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

DEPARTMENT: Mass Transit Department - Sun Metro

AGENDA DATE: 2/4/25

PUBLIC HEARING DATE:

CONTACT PERSON NAME: Anthony DeKeyzer **PHONE NUMBER:** 1-915-212-3306

DISTRICT(S) AFFECTED: All

STRATEGIC GOAL:

7. Enhance & Sustain El Paso's Infrastructure Network Enhance a regional comprehensive transportation system

SUBGOAL:

7.3 Enhance a regional comprehensive transportation system

SUBJECT:

Discussion and action 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.

BACKGROUND / DISCUSSION:

The Safety Plan is reviewed and updated annually and more often as needed.

COMMUNITY AND STAKEHOLDER OUTREACH:

NA

PRIOR COUNCIL ACTION:

Revision 4 of the Sun Metro Agency Safety Plan was approved by Mass Transit Department Board on December 5, 2023.

AMOUNT AND SOURCE OF FUNDING:

NA

REPORTING OF CONTRIBUTION OR DONATION TO CITY COUNCIL:

NA

NAME	AMOUNT ($)

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

DEPARTMENT HEAD: Jerry DeMuro Digitally signed by Jerry DeMuro Date: 2025.01.13 09:15:09 -07'00'

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

RESOLUTION

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

The Sun Metro Agency Safety Plan attached to this resolution as Attachment "A" is approved and adopted. 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, 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 Sun Metro Agency Safety Plan. Further, to the extent allowed by law that the City Manager is authorized to make any changes to the Sun Metro Agency Safety Plan.

APPROVED this _____ day of _____, 2025.

MASS TRANSIT BOARD:

ATTEST:

_____
Renard U. Johnson, Chairman

_____
Laura D. Prine, Secretary

APPROVED AS TO FORM:

_____
Joyce Garcia
Assistant City Attorney

APPROVED AS TO CONTENT:

Anthony R. Dekeyzer
_____
Anthony DeKeyzer
Director of Mass Transit

(Attachment "A" on the following pages)

ATTACHMENT A

Sun Metro Agency Safety Plan

Redline Version
Revision 5
October 1, 2024

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		1-24-2025
Reviewed By	**Signature**	**Date**
Esteban Perea, TSSP-Bus, WSO-CSM Transit Safety Manager, Sun Metro		1-24-2025
Jose Alvarez Sun Metro LIFT Safety & Operations Manager		1-24-2025
Felix Minjarez Jr., TSSP, PTSCTP – Bus/Rail Transit Superintendent of Operations, Streetcar		1-24-25
Robert Dominguez Transit Superintendent of Operations, Sun Metro		1.24.25
Everett Esparza, TSSP-Rail Chief Streetcar Officer		1/24/25
Danny Meza Fleet Maintenance Manager		1-24-25
Nick Ferriola, TSSP, PTSCTP - Bus/Rail Transit Safety & Security Officer		1/24/2025
Dwayne T. Arnold., TSSP, PTSCTP, Bus/Rail Assistant Director of Transit Operations – Interim		1/24/2025
Jerry DeMuro, Deputy Transit Officer		1/24/25
Approved By	**Signature**	**Date**
Anthony R. DeKeyzer Director of Mass Transit – Sun Metro (Accountable Executive)		1/24/25

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	1-23-2025
	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, 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
		Added new Upper Eastside Transfer Center	Page 16
		Performance Measures – removed projected	Pages 22-23

Date	Revision	Description of Change	Section or Page
		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 Tittles 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
		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

Date	Revision	Description of Change	Section or Page
		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
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 the Route 84 from sun Metro Service and added information on the Brio information board status	Page 22 - 24

Date	Revision	Description of Change	Section or Page
		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
		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

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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 pf records and related materials, including ,but not limited to, those related t 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 chief executive officer, 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 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 view 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** mean:
    (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 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. **Equivalent entity** means an entity that carries out duties similar to that 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 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 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 conducts 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 (Survives 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, organizational, 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 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 of the injury was received;
    (2) Results in a fracture of any bone (except simple fractures of fingers, toes, or noses);
    (3) Causes severe hemorrhages, nerve, muscle, or tendon damage;
    (4) Involves any internal organ; or

    Involves 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 set forth 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	Center 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 21st 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 *also see NPTSP*
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	Preventative Maintenance
PMI	Preventative Maintenance Inspection
PMMS	Preventative 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 *also see MSDS*
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 State 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 and one county Route. 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 four-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:

Brio Roadway and TOD Stations

- 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

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 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

Any change or modification to the rail system has the potential to affect passenger and/or employee safety, therefore any change or modification to the rail system will be a reason to review and update the Sun Metro PTASP. Changes to the system in the revenue service period will be conducted in accordance with TxDOT, and Sun Metro policies.

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.
- 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 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 it:

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

All employees and contractors are charged with responsibility for the safety of passengers, employees, property, and those who come in contact with our systems. In addition, ALL employees are accountable for the safety performance of Sun Metro.

Specific accountability for safety performance rests with those responsible for the management of each transit mode operated under Sun Metro.

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 emergency situations

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	**Signature**	**Date**
Anthony R. DeKeyzer (Accountable Executive)		1-24-25

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**
Measure 1a – Major Events	This includes all safety and security major events as defined by the NTD.
Measure 1b – Major Event Rate.	This includes all safety and security major events as defined by the NTD, divided by VRM.
Measure 1.1 – Collision Rate (new)	This includes all collisions reported to the NTD, divided by VRM.
Measure 1.1.1 – Pedestrian Collision Rate (new)	This includes all collisions "with a person," as defined by the NTD, divided by VRM.
Measure 1.1.2 – Vehicular Collision Rate (new)	This includes all collisions "with a motor vehicle," as defined by the NTD, divided by VRM.
Measure 2a – Fatalities	This includes all fatalities as defined by the NTD.
Measure 2b – Fatality Rate	This includes all fatalities as defined by the NTD, divided by VRM.
Measure 2.1 – Transit Worker Fatality Rate (new)	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.
Measure 3a – Injuries	This includes all injuries as defined by the NTD.
Measure 3b – Injury Rate.	This includes all injuries as defined by the NTD, divided by VRM.

