](#) refers to a facially neutral policy or practice that disproportionately affects members of a group identified by race, color, or national origin, where the recipient's policy or practice lacks a substantial legitimate justification and where there exist one or more alternatives that would serve the same legitimate objectives but with less disproportionate effect on the basis of race, color, or national origin.

[Disproportionate Burden](#) refers to a neutral policy or practice that disproportionately affects low-income populations more than non-low-income populations. A finding of disproportionate burden requires the recipient to evaluate alternatives and mitigate burdens where practicable.

[Disparate Treatment](#) refers to actions that result in circumstances where similarly situated persons are intentionally treated differently (i.e., less favorably) than others because of race, color, or national origin.

[Low-income Person](#) means a person whose median household income is at or below the U.S. Department of Health and Human Services (HHS) poverty guidelines. Recipients are encouraged to use a locally developed threshold, such as the definition found in 49 U.S.C. 5302 as amended by MAP-21: "refers to an individual whose family income is at or below 150 percent of the poverty line (as that term is defined in Section 673(2) of the Community Services Block Grant Act (42 U.S.C. 9902(2)), including any revision required by that section) for a family of the size involved" or another threshold, provided that the threshold is at least as inclusive as the HHS poverty guidelines.

[Limited English Proficient \(LEP\)](#) refers to persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. It includes people who reported to the U.S. Census that they speak English less than well, not well, or not at all.

[Low-income Population](#) refers to any readily identifiable group of low-income persons who live in geographic proximity, and, if circumstances warrant, geographically dispersed/transient persons (such as migrant workers or Native Americans) who will be similarly affected by a proposed FTA program, policy or activity.

[Minority](#) refers to a person or passenger who identifies as American Indian or Alaska Native, Asian, Black or African American, Hispanic or Latino (of any race), Native Hawaiian or Other Pacific Islander, or identifies as more than one race (multiracial) or some other race.

[Predominantly Minority Area](#) means a geographic area, such as a neighborhood, Census tract, block or block group, or traffic analysis zone, where the proportion of minority persons residing in that area exceeds the average proportion of minority persons in the recipient's service area.

Sun Metro Title VI Equity Analysis Policies

The major service change, disparate impact, and disproportionate burden policies were drafted collaboratively by Sun Metro staff. A variety of informational items and data were used in the determination of these draft policies:

- Policies in place at peer transit agencies across the United States.
- Data availability and ease of application to determine when a major service change is proposed.
- Census data analysis on the demographic and socio-economic composition of the population in the service area.

Major Service Change Policy

All major increases or decreases in transit service are subject to a Title VI Equity Analysis prior to MTDB approval of the service change. A Title VI Equity Analysis completed for a major service change must be presented to the Sun Metro Transit Board of Directors for its consideration and included in the Sun Metro Title VI Program with a record of action taken by the MTB.

Sun Metro has defined a major service change as a reduction or increase of 30 percent or more in total vehicle revenue miles or total revenue hours in service in any service area during a service review period.

The following service changes are exempted:

- Changes to a service on a route with fewer than 20 total trips per unit are not considered "major" unless service on that route is eliminated completely on any such day.

- The introduction or discontinuation of short- or limited-term service (e.g., promotional, demonstration, seasonal or emergency service, or service provided as mitigation or diversions for construction or other similar activities), as long as the service will be/has been operated for no more than twelve months.
- Sun Metro-operated transit service that is replaced by a different mode or operator providing a service with the same or better headways, transfer options, the span of service, and stops.
- Deactivation of a route if it does not reach above 10 passengers per hour or 1.0 passenger per mile after 6 months' period of implementation.

Disparate Impact Policy

This policy establishes a threshold for determining whether a given action has a disparate impact on minority populations. In the course of performing a Title VI Equity Analysis, Sun Metro must analyze how the proposed action would impact minority populations as compared to nonminority populations.

In the event the proposed action has a negative impact that affects minorities more than non-minorities with a disparity that exceeds the adopted Disparate Impact Threshold, or that benefits non-minorities more than minorities with a disparity that exceeds the adopted Disparate Impact Threshold, Sun Metro must evaluate whether there is an alternative that has a more equitable impact.

Otherwise, Sun Metro must take measures to mitigate the impact of the proposed action on the affected minority population and demonstrate that a legitimate business purpose cannot otherwise be accomplished and that the proposed change is the least discriminatory alternative.

The Disparate Impact Threshold is utilized to determine if the adverse impacts of a major service change (as defined in the first part of this document) or a fare adjustment is established over 25 percent based on the cumulative impact of the proposed service and/or fare changes. This threshold applies to the difference between the impacts borne by minority populations compared to the same impacts borne by non-minority populations.

Disproportionate Burden Policy

This policy establishes a threshold for determining whether a given action has a disproportionate burden on low-income populations versus non-low-income populations. The Disproportionate Burden Policy applies only to low-income populations that are not also minority populations.

The Sun Metro Disproportionate Burden Threshold is utilized to determine if the adverse impacts of a major service change (as defined in the first part of this document) or a fare adjustment is established over 25 percent based on the cumulative impact of the proposed service and/or fare changes. This threshold applies to the difference of the impacts borne by low-income populations compared to the same impacts borne by non-low-income populations.

Sun Metro Service and Fare Modifications

Sun Metro will present all service/fare modifications to the Citizen's Advisory Committee and the Mass Transit Department Board. All presentations will be notated for future reference.

The following service modifications occurred during the 2023-2025 time period and were exempt from conducting a major analysis:

- February 19, 2023
- July 30, 2023
- August 13, 2023
- February 11, 2024
- October 6, 2024

On February 11, 2025, an explosion resulting in a fire severely impacted Sun Metro's maintenance operations, leading to a temporary reduction in service to comply with federal vehicle maintenance regulations. Following the incident, Sun Metro adjusted its operations to ensure compliance with federal transit safety regulations, which require systematic inspections, preventative maintenance, and repairs to maintain buses in safe operating conditions.

Since the fire, Sun Metro has operated all Brio routes on a modified schedule and most fixed routes on a Sunday/Holiday schedule. This modified schedule was in effect until February 22, 2025. Sun Metro set-up temporary maintenance operations at the Union Depot in Downtown El Paso to service vehicles.

No fare changes occurred during the 2023-2025 time period.

Grants, Reviews, and Certifications

Pending FTA Grants

- 2025 Rebuilding American Infrastructure with Sustainability and Equity (RAISE – USDOT)
- 2024 Section 5310: Enhanced Mobility of Seniors and Individuals with Disabilities (Pass through from local MPO)
- TX-2025-036-01-00: Sun Metro Paratransit Fleet Replacement – Zero Emission Vehicles
- 1539-2024-6-P1: FY2024, 5339 Low/No Emission Competitive Program, Capital Rolling Stock Replacement
- 1539-2024-3-P1: El Paso Sun Metro Micro Transit Project
- 1539-2024-2-P1: 2026 Bike Plan – BRIO First-Last Mile Update

Pending Application for Financial Assistance

Sun Metro does not have any pending applications for financial assistance from any federal agency other than the FTA.

Open FTA Grants

- TX-2022-020: Ride Sun Metro Contactless Payment Project
- TX-2024-004: Sun Metro Rising – American Rescue Plan (ARP) Act, 5307 FY21 Planning
- TX-2022-010: El Paso Sun Metro FY20 Competitive HOPE (5305) Program Feasibility Study and Alternatives Analysis for Regional Fare Structure and Payment System
- TX-03-0307: El Paso Dyer Corridor RTS
- TX-03-0308: El Paso Dyer Corridor RTS
- TX-04-0099: Mesa Corridor BRT/RTS project
- TX-2017-033: FY15 & FY16 5339 Bus & Facility Funding
- TX-2017-048: FY15-FY16 5307 Formula Funding Grant
- TX-2018-036: FY17 5339 Bus & Facilities Apportionment - 1539
- TX-2020-024: El Paso Sun Metro FY18 5339
- TX-2020-032: El Paso Sun Metro CIG Funding Montana BRT/RTS Corridor
- TX-2020-052: Sun Metro El Paso (1539) FY 20 5307 Planning and Capital Items
- TX-2020-099: El Paso Sun Metro FY19 & FY20 5339 Vehicle Purchases
- TX-2022-071: El Paso Sun Metro FY21 5339 Capital Funding
- TX-2023-105: El Paso Sun Metro FY22 Formula 5307 Planning, ADA Paratransit Service, and Capital Items
- TX-2023-107: El Paso Sun Metro FY21 5307 Planning, ADA Paratransit Service, and Capital Items
- TX-2024-015: El Paso Sun Metro FY22 5339 Capital Funding (Stations, Stops, Terminals; Support Equip; Bus Assoc. Transit Improv.)
- TX-2024-020: El Paso Sun Metro Montana RTS (BRT) Operating Assistance- FY23 CMAQ

- TX-2024-067: El Paso Sun Metro FY23 5307 Planning, ADA Paratransit Service, Buses, and Other Capital Items
- TX-2024-087: El Paso Sun Metro FY23 5339 Capital Funding
- TX-39-0009: El Paso Dyer Corridor RTS

Civil Rights Compliance Reviews in the Past 3 Years

The last Civil Rights compliance review was conducted with Sun Metro's Triennial Review, which concluded in February 2024.

Recent Annual Certifications and Assurances

Completed on May 29, 2025

Previous Triennial Review Findings

No deficiencies were found with the FTA requirements for Title VI.

Contact

For additional information on Sun Metro's Title VI Program or its efforts to comply with the Civil Rights Act of 1964 or Executive Order 13166: Improving Access to Service for Persons with Limited English Proficiency, please contact:

Jerry DeMuro, Deputy Transit Officer
Sun Metro
10151 Montana Ave
El Paso, Texas 79925
(915) 212-3333
DeMuroG@elpasotexas.gov

Appendix

- A. Sun Metro Discrimination Complaints Process Policy
- B. Title VI/LEP Training PPT
- C. Fire Incident Press Releases
- D. Mass Transit Department Board Meeting Minutes
- E. Sun Metro Certifications & Assurances

Appendix A. Sun Metro Discrimination Complaints Process Policy



Discrimination Complaints Process

The City of El Paso – Sun Metro does not promote or tolerate discrimination. Sun Metro has established a process through which allegations of discrimination are investigated and resolved.

Complaint Submission

If someone believes they have suffered from discrimination (includes race, color, sex, national origin, age, disability, religion, or genetic information) under a Sun Metro program of transit service delivery or related benefits, they may contact Sun Metro to seek an informal resolution. If the matter cannot be resolved informally, the following steps will be utilized:

- Within 180 days of the alleged discrimination, complainants may submit a written or verbal complaint to Sun Metro. Complaints must include the complainant's name (can also be listed as anonymous), the nature of the complaint, the date of the alleged discrimination, requested action, and contact information.
- Complainants may submit a complaint in-person, by mail or over-the-phone with:

Sun Metro
Attn: Customer Service – Nondiscrimination
10151 Montana Ave.
El Paso, TX 79925
(915) 212-3333

If a complainant prefers to submit a complaint by e-mail, the complainant may call Sun Metro at (915) 212-3333, and an appropriate e-mail address will be provided.

Complainants may also file a complaint with the FTA Office of Civil Rights:

Email: FTACivilRightsCommunications@dot.gov
(with "FTA complaint form" in the subject line)

U.S. Mail: Federal Transit Administration
Office of Civil Rights
Attn: Complaint Team
East Building, 5th Floor – TCR
1200 New Jersey Ave., SE
Washington, D.C. 20590

Phone: 1-888-446-4511



- If a complainant has a disability, the complainant may obtain information about the complaint process in alternative formats such as large print, audio, or accessible electronic formats.
- If a complainant has limited English proficiency, the complainant may obtain information about the complaint process by requesting a qualified foreign language interpreter and information written in other languages to ensure meaningful access to programs and activities. If a complainant requires these services, they may contact:

David Garcia
Business and Customer Service Assistant Manager
GarciaDX3@elpasotexas.gov
(915) 212-3333

Complaint Review and Processing

- Sun Metro will review each complaint and may request additional information from the complainant as needed. If additional information is requested and not received, the complaint may be closed. The complaint may also be closed if the complainant no longer wishes to pursue the complaint.
- Complaints will be recorded in an electronic log maintained by Sun Metro containing the complainant's contact information, nature of the complaint, date of submission, and results of the investigation. Log will be retained on an ongoing basis, and will not be purged. Information contained in log will be considered confidential and it will be stored on the City's network with access limited to Sun Metro staff designated by the Director.
- Any complaint received within the jurisdiction of Sun Metro will be promptly and impartially investigated. Sun Metro's goal is to initiate an investigation of all complaints within 25 days of receipt, though the time to carefully investigate complaints may be longer depending on the nature and complexity of the complaint.
- Note: When possible, every effort will be made to resolve a complaint informally. In a case where an informal accommodation may be made to complainant, the complainant may choose to withdraw the complaint, and the complaint will be closed and the withdrawal recorded in the log.

Complaint Investigation

All complaints will be investigated promptly. Reasonable measures will be undertaken to preserve any information that is confidential. Sun Metro will review every complaint and assign a neutral party to investigate. Neutral shall mean an individual employed by Sun Metro not assigned to the



particular operation in question, or a qualified individual not employed by Sun Metro. At a minimum, the investigating officer will:

- Identify and review all relevant documents, practices, and procedures;
- Identify persons with knowledge of the complaint, including but not limited to the complainant, witnesses, or any person identified by the complainant, or who may have been subject to similar activity, and provide an invitation to be interviewed in person or by phone; and
- Sun Metro will inquire whether the complainant has filed the complaint with another agency, such as FTA Office of Civil Rights, to prevent duplicative investigations. If the complainant has submitted a duplicate complaint, Sun Metro will contact the relevant agency to cooperate and coordinate with in the investigation.

Upon completion of the investigation, Sun Metro will complete a final report summarizing the findings for the Director of Mass Transit. If a civil rights violation is found to exist, remedial steps as appropriate and necessary, will be implemented. The complainant will receive a final report, that identifies any remedial actions implemented by Sun Metro in accordance with City policies and procedures. The investigation process and final report is expected to be completed within 45 days of receipt, unless exceptional circumstances warrant an extended investigation and reporting period.

Public Notice

Sun Metro will ensure notice is posted at all transit center locations, informing the public of its nondiscrimination policy and how to submit a complaint. The notice will also be posted in Spanish, in order to accommodate persons with limited English proficiency.

Appendix B: Title VI/LEP Training PPT



CITY OF EL PASO

Sun Metro Title VI Training

Last Updated January 23, 2025

What is Title VI?

Title VI of the Civil Rights Act of 1964 protects people from discrimination based on race, color or national origin in programs or activities that receive Federal financial assistance.

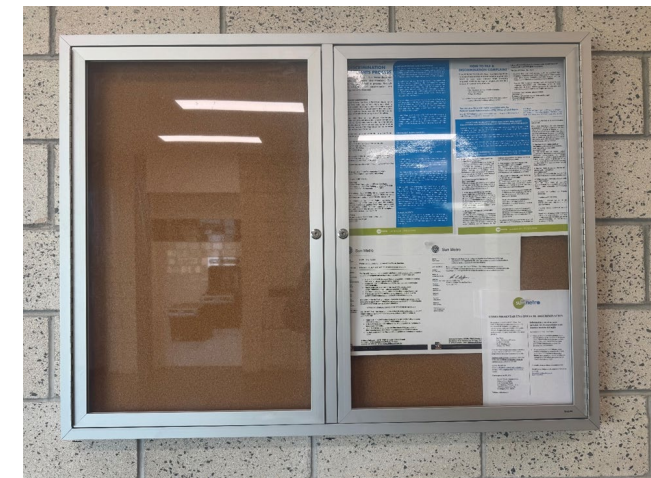
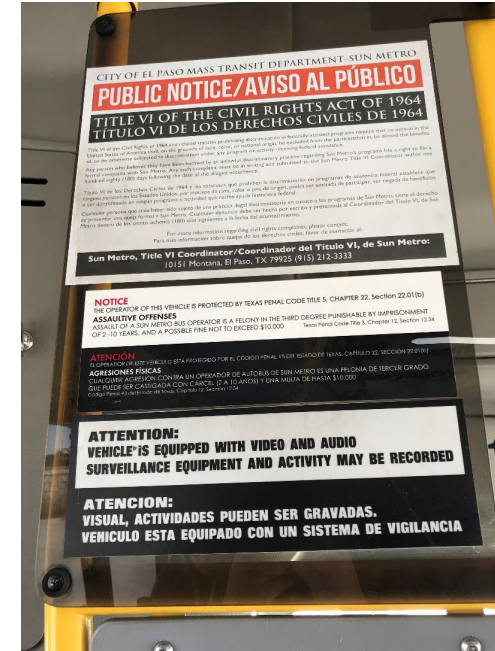
In addition to Title VI, Sun Metro also prohibits discrimination based on sex, age, disability, religion or any other protected classes as described in State or Federal laws. For the purpose of this training, Title VI is the main focus.

Why is Title VI Important?

- Ensures that public services, including transportation, are provided in a nondiscriminatory manner.
- Requires opportunities for public participation in decision-making without regard to race, color, or national origin, including populations with Limited English Proficiency (LEP).
- Title VI non-compliance can cause federal funding to be conditioned or withheld.

Notice to Beneficiaries

- Sun Metro is committed to ensuring that the public is aware of the rights and protections afforded to them under Title VI.
- Notice regarding Sun Metro's Civil Rights Policy has been disseminated throughout the bus and streetcar systems in both English and Spanish.
- The materials include posters displayed at transit terminals, printed and digital notifications on revenue vehicles, as well as on Sun Metro's website.



Complaint Form

Sun Metro has established a process for system users to file a complaint under Title VI. Any person who believes they have been discriminated against on the basis of race, color, or national origin may fill out a complaint form. Forms are available on Sun Metro's website.

Complaint Form (cont'd)



Discrimination Complaint Form
Formulario de Reclamo por Discriminación

Name (Nombre) _____
Address (Dirección) _____
City (Ciudad) _____ State (Estado) _____ Zip (Código Postal) _____
Telephone (Teléfono): Home (Casa) _____ Work (Trabajo) _____
Cell (Celular) _____
Email address (Correo electrónico) _____

Basis of Complaint: Mark all that applies.
(Fundamento(s) del reclamo: Marque todo lo que corresponda):

☐ Race (Raza)	☐ Disability (Discapacidad)
☐ Color (Color)	☐ Sex (Sexo)
☐ National Origin (Nacionalidad)	☐ Age (Edad)

How were you allegedly discriminated against? (¿Cómo ocurrió el presunto acto de discriminación?)

Who allegedly discriminated against you?
(¿Quién considera usted que ejerció discriminación contra usted?)

Name of Organization (Nombre de la organización) _____
Address (Dirección) _____
City (Ciudad) _____ State (Estado) _____ Zip (Código Postal) _____
Telephone (Teléfono): _____

Where did the alleged discrimination occur? (¿Dónde ocurrió el presunto acto de discriminación?)

Date/s and times discrimination occurred
(Fecha(s) y hora (s) cuando ocurrió (ocurrieron) el (los) presunto(s) acto (s) de discriminación)

First time (Primera Vez) _____
Second time (Segunda Vez) _____
Third time (Tercera Vez) _____

Were there any other witnesses to the alleged discrimination?
(¿Hubo testigos del presunto acto de discriminación?)

Name (Nombre)	Work Telephone (Teléfono del trabajo)	Home Telephone (Teléfono de la casa)	Cell Telephone (Teléfono celular)

What can the Department do to resolve the complaint?
(¿Qué podemos hacer para solucionar esta queja?)

Have you already filed this or other complaint before?
(¿Había presentado usted la misma o cualquier otra queja antes?)

Who? (¿Con quién?) _____
When? (¿Cuándo?) _____
Complaint number, if known (Número de caso, si lo sabe) _____

Signature (Firma) _____ Date (Fecha) _____

Mail to: Title VI Coordinator
Envío a: 10151 Montana Avenue
El Paso, TX 79925-1515

Active Lawsuits, Complaints or Inquiries Alleging Discrimination

Currently, there are no complaints pending that allege discrimination on the grounds of race, color, national origin or any other form of discrimination.

Sun Metro's Public Participation Plan

Sun Metro uses the El Paso Metropolitan Planning Organization's Public Participation Program, which was revised September 20, 2024 and is available at:

<https://www.elpasompo.org/media/PublicParticipationPlan/PublicParticipationPlan.pdf>

The plan incorporates the following outreach efforts which help alert riders and encourage engagement:

- Newspapers and other periodicals
- Bus and bus shelter advertisements
- Website
- Social Media
- Public Hearings/Public Information Sessions

Public Comments

All comments received through the public participation plan are given careful, thoughtful consideration. Due to a number of different ways system users or community members can comment on proposed service or fare changes (mail, email, social media, public meetings and others), all comments are assembled into a single document for presentation to the Mass Transit Department Board for consideration.

Construction Equity Analysis

Sun Metro prepares advanced planning reports prior to the construction of transit-related facilities. This includes:

- Transit Terminal Demand Analysis: review of service improvements.
- Transit Terminal Site Selection Analysis: research and collection of demographic data.
- Environmental Assessment: determine any environmental consequences and investigates solutions to mitigate any negative impacts.

Title VI Equity Analysis Policies and Procedures

The Federal Transit Administration (FTA) requires Sun Metro to adopt Title VI Equity Analysis Policies. These include:

- Major Service Change Policy;
- Disparate Impact Policy; and
- Disproportionate Burden Policy.

The purpose of service and fare equity analyses prior to implementing service and/or fare changes is to determine whether the planned changes will have a disparate impact on the basis of race, color, national origin or income.

Title VI Equity Analysis Policies and Procedures (cont'd)

FTA Circular 4702.1B requires transit agencies that serve urbanized areas of 200,000 people or greater to evaluate significant system-wide service and fare changes at the planning and programming stages to determine whether proposed changes would have a discriminatory impact.

For service changes, this requirement applies to “major service changes” only, and the recipient establishes guidelines or thresholds for what it considers a “major service change.”

Major Service Change Policy

- All major increases or decreases in transit service are subject to a Title VI Equity Analysis and must be presented to the Sun Metro Mass Transit Department Board (MTDB).
- Sun Metro has defined a major service change as a reduction or increase of *30 percent* or more in total vehicle revenue miles or total revenue hours in service in any service area during a service review period.

Disparate Impact Policy

According to the FTA, ***Disparate Impact*** refers to a facially neutral policy or practice that disproportionately affects members of a group identified by race, color, or national origin, where the recipient's policy or practice lacks a substantial legitimate justification and where there exist one or more alternatives that would serve the same legitimate objectives but with less disproportionate effect on the basis of race, color, or national origin.

Sun Metro's policy establishes a ***25 percent*** threshold for determining whether a given action has a disparate impact on minority populations.

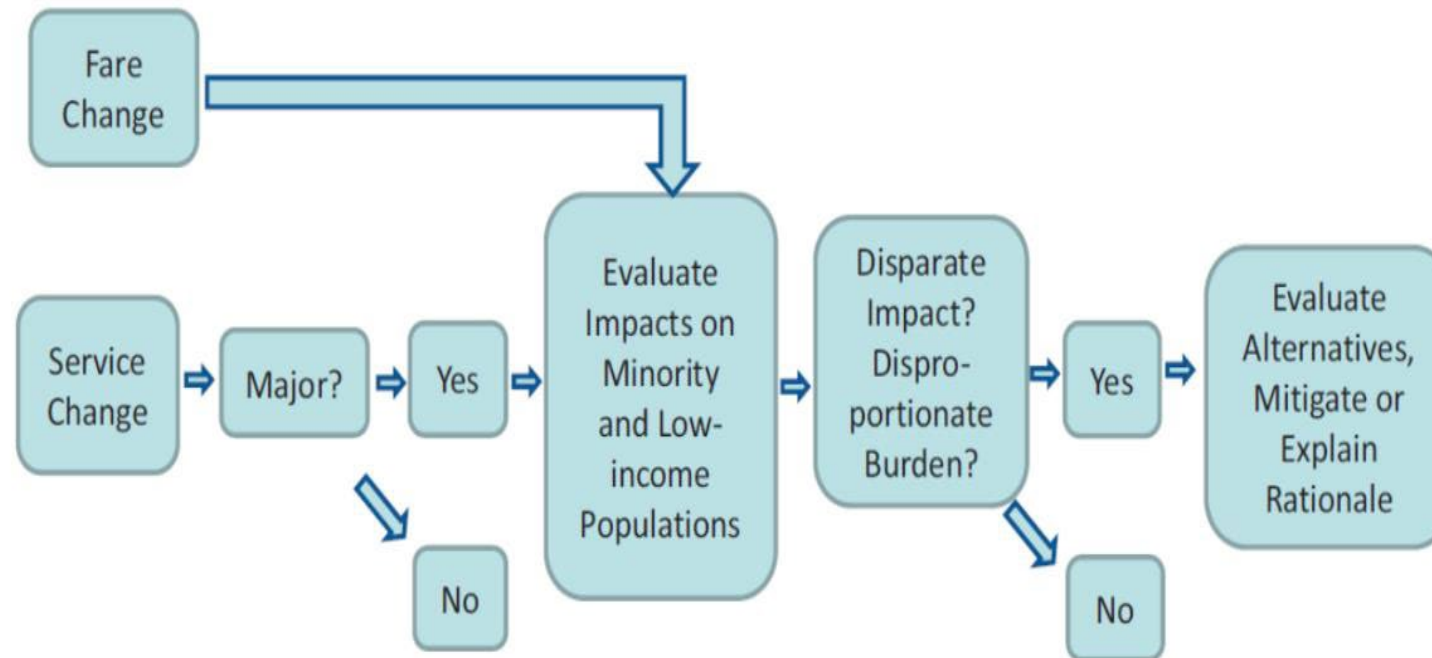
Disproportionate Burden Policy

According to the FTA, ***Disproportionate Burden*** refers to a neutral policy or practice that disproportionately affects low-income populations more than non-low-income populations. A finding of disproportionate burden requires the recipient to evaluate alternatives and mitigate burdens where practicable.

Sun Metro's policy establishes a ***25 percent*** threshold for determining whether a given action has a disproportionate burden on low-income populations versus non-low-income populations.

Service and Fare Change Process

The following chart depicts the overall process to conduct a fare or service change.





CITY OF EL PASO

Limited English Proficiency (LEP)

What Does LEP Mean?

- English is **not** the primary language.
- Limited ability to read, speak, write, or understand English.
- LEP individuals are among the most transit-dependent, but they are also choice riders.
- Outreach to dependent communities is a way to increase ridership without adding service or increasing fares.

Executive Order 13166

“Improving Access to Services for Persons with Limited English Proficiency” requires each federal agency to:

- Examine the services it provides;
- Develop and implement a system by which LEP persons can meaningfully access those services;
- Ensure that recipients of federal financial assistance provide meaningful access to their LEP beneficiaries.

El Paso County Population

Total Population: 865,657

Total Population of LEP Individuals: 27%

Speak English Less Than "Well"	El Paso County, Texas Estimate
Spanish or Spanish Creole	229,152
German	828
Korean	867
Chinese	775
Arabic	450
Tagalog	531
French (incl. Patois, Cajun)	276
Other Indic Languages	272
Japanese	176
Vietnamese	351
Other Asian Languages	213
Other Pacific Island Languages	158
Persian	247
Gujarati	101
Italian	82
Urdu	102
Thai	29
Hindi	7
Mon-Khmer (Cambodian)	38
Portuguese or Portuguese Creole	39
Other Native North American Languages	23
French Creole	29
Russian	100
Greek	9
Hebrew	21
Polish	5
Laotian	0
Other Slavic Languages	11
Armenian	14
Other West Germanic Languages	0
Hungarian	22
African Languages	90
Hmong	0
Navajo	15
Other and Unspecified Languages	10
Other Indo-European Languages	15
Scandinavian Languages	0
Serbo-Croatian	128
Yiddish	0

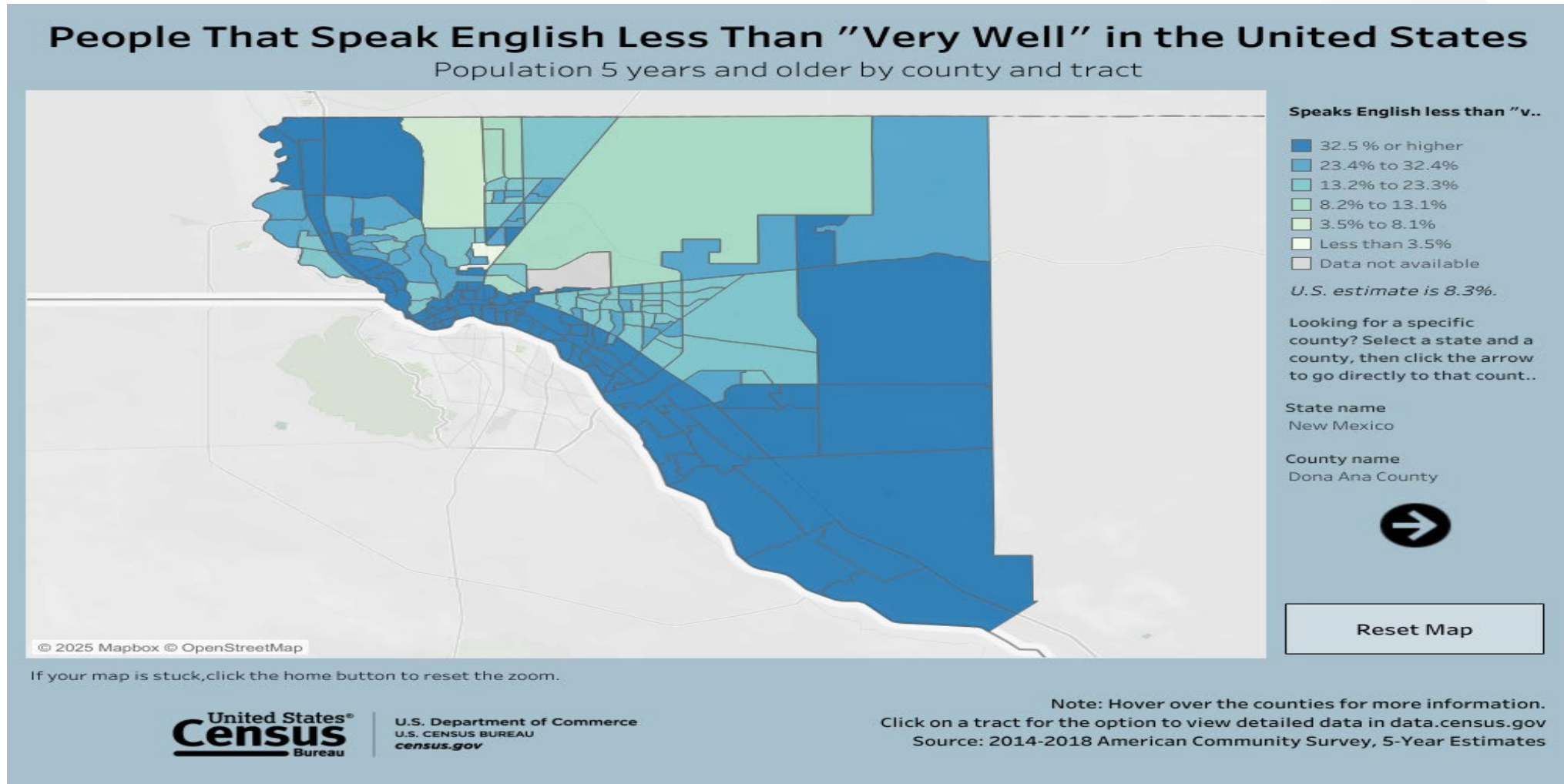
U.S. Census 2015: American Community Survey 5-Year Estimate Data

The LEP Community

While the need to provide language services to the Spanish-speaking population in the Sun Metro service area is crucial, it is also helpful to understand where populations of limited English proficiency reside.

The following map provides a spatial display of residents who report speaking English “less than well.”

The LEP Community



Language Assistance

- If the person can speak some English, try to discern their needs without the help of language service;
- If the employee cannot effectively communicate with the person, refer the individual to the Title VI Notice, where they can obtain Sun Metro's Customer Service number for further assistance.

Contact

For additional information on Sun Metro's Title VI Plan or its efforts to comply with the Civil Rights Act of 1964 or Executive Order 13166: Improving Access to Service for Persons with Limited English Proficiency, please contact:

Jerry DeMuro
Title VI Liaison
Sun Metro
10151 Montana Ave
El Paso, Texas 79925
(915) 212-3470

DeMuroG@elpasotexas.gov



CITY OF EL PASO

Questions?

Quiz: Question #1

What does Title VI protect?

- ☐ Race
- ☐ Color
- ☐ National Origin
- ☐ All of the Above

Quiz: Question #1

What does Title VI protect?

- ☐ Race
- ☐ Color
- ☐ National Origin
- ☒ *All of the Above*

Quiz: Question #2

Where can an individual access the Title VI Complaint Form?

- ☐ On the bus
- ☐ City Hall
- ☐ Sun Metro's website
- ☐ Local police station

Quiz: Question #2

Where can an individual access the Title VI Complaint Form?

- ☐ On the bus
- ☐ City Hall
- ☒ *Sun Metro's website*
- ☐ Local police station

Quiz: Question #3

If an individual speaks English “less than well,” they are considered to be LEP. What does this acronym stand for?

- ☐ Limited Educational Possibilities
- ☐ Limited English Proficiency
- ☐ Limited Excellence in Professionalism
- ☐ Limited English Person

Quiz: Question #3

If an individual speaks English “less than well,” they are considered to be LEP. What does this acronym stand for?

- ☐ Limited Educational Possibilities
- ☒ *Limited English Proficiency*
- ☐ Limited Excellence in Professionalism
- ☐ Limited English Person

Quiz: Question #4

What qualifies as a Major Service Change?

- ☐ 30% reduction in bus service
- ☐ 10% increase in bus service
- ☐ 5% reduction in bus service
- ☐ All of the above

Quiz: Question #4

What qualifies as a Major Service Change?

- ☒ *30% reduction in bus service*
- ☐ 10% increase in bus service
- ☐ 5% reduction in bus service
- ☐ All of the above

Appendix C: Sun Metro Fire Incident Press Releases



MAYOR
Renard U. Johnson

CITY MANAGER
Dionne Mack

CITY COUNCIL

District 1
Alejandra Chávez

District 2
Dr. Josh Acevedo

District 3
Deanna M. Rocha

District 4
Cynthia Boyar Trejo

District 5
Ivan Niño

District 6
Art Fierro

District 7
Lily Limón

District 8
Chris Canales

**NEWS
RELEASE**

02/19/2025

Sun Metro to Restore Service to Near Standard Level to Better Serve El Paso

Service Modifications Begin February 23, 2025

EL PASO, Texas—Sun Metro will expand service beginning on Sunday, February 23, 2025, by adding more routes, extending hours and increasing frequency, as part of ongoing efforts to restore bus service following a fire at its Transit Operations Center.

The current modified service schedule will remain in effect until Saturday, February 22, 2025.

“The restoration of these additional routes increase current service from 11 routes to 48 routes out of the 52 routes Sun Metro normally operates during weekdays,” said Sun Metro Director Anthony DeKeyzer. “This expansion will improve access to jobs, schools, medical care, and other essential services. We appreciate our passengers’ patience and understanding as we continue working toward full service restoration.”

On February 11, 2025, a fire severely impacted Sun Metro’s maintenance operations, leading to a temporary reduction in service to comply with federal vehicle maintenance regulations. Tragically, five Sun Metro employees were hospitalized due to the incident, and one later succumbed to his injuries. The cause of the fire remains under investigation.

Following the incident, Sun Metro adjusted its operations to ensure compliance with federal transit safety regulations, which require systematic inspections, preventive maintenance, and repairs to maintain buses in safe operating conditions.

Since the fire, Sun Metro has operated:

- All Brio routes on a modified schedule
- Most fixed routes on a Sunday/Holiday schedule
- Amistad routes on their regular schedule

This modified schedule will remain in effect through Saturday, February 22, 2025.

Sun Metro has set up temporary maintenance operations at the Union Depot in Downtown to service vehicles.

Upcoming Service Modifications

Regular Sunday service starts Sunday, February 23, and Monday, February 24, 2025, Sun Metro will introduce a Modified Weekday and Saturday Schedule, gradually increasing service levels:

- Sunday, February 23, 2025 – Regular Sunday schedule resumes
- February 24 - 28, 2025 – Modified Weekday Schedule starts
- Saturday, March 1, 2025 – Modified Saturday Schedule starts

Routes Returning on February 24, 2025

Modified Weekday Schedule (Effective Monday, February 24)

Please note: Routes 2, 16, 25, and 60 will not operate under this schedule.