Safety Performance Measure	Description
Measure 3.1 – Transit Worker Injury Rate (new)	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.
Measure 4a – Assaults on Transit Workers (new)	This includes all assaults on transit workers as defined by the NTD.9
Measure 4b – Rate of Assaults on Transit Workers (new)	This includes all assaults on transit workers as defined by the NTD, divided by VRM.
Measure 5 – System Reliability	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 of 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 your 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 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,
- The weapon fired on 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 events 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 Year 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

Para Transit				
Fiscal Year				
Safety Performance Measures	**2022**	**2023**	**2024***	**2025**
Total Vehicle Revenue Miles	1708667	1994510	2371684	2513985
Major Events				
Major Events Total	3	3	5	2
Major Events Rate	0.1755	0.1504	0.2108	0.0795
Collision Total	33	24	32	27
Collision Rate	1.9313	1.2033	1.3492	1.0739
Pedestrian Collisions Total	0	0	1	0
Pedestrian Collision Rate	0	0	0.0421	0
Vehicular Collisions Total	13	16	18	11
Vehicular Collision Rate	0.642	0.687	0.614	0.437
Fatalities	**0**	**0**	**0**	**0**
Fatality Rate	0	0	0	0
Transit Worker Fatality Rate	0	0	0	0
Injuries	**0**	**4**	**3**	**2**
Injury Rate	0	5.36	3.13	2.34
Transit Worker Injury Rate				
Assaults in Transit Workers	**0**	**0**	**0**	**0**
Assaults on Transit Workers' Rate	0	0	0	0
System Reliability				

Sun Metro Fixed Route

Fixed Route Fiscal Year				
Safety Performance Measures	**2022**	**2023**	**2024***	**2025**
Total Vehicle Revenue Miles	5,132,203	5,712,826	5,589,182	5,478,070
Major Events				
Major Events Total	18	16	17	17
Major Events Rate	0.35	0.28	0.30	0.31
Collision Total	128	136	136	133
Collision Rate	2.49	2.38	2.43	2.42
Pedestrian Collisions Total	1	4	0	
Pedestrian Collision Rate	0	0	0	
Vehicular Collisions Total	102	103	96	301
Vehicular Collision Rate	1.99	1.80	1.72	1.00
Fatalities	**1**	**0**	**1**	**0**
Fatality Rate	0.02	0	0.01	0
Transit Worker Fatality Rate	0	0	0	0
	0	0	0	0
Injuries	**34**	**46**	**43**	**41**
Injury Rate	7.06	9.23	8.33	8.2
Transit Worker Injury Rate	5.81	6.82	6.82	6.48
Assaults in Transit Workers	**1**	**1**	**2**	**1**
Assaults on Transit Workers' Rate	0	0	0	0
System Reliability	139,500	238,000	189,244	240,000

Sun Metro El Paso Streetcar

Streetcar				
Fiscal Year				
Safety Performance Measures	**2022**	**2023**	**2024***	**2025**
Total Vehicle Revenue Miles	22,883	41,046	67,275	73,734
Major Events				
Major Events Total	1	1	0	0
Major Events Rate	0.22	0.12	0.00	0.00
Collision Total	5	8	26	13
Collision Rate	1.09	0.97	1.93	1.49
Pedestrian Collisions Total	0	0	0	0
Pedestrian Collision Rate	0.00	0.00	0.00	0.00
Vehicular Collisions Total	5	8	26	13
Vehicular Collision Rate	1.09	0.97	1.93	1.33
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	**0**	**3**	**1**	**1**
Injury Rate	0	11.53	3.84	8.4
Transit Worker Injury Rate	0	27.47	13.73	13.73
Assaults in Transit Workers	**0**	**0**	**1**	**0**
Assaults on Transit Workers' Rate	0.00	0.00	0.07	0.00
System Reliability	22,880	39,812	67,275	70,000

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 program 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, 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 sign 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 to discuss any safety issues, and is 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.

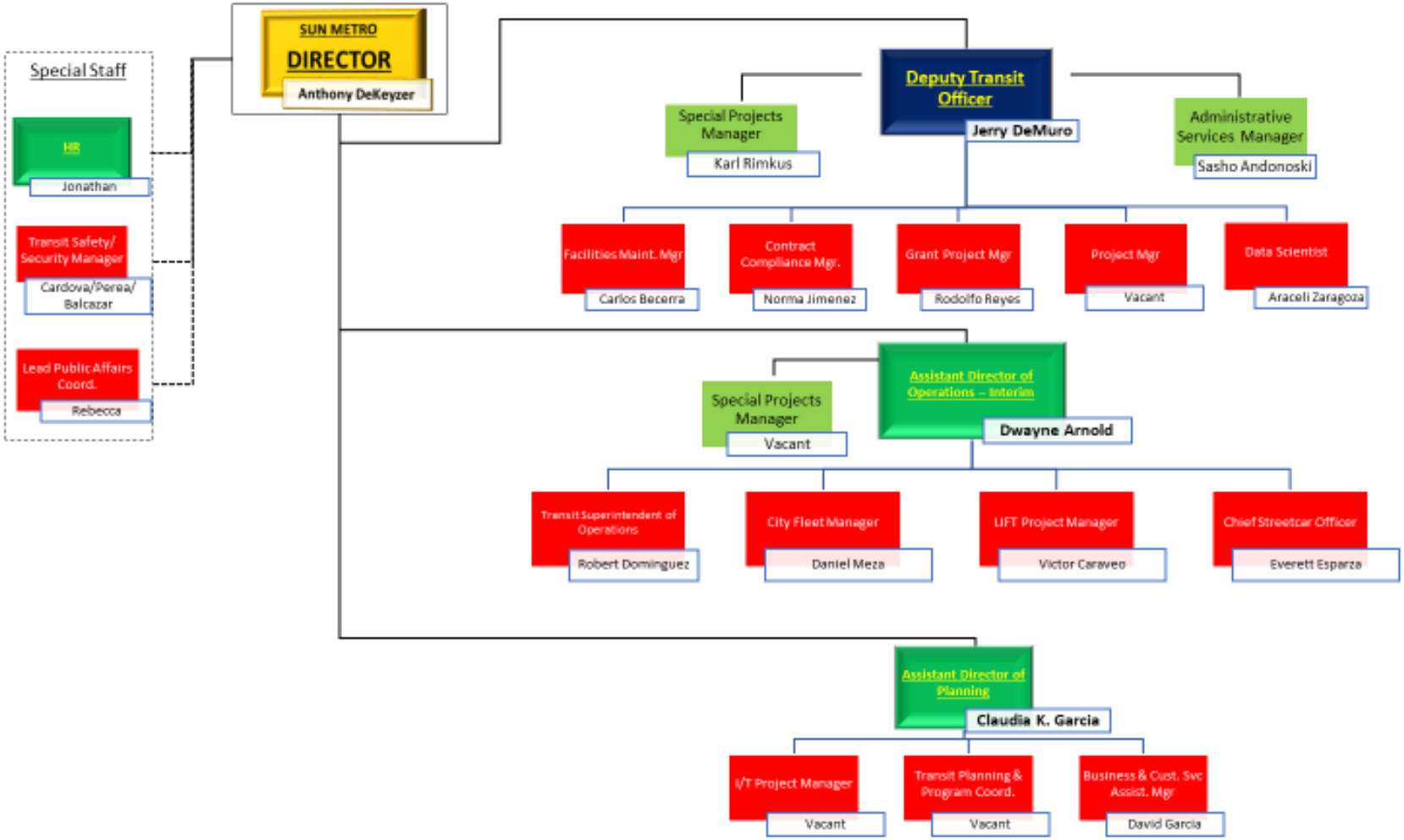
For Fiscal Year 2025, the Director of Sun Metro and the Accountable Executive will prioritize funding for safety-related projects based on:

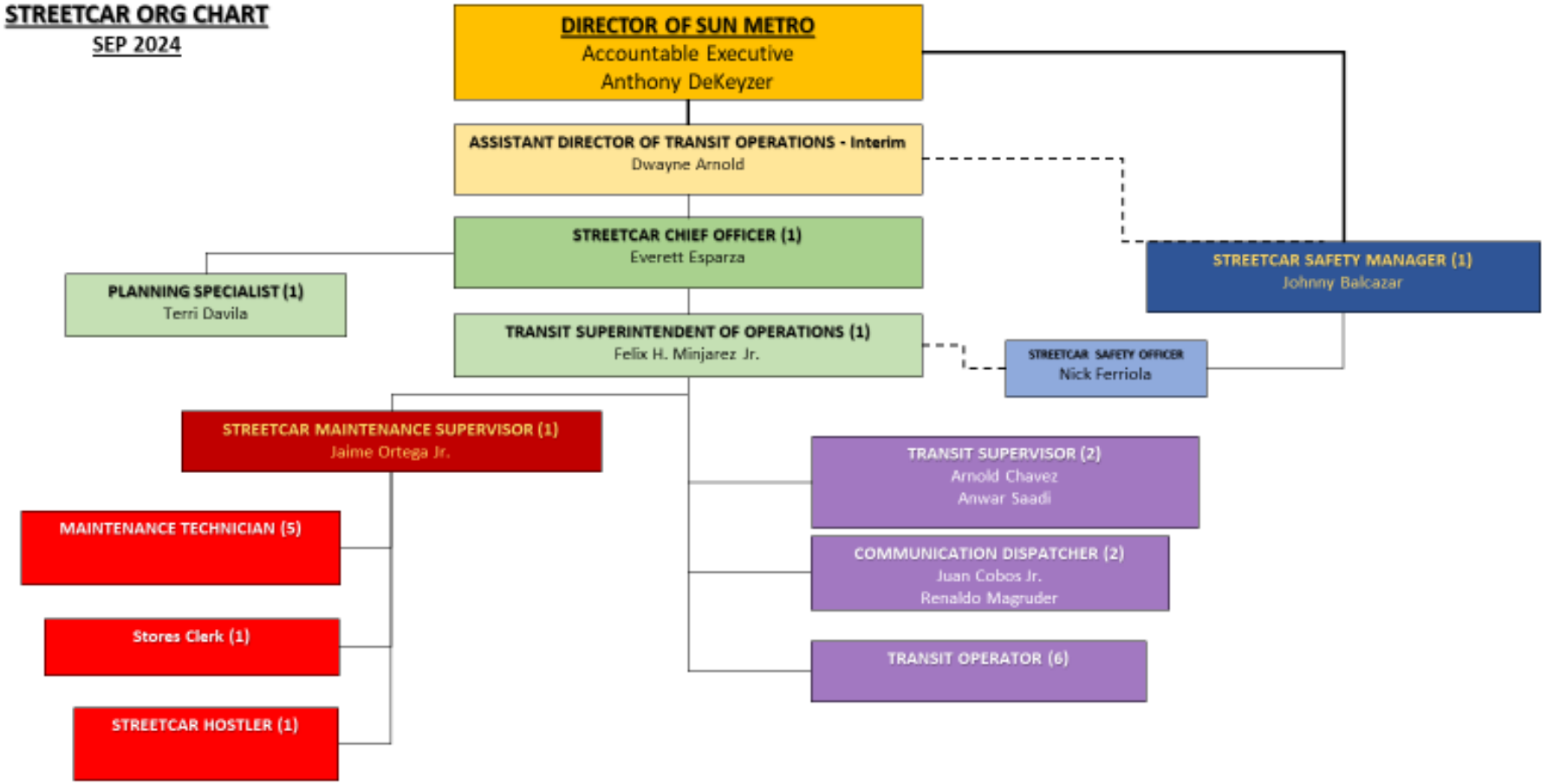
1. **Risk Assessment Results:** Projects addressing the highest safety risks identified through the Safety Risk Management (SRM) process.
2. **Performance Impact:** Projects expected to significantly contribute to achieving or improving safety performance metrics.
3. **Eligibility Criteria:** Projects 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
SEP 2024
DIRECTOR OF SUN METRO
Accountable Executive
Anthony DeKeyzer
ASSISTANT DIRECTOR OF TRANSIT OPERATIONS - Interim
Dwayne Arnold
STREETCAR CHIEF OFFICER (1)
Everett Esparza
PLANNING SPECIALIST (1)
Terri Davila
STREETCAR SAFETY MANAGER (1)
Johnny Balcazar
TRANSIT SUPERINTENDENT OF OPERATIONS (1)
Felix H. Minjarez Jr.
STREETCAR SAFETY OFFICER
Nick Ferriola
STREETCAR MAINTENANCE SUPERVISOR (1)
Jaime Ortega Jr.
TRANSIT SUPERVISOR (2)
Arnold Chavez
Anwar Saadi
MAINTENANCE TECHNICIAN (5)
COMMUNICATION DISPATCHER (2)
Juan Cobos Jr.
Renaldo Magruder
Stores Clerk (1)
TRANSIT OPERATOR (6)
STREETCAR HOSTLER (1)

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 on-going 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 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 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 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.
- Enforcing 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 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 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 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 two 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 below:

- 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 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 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 reports 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, worker's 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: Conduct 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 department 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 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	40.0-4.5	>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, and 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 worker's 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, worker's 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 the 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 informed 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 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 in 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 their 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 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 have 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 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.

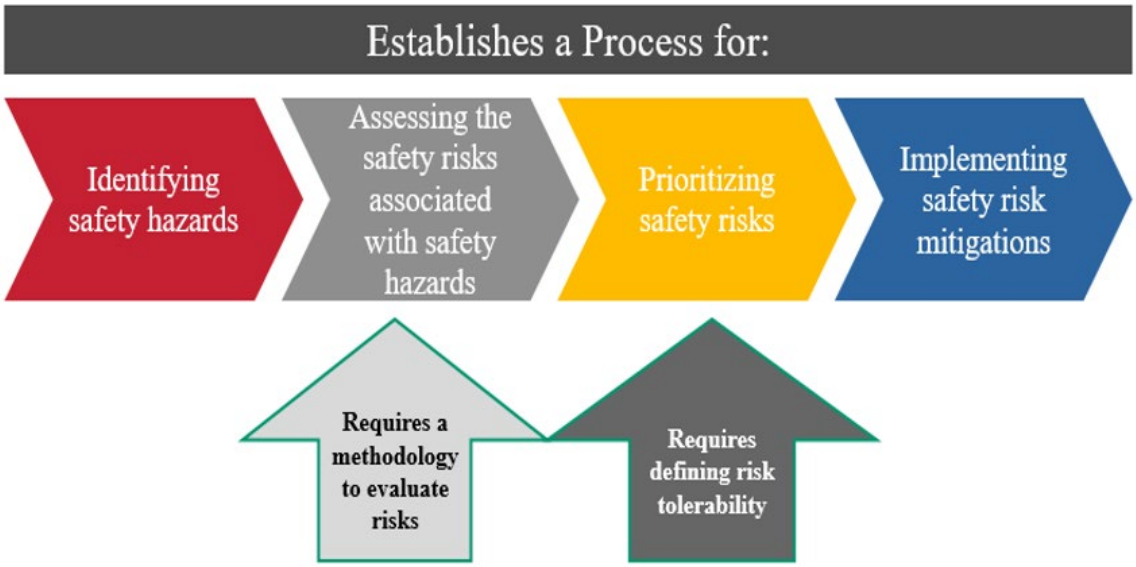
The safety manager is responsible for documenting in writing which method was used and that all employees were formally notified and acknowledged that they received the information.