—more—



Promoting **Transparent & Consistent Communication**
Among All Members of the Community

Media Contact: Laura Cruz Acosta
Cruz-AcostaLA@elpasotexas.gov
915.212.1071



MAYOR
Renard U. Johnson

CITY MANAGER
Dionne Mack

CITY COUNCIL
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District 5
Ivan Niño

District 6
Art Fierro

District 7
Lily Limón

District 8
Chris Canales

Route	Service Area	Operating Hours	Frequency
Route 4	Union Plaza Circulator	6:15 AM – 7:13 PM	60 min
Route 7	Northeast/Cielo Vista TC	4:25 AM – 7:30 PM	50 min
Route 10	Sunset Heights/UTEP	5:45 AM – 7:20 PM	50 min
Route 14	Westwind	5:35 AM – 7:40 PM	50 min
Route 15	Mesa	4:55 AM – 8:30 PM	70 min
Route 19	Resler Circulator	5:00 AM – 8:05 PM	65 min
Route 21	Chelmont Via Raynolds	5:15 AM – 6:45 PM	70 min
Route 24	Delta Via Second Ward	5:00 AM – 8:10 PM	80 min
Route 32	5 Points/Piedras/Ft Bliss	5:30 AM – 7:28 PM	45 min
Route 33	Government Hill Via Bassett	4:35 AM – 7:50 PM	80 min
Route 34	Medical Center Via Cliff	5:05 AM – 7:05 PM	90 min
Route 35	5 Points via Dyer	5:05 AM – 8:40 PM	55 min
Route 36	Beaumont Hospital/Highland	5:52 AM – 7:40 PM	110 min
Route 43	Montalvo Park Via Dyer	4:30 AM – 7:30 PM	60 min
Route 44	Sean Haggerty Via McCombs	5:20 AM – 7:17 PM	80 min
Route 46	North Hills Circulator/Rushing	5:08 AM – 7:38 PM	60 min
Route 50	Montana	5:00 AM – 8:00 PM	60 min
Route 51	RC Poe Via Edgemere	5:45 AM – 7:00 PM	100 min
Route 52	RC Poe Via Pebble Hills	6:00 AM – 6:40 PM	120 min
Route 53	Bob Mitchell via Montwood	5:30 AM – 8:38 PM	70 min
Route 58	Route 58 Montana/Turner	4:40 AM – 7:35 PM	65 min
Route 59	Eastside Connector	4:45 AM – 8:01 PM	15 min
Route 61	Route 61 DTC Via Alameda	4:10 AM – 7:23 PM	75 min
Route 62	Govt District Via Lakeside	5:52 AM – 7:58 PM	90 min
Route 63	Mission Valley via Eastside Terminal	5:28 AM – 7:28 PM	60 min
Route 65	Valle Verde via Paisano	5:10 AM – 8:07 PM	45 min
Route 66	Valle Verde via North Loop	5:00 AM – 7:16 PM	90 min
Route 67	Yarborough	5:29 AM – 8:09 PM	77 min
Route 68	Lee Trevino	5:21 AM – 7:35 PM	90 min
Route 69	George Dieter	5:10 AM – 8:45 PM	90 min
Route 72	Vista Del Sol	6:45 AM – 8:10 PM	90 min

—more—



Promoting **Transparent & Consistent Communication**
Among All Members of the Community

Media Contact: Laura Cruz Acosta
Cruz-AcostaLA@elpasotexas.gov
915.212.1071



MAYOR
Renard U. Johnson

CITY MANAGER
Dionne Mack

CITY COUNCIL

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District 2
Dr. Josh Acevedo

District 3
Deanna M. Rocha

District 4
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Route	Service Area	Operating Hours	Frequency
Route 74	Pellicano/Rojas	5:30 AM – 8:28 PM	90 min
Route 86	Bordeaux via North Loop	5:45 AM – 7:43 PM	60 min
Route 89	Zaragoza Bridge Circulator	4:40 AM – 8:00 PM	30 min
Route 205	Mesa BRIO	5:00 AM – 7:55 PM	20 min
Route 206	Alameda BRIO	5:00 AM – 7:55 PM	30 min
Route 207	Dyer BRIO	5:00 AM – 7:55 PM	30 min
Route 208	Montana BRIO	5:00 AM – 7:43 PM	30 min

Amistad Routes (Regular Weekday Schedule Continuing)

Route	Service Area	Operating Hours	Frequency
Route 5	Far East/Eastside Terminal Express	5:00 AM – 8:55 PM	80 min
Route 6	Far East/Mission Valley Express	5:30 AM – 8:33 PM	80 min
Route 8	Gateway Circulator	5:30 AM – 8:05 PM	60 min
Route 11	Mesita via Kern Place	8:00 AM – 4:55 PM	45 min
Route 12	Doniphan Circulator	5:00 AM – 8:03 PM	55 min
Route 13	Coronado Hills Circulator	5:55 AM – 7:48 PM	50 min
Route 26	Five Points/Alameda Express	6:00 AM – 6:56 PM	30 min
Route 54	RC Poe via Montwood	5:25 AM – 8:45 PM	50 min
Route 56	RC Poe/Far East Circulator	6:20 AM – 7:02 PM	45 min
Route 90	Westside/Eastside Express	5:50 AM – 7:30 PM	45 min

Modified Saturday Schedule (Effective Saturday, March 1)

Routes 14, 15, 19, 35, 43, 44, 50, 51, 52, 53, 59, 61, 62, 63, 65, 66, 68 and 89 will run on a modified schedule. *Please note: Routes 2, 25, and 60, will not operate under this schedule.*

Routes 4, 7, 10, 21, 24, 32, 33, 34, 36, 46, 58, 67, 69, 72, 74, 86, and Brios will be running on regular Saturday Schedule.

Sunday Schedule (Effective Sunday, February 23)

Regular Sunday service resumes.

Stay Updated

Passengers are encouraged to plan ahead and check for service updates via:

Sun Metro's Customer Service Center (915) 212-3333

www.SunMetro.net

Facebook & X (@SunMetroEP)

For more information, visit www.SunMetro.net or follow us on social media for real-time updates.

###



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**NEWS
RELEASE**

02/ 12/ 2025

City of El Paso Update on Fire at Sun Metro Transit Operations Center

Transit Service Adjustments to Support the Community

EL PASO, Texas—The City of El Paso and Sun Metro are responding to a fire that occurred on Tuesday at the Sun Metro Transit Operations Center (TOC), 10151 Montana Avenue.

The incident remains under investigation. The fire resulted in injuries to eight individuals—five were transported to area hospitals, while three declined medical transportation. Of those hospitalized, two are in critical condition and have been flown to a burn center in Phoenix.

“Our priority right now is ensuring the well-being of our employees and maintaining critical transit services for our community,” said City Manager Dionne Mack. “We appreciate the patience of our riders as we work to restore operations safely.”

Incident Investigation and Response

The El Paso Fire Department is continuing to investigate the cause of the fire. Sun Metro is working closely with emergency responders and city officials to assess the damage and determine next steps for restoring full operations.

“We understand that the public and the media have many questions, and we are committed to providing answers. However, at this time, we ask for patience as we focus on supporting our staff and stabilizing operations,” said Sun Metro Director Anthony Dekeyzer.

Support for Employees

The City is providing support to affected employees, including access to medical care, counseling, and assistance with accommodations as needed.

Press Briefing Scheduled for Tomorrow

Sun Metro will host a press briefing at 1 p.m. Thursday, February 13, 2025, at the Transit Operations Center, 10151 Montana to provide additional updates.

Please note: At this time, our focus remains on assisting staff and maintaining transit operations.

Transit Service Adjustments

Sun Metro recognizes that for many in our community, public transit is their primary or only means of transportation.

In response to the incident, we have been evaluating operations to determine how to best serve riders while managing available resources.

At this time, most fixed routes will operate on a Sunday/Holiday schedule to maintain essential transit services.

However, to better support the community, we are making the following modifications to key routes to ensure students and commuters can reach schools and workplaces:

—more—



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Among All Members of the Community

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Modified Sunday Schedule for Key Routes:

- Route 205 (Mesa BRIO) – Service begins at 6 AM with a 20-minute frequency.
- Route 206 (Alameda BRIO) – Service begins at 6 AM with a 25-minute frequency.
- Route 207 (Dyer BRIO) – Service begins at 6 AM with a 25-minute frequency.
- Route 208 (Montana BRIO) – Service begins at 6 AM with a 30-minute frequency.
- Route 59 (Eastside Connector) – First bus departs 6:04 AM from DTC, with a 28-minute frequency.

Additionally, routes serviced by our community partner, Amistad, will continue to operate on their regular schedules. These routes include:

- Rt. 5 – Far East/Eastside Transfer Center Express
- Rt. 6 – Far East/Mission Valley Transfer Center Express
- Rt. 8 – Gateway Circulator
- Rt. 11 – Mesita via Kern Place
- Rt. 12 – Doniphan Circulator
- Rt. 13 – Coronado Hills Circulator
- Rt. 26 – 5 Points/Alameda Express
- Rt. 54 – RC Poe via Montwood
- Rt. 56 – RC Poe/Far East Circulator
- Rt. 90 – Park-N-Ride Westside to Eastside Express

Riders are encouraged to plan ahead and check for service updates via Sun Metro's website sunmetro.net and social media platforms.

In response to the recent events, Sun Metro has been evaluating operations to determine how to best serve riders while managing available resources.

For the latest updates, please visit www.SunMetro.net or follow us on [Facebook](https://www.facebook.com/sunmetro) or [X](https://twitter.com/sunmetro).

###



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Among All Members of the Community

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Cruz-AcostaLA@elpasotexas.gov
915.212.1071

Appendix D: Mass Transit Department Board Meeting Minutes

January 6, 2026

PENDING

Appendix E: Sun Metro Certifications & Assurances

Certifications & Assurances | FY 2025 C&A Affirmations

Certification and Assurance Information

Fiscal Year 2025
Assigned Date 5/23/2025
Due Date 8/21/2025

Original Certification Date 6/10/2025
Latest Certification Date 6/10/2025

Published Certifications and Assurances

FTA CERTIFICATIONS AND ASSURANCES

Public Transportation Agency Safety Plan (PTASP)

Applicants and recipients of Section 5307 grants and rail transit agencies that are subject to the State Safety Oversight Program must certify to Category 2: Public Transportation Agency Safety Plans (PTASP). The deadline for certification was July 20, 2020, however, in light of the extraordinary challenges presented by the COVID-19 public health emergency, FTA issued a Notice of Enforcement Discretion for the PTASP regulation (49 CFR Part 673). FTA will refrain from taking enforcement action until July 21, 2021 for applicants and recipients unable to certify compliance with the PTASP regulation before July 20, 2021. While applicants and recipients are encouraged to certify compliance as soon as reasonably practicable under the current circumstances caused by the COVID-19 public health emergency, those who do not certify compliance until July 20, 2021 remain eligible for Chapter 53 grant funds.

[List of All Applicable Agencies](#)[PTASP Technical Assistance Center](#)

Certifications and Assurances

Certification History

Certification Date: 6/10/2025 | Official: Anthony Dekeyzer | Attorney: Joyce Garcia

Category	Title	Cer
01	Certifications and Assurances Required of Every Applicant	
02	Public Transportation Agency Safety Plans	
03	Tax Liability and Felony Convictions	
04	Private Sector Protections	
05	Transit Asset Management Plan	
06	Rolling Stock Buy America Reviews and Bus Testing	
07	Urbanized Area Formula Grants Program	
08	Formula Grants for Rural Areas	
09	Fixed Guideway Capital Investment Grants and the Expedited Project Delivery for Capital Investment Grants Pilot Program	
10	Grants for Buses and Bus Facilities and Low or No Emission Vehicle Deployment Grant Programs	

11	Enhanced Mobility of Seniors and Individuals with Disabilities Programs	
Category	Title	Cer
12	State of Good Repair Grants	
13	Infrastructure Finance Programs	
14	Alcohol and Controlled Substances Testing	
15	Rail Safety Training and Oversight	
16	Demand Responsive Service	
17	Interest and Financing Costs	
18	Cybersecurity Certification for Rail Rolling Stock and Operations	
19	Tribal Transit Programs	
20	Emergency Relief Program	
1 – 20 of 20		

Documents

Existing Documents

Document	Description	Uploaded By	Date
No items available			

Affirmation of Applicant

Affirmation of Applicant BY SIGNING BELOW, on behalf of the Applicant, I declare that it has duly authorized me to make these Certifications and Assurances and bind its compliance. Thus, it agrees to comply with all federal laws, regulations, and requirements, follow applicable federal guidance, and comply with the Certifications and Assurances as indicated on the foregoing page applicable to each application its Authorized Representative makes to the Federal Transit Administration (FTA) in the federal fiscal year, irrespective of whether the individual that acted on his or her Applicant's behalf continues to represent it.

The Certifications and Assurances the Applicant selects apply to each Award for which it now seeks, or may later seek federal assistance to be awarded by FTA during the federal fiscal year.

The Applicant affirms the truthfulness and accuracy of the Certifications and Assurances it has selected in the statements submitted with this document and any other submission made to FTA, and acknowledges that the Program Fraud Civil Remedies Act of 1986, 31 U.S.C. § 3801 et seq., and implementing U.S. DOT regulations, "Program Fraud Civil Remedies," 49 CFR part 31, apply to any certification, assurance or submission made to FTA. The criminal provisions of 18 U.S.C. § 1001 apply to any certification, assurance, or submission made in connection with a federal public transportation program authorized by 49 U.S.C. chapter 53 or any other statute.

In signing this document, I declare under penalties of perjury that the foregoing Certifications and Assurances, and any other statements made by me on behalf of the Applicant are true and accurate.

Official's Name Anthony Dekeyzer

☒ I accept the above

Certification Date May 30, 2025

Affirmation of Attorney

Affirmation of Applicant's Attorney As the undersigned Attorney for the above-named Applicant, I hereby affirm to the Applicant that it has authority under state, local, or tribal government law, as applicable, to make and comply with the Certifications and Assurances as indicated on the foregoing pages. I further affirm that, in my opinion, the Certifications and Assurances have been legally made and constitute legal and binding obligations on it.

I further affirm that, to the best of my knowledge, there is no legislation or litigation pending or imminent that might adversely affect the validity of these Certifications and Assurances, or of the performance of its FTA assisted Award.

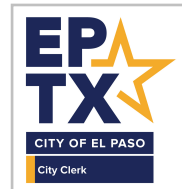
Attorney's Name Joyce Garcia

☒ I accept the above

Certification Date Jun 10, 2025

CANCEL

**CITY OF EL PASO, TEXAS
AGENDA ITEM
DEPARTMENT HEAD'S SUMMARY FORM**



DEPARTMENT: Sun Metro Mass Transit

AGENDA DATE: 1/6/26

PUBLIC HEARING DATE:

CONTACT PERSON NAME: Anthony DeKeyzer

PHONE NUMBER: (915) 212-3306

2nd CONTACT PERSON NAME: Dwayne Arnold

PHONE NUMBER: (915) 212-3306

DISTRICT(S) AFFECTED: All

STRATEGIC GOAL:

7. Enhance & Sustain El Paso's Infrastructure Network

SUBGOAL:

7.3: Enhance a regional comprehensive transportation system

SUBJECT:

Consent and Notation that the Sun Metro Agency Safety Plan is approved and adopted. Further, that the City Manager, or designee, be authorized to submit the Agency Safety Plan to the Federal Transit Administration, the Texas Department of Transportation, and/or the State Safety Oversight Agency. Further, that the City Manager or designee, be authorized to execute any documents and perform any actions necessary to effectuate the Agency Safety Plan. Further, to the extent allowed by law that the City Manager is authorized to make any changes to the Agency Safety Plan.

The Sun Metro Agency Safety Plan includes the following outline:

Plan Approval Documentation; PTASP Revision History Table; Safety Management Policy Chapter (CFR 673.23); Control of Records & Documents requirements; Sun Metro Organizational Chart; Safety Risk Management (49 CFR 673.25); Safety Assurance (49 CFR 673.27); Safety Promotion Chapter (49 CFR 673.29); Emergency Preparedness and Response Plan; Road Workers Protection (RWP) (49 CFR 673.25 and 671)

BACKGROUND / DISCUSSION:

The Safety Plan is reviewed annually and more often as needed

COMMUNITY AND STAKEHOLDER OUTREACH:

N/A

PRIOR COUNCIL ACTION:

Revision 5 of the Sun Metro Agency Safety Plan was approved by Mass Transit Department Board on February 4, 2025.

AMOUNT AND SOURCE OF FUNDING:

N/A

REPORTING OF CONTRIBUTION OR DONATION TO CITY COUNCIL:

N/A

NAME	AMOUNT (\$)

*****REQUIRED AUTHORIZATION*****

DEPARTMENT HEAD:

Jerry DeMuro

Digitally signed by Jerry DeMuro
Date: 2025.12.05 09:53:39 -07'00'

(If Department Head Summary Form is initiated by Purchasing, client department should sign also)

RESOLUTION

WHEREAS, in compliance with federal law, specifically 49 U.S.C. §5329, the City of El Paso's Mass Transit Department ("Sun Metro") maintains a public transportation agency safety plan, called Sun Metro Agency Safety Plan ("plan"); and

WHEREAS, the City of El Paso updates the plan periodically in order to maintain compliance with the law and ensure the safety of the employees, the riders and the community at large; and

WHEREAS, the last update to the plan was approved by the City of El Paso's Mass Transit Department Board on February 4, 2025; and

WHEREAS, City of El Paso now wishes to update the plan to improve the services provided to the community and ensure the safety of its employees and the public it serves.

NOW THEREFORE, BE IT RESOLVED BY THE MASS TRANSIT DEPARTMENT BOARD OF THE CITY OF EL PASO:

That the Sun Metro Agency Safety Plan attached to this resolution as Attachment "A" is approved and adopted.

That the City Manager, or designee, be authorized to submit the Sun Metro Agency Safety Plan to the Federal Transit Administration, the Texas Department of Transportation, the State Safety Oversight Agency and any other entities required by law.

That the City Manager, or designee, be authorized to execute any documents and perform any actions necessary to effectuate the Sun Metro Agency Safety Plan.

APPROVED this ____ day of _____, 2026.

MASS TRANSIT DEPARTMENT BOARD:

Renard U. Johnson
Chair

ATTEST:

Laura D. Prine, Secretary

APPROVED AS TO FORM:

Joyce Garcia

Joyce Garcia
Assistant City Attorney

APPROVED AS TO CONTENT:

Jerry DeMuro Deputy Transit Officer for
Anthony R. Dekeyzer, Director
Sun Metro/Mass Transit Department

(Attachment "A" on the following pages)

Sun Metro Agency Safety Plan

Revision 6
November 10, 2025

Sun Metro | City of El Paso
10151 Montana Ave.
El Paso, TX 79925

Approved on: _____



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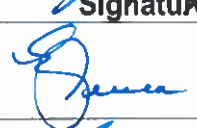
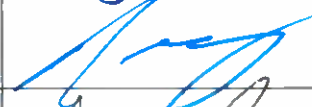
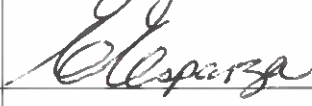
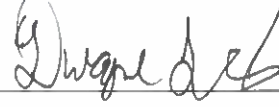
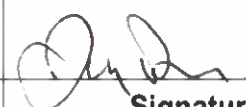
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Plan Approval Documentation

Prepared By	Signature	Date
Johnny Balcazar, WSO-CSSD, TSSP, PTSCTP, Bus/Rail Streetcar Safety Manager/SMS Executive		12/18/2025
Reviewed By	Signature	Date
Esteban Perea, TSSP-Bus, WSO-CSM Transit Safety Manager, Sun Metro		12/18/2025
Jose Alvarez Sun Metro LIFT Safety & Operations Manager		12/18/2025
Felix Minjarez Jr., TSSP, PTSCTP – Bus/Rail Transit Superintendent of Operations, Streetcar		12/18/25
Robert Dominguez Transit Superintendent of Operations, Sun Metro		12.18.25
Everett Esparza, TSSP-Rail Chief Streetcar Officer		12/19/2025
Danny Meza Fleet Maintenance Manager		12/18/2025
Nick Ferriola, TSSP, PTSCTP - Bus/Rail Transit Safety & Security Officer		12/18/2025
Dwayne T. Arnold, TSSP, PTSCTP, Bus/Rail Assistant Director of Transit Operations		12/18/2025
Jerry DeMuro, Deputy Transit Officer		12/18/2025
Approved By	Signature	Date
Anthony R. DeKeyzer Director of Mass Transit – Sun Metro (Accountable Executive)		12/18/25

Name of Entity	El Paso Streetcar - Sun Metro	
Approval by Joint Labor-Management Committee (Streetcar Safety Committee)	Name of Individual/Entity That Approved This Plan	Date of Approval
	Labor-Management Safety Committee	12/18/2025
	Relevant Documentation (title and location)	
	Public Transportation Agency Safety Plan (PTASP)	
Name of Entity	Mass Transit Department - Sun Metro	
Approval by the Board of Directors or an Equivalent Authority	Name of Individual/Entity That Approved This Plan	Date of Approval
	Mass Transit Board	
	Relevant Documentation (title and location)	
	Approval resolution	

PTASP Revision History Table

Date	Revision	Description of Change	Section or Page
April 2020	0	Original Document	
April 2021	1	Update headers and footers -	
		Terms and Definitions - 1. Safety Event 2. Drill 3. Designated personnel 4. Key Staff	
		Name of AE -	3.2
		Update Signature table Add Fixed Route Operations & Maintenance personnel and safety committee approval box with approval date.	Page 5
		Revision History Table	Page 6

Date	Revision	Description of Change	Section or Page
		Performance Measures - Use Frequency Rates instead of the number of events	3.3.5
		Add Fixed Route positions to Key Staff	3.4
		Update Sun Metro / EPSC Organizational Chart	3.4
		Revise section 5.3 regarding an investigation	5.3
		Internal Safety Audit update section Added 2021 Audit Schedule	5.4.1
		Update Section 5.6 Management of Change and the Program	5.6
		Review Training and Certification Plan	6.1.1
		Update the Hazardous Material program to include the fixed route	6.1.3
		Update the Drug & Alcohol Recordkeeping section	6.1.5
		Updated safety bulletin board photo	page 59
Nov 2021	2	Update the LIFT paratransit section, review definitions for FTA compliance, remove OSHA reference for Sun Metro, further define safety meetings, update the organizational chart, update the D&A section to include safety-sensitive positions, update safety performance measures, and reference the SMS Executive as an equivalent to the Chief Safety Officer.	
Sep 2022	3	Update headers and footers -	
		Update Signature table	Page 5
		Revision History Table	Page 6-8
		Added Acronyms	Pages 12-14

Date	Revision	Description of Change	Section or Page
		Added new Upper East Side Transfer Center	Page 16
		Performance Measures – removed projected	Pages 22-23
		Update Sun Metro / EPSC Organizational Chart	Pages 26-27
		Updated and added the SMS Executive Job Duties to the Streetcar Safety Manager	Page 28
		Updated Titles and added New Fixed Route positions to Key Staff	Pages 33-40
		Updated safety bulletin and added QR Code for Hazard reporting	Page 46
		I added New Bipartisan Infrastructure Law requirements: Risk Reduction Program, Exposure to Infectious Disease, Assault Awareness, and Prevention for Transit Operators.	Pages 67-69
Sep 2023	4	Updated signature Table	Page 5
		Revision History Table	Pages 8-9
		Corrected Acronyms	Page 14-17
		The organization's information was updated.	Pages 18-20
		Sec 2.1 Control and Updates Procedures was updated to coincide with Sec 4.4 of the TxDOT Program Standard, August 2023	Page 20-21
		Updated the Control Documentation notes	Page 23
		Updated the Performance Measures	Pages 27-28
		Updated title for the Managing Director in sec 3.4.1	Page 29

Date	Revision	Description of Change	Section or Page
		Updated the Sun Metro and Safety Organizations Charts	Page 30-31
		Sec 3.4.9 Sun Metro Transit Assistant Superintendent of Operations was updated.	Page 41-42
		Sec 3.4.10 Transit Safety & Security Officer was updated	Page 43
		Drug & Alcohol information for the Sun Metro Lift SMS Program was updated with 49 CRF 655 Federal Regulation.	Page 45
		Sec 3.6 Safety Management Policy Communication was updated with more detailed methods of SMP communication.	Page 51
		Sec 4.3.2 Hazard Severity was updated on the frequency of updating OHA's and or PHA's	Page 55
		Sec 5.5.1.4 Cycle/Schedule, sec 5.5.1.5 Checklist and Performance of Safety Audits – updated language to match current practice	Page 67
		Sec 5.5.1.6 Audit Report was updated to coincide with sec 4.7 of the TxDOT Program Standard, August 2023	Page 68
		Sec 5.5.3.3 Assault Awareness and Prevention for Transit Operators was updated to encompass Transit Employees.	Page 71-72
		Sec 5.6 Corrective Actions was updated to indicate the SSO tracker vs the name of the software and to address how the RTA will manage the immediate or emergency Corrective Action.	Page 72-73
		Sec 7.4 Emergency Drills and Exercises was updated	Page 86-87

Date	Revision	Description of Change	Section or Page
March 2024	5	Sec. 8 Risk-based Inspections was added to the document	Page 98-99
October 2024	5	Update Signature table	Page 6
		Revision History Table	Pag 10,11
		Updated Definitions	Page 12-18
		Updated the Introduction and removed Route 84 from the Sun Metro Service, and added information on the Brio information board status	Page 22 - 24
		Sec 2.1 Updated Control and update procedures	Pages 25-27
		Sec. 3.1 Safety Management	Page 28
		Sec 3.3 Safety Performance Measure	Pages 30-38
		Sec 3.4.1 Updated Sun Metro Director responsibilities	Page 39
		Sec 3. Safety Management Policy, added the Safety set-aside eligible under 49 U.S.C. 5307 for safety performance targets	Page 40
		Updated Sun Metro/Safety Department Organizational Charts	Pages 40-41
		Sec 4.2 Safety Hazard	Page 63
		Sec 4.5 Added the Roadway Workers Protection	Pages 69-70
		Added Sec 5.3.5 Allegations of non-compliance	Page 76
		Sec 5.4 Audit Report was updated to coincide with sec 4.7 of the TxDOT Program Standard, August 2024	Page 76 - 82
		Sec 5.5 Updated Corrective Action	Pages 82-84

Date	Revision	Description of Change	Section or Page
		Sec 5.3.3.1 Added Risk Reduction Tables	Pages 82-83
		Sec 5.6 Updated Management of Change	Pages 84-86
		Sec 6.2.1 Added the New requirements for the Labor-Management Safety Committee (LMSC)	Pages 93- 100
November 2025		Footer and Headers	All Pages
		Signature Page Updated names and Titles	Page 6
		Definitions and Acronyms to reflect RWP	Page 13-22
		2.1 Control and Update Procedure Updated sec to reflect RWP Requirements	Page 26
		3.0 Safety Management Policy Updated sec to reflect RWP Requirements	Page 30
		4 Safety Risk Management Updated sec to reflect RWP Requirements	Pages 66-74
		4.5 Roadway Worker Protection Updated sec to reflect RWP Requirements	Page 75
		5 Safety Assurance Updated sec to reflect RWP Requirements	Page 76
		6.0 Safety Promotion Updated sec to reflect RWP Requirements	Page 98
		8 Risk-Based Inspections Updated sec to reflect RWP Requirements	Pages 117-119

DEFINITIONS

1. **Accident:** 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.
2. **Accountable Executive:** means a single, identifiable person who has ultimate responsibility for carrying out the Public Transportation Agency Safety Plan of a Transit agency; responsibility for carrying out the Transit agency's Transit Asset Management Plan; and control or direction over the human and capital resources needed to develop and maintain both the transit agency's Public Transportation Agency Safety Plan, in accordance with 49 U.S.C. 5329(d), and the transit agency's Transit Asset Management Plan in accordance with 49 U.S.C. 5326.
3. **Assault on a transit worker:** means, as defined under 49 U.S.C. 5302, a circumstance in which an individual knowingly, without lawful authority or permission, and with intent to endanger the safety of any individual, or with a reckless disregard for the safety of human life, interferes with, disables, or incapacitates a transit worker while the transit worker is performing the duties of the transit worker.
4. **Audit:** A review or analysis of records and related materials, including, but not limited to, those related to financial accounts.
5. **CDC** means the Centers for Disease Control and Prevention of the United States Department of Health and Human Services.
6. **Chief Safety Officer:** means an adequately trained individual responsible for safety and reports directly to a transit agency's Director, general manager, president, or equivalent officer. A Chief Safety Officer may not serve in other operational or maintenance capacities unless employed by a transit agency that is a small public transportation provider as defined in 49 CFR 673.5 or a public transportation provider that does not operate a rail fixed guideway public transportation system.
7. **CFR: The Code of Federal Regulations**, which is a compilation of all the rules and regulations issued by federal agencies, including the FTA.
8. **Consultation:** the process of seeking, discussing, and considering the views of other participants, and, where feasible, seeking agreement with them regarding matters.
9. **Contractor:** An entity that performs tasks on behalf of FTA, a State Safety Oversight Agency, or a Rail Transit Agency, through a contract or other agreement
10. **Corrective Action Plan (CAP):** A plan developed by a Rail Transit Agency that describes the actions the Rail Transit Agency will take to minimize, control, correct, or eliminate risks and hazards, and the schedule for taking those actions. Either a State Safety Oversight Agency or FTA may require a Rail Transit Agency to develop and carry out a Corrective Action Plan.
11. **Day:** A calendar day, which means a 24-hour period beginning at 12:00 a.m. and ending at 11:59 p.m. local time.
12. **Designated personnel** means:
 - (1) Employees and contractors identified by a recipient whose job function is directly responsible for safety oversight of the public transportation system of the public transportation agency; or

- (2) Employees and contractors of a State Safety Oversight Agency whose job function requires them to conduct safety audits and examinations of the rail fixed guideway public transportation systems subject to the jurisdiction of the agency.
13. **Direct recipient** means an entity that receives Federal financial assistance directly from the Federal Transit Administration.
14. **Directly responsible for safety oversight** means public transportation agency personnel whose primary job function includes developing, implementing, and reviewing the agency's safety plan, and/or the SSOA requirements for the rail fixed guideway public transportation system under 49 CFR parts 659 or 674.
15. **Drill**: A supervised activity to test a procedure that is a component of the overall PTASP, Emergency Management Plan, or any other Sun Metro Document. A drill may be a step leading towards an exercise, or it can also be an actual field response. The true value of a drill lies in its ability to highlight a limited portion of the overall Emergency Management Plan and to examine it closely. (APTA SS-SEM-S-004-09 Rev. 1| General Guidance on Transit Drills and Exercises)
16. **Emergency** means, as defined under 49 U.S.C. 5324, a natural disaster affecting a wide area (such as a flood, hurricane, tidal wave, earthquake, severe storm, or landslide) or a catastrophic failure from any external cause, as a result of which the Governor of a State has declared an emergency and the Secretary has concurred; or the President has declared a major disaster under section 401 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. 5170).
17. **An equivalent entity** means an entity that carries out duties similar to those of a Board of Directors, for a recipient or sub-recipient of FTA funds under 49 U.S.C. Chapter 53, including the sufficient authority to review and approve a recipient or sub-recipient Public Transportation Agency Safety Plan.
18. **Examination** means a process for gathering or analyzing facts or information related to the safety of a public transportation system.
19. **FRA**: The Federal Railroad Administration is an agency within the United States Department of Transportation
20. **FTA** means the Federal Transit Administration, an operating administration within the United States Department of Transportation.
21. **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.
22. **Hazard Analysis**: The method by which hazards are identified and analyzed as to their possible effects on the safe operation of the entire system (i.e., Failure Mode and Effect Analysis, Fault Tree Analysis, Stress Analysis, etc.)
23. **Hazard Identification**: formal activities to analyze potential consequences of hazards during operations related to the provisions of service
24. **Hazardous Condition**: An immediate condition that could cause a safety event involving personal injuries or death
25. **Immediate Safety Concern**: A condition or situation that poses an urgent risk to the safety of employees, passengers, or the public, and requires immediate action to mitigate or eliminate the threat to prevent injury, fatality, or significant property damage.
26. **Injury**: Any physical damage or harm to persons as a result of a safety event that requires immediate medical attention away from the scene

27. **Inspection:** a physical observation of equipment, operations, or records for the purpose of gathering or analyzing facts or information.
28. **Investigation** means the process of determining the causal and contributing factors of a safety event, or hazard, to prevent recurrence and mitigate risk.
29. **Joint Labor-management:** A cooperative arrangement between representatives of labor (employees, often through a union) and management (employers or organizational leadership) that aims to address workplace issues, resolve conflicts, and improve organizational outcomes through collaboration and shared decision-making.
30. **Key Staff:** Sun Metro managing positions responsible for the implementation of Sun Metro's Agency Safety Plan.
31. **Large, urbanized area:** An urbanized area with a population of 200,000 or more, as designated by the U.S. Census Bureau.
32. **Maintenance Data:** Data that includes, but is not limited to, major maintenance activity schedule and progress, adherence to maintenance schedules, including reports/documentation of deferred maintenance records of failures and defects with severity if applicable, and records of revenue vehicles out of service, including casual information.
33. **Mode Safety Manager:** Safety Manager assigned to a specific transportation mode in Sun Metro
34. **National Public Transportation Safety Plan** means the plan to improve the safety of all public transportation systems that receive Federal financial assistance under 49 U.S.C. Chapter 53.
35. **Near Miss:** An unplanned event that had the potential to result in injury, illness, damage to property, or environmental harm but did not actually cause any of these outcomes, either due to intervention or by chance.
36. **NTSB:** National Transportation Safety Board, an independent federal agency
37. **NTD: National Transit Database (NTD)** is a comprehensive database maintained by the FTA that collects and reports on public transportation statistics in the U.S. It includes data on ridership, financials, operations, and safety performance across various transit agencies. The NTD is used to assess the performance of transit systems, allocate federal funds, and inform policy decisions.
38. **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.
39. **Operator of a public transportation system** means a provider of public transportation as defined under 49 U.S.C. 5302(14). *Public transportation agency* means an entity that provides public transportation service as defined in 49 U.S.C. 5302, and that has one or more modes of service not subject to the safety oversight requirements of another Federal agency.
40. **Performance measure** means an expression based on a quantifiable indicator of performance or condition that is used to establish and assess progress toward meeting the established targets.
41. **Performance target** means a quantifiable level of performance or condition, expressed as a value for the measure, to be achieved within a period required by the Federal Transit Administration (FTA).
42. **Person:** A passenger, employee, contractor, pedestrian, trespasser, or any individual on the property of a rail's fixed guideway public transportation system

43. **Potential Consequence:** The anticipated outcome or impact of a hazard that could negatively affect an organization's safety objectives, such as causing injuries, fatalities, damage to property, or disruptions to service.
44. **Public Transportation:** Regular, continuing, shared-ride surface transportation services that are open to the general public or a segment of the general public and are provided by various modes, such as buses, subways, light rail, commuter rail, trolleys, and ferries.
45. **Public Transportation Agency Safety Plan (PTASP)** means the documented comprehensive agency safety plan for a transit agency that is required by 49 U.S.C. 5329 and this part.
46. **Public Transportation Safety Certification Training Program:** The certification training program for federal and state employees or other designated personnel who conduct safety audits and examinations of public transportation systems. Employees of public transportation agencies directly responsible for safety oversight are also required to complete the PTSCTP.
47. **Publicly Accessible Areas:** Means stations, platforms, vehicles in revenue service, roadway, sidewalk, park, walkway, or other areas open to the general public.
48. **Rail fixed guideway public transportation system** means any fixed guideway system that uses rail, is operated for public transportation, is within the jurisdiction of a State, and is not subject to the jurisdiction of the Federal Railroad Administration, or any such system in engineering or construction. Rail fixed guideway public transportation systems include, but are not limited to, rapid rail, heavy rail, light rail, monorail, trolley, inclined plane, funicular, and automated guideway.
49. **Rail Transit Agency** means any entity that provides services on a rail fixed guideway public transportation system.
50. **Recipient** means a State or local governmental authority or any other operator of a public transportation system receiving financial assistance under 49 U.S.C. Chapter 53.
51. **NTD Reportable Event:** Existence of one or more of the following:
 - (1) A fatality confirmed within 30 days (including suicide)
 - (2) An injury requiring immediate medical attention away from the scene for one or more persons (partial exception in the case of Other Safety Occurrences Not Otherwise Classified)
 - (3) Estimated property damage equal to or exceeding \$25,000
 - (4) An evacuation due to or under hazardous conditions or to the rail Right-Of-Way
 - (5) Collisions involving transit vehicles that require towing away of a transit roadway vehicle or other non-transit roadway vehicles
 - (6) Rail transit vehicle collisions occurring at a grade crossing
 - (7) Rail transit vehicle collisions with an individual on the rail right-of-way or another revenue or non-revenue rail transit vehicle
 - (8) A mainline or yard derailment of revenue or non-revenue vehicles
 - (9) Security Events
 - (10) Terrorism-related events
 - (11) Bomb threat (Credible)
 - (12) Bombing (Occurring)
 - (13) Chemical / Biological / Radiological / Nuclear release
 - Other system security events:
 - Arson

- Sabotage
- Hijacking
- Cyber-Attack
- Other personal events:
 - Aggravated assault
 - Rape
 - Suicide
 - Attempted suicide (Survived attempt)
 - Vandalism (See dollar limits)
 - Robbery (See dollar limits)
 - Burglary (See dollar limits)
 - Motor vehicle theft (Proven by Police)
 - Larceny/theft (See dollar limits)
 - Homicide

52. **Risk** means the composite of predicted severity and likelihood of the potential effect of a hazard.
53. **Risk-based Inspection:** An inspection conducted as part of a risk-based inspection program.
54. **Risk-based Inspection Data Management System:** A physical or digital system that follows administrative policies and procedures that identify data storage, organization, and management processes for risk-based inspections.
55. **Risk-based Inspection Program** A risk-based inspection program uses qualitative and quantitative data analysis to inform ongoing inspection activities. Risk-based inspection programs are designed to prioritize inspections to address safety concerns and hazards associated with the highest levels of safety risk.
56. **Risk Mitigation** means a method or method to eliminate or reduce the effects of hazards.
57. **Roadway:** That portion of a highway, including shoulders, designed for vehicular travel.
58. **Sabotage:** The deliberate destruction of transit property or the slowing down of public transit operations by employees with the intention of damaging business or the economic condition of the transit agency
59. **Safety Assurance** means processes within a transit agency's Safety Management System that function 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.
60. **Safety Audit** means a review or analysis of safety records *and related* materials, including, but not limited to, those related to financial accounts.
61. **Safety Committee:** the formal joint labor-management committee on issues related to safety that is required by 49 U.S.C. 5329 and this part.
62. **Safety Event:** an unexpected outcome resulting in injury or death; damage to or loss of the facilities, equipment, rolling stock, or infrastructure of a public transportation system; or damage to the environment. Accidents as defined by FTA, Incidents as defined by FTA, Occurrences as defined by FTA, including near-misses, red signal overrun, improper door operation, wrong route, and unexpected service shut down for a safety reason.