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. The process will identify hazards, assess the hazards, develop corrective action to mitigate or eliminate the hazard, and assess the success of the corrective actions in eliminating or minimizing to an acceptable risk status by 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 re-occur"

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 4.3the 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)

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 on largely 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.

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	May occur several times in the life of an item. 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. 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

Hazard Probability	Probability Levels
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 is 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 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 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.

Sun Metro uses the following methodology to ensure system safety objectives to eliminate or control 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 nor 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

The Roadworkers Protection Manual (RPM) provides detailed procedures for identifying and mitigating risks associated with roadway and trackway operations. It outlines measures such as temporary traffic control, use of personal protective equipment, and

communication protocols. All workers and supervisors must adhere to the guidelines established in the RPM when operating in these environments.

1. 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.

This includes but is not limited to:

- Formal audits
- Inspections
- Monitoring Rule and Standard Operating Procedure (SOP) compliance.
- Constant evaluation of hazards already mitigated.
- Monitor Sun Metro operations to identify any safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended.

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 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 Equip 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 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 reoccurrence 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 Part 672, 673 & 674, 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 done:

- 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 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 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 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 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. 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 2025

2025			
	Sun Metro - Lift	**Sun Metro - Streetcar**	**Sun Metro - Bus**
60-Day Notice to Sun Metro	Tuesday, April 8, 2025	Monday, July 7, 2025	Monday, May 12, 2025
30-Day Notice to Sun Metro	Thursday, May 8, 2025	Thursday, August 7, 2025	Wednesday, June 11, 2025
Audit Commencement	Monday, June 9, 2025	Monday, September 8, 2025	Monday, July 7, 2025
Audit Conclusion	Friday, June 13, 2025	Friday, September 12, 2025	Friday, July 11, 2025
Sun Metro Responses	Monday, July 14, 2025	Monday, October 13, 2025	Monday, August 11, 2025
Finalized Audit Report	Thursday, August 14, 2025	Thursday, November 13, 2025	Thursday, September 11, 2025

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. 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 the RTA must be corrected 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. On-going 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 safety and operations manager coordinate additions to or deletions from these documents which 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 Radom 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 making pop 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 asses employees' knowledge of rules and procedures and validates 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 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 covers 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

Para Transit				
Fiscal Year				
Risk Reduction Program Targets	2022	2023	2024*	2025
Total Vehicle Revenue Miles	1708667	1994510	2371684	2513985
Major Events Total	3	3	5	2
Major Events Rate	0.1755	0.1504	0.2108	0.0795
Collision Total	33	24	32	27
Collision Rate	1.9313	1.2033	1.3492	1.0739
Injuries	0	4	3	2
Injury Rate	0	5.36	3.13	2.34
Transit Worker Injury Rate	0	5.36	3.13	2.34
Assaults in Transit Workers	**0**	**0**	**0**	**0**
Assaults on Transit Workers' Rate	0	0	0	0
System Reliability				

Sun Metro Fixed Route

Fixed Route				
Fiscal Year				
Risk Reduction Program Targets	2022	2023	2024*	2025
Total Vehicle Revenue Miles	5,132,203	5,712,826	5,589,182	5,478,070
Major Events Total	18	16	17	17
Major Events Rate	0.35	0.28	0.3	0.31
Collision Total	128	136	136	133
Collision Rate	2.49	2.38	2.43	2.42
Injuries	34	46	43	41
Injury Rate	7.06	9.23	8.33	8.2
Transit Worker Injury Rate	5.81	6.82	6.82	6.48
Assaults in Transit Workers	**1**	**1**	**2**	**1**
Assaults on Transit Workers' Rate	0	0	0	0
System Reliability	139,500	238,000	189,244	240,000

Sun Metro El Paso Streetcar

Streetcar				
Fiscal Year				
Risk Reduction Program Targets	2022	2023	2024*	2025
Total Vehicle Revenue Miles	22,883	41,046	67,275	73,734
Major Events Total	1	1	0	0
Major Events Rate	0.22	0.12	0	0
Collision Total	5	8	26	13
Collision Rate	1.09	0.97	1.93	1.49
Injuries	0	3	1	1
Injury Rate		11.53	3.84	8.4
Transit Worker Injury Rate	0	27.47	13.73	13.73
Assaults in Transit Workers	**0**	**0**	**1**	**0**
Assaults on Transit Workers' Rate	0	0	0.07	0
System Reliability	22,880	39,812	67,275	70,000

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 their 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 drives 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 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.
- Asses 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. 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 individual responsible for implementing the CAP; and
- Comments were subsequently added pursuant to the review and closure of the CAP.

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 is 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 change proposal (including Capital Expenditure Approval) • Inform relevant functional Manager(s)	Change proposer
2. Determine 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 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 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
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 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 operation 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 develop phases, 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 which 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 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 is compliance 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.

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.

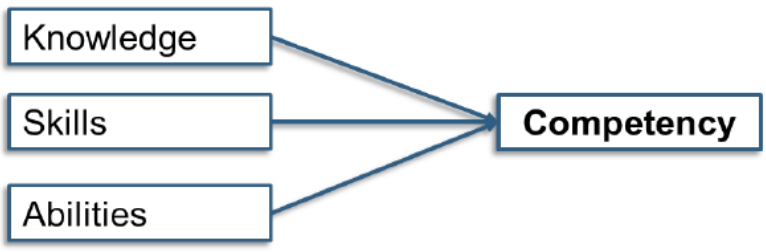
Notification and Coordination with SSO

- 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 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 Sn 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 are 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 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:

<u>Operations</u>

- 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

<u>Maintenance</u>

- 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 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:

- Increase in the number of safety concerns reported annually, indicating 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 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 order, rule, or SOP. 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.

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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, and 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 approval date will be provided separately from 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 mitigate and recommend by 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 require 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 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 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 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.

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

Appendices

A. Mass Transit Department Board Approval Resolution

RESOLUTION

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

The Sun Metro Agency Safety Plan attached to this resolution as Attachment "A" is approved and adopted. 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, 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 Sun Metro Agency Safety Plan. Further, to the extent allowed by law that the City Manager is authorized to make any changes to the Sun Metro Agency Safety Plan.

APPROVED this _____ day of _____, 2025.