63. **Safety Management Policy** means a transit agency's documented commitment to safety, which defines the transit agency's safety objectives and the accountabilities and responsibilities of its employees regarding safety.
64. **Safety Management System (SMS)** means 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.
65. **Safety Management System (SMS) Executive** means a Chief Safety Officer or an equivalent. The Safety Management System Executive fulfills the duties of the Chief Safety Officer in accordance with the TxDOT Program Standard and 49 CFR 673. The SMS Executive has the authority and responsibilities of the day-to-day implementation and operation of the agency's SMS and may serve in roles that have a nexus to safety, such as security, asset management, and training (C.F.R. Part 673.5)
66. **Safety Performance Target** means a Performance Target related to safety management activities.
67. **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.
68. **Safety Program Data:** means data that includes, but is not limited to, event data, hazard data, safety risk ratings, mitigation data, CAP data, near-miss data, and ongoing monitoring data.
69. **Safety Risk:** means the composite of predicted severity and likelihood of a potential consequence of a hazard.
70. **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.
71. **Safety Risk Mitigation:** means a method or methods to eliminate or reduce the severity and/or likelihood of a potential consequence of a hazard.
72. **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 risks.
73. **Safety Set-aside:** means the allocation of not less than 0.75 percent of assistance received by a large urbanized area provider under 49 U.S.C. 5307 to safety-related projects eligible under 49 U.S.C. 5307.
74. **Serious Injury** means any injury which:
 - (1) Requires hospitalization for more than 48 hours, commencing within 7 days from the date 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; orInvolves second or third-degree burns or any burns affecting more than 5 percent of the body surface.
75. **Small public transportation provider** means a recipient or sub-recipient 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.

- 76. **SSOC:** Safety & Security Operations Committee
- 77. **SSP:** System Security Plan.
- 78. **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.
- 79. **State of Good Repair** means the condition in which a capital asset can operate at a full level of performance.
- 80. **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 outlined in 49 CFR part 674.
- 81. **Transit Agency** means an operator of a public transportation system.
- 82. **Transit Asset Management Plan** means the 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, to provide safe, cost-effective, and reliable public transportation, as required by 49 U.S.C. 5326 and 49 CFR part 625.
- 83. **Transit Worker:** means any employee, contractor, or volunteer working on behalf of the transit agency.
- 84. **TTP:**
- 85. **Subsystem:** An element of a system that, in itself, may constitute a system
- 86. **Urbanized Area:** means, as defined under 49 U.S.C. 5302, an area encompassing a population of 50,000 or more that has been defined and designated in the most recent decennial census as an urban area by the Secretary of Commerce.
- 87. **Vehicle:** Any rolling stock used on a rail's fixed guideway public transportation system, including, but not limited to, passenger and maintenance vehicles.

Acronyms

AAR	After-Action Reports
ADA	Americans with Disabilities Act
AE	Accountable Executive
ANSI	American National Standards Institute
APTA	American Public Transit Association
AVL	Automatic Vehicle Locator
BRT	Bus Rapid Transit
CAP	Corrective Action Plan(s)
CCR	Configuration Change Request
CDC	Centers for Disease Control
CFR	Code of Federal Regulations
COOP	Continuity of Operations Plan
CSO	Chief Safety Officer
CSO	Chief Streetcar Officer
DHS	Department of Homeland Security
DOD	United States Department of Defense
EMA	Emergency Management Agency
EMP	Emergency Management Plan
ERP	Emergency Response Plan
EPSC	El Paso Streetcar
ESRP	Employee Safety Reporting Program
EX	Emergency Exercise
FLSC	Fire Life Safety Committee
FSE	Full-Scale Exercise
FTA	Federal Transit Administration
GPS	Global Positioning Satellite
HSEEP	Homeland Security Exercise and Evaluation Program
ICS	Incident Command System
ID	Identification
ISA	Internal Safety Audit
ITP	Individual Training Program
KPI	Key Performance Indicators
MAP-21	Moving Ahead for Progress in the 21 st Century
MIL-STD	Military Standard
MPO	Metropolitan Planning Organization
MSDS	Material Safety Data Sheets
MSF	Maintenance and Storage Facility
MTI	Manager of Streetcar Infrastructure
N/A	Not Applicable
NFPA	National Fire Protection Association
NIOSH	National Institute for Occupational Safety and Health
NPTSP	National Public Transportation Safety Plan
NSC	National Safety Council
NSP	National Safety Plan, <i>also see NPTSP</i>
NTD	National Transit Database

NTI	National Transportation Institute
NTSB	National Transportation Safety Board
O&M	Operation and Maintenance
OCS	Overhead Contact Systems
OEM	Original Equipment Manufacturer
OMP	Operations and Maintenance Plan
OSHA	Occupational Safety and Health Administration
PHA	Preliminary Hazard Analysis
PM	Preventive Maintenance
PMI	Preventive Maintenance Inspection
PMMS	Preventive Maintenance Management System
PPE	Personal Protective Equipment
PRO	Pre-Revenue Operations
PTASP	Public Transportation Agency Safety Plan
PTSCTP	Public Transportation Safety Certification Training Program
QA	Quality Assurance
QC	Quality Control
RFGPTS	Rail Fixed Guideway Public Transportation System
ROW	Right-Of-Way
RTA	Rail Transit Agency
RWP	Roadway Worker Protection
SA	Safety Assurance
SDS	Safety Data Sheet, <i>also see MSDS</i>
SGR	State of Good Repair
SIT	System integration testing
SME	Subject Matter Expert
SMS	Safety Management System
SMP	Standard Maintenance Procedures
SOP	Standard Operating Procedures
SPC	Safety Performance Criteria
SPI	Safety Performance Indicators
SPT	Safety Performance Targets
SRA	Safety Risk Analysis
SRCP	Safety Rules Compliance Program
SRL	Safety Risk Log
SRM	Safety Risk Management
SSC	Safety and Security Certification
SSCP	Safety and Security Certification Plan(s)
SSEPP	System Security and Emergency Preparedness Plan
SSO	State Safety Oversight
SSOA	State Safety Oversight Agency
SSPP	System Safety Program Plan
SSPS	State Safety Oversight Program Standard
SSRC	Safety and Security Review Committee
SSWG	Safety and Security Working Group
TAM	Transit Asset Management Plan
TxDOT	Texas Department of Transportation

TPSS	Traction Power Sub Station
TSA	Transportation Security Administration
TSSO	Transit Safety & Security Officer
TTP	Technical Training Plan
TTX	Tabletop Exercise
TVA	Threat and Vulnerability Analysis
U.S.C.	United States Code
UC	Unified Command
VRM	Vehicle Revenue Miles
WSO	World Safety Organization

1. Introduction

1.1. Organization

To meet the population growth, the city of El Paso, a large Urbanized area, Sun Metro offers fixed routes and paratransit - Living Independently Facilitated by Transit (LIFT) services. Sun Metro is one of the largest city departments with 621 employees and an FY 2023 - 2024 annual budget of \$102.5 million. Its fixed route and LIFT bus services are offered within El Paso City limits. Its fixed routes and LIFT bus services traveled 10.2 million revenue miles in the pre-pandemic year.

The fixed-route service consists of 59 routes with 101 vehicles transporting passengers. These routes provide about 6.6 million bus passenger trips a year. The LIFT service consists of 48 LIFT vehicles and 7,000 participants who made 214,500 trips during the fiscal year 2024. Sun Metro operates a large natural gas-fueled fleet, fueled primarily through alternative fuels – CNG, including all passenger support vehicles.

On November 12, 2018, the El Paso Streetcar began service. The El Paso Streetcar route highlights all the wonderful things that make El Paso downtown and uptown a unique place to visit. The 4.8-mile route runs in two loops through El Paso's uptown and downtown areas. Both loops interconnect through a single-tracked corridor, an international bridge, and an array of businesses, restaurants, government buildings, the Convention Center, the downtown ballpark, and the University of Texas at El Paso, among many other prominent locations. As part of this project, six vintage streetcars (the same vehicles that ran on El Paso streets until 1974) were restored for the rigors of daily service. While the streetcars are decades old, they are outfitted with modern amenities, including:

- Seating for approximately 35 people and additional space for standing riders
- Free Wi-Fi
- ADA Accessibility
- Bike racks
- Air conditioning
- Heating
- Upgrades for safety
- Modern propulsion
- Streetcar branding along the route and signage at designated stops
- Pavement, sidewalk, and driveway improvements at designated stops, Shelters, and Benches



El Paso Streetcar

The highest transportation priority for both the City and Sun Metro is the implementation of a five-line, citywide BRT/TOD corridor system that connects with other regional and local bus services as well as rail, air, and ground transportation. Corridors include:

- International/Downtown/Central El Paso – serviced by the other four corridors, services the international border area to Glory Road and the University of Texas at El Paso campus.
- Mesa/Westside Corridor – services Northwest El Paso and Southeast New Mexico.
- Alameda/North Loop/Mission Valley Corridor – services Alameda Street and far-Southeast El Paso, connecting to an El Paso County-operated Rural Transit line that provides limited fixed-route service to East Montana and the Mission Valley area incorporated cities.
- Montana Corridor – services East and Far East El Paso to the Upper Eastside Transfer Center located off Edgemere Blvd. and RC Poe Rd.
- Dyer Corridor – services Northeast El Paso and Fort Bliss.

Brio, a Spanish word for excitement, verve, and energy, is the term used to describe and brand El Paso's BRT system. In addition to Transit Terminals, each BRT Corridor has several Brio stations that are well-lit and rider-friendly. Amenities include Wi-Fi hotspots, automated Brio status



Brio Roadway and TOD Stations



Sixty-foot Articulated Brio Bus

information boards, and prepaid ticket vending machines. The stations comply with all City, State, and Federal regulations. Where feasible, public art displays selected or designed by the

City's Museums and Cultural Affairs Department Public Art Division are included either as standalone pieces or as components of improvements throughout each corridor.

The 60-foot articulated Brio buses run on CNG fuel with a 400-mile capacity and a seven-minute fill-up time. They are well equipped to keep the modern-day rider comfortable and informed of their destination while staying in touch with work, family, and friends, or just enjoying the ride with amenities such as announcement monitors, Wi-Fi, and bike racks.

Sun Metro received the following FTA funding:

FEDERAL FUNDING TYPE	FY25 FEDERAL FUNDING
FEDERAL TRANSIT ADMINISTRATION (FTA)	
Areas of Persistent Poverty Program	\$ 360,000.00
Buses and Bus Facilities Formula Program - 5339(a)	\$ 10,096,564.00
Capital Investment Grants - 5309	\$ 3,393,813.00
Community Project Funding/Congressionally Directed Spending	\$ 720,000.00
Flexible Funding Programs - Congestion Mitigation and Air Quality Program - 23 USC 149	\$ 4,335,650.00
Helping Obtain Prosperity for Everyone Program	\$ 18,359.00
Low or No Emission Grant Program - 5339(c)	\$ 39,473,712.00
Public Transportation COVID-19 Research Demonstration Grant Program	\$ 1,748.00
Route Planning Restoration Program	\$ 140,361.00
Urbanized Area Formula Grants - 5307	\$ 37,978,965.00
Enhanced Mobility of Seniors & Individuals with Disabilities - Section 5310	\$ 307,040.00
	\$ 96,826,212.00
FEDERAL EMERGENCY MANAGEMENT AGENCY (FEMA)	
Transit Security Grant Program	\$ 841,437.00
TOTAL FEDERAL FUNDING FOR FY25	\$ 97,667,649.00

2. Annual PTASP Review and Update Process

2.1. Control and Update Procedures

Sun Metro maintains a structured and documented process for controlling and updating the Public Transportation Agency Safety Plan (PTASP). In accordance with 49 CFR Part 673 and 49 CFR Part 671, all updates triggered by regulatory changes, safety risk findings, or Roadway Worker Protection (RWP)-specific requirements must be incorporated into this PTASP within **12 months** or sooner if required by FTA, TxDOT SSOA, or internal directive.

The Sun Metro PTASP will undergo an annual review, starting from a baseline date of October 1st, and is updated periodically on an as-needed basis to include:

- **ASP Annual Reviews:** The PTASP is subject to annual reviews.
- Revisions involving Roadway Worker Protection (RWP), redundant protection requirements, RWIC procedures, lone worker rules, or OCC communication standards must be reviewed by the Safety Department immediately upon issuance of new federal guidance.
- The **RWP Program Manager** and **Safety Manager** jointly assess whether revisions to the RWP Manual require corresponding PTASP changes.
- All PTASP revisions must be approved by Sun Metro Executive Leadership and City of El Paso as required.
- Revision documentation will include:
 - Summary of changes
 - RWP program impact assessment
 - Effective date and implementation schedule
- PTASP updates must be communicated to all supervisors, roadway workers, and EPSC staff.
- RTA conducts reviews no later than October 1st each year.
- **Notification to TxDOT:** The RTA must inform TxDOT via email whether the ASP is current or requires updates.
- **Detailed Update Notification:** If updates are needed, the email notification must specify the areas requiring modification and provide an estimated completion date.
- **Submittal of the Draft PTASP:** El Paso Streetcar/Sun Metro will submit a draft of the PTASP on November 15th.
- **Approval Deadline:** The revised ASP must receive approval from each RTA no later than December 31st.
- **Submission Deadline:** The revised ASP must be submitted to TxDOT no later than January 31st.

These processes ensure the PTASP remains current, accurate, and aligned with the evolving needs and standards of our system and comply with the recordkeeping requirements of 49 CFR 673 subpart (E)

The following process is used to update and support the Sun Metro PTASP:

- I. The City of El Paso and Sun Metro personnel will work cooperatively with the Chief Safety Officer or SMS Executive, Accountable Executive, and Sun Metro Management to update their safety record and to evaluate the Sun Metro PTASP effectiveness.
- II. The Sun Metro Safety Managers will review the Sun Metro PTASP and advance proposed updates to the Chief Safety Officer or SMS Executive for review and approval.
- III. The Chief Safety Officer or SMS Executive will forward the updated Sun Metro PTASP and the Streetcar section to TxDOT - SSO for their review and comments.
- IV. The TxDOT - SSO will return the Sun Metro PTASP with the Streetcar section with comments to the Chief Safety Officer or SMS Executive:
- V. The TxDOT-SSO comments of Sun Metro PTASP with the Streetcar section will be reviewed by the Accountable Executive, Chief Safety Officer or SMS Executive, Sun Metro Director of Mass Transit, Chief Streetcar Officer & and the Streetcar Safety Manager.
- VI. If TxDOT-SSO has no comments, they will submit a letter of approval of the Sun Metro PTASP and the Streetcar section. At that moment, the document will be copied and distributed in accordance with EPSC Sun Metro PTASP and the Streetcar section distribution list.
- VII. The approved plan will be published and distributed to all Sun Metro Managers and pertinent Sun Metro members for implementation according to an established distribution list.

2.2. Implementation Activities and Responsibilities

Sun Metro has defined specific tasks to implement the goals and objectives of the System Safety Program Plan. The personal safety and security of passengers and employees are Sun Metro's highest priorities.

2.3. Annual Sun Metro PTASP Review

Before September 1st of each year, Sun Metro will conduct a review of its PTASP and notify TxDOT via email if the PTASP is current or requires an update. If the RTA determines the PTASP must be updated, the notification shall summarize the areas requiring an update and the anticipated date the revised PTASP will be submitted to TxDOT. The revised PTASP must be approved by each RTA no later than December 31st and submitted to TxDOT no later than January 31st, signed by the Director of Mass Transit as the Accountable Executive, indicating the Sun Metro PTASP is current and in compliance with the SSO Program Standard (for the streetcar only).

If the Accountable Executive determines the Sun Metro PTASP is not current, the letter shall detail the activities that will be taken to achieve compliance and the internal deadline for submitting the Sun Metro PTASP and supporting materials to TxDOT for approval.

The Chief Safety Officer or SMS Executive is responsible for the preparation, maintenance, and updating of the Sun Metro PTASP. The Sun Metro PTASP evaluation process for Sun Metro will consist of the following steps:

- I. Sun Metro staff will submit an updated/revised version of the Sun Metro PTASP to the Accountable Executive for review.

- II. After approval from the Accountable Executive (AE), the Chief Safety Officer (CSO) or SMS Executive will submit the PTASP to TxDOT.
- III. TxDOT will acknowledge receipt of a Sun Metro PTASP submission.
- IV. If the submission is approved, TxDOT will acknowledge acceptance within 45 days.
- V. If the submission is not approved, TxDOT will notify Sun Metro to request additional documentation or clarification. Upon receipt of the requested documentation or clarification, the process will begin anew.
- VI. If the Sun Metro PTASP does not comply with federal rules or the TxDOT SSO Program Standard for El Paso Streetcar, the CSO / SMS Executive & AE will be notified via a formal letter. A completed checklist identifying the required changes and any required documentation will be included.
- VII. Upon TxDOT's final acceptance, approval will be communicated via a formal letter to the Accountable Executive.

2.3.1. Control of Documents

Sun Metro will follow established processes for the Control and Distribution of Plans, Manuals, Policies, and Procedures, and the ASP. Documents are reviewed and updated as necessary and re-approved. These documents were last reviewed and modified as necessary following the previous revision of the ASP. The controls needed for implementation are:

- I. Approve documents for adequacy prior to issue
- II. Review and update as necessary, and re-approve documents
- III. Ensure changes and the current revision status of documents are identified
- IV. Ensure current versions of applicable documents are available at points of use
- V. Ensure documents remain legible and readily identifiable
- VI. Prevent the unintended use of obsolete documents and apply suitable identification to them if they are retained for any purpose.

Employees and subcontractors shall use the specified or latest revision of specifications or controlled documents to include documents of external origin.

The employees and contractors will be retrained each time the Sun Metro PTASP is updated. In addition, the distribution list of the Sun Metro PTASP will be used to guarantee every party has the latest version of the Sun Metro PTASP.

Each time the Sun Metro PTASP is updated, all personnel included in the Sun Metro PTASP distribution list and subcontractors will be notified via e-mail. This notification will also include the date when they can pick up the updated version.

2.3.2. Control of Records

Records are established and maintained to provide evidence of conformity to requirements and for the effective operation of the quality management system and compliance with the recordkeeping requirements of 49 CFR 673 subpart (E). Records shall remain legible, readily identifiable, and retrievable. Sun Metro Control of Public Records defines the controls needed for the identification, storage, protection, retrieval, retention time, and disposition of records.

The type of document used will vary depending on the type of activity. The following is a list of activities and the type of document used to document them:

Activity	Type of Document
Inspections	Checklist Photos Evidence that the finding has been corrected
Audits	Notification letters Auditing Checklist Auditing report with supportive documentation Corrective Actions generated by the audit
Safety Meetings	Agendas Attendant Sheet
Training	Agenda Attendant sheet Training material

*Agency Safety Plan (PTASP) and SMS related documents must be kept for no less than 3 calendar years. This is consistent with the Texas Local Government Schedule.

3. Safety Management Policy Chapter (CFR 673.23)

3.1. Safety Management Policy Overview

Sun Metro leadership commits to a proactive safety culture that incorporates roadway worker protections as required by **49 CFR Part 671**. The Safety Management Policy affirms:

- All employees have the **right and responsibility** to use the **Good Faith Challenge** process if they identify unsafe track conditions, missing protections, or unsafe instructions during roadway work.
- Roadway Worker-in-Charge (RWIC) authority is recognized and supported agency-wide; the RWIC has **full stop-work authority** within the roadway work zone.
- Lone workers are restricted to duties allowed under the EPSC RWP Manual and 49 CFR 671.33.
- The Operations Dispatcher must verify redundant protections before authorizing track access.
- No roadway worker may access the trackway without proper training, qualification, and certification.
- Safety performance, including RWP compliance, is incorporated into management accountability.

The Safety Management Policy applies to all employees, contractors, and visitors working on or near the guideway.

3.2. Safety Management Policy Section

Sun Metro's **safety objectives** include the following:

Passenger safety:

- Reduce the number of passenger injuries from falls, slips, and collisions.
- Minimize incidents related to boarding and disembarking.
- Decrease the rate of passenger assaults.

Operational safety:

- Lower the rate of vehicle collisions with other vehicles or pedestrians.
- Reduce mechanical failures and delays due to maintenance issues.
- Improve driver alertness and adherence to safety procedures.

Station safety:

- Implement measures to prevent platform falls.
- Improve lighting and visibility in stations.
- Enhance security measures to deter criminal activity.

Emergency preparedness:

- Develop and regularly practice emergency response plans
- Ensure adequate training for staff on emergency procedures
- Improve communication systems for emergencies

It is our mission to connect people and places, support economic development, and improve the quality of life in the region. Because of this, Safety is of paramount concern.

All personnel and contractors are charged with responsibility for the safety of passengers, employees, property, and those who come in contact with our systems. Specific accountability for safety rests with those responsible for the management of each function or location. Sun Metro management will review the Safety Program's effectiveness, provide resources needed to correct deficiencies, and work with the Texas Department of Transportation and other agencies involved in the oversight of safety to achieve the safest and highest quality system possible.

The Chief Safety Officer or SMS Executive is tasked to devise, implement, and administer a comprehensive, integrated, and coordinated Public Transit Agency Safety Plan (PTASP). It is the responsibility of the Chief Safety Officer or SMS Executive and Sun Metro Key Staff to implement and execute SMS to prevent, eliminate, control, and/or reduce hazards of any system under the jurisdiction of Sun Metro. The Chief Safety Officer or SMS Executive will perform, oversee, and/or review all activities related to hazard management. Management of hazards includes the legitimate right, in coordination with the affected department manager, to stop unsafe operations when the hazard identified poses an imminent danger to life and/or property.

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It is the Sun Metro & and the City of El Paso's policy to fully support an ongoing Safety Program in which preventive concepts are utilized in identifying and resolving hazards. However, the success of the Safety Program depends on the sincere and cooperative efforts and active participation of all employees. It is, therefore, the responsibility of each Sun Metro employee and Contractor to actively participate in the safety process, provide requested information, and support and aid in any investigations.

Approved By

Anthony R. DeKeyser
(Accountable Executive)

Signature

Date

3.3. Performance Target (based on Nat. Pub. Trans Safety Plan)

Safety performance measurement will help the City of El Paso and Sun Metro monitor their safety performance. The measurement and evaluation of safety performance require a carefully structured program of planning, setting targets, identifying valid measures, conducting proper data analysis, and implementing appropriate follow-up activities. Safety performance measurement is a key aspect of a safety management process and provides the basis for continuous safety improvement.

Pursuant to compliance with 49 U.S.C. § 5329(d), the Sun Metro Agency Safety Plan must include safety performance targets based on the safety performance measures in the FTA National Safety Plan. The safety performance measures are:

Safety Performance Measure	Description
<i>Measure 1a – Major Events</i>	This includes all safety and security major events as defined by the NTD.
<i>Measure 1b – Major Event Rate.</i>	This includes all safety and security major events as defined by the NTD, divided by VRM.
<i>Measure 1.1 – Collision Rate (new)</i>	This includes all collisions reported to the NTD, divided by VRM.
<i>Measure 1.1.1 – Pedestrian Collision Rate (new)</i>	This includes all collisions “with a person,” as defined by the NTD, divided by VRM.
<i>Measure 1.1.2 – Vehicular Collision Rate (new)</i>	This includes all collisions “with a motor vehicle,” as defined by the NTD, divided by VRM.
<i>Measure 2a – Fatalities</i>	This includes all fatalities as defined by the NTD.
<i>Measure 2b – Fatality Rate</i>	This includes all fatalities as defined by the NTD, divided by VRM.
<i>Measure 2.1 – Transit Worker Fatality Rate (new)</i>	This includes all transit worker fatalities as defined by the NTD, including the categories “Transit Employee/Contractor,” “Transit Vehicle Operator,” and “Other Transit Staff,” divided by VRM.
<i>Measure 3a – Injuries</i>	This includes all injuries as defined by the NTD.
<i>Measure 3b – Injury Rate.</i>	This includes all injuries as defined by the NTD, divided by VRM.

Safety Performance Measure	Description
<i>Measure 3.1 – Transit Worker Injury Rate (new)</i>	This includes all transit worker injuries as defined by the NTD, including the categories “Transit Employee/Contractor,” “Transit Vehicle Operator,” and “Other Transit Staff,” divided by VRM.
<i>Measure 4a – Assaults on Transit Workers (new)</i>	This includes all assaults on transit workers as defined by the NTD.9
<i>Measure 4b – Rate of Assaults on Transit Workers (new)</i>	This includes all assaults on transit workers as defined by the NTD, divided by VRM.
<i>Measure 5 – System Reliability</i>	This includes Major Mechanical System failures as defined by the NTD.

Successful performance targets are **specific, measurable, attainable, relevant, and time-bound** (SMART). As part of the annual review of Sun Metro's Agency Safety Plan, Sun Metro shall reevaluate its safety performance measures and determine how the measures should be refined, sub-measures developed, and performance targets selected annually.

If the Safety Targets are not met, it will be the responsibility of the City of El Paso and Sun Metro Management to assess the situation and determine the root cause. Once the root cause has been determined, the appropriate Safety Manager, in coordination with the CSO will develop the corrective actions needed to mitigate the situation.

All Sun Metro employees are responsible for following all rules and procedures established by management to achieve the performance measures established in this document.

3.3.1. Major Events

3.3.1.1. Fatalities

Fatality is defined as a death occurring at the scene or within 30 days of the major event and includes suicides. It does not include deaths in or on transit property, which result from illness or other natural causes.

3.3.1.2. Injuries

Injuries are defined as any damage or harm to persons as a result of an event that requires immediate medical attention away from the scene. In addition, FTA has established the term “Serious Injury”. A Serious Injury is defined at 49 C.F.R. § 674.7 as any injury that:

1. Requires hospitalization for more than 48 hours, commencing within 7 days from the date the injury was received;
2. Results in a fracture of any bone (except simple fractures of fingers, toes, or nose);
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.

For the injury safety performance measure, FTA uses the NTD definition of injury (harm to a person requiring immediate medical attention away from the scene). FTA uses injuries reported on both the NTD S&S-40 (major) and S&S-50 (non-major) forms and excludes injuries resulting from assaults and other crimes (security events). This means Sun Metro may have to report a crime-related injury to the NTD, but Sun Metro would exclude that injury when calculating its injury performance measure.

3.3.1.3. Substantial Damage

Damage to any involved vehicles, facilities, equipment, rolling stock, or infrastructure that disrupts the operations of the rail transit agency and adversely affects the structural strength, performance, or operating characteristics of the asset, such that it requires towing, rescue, on-site maintenance, or immediate removal prior to safe operation.

Substantial damage excludes damage that is limited to:

- Cracked windows;
- Dents, bends, or small puncture holes in the body;
- Broken lights or mirrors; or
- Removal from service under the vehicle's own power for minor repair or maintenance, testing, or video and event recorder download

3.3.1.4. Collisions

- Meet an injury, fatality, substantial damage, or evacuation threshold;
- Include suicides, attempted suicides, and assaults or homicides that involve contact with a transit vehicle;
- Occur at a rail grade crossing or intersection;
- Involve an individual;
- Involve a rail transit vehicle and a second rail transit vehicle; or
- Includes collisions that do not involve a transit vehicle but meet a threshold.

Certain instances of rail collisions are automatically reportable, regardless of whether they meet other reporting thresholds.

3.3.1.4.1. Rail Grade Crossing or Intersection Collisions

Any collision involving a rail transit vehicle occurring at a grade crossing or intersection. A grade crossing is defined as any place where a rail guideway used for transit operations is crossed at grade by a road or path, including crosswalks at stations. However, this excludes parking lot entrances or exits and driveways. You must report rail grade crossing collisions, whether or not they meet any other reporting threshold.

3.3.1.4.2. Rail Collisions with an Individual

Any collision between a rail transit vehicle and an individual, regardless of whether the event resulted in injuries. For a collision to occur, the transit vehicle must be in motion. The impact between a stopped transit vehicle and a person is reported as a fall on the Non-Major Monthly Summary form.

3.3.1.4.3. Rail Collisions with another Rail Vehicle

Any collision between a rail transit vehicle and a second rail vehicle. Rail-to-rail collisions are reportable whether or not they meet any other reporting threshold. This includes all collisions between a transit revenue train and another revenue train, a revenue train and a non-revenue rail service vehicle, or between two non-revenue rail service vehicles. Rail transit vehicles exclude hand-powered devices that are not part of a vehicle consist. Report one "Transit vehicle involved" for each revenue train and one "Other vehicle involved" for each non-revenue vehicle. Note: Collisions that do not involve any rail transit vehicles and meet a reporting threshold are reported as Non-Transit Collisions

3.3.1.5. Evacuations

A reportable evacuation is a condition that occurs when persons depart from transit vehicles or facilities for life-safety reasons.

In addition, rail modes must report all evacuations to the controlled rail right-of-way. Evacuations to the right-of-way refer to rail mode only. For example, if a bus breaks down during service, and passengers must evacuate to the sidewalk or highway shoulder lane, you would not report the event unless another threshold is met.

Causes of evacuations that constitute an imminent danger (life-safety) to passengers, employees, contractors, or other persons may include:

- Fires,
- Presence of smoke or noxious fumes,
- Hazardous material spills,
- Vehicle fuel leaks,
- A weapon was fired in a vehicle,
- Electrical hazards,
- Bomb threats,
- Suspicious items,
- Security,
- Power failure (if there is imminent danger to passengers),
- Mechanical failure (if there is imminent danger to passengers), or
- Other events (Other Safety Events).

Evacuations of vehicles or facilities are reportable even if the event is off-property. For example, if there is a called-in bomb threat, gas leak, or fire on adjacent property that causes an agency to evacuate a nearby station, then you must report the evacuation.

Self-evacuations, which occur when people vacate transit property without direction from transit personnel or another authority, are not automatically reportable.

3.3.1.6. Derailment

Both mainline and yard derailments and non-revenue vehicle derailments. You must report any derailment of a rail transit revenue vehicle or a non-revenue service vehicle. This includes both mainline and yard derailments.

If a derailment is a result of a collision, report the event as a collision and include the number of derailed vehicles on the "Rail Transit Train Involved" form. This form is used even if the vehicle was a maintenance vehicle, such as a hi-rail vehicle.)

3.3.1.7. Runaway Train

Events involving a moving runaway train with or without the operator on board. These include movement of a rail transit vehicle on the mainline, yard, or shop that is uncommon, uncontrolled, or unmanned due to an incapacitated, sleeping, or absent operator, or the failure of a rail transit vehicle's electrical, mechanical, or software system or subsystem. (Limited to revenue vehicles.)

3.3.1.8. Safety Events

Safety Events

- Collisions (incl. those involving attempted suicide, suicide, and assault/homicide)
- Fires (suppression)
- Derailments (mainline and yard), including non-revenue vehicles
- Hazardous Material Spills
- Acts of God
- Other Safety Events (events that do not fall into any of the other categories, yet meet a reporting threshold *other than* immediate transport for medical attention for **one** person)

System Security Events

- Bomb Threat/Bombing
- Chemical/Biological/Radiological/Nuclear Release
- Arson
- Sabotage
- Burglary
- Vandalism
- Hijacking
- Cyber Security Events
- Suspicious Package
- Other System Security Events (such as projectiles thrown at vehicles)

Personal Security Events

- Assault (including Assault on a Transit Worker)
- Attempted Suicide
- Suicide
- Homicide
- Motor Vehicle Theft
- Robbery
- Rape
- Larceny/Theft
- Other Personal Security Events

Safety Events for Fixed Route and Paratransit. For the safety event performance measure in these modes, the FTA uses all safety events meeting an NTD major event threshold (events

reported on the S&S-40 form). In other words, for this measure, FTA includes only major safety events and **excludes** major security events (both of which are reported to the NTD). This means Sun Metro may have to report a major security event to the NTD, but would exclude that security event when calculating your safety event performance measure.

3.3.2. System Reliability

The System Reliability measure expresses the relationship between safety and asset condition. The rate of vehicle failures in service, defined as the mean distance between major mechanical failures, is measured as revenue miles operated divided by the number of major mechanical failures. This measures how well the fleet or transit vehicles are maintained and operated.

3.3.3. Safety Performance Measures

For this PTASP, the data used to develop the performance measures were the data for the Fiscal Years 2022 & 2023. Sun Metro's Safety Performance measures are based on the previous year's data. Data acquisition is discussed in Section 5.3.2 of this document.

All performance measures and PTASP updates will be submitted to TxDOT (for Streetcar) and the MPO coordination no later than October 1st of each year. EPSC will conduct a review of its PTASP and notify TxDOT via email if the PTASP is current or requires an update. If EPSC determines the PTASP must be updated, the notification shall summarize the areas requiring an update and the anticipated date the revised PTASP will be submitted to TxDOT. The revised PTASP must be approved by EPSC no later than December 31st and submitted to TxDOT no later than January 31st, as indicated in sec 4.4 of the State Safety Oversight Program Standard dated August 2024.

3.3.4. Sun Metro Performance Table by Mode

Sun Metro Para Transit

Safety Performance Measures	2023	2024	2025*	2026
Total Vehicle Revenue Miles	1994510	2371684	2513985	2773723
Major Events				
Major Events Total	3	5	2	2
Major Events Rate	0.1504	0.2108	0.0795	0.0721
Collision Total	24	32	27	29
Collision Rate	1.2033	1.3492	1.0739	1.0455
Pedestrian Collisions Total	0	1	0	0
Pedestrian Collision Rate	0	0.0421	0	0
Vehicular Collisions Total	16	18	11	14
Vehicular Collision Rate	0.687	0.614	0.437	0.5047
Fatalities	0	0	0	0
Fatality Rate	0	0	0	0
Transit Worker Fatality Rate	0	0	0	0
Injuries	4	3	2	2
Injury Rate	5.36	3.13	2.34	2.16
Transit Worker Injury Rate				
Assaults on Transit Workers	0	0	0	0
Assaults on Transit Workers' Rate	0	0	0	0
System Reliability				

Sun Metro Fixed Route

Safety Performance Measures	2023	2024	2025*	2026
Total Vehicle Revenue Miles	5,712,826	5,589,182	4,331,322	4,331,322
Major Events				
Major Events Total	16	17	17	16
Major Events Rate	0.28	0.30	0.31	0.36
Collision Total	136	136	133	134
Collision Rate	2.38	2.43	2.42	3.09
Pedestrian Collisions Total	4	0	0	0
Pedestrian Collision Rate	0	0	0	0
Vehicular Collisions Total	103	96	141	134
Vehicular Collision Rate	1.80	1.72	1.00	3.0
Fatalities	0	1	0	0
Fatality Rate	0	0.01	0	0
Transit Worker Fatality Rate	0	0	0	0
Injuries	46	43	41	40
Injury Rate	9.23	8.33	8.2	8.0
Transit Worker Injury Rate	6.82	6.82	6.48	6.48
Assaults on Transit Workers	1	2	7	6
Assaults on Transit Workers' Rate	0	0	1.6	1.3
System Reliability	238,000	189,244	240,000	250,000

Sun Metro El Paso Streetcar

Safety Performance Measures	2023	2024	2025*	2026
Total Vehicle Revenue Miles	41,046	66,831	59,299	65,408
Major Events				
Major Events Total	1	0	0	0
Major Events Rate	0.12	0.00	0.00	0.12
Collision Total	8	26	10	10
Collision Rate	0.97	1.93	0.87	0.87
Pedestrian Collisions Total	0	0	0	0
Pedestrian Collision Rate	0.00	0.00	0.00	0.00
Vehicular Collisions Total	8	26	7	7
Vehicular Collision Rate	0.97	1.93	0.61	0.61
Fatalities	0	0	0	0
Fatality Rate	0.00	0.00	0.00	0.00
Transit Worker Fatality Rate	0	0	0	0
	0.00	0.00	0.00	0.00
Injuries	3	1	1	1
Injury Rate	11.53	3.84	0.17	0.17
Transit Worker Injury Rate	27.47	13.73	0.9	0.9
Assaults on Transit Workers	0	1	0	0
Assaults on Transit Workers' Rate	0.00	0.07	0.00	0.00
System Reliability	39,812	22,277	19,766	21,802

3.4. Sun Metro Key Staff - Accountabilities and Responsibilities

The following Key Staff positions are responsible for the implementation of Sun Metro ASP. Sun Metro **has established necessary** authorities, accountabilities, and responsibilities for the development and management of the transit agency's SMS.