MASS TRANSIT BOARD:

ATTEST:

_____
Renard U. Johnson, Chairman

_____
Laura D. Prine, Secretary

APPROVED AS TO FORM:

_____
Joyce Garcia
Assistant City Attorney

APPROVED AS TO CONTENT:

Anthony R. Dekeyzer
_____
Anthony DeKeyzer
Director of Mass Transit

(Attachment "A" on the following pages)

B. TxDOT Approval Letter

C. Configuration Management Plan

Sun Metro
Configuration Management Plan

Revision 2
November 4, 2022

Table of Contents

Revision History

REVISION NUMBER	EFFECTIVE DATE	DESCRIPTION OF CHANGES
Rev 1	10-26-18	Updated for Revenue Service
Rev 2	11-04-22	Updated document to encompass Sun Metro as an Agency
	11-4-22	Updated signature page with new names with correct titles

Plan Approval Documentation

Prepared By	Signature	Date
Johnny Balcazar, WSO-CSSD, TSSP, PTSCTP-Rail/Bus Streetcar Safety Manager CSO/SMS Executive		2/1/2023
Reviewed By	**Signature**	**Date**
Esteban Perea, TSSP, WSO-CSM Transit Safety Manager, Sun Metro		2/1/2023
German Meza Sun Metro LIFT Safety & Operations Manager		2/1/2023
Felix Minjarez Jr., TSSP Streetcar Superintendent of Operations		2/1/2023
Robert Dominguez Transit Superintendent of Operations, Sun Metro		2.1.23
Everett Esparza Chief Streetcar Officer		2/1/2023
Danny Meza Fleet Maintenance Manager		2-1-2023
Jaime Ortega Jr. Streetcar Maintenance Supervisor		2-1-2023
Anthony DeKeyzer Assistant Director of Transit Operations, Sun Metro		2/1/2023
Approved By	**Signature**	**Date**
Ellen A. Smyth, P.E. Chief Transit and Field Operations Officer, Managing Director for Sun Metro (Accountable Executive)		2-1-2023

1. INTRODUCTION

1.1 DEFINITIONS

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

Baseline - A Baseline is the configuration of an element at a specific point in its life cycle. A version of a plan, procedure, document, equipment, facility, hardware, or software, which has been benchmarked and controlled in a configuration management system from which all changes are measured against. Baselines, plus approved changes constitute the current configuration identification of an element.

Change Request - A proposed modification to the baseline of an element that is managed by the Change Control process.

CMP - Configuration Management Plan

Configuration - The functional and/or physical characteristics of system elements, hardware/software, plans, procedures, and technical requirements as outlined in technical documentation and achieved in a product.

Configuration Control - The systematic evaluation, coordination, approval, tracking, dissemination, and implementation of all approved changes in the configuration of any item after the establishment of its configuration-controlled baseline.

Configuration Identification - The current approved or conditionally approved technical documentation for a configuration item as outlined in criteria, technical requirements, specifications, drawings, and associated documents.

Configuration Management - The process of documenting, tracking approved changes and maintains the historical status of an element.

Chief Safety Officer or SMS Executive - Means an adequately trained individual who has responsibility for safety and reports directly to a transit agency's chief executive officer, general manager, president, or equivalent officer. A Chief Safety Officer may not serve in other operational or maintenance capacities unless employed by a transit agency that is a small public transportation provider as defined 49 CFR 673.5 or, a public transportation provider that does not operate a rail fixed guideway public transportation system.

Life cycle - The phases of an element from conceptual design through requirements analysis, design, development, testing (validation), installation, operation, maintenance, and retirement.

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)

2. CONFIGURATION MANAGEMENT

2.1 OVERVIEW

This Configuration Management Plan (CMP) is a tool used to establish the overall approach for documentation and control of configuration changes to the Sun Metro Transit System. El Paso Streetcar [EPSC], Demand Response [Lift], and Fixed Route Operations [FR]. The scope of this plan extends to the establishment of baselines and documentation of all changes to any plans, procedures, criteria, technical requirements, specifications, drawings, hardware, and software of the Sun Metro Transit System from inception to retirement.

The CMP is a dynamic document that will be reviewed annually and updated as necessary. As a living document, additions, deletions, and modifications will occur and such changes will be tracked, and approved by the Accountable Executive (AE) and will be documented in the configuration management reports. Changes to this document after acceptance of the initial version will be included in the next controlled revision.

The Accountable Executive is responsible for oversight of the development, implementation, and maintenance of a comprehensive Configuration Management Program for Sun Metro.

2.2 GOALS AND OBJECTIVES

The goals of this Configuration Management Plan (CMP) are to:

1) Define and develop guidelines that will ensure system baselines are established,
2) Ensure design changes are properly controlled, managed, and communicated to the appropriate stakeholders, and
3) Ensure that an efficient system development process is created and maintained.

The following are some benefits of this comprehensive configuration management program:

- It ensures safety, standardization, consistency of review and
- analysis prior to making changes to systems, components,
- and/or software (personnel, training, and software)
- It ensures the accuracy of information
- It reduces unauthorized usage
- It builds confidence in the Configuration Management process
- It provides for continuous improvement
- It enables safe and efficient system changes and upgrades.

The current objectives for the Sun Metro Configuration Management Program are to:

- Define and document Configuration Management (CM) processes
- Educate and train personnel on CM processes
- Develop CM performance measures
- Provide accurate information
- Identify, label, and locate items placed in a database
- Perform CM assessments/audits

This CMP describes the overall technical and administrative direction and control for the total system life cycle from conceptual design, through construction and installation, during operations, and until the retirement of an element. The application of this CMP includes:

- Initial implementation and changes during the design
- Implementation of construction and installation of system elements
- Integrated testing and validation of the system
- Changes during the operation of a Revenue Vehicle
- Documentation, tracking, and reporting on any changes to the baseline of the system
- Retirement of any facility, rail vehicle, bus, equipment, component, element, or item of the system.

2.3 SCOPE

The CMP establishes guidelines for administering a uniform configuration management program for new facilities and systems and upgrading or refurbishing existing facilities and systems. These guidelines include documentation, management, and approval requirements for configuration management activities.

2.4 APPLICABILITY

This CMP applies to the entire Sun Metro Transit System. The guidelines in this CMP apply to all aspects of the system including, but not limited to, new and rehabilitation projects impacting, streetcars, buses, stations, line sections, systems, and facilities.

The baseline for all infrastructure changes will be the as-built and approved contractor/vendor-conformed drawings, specifications, software, the latest revision of drawings for existing infrastructure, operations and maintenance manuals, and standard operating procedures. This document will be reviewed and updated per this procedure.

2.5 PURPOSE

Configuration Management is the systematic control of the physical and operational features of a safety/security-critical project, program, system, or operation, along with the monitoring and documenting of all changes to these features. The procedures for initiating, processing, and implementing safety/security-critical modifications and improvements must include complete and accurate documentation for traceability of the chain of custody to critical infrastructure and equipment. It identifies the items to be managed and the control processes necessary to maintain an accurate record of the history of any configuration changes.