Key Staff is responsible for implementing the ASP in their areas and ensuring that all their personnel understand their roles and responsibilities.

3.4.1. Sun Metro Director (Accountable Executive)

Sun Metro's Director of Mass Transit has been designated as the **Accountable Executive** must implement safety risk reduction programs that are included in the Agency Safety Plan and is responsible for directing and coordinating all activities affecting safety within Sun Metro. This individual directs and coordinates all operational personnel by establishing and monitoring program and project objectives. The Accountable Executive will oversee the development and implementation of the processes and procedures, review performance, complete required status changes and timekeeping documents, implement and monitor training, and coordinate efforts with internal Sun Metro departments. The Accountable Executive must satisfy the following functions:

- (1) The Accountable Executive is the final authority over all operations authorized to be conducted on the Sun Metro System.
- (2) Controls the financial resources required for the operations.
- (3) Controls the human resources required for the operations authorized to be conducted.
- (4) Retains ultimate responsibility for the safety performance of the operations conducted.

The accountable executive must accomplish the following:

- (1) Receive and consider all safety risk mitigations recommended by the Safety Committee, consistent with requirements in §§ 673.19(d) and 673.25(d)(6).
- (2) Ensure SMS is properly implemented and performed in all areas.
- (3) Approved and signed the safety policy.
- (4) Communicate the safety policy throughout the organization.
- (5) Regularly review the safety policy to ensure it remains relevant and
- (6) Regularly review the safety performance of the organization and direct actions necessary to address substandard safety performance

The Director of Mass Transit has full authority to speak and act on behalf of the Authority on all operations and maintenance matters, including those involving the safety of passengers, employees, and service property. It is the responsibility of the Managing Director to ensure the organization achieves the system safety goals.

The Director of Mass Transit schedules and attends meetings with the appropriate internal and external staff to exchange information, assess the safety performance of Sun Metro, discuss any safety issues, and serves as the media contact for Mode-specific safety-related inquiries. The Director of Mass Transit is responsible for the performance of all subordinate staff and for ensuring the entire staff's safety responsibilities are consistently carried out professionally and effectively.

The Director of Sun Metro and the Accountable Executive recognize the importance of targeted investments in safety-related projects to achieve the agency's Safety Performance Targets (SPTs). As part of this commitment, Sun Metro will allocate the safety set-aside from Federal Transit Administration (FTA) Urbanized Area Formula Grants (49 U.S.C. 5307) to projects in the following fiscal year that are reasonably likely to assist in meeting or exceeding established safety performance targets.

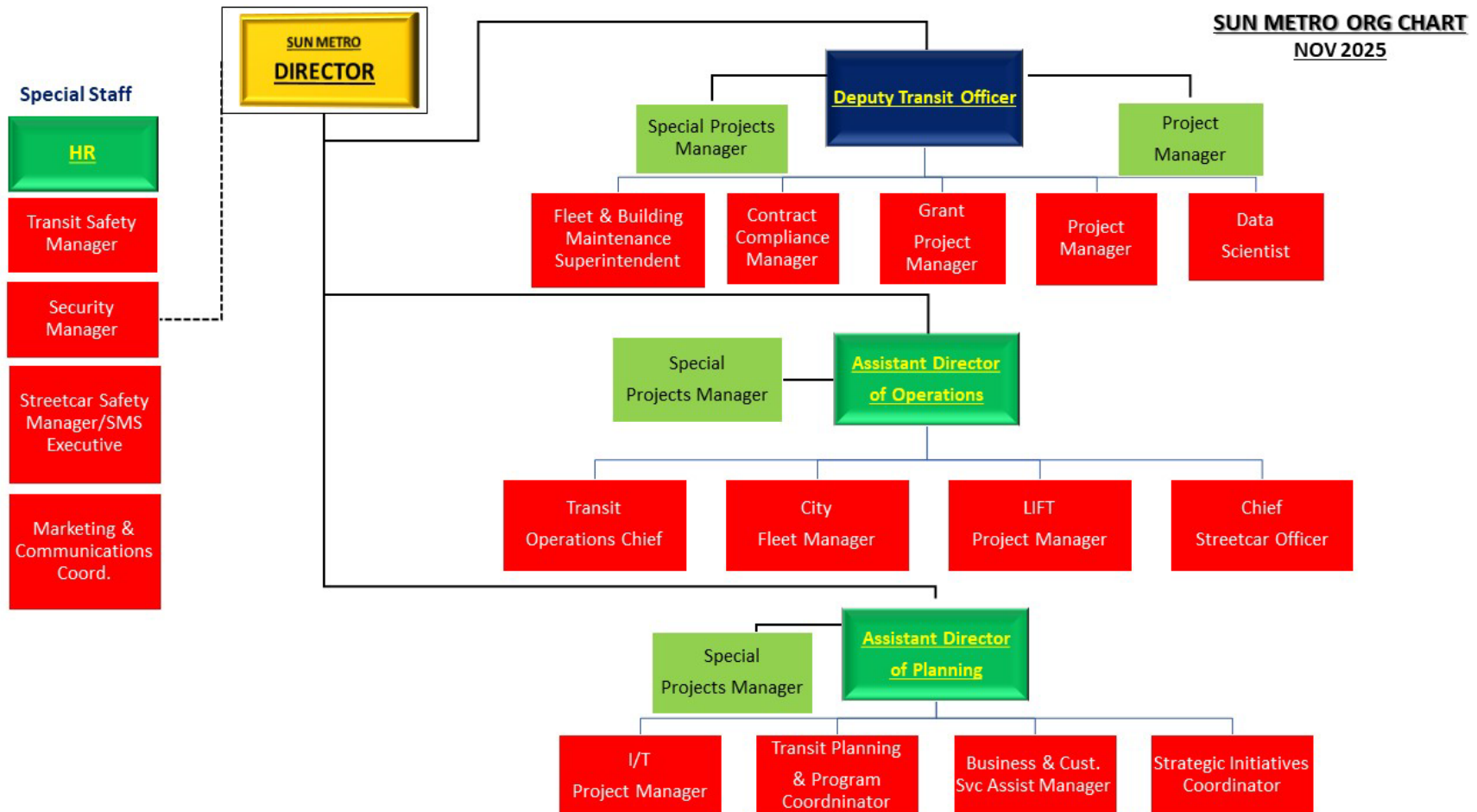
For Fiscal Year 2025, the Director of Sun Metro and the Accountable Executive will prioritize funding for safety-related projects based on:

1. **Risk Assessment Results:** Projects addressing the highest safety risks identified through the Safety Risk Management (SRM) process.
2. **Performance Impact:** Projects expected to significantly contribute to achieving or improving safety performance metrics.
3. **Eligibility Criteria:** Projects compliant with federal requirements under 49 U.S.C. 5307.

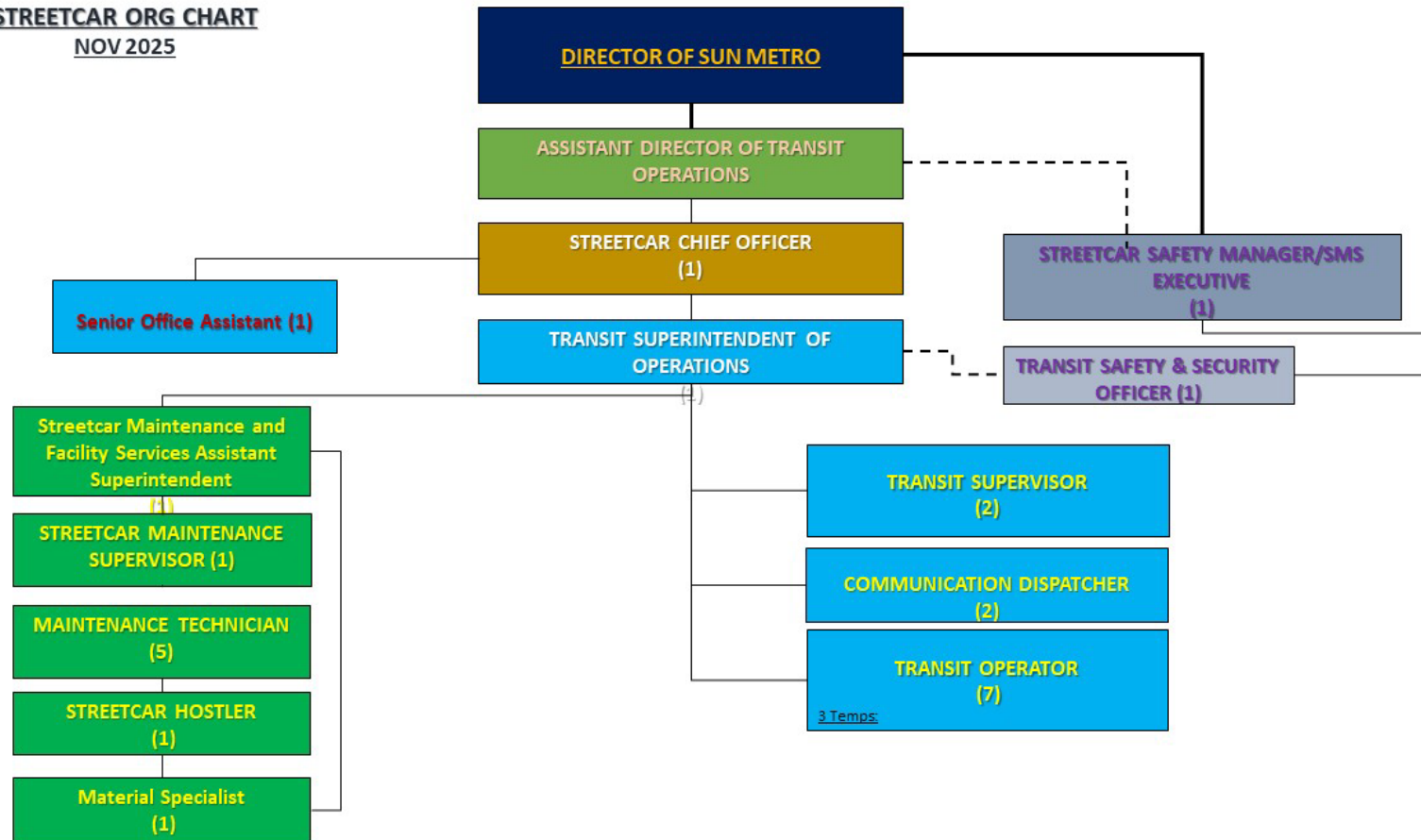
The Director of Sun Metro and the Accountable Executive will review and approve these projects during the agency's annual budget planning process, ensuring that all allocations are aligned with safety priorities and performance goals. Regular performance evaluations will determine the effectiveness of these investments and guide future resource allocation.

Sun Metro Organizational Chart

Sun Metro Safety Department



STREETCAR ORG CHART
NOV 2025



3.4.2. Transit Chief Safety Officer (CSO) or SMS Executive

The Chief Safety Officer or SMS Executive is responsible for overseeing (inspecting, auditing, and following up) the implementation of the Sun Metro Agency Safety Plan. With a direct line of communication to the Accountable Executive, this position will be responsible for the development and implementation of the Public Transit Agency Safety Plan as established in 49 CFR 673 and 674. As defined in 49 CFR 673.5, the Chief Safety Officer or SMS Executive is an adequately trained individual responsible for safety and reports directly to a transit agency's chief executive officer, general manager, president, or equivalent officer. The Chief Safety Officer or SMS Executive will not serve in other operational or maintenance capacities.

At least once every three years, TxDOT shall conduct a Triennial Audit of the EPSC/Sun Metro's implementation of its PTASP. The triennial is considered conducted as of the date TxDOT holds an audit exit debrief with the EPSC/Sun Metro. It will be at TxDOT's discretion whether the Triennial Audit will be conducted as a single onsite assessment or in an ongoing manner over the three-year cycle.

TxDOT or an authorized contractor will create audit checklists based on the RTA's PTASP and related documents. Verification of checklist items will be done through interviews, document reviews, data analysis, field observations, testing, spot checks, and demonstrations by RTA workers and contractors. The audit team will review accident reports, internal documents, safety risk management materials, SMS implementation, and corrective action plans, in line with 49 CFR Part 674 and TxDOT SSO Program Standard. Additional audits, like Drug and Alcohol Reviews and Triennial Reviews, may also be used.

Triennial Audit Process:

Planning and Coordination

- Notify RTA AE and CSO about the audit.
- Coordinate with RTA for scheduling no less than 60 calendar days before the audit schedule, finalize interviews no less than 30 calendar days before the prior to the audit, designate the audit team, and prepare audit plans, checklists, and verification methods.

Conducting the Audit

- Hold an entrance meeting, conduct interviews, review documents, observe operations, take measurements, and assess compliance.
- Provide an exit debriefing with RTA management.

Triennial Audit Report

- State the audit's purpose, evaluate PTASP implementation, identify issues, and recommend updates to the PTASP.

Final Report and Closeout

- TxDOT will issue a draft audit report within 60 days for RTA review. RTA submits comments within 30 days.
- TxDOT finalizes the report within 15 days.
- RTA submits corrective action plans (CAPs) within 30 days. TxDOT reviews and monitors CAP implementation.
- TxDOT closes the audit when all findings are addressed.

The Triennial Audit Report will include noncompliance findings, recommendations for improvement, and an analysis of the PTASP's effectiveness. Recommendations do not require CAPs.

Typical duties of the Chief Safety Officer or SMS Executive are:

- Directing/overseeing the safety program both on-site and on-road in coordination with Homeland Security, State, and Local Law Enforcement
- Serve as the point of contact between the SSOA and the City of El Paso
- Coordinate the development and implementation of Sun Metro's Agency Safety Plan
- Review and update the Agency Safety Plan under 674
- Monitor hazards reported in Sun Metro through the mechanism discussed in Sun Metro's ASP
- Track reported hazards and how they are being mitigated
- Monitoring the effectiveness of the mitigations already implemented for effectiveness/
- Monitor the different logs listed below

- I. Hazard
- II. Corrective Action Plan
- III. Safety Events
- IV. Unusual
- V. Blockage

The CSO must accomplish the following:

- I. Ensure SMS is properly implemented and performed in all areas.
- II. Develop a safety policy.
- III. Communicate the safety policy throughout the organization.
- IV. Regularly review the safety policy to ensure it remains relevant and
- V. Regularly review the safety performance of the organization and direct actions necessary to address substandard safety performance

3.4.3. Streetcar Safety Manager (SSM)

EPSC Safety and Security compliance falls under the responsibility of the Streetcar Safety (SSM) Manager. The position of Streetcar Safety Manager is designated as the CSO / SMS Executive for Sun Metro. This is to include carrying out duties and tasks that are assigned to the CSO / SMS Executive. The SSM verifies and assesses the daily operations of EPSC. This position is based at the EPSC Maintenance & Storage Facility (MSF). From this location, the SSM can monitor the safety of the system.

The SSM has the authority to stop any work or operation if it represents an imminent hazard.

The SSM Manager's duties include:

- Assists in event investigation,
- Performs investigation of security breaches,
- Conducts random inspections,
- Performs annual safety audits,
- Manages hazard analysis,
- Provides safety & security training,
- Conducts threat and vulnerability assessments, and
- Responsible for all System Safety regulatory reporting requirements.
- Ensure SMS is properly implemented and performed in the El Paso Streetcar.
- Develop the safety policy for El Paso Streetcar.
- Communicate the safety policy throughout the El Paso Streetcar.
- Regularly review the safety policy to ensure it remains relevant and
- Regularly review the safety performance of El Paso Streetcar and direct actions necessary to address substandard safety performance.

The SSM responsibilities in the day-to-day activities may include, but are not limited to:

- Directing/overseeing the overall safety operations of job sites and onboard systems that include reporting and conducting safety meetings.
- Directing/overseeing the development and implementation of training programs (i.e., new streetcar operator, safety policy courses, passenger/assistance service sensitivity classes, etc.)
- Directing/overseeing the security program for all facilities (including on-road), remote surveillance, and onboard camera systems
- Training staff
- Developing and monitoring the contents of classroom training to ensure compliance
- Investigate Safety Events, hazardous conditions, and work-related injuries, including event reports, event files, and event register, and follow up with the claims office and adjusters as needed.
- Planning, scheduling, and conducting monthly safety meetings based on Sun Metro safety and security training goals and objectives
- Setting up regular safety event review committees to determine the preventability of an event.

- Addressing employee safety complaints.
- Developing and maintaining the Operational Hazard Analysis Log
- Assisting the Chief Safety Officer or SMS Executive with Corrective Action Plans (CAPs) implementation and follow-up.

3.4.4. Transit Safety Manager (Fixed-Route)

The Transit Safety Manager verifies and assesses the daily operations of Sun Metro Bus operations (Fixed Route). This position is based at the Sun Metro Transit Operation Center (TOC). From this location, the Transit Safety Manager can monitor the safety of the system. The Transit Safety Manager manages the activities of the division and establishes policies and procedures.

The Transit Safety Manager has the authority to stop any work or operation if it represents an imminent hazard. This position is responsible for:

- Departmental compliance with federal, state, and City safety ordinances, laws, and administration safety policies and procedures.
- Planning and conducting research, and preparing technical transit safety research and analysis.
- Evaluating findings, identifying significant issues, determining options, and developing recommendations on complex transit safety projects.
- Evaluating project compliance with safety requirements.
- Managing claim litigation and coordination of Safety Events involving transit personnel and/or property. Draft, review, and recommend revisions to departmental insurance policies. Write specifications for insurance quotations.
- Overseeing the cost of insurance, events, and claim settlements to initiate cost containment programs and prepare management reports outlining cost reduction strategies.
- Overseeing safety training classes and safety meetings of subordinate personnel.
- Managing environmental compliance activities.
- Overseeing compliance activities related to environmental protection.
- Recommending corrective actions related to environmental protection.
- In coordination with the CSO direct federal safety audits and respond to external agencies' audit findings. Complete and submit safety reports to regulatory agencies.
- With the support of the CSO, serve as a liaison with federal, state, and city agencies and departments.
- Perform preliminary assessments, such as identifying environmental conditions.
- Overseeing and coordinating environmental assessments performed by outside consultants.
- Reviewing environmental impact statements completed by consultants. Evaluate project compliance with environmental requirements.
- Represent the City at various meetings, conferences, and formal proceedings and interact with a wide range of officials, regulatory agencies, civic and professional organizations, the media, department directors, coworkers, and the public.
- Testifying in formal proceedings regarding insurance-related matters, subrogation, litigation, and safety event/injury investigation.

- Conducting presentations pertaining to the status of operational plans to elected officials, steering and policy advisory committees, civic and business groups, and the public.
- Serving as a technical adviser to contractors and City officials.
- Advising higher-level supervisors in a timely manner of situations or issues that have or could lead to deviation from expected results, and recommending appropriate solutions or options.
- Performing division general and fiscal administration and miscellaneous professional and managerial functions as required.
- Involves:
 - Participate in setting performance goals and priorities that contribute to the departmental mission.
 - Monitor and approve an allocation of operational expenses for the area of responsibility.
 - With the support of the CSO/SMS Executive, prepare recommendations and justify division programs and capital funding to assist in the preparation of the department's budget and control expenditures.
 - Plan, develop, implement, and administer components of the information system to establish and maintain timely and accurate reporting and recording pertaining to functions managed.
 - Perform duties of a higher-level supervisor, peers, or subordinates to ensure continuity of operations.
 - Ride transit vehicles as a passenger periodically to observe operations. Oversee preparation of activity reports.
- Supervising assigned personnel.
- Scheduling, assigning, and checking work.
- Conducting employee performance appraisals and review evaluations by subordinate supervisors.
- Provide training and development.
- Enforce personnel rules and regulations and work behavior standards firmly and impartially.
- Meeting with staff on a regularly scheduled basis.
- Counseling, motivating staff, and maintaining harmony.
- Interviewing applicants.
- Recommending hiring, termination, transfers, discipline, merit pay, or other employee status changes.

3.4.5 Sun Metro Assistant Director of Transit Operations

Sun Metro Assistant Director of Transit Operations, please refer to the Sun Metro Organizational chart.

Typical Duties are:

- Plan, organize, and oversee daily operational activities. Involves:
 1. Manage the division to include fixed routes, rapid transit (BRIO), and dispatch operations.

2. Participate in the development and implementation of transit operations policies, goals, and standards to provide safe, reliable, cost-effective, and customer-friendly bus service.
 3. Direct all aspects of transit operations, including ridership, on-time performance, quality of service, and fare collection.
 4. Make recommendations and resolve sensitive and controversial operations issues, including customer complaints when necessary.
 5. Coordinate with other department divisions to ensure appropriate resources are available for all operations.
Prepare correspondence regarding department operations, policies, and procedures.
- Direct administrative and procedural studies of transit operations and maintenance to review cost-effectiveness and recommend service improvements. Involves:
 1. Research and analyze operational statistics. Prepare divisional budgets and monitor and control budgets.
 2. Direct operational programs such as Training and Development, and Expansion of Service Methods and Area.
 3. Oversee the Transit Facility and Fleet Maintenance program to include fueling and inventory control methods.
 4. Provide technical expertise in support of vehicle acquisitions, including specification preparation.
 5. Maintain awareness of current Federal Transit Administration (FTA) regulations and federal, state, and local legislation pertaining to transit operations, including drug and alcohol testing regulations and accessibility requirements.
 6. Adjust procedures as necessary to maintain compliance.
 7. Participate in audits or federal grant regulatory compliance and development of cost allocation plans.
 8. Substitute for department head and other division heads during absences, if delegated, to maintain continuity of services and operations. Represent the department at committee meetings such as the Citizen Advisory Committee and Mass Transit Board, communicate with ridership, the media, and citizen groups, and while at transit industry events.
 - Oversee and manage fixed-route transit service and systems planning, scheduling, data collection, and service analysis activities. Involves:
 1. Develop operational service planning studies.
 2. Analyze performance data and key performance indicators.
 3. Coordinate programs related to bus stops, shelters, and transit centers. Identify transit service needs, prioritize improvements, and determine resources required for implementing modified or new service(s).
 4. Oversee analysis and scheduling of major service changes and communicate changes to the affected public.
 5. Oversee the route shift-bidding process.

6. Oversee management of system performance measurement, route evaluation, and bus stop inventory database.
 7. Evaluate trip planning, ridership, route efficiency, and accessibility.
 8. Oversee the retrieval of manual and automated passenger counts and on-time performance data, so it may be reported to the Federal Transit Administration (FTA).
 9. Coordinate with the Fixed Route Operation division and other departmental staff to implement service delivery plans and other programs such as the Automated Vehicle Locator (AVL).
 10. Coordinate service for general and special event operations that include Fixed Route and Streetcar Operations.
 11. Analyze and evaluate division operations to assess long and short-range transit planning for strategies, resources, and needs.
 12. Coordinate with other city departments and entities such as the Texas Department of Transportation (TXDOT) and Metropolitan Planning Organization (MPO) on long-range or regional transit planning and development projects.
- Supervise assigned staff. Involves:
 1. Schedule, assign, instruct, guide, and check work.
 2. Appraise employee performance and review performance appraisals completed by subordinate supervisors.
 3. Provide training and development.
 4. Enforce personnel rules and regulations and work behavior standards firmly and impartially.
 5. Counsel, motivate, and maintain harmony. Interview applicants.
 6. Recommend hiring, discipline, merit pay, or other employee status changes.

3.4.6 Chief Streetcar Officer

The Chief Streetcar Officer **Monitors and oversees** the management of Sun Metro's Streetcar system. As a Sun Metro employee, this managerial position reports to the Director of Mass Transit. The position directs and manages all staff and contractors to ensure compliance with established Sun Metro's system policies, directives, regulations, and ordinances (city, state, and federal) and both the Standard Operating Procedures (SOP) and Standard Maintenance Procedures (SMP) in all phases of operation and maintenance. Under general direction, oversee, direct, and manage streetcar operations and streetcar maintenance, and facility functions.

Among the duties are:

- Plan and organize the development of streetcar operations. Involves: Analyze and evaluate division operations to assess the Streetcar program and project objectives to determine strategies, resources, and needs.
- Develop short and long-range plans. Involves: Monitor trends, establish benchmarks, and implement modifications and improvements. Ensure compliance with all federal, state, local, and agency requirements set forth by the Federal Transit Administration (FTA).
- Establish goals and performance objectives for staff availability and performance. Involves: Maintain reliable and high-quality streetcar service by ensuring appropriate scheduling of

personnel and training. Monitor ridership trends and analyze data. Recommend and monitor completion of service upgrades and modifications, monitor workflow, and monitor expenditures.

- Direct and control the streetcar maintenance and facility, and oversee streetcar maintenance and repair of rail equipment, including vehicles, track, and stations. Oversee inventory control methods. Ensure compliance with equipment manufacturer specifications, coordinate operational requirements with maintenance staff, and report equipment failures.
- Participate in new operational design, coordinate activities internally with outside vendors and contractors, and manage and participate in configuration control programs. Prepare, monitor, and control divisional budget.
- Supervise assigned professional, supervisory, and administrative support personnel. Involves: Schedule, assign, instruct, guide, and check work. Appraise employee performance and review evaluations by subordinates.
- Provide for training and development; enforce personnel rules and regulations, and work behavior standards firmly and impartially. Counsel, motivate, and maintain harmony. Interview applicants. Recommend hiring, termination, transfers, discipline, merit pay, or other employee status changes.

3.4.7 Streetcar Superintendent of Operations

The Streetcar Superintendent of Operations position is located at the MSF facility. This position oversees and manages the streetcar revenue operations. The tasks that are to be carried out by the SSO are listed, but are not limited to below:

- Assists in planning, organizing, coordinating, and directing streetcar operations through subordinate supervisors to ensure timely, efficient, and safe customer service. Involves:
 1. Provide guidance and direction to subordinate supervisors in route and shift coverage to ensure timeliness of service, customer satisfaction, and compliance with safety requirements set forth by Federal Transit Administration (FTA) regulations and motor carrier requirements. Monitor daily operations, meet with route supervisors on service-related issues such as road closures or special assignments, and maintain and analyze complaint files for service improvement.
 2. Issue written or oral instructions to transit supervisors and dispatchers. Monitor overtime and other operating expenses.
 3. Oversee and monitor the streetcar to ensure sufficient staffing to facilitate the orderly movement of passengers.
- Investigate and respond to complaints from public officials, other departments, or the general public. Involves:
 1. Provide accurate information to inquiries, and respond to complaints, including complaints from individuals who may be irate. Ensure that safety events or complaints are properly investigated.
 2. Represent the City in administrative hearings. Interact with other departments, supervisors, co-workers, and the public.
- Supervise assigned personnel. Involves:

1. Assign, schedule, and monitor work.
 2. Appraise employee performance and review subordinates' appraisals.
 3. Provide training and development.
 4. Counsel, motivate, and maintain supervisor-subordinate harmony.
 5. Identify and resolve staff differences, conflicts, and deficiencies. Investigate grievances, take statements, and make recommendations. Interview applicants.
 6. Recommend hiring, discipline, termination, merit pay, or other employee status changes.
 7. Enforce personnel rules and regulations, and work behavior standards firmly and impartially.
 8. Monitor and ensure equitable distribution of overtime.
 9. Promote the observation of safe work practices.
 10. Monitor sick leave abuse and oversee vacation sign-up.
- Perform related managerial or supervisory duties as required. Involves:
 1. Perform duties of the immediate supervisor or subordinates to ensure continuity of operations.
 2. Respond to major events or emergencies to ensure proper investigation.
 3. Attend meetings to represent the department, such as the Sun Metro's Citizens' Advisory Committee, or Workers' Compensation hearings.
 - Supervise assigned personnel. Involves:
 1. Schedule, assign, and check work.
 2. Appraise employee performance and review evaluations by subordinate supervisors.
 3. Provide for training and development.
 4. Enforce personnel rules and regulations and work behavior standards firmly and impartially.
 5. Counsel, motivate, and maintain harmony. Interview applicants.
 6. Recommend hiring, termination, transfers, discipline, and merit pay or other employee status changes.

3.4.8 Transit Superintendent of Fixed Route Operations

The Transit Superintendent of Operations position is located at the TOC facility. This position oversees and manages the fixed-route operations. The tasks that are to be carried out by the TSO are listed, but are not limited to below:

- Assists in planning, organizing, coordinating, and directing transit fixed route operations through subordinate supervisors to ensure timely, efficient, and safe customer service. Involves:
 1. Provide guidance and direction to subordinate supervisors in route and shift coverage to ensure timeliness of service, customer satisfaction, and compliance with safety requirements set forth by Federal Transit Administration (FTA) regulations and motor carrier requirements. Monitor daily operations, meet with route supervisors on service-related issues such as road closures or special assignments, and maintain and analyze complaint files for service improvement.

2. Issue written or oral instructions to transit supervisors and dispatchers. Monitor overtime and other operating expenses.
 3. Oversee and monitor fixed routes to ensure sufficient staffing to facilitate the orderly movement of passengers.
- Investigate and respond to complaints from public officials, other departments, or the general public. Involves:
 1. Provide accurate information to inquiries, and respond to complaints, including complaints from individuals who may be irate. Ensure that safety events or complaints are properly investigated.
 2. Represent the City in administrative hearings. Interact with other departments, supervisors, co-workers, and the public.
 - Supervise assigned personnel. Involves:
 1. Assign, schedule, and monitor work.
 2. Appraise employee performance and review subordinates' appraisals.
 3. Provide training and development.
 4. Counsel, motivate, and maintain supervisor-subordinate harmony.
 5. Identify and resolve staff differences, conflicts, and deficiencies. Investigate grievances, take statements, and make recommendations. Interview applicants.
 6. Recommend hiring, discipline, termination, merit pay, or other employee status changes.
 7. Enforce personnel rules and regulations, and work behavior standards firmly and impartially.
 8. Monitor and ensure equitable distribution of overtime.
 9. Promote the observation of safe work practices.
 10. Monitor sick leave abuse and oversee vacation sign-up.
 - Perform related managerial or supervisory duties as required. Involves:
 1. Perform duties of the immediate supervisor or subordinates to ensure continuity of operations.
 2. Respond to major events or emergencies to ensure proper investigation.
 3. Attend meetings to represent the department, such as the Sun Metro's Citizens' Advisory Committee, or Workers' Compensation hearings.
 - Supervise assigned personnel. Involves:
 1. Schedule, assign, and check work.
 2. Appraise employee performance and review evaluations by subordinate supervisors.
 3. Provide for training and development.
 4. Enforce personnel rules and regulations and work behavior standards firmly and impartially.
 5. Counsel, motivate, and maintain harmony. Interview applicants.
 6. Recommend hiring, termination, transfers, discipline, and merit pay or other employee status changes.

3.4.9 Sun Metro Transit Assistant Superintendent of Operations

Sun Metro has three Transit Assistant Superintendent of Operations positions that are located at the TOC facility. These positions oversee and manage the fixed-route operations. The tasks that are to be carried out by the TASO are listed, but are not limited to:

- Plan, organize, and supervise the daily transit operations through subordinate employees. Involves:
 1. Monitor daily operations and provide guidance and direction to transit operators, communication dispatchers, and transit supervisors to provide superior transit service and ensure timeliness and customer satisfaction.
 2. Promote and implement compliance with safety requirements set forth by Federal Transit Administration (FTA) regulations and motor carrier requirements.
 3. Meet with transit operators, communication dispatchers, and transit supervisors daily to identify and resolve problems and allocate supervisor and dispatcher assignments. Assist with personnel-related issues such as sick leave abuse notifications, miss-outs, and issuance of written or oral instructions to transit operators, dispatchers, and transit supervisors.
 4. Evaluate and ensure compliance with safety and training requirements.
- Oversee and participate in compliance activities related to transit operations.
 1. Coordinate training and maintain records.
 2. Coordinate the transport of safety-sensitive operations employees to random drug testing sites.
 3. Monitor overtime and other operating expenses related to transit operations.
 4. Maintain statistics and generate periodic reports on services furnished.
 5. Monitor calls received and follow up with transit operator complaints or issues regarding service or units.
 6. Ensure that safety events, unsafe acts, and complaints are properly documented and reported.
 7. Monitor staffing levels and shift assignments for transit operators, dispatchers, and transit supervisors.
 8. Recommend service modifications to better accommodate customer needs.
 9. Review documentation submitted by Transit Operators, Dispatchers, and Transit Supervisors for accuracy prior to submission to the Superintendent or other divisions.
- Perform and conduct various administrative responsibilities. Involves:
 1. Identify, create, and introduce improvements to workflow, training, equipment, and other operational areas.
 2. Respond to inquiries, questions, and requests for information.
 3. Draft and provide written and oral responses.
 4. Consult with the department planning and scheduling staff on the transit operator sign-up.

5. Coordinate and execute the transit supervisor and dispatcher sign-up, transit supervisor and dispatcher coverage, transit operator vacation sign-up, transit supervisor vacation sign-up, transitional duty assignments, and other special projects.
 6. Assist the safety division in the planning and preparation of new transit operator trainee classes and transit operator trainer assignments.
 7. Assist the Superintendent in resolving problems and responding to customer service complaints, including complaints from individuals who may be irate.
 8. Attend meetings as required to provide information and respond to concerns from co-workers, other departments, and the public.
 9. Make recommendations for improvement of services.
- Perform related managerial or supervisory duties as required. Involves:
 1. Perform duties of the immediate supervisor or subordinates to ensure continuity of operations.
 2. Recall employees to work in emergencies.
 3. Assist the Superintendent with the solution of grievances.
 4. Promote the observation of safe work practices.
 - Supervise assigned personnel. Involves:
 1. Schedule, assign, and check work.
 2. Appraise employee performance and review evaluations by subordinate supervisors.
 3. Training and development.
 4. Enforce personnel rules and regulations and work behavior standards firmly and impartially. Counsel, motivate, and maintain harmony.
 5. Interview applicants, hiring, termination, transfers, discipline, merit pay, or other employee status changes.

3.4.10 Transit Safety & Security Officer

Sun Metro has five Transit Safety and Security Officers who are assigned to the Safety Division. Four reports to the Transit Safety Manager, and one report to the Streetcar Safety Manager. The TSSO's duties include, but are not limited to, the following:

1. Plan, organize, coordinate, and oversee transit-related risk management programs, including quality assurance issues or projects, workers' compensation, and safety programs.
2. Involves: Develop and implement policies, procedures, and internal controls related to compliance with health, safety, security, and environmental rules and regulations. Identify health and safety risks and recommend corrective actions to control and limit the City's liability.
3. Investigate claims of damage or injury reported by passengers, pedestrians, or other drivers.
4. Coordinate legal issues or concerns with the City Attorney's office, liability insurance adjusters, or external legal counsel and represent the City's interest in mediation, settlement negotiations, or trials.

5. Coordinate quality assurance inspections, such as post-accident and post-employee injury inspections and monitoring.
6. Oversee and participate in compliance activities related to environmental protection, such as alternative fuels, stormwater, and fuel storage, and coordinate corrective action or response to audit findings.
7. Assist the Transit Safety Manager with coordination of the federally mandated drug and alcohol testing program, including pre-employment, post-accident, reasonable suspicion, random, return to duty, and follow-up testing for safety-sensitive positions.
8. Assist with federal safety audits and complete and submit safety reports to regulatory agencies.
9. Plan, coordinate, and deliver training programs. Involves: Conducting needs assessment, program planning, development, and presentation of training and instructional materials. Monitor program effectiveness, track attendance, and prepare periodic reports. Prepare, edit, and coordinate the production of training materials or coordinate the efforts of contractual trainers.
10. Provide classroom and behind-the-wheel or pedal time training to new Transit Operators and provide retraining to current Transit Operators.
11. Provide training in areas such as defensive driving, back injury prevention, commercial driver licensing, supervisory training, hazardous materials, accessibility compliance, sexual harassment prevention, or other subjects related to transit operations to enhance performance or ensure compliance with state and federal requirements.
12. Respond to complaints from public officials, other departments, or the general public.
13. Provide accurate information to inquiries, and respond to complaints, including complaints from individuals who may be irate.
14. Ensure that safety events, unsafe acts, and complaints are properly investigated. Conduct on-the-scene event investigations. Interact with other departments, supervisors, co-workers, and the public.
15. Coordinate and participate in the department's Event Review Board (ARB) committee meetings.

3.4.11 Sun Metro LIFT

Since 2012, Sun Metro has outsourced the paratransit division to MV Transportation, a national third-party vendor. After the initial agreement ended in 2019, MV was awarded a new 10-year contract through a competitive RFP process. The new contract states that MV is responsible for providing all staffing resources to run a turn-key operation while the City provides the operations and maintenance facility, fuel, scheduling software, and buses. The service is paid for by the performed trip and a fixed monthly fee while maintaining a set of key performance measures with corresponding incentives and disincentives. MV is then responsible for the following:

- Deliver a fully functional ADA paratransit operation as outlined in the 2019-607R contract.
- The hiring of all necessary personnel includes drivers, supervisors, dispatchers, schedulers, call center staff, mechanics, and supervisors.