This document establishes for Sun Metro:

1. Clear and consistent criteria for determining what equipment, facility, and documentation changes are subject to configuration management and document change control;
2. Consistent procedures for the submittal, approval, and implementation of all changes to the subject system, equipment, or facility changes;
3. Processes for documentation and dissemination of all such configuration changes;
4. A process to ensure all configuration changes affecting personnel, equipment, and/or procedures are carefully analyzed for safety/security impacts and hazards that may be introduced by the changes;
5. An efficient and consistently applied process for the distribution, safe storage, and quick retrieval of all applicable documents

This Configuration Management Plan includes, but is not limited to the following:

1. Plans and Procedures
2. Design Criteria
3. Technical Requirements
4. Basic of Design
5. Rule Book
6. Interface Control Documents
7. Specification
8. Drawings
9. Software
10. Hardware
11. Equipment
12. Facilities

3. RESPONSIBILITIES

3.1 AUTHORITY

The is the Accountable Executive and has the overall responsibility for decisions and management of Sun Metro. The Accountable Executive will delegate responsibility for

the day-to-day management of Sun Metro to the Assistant Director of Transit Operations. The Assistant Director of Transit Operations will delegate responsibility for configuration management and change control to the Mode-specific in question.

3.2 CONFIGURATION MANAGEMENT RESPONSIBILITY

The Accountable has overall responsibility for configuration management and changes control oversight at Sun Metro. Mode-specific management and administrative staff are responsible for the implementation of this configuration management plan and the SMS Executive/Chief Safety Officer [CSO] under the direction of the Accountable Executive (AE) is responsible for monitoring compliance with this configuration management procedure.

Each relevant stakeholder, with the review and approval as appropriate of the Accountable Executive and the SMS Executive/CSO, shall be responsible for compliance with the requirements of the CMP, including the following: develop, maintain, and update specific internal procedures, which clearly define the day-to-day procedures for identifying, approving, validating, and communicating changes to its assets. These procedures shall then be submitted to the manager, as designated by the SMS Executive/CSO.

It is the responsibility of the change initiator to complete the required change control document, and then submit it, along with the applicable supporting documents in electronic copy form, to the designated Manager for processing.

4. BASELINE MANAGEMENT

4.1 BASELINE DEFINITION

The objective of establishing a baseline is to define a basis for further system life cycle process activity and allow reference to, control of, and traceability among configuration items back to an original set of requirements or criteria. Baselines serve as the common reference point from which all system development activity begins. Baselines identify the basis of developmental changes and the associated dates, approvals, and version control.

- Baselines shall be established for the configuration elements/items. Developmental baselines will be established to aid in controlling and documenting the life cycle change processes.

- A baseline shall be established upon implementation of the conceptual design or draft document phase. Once an initial version of a document or the initial installation has received approval of acceptance testing, further changes to the baseline require review and approval.

4.2 BASELINE CONTROL

Baselines are established in a system development effort to define a formal departure point for controlling future changes that affect performance or functionality. A baseline, once defined and approved, is placed under Configuration Management, after which any changes in the baseline should be formally documented and approved. Each approved change or build should have a unique release number, version number, or revision number. Baselines should be reviewed and approved with an approval memo and attachments for the description of any discrepancies that are part of the release, version, or revision.

5. CONFIGURATION CONTROL

5.1 DESCRIPTION

Configuration control covers the evaluation of all Change Requests, Requests for Deviation, or Requests for Variance, along with their subsequent approval or disapproval. This includes providing methods and procedures for the systematic proposal, justification, evaluation, coordination, and approval or disapproval of proposed changes to the Sun Metro Transit system.

The following outlines the method to avoid the possibility of a change being implemented without due consideration of its effect on the baselines, including logistics impact, costs, schedules, performance, or interface.

To enable the configuration control process to operate correctly and effectively, Sun Metro must oversee changes having the purpose of:

- Providing the relevant information for informed decisions
- Providing Cost Impacts
- Providing Schedule Impacts
- Providing Safety Impacts
- Providing Quality Impacts
- Providing Personnel Impacts
- Determining and implementing decisions
- Reviewing and controlling changes in accordance with policy established by Sun Metro.

5.2 PROCEDURE

Properly controlled configuration management and change control are required by 49 CFR 659 for all safety/security-critical processes. A process is a safety/security-critical if it affects, primarily or secondarily, the safety of passengers, employees, contract employees, or the public. Safety/security-criticality of each process is established by a Hazard Management and Risk Assessment (see PTASP).

Processes for which analysis yields a Hazard Severity Rating of Category (refer to appendix Section) 1 (Catastrophic) or 2 (Critical) shall be deemed safety/security-critical. The Accountable Executive has the final decision as to the safety/security criticality or risk assessment of any area, process, procedure, or element of the Sun Metro Transit system.

1. Safety/security-criticality is established for the following areas:
    a. Rights-of-Way
    b. Track, and Special Trackwork
    c. O/M Signage
    d. Signal and Power Systems
    e. Sun Metro Facilities and Facilities Rehabilitation
    f. Communications Equipment
    g. Vehicle Acquisitions and Overhauls
    h. Fire Life Safety Systems
    i. OEM Modifications
    j. ADA Compliance
    k. Hazardous Materials / Environmental Controls
    l. Operating Rules and Procedures
    m. Maintenance Rules and Procedures
    n. Safety Rules and Procedures
    o. Safety and Security Training
    p. Drug and Alcohol Programs

2. All safety/security-critical documentation shall be reviewed by the department that owns the documentation at least once annually to ensure that the documents are current and meet all requirements of the ASP. Each document shall be properly updated per the Document Format and Control Procedure.

3. Minimum Criteria for processes:

    a. System-wide configuration management procedures will apply to all drawings, procedures, manuals, schematics, specifications, training documents, sign-off sheets, checklists, etc., which apply to the safety/security-critical process.
    b. Departmental document control procedures, including version control, will apply to all of the above.
    c. Required reviews and sign-off procedures for changes, modifications, and revisions shall apply.
    d. The development of written procedures and checklists (when relevant) will apply to all safety/security-critical processes and will include the criteria on this information.

e. Adequate and technologically current training programs will apply with documentation of such programs, including on-the-job training.
f. Quality assurance processes will apply through internal auditing procedures, and quality inspection and quality control when applicable.
g. Review of all processes for changes in their safety/security-critical status shall apply under the following conditions:
   (1) When a significant change impacting a safety/security-critical element of the system or process itself occurs, defined as changes to operating territory, vehicle acquisition or overhaul, new or rehabbed facilities, system power configuration changes, and any other critical component of Sun Metro operations.
   (2) When a safety/security-critical element affecting a safety/security-critical process is vacated, created, or changed, including reorganization.
   (3) At least once every three years.
h. Processes found to have changed in safety/security-criticality will be addressed immediately in an appropriate manner.

5.3 CONFIGURATION MANAGEMENT / CHANGE CONTROL PROCESS

Configuration changes shall be classified as either Class I or Class II. The originator may make an initial determination of the class of a proposed change; however, the AE or the SMS Executive/CSO may make changes to the original classification. The Accountable Executive has final decision-making authority as to the Class of the configuration change.

5.3.1 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 of Sun Metro. The ECR or documented request will provide detailed information and any other related data to support the formal change approval, which will effect 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

5.3.2 Class II Changes

Class II changes are all changes that are not classified as Class I change. 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 ECR form, and/or through a documented request, with a detailed description of the proposed change.