- The maintenance of the facility, buses, equipment, landscaping, and bus wash.
- All operational expenses include utilities, uniforms, LIFT passenger flyers and correspondence, vehicle cellular charges, and all costs associated with running the service.
- Create, execute, and maintain a fully functional eligibility program that includes a new conditional eligibility component.
- Management of all subcontractors to ensure delivery of the highest quality and lowest cost paratransit service, and that they meet all FTA and City requirements.
- Implementation of their Safety SMS program that adheres to all FTA requirements. Sun Metro does not have its SMS program for paratransit; instead, it relies on MV's safety program, namely its "

In addition to providing MV with the facility, buses, fuel, and technology, the City will also provide a contract compliance manager who regularly reviews the performance measures and other contractual obligations.

The following are the main contractual obligations and key performance measures: **Sun Metro Standards.**

Standard	Disincentive	Expected	Incentive
In-Window On-Time	<90.0%	90-92.9%	>93%
Ride-Time Compliance*	<97%	97-98.9%	>99%
Call Center Response Time * (Calls answered within 2 mins)	<90%	90-92.9%	>93%
Complaints per 10K trips *	>=13	10-12.9	<10
Customer Satisfaction Rating*	<4.0	4.0-4.5	>4.5
Miles between Road Calls	<75K	75K-90K	>90K
Preventative Maintenance	<98%	99-99.9%	100%
Safety (Collisions)	>1.3	1.0-1.3	<1.0
Passenger Safety Events/10K trips*	>1.0	.6 - .9	<.6

Sun Metro LIFT Safety SMS Program

MV provides a Safety and Operations Manager who manages the paratransit safety program in compliance with State and Federal regulations and Corporate and Client policies. This position ensures:

- All operators are current with company and contractor training requirements.
- All operators are adequately certified, and certification records and files are kept up to date.
- All employees are current with the training required for general safety programs and practices.
- The local facility is operated in compliance with OSHA and EPA regulations.
- All new hire candidates meet minimum general qualifications and receive all required training prior to being placed into revenue service.

- Liability and Worker's Compensation Claims are handled appropriately, promptly, and in conjunction with contractor staff and resources.
- The Drug and Alcohol Testing program is implemented and complies with Federal and TxDOT regulations as specified in 49 CFR Part 655.
- Employee turnover is minimized through initial and ongoing training aimed at improving operator skill levels, as well as through a complete and appropriate screening process.
- Consistent reductions in preventable and non-preventable vehicle and non-vehicle safety events.
- Dynamic and appropriate ongoing training programs for all operators.
- Safety Incentives and programs are managed effectively and consistently. A consistent Safety Culture throughout the location incorporates operations, safety, and maintenance departments and emphasizes the team approach and individual responsibility of all employees to achieve the common goal.
- Successful completion of all related audits, including those conducted by MV, City, FTA, or external auditors.
- Recruit and screen potential new hire operator candidates to be placed into training, ensuring that efforts meet the staffing needs of the project.
- New hire and veteran operator training programs are managed to ensure all operators receive the minimum initial training and all employees receive required annual and ongoing training.
- Community outreach is implemented to identify potential new hire candidates as well as the most appropriate recruiting sources.
- Provide and/or manage the classroom and behind-the-wheel instruction in all aspects of vehicle operation in the course of passenger transportation, including defensive driving, service area familiarization, passenger loading, unloading, and securement, proper manifest documentation, use of on-board equipment, safety events, emergency procedures, dispatch and radio communications, and passenger sensitivity.
- Provide and/or manage monthly or annual ongoing/refresher training in topics relevant to the service and service area in a timely manner.
- Respond to and/or provide for trained staff response to operator Safety Events, ensuring appropriate collection of information, documentation of events, and reporting per MV's internal policy. Review all vehicular, passenger, and employee Safety Events for determination of cause and preventability, identifying potential trends to be addressed in future training efforts, as well as ensuring retraining and safety points are assessed according to MV's policy.
- Manage all aspects of the Drug and Alcohol Testing program, including pre-employment, random, and post-accident testing requirements. Conduct regular reviews of local testing facilities, ensuring compliance with City, MV corporate, and federal policy.
- Establish functional Safety Committees of operators and staff to review safety concerns and make recommendations to management for potential additional safety efforts.
- Assist operations and maintenance departments in identifying additional or refresher training needs based on current trends within the employee base.

Work with City & MV corporate claims staff to ensure all liability and workers' compensation claims are handled promptly and effectively in an effort to reduce financial liability as well as recoup all claims that can be subrogated.

- Proactively manage all employee injury claims to minimize lost time and modified duty claims. Work with local medical facilities to ensure injured employees are returned to full-duty status promptly.
- Conduct regular audits of employee training files, vehicle maintenance files, and facility safety audits, ensuring compliance with OSHA and EPA regulations and related MV corporate policies.
- Ensure operator performance reviews, ride-a-longs, road checks, and evaluations are conducted according to local policies and MV corporate policy and requirements. Provide feedback and follow-up for operator performance reviews and identify individual training needs where necessary.
- Ensure all project training materials are current, necessary supplies are available, and inventories are secured and kept up to date.
- Provide regular reports to local and MV corporate management staff of safety department efforts, claims status, training efforts, event history, workers' compensation claims status, and other required information.

3.5 Employee Safety Reporting

Safety reporting is an essential part of SMS. Sun Metro must foster an atmosphere of trust that encourages and rewards employees for providing safety-essential information to Senior Management, even if it is self-incriminating, without fear of reprisal. Reports and concerns are communicated to management & Senior Management, so they are assessed and mitigated. If required, the hazard or concern could be elevated to upper management for additional actions.

As we know, self-reporting is a process that, if what happened was a real mistake, the focus will be on re-education and not on punitive action.

There are many ways employees can report safety conditions:

- Report conditions directly to the dispatcher, who will add them to the Transit Master Operation Event Report.
- Report conditions anonymously via a locked comment box in the driver area.
- Report conditions using their name or anonymously to hazard@elpasotexas.gov
- Report conditions directly to any supervisor, manager, or director.

CSO discusses actions taken to address reported safety conditions during the quarterly SSRC Meetings. Additionally, if the reporting employee provided his or her name during the reporting process, the CSO or designee follows up directly with the employee when Sun Metro determines whether or not to take any action, and after any mitigations are implemented.

Hazards reported by employees are reported to the CSO and the Mode Safety Manager. The Mode Safety Manager is responsible for directly addressing the reported hazard. The CSO will provide support and track the management of the reported hazard. The CSO will report to upper management on how the hazards reported are managed.

An effective SMS empowers employees with the confidence to raise concerns that may lead to serious safety/quality concerns and assures them that someone will listen to them and investigate their issues or concerns in a professional manner — all without fear that they will face unduly harsh penalties for admitting to genuine mistakes.

A robust employee safety reporting system will provide:

- Unique – Information you can't get any other way
- Authentic – Individuals who know best are directly providing the information
- Timely – Direct reporting overcomes the time lag of mandatory reporting processes
- Diverse Information from different individuals with different experiences and perspectives
- Comprehensive – Multiple reports over time reveal patterns, trends, and the scope of an issue

The Sun Metro will implement an Employee Self-Reporting program that will:

- Encourage employees to report any safety-related situation
- Emphasize benefits for safety, not safety record
- Establishes clear guidelines for unacceptable behavior
- Balance learning and accountability
- Establishes several methods for employees to report safety issues.

The following table presents a guideline for cases of safety events:

Human Error	At-Risk Behavior	Reckless Behavior
An inadvertent action – slip, lapse, mistake	A choice – risk not recognized or believed justified	Conscious disregard of unreasonable risk
Manage through: ➤ Processes & procedures ➤ Checklists ➤ Training ➤ Design	Manage through: ➤ Increase situational awareness ➤ Remove at-risk behavior ➤ Encourage safe behavior	Manage through: ➤ Remedial action ➤ Punitive action

Employees are expected to tell others when witnessing unsafe work practices or conditions. When employees are not comfortable discussing these unsafe conditions with fellow employees, they are encouraged to discuss the situation with management or report it in writing.

What is important to emphasize is that any cultural change in the organization will take time (months to years) to be fully implemented and see the results of these changes.

3.5.7 Disciplinary Policy

To ensure a culture of open reporting in Sun Metro, in the majority of the cases, no disciplinary action will be taken against any employee who **reports** a safety hazard or concern using the proper channels provided by Sun Metro and the City of El Paso. If the reporting of the hazard or

concern indicates, beyond any reasonable doubt, an illegal act, gross negligence, or a deliberate/willful disregard for Sun Metro or City of El Paso rules and regulations, the employee will be subject to disciplinary actions.

The Sun Metro Rules and Regulation Manual will serve as the guidelines for the implementation of disciplinary actions regarding Events. The Human Resources Department of Sun Metro will be responsible for interpreting and determining any disciplinary action if necessary.

3.5.8 Employee Reporting Methods

If a Sun Metro employee is involved in a near miss or determines something they deem to be a hazard, Sun Metro and its contractors ask for their help in reporting the event so we all may learn the lessons from it and perhaps prevent a collision or injury from occurring in the future.

- Near miss: An event you witnessed where no harm was caused, but there was the potential to cause injury or ill health; a dangerous occurrence.
- Hazard: Anything that may cause harm in the near future.

If an employee is involved in a near miss or determines something they deem to be a hazard, we ask for their help in reporting the event so we all may learn the lessons from it and perhaps prevent a collision or injury from occurring in the future.

If the safety or security hazard requires immediate attention, dispatch is notified immediately. If immediate attention is not required, the employee is encouraged to submit the information to management by the end of their workday. Our managers then initiate conversations with employees about their observations of both safe and unsafe behaviors.

The employee's contribution to the cause of the injury or collision is considered in disciplinary action, up to and including termination. If, after analysis, it has been determined that the safety event resulted from an overt decision, disciplinary action is indicated. If not, then the appropriate counseling and/or training is indicated.

The following methods will be used by Sun Metro to allow employees to report hazards or near misses. The methods are:

1. **Reporting boxes:** Using a Near/Hazard Notification form, the employee can fill out the form and deposit it in the reporting boxes that will be located at strategic locations on Sun Metro facilities. The locations will be selected in a way that the employees feel comfortable using this method. Each mode will develop a Standard Operating Procedure.
2. **Open-door policy:** Each safety manager, CSO/SMS Executive, and Accountable Executive has an open-door policy where the employee is encouraged to contact their corresponding manager to report any hazard or safety situation in their work area.

Refer to section 6.2 Safety Communication for more details on Sun Metro's Communication process.

3. **Hazard Reporting QR Code**



Safety Management System (SMS)

What is my role in our SMS?

- Work safely and wear PPE
- Be compliant with procedures and regulations
- Report safety hazards, concerns, or suggestions

What can I report?

- Hazards or potential hazards
- Accident and/or incidents
- Possible solutions and safety improvements
- Close calls and/or near misses

Please email your concerns to
sm-hazards@elpasotexas.gov
or use the QR code on the back.

Safety Reporting Options:

- Notify your Supervisor/Lead or local
- Safety Representative
- Email sm-hazards@elpasotexas.gov
- Formally submit a confidential report

Personal Safety Accountabilities:

- I am accountable for my own safety and file safety of those around me
- I follow procedures, wear PPE, and promptly report safety hazards
- I must report injuries and damages
- My goal: **BE SAFE AT WORK AND AT HOME**

Unacceptable Workplace Behaviors:

- Willful safety violations
- Reckless and negligent acts
- Criminal activities
- Alcohol or drug use

Point your camera at the QR code.
Wait for code to scan,
and then open.



4. Promotional E-mail for Reporting Hazards



3.6 Safety Management Policy Communication

Each safety manager is responsible for communicating the safety policies established in this PTASP to their employees. The Safety Manager must communicate the safety policy within 30 days after the PTASP has been approved by the Mass Transit Board.

The Safety Manager can use any or all of the methods listed below to communicate the Safety Policy:

- **E-mail** – sm-hazards@elpasotexas.com: A safety hazard reporting email provides a streamlined, confidential, and accountable channel for reporting potential hazards. It facilitates efficient communication, enables timely responses, ensures documentation, and contributes significantly to the overall effectiveness of a Safety Management System.
- **Hazard Reporting QR Code**: Providing a QR Code address specifically dedicated to safety hazard reporting makes it convenient for employees to report safety concerns. It offers a simple, direct, and accessible way to communicate potential hazards.
- **Safety Bulletins**: Safety bulletins are essential components of a Safety Management System. They ensure consistent communication, promote awareness, facilitate rapid responses to emerging risks, enhance employee education, and contribute significantly to the development of a robust safety culture within an organization.
- **Toolbox meetings**: Regular safety Toolbox Meetings demonstrate the organization's commitment to safety. A proactive approach to communication creates a positive safety culture, encouraging employees to actively participate in maintaining a safe work environment.
- **General notices**: The General notices can swiftly address emerging safety concerns or industry updates. Rapid dissemination of this information allows the organization to respond promptly, implementing necessary changes or precautions to mitigate risks.
- **Formal classroom training**: Training can serve as an educational tool, providing employees with valuable information on new safety equipment, procedures, or regulations. Regular training through formal classroom training ensures that employees are continuously learning and staying up-to-date with industry standards.

Specific to Rail, the additional methods are also used to communicate the Safety Policy:

- A USB drive will be issued to all of the Streetcar employees with all the necessary information, including the SOPs, SMP's PTASP.
- A monitor dedicated to the safety department, displaying any relevant Safety Management Policies

These additional methods will ensure that the Safety Management Policies are readily accessible to everyone in the organization.

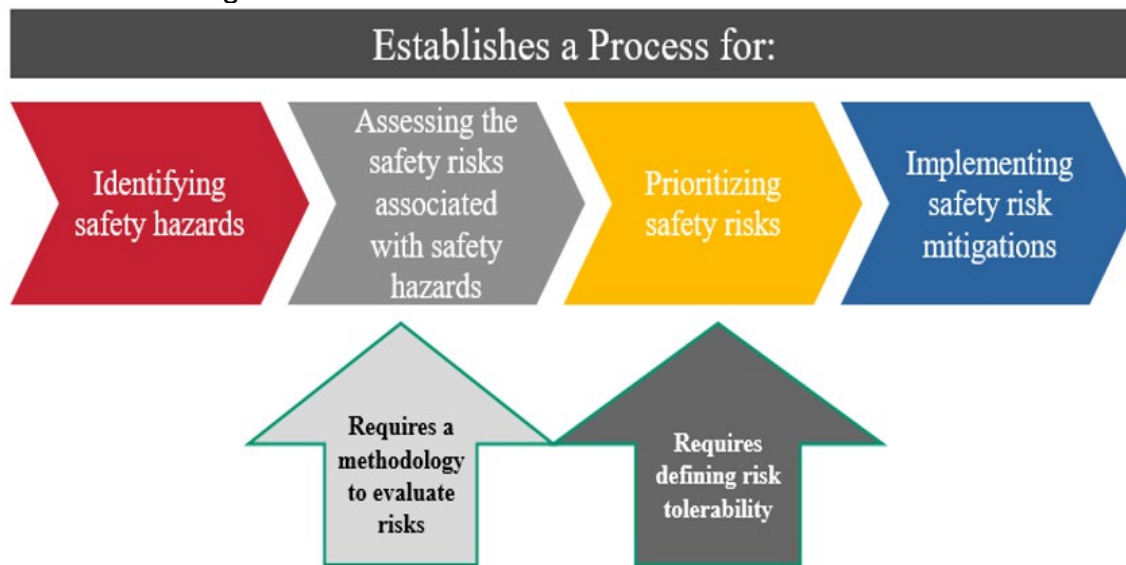
The safety manager is responsible for documenting in writing which method was used and that all employees were formally notified and acknowledged that they received the information.

4 Safety Risk Management (49 CFR 673.25)

4.1 Safety Risk Management Overview

The objective of this section is to establish a process to manage hazardous conditions that exist across **all transit modes** operated by Sun Metro. Sun Metro's Safety Risk Management (SRM) process evaluates hazards associated with roadway work and track access activities. Under 49 CFR 673.25 and 49 CFR 671. The process will identify hazards, assess the hazards, develop corrective actions to mitigate or eliminate the hazards, and assess the success of the corrective actions in eliminating or minimizing to an acceptable risk status through the mitigations. Refer to Sun Metro SOP 600.1 Hazard Management and Assessment.

Refer to the diagram below:



Sun Metro defines a hazard as 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 the public transportation system; or damage to the environment.

The Chief Safety Officer or SMS Executive and the Safety Manager of each mode are directly responsible for the implementation and ongoing management of Sun Metro's Hazard Management process. This includes:

1. Developing, updating, and auditing the program
2. Training all designated Sun Metro employees and contractors on the hazard management process
3. Documenting and tracking all identified hazards to resolution.

The hazard resolution process is from 'cradle to grave' and can be applied throughout the 5 phases of the system life cycle.

1. Planning
2. Design
3. Construction
4. Operations

5. Decommissioning

Hazard analysis attempts to determine the set of primary events in the hazard generation process. Upon identification of these events, Sun Metro will undertake measures to mitigate, control, or eliminate the generation of hazards in ways that can reduce their risk to an acceptable level. Hazard resolution is the corrective action taken in response to the hazard identification and assessment process, but time and resource restrictions may determine the level of resolution that can be accomplished.

The following are actions for hazard resolution:

1. Eliminate the hazard, if possible
2. Implement training, procedural strategies, or technology approaches, as appropriate, to reduce the hazard.
3. Provide training to educate the workforce on possible hazards
4. If the hazard cannot be eliminated, reduce exposure to it
5. Monitor the Hazard mitigation to determine if the risk has been managed at an acceptable level so that it does not recur."

4.2 Safety Hazard Identification

Hazard identification encompasses a set of methodologies that first search throughout the system for anything with the potential to do harm. Identification of hazards is the responsibility of all divisions and is the key to system safety. Identified hazards are analyzed for severity, occurrence frequency, and cost feasibility of remedial action required to eliminate or reduce the hazard to the lowest practical level. The Safety Manager of each mode shall review all hazards identified and log them into the Hazard Tracking Log.

Hazards can be identified in several ways, such as:

1. Design Review
2. A, System Reliability, and Failure Reports
3. Ride Checks and Proficiency Checks
4. System Inspections, Audits, and Regulatory Inspections
5. Customer, Contractor, and Employee Complaints
6. Safety Committee
7. Transit Industry Experience
8. Federal Transit Administration
9. Texas Department of Transportation (TxDOT-SSOA)

Identify roadway worker hazards including:

- Loss of redundant protections
- Failure of RWIC communication
- Lone worker violations
- OCC authorization errors
- Roadway vehicles or trains entering work zones
- Nighttime visibility limitations
- PPE failures or improper roadway markings
- Work zone encroachment by the public

Sun Metro will use a hazard identification and analysis process before purchasing and accepting new equipment and modifications of existing facilities, systems, or rolling stock, and infrastructure elements.

By the 15th of the following month, EPSC/Sun Metro is required by TxDOT to submit a consolidated hazard log or equivalent documentation for hazards discovered during the previous month and hazards that remain open. The log must contain hazards encountered by all departments of the agency, and any source, including but not limited to, transit worker reporting program, safety officer observations, internal reviews, contractor reviews, analyses, and investigations, hazards identified from SSO personnel, passenger complaints, after-action reviews of safety events, and safety concerns identified through safety data reviews.

4.3 Safety Risk Assessment

Hazard Risk Assessment is a quantitative calculation based largely on subjective judgments used to determine the risk associated with each hazard and thus the urgency for implementing corrective measures to eliminate or reduce risk to a level of acceptability. Risk Assessment is comprised of evaluating hazard severity (categorizing the hazard) and evaluating hazard probability.

The factors considered in this analysis include system safety, schedule, and the impact on the public's perception of safety on the system in the community where the Streetcars operate.

4.3.1 Hazard Analysis

Analysis of a hazard is based on both the probability of occurrence and the severity of an event. Hazards with the greatest potential to cause serious injury are given the highest priority for immediate resolution. Hazard analysis also attempts to reduce the severity of safety events by introducing protective devices and equipment, procedures, and/or forms, or system modifications that reduce the amount of human and property damage in a safety event.

While identifying every hazard is virtually impossible, there are two methods for orderly identification of hazards: inductive and deductive analysis.

- The inductive hazard identification process consists of an analysis of system components to identify their respective failure modes and the effects they may have on the total system. This process assumes the failure of single elements or events and, through analysis, determines the potential consequential effects on the system or subsystem.
- The deductive hazard identification process involves defining an undesired effect (e.g., collision, fire) and then deducing the possible conditions or system component faults (or combinations of them) that are necessary to cause the undesired effect.

Analyze roadway work risks including:

- Worker exposure to moving trains
- Adequacy of sweep procedures

- Redundant protection integrity
- Proximity detection and communication reliability

The CSO and the Safety Manager of each mode will continually evaluate the transit operation using the methods described above to identify new hazards. This will be documented as described in this document.

For existing infrastructure elements, vehicles, procedures/processes, Sun Metro should consider using audits – either ad hoc or structured, based on identified safety issues, to identify existing hazards and hazard potentials.

The Chief Safety Officer or SMS Executive and the Safety Manager of each mode will be charged with performing the hazard analysis for that operation.

4.3.2 Hazard Severity

Hazard severity is a subjective determination. As data is accumulated over time, an objective determination applicable specifically to Sun Metro can be derived. The determination reflects a credible mishap that could be anticipated to result from human error, procedural deficiencies, design inadequacies, component failure, or malfunction. Hazard Severity at Sun Metro is based on the U.S. Department of Defense Military Standard for Systems Engineering (MIL-STD-882-E) as follows:

- Category 1, Catastrophic – Death, system loss, or severe disruption of service system-wide.
- Category 2, Critical – Severe injury, severe occupational illness, major system damage, or major system-wide disruption of service.
- Category 3, Marginal – Minor injury, minor occupational illness, minor system damage, or minor system disruption of service.
- Category 4, Negligible – Less than a minor injury, occupational illness, system damage, or less than minor system disruption of service.

The categorization of hazards is consistent with risk-based criteria for severity; it reflects the principle that not all hazards pose an equal amount of risk to personal or system safety.

If the Mode Safety Manager and/or the CSO / SMS Executive identify any Category 1 Catastrophic and Category 2 Critical hazards, specifically hazards 1A, 1B, 1C, 2A & 2B on the streetcar system, the TxDOT-SSOA will be immediately notified using “TxDOT Industry Safe” software.

The OHA and/or PHA for all transit modes in Sun Metro will be periodically updated to ensure the hazards have been mitigated, reduced, or controlled to acceptable levels. The Safety Manager of each transit mode is responsible for updating the OHA and/or PHA.

4.3.3 Hazard Probability

The probability of an event or hazard occurring may be defined as a ratio of the number of times a specific event occurs to the total number of trials in which this event may occur during the planned life expectancy of a system. Generally, hazard probability is described qualitatively in potential occurrences per unit of time, miles, trips/runs, or passengers carried. The table below identifies the probability thresholds used by the Sun Metro. A hazard probability may be derived from the analysis of transit system operating experience, evaluation of Sun Metro safety data, or historical safety data from other passenger rail systems.

Hazard Assessment Probability Levels

Hazard Probability	Probability Levels
A = Frequent	Likely to occur frequently to an individual item. Continuously experienced in the system. MTBE* is less than 1000 operating hours
B = Probable	It may occur several times in the life of an item. It may occur frequently in the system. MTBE is equal to or greater than 1000 operating hours and less than 100,000 operating hours
C = Occasional	Likely to occur sometime in the life of an item. It may occur several times in the system. MTBE is equal to or greater than 100,000 operating hours and less than 1,000,000 operating hours
D = Remote	Unlikely, but possible to occur in the lifetime of an item. Unlikely, but can be expected to occur at some time in the system. MTBE has greater than 1,000,000 operating hours and less than 100,000,000 operating hours
E = Improbable	So, unlikely to occur, it can be assumed that occurrence may not be experienced. Unlikely, but possible to occur in the system. MTBE is greater than 100,000,000 operating hours
F = Eliminated	Incapable of occurrence. This category is used when potential hazards are identified and later eliminated

* MTBE = Mean Time between Events

The Risk Assessment Process is used to prioritize hazardous conditions and focus available resources on the most serious hazards requiring immediate resolution. Sun Metro will use MIL-STD-882-E DOD Standard Practice for System Safety dated May 11, 2012, or the most current version, to assess the level of risk for each identified hazard to determine what action(s) must be taken to correct or document the hazard risk. This risk assessment system is incorporated into the formal System Safety analysis, which enables Sun Metro decision-makers to understand the amount of risk involved in accepting the hazard in relation to the cost (schedule, cost, operations) to reduce the hazard to an acceptable level.

The Risk Assessment Matrix informs the Risk Assessment Index based on potential severity and probability. The criteria for defining further actions are based on that index. Follow-up actions resulting from the Risk Assessment are as follows:

- ✓ **Unacceptable:** The hazard must be mitigated in the most expedient manner possible before normal service may resume. Interim corrective action may be required to mitigate the hazard to an acceptable level while the permanent resolution is in development.
- ✓ **Undesirable:** A hazard at this level of risk must be mitigated unless a documented decision to manage the hazard until resources are available for full mitigation is issued by executive management and forwarded to Sun Metro CSO for review and approval/disapproval.
- ✓ **Acceptable with Review:** The CSO must determine if the hazard is adequately controlled or mitigated as is.
- ✓ **Acceptable without Review:** The hazard does not need to be reviewed by management and does not require further mitigation or control.

Risk Assessment Matrix

Safety Risk Assessment Matrix					
MIL-STD-882-E		Severity			
		Catastrophic 1	Critical 2	Marginal 3	Negligible 4
Probability	A - Frequent	1A	2A	3A	4A
	B - Probable	1B	2B	3B	4B
	C - Occasional	1C	2C	3C	4C
	D - Remote	1D	2D	3D	4D
	E – Improbable	1E	2E	3E	4E
	F - Eliminated	1F	2F	3F	4F

Risk Assessment Index

1A, 1B, 1C, 2A, 2B	HIGH	Unacceptable
1D, 2C, 3A, 3B	SERIOUS	Undesirable, with a management decision required
1E, 2D, 2E, 3C, 3E, 3D, 4A, 4B	MEDIUM	Acceptable with review by management
4C, 4D, 4E	LOW	Acceptable without review
1F, 2F, 3F, 4F	NONE	Incapable of occurrence. This category is used when potential hazards are identified and later eliminated

Categories

Category	Description	Description
1	Catastrophic	Death, system loss, or severe environmental damage
2	Critical	Severe injury, severe occupational illness, major system or environmental damage
3	Marginal	Minor injury, minor occupational illness, or minor system or environmental damage
4	Negligible	Less than minor injury, occupational illness, or less than minor system or environmental damage

Probability

Level	Description	Specific Individual Item	Fleet Inventory
A	Frequent	Likely to occur frequently	Continuously experienced
B	Probable	Likely to occur several time in the life of an item	Will occur frequently
C	Occasional	Likely to occur sometime in the life of an item	Will occur several times
D	Remote	Unlikely but possible to occur in the life of an item	Unlikely but can reasonably be expected to occur
E	Improbable	So unlikely, it can be assumed occurrence may not be experienced	Unlikely to occur, but possible
F	Eliminated	Completely removed from consideration	Removed from consideration

4.4 Safety Risk Mitigation

The mitigation of hazards utilizes the results of the Risk Assessment Process. The objectives of the hazard resolution process are to:

1. Identify areas where hazard resolution requires a change in the system design, installation of safety devices, or development of special procedures.
2. Verify hazards involving interfaces between two or more systems have been resolved; and
3. Verifying the resolution of a hazard in one system does not create a new hazard in another system.

Mitigate risks by implementing controls including:

- Required positive protection (exclusive track occupancy, RWIC control, flags, derails, TIMS, OCC protection)
- Pre-job Job Safety Briefings
- Risk-based track access scheduling (daytime vs. non-revenue hours)
- Additional shielding, cones, markers, and PPE
- Specialized training for high-risk tasks

All roadway worker hazards must be included in the Sun Metro hazard log and reviewed annually.

Sun Metro uses the following methodology to ensure system safety objectives are met by eliminating or controlling hazards. These controls are implemented throughout design, construction, procurement, and operations:

1. Design out hazards or design to minimize hazard severity. To the extent permitted by cost and practicality, identified hazards are eliminated or controlled by the design of equipment, systems, and facilities.
2. Develop mitigating provisions for hazards that cannot reasonably be eliminated or controlled through design that is controlled to an acceptable level through the use of fixed, automatic, or other protective safety design features or devices. Provisions are made for the periodic performance of functional checks of safety devices and training for employees to meet system safety objectives.
3. When design, training, and safety devices cannot reasonably or effectively eliminate or control an identified hazard, safety warning devices are used (to the extent practicable) to alert persons to the hazard.
4. Where it is impossible to reasonably eliminate or adequately control a hazard through design or the use of safety and warning devices, procedures, and training are used to control the hazard. Precautionary notations are standardized for use by all persons involved, and safety-critical issues require the certification of authorized personnel.

The Initial Risk Index defines the magnitude of any specific hazard item without the implementation of design, construction, procurement, or operational measures to control or mitigate the risk. The Safety Manager by mode will identify sets of proposed mitigation actions to eliminate or control each identified risk and evaluate the Residual Risk Index. Based on those mitigating actions, to assess the potential effectiveness and inform the Sun Metro Associate Director of Streetcar Operations, a determination of whether the hazard is adequately controlled or mitigated will be made.

4.5 Roadway Worker Protection

El Paso Streetcar (EPSC) has implemented a comprehensive **Roadway Worker Protection (RWP) Program** designed to protect all personnel who perform inspection, construction, maintenance, or other work activities on or near the streetcar guideway. The **EPSC Roadway Worker Protection Manual** establishes the required procedures, minimum safety standards, and controls needed to prevent unintended train movements, worker strikes, and other roadway-related hazards.

The manual defines the required **redundant protections**, communication protocols, and job-site controls necessary to ensure roadway workers can perform their duties safely. These protections include, but are not limited to:

- Establishing **exclusive track occupancy** or other forms of positive protection
- Assignment of a qualified **Roadway Worker-in-Charge (RWIC)** responsible for on-site safety
- Mandatory **Job Safety Briefings** before work begins and upon any job-site change
- Use of **lone worker protections**, proximity awareness, and continuous communication
- Implementation of **Good Faith Challenge** procedures when any worker identifies an unsafe condition
- Use of appropriate **personal protective equipment (PPE)** and roadway safety devices
- Coordination with the Operations Control Center (OCC) for track access, protection setup, and job completion
- Compliance with training, qualification, and requalification requirements defined in the RWP Manual

All roadway workers, supervisors, contractors, and visiting personnel must adhere to the policies, procedures, and responsibilities established in the **EPSC Roadway Worker Protection Manual** when working within the streetcar operating environment.

Track Access Training for all employees and contractors performing work in roadway or trackway environments will be conducted in accordance with the Roadworkers Protection Manual (RPM). The RPM outlines the required training topics, including hazard

identification, proper use of personal protective equipment, and emergency response procedures.

5. Safety Assurance (49 CFR 673.27)

5.1 Safety Assurance Process Overview

This section describes the different processes used to track the implementation of Sun Metro's Safety Management System.

Sun Metro evaluates roadway worker safety using:

- **RWP compliance audits**
- **Field observations of RWICs and crews**
- **Track access protection verification**
- **Redundant protection performance reviews**
- **Near-miss and incident trend analysis**
- **Periodic review of OCC authorization logs**
- **Annual RWP Program audit** (required by 49 CFR 671.45)

Corrective actions related to RWP deficiencies must be tracked in the Safety Assurance Corrective Action Log and reviewed monthly.

Sun Metro understands that hazard management is not only the management of new hazards but also the management of mitigating hazards. Sun Metro will evaluate the mitigations already implemented to verify their effectiveness.

This table is a simplified explanation of Sun Metro's Safety Assurance section:

Safety Assurance Decision Table	If yes, then...
Procedures, Monitoring, and Measurement	
Inadequate compliance?	Address non-compliance
Insufficient?	Evaluate hazards through the Risk Management Process.
Safety Risk Mitigation, Monitoring, and Measurement	
Ineffective?	Evaluate hazards through the Risk Management Process.
Inappropriate?	Identify new mitigation under the Risk Management Process.
Not implemented?	Address non-compliance

Safety Assurance Decision Table	If yes, then...
Safety Event Investigations	
Causal factors identified?	Evaluate hazards through the Risk Management Process.
Information collected?	Use to monitor and measure through other Safety Assurance processes.
Internal Reporting Programs, Monitoring, and Measurement	
Safety concerns identified?	Evaluate hazards through the Risk Management Process.
Information collected?	Use to monitor and measure through other SA processes.

5.2. Monitoring Roadworkers Safety

The Safety Department will evaluate compliance with the safety procedures outlined in the RPM through routine audits, inspections, and incident reviews. Feedback from these activities will be used to update and improve the policies detailed in the RPM and this PTASP

5.3. Safety Performance Monitoring and Measurement Section

5.3.1. Process to monitor compliance with operation and maintenance procedures

This section describes how Sun Metro will monitor:

- Compliance with and sufficiency of operations and maintenance procedures.
- Operations to identify safety risk mitigations that may be:
 - Ineffective could re-analyze the hazard(s) and consequence(s) the mitigation was intended to address through Risk Management.
 - Inappropriate, could identify new mitigation options.
 - The mitigation may not be feasible.
 - Not implemented as intended, could consider alternative mitigations or alternative approaches to implementation.

Sun Metro Key Staff will assess the information gathered using the processes described in this section and evaluate how to address it.

5.3.1.1. Facilities and Equipment Inspections

Please reference the Streetcar Operations Maintenance Plan (OMP) for more detailed information on the topics presented.

Facility Inspections

Periodic safety inspections are performed on all Sun Metro facilities to detect and resolve hazards in order to effectively safeguard employees, visitors, and passengers. The Safety Manager of the specific mode and/or maintenance staff will perform safety inspections of the Sun Metro facilities.

The Safety Manager of the specific mode is responsible for ensuring hazards are addressed and corrective actions are captured and logged in the consolidated Hazard Tracking log of that mode. The Safety Manager of the specific mode must complete at a minimum one quarterly safety inspection in the facility under their supervision. The inspection will include, but is not limited to, housekeeping, fire extinguishers, and guard rails/stair rails in the proper place.

For the Track Sweep on El Paso Streetcar, the maintenance staff will be properly trained to perform the track sweep inspection.

Note: Sun Metro does not fall under OSHA requirements but rather the City's own Safety Policy.

Equipment Inspections

- Inspections of facility equipment are made in accordance with appropriate maintenance manuals and procedures. The Safety Manager of the specific mode works with the Mode Maintenance personnel and Sun Metro Facilities to ensure equipment and facilities are maintained at an optimum level of safety. Hazards identified during inspections are entered into the Hazard Tracking Log of the mode as appropriate and tracked until closure is achieved.

5.3.1.2. Maintenance Inspections

Each mode is responsible for developing and implementing a Maintenance Inspection program. This program will be implemented by the Safety Manager of the specific mode with the support of Sun Metro CSO and the City of El Paso Office of Risk Management and Safety.

Each Sun Metro facility inspection report is sent to the responsible party to create the appropriate work orders. It identifies specific areas and targets specific recommendations for corrective action. Identified unacceptable hazards are reported to the CSO. Hazards identified during these inspections are entered into the Hazard Tracking Log of the specific mode as appropriate.

Work Orders are generated in Fleet Net software for defects identified during Streetcar Maintenance, Sun Metro Facilities Management, and EPSC Systems Maintenance inspections. Fleet Net is the software used by Sun Metro to generate, track, and close all work orders generated by the appropriate departments. Hazards identified during these inspections are entered into the Hazard Tracking Log as appropriate and evaluated by the Safety Manager of the mode. Mitigation of Hazards is tracked to closure using the mode Hazard Tracking Log.

Checklists for Facilities are included in the Facility Maintenance Plan, Vehicle Maintenance Plan, or other specific SOP. The checklists are created by the Mode Maintenance Department with the assistance of the Safety and Operations of the mode.

At random, the Safety Manager of the mode and/or Chief Safety Officer or SMS Executive will perform inspections to verify that previous inspections and maintenance were performed in accordance with OEM recommendations. If areas of improvement are found, the Facility and Maintenance department will be required to present CAPs to the CSO. Those CAPs will be included in the CAP Log for tracking and closure.

5.3.2. Safety Data

The Chief Safety Officer or SMS Executive & the Safety Manager of the mode will monitor the safety performance of the various Sun Metro operations. Safety Events, injuries, and other safety data are collected throughout the division and analyzed to determine trends within the organization. The safety data collected is analyzed to determine if safety performance meets established safety goals outlined annually.

The safety event data also helps to identify service areas that generate a higher percentage of events or potential for higher event rates. Safety data collected includes injuries to passengers, Sun Metro personnel, and the public; hazardous equipment failures; unacceptable hazardous conditions; vandalism and security hazards; and rules and procedures violations. The Safety and Security Division analyzes safety-related data to implement corrective action to assist in preventing or mitigating the recurrence of hazards.

Data Acquisition

Information regarding Safety Events and hazardous conditions of Sun Metro is obtained from several different reporting sources.

These include, but are not limited to, the following reports or logs:

- a. Safety Event/Injury Reports
- b. Blocking log
- c. Audits
- d. Inspections
- e. Ride checks
- f. Unusual Situations Reports
- g. Event Reports
- h. Transit Master Operation Event Report
- i. Employee/Occupational Injury reports
- j. National Transit Database (NTD) Safety and Security reporting module

Data Analysis

Hazard data is used to identify trends. Trends are then further analyzed and/or investigated by the Chief Safety Officer or SMS Executive and/or Safety Manager of the mode to determine causal factors. Interviews with personnel in the affected division(s) may also be conducted. The various safety teams identify hazards, areas susceptible to

events, traffic problems, and other critical factors to develop corrective actions for hazards.

Reports

The Safety Manager of the mode analyzes the data from reports, event investigations, safety committees, field inspections, Police Reports, and Risk Management. The Safety Manager of the mode also uses the data acquisition and analysis process to identify system trends and to monitor safety and security program performance. The Safety Manager of the mode provides monthly safety program performance reports to CSO.

Currently, safety performance reports (in conformance with those submitted to the National Transit Database - NTD) are submitted to FTA on a monthly and annual basis. The reports contain injury data regarding passengers, Sun Metro personnel, and customer/public Safety Events.

Sun Metro uses this report to establish safety performance goals and objectives for each coming year.

5.4. Process to conduct investigations of safety events to identify causal factors

Each mode is responsible for developing a specific event investigation procedure. The safety manager of each mode will develop and/or update their event investigation procedure. Each procedure will be submitted to Sun Metro CSO and AE for review and approval.

Each safety event is investigated as specified in the latest version of the Sun Metro Event Investigation Procedures. The Procedures will comply with 49 CFR Parts 672, 673 & 674, the State Rail Safety Oversight Rule (for streetcar) for rail safety events, and 49 CFR Part 1582 U.S. Department of Homeland Security Rule affecting transit systems. For Streetcar, please refer to SOP 700.1 Revision 1 as approved by TxDOT for details on safety event investigation.

All Sun Metro employees and contractors are expected to comply with Sun Metro safety event reporting procedures and use the forms prescribed. Roles, responsibilities, and event reporting thresholds are outlined in the procedures, including event notification, reporting, and investigation throughout the organization. The level of investigation required is dependent on the seriousness of the event.

The event investigation procedures will be revised **annually or any time** there is a change in the FTA or TxDOT regulations and requirements. In addition to the event investigation procedure, Sun Metro has SOPs to address event notification & event management.

5.4.1. Event Notification

All Safety Managers are required to develop an event notification procedure specific to their mode. As a minimum, the following notifications must be made:

- Internal Notification: Develop a process to notify Sun Metro Management in case of safety events that may require upper management notification.
- External Notification: At a minimum, the following external agencies will require notification within 2 hrs., as applicable:
 - Notification to FTA will be submitted by TOC-1@dot.gov / **202-366-1863**
 - The notification will be submitted using the TxDOT – SSO Tracker for initial Major Event Notification (for Streetcar within 2 hrs.).
 - The National Transportation Safety Board will be notified by calling the National Response Center at 1-800-424-0201

5.4.2. Event Investigation Methods

The following investigative methods will be included, but are not inclusive of the investigation process:

- On-site inspection of the event scene.
- Review (if necessary) of:
 - Maintenance, operations, or employee training records and
 - The results of post-accident drug and alcohol tests
 - Camera footage, audio recordings, and other data downloaded from electronic devices and recorders
- Collection of all pertinent facts and evidence available, or near the scene of the safety event.
- Conduct interviews of employees involved or other witnesses at the site when appropriate;
- Observe employees in the performance of work
- An assemblage of all pertinent reports, data, and records associated with the safety event.
- Conduct follow-up interviews and/or re-enactments to complete the event investigation
- Perform analysis as required to determine the causative factor(s) for each safety event.

5.4.3. Photographs

All accident investigation scenes must be photographed as soon as possible from a panoramic view, preferably before the accident scene is disturbed. Scene photographs should be taken using a '4-point compass' method. The entire scene should be photographed from multiple vantage points. The photographer should attempt to provide sufficient depth of field to show the relative positioning of objects and subjects for later comparison with diagrams.

Arrange to have specific objects or subjects photographed as soon as possible from both normal periphery and close-up views, preferably, **before the accident scene is disturbed**. These photographs should attempt to include, at a minimum:

- a. For each vehicle involved, the exterior has four sides, including a number
- b. Each vehicle involved, an interior compartment
- c. Each vehicle involved, operating the control compartment

- d. Resting position of wheels on the track, including evidence of sanding
- e. All visible points of vehicle damage
- f. Evidence of wheel marks on the rail
- g. All visible points of infrastructure damage
- h. Any visibly evident contributing obstructions, objects, or conditions
- i. Position of casualties, if stationary
- j. Any other subject that appears out of the ordinary

5.4.4. Reports

It will be the responsibility of each Safety Manager to prepare an event report. All Event Investigation Reports will be reviewed and approved by the Mass Transit Chief Safety Officer, SMS Executive, or designee.

The Event Investigation Reports must compile the safety event information and findings evaluated during the investigation process, and will include the recommendations to prevent recurrence with the corrective action plan.

For Streetcar, the report will be prepared using TxDOT's Industry Safety software. Refer to Streetcar SOP 700.1 *Event Investigation* for details.

5.3.5 Allegations of Noncompliance

Sun Metro's acknowledgement of sec 1.3 of the program standards, TxDOT has primary responsibility for the investigation of any allegations of noncompliance with an RTA's PTASP. TxDOT will use the following criteria to evaluate allegations to determine whether they constitute noncompliance:

- The RTA takes action that directly violates published content within its PTASP.
- An RTA transit worker takes action that directly violates published content within its PTASP.

Allegations reported via electronically and by telephone must adhere to the following guidelines:

1. Provide your information to the responding SSO Program Manager
2. Persons notifying TxDOT of allegations of non-compliance may do so anonymously, but are encouraged to provide contact information in case TxDOT needs additional information to investigate the allegation.
3. Provide sufficient detail for TxDOT staff to determine whether TxDOT SSO has jurisdiction over the allegation, as well as to determine the pertinent facts of the allegation.

The TxDOT SSO Program Manager will acknowledge receiving the allegation, manage the investigation of the allegation, and submit a report and findings of the investigation to the TxDOT Public Transportation Division leadership within 30 calendar days. Extensions may be granted for valid investigation purposes by the division leadership.

TxDOT may investigate allegations or refer them to the affected agency's Chief Safety Officer (CSO) for investigation. In either case, TxDOT will ensure the completion of a thorough, impartial investigation and investigation report within 30 calendar days.

If TxDOT determines the allegation does not constitute noncompliance with the RTA's PTASP. But rather than an issue the RTA can address through its safety risk management process, TxDOT will notify the complainant accordingly.

5.5. Continuous Improvement Section

5.5.1. Internal Safety Audit

The purpose of internal system safety audits is to perform an official evaluation of accomplishments, problems, and trends related to total Sun Metro safety and to evaluate the effectiveness of the implementation of the PTASP.

The SMS Executive/ CSO is responsible for the direction of the safety reviews and audits of Sun Metro divisions and contractors to determine performance related to the System Safety goals and objectives. The audits will be performed by the City of El Paso Office of Risk Management.

All Sun Metro divisions and contractors are subject to safety audits. The critical nature of certain operations requires rigorous development of reviews and audits. These include training, maintenance, and operations activities. Both periodic and no-notice inspections are undertaken to address all aspects of the activity, including documentation, practices, and compliance with the PTASP, Sun Metro policies, and other requirements.

The CSO reviews training, practices, and procedures to correct deficiencies identified while conducting audits or other safety activities, including inspections and emergency drills.

If a federal or state regulation is violated, TXDOT may initiate administrative action, starting with a written notification to the RTA. This notification will detail the violations, required actions, and the process for administrative review if the Sun Metro/ EPSC disagrees.

Sun Metro/EPSC must submit documentation to TXDOT to show compliance or request an administrative review. TXDOT will issue a final decision within 60 calendar days of receiving the appeal. Failure to comply will result in escalated enforcement, which may include rescinding approval of Sun Metro/EPSC's safety plan, issuing an emergency order for public safety, or seeking a temporary injunction. For more information on administrative actions, review the Texas Administrative Code, Chapter 7, Subchapter E - Rail Fixed Guideway System State Safety Oversight Program.

5.5.1.1. Purpose and Scope

The purpose of internal safety audits is to confirm that all safety elements are in place and that assigned safety tasks and activities are being accomplished. This provides an

additional means of documentation for senior management to verify how well each division is fulfilling its safety-related goals and objectives as required in the PTASP.

5.5.1.2. Safety Audit Process

The Chief Safety Officer or SMS Executive, with the help of the Office of Risk Management of the City of El Paso, is responsible for the management of the Internal Safety Audit Program. All Sun Metro divisions are required to cooperate fully with Safety and Security personnel. Executive and senior managers ensure their divisions participate fully in the safety audit process. The Office of Risk Management of the City of El Paso is responsible for submitting to TxDOT the auditing checklist for Streetcar, a minimum of 30 days in advance of a scheduled safety audit.

5.5.1.3. Integrity of Review Process

To maintain the integrity of the review process, an audit team is used to conduct safety audits. The Safety Manager of the mode does not perform audits/reviews of those functions and elements for which they are directly responsible for implementation. These elements are audited by the Chief Safety Officer or SMS Executive and Office of Risk Management of the City of El Paso, an outside contractor, or an independent member of the audit team. No team member shall audit a function or activity for which they are responsible.

5.5.1.4. Cycle/Schedule

Over a three-year period, all the elements of the PTASP must be audited at least once. Sun Metro's Internal Safety Audit Process is intended to be an ongoing, continuous safety review process. The CSO/SMS Executive will provide and submit annually a comprehensive Internal Safety Audit schedule detailing when it will audit these elements over the three-year period.

The annual audit schedule must be developed, reviewed, maintained, and updated to ensure all elements of the PTASP are reviewed during the audit cycle.

Tentative Sun Metro Audit Schedule 2026

2026	Sun Metro - Lift	Sun Metro - Streetcar	Sun Metro - Bus
60-Day Notice to Sun Metro	Tuesday, April 7, 2026	Monday, July 6, 2026	Monday, May 11, 2026
30-Day Notice to Sun Metro	Thursday, May 7, 2026	Thursday, August 6, 2026	Wednesday, June 10, 2026
Audit Commencement	Monday, June 8, 2026	Monday, September 7, 2026	Monday, July 6, 2026
Audit Conclusion	Friday, June 12, 2026	Friday, September 11, 2026	Friday, July 10, 2026
Sun Metro Responses	Monday, July 13, 2026	Monday, October 12, 2026	Monday, August 10, 2026
Finalized Audit Report	Thursday, August 13, 2026	Thursday, November 12, 2026	Thursday, September 10, 2026

The Chief Safety Officer or SMS Executive and/or Safety Manager notifies the division/organization and TxDOT (for streetcar) a minimum of 60 days in advance of a scheduled safety audit.

5.5.1.5. Checklists and Performance of Safety Audits

Audit checklists are developed in advance for each transit mode by the City of El Paso Office of Risk Management. The checklists include the elements on which the department will be audited. Checklists are prepared during the review of the PTASP section, documents referenced in previous audits, and corrective actions.

The Sun Metro's auditing checklists must be submitted by the City of El Paso Office of Risk Management to TxDOT for review and approval. This review package shall be submitted in time to receive TxDOT approval no less than 60 days prior to conducting the ISR. The Audit checklists are then provided to the organization being audited as soon as possible after receiving TxDOT's approved checklist(s).

The review package shall include the following information:

- Identify the departments, employees, and contractors responsible for scheduling, managing and conducting the annual review;
- PTSCTP Certification for personnel conducting the internal safety review;
- Identify the departments and functions subject to review.
- At a minimum, the annual approval package shall identify the RTA personnel participating in the review, contact information, interview schedules, and a listing of the on-site audit locations.
- Develop templates, checklists, and procedures for conducting the ISR. These materials shall include sufficient criteria to determine if all audited elements are implemented as intended.

Pre-audit and post-audit conferences are held by the audit team with the entity being audited. The safety audits are comprised of record reviews, interviews, field observations, and inspections and measurements to verify the accuracy of documentation and spot inspections of facilities and equipment to verify compliance with the PTASP, procedures, codes, and regulations.

The following list of documents may be used to support the development of the audit checklists:

- PTASP
- Rule Book, bulletins, and/or procedures
- Standard and emergency operating procedures
- Training program documentation
- Management and/or administrative plans/procedures
- Design standards and criteria
- Event investigation reports

- Hazard tracking logs
- Corrective Action Plans
- Previous audit reports
- Other sources, as determined by TxDOT SSO upon request

5.5.1.6. Audit Report

Upon completion of each audit report, the City of El Paso Office of Risk Management will issue a final report of the results and specify areas of deficiency, prepare recommendations, identify the need for corrective action plans, and distribute copies of the report to the Sun Metro Management staff and the audited Division. Responsible Divisions are expected to develop corrective actions, though the audit team may make recommendations and must approve corrective actions.

The results of the audit will be used for positive corrective action, and not as an internal regulatory process. Safety Audit coordination meetings and management briefings are to be held to review areas of concern or disagreement over findings and evaluate possible corrective actions. The Safety Manager will monitor and track corrective actions with the affected divisions to ensure implementation.

The Chief Safety Officer or SMS Executive will provide a draft safety audit report generated by the City of El Paso Office of Risk Management to TxDOT SSO for the El Paso Streetcar. RTA shall submit the ISR final report to TxDOT within 60 days of the closeout meeting. In no case shall the RTA submit the ISR final report later than February 1st. TxDOT SSO will make additional recommendations to the audit report before the final issue of the report. The Office of Risk Management of the City of El Paso will submit the auditing reports to the Accountable Executive. The Accountable Executive is responsible for signing the report and submitting it to TxDOT.

5.5.1.7. Annual Report Review

Sun Metro/EPSC will prepare and submit an Annual Report to the State Safety Oversight (SSO) agency in compliance with the Federal Transit Administration (FTA) requirements. The Annual Report will provide a comprehensive summary of safety-related activities, performance, and initiatives undertaken during the reporting year.

The SMS Executive/Chief Safety Officer (CSO) will oversee the preparation of the Annual Report, ensuring that all required elements are included and accurate. The CSO will coordinate with the SSO agency to address any questions or additional requests regarding the submitted report.

Sun Metro/EPSC will adhere to the following timeline for the submission of the Annual Report to the SSO agency:

- By January 15th, TxDOT will review the required items and notify the RTA Safety Staff of any missing or outdated documents or data that the RTA must correct prior to TxDOT submitting the annual report to the FTA.

- No later than February 1st, the RTA must make all requested data corrections and submit any requested documentation to TxDOT. TxDOT SSO
- Program Managers will coordinate with RTA staff until all document and data requests are completed so TxDOT may submit the annual report by FTA's March 15th deadline.

Sun Metro/EPSC must also include a formal letter signed by the Executive Director/Accountable Executive certifying its PTASP. If the safety audit's findings indicate noncompliance with its PTASP, the Executive Director/Accountable Executive must identify in the formal letter the nature of the noncompliance, the activities that the RTA will take to achieve compliance, the date that those activities will be completed, and the projected date that compliance will be achieved.

5.5.1.8. Coordination with TxDOT

As noted above, the following aspects of the Internal Safety Audit Process are coordinated with TxDOT regarding the streetcar:

- Internal Safety Audit Cycle and Schedule
- Safety Audit Checklists
- Dates of Completion of each Safety Audit
- Each Safety Audit Report
- Corrective Action Plans
- The Annual Safety Audit Report
- The Director of Annual Certification

5.5.1.9. Review Completeness

The CSO (or other entity performing safety audits) is responsible for ensuring the Safety Audit Checklists provide for a complete review of each of the PTASP Elements. In addition, the Safety and Security Division (or other entity performing safety audits) shall ensure the required Safety Audit/Review reports are comprehensive and accurate.

5.5.2. Rules Compliance

Each Sun Metro mode is required to have and implement a Rules and Regulations Manual. These manuals are distributed to all new employees upon new recruit orientation. Ongoing training is provided through the rulebooks and procedures during operations and in maintenance training courses.

5.5.2.1. Review of Rules and Procedures

Policies, plans, rulebooks referenced above, and procedures are reviewed periodically to verify they meet the needs of the transit system in normal and emergency conditions. Accordingly, Sun Metro Instructors target safety practices intended to instill a safety culture in its workforce.

The Chief Safety Officer or SMS Executive and each mode's safety and operations manager coordinate additions to or deletions from these documents that impact the safe

operation of the system. Sun Metro Manuals, Policies, and Procedures by mode stipulate control and distribution, including the three-year review process.

The length of time needed for the review may vary based on the document being reviewed, but no reviewer should delay the evaluation/review process more than thirty (30) days. The section managers may issue a Bulletin, Notices, General Orders, and Operating Orders when an immediate update is required to an operating rule or procedure. Sun Metro safety committees, Safety Events, and audit reviews are additional opportunities for rules review.

5.5.2.2. Process for Rules Compliance

Each Sun Metro Supervisor (regardless of the mode) shall conduct ride checks of each operator at a rate determined by each mode.

Each mode uses specific **Ride Check Forms** to evaluate the operators in a standardized way. Ride Checks provide an opportunity for retraining employees to an acceptable level of compliance regarding specific rules.

Sun Metro Safety Division will perform random DVR reviews to verify the rule compliance of the drivers. Refer to SOP 600.13 Random DVR Inspections.

5.5.2.3. Compliance Techniques – Operations and Maintenance Personnel

Compliance techniques include observation of work activities and tasks, and asking pop-up questions regularly to employees about their knowledge of the respective rulebooks and handbooks. During initial training, employees are formally tested on their knowledge of applicable rules and procedures through written examinations.

5.5.2.4. Compliance Techniques – Supervisory Personnel

The Safety Manager or designee of each mode conducts ride checks to evaluate the effectiveness of compliance methods utilized by supervisory personnel. The ride checks assess employees' knowledge of rules and procedures and validate the success of Sun Metro's employee training programs.

Ride check forms completed are forwarded to the Mode Operations Manager to be included in employee performance reviews. Recommendations for improvement of the compliance methods are submitted.

5.5.2.5. Documentation

The results of the proficiency checks performed by operations and maintenance supervisors are documented on the appropriate form and are made available to the Safety Manager and Chief Safety Officer, or SMS Executive. Hazards identified during these operations and maintenance rules compliance checks and assessments are captured within the Hazard Tracking Log and subsequently tracked to closure.

All Ride Checks are performed following the transit mode SOP for Ride Checks. All forms will be included in the employees' training folder.

5.5.3. Local, State, and Federal Rules Compliance

Sun Metro is committed to a dedicated safety program covering all applicable federal, state, and local regulatory requirements to ensure a safe and healthy work environment, including guidance provided by the State Safety Oversight Agency, FTA, and Guidelines to prevent or control exposure to infectious diseases provided by the CDC or a State health authority.

The Safety Manager of each mode has the primary responsibility of safety program implementation and enforcement to ensure that the employees in their respective mode are aware of job-related hazards through an ongoing process of training, job briefings, and departmental notices located throughout all affected areas.

5.5.3.1. Risk Reduction Program

As established in the Bipartisan Infrastructure Law requires Sun Metro's Public Transportation Agency Safety Plan (PTASP) to include the risk reduction program that include the following topics:

- (I) Transit operations to improve safety by reducing the number and rates of events, injuries, and assaults on transit workers based on data submitted to the national transit database
 - a. The mitigation of assaults on transit workers, including the deployment of assault mitigation infrastructure and technology on Transit vehicles, including barriers to restrict the unwanted entry of individuals and objects into the workstations of transit operators, when a risk analysis performed by the safety committee determines that such barriers or other measures would reduce assaults on transit workers and injuries to transit workers.
- (II) A reduction of vehicular and pedestrian events involving transit vehicles includes measures to reduce visibility impairments for transit operators that contribute to safety events, including retrofits to vehicles in revenue service and specifications for future procurements that reduce visibility impairments.
- (III) The safety committee shall establish performance targets for the risk reduction program using a 3-year rolling average of the data submitted by the recipient to the national transit database under section 5335.

5.5.3.2. Sun Metro Risk Reduction Program Table by Mode

Sun Metro Para Transit

Risk Reduction Program Targets	2023	2024	2025*	2026
Total Vehicle Revenue Miles	1994510	2371684	2513985	2415952
Major Events Total	3	5	2	3
Major Events Rate	0.1504	0.2108	0.0795	0.0875
Collision Total	24	32	27	29
Collision Rate	1.2033	1.3492	1.0739	1.0875
Injuries	4	3	2	3
Injury Rate	5.36	3.13	2.34	3.01
Transit Worker Injury Rate	5.36	3.13	2.34	2.47
Assaults on Transit Workers	0	0	0	0
Assaults on Transit Workers' Rate	0	0	0	0
System Reliability				

Sun Metro Fixed Route

Risk Reduction Program Targets	2023	2024	2025*	2026
Total Vehicle Revenue Miles	5,712,826	5,589,182	5,478,070	5,649,201
Major Events Total	16	17	17	18
Major Events Rate	0.28	0.3	0.31	0.45
Collision Total	136	136	133	139
Collision Rate	2.38	2.43	2.42	2.45
Injuries	46	43	41	42
Injury Rate	9.23	8.33	8.2	8.53
Transit Worker Injury Rate	6.82	6.82	6.48	6.82
Assaults on Transit Workers	1	2	1	2
Assaults on Transit Workers' Rate	0	0	0	0
System Reliability	238,000	189,244	240,000	256,355

Sun Metro El Paso Streetcar

Risk Reduction Program Targets	2023	2024	2025*	2026
Total Vehicle Revenue Miles	41,046	67,275	73,734	85,094
Major Events Total	1	0	0	0
Major Events Rate	0.12	0	0	0
Collision Total	8	26	13	12
Collision Rate	0.97	1.93	1.49	1.33
Injuries	3	1	1	1
Injury Rate	11.53	3.84	8.4	1.18
Transit Worker Injury Rate	27.47	13.73	13.73	
Assaults on Transit Workers	0	1	0	0
Assaults on Transit Workers' Rate	0	0.07	0	0
System Reliability	39,812	67,275	70,000	85,094

5.5.3.3. Exposure to Infectious Diseases

As established in the Bipartisan Infrastructure Law, Sun Metro's Public Transportation Agency Safety Plan (PTASP), Sun Metro shall develop strategies to minimize the exposure of the public, personnel, and property to hazards and unsafe conditions, and consistent with guidelines of the Centers for Disease Control (CDC) and Prevention or a State health authority, minimize exposure to infectious diseases. To comply with this requirement, Sun Metro has established its Bloodborne Pathogens SOP and our Pandemic Plan to reflect the best practices of the industry and CDC guidelines.

5.5.3.4. Transit Worker Assault Awareness and Prevention for Transit Employees

To prevent and protect Transit Employees from physical assaults, including (hitting, spitting, beatings, stabbings, and things being thrown at operators, threats, intimidation, and any other hostile act.

- Install protection barriers or shields in the driver's area to minimize the severity of assault.
- Conduct conflict and aggression training for all transit employees, consisting of de-escalation techniques for drivers, focusing on key factors:
 - (I) Defining assault and identifying transit employee assault events – define what is considered assault and identify factors that increase vulnerability to assault events.
 - (II) Recognize key vulnerability factors – Identify behaviors that help maintain professionalism, decide which communication skills to use when dealing with

- passengers and customers, and practice strategies and techniques to defuse difficult interactions with the public.
- (III) Practice communication and response skills – Conduct role-playing scenarios and solutions to a potential assault scenario.
 - (IV) Reporting safety events – how to evaluate the severity and be able to report to the correct jurisdictional authorities
 - (V) Importance of seeking assistance when assault events occur – to realize the significance of reporting and explain the importance of seeking help and/or assisting when there is difficulty dealing with public assault events.

The above training standards and practices will assist transit employees in:

- Identifying safety hazards and potential consequences.
- Assess the associated safety risks and prioritize hazards based on the safety risk of potential consequences.
- Identify necessary mitigations or strategies to reduce the likelihood and severity of the hazard's potential consequences.

5.6. Corrective Actions

This section describes the general process of how Sun Metro will manage all corrective actions generated after the occurrence of a major event and subsequent investigation; the development of recommendations, the identification of an unacceptable hazardous condition, or hazards, along with deficiencies identified through internal or external safety reviews/audits.

The Mode Safety Manager will notify the CSO / SMS Executive and develop a CAP within 5 days of entering the CAP into Sun Metro's CAP Log. The CSO / SMS Executive will track and update the CAP Log every month. The Mode Safety Manager may request additional time to prepare the CAP for complex issues.

The corrective action plan will include:

- The hazard or deficiency identified, and an investigation (if relevant to the CAP);
- Proposed Corrective Actions
- Proposed Timeline

Proposed actions planned to minimize, control, correct, or eliminate the unsafe or hazardous condition, including interim action if required;

- Scheduled date of completion of implementation.
- Division and an individual responsible for implementing the CAP; and
- Comments were subsequently added pursuant to the review and closure of the CAP.

Sun Metro evaluates roadway worker safety using:

- **RWP compliance audits**
- **Field observations of RWICs and crews**

- **Track access protection verification**
- **Redundant protection performance reviews**
- **Near-miss and incident trend analysis**
- **Periodic review of OCC authorization logs**
- **Annual RWP Program audit** (required by 49 CFR 671.45)

Corrective actions related to RWP deficiencies must be tracked in the Safety Assurance Corrective Action Log and reviewed monthly.

Immediate or Emergency corrective action that must be taken to ensure immediate safety requires a 48-hour notification to TxDOT before implementation and must include:

- Source of the CAP,
- Location, if applicable,
- Summary of the issue requiring corrective action,
- Proposed corrective actions,
- If the CAP is an immediate or emergency corrective action,
- Date the issue requiring corrective action was discovered,
- Estimated start date,
- Estimated completion date, and
- Responsible Party and department(s) responsible.

The status of each Corrective Action is reported at LMSC Meetings. All corrective actions are prioritized for implementation using the risk assessment matrix, and they are assigned a responsible person to lead the corrective action effort and close the corrective action after resolution. TxDOT requires that El Paso Streetcar CAPs be uploaded and tracked using SSO Tracker within 30 days of discovery. An exception is made for immediate or emergency corrective actions that must be taken to ensure immediate safety, provided that TxDOT is notified within 48 hours of implementation. TxDOT will notify Sun Metro/EPSC of its approval or rejection of a CAP within 30 calendar days of receipt. In the event TxDOT rejects a CAP, TxDOT will state its reasons in writing and recommend revisions. Sun Metro/ EPSC shall submit a revised CAP to TxDOT no later than 14 calendar business days following the rejection. TxDOT will work with the Sun Metro/EPSC to resolve any disputes relating either to the development or execution of the CAP or the findings of an investigation. In the event of a dispute concerning TxDOT's decision related to a CAP, no later than 30 calendar days after receipt of the written decision, Sun Metro/ EPSC may request an on-site meeting or conference call with the TxDOT SSO Program Manager and PTN leadership to discuss the proposed CAP.

Sun Metro/EPSC may request an Administrative Review as specified in 43 TAC 7.93 to appeal the rejection or approval of a CAP. The Administrative Review will be decided by the TxDOT Executive Director or Deputy Executive Director and will be the final decision regarding the CAP. Each mode is required to develop an SOP on how the

mode will manage its specific CAPs. However, all SOPs must be approved by the CSO/SMS Executive for compliance with SUN Metro ASP.

In the event of a conflict between the definitions in the agency's safety plan, the TxDOT program standard, or federal regulations, the regulatory definitions shall take precedence.

Note: Sun Metro/EPSC acknowledges and will comply with the specific requirements outlined in Section 10.1 of the TxDOT Program Standard regarding TxDOT's authority to issue emergency orders, as detailed in Section 1.2 of the Program Standard, which provides the SSOA Authority and includes the escalation of enforcement actions if a RTA fails to comply with a corrective action plan, administrative action notification, or an emergency order.

5.7. Management of Change

The Management of Change addresses the processes to be followed to evaluate the risk of any changes proposed at all levels of the organization. The overall purpose of this process is to ensure that any proposed changes that impact operations will not increase safety risk, or where additional risk is identified, that controls are put in place prior to the changes being implemented. Refer to Appendix C for a copy of the Configuration Management Plan.

Changes to organizational structure, the nature or extent of operations, facility or equipment assets, as well as mergers and acquisitions of new businesses, are proactively managed through this process to avoid introducing or increasing safety risks.

- The resources required to complete the validation process, in terms of people, finance, and materials, are included in this validation process.
- The allocation of responsibilities considers the competence of the individuals who are required to carry out the safety validation roles.
- All employees who may be affected by the proposed changes are consulted as part of the process.

The extent and scope of safety validation applied to any change proposal are proportional to the risks (safety, operational, and other risks) associated with its introduction.

In the case of smaller, less complex, or well-understood changes, the safety validation of the change process may be implemented as part of normal operations, using existing organizational arrangements and meeting structures to deliver the required level of assurance.

Changes shall be classified as either Class I or Class II levels of safety validation. The originator may make an initial determination of the class of a proposed change; however, the Accountable Executive, the Chief Safety Officer, or the SMS Executive may make changes to the original classification. The Accountable Executive has final decision-making authority as to the Class of the configuration change.

Class I Changes

Class I changes shall be developed and individually submitted for each proposed change through a standardized Engineering Change Request (ECR) document, and/or through some other approved documented request process. The ECR or documented request will provide detailed information and any other related data to support the formal change approval, which will affect a change to the configuration of an asset. Class I changes directly affect the following:

- a. Form, fit, or function of an asset
- b. Safety of the transit system
- c. Warranty provisions of the test
- d. Acquisition or support costs of an asset or future spare parts

Class II Changes

Class II changes are all changes that are not classified as Class I changes. Generally, Class II changes are those required to amend, update, or add clarification to documents and drawings. All Class II changes are to be submitted individually on a standardized form, and/or through a documented request, with a detailed description of the proposed change.

The process is generally described in the following chart.

Safety Validation of Change Process		
Main Steps	Key Activities	Completed By
1. Identify a Proposal for Change	- Raise a change proposal (including Capital Expenditure Approval) - Inform relevant functional Manager(s)	Change proposer
2. Determine the Classification of Change Significance	- Classify the level of safety validation required. - Ensure the extent and scope of validation are proportional to the level of risk.	Change proposer
3. Allocate Roles & Responsibilities	- Formally allocate the change sponsor and change authorizer - Identify other required resources and roles for consultation	Change proposer (with guidance)
Submit Change Proposal Form		Change proposer
Decide whether safety validation should proceed.		Change proposer
4. Prepare Safety Validation of Change Case	- Prepare safety validation documentation - Complete risk assessment of the proposed change - Submit for review - Revise and finalize documentation	Change proposer & Mode Safety Manager
Submit the Safety Validation Checklist with supporting documentation		Change proposer
Approve and Implement, or Reject Change		CSO, AE

Safety Validation of Change Process		
Main Steps	Key Activities	Completed By
5. Monitoring and Review	- Monitor implementation of change and safety performance - Review the performance process	Safety Manager

As part of the process to ensure specific safety concerns have been identified and addressed.

Additional responsibilities in the Safety Validation of Change process include:

- CSO provides safety expertise/support to those carrying out the safety validation.
- Safety Managers:
 - Review and approve each safety validation of the change process.
 - Decide on the level of safety validation required (consulting with other functional heads as necessary).
 - Provide safety expertise/support during safety validation activities as required.
 - Provide safety expertise/support to those carrying out the safety validation.

An electronic log of all proposed changes, whether approved or not, is maintained by the Mode-specific Safety Manager.

Each mode is responsible for developing its Management of Change SOP based on the process described previously. These SOPs will be submitted to the CSO / SMS Executive and AE for review and approval.

The process described previously in this section for monitoring safety data incorporates continuous improvement. As safety risk is identified and then reported on, a determination is made as to whether the risk can be mitigated immediately or requires more time and resources.

Risk mitigations that can address the safety concerns immediately are carried out, but are still reported. The reporting of these concerns includes the mitigation steps that have been taken. Monitoring of the risk continues to ensure that the mitigation strategy is effective.

The Safety Risk Management section of this document describes the risk assessment and mitigation procedures used that determine how to proceed with improvement strategies that require more time and resources. Which improvement strategies to implement for longer-term issues are based on the severity and probability of risk occurrence? Additionally, safety hazard identification data is used to implement immediate corrective actions and proactively identify hazards before they cause future safety events.

The objective of hazard identification is to distinguish those conditions that can cause an event or create an unsafe condition. Sun Metro routinely analyzes records from our

operations to identify event causation based on history. Current traffic conditions are periodically analyzed, and management inspections of established prevention processes are routinely performed.

New or Modified Rail System Requirements

El Paso Streetcar/Sun Metro is required to develop and submit a safety and security certification plan (SSCP) for TxDOT approval for new or modified rail systems. For smaller projects that do not involve preliminary engineering or engineering, RTAs must submit the SSCP prior to commencing the project. For larger projects that follow a traditional project development phase, TxDOT requires the SSCP to be submitted not later than the end of the preliminary engineering phase. In either case, TxDOT will coordinate with the RTA to reach a mutually agreeable date for the submission of the SSCP.

The SSCP is a scalable, project-specific plan that describes the activities the RTA will complete to ensure safety concerns and hazards are adequately addressed prior to the initiation of revenue operations. TxDOT will review the SSCP within 30 days of submission.

Safety and Security Certification Verification Report (SSCVR)

At least 60 calendar days prior to revenue service or non-revenue/operational use, EPSC/Sun Metro will submit a SSCVR to TxDOT for review.

The SSCVR is the final report verifying that the project complies with all safety requirements identified by the agency's SSCP. The SSCVR shall contain:

- Executive summary of the project status
- Summary of Activities Performed:
 - Certifiable items list
 - Completed conformance checklists and certificates
 - Integrated testing results
 - Updated manuals, SOPs, and procedures
 - Operations and maintenance training
 - Hazard Assessments, including associated hazard logs
- List of open items or logs, restrictions, and hazards, and the plan, including actions required, responsibility, and schedule for resolving open items, restrictions, and hazards
- Certificate of Safety verifying the project is safe for revenue service

TxDOT will review the SSCVR within 30 days to determine project conformance with the SSCP and PTASP, and to assess if Sun Metro/ EPSC complies with TxDOT requirements. During the review period, TxDOT may conduct readiness review activities, including on-site reviews, observations, meetings, and teleconferences. Additional information, documentation, or clarification may be requested by TxDOT before concurrence is provided. At the conclusion of the review period, TxDOT will

provide a letter of concurrence to the SMS Executive/CSO stating the project has satisfied TxDOT SSO requirements.

6.0 Safety Promotion Chapter (49 CFR 673.29)

6.1 Competencies and Training Section

- Instructions on safe methods of operation and safety procedures are included in rulebooks, manuals, handbooks, and other documentation developed for the training and certification of operations and maintenance personnel. Training systems have been developed to include in-house classroom training, field training, on-the-job training, and testing.
- Each Mode is responsible for establishing specific safety training requirements for its employees and contractors. The Mode Safety Manager is responsible for providing/coordinating new and revised safety training programs to the Chief Safety Officer or SMS Executive for approval.
- Each mode Training Plan must be compliant with 49 CFR 672 Public Transportation Safety Certification Training Program. As required, the Mode Training Plan must identify the safety-sensitive positions and their safety curriculum per position, including required retraining.

Sun Metro ensures roadway workers receive:

- Initial and recurring RWP training
- RWIC training and qualification
- Lone worker training
- On-track safety drills
- Emergency management training
- Job Safety Briefing competency checks

Safety communication includes:

- RWP bulletins
- Safety messages
- Distribution of rule updates
- Posting of updated RWP procedures at dispatch and maintenance areas

Employees must demonstrate competency through testing, field evaluations, and annual refresher training.

6.1.1 Training and Certification Program

Each Mode Safety Manager at Sun Metro is responsible for the development and implementation of their respective Training and Certification Plans (TCPs). These plans align with the requirements outlined in the **Public Transportation Safety Certification Training Program (PTSCTP)** as per **49 CFR Part 672** and the **Public Transportation Agency Safety Plan (PTASP)** as per **49 CFR Part 673**.

1. Regulatory Requirements
 - FTA's Public Transportation Safety Certification Training Program (PTSCTP)
 - Establishes a uniform safety certification training curriculum to enhance the technical proficiency of individuals conducting safety audits and examinations. (§672.1(a))
 - Applies to personnel directly responsible for safety oversight of public transportation systems.
 - FTA's Public Transportation Agency Safety Plan (PTASP)
Requires the establishment and implementation of a comprehensive safety training program for employees and contractors directly responsible for safety.
 - Mandates refresher training as necessary. (§673.29(a))

Designation of Safety Personnel

In accordance with **49 CFR 672.13**, Sun Metro designates specific personnel subject to PTSCTP requirements. Designated personnel are those whose primary job functions include developing, implementing, and reviewing the PTASP and related safety oversight activities.

The following positions at Sun Metro are classified as **Designated Personnel**:

1. Chief Safety Officer (CSO) or SMS Executive
2. Transit Safety Manager
3. Streetcar Safety Manager
4. Transit Safety & Security Officers
5. LIFT Operations and Safety Manager
6. Risk Management Senior Safety Specialist (responsible for audits)

Training Requirements for Designated Personnel

Designated personnel must complete the following training requirements within three years of their initial designation:

- SMS Awareness: 1 hour
- Safety Assurance: 2 hours
- SMS Principles for Transit: 20 hours
- TSSP Curriculum:
 - Rail System Safety: 36 hours
 - Effectively Managing Transit Emergencies: 32 hours
 - Rail Incident Investigation: 36 hours

Refresher Training:

- Required every two years.
- Must include a minimum of one hour of safety oversight training.
- Sun Metro documents refresher training requirements within the PTASP and ensures compliance.