5.4 DEVIATIONS

Deviations are formal requests, made before the manufacturing of an item, that depart from a design configuration for a specified number of units and/or for a specified period of time. A deviation differs from an ECR in that an approved ECR requires a corresponding revision of the documentation defining the asset. A deviation does not require revision of the documentation.

5.5 PROCESS

Configuration changes requiring hazard review under the minimum criteria above will be subject to the following review as follows:

A. Proposed changes to safety/security-critical items as defined in this procedure shall be submitted in writing to the SMS Executive/CSO. Supporting drawings, schematics, manuals, programs, and other documentation shall be submitted with the proposal.

B. The SMS Executive/CSO will review the change with assistance from subject matter technical support and determine hazards associated with the configuration change. The hazard assessment performed for each change shall be documented per the PTASP.

C. If the changes result in no significant hazard the SMS Executive/CSO will advise the AE if no action is required, and the changes are acceptable without review. With the AE's approval, the SMS Executive/CSO may notify the FLSC of their decision.

D. If the changes result in significant hazards (red and yellow designations on the Hazard Acceptance Criteria), the SMS Executive/CSO, under the direction of the AE, will prepare a brief for the FLSC on the hazards, along with recommendations for corrective actions to be implemented for the change to take place. If no corrective action will result in an acceptable level of risk, the SMS Executive/CSO will include that information in the brief.

E. The SMS Executive/CSO will present the findings of the configuration management review to the FLSC.

F. The FLSC shall decide on the proposed configuration change. Options are:

   (1) Proceed with the change as planned
   (2) Implement corrective action and proceed with the change
   (3) Implement a different change (which must then be reviewed for hazards through this procedure)
   (4) Provide guidance as to alternate means of implementing the change, to eliminate hazards
   (5) Disapprove the change

G. The SMS Executive/CSO shall ensure that all recommendations of the FLSC are documented and implemented as appropriate.

6. DOCUMENT CONTROL

6.1 GENERAL

Document control provides for version control of the development, review, update, and distribution of record documents at Sun Metro. Every controlled document is developed and implemented in accordance with this Configuration Management Plan. The Document Control covers:

- Identification of controlled documents
- Assignment of numerical identifiers to controlled documents
- Procedures for version or revision control of controlled documents
- Distribution lists for controlled documents
- Procedures for dissemination and assignment of copies of controlled documents
- Procedures for updates, recall, and retirement of controlled documents.

6.2 DOCUMENT CONTROL TOOLS

Document Control provides a uniform system of controlled document identification and a central repository of all controlled documents and their revision records. To the extent possible, electronic records shall be maintained of all correspondence and transmittals of controlled documents and their revisions. These hard copy and electronic tools shall ensure that:

- Criteria are presented for determining which documents will be controlled
- A master list of controlled documents is maintained
- Both hard copies and electronic copies of the current versions of controlled documents are maintained in the central records database
- The master distribution list is maintained for each controlled document
- Copies of acknowledgment forms for receipt of controlled documents are maintained in the central records database
- Recipients are provided updated copies when controlled documents are revised, updated, or retired.

6.3 CONFIGURATION DOCUMENTATION RECORDS

The configuration records will serve as the basis for ongoing life cycle configuration change control. Detailed configuration records will ensure that an audit trail exists from the current facility or equipment configuration back to its inception.

All agreed-upon changes shall be documented and include a sign-off to verify that the modification was both approved and completed. The SMS Executive/CSO shall ensure that all completed configuration/change management documentation shall be retained in an appropriate format by Sun Metro Transit System.

APPENDIX

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 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

D. Risk-Base Inspections

El Paso Streetcar

El Paso Streetcar System Overview

The El Paso Streetcar is a heritage streetcar system that operates in downtown El Paso, Texas. The streetcar vehicles used in this system are vintage Presidents' Conference Committee (PCC) streetcars, which were originally built in the 1930s and 1940s. The 4.8-mile route serving 27 stops serves the community from Wednesday to Saturday shown in the figure below. The streetcars have been restored and equipped with modern amenities such as air conditioning, wheelchair access, and bike racks. The system includes signaling and communication systems, platform doors, and fare collection equipment. A list of key contacts for the El Paso Streetcar system is listed on the final page of this procedure.

Category 2(a): EPSC Property Access and Inspection Procedures

The following procedures apply to TxDOT's access to EPSC infrastructure, equipment, records, personnel, and data.

Inspections With Notice

Inspections with notice will occur with 7 days or more notice. TxDOT will notify the EPSC Streetcar Safety Manager and other designated personnel of the intent to conduct an unannounced inspection. The notification will be sent via email and will include the inspection purpose, date, time, locations, requested

escorts and RTA staff requested to attend. Although TxDOT may schedule announced inspections with 7 days' notice, TxDOT prefers to provide 10 days or more advance notice to allow TxDOT and the RTA time to prepare for the inspection.

Inspection with Notice (Announced) Procedure and Timeline:

1) TxDOT (SSO PM or Contractor) will notify the Streetcar Safety Manager, Chief Streetcar Officer, and Streetcar Superintendent of Operations by email 7 days or more before the intended inspection.
    a. A notification email will contain the inspection purpose, date, time, locations, requested escorts and RTA staff requested to attend.
    b. TxDOT contractor will call the Streetcar Safety Manager, Chief Streetcar Officer, or Streetcar Superintendent of Operations to plan the inspection activities requested by TxDOT.

Inspections <u>Without</u> Notice

Inspections without notice will occur **with no notice**. TxDOT will notify the RTA's CSO and other designated personnel of the intent to conduct an unannounced inspection. TxDOT will abide by each RTA's track allocation procedures and timelines to access areas that require adherence to track allocation procedures

Inspection <u>Without</u> Notice Procedure and Timeline:

1) TxDOT (SSO PM or Contractor) will notify the Streetcar Safety Manager, Chief Streetcar Officer, and Streetcar Superintendent of Operations by email, telephone, or in person **at the time of the inspection**.
    a. The inspection notice will contain the inspection purpose, date, time, locations, requested escorts, and RTA staff requested to attend.
2) The TxDOT contractor will contact the Streetcar Safety Manager, Chief Streetcar Officer, or Streetcar Superintendent of Operations regarding TxDOT's request for an inspection.
3) The TxDOT inspection team will gather at the agreed-upon location until the inspection begins.
4) RTA must begin implementing RBI Procedures within 15 minutes of TxDOT notification and inspection must begin within 3 hours or less of TxDOT Inspections notification.

In instances when track allocation or required escorts cannot accommodate an unannounced inspection, TxDOT may consider rescheduling the inspection at a mutually agreeable time. In emergency or exigent circumstances TxDOT may invoke authorities necessary to cease operation (emergency order under TAC 7.95), gain emergency track allocation or foul time, and conduct inspections on TxDOT's schedule.