Evaluation of Prior Training and Certification

Designated personnel may request the Federal Transit Administration (FTA) to evaluate prior safety training or certifications to determine if they meet the requirements of **49 CFR 672**. Requests are submitted to the FTA via **FTASafetyPromotion@dot.gov**.

Recordkeeping and Individual Training Plans (ITPs)

In compliance with **49 CFR 672.21**, Sun Metro ensures:

- All designated personnel enroll in the PTSCTP.
- Individual Training Plans (ITPs) are created, maintained, and updated as training is completed.
- Training records are retained for at least five years.
- Information on enrollment and ITP creation is available on the FTA's Transit Safety Training webpage: FTA Transit Safety Training.

Existing Training Plans

- El Paso Streetcar Training Plan:
 - Revision 1, dated September 2021, reviewed and approved by TxDOT.
 - Includes training on required Standard Operating Procedures (SOPs) for operations and maintenance.
- Maintenance Training:
 - Maintenance personnel are trained on Standard Maintenance Procedures developed by Sun Metro/El Paso Streetcar.

Annual Review and Compliance

Each mode's Training and Certification Plan must be:

- Submitted to the Chief Safety Officer or SMS Executive for review and concurrence.
- Reviewed annually by the Mode Safety Manager to ensure compliance with PTSCTP and PTASP regulations, and updated as necessary to reflect operational or regulatory changes.

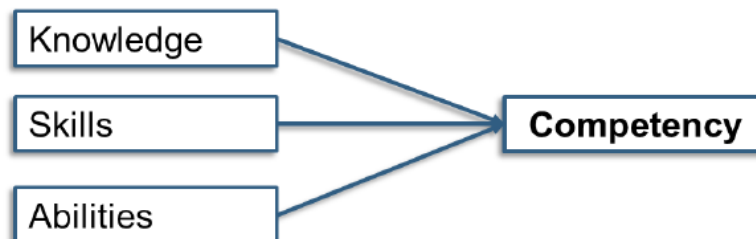
Notification and Coordination with SSO

- Sun Metro collaborates with the Texas Department of Transportation (TxDOT) as part of the SSO program.
- The CSO ensures notification to the SSO regarding the completion of required training, certifications, and any updates to TCPs.
- Annual submissions to the SSO include:
 - Designated personnel certifications.
 - Training program updates and compliance reports.
 - Internal Safety Review findings and resolutions.

6.1.2 Competency

Competency combines the knowledge, skills, and abilities required to effectively fulfill job roles.

- 1) May cross various job roles and functions
- 2) May be useful as an employee training topic
- 3) Can be developed from a variety of sources



The safety managers of each mode are responsible for the competency of their employees and compliance with their individual Training Plans. The specific mode Training Plan must discuss what tools will be used to measure the competency of the personnel. Some examples are:

- Written test
- OJT test
- Exercises

6.1.3 Hazardous Materials Training

Sun Metro is fully aware of the importance of employee chemical safety programs and the duty to comply with legally mandated hazardous materials rules and regulations. To this end, Sun Metro has implemented a materials acceptance/rejection program to monitor and control chemicals, which are brought onto Sun Metro property to be used by employees.

Sun Metro's Hazard Communication Program (rev 0) Hazard Communication Program. Sun Metro's Hazard Communication Program covers the procurement, receipt, storage, and disposal of hazardous materials. It also documents the maintenance of Safety Data Sheet (SDS) binders and employee training.

Hazardous waste/chemical safety inspections are included in the responsibilities for safety inspections. Sun Metro has contracted the services of a properly licensed hazardous waste contractor for the removal of hazardous materials. When necessary, consultants may be hired for special projects such as indoor air quality, chemical vapor, and particulate sampling.

The Safety Manager by Mode reserves the right to reject a product if it is deemed either too hazardous for employee use or if Sun Metro is unable to provide adequate safeguards or protection.

6.1.4 Drug and Alcohol Program / Training

Sun Metro is certified as a drug-free workplace and complies with all provisions of the U.S. Department of Transportation, Federal Transit Administration, 49 CFR Part 655, Prevention of Alcohol Misuse in Transit Operations, and 49 CFR Part 40 Procedures for Transportation Workplace Drug and Alcohol Testing Programs. All Sun Metro Transit Modes follow the Sun Metro Substance Abuse Policy dated April 1, 2018.

Covered employees will receive a minimum of 60 minutes of training on the effects and consequences of prohibited drug use and additional training on the effects of alcohol on personal health, safety, and the work environment, and on the signs and symptoms that may indicate prohibited drug use. Supervisors will, in addition to the covered employee training, receive an additional minimum of 60 minutes of training on the physical, behavioral, speech, and performance indicators of probable drug use. Supervisors will receive a minimum of an additional 60 minutes of training on the physical, behavioral, speech, and performance indicators of probable alcohol misuse.

City Human Resources, along with the Sun Metro Safety Managers and Sun Metro Human Resources Section, is responsible for administering City Policy Drug and Alcohol-Free Workplace regulations.

Drug and alcohol testing is required under the following circumstances:

- Pre-employment, including placement of an existing employee in a safety-sensitive position (drug test only)

- Reasonable suspicion that an employee has used a prohibited drug or misused alcohol
- Post-accident, following certain types of events
- Random testing for safety-sensitive personnel
- Return to duty following completion of the drug/alcohol rehabilitation program
- Follow-up testing for employees who have sought and completed a treatment program

Under the FTA drug testing regulations for employees in safety-sensitive positions, laboratory tests on urine specimens are conducted for five types of drugs or their metabolites. These drugs are:

- Marijuana
- Cocaine
- Phencyclidine (PCP)
- Amphetamines (e.g., racemic amphetamine, dextroamphetamine, and methamphetamine)
- Opiates (e.g., heroin, morphine, codeine)

Sun Metro assists city employees with personal or related problems that could affect job performance through the Employee Assistance Program. On-site contractors working in Safety-Sensitive positions on Sun Metro property or ROW must have a drug and alcohol policy that complies with DOT guidelines.

The following positions fall under the definition of Safety Sensitive:

Operations

- Transit Operator Operate Revenue Service Vehicles*
- Transit Operator / Trainee Operate Revenue Service Vehicles*
- Transit Supervisor Controls Movement of Revenue Service Vehicles*
- Communication Dispatcher Controls Movement of Revenue Service Vehicles*
- The Transit Chief Safety Officer or SMS Executive manages the Safety and security of the Streetcar
- Chief Streetcar Officer Manages Streetcar Operations
- Assistant Director of Operations Manages Transit Operations
- Transit Superintendent of Operations Manages Transit Operations
- Transit Assistant Superintendent of Operations Manager Transit Operations

Maintenance

- Transit Fleet Service Supervisor: Maintain Revenue Service Vehicles
- Fleet Service Worker: Maintain Revenue Service Vehicles
- Fleet Services Assistant: Maintain Revenue Service Vehicles
- Fleet Maintenance Supervisor: Maintain Revenue Service Vehicles
- Fleet Maintenance Chief: Maintain Revenue Service Vehicles

- Fleet Maintenance Lead Technician Maintain Revenue Service Vehicles
- Fleet Maintenance Technician: Maintain Revenue Service Vehicles
- Electronics Lead Technician Maintain Revenue Service Vehicles
- Electronics Technician Maintain Revenue Service Vehicles
- Fleet Body Shop Supervisor: Maintain Revenue Service Vehicles
- Fleet Body Shop Technician/Lead Tech Maintain Revenue Service Vehicles
- Fleet Maintenance Trainer Supervisor Maintain Revenue Service Vehicles
- General Services Worker: Maintain Revenue Service Vehicles
- Streetcar Hostler Maintain Streetcar
- Streetcar Maintenance Technician: Maintain Revenue Service Vehicle
- Streetcar Maintenance Supervisor Manages Streetcar Revenue Service Vehicles

*Vehicles refer to either a bus or a streetcar

6.1.5 Recordkeeping

All Sun Metro employees' training records are maintained by the corresponding modes (Streetcar, Fixed Route, and Paratransit)

Contractor training records are kept by following the individual companies' policies. However, these records must be available to Sun Metro at any time for inspection or audit.

6.2 Training and Communication

Sun Metro is committed to equipping all employees with the knowledge and tools necessary to identify and report safety concerns as part of our Safety Management System (SMS). To achieve this, Sun Metro provides specialized training on safety concern identification and reporting to ensure compliance with 49 CFR § 673.29(a).

Training Objectives:

- Educate employees on how to recognize potential safety hazards and concerns within their scope of work.
- Provide clear instructions on the procedures for reporting identified safety concerns through established channels (e.g., safety hotline, supervisor reports, or digital reporting tools).
- Reinforce the importance of proactive safety concern reporting to reduce risks and prevent incidents.

Training Components:

1. Hazard Identification Basics:

- Recognizing unsafe conditions, acts, or system vulnerabilities.
- Examples of common hazards in transit operations and maintenance environments.

2. Reporting Protocols:

- How to submit safety concerns through Sun Metro's incident reporting system.

- Understanding confidentiality protections and Sun Metro's commitment to a non-punitive reporting environment.
- 3. **Follow-Up Processes:**
 - Overview of how the Safety Risk Management (SRM) process addresses reported concerns.
 - Examples of corrective actions taken in response to employee-reported safety issues.

Training Schedule:

- Initial training is provided during employee onboarding.
- Annual refresher courses for all staff, with additional sessions for supervisors and managers.
- Ongoing communication through safety bulletins, toolbox talks, and committee meetings.

Performance Metrics:

- An increase in the number of safety concerns reported annually indicates improved employee engagement in hazard identification.
- Reduced response times for addressing and mitigating reported hazards.

6.3 Safety Communication:

At Sun Metro communication program goals are:

- Conveys information on hazards and safety risks relevant to Sun Metro employees and contractors' roles and responsibilities.
- Informs Sun Metro employees & and contractors of safety actions taken in response to reports submitted through the Sun Metro employee safety reporting program

Safety communication IS data sharing. This data sharing happens in several ways:

- Sharing data with compliance authorities;
- Sharing data with other service providers; and
- Sharing data with employees and contractors.

Safety communication has significant implications for safety culture and transparency. You might even say that transparency is simply how much information you communicate.

These are important points because the term "safety communication" does not quite capture the fact that what we are talking about is:

- The type of safety culture management practices;
- The type of relationship management it has with front-line employees and other organizations, and
- How much trust does management have in employees?

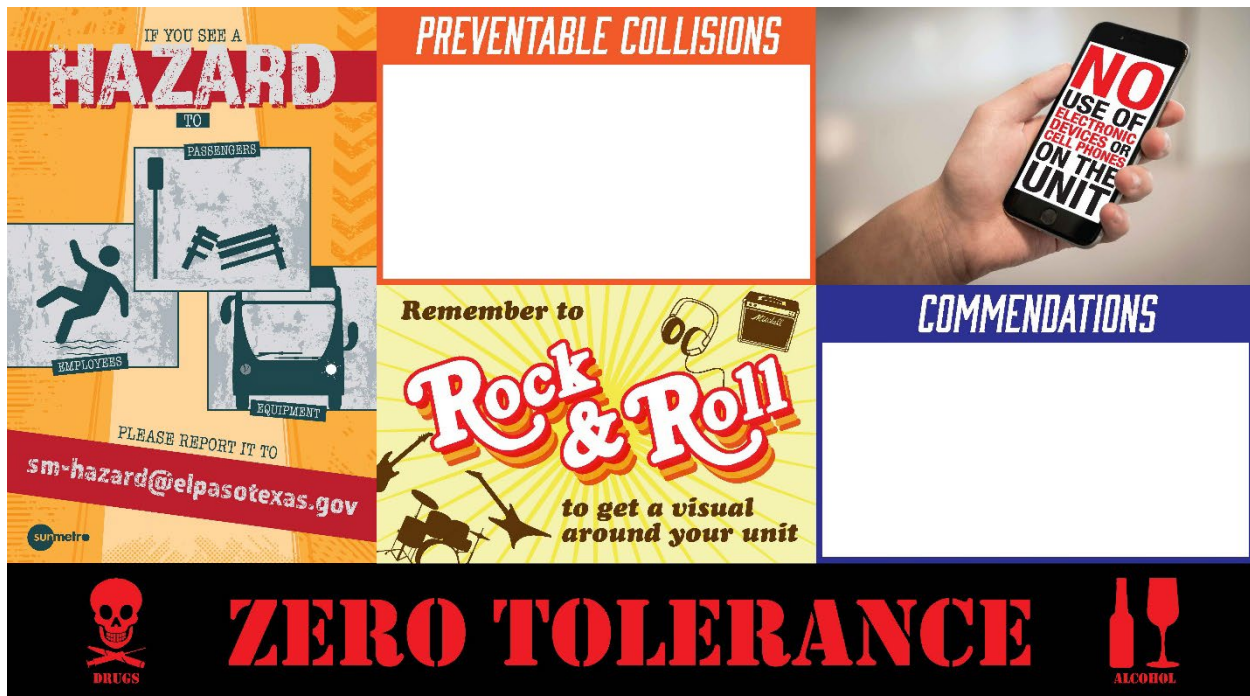
Some best practices for communicating safety are:

- Having very clear internal rules or guidelines on role-based access to data – i.e., who can see what;
- Having many ways of implicitly and explicitly communicating data, such as:
 - Implicit: an issue manager that displays reported issue summaries;
 - Explicit: Sending out monthly newsletters
- Be as transparent with safety information as possible, as sharing too little or too much can hurt your safety culture.

At Sun Metro, safety communication will be implemented using the following tools to spread information throughout the system.

- Monthly Safety Meetings: Participation in this meeting is **mandatory** for all employees and supervisors. This meeting is led by the Mode Safety Manager and the CSO. The monthly safety meeting will be the forum where employees will be kept informed of how Sun Metro is managing the hazards and what mitigating actions are being implemented.
- Maintenance safety toolbox: This is a monthly meeting of the maintenance staff to discuss safety issues and also present the monthly safety video for maintenance.
- Toolbox: The supervisors will perform toolbox meetings to discuss any new train orders, rules, or SOPs. These toolboxes are documented by the supervisor.
- Job briefings: Every time non-routine work is performed, a job briefing is held to discuss the hazards associated with the task.
- Safety Boards: Each mode will develop and keep updating a billboard that will be used to communicate with the employees. The billboard must be kept up to date by the Safety Manager of the mode.

Additionally, the safety committees will play a key role in fostering a cooperative approach to hazard mitigation. Information discussed within the safety committees, including actions taken to mitigate hazards or address safety concerns, will be shared with employees using safety boards and safety monitors. These tools ensure transparency and keep employees informed about ongoing safety efforts and committee decisions.



Sun Metro Bulletin Art.

6.3.1 Safety Committees

Sun Metro uses a multi-stakeholder approach to the Safety meetings, where every Sun Metro division is involved, along with any external agency that has a direct or indirect impact on transit operations. The Fire/Life Safety Committee (FLSC) is comprised of the following agencies:

- Sun Metro
 - Safety and Security
 - Fixed Route
 - Paratransit and Streetcar
- City Departments
 - Police
 - Fire
 - Streets and Maintenance
 - Risk Management
- UTEP
- TxDOT

The Sun Metro Fire/Life Safety Committee (FLSC) consists of a representative of every department and external agency. This committee meets every quarter.

The Division's Safety Committees are headed by a Transit Safety Officer or Mode Safety Manager and a manager of the division. They will be the front-line eyes and ears of Sun Metro Safety Division. In Sun Metro, there will be the following safety committees:

- Facility & Vehicle Maintenance
- Operations
- Streetcar

The FLSC committee meets every quarter and is used to address the following:

- Bring specific concerns to the attention of the CSO.
- Ensure that all major events, hazards, and internal safety issues are reviewed and resolved.
- Conduct internal safety reviews and inspections.
- Report unacceptable hazardous conditions to Sun Metro executive management as soon as possible.
- Work with modal operations and maintenance staff daily to ensure all System Safety Program requirements are being implemented and Program goals and objectives are being achieved.
- Develop Corrective Action Plans (CAP) that result from safety event investigations, hazard analyses, safety reviews, and audits, and track corrective actions through fruition to ensure all identified deficiencies are adequately eliminated or controlled.
- Ensure the Accountable Executive, CSO or SMS Executive, Mode Safety Managers, and other upper management personnel are immediately notified of hazards of imminent danger or as other problems are identified or arise.
- Ensure recommendations are followed up on and corrected
- Review findings and comprehensive reports with recommendations, findings, and actions that cannot be resolved by staff. Develop action plans and monitor the implementation of any corrective action plan pursuant to any reports and recommendations
- Review, approve, or recommend changes to the reports and corrective action plans, prepared by the Committee for safety hazards and threat and vulnerabilities audit findings and corrective actions, prior to submittal of the final reports to the responsible parties for implementation
- Review, approve, or recommend changes to corrective action plans that are developed in response to recommendations of the TxDOT.
- Review, approve, or recommend changes to the annual reports of the internal safety review process required for submission to the TxDOT.
- Review, approve, or recommend changes to Sun Metro's safety rules and procedures established to implement the requirements and programs defined in the PTASP.

Under **49 CFR 673.19(b)**, the new ruling for the Public Transportation Agency Safety Plan (PTASP) includes specific provisions for the establishment and structure of a **Labor-Management Safety Committee (LMSC)**. The following points highlight Sun Metro's compliance with these requirements:

- 6.2.1.1 Equal Representation of the LMSC:** The LMSC at Sun Metro must consist of an **equal number of frontline transit worker representatives and management representatives**. This ensures that both groups have balanced input into safety-related decision-making and discussions.
- 6.2.1.2 Frontline Transit Worker Representation:** The frontline representatives on the LMSC will represent **major transit service functions**, such as operations and maintenance, from across the entire transit system. This diverse representation ensures that the safety concerns of all key functional areas are addressed in the committee's work.
- 6.2.1.3 Civil Service Representation:** Sun Metro transit workers are represented by the Civil Service, and they are not represented by a labor organization with bargaining rights with the City of El Paso. As a result, the LMSC reflects the unique organizational structure of Sun Metro.
- 6.2.1.4 Mechanism for Selecting Frontline Transit Worker Representatives:** To ensure fair representation, Sun Metro has adopted a **mechanism for selecting frontline transit worker representatives** for the LMSC. Annually, all frontline employees are asked if they are interested in the LMSC. Those who express interest will be appointed to the committee. This allows frontline employees from different service functions to participate in the committee and advocate for safety improvements within their areas of expertise. Committee members are compensated while participating in the LMSC.

Purpose of the LMSC: The LMSC plays a critical role in ensuring continuous communication between Sun Metro management and frontline workers regarding safety issues, concerns, and improvements. It supports the **Safety Management System (SMS)** by incorporating the input of employees who have firsthand experience with daily transit operations and maintenance activities.

Procedures:

The Labor-Management Safety Committee (LMSC) at Sun Metro is designed to align with the new ruling under **49 CFR 673.19(c)**, focusing on organizational structure, composition, responsibilities, operations, and procedures. The following outlines the compliance strategy:

6.3 Documentation of LMSC Composition, Responsibilities, and Operations:

Sun Metro has established detailed documentation of the LMSC's **composition, responsibilities, and operations** in accordance with the following provisions:

- **Organizational Structure:**
The LMSC reports directly to the **Accountable Executive** and works within the Safety Management System (SMS) framework. The committee is part of Sun Metro's organizational structure aimed at enhancing transit safety through collaborative input from management and frontline workers.
- **Size and Composition:**
The committee consists of an **equal number of management representatives and frontline transit worker representatives**, with frontline workers representing key service functions such as operations and maintenance. This balance ensures that both management and workers' perspectives are considered in all safety discussions and decisions. The members are selected using a mechanism designed by Sun Metro, in accordance with its policy on Civil Service representation.
- **Committee Leadership:**
The LMSC is **chaired by a designated management representative**, with a frontline worker representative serving as **vice-chair**. This leadership structure ensures that both management and employees play active roles in guiding the committee's efforts and addressing safety issues.

6.3.1 Meeting Procedures and Record Keeping:

- **Development and Sharing of Meeting Agendas and Notices:**
Agendas for LMSC meetings are developed collaboratively by the chair, vice-chair, and committee members. Agendas are distributed to all members in advance of each meeting, along with a **meeting notice** that includes the time, location, and topics to be discussed. This information is shared through Sun Metro's internal communication channels, such as email, bulletin boards, and digital workplace platforms, ensuring transparency and preparedness.
- **Recording and Maintenance of Meeting Minutes:**
The LMSC will ensure that **meeting minutes** are taken at each session, detailing the key points of discussion, decisions made, and action items. These minutes are reviewed by the committee for accuracy and then maintained in a centralized, secure digital archive. They are made available to all LMSC members and key stakeholders and are used as a reference for tracking progress and accountability.

6.3.2 Training for Safety Committee Members:

Sun Metro provides **regular training for LMSC members**, ensuring that they are equipped with the necessary knowledge and skills to support the agency's Safety Management System (SMS). This training includes:

- **Safety Management System (SMS) Fundamentals:**
Training on SMS principles, including hazard identification, risk assessment, and safety assurance processes.
- **Roles and Responsibilities:**
Detailed training on the roles and responsibilities of LMSC members, emphasizing how their input contributes to system-wide safety improvements.
- **Collaborative Safety Practices:**
Training on how to facilitate open communication, resolve conflicts, and engage in constructive problem-solving during LMSC meetings.

Training is updated as necessary to reflect changes in safety standards, operational practices, or regulatory requirements. The training program supports Sun Metro's SMS by ensuring committee members are active, informed participants in safety initiatives.

6.3.4 Policy for Participation in the LMSC:

Sun Metro has implemented a **policy for participation in the LMSC**, which includes clear guidelines on:

- **Attendance Requirements:**
Committee members are expected to attend all scheduled meetings and actively participate in discussions and decision-making processes.
- **Engagement and Contributions:**
All members, whether representing management or frontline workers, are encouraged to contribute openly and honestly, sharing insights based on their roles and experiences. Members are also responsible for bringing forth safety concerns from their respective areas for the committee's consideration.
- **Accountability:**
To maintain the integrity of the LMSC, Sun Metro tracks members' participation and contribution, and attendance records are documented as part of the meeting minutes.

6.3.5 Access to Technical Experts, Information, and Safety Reporting Program Submissions:

- **Access to Technical Experts:**
The LMSC may, as necessary, access **technical experts** both within and outside Sun Metro, including transit workers, to provide insight on specialized safety issues. These experts may serve in an **adversary or consultative capacity**, depending on the nature of the safety matter under review, and are brought in to offer objective assessments of risks or procedures.

- **Access to Sun Metro Information, Resources, and Tools:**
The LMSC has access to Sun Metro's internal **safety information, resources, and tools**, such as data from operations, maintenance records, safety audits, risk assessments, and event reports. This access ensures that the committee has the necessary context and information for informed decision-making.
- **Access to the Safety Reporting Program:**
The committee reviews submissions made through **Sun Metro's transit worker safety reporting program** to support its deliberations. This enables the LMSC to address concerns raised by employees and use this information to assess ongoing safety risks and evaluate safety trends across the system.

6.3.6 Decision-Making and Recording:

- **Decision-Making Process:**
The LMSC operates on a **consensus-based decision-making process** whenever possible. When consensus cannot be reached, the committee will hold a vote, with an equal number of votes allocated to both frontline transit worker representatives and management representatives.
- **Recording of Decisions:**
All decisions, whether reached by consensus or vote, will be **recorded in the meeting minutes**, along with any action items or follow-up responsibilities assigned to specific members. These decisions will be maintained in Sun Metro's safety management archives and are subject to review as necessary.

6.3.7 Coordination and Communication with the Mass Transit Board and the Accountable Executive:

- **Accountable Executive's Role:**
The **Accountable Executive** is an active member of the LMSC, participating directly in the committee's deliberations, offering guidance, and ensuring alignment with Sun Metro's overall safety goals. This ensures that senior leadership remains closely involved in frontline safety efforts.
- **Coordination with the Mass Transit Board:**
The Accountable Executive provides regular updates to the **Mass Transit Board** regarding the status of safety initiatives, safety performance trends, and committee decisions. These updates may include written reports, presentations, and progress on action items derived from LMSC meetings. Coordination is facilitated through the Accountable Executive, who ensures that the Board is informed and engaged with the committee's work.

6.3.8 Dispute Resolution:

- Dispute Management:**
 To ensure that the LMSC can continue its operations effectively, Sun Metro has established a procedure for resolving disputes within the committee. If disagreements arise that cannot be resolved internally, the issue will be escalated to the **Accountable Executive** for mediation. In cases where further resolution is needed, Sun Metro will seek input from the **Mass Transit Department Board** or external safety experts to ensure that operations proceed without disruption.

6.3.9 Review and Approval of PTASP

- PTASP Review and Approval:**
 The LMSC is responsible for reviewing and approving Sun Metro's **Public Transportation Agency Safety Plan (PTASP)** and any subsequent updates, as required by **§ 673.11(a)(1)(i)**. The committee conducts an annual review of the PTASP, ensuring it reflects any changes in operations, risk environments, or regulatory requirements. To demonstrate the safety committee's approval of the ASP, meeting minutes with the approval date will be provided separately from the PTASP document. The Accountable Executive will sign off on the final version of the PTASP before submission to the **Mass Transit Board** for final approval.

6.3.10 Setting Annual Safety Performance Targets:

- Annual Safety Performance Targets:**
 Sun Metro, with input from the LMSC, will set **annual safety performance targets** as part of its **safety risk reduction program**, in accordance with **§ 673.11(a)(7)(iii)**. These targets are developed based on safety data, risk assessments, and transit worker safety reporting program insights. The committee will track the progress of these targets and assess the effectiveness of risk mitigation measures throughout the year.

6.3.11 Identifying and recommending Mitigations:

- Sun Metro, with the input of the LMSC, will be responsible for **identifying and recommending mitigations** to reduce the likelihood and severity of risks identified in the agency's safety risk assessment, especially where safety performance targets were not met in accordance with 673.19(d)(3)(i). All mitigations are identified and mitigated, and recommended by the safety committee incorporated by reference in the ASP.

6.3.12 Continuous Improvements:

- To support continuous improvement per **§ 673.27(d)**, the Safety Committee will **identify safety deficiencies** by regularly reviewing safety event data, safety audits, and feedback from staff. This includes pinpointing any areas where the transit

agency has not met annual safety performance targets. By addressing these deficiencies, the Committee can recommend adjustments to improve safety measures, ensuring that risk reduction efforts are effective and aligned with performance goals.

7 Emergency Preparedness and Response Plan

Major events such as accidents, fires, floods, violent crime, and terrorist attacks present significant challenges for public transit agencies. To successfully manage these events, personnel from multiple disciplines and agencies work together to promote the highest level of safety and to execute tasks such as perimeter control, rescuing or evacuating passengers, supporting the transportation of emergency responders and equipment, managing victims and their families, controlling crowds, repairing facilities, communicating with the media, and restoring service.

Sun Metro management recognizes that safety, security, and emergency preparedness encompass not only the system, including employees, facilities, passengers, and operations, but also the local responders, planning organizations, and mutual aid partners within the communities it serves. Sun Metro has developed a coordinated emergency response program and a schedule of planned activities and exercises that encompasses local emergency responders and relevant planning agencies, and establishes a working partnership that allows all entities to work together to identify vulnerabilities that may impact our respective ability to respond and recover from a major emergency event. This effort is a continuous process that employs four integral functions: planning, inter-agency coordination, training, and exercises.

7.1 Planning

7.1.1 Sun Metro Emergency Preparedness and Continuity Plan

Sun Metro has a comprehensive System Security and Emergency Preparedness Plan (SSEPP). The SSEPP guides all activity and response during a system emergency or community event.

Sun Metro maintains Facility Emergency Plans for the following:

- Building Evacuation – General
- Fire
- Medical Emergencies
- Elevator Emergencies
- Bomb threats
- Biohazards or suspicious items
- Hazardous Materials Spills
- Workplace violence

- Other emergency conditions

7.2 Responsibilities for Emergency Preparedness

Sun Metro has adopted the Incident Command System (ICS) structure to respond to and manage an emergency event. The ICS's Primary and Secondary Management functions and responsibilities are shown below.

ICS Management Functions

ICS Management Function	Responsible Party
Command	Assistant Director of Streetcar Operations
Safety & Security	Streetcar Safety Manager, Chief Safety Officer, or SMS Executive.
Operations	Streetcar Operation Superintendent or Transit Supervisor
Technology	Sun Metro IT
Planning	Sun Metro Planning
Logistics	Streetcar Operation Superintendent or Transit Supervisor
Finance	Chief Financial Officer and Accountable Executive
Public Information	Sun Metro Marketing and City PIO

7.2.1 Crisis Communications Plan

A crisis is a sudden, unexpected event or set of circumstances that requires immediate action. For this reason, Sun Metro has a Crisis Communications Plan that allows the organization to deal with each situation at hand and be prepared to communicate under crisis conditions. The Crisis Communications Plan allows the organization to go from a position of response and reaction to one of relative control.

A key step in preparing for a crisis is selecting a team of employees who formulate and implement Sun Metro's response. The Crisis Communications Team assumes responsibility for handling the response so that other employees can maintain normal functions of the office with as few disruptions as possible.

Below are the core team members responsible for formulating Sun Metro messages during a crisis:

- Mass Transit Director – Sun Metro
- Sun Metro's Assistant Director of Operations
- Mass Transit Chief Safety Officer or SMS Executive
- Safety Managers by Mode
- Sun Metro Manager by mode
- *Others are notified depending on the severity of the crisis

7.3 Coordinated Schedule

7.3.1 Interdepartmental / Interagency Coordination

Sun Metro's Managing Director, Chief Safety Officer, or SMS Executive, and Department Managers will coordinate the schedule for emergency preparedness exercises; development of After-Action Reports and implementation of findings; procedure development, and training with the stakeholder agencies.

In the table below are the major federal, state, and local agencies and their primary responsibility to Sun Metro's safety and emergency preparedness.

Table 9: Federal, State, and Local Agencies' Primary Responsibilities

Agency	Reporting	Oversight	Support	Policy
Federal Transit Administration	X	X	X	X
Texas Department of Transportation	X	X	X	X
Transportation Security Agency	X	X	X	X
Department of Homeland Security		X	X	
El Paso Police Department	X		X	
El Paso Fire Department	X		X	
Emergency Management Office	X		X	
• El Paso Public Works	•	•	X	•
• City Attorney's Office	•	•	X	•

7.4 Emergency Drills and Exercises

Sun Metro, EPSC/ FLSC conducts or participates in a minimum of one Full Scale Exercise (FSE) or Tabletop Exercise (TTX) annually. Community first responders, including the El Paso Fire Department, El Paso Police Department, local FBI, TxDOT, and El Paso Emergency Management, may assist the transit system in planning, coordinating, and training to prepare for the drills and Exercises.

Detailed scenarios are developed by the participants' management to ensure that the exercises are realistic, comprehensive, and effectively evaluate the emergency preparedness of the participants. Observers are assigned to each participant group to evaluate the effectiveness of the response to the exercise scenario.

After actual safety events, there is an assessment to return the system to 100% functionality in the shortest time possible. All divisions are responsible for executing this plan. The purpose of this phase is to make certain that all areas have been addressed appropriately and Sun Metro can sustain operations indefinitely. This phase is a self-assessment to determine ways to improve our processes and procedures and update all disaster-related plans. The following are examples of items that will be reviewed during this process:

- Division managers will provide the records to support all expenses associated with the emergency.

- Each division will provide an update on the status of personnel, equipment, and facilities.
- Division managers should provide a list of proposed changes to the comprehensive System Security & Emergency Preparedness Plan (SSEPP) to Sun Metro's Safety Managers.
- Division managers should follow the SSEPP to achieve 100% functionality in their assigned area.
- Division managers will identify any shortfalls or limiting factors that will prevent them from achieving 100% functionality.
- Emergency supplies and equipment used during an emergency will be replenished.

Immediately after the completion of an exercise, the participants will debrief and discuss the observations made during the exercise. An after-action report is prepared and distributed to the participants for follow-up with each participant group. The after-action report is used to determine the need for modifications to plans, procedures, and processes. The Sun Metro FLSC performs follow-up with all participant groups to develop a coordinated schedule for the implementation of corrective actions for the closure of identified after-action items. These corrective actions will be submitted to TxDOT and included in the Corrective Action Plan. The Chief Safety Officer or SMS Executive and the corresponding safety manager will be responsible for the implementation of these CAPs.

7.5 Emergency Procedures

Emergency Response Procedures are reviewed and revised in accordance with Sun Metro Plans, Manuals, Policies, and Procedures. This procedure stipulates control and distribution, including the three-year review process. The length of time needed for the review may vary based on the document being reviewed, but the review should not exceed 30 days.

7.5.1 Emergency Preparedness Training

Employees receive emergency training during their initial indoctrinations. In addition, all employees receive training to respond to specific emergencies in accordance with the appropriate Standard Operating Procedures.

7.6 Familiarization Training

All fire department personnel have been provided familiarity training on Sun Metro buses and the streetcar system. All new fire department and emergency medical department recruits are provided with classroom training and hands-on training on emergency preparedness for the Sun Metro system. The Safety and Security Division provided train-the-trainer instruction.

8 Risk-Base Inspections

On November 15, 2021, President Biden signed the Bipartisan Infrastructure Law (BIL), enacted as the Infrastructure Investment and Jobs Act (IIJA), which continues the public transportation safety program. The BIL amended 49 U.S.C § 5329 to require state safety

oversight agencies (SSOAs) to conduct risk-based inspections (RBI) of the rail transit agencies (RTAs) they oversee. Additionally, the BIL directed the Federal Transit Administration (FTA) to issue a Special Directive to each SSOA on developing and implementing risk-based inspection programs.

On October 21, 2022, the FTA issued Special Directive 22-47, under the authority of 49 U.S.C. § 5329 (k) and 49 CFR Part 670, requiring the Texas Department of Transportation (TxDOT), as the SSOA, to develop and implement a risk-based inspection program utilizing qualitative and quantitative data analysis to prioritize inspections addressing safety concerns and hazards associated with rail transit agency safety risks.

Special Directive 22-47 mandates that TxDOT have an FTA-approved risk-based inspection program by October 2024. Through the RBI Toolkit, the FTA requires SSOAs to submit their risk-based inspection programs for FTA review and approval by May 2024.

To meet this deadline, TxDOT, in consultation with each rail agency within the SSO Program, began developing a risk-based inspection program in April 2023. TxDOT SSO and rail agencies have continued to coordinate the development of the RBI program throughout 2023 and 2024 via onsite visits, conference calls, emails, and document reviews.

The Risk-Based Inspection Program documents TxDOT SSO's policies and procedures addressing TxDOT's authority and capability to enter and conduct inspections of the rail agencies, including both scheduled and unscheduled inspections. These policies and procedures also cover inspection access and data collection from each RTA to support risk-based inspection monitoring and prioritization activities, including the data the RTA collects when identifying and evaluating safety risks.

TxDOT will submit the risk-based inspection program to the FTA by May 2024. The RBI Program will be reviewed annually as part of the Program Standard update process and updated if necessary.

El Paso Streetcar (EPSC), in consultation and coordination with TxDOT, began developing the risk-based inspection program in April 2023. EPSC and TxDOT have continued RBI-related consultation and coordination throughout 2023 and 2024 via onsite visits, conference calls, emails, and documentation reviews.

The TxDOT SSO RBI Program outlines TxDOT's authority to assess rail agency property and conduct inspections, including access for both scheduled and unscheduled inspections. Additionally, the RBI Program details the policies and procedures for conducting these inspections.

Upon FTA approval of the TxDOT SSO RBI Program, EPSC will formally adopt and incorporate the RBI Program into the Public Transportation Agency Safety Plan (PTASP) as Appendix D.

Risk-Based Inspections evaluate compliance with roadway worker protections through:

- Field inspections of work zones
- Verification of redundant protections
- RWIC qualification validation
- PPE usage assessments
- Communication logs between RWIC and OCC
- Track condition hazards affecting roadway workers
- Post-work site restoration checks
- Review of job safety briefing documentation

Inspections are prioritized based on:

- Time of day
- Type of work
- Traffic volume
- Historical safety performance
- Near-miss data

All findings must be included in the Safety Inspection Log and reviewed as part of Safety Assurance processes.

The RBI Program will be reviewed annually as part of the PTASP update process.

Appendices

A. Mass Transit Department Board Approval Resolution

B. TxDOT Approval Letter

C. Configuration Management Plan

D. Risk-Base Inspections



Legislation Text

File #: 26-0031, **Version:** 1

**CITY OF EL PASO, TEXAS
LEGISTAR AGENDA ITEM SUMMARY FORM**

DISTRICT, DEPARTMENT, CONTACT INFORMATION:

*Please choose District and Department from drop down menu. Please post exactly as example below.
No Title's, No emails. Please use ARIAL 10 Font.*

All Districts

Sun Metro Mass Transit, Anthony R. DeKeyzer, (915) 212-3306

AGENDA LANGUAGE:

This is the language that will be posted to the agenda. Please use ARIAL 11 Font.

Operational update on the Mass Transit Department Sun Metro.

**CITY OF EL PASO, TEXAS
AGENDA ITEM
DEPARTMENT HEAD'S SUMMARY FORM**



DEPARTMENT: Mass Transit Department, Sun Metro

AGENDA DATE: 01/06/2026

PUBLIC HEARING DATE:

CONTACT PERSON NAME: Anthony DeKeyzer

PHONE NUMBER: 1-915-212-3306

2nd CONTACT PERSON NAME:

PHONE NUMBER:

DISTRICT(S) AFFECTED: All

STRATEGIC GOAL:

No. 7. Enhance and Sustain El Paso's Infrastructure Network

SUBGOAL:

7.3. - Enhance regional transportation system.

SUBJECT:

Operational update on the Mass Transit Department Sun Metro.

COMMUNITY AND STAKEHOLDER OUTREACH:

PRIOR COUNCIL ACTION:

AMOUNT AND SOURCE OF FUNDING:

REPORTING OF CONTRIBUTION OR DONATION TO CITY COUNCIL:

NAME	AMOUNT (\$)

*****REQUIRED AUTHORIZATION*****

DEPARTMENT HEAD:

Jerry DeMuro

Digitally signed by Jerry DeMuro
Date: 2025.12.05 16:27:03 -07'00'

(If Department Head Summary Form is initiated by Purchasing, client department should sign also)



CITY OF EL PASO

Sun Metro Update

January 6, 2026

Strategic Goal: 7 Enhance & Sustain El Paso's Infrastructure Network

Sub Goal: 7.3 Enhance a Regional Comprehensive Transportation System

The Mission of Sun Metro is to connect our El Paso community through high-quality transit services.

Sun Metro recognizes that serving the public is our reason for existing and will strive to do whatever possible to assure our public a pleasant experience.

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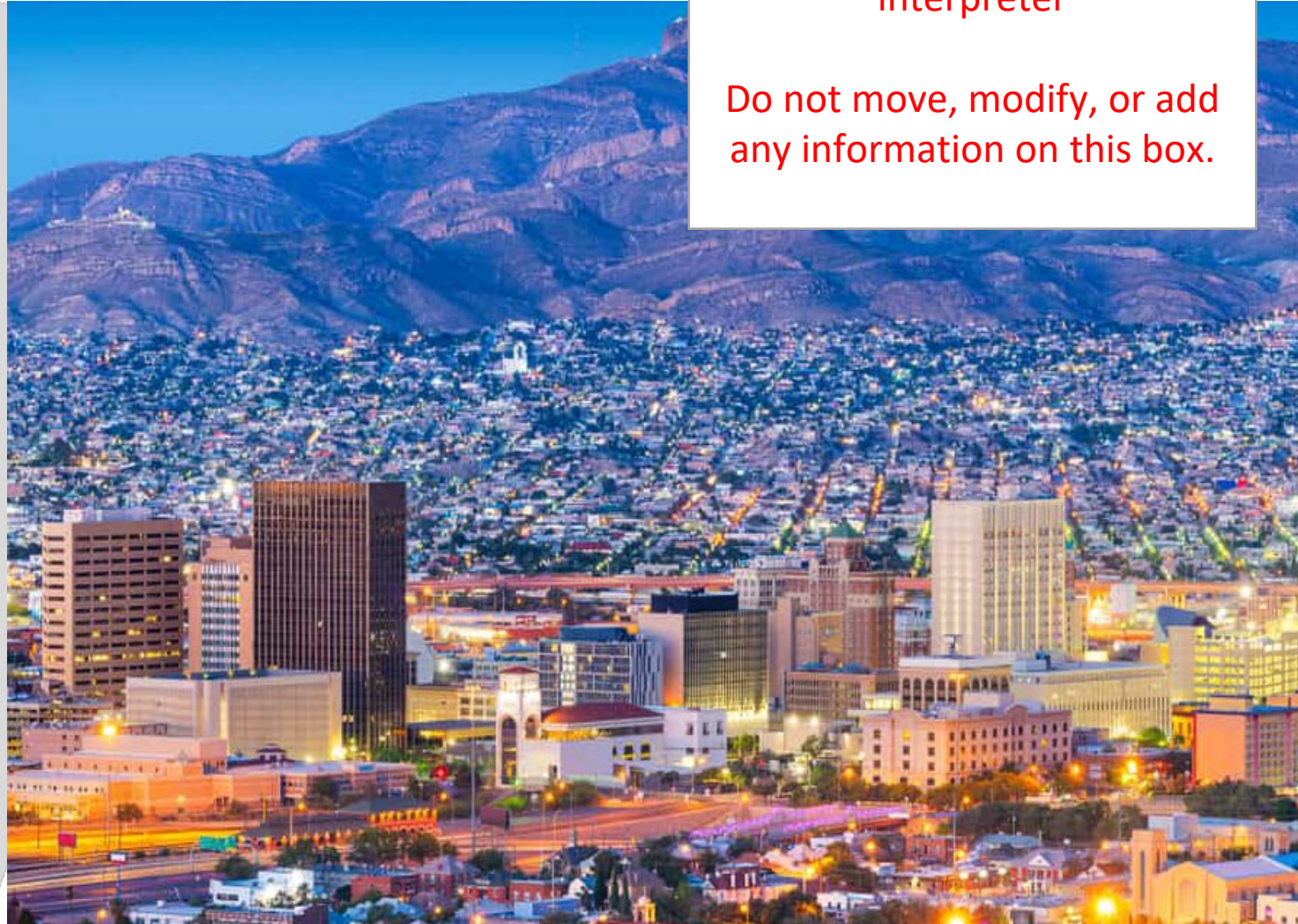


Agenda:

- Department Update
 - Finance
 - Fixed Route
 - LIFT
 - Streetcar
 - Safety
 - Fleet
 - HR
 - Customer Service
 - Additional Focus Areas

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Finance Performance

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- Long-Term Financial Stability
 - **Fund Balance increased by \$11.3 million in FY25**
 - **Fund Balance is “projected” to increase another \$8 million**
in the following 3 years as we closely monitor:
 - Internal Contract Review (**1.8 Million FY 2025**)
 - Bus Purchase Plan
 - Discretionary Grants (**2.4 million FY 2025**)
 - Review of Sun Metro Revenue Generating Programs
 - **Budget decrease of \$5.8 million for FY26**
 - No increase in fares and absorbed salary increases & inflationary pressures

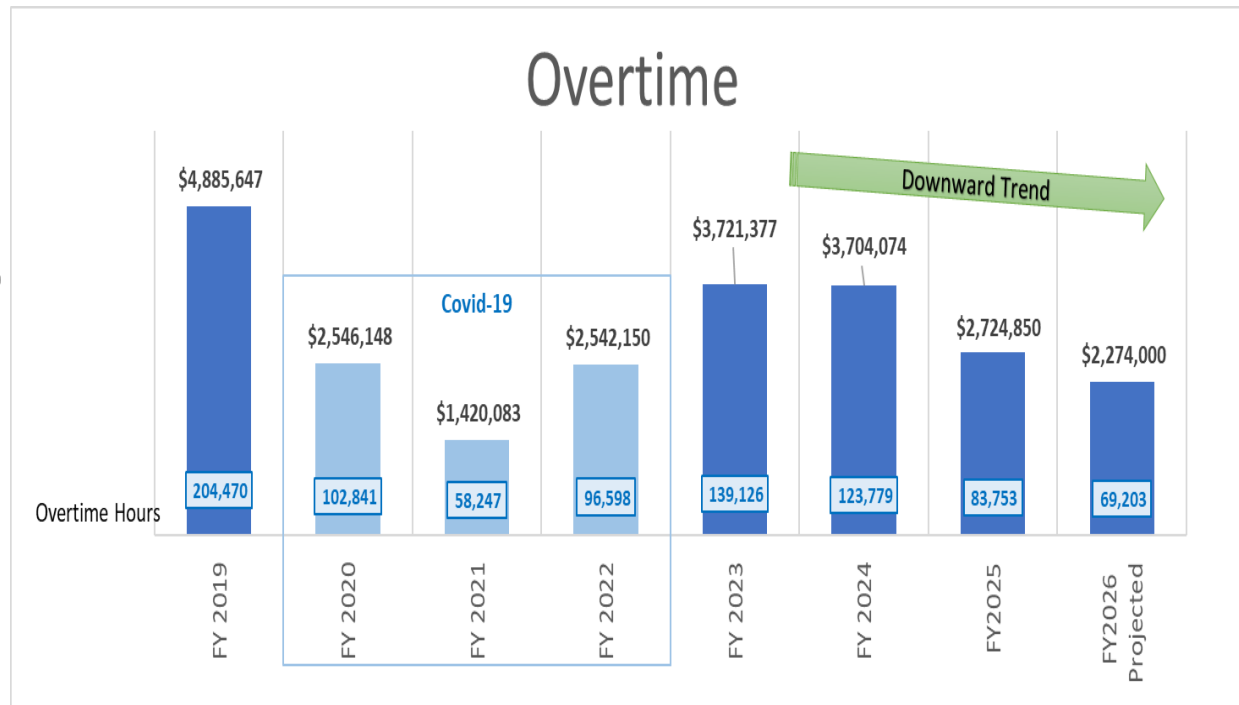


Financial Performance

- In **FY25 Overtime decreased \$979,224**
 - Projected to reduced by another \$450,850 in FY26
- Strict oversight and review of Overtime
 - **Saving of \$2.61 million since COVID**
- Procedures
 - Optimize Sign-ups with Extra-board Drivers
 - Increased number of Filled FTEs

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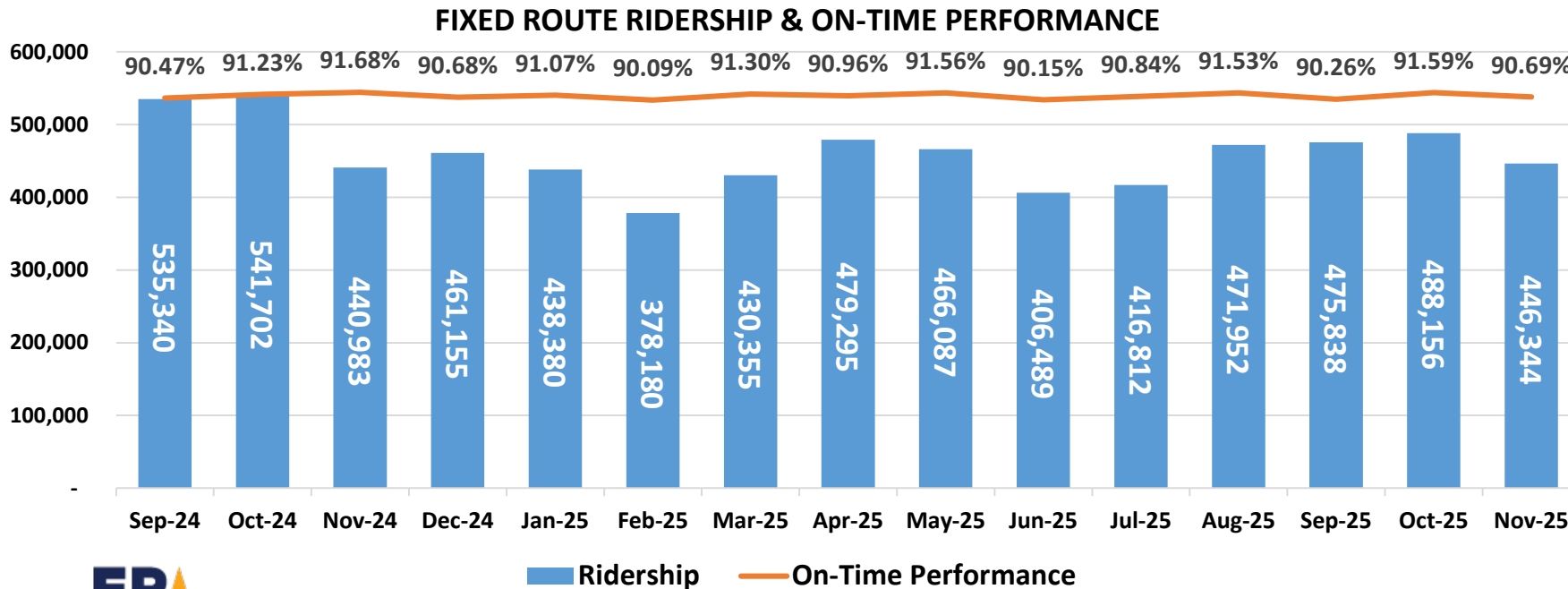


Fixed Route

- Monthly OTP Average: **91%**
- Monthly Ridership Average: **455,561**
- OTP = 100+ buses within a 10 min window at 8 terminals, 2,349 stops, covering 258 sq miles from 4:10 AM to 10:30 PM.

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LIFT Operations

On-Time Performance: Picking up or dropping off a passenger within a 30-minute window

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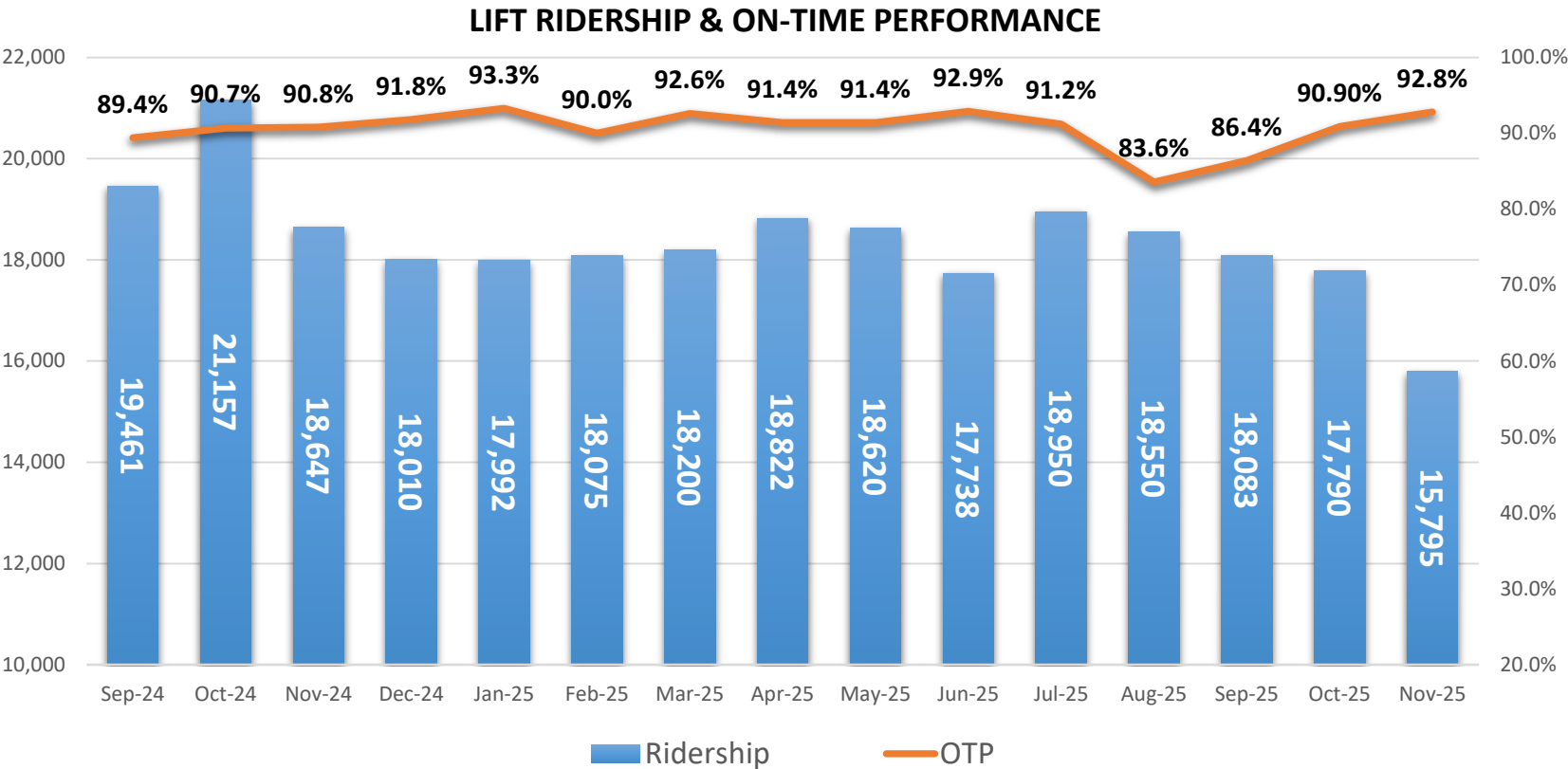
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Average OTP:

- FY2026: 90.1%
- FY2025: 90.8%
- FY2024: 89.6%

Average Ridership:

- FY2026: 17,223
- FY2025: 18,370
- FY2024: 17,856



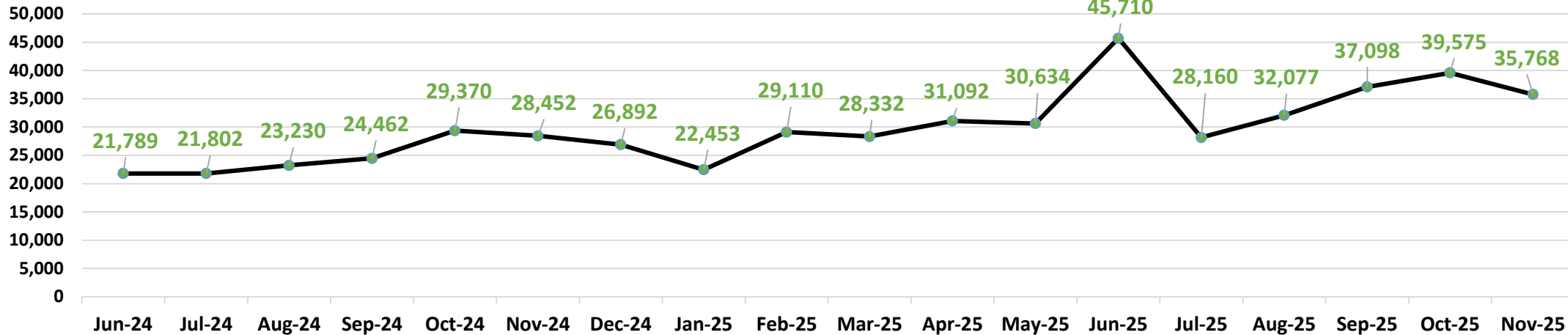
Streetcar Ridership Increases

- FY25 average ridership increased 9,705 riders per month
 - FY24 Total = 240,289 Riders / **increase of 168.6%**
 - FY25 Total = 356,744 Riders / **increase 48.5%**
- **FY25 Actual Cost: \$2.77M**
 - **\$520,000 less than Projected Cost of \$3.29M**
 - FY26 1st Quarter Expense \$750K = 25% of \$3.3M Budget

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RIDERSHIP

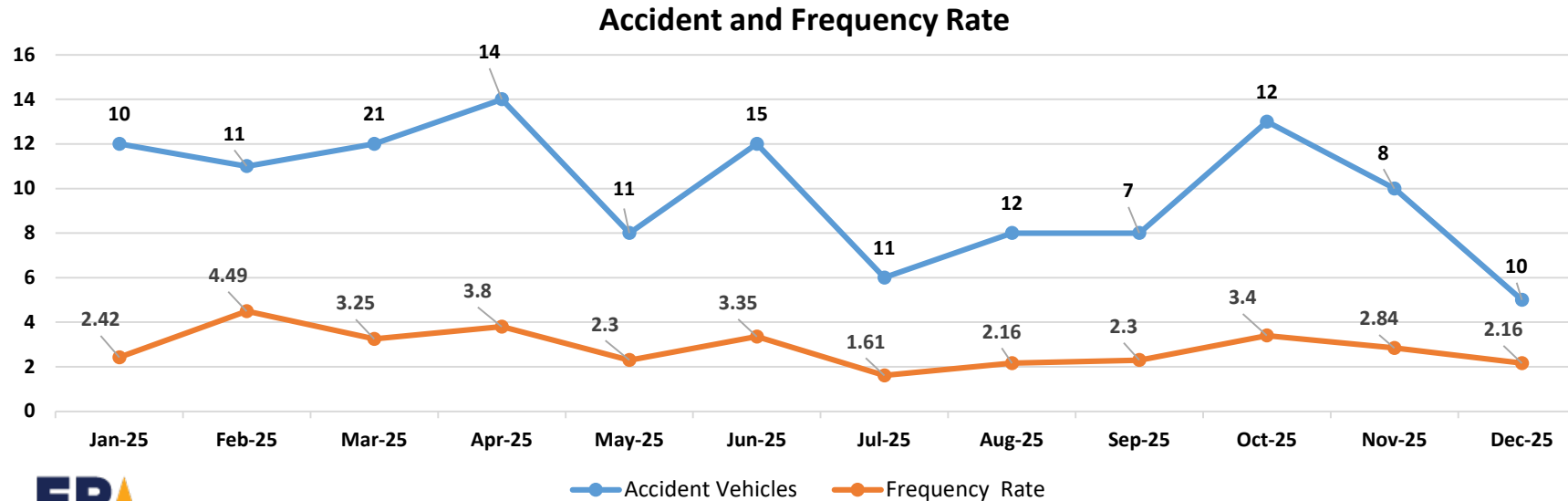


Safety

- Fixed Route Operational Miles Per Year: 4.5 Million
 - Preventable accidents decreased by: 17%
 - Total Accidents have decreased 13%
 - Average accidents per month 2024: 12
 - Average accidents per month 2025: 10.5
 - Accident Frequency Rate (per 100,000 miles) has increased by .7

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Fleet Replacement & Performance

- **Fixed Route Replacements: 72 New Buses by FY 2027:**
 - FY 2024: 10 Buses Received
 - FY 2025: 20 Buses Received
 - FY 2026: 10 Buses Ordered
 - FY 2026: 32 Buses Ordered
 - **All Buses will be within the 14-year LIFECYCLE!!!!**
 - **FIRST TIME IN 20+ YEARS!!!**
- **Paratransit Replacements: 64 New Vehicles by FY 2026:**
 - FY 2025: 6 Cutaways Received
13 Cutaways Ordered
 - FY 2026: 45 Electric Vehicles Received

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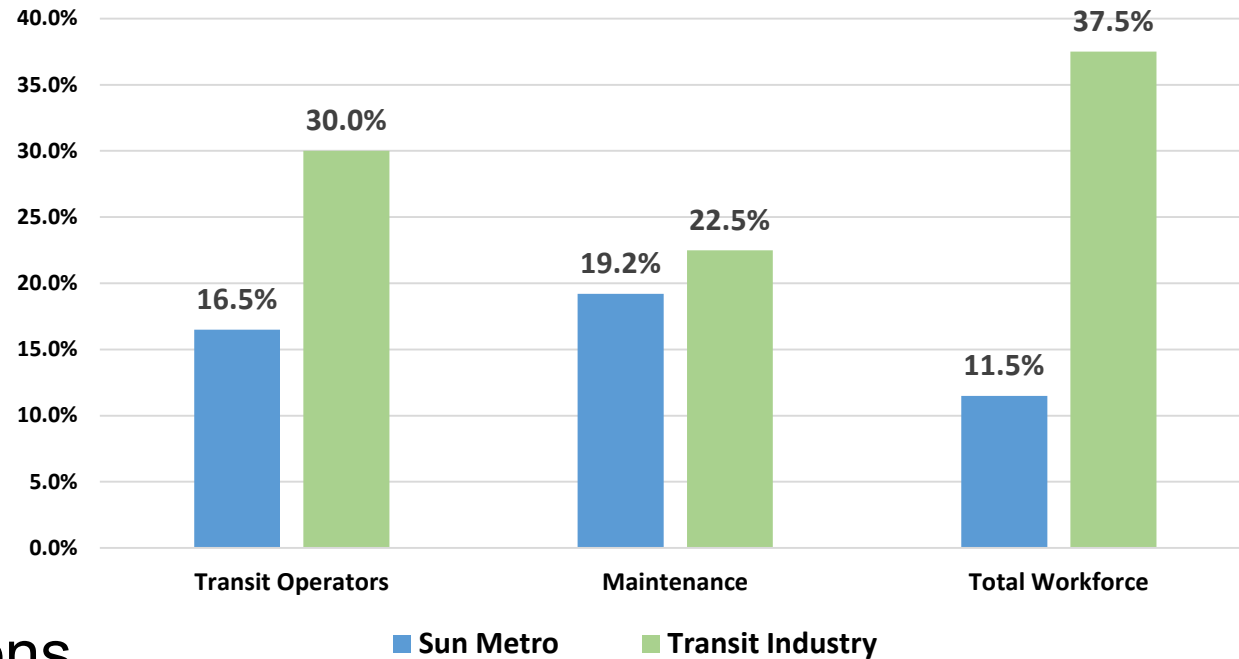
Human Resource Initiatives

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- **Total FTEs: 625**
 - Positions filled: 535
 - **Decreased Vacancies by 3.6% in FY 2025**
 - Vacancy Rate is 16.7%
- **Turnover Rate:**
 - Transit Operator – 16.5%
 - Fleet Maintenance – 19.2%
 - Overall - 11.5%
- **Training Initiatives:**
 - 91% Mandatory Completion Rate
 - 94% EEO & Title VI Completion Rate
- **Policy & Compliance:**
 - Updated Sun Metro Rules & Regulations

Turnover Rate Comparison



Fixed Route Customer Service

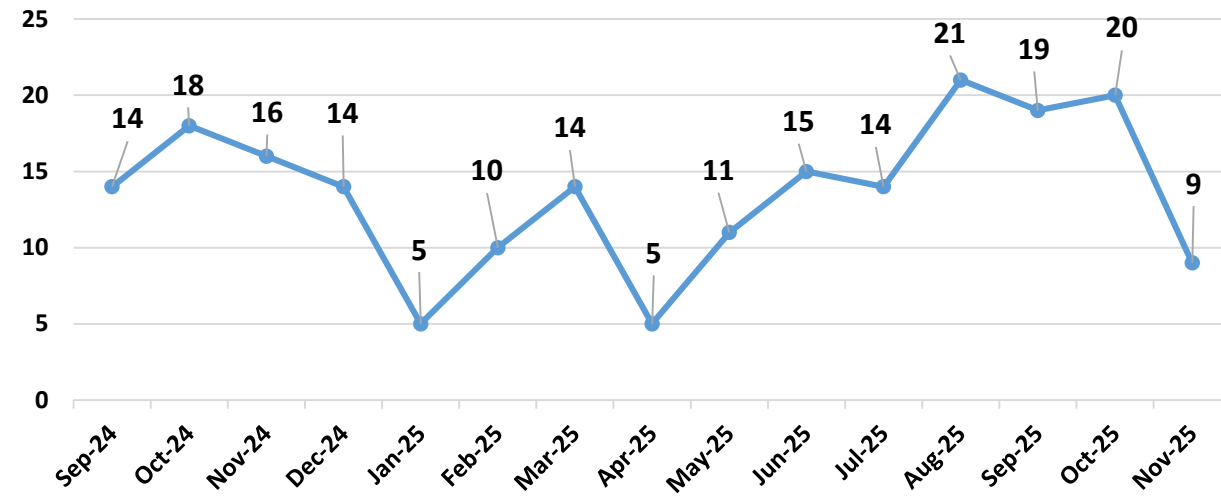
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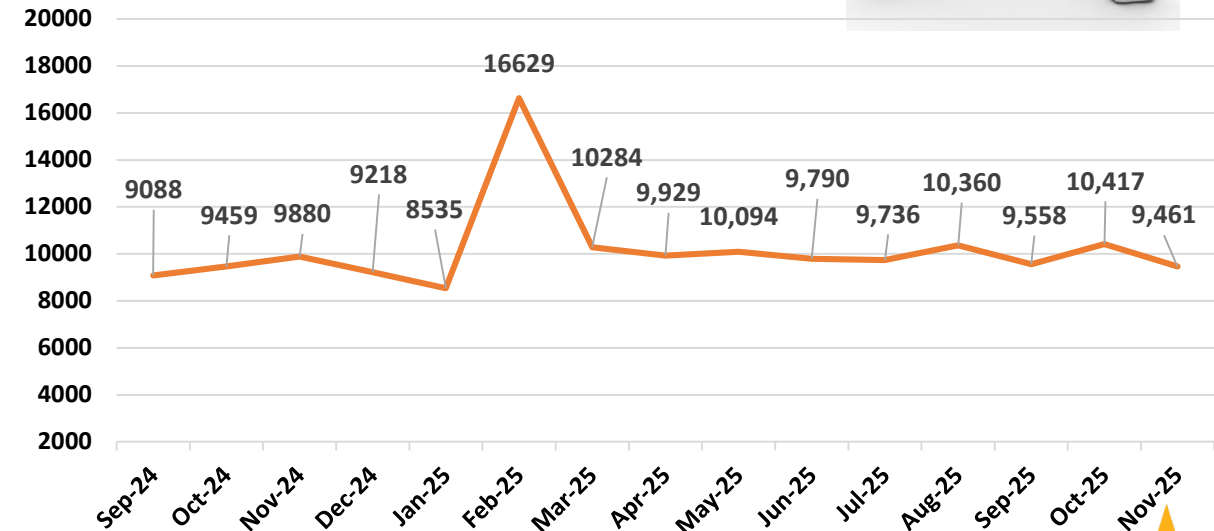
- Monthly valid operational complaints **decreased 7.1%** in FY25
 - Top Concerns - Schedule Adherence and Route Disruptions
- Monthly Customer Service Average Calls increased **15.27%** in FY25
 - Top Inquires - Route Schedules and Route Adjustments



Valid Operational Complaints



Calls

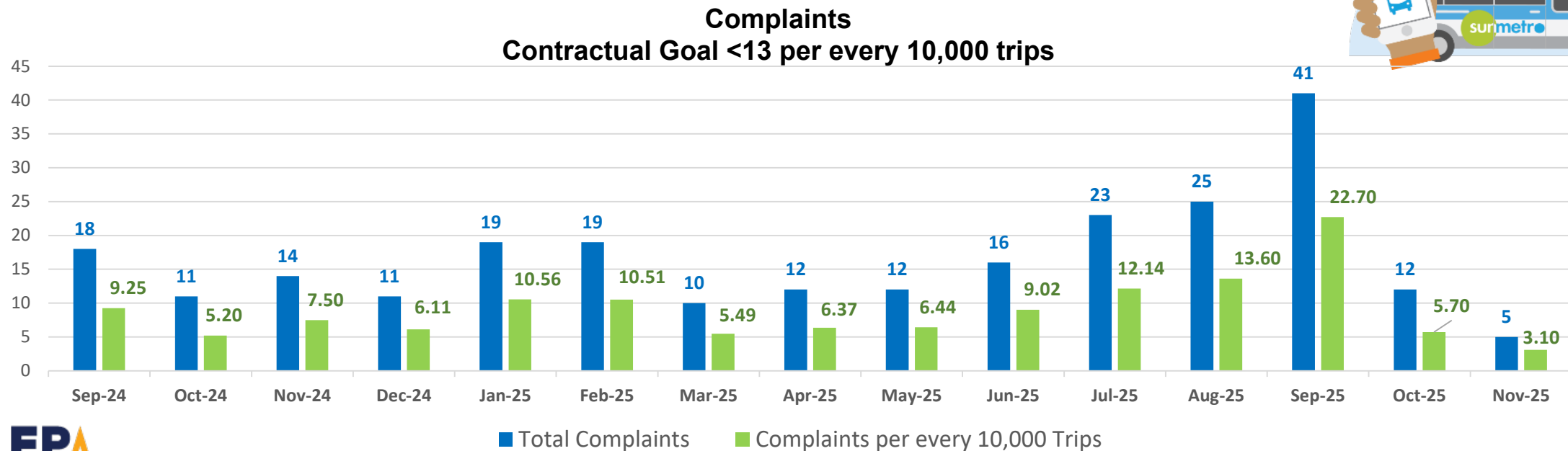


LIFT Customer Service

- Monthly valid operational complaints decreased by **60.41%** FY24 and **15.8%** from FY25:
 - Top concerns – Pick up delays
- Monthly Positive Commendations Calls average 13 in FY2025

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Additional Focus Areas

- Sun Metro Rising:
 - Curb Cuts: 27 priority cuts required
 - Completed December 2025
 - Equity Analysis Timeline:
 - Completed Fall 2025
 - Implementation Date: June 2026
- Paratransit:
 - Mixed fleet in 2025 – CNG, Gas & Electric
 - EV Charging Stations Completion date - January 2026
 - 45 EV Vehicles on Station - December 2025

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Additional Focus Areas (Cont.)

- Ft. Bliss Micro Transit:
 - \$4.1 Million allocated for Pilot Program
 - Interlocal Agreement is under review
- Greyhound Station:
 - Location UPTT
 - Lease and Transit License under review

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Mission

Deliver exceptional services to support a high quality of life and place for our community

Values

Integrity, **R**espect, **E**xcellence,
Accountability, **P**eople

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Vision

Develop a vibrant regional economy, safe and beautiful neighborhoods and exceptional recreational, cultural and educational opportunities powered by a high performing government



Sun Metro Update

January 6, 2026

Strategic Goal: 7 Enhance & Sustain El Paso's Infrastructure Network
Sub Goal: 7.3 Enhance a Regional Comprehensive Transportation System

☆ Valores

Integridad, **R**espeto, **E**xcelencia,
Responsabilidad, **P**ersonas



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Visión

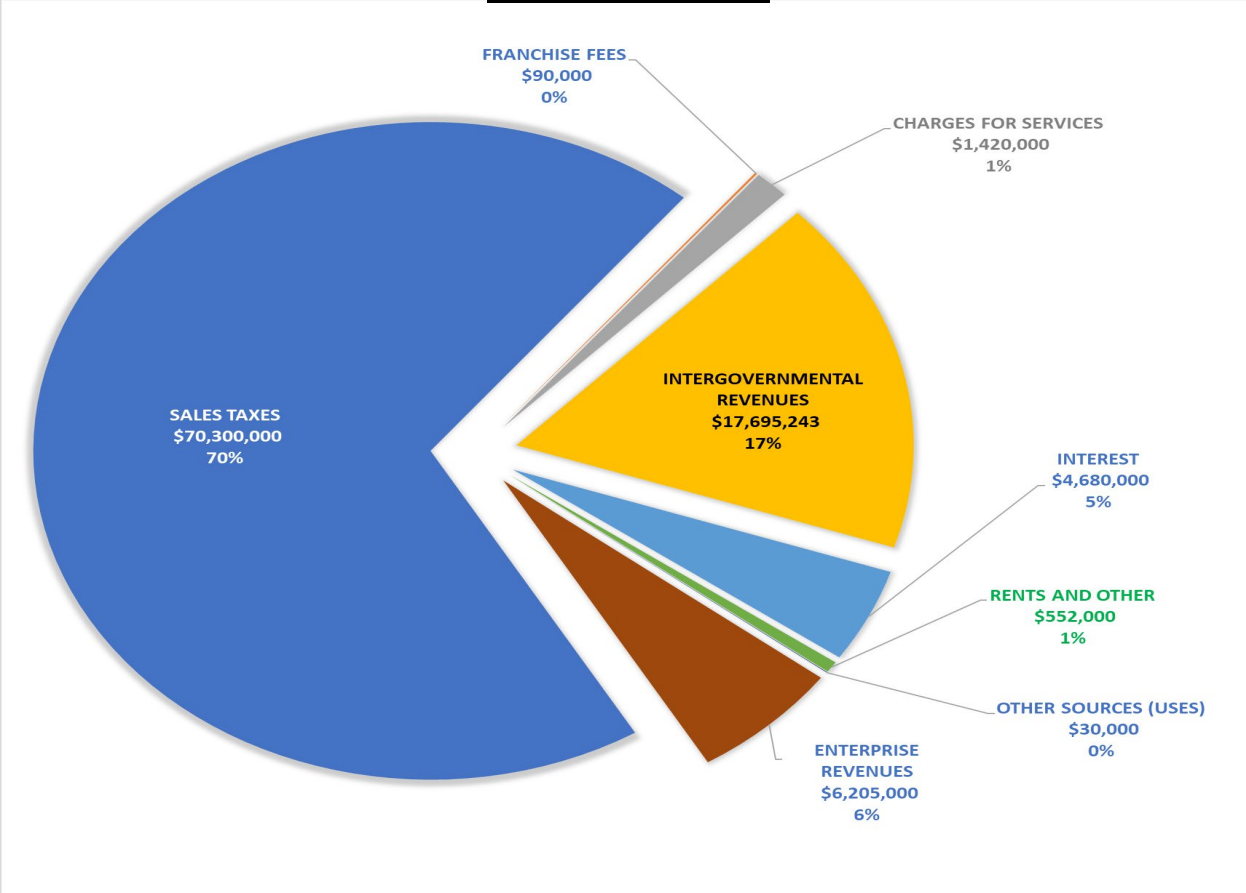
Desarrollar una economía
regional vibrante, vecindarios
seguros y hermosos y oportunidades
recreativas, culturales y educativas
excepcionales impulsadas por un
gobierno de alto desempeño

Revenues & Expenses

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REVENUES



EXPENSES