Inspection Notification Information

The TxDOT Lead Inspector will provide notifications as described in the Notifications sections above. Notifications, both with and without notice, will contain the following information:

- Inspection agenda,
- Inspection purpose,
- Risk prioritization,
- Date and time of inspections,
- Locations to be inspected,
- Data needed for inspection,
- requested escorts, and
- RTA staff requested to attend.

Access procedures, including all areas, and required escorts:
TxDOT SSO staff and SSO Support Contractors have full access through key cards to El Paso Streetcar's property, including infrastructure, equipment, facilities, data, and personnel. However, TxDOT SSO staff will not enter publicly inaccessible areas without an RTA escort. TxDOT will inform the Streetcar Safety Manager when staff are or will be on-site and intend to inspect non-publicly accessible areas. When arriving at RTA's property, TxDOT staff will gather at a safe location, such as a main entrance, reception area, or other area requested by the RTA, and await an RTA escort.

1) TxDOT inspectors will gather in a safe location at the time stated in the notification and await the arrival of RTA escorts. The following locations shall serve as gathering spots:
    a. Maintenance and Storage Facility (MSF): 601-A Santa Fe St. El Paso, TX 79901Grade
    b. Crossings: (nearest public sidewalk adjacent to the crossing)
    c. Stations: (within the publicly accessible platform area)
2) The TxDOT Lead Inspector will facilitate team introductions between the TxDOT and El Paso Streetcar escorts and team.
3) ESPC Streetcar Safety Manager or delegated staff will ensure that required escort(s) and track allocation are provided by the start time of the inspection.
4) EPSC must begin implementing RBI Procedures within 15 minutes of TxDOT notification, and inspection must begin within 3 hours or less of TxDOT Inspections notification.

Verification of certifications and training of SSOA inspectors to ensure their compliance with RTA safety protocols and requirements:
The following procedures apply to TxDOT inspectors' pre-inspection briefing and confirmation of adherence to all TxDOT and EPSC safety protocols and requirements.

1) The TxDOT Lead Inspector will conduct an inspection briefing with the RTA escort to review and discuss the following inspection details:
    a. The TxDOT team lead will provide the agenda and verbally inform the RTA of the TxDOT personnel present, inspection purpose, locations to inspect, and schedule.
    b. TxDOT Lead Inspector will next ensure each team member physically displays Roadway Worker Protection (RWP) verification to the EPSC escort. Displaying valid RWP demonstrates each inspection team member is authorized to enter locations requiring such certifications.
        i. Inspectors unable to display valid RWP will not enter areas requiring certification.
    c. The TxDOT Lead Inspector will ask the inspection team member to demonstrate to the El Paso Streetcar escort the required personal protective gear, which may include:
        i. name badges,
        ii. RWP cards,
        iii. steel-toe or composite-toe boots,
        iv. appropriate clothing for inspection to be completed,
        v. RTA-approved safety vests
        vi. protective eyewear,
        vii. hearing protection,
        viii. gloves, and
        ix. hardhats/bumps CAPs.
    d. TxDOT Lead Inspector will request a safety briefing from the RTA escort to inform or discuss with TxDOT and RTA personnel any information necessary for a safe inspection, including any known hazards or safety concerns, and personal electronic device policies.

e. The inspection will begin only when the TxDOT Lead Inspector and the RTA escort have confirmed each step of the inspection briefing, training and PPE verification, and safety briefing.

Scheduling Inspections:

TxDOT will schedule four inspections with notice and at least one inspection without notice at the RTA each calendar year. At its discretion, and as guided by the RTA's safety performance and TxDOT's risk prioritization process, TxDOT may conduct additional announced and unannounced inspections. Inspection scheduling will occur as described in the Notifications to the RTA section above. TxDOT Personnel may utilize regularly scheduled maintenance and maintenance inspections to conduct both announced and unannounced risk-based inspections by accompanying and observing the maintenance activity. Because of that El Paso Streetcar will provide TxDOT personnel by email, prior to the end of the current month, a copy of schedules for maintenance inspections for the upcoming month. TxDOT personnel will then coordinate with El Paso Streetcar safety to execute the inspection.

Inspection Reports Timeline and Recipients:

TxDOT and the EPSC will implement the following Inspection Report procedure.

1) TxDOT will email the Streetcar Safety Manager, Chief Streetcar Officer, or Streetcar Superintendent of Operations a Word version of the Inspection Report no later than 30 days after completion of the inspection.
2) The RTA will have 10 days to review and respond via email to the TxDOT SSO PM and Contractor Project Manager with any correction, clarification, or revision requests.
3) TxDOT will factor in the RTA's response and the TxDOT will send the final Inspection Report via email not later than 10 days after the RTA's draft Inspection Report response. TxDOT will also upload the Inspection Report into the RTA RBI Module within the SSO Tracker system.

Inspection Reports Procedure:

TxDOT will prepare an Inspection Report and complete the procedure as described in the section. The Inspection Report provided to the RTA which will include the following sections:

- Date and time of inspection,
- TxDOT personnel present, including Inspection Team Lead, and RTA personnel present,
- Location and functional area inspected,
- Description of issues or deficiencies noted, including immediate safety concerns.
- Photographs, documentation, or diagrams, if available, and
- Corrective actions required or recommendations.

1) The TxDOT SSO Program Manager will draft and transmit via email a draft Inspection Report to the Streetcar Safety Manager, Director of Safety, and Streetcar Superintendent of Operations no later than 30 days after the conclusion of the Inspection. Inspection is considered conducted after the verbal debrief has been concluded by the TxDOT Lead Inspector.
2) The Streetcar Safety Manager, Director of Safety, and Streetcar Superintendent of Operations will review the draft Inspection Report and comment via email to the TxDOT SSO PM and Support Contractor Project Manager within 10 days of the date TxDOT transmitted the draft report.
3) TxDOT will review the comments and issue the final Inspection Report no later than 10 days after the RTA's deadline to submit comments. TxDOT SSO PM and Support Contractor Project Manager will email the final Inspection Report to the Streetcar Safety Manager, Chief Streetcar Officer, and Streetcar Superintendent of Operations and upload the report into the SSO Tracker system.

Immediate Safety Concerns

Each member of the TxDOT Inspection team has the right to raise a safety concern at any point in the planning, preparation for, or conducting of an inspection. If an immediate safety concern is identified by the TxDOT inspectors, their priority will be to ensure the safety of all personnel present. Ensuring the safety of all personnel present may include delaying, pausing, or canceling the inspection, not entering inspection areas, or departing the inspection areas until the safety concern is resolved.

When a safety concern is observed the individual will notify the TxDOT Lead Inspector, who will then notify all TxDOT and personnel present. Depending on the circumstances, the inspector may need to notify:

- dispatch,
- law enforcement personnel, or
- Streetcar Safety Manager

The TxDOT Lead Inspector will work together with EPSC staff to ensure personnel are in a safe location and to reassess the safety of the inspection team. If the inspection cannot safely continue, then TxDOT or the RTA may immediately cancel the inspection. Canceled inspections for safety concerns will be documented within the inspection report. TxDOT may consider the inspection complete or may be rescheduled at a future date.

If the inspection can safely continue, then the TxDOT inspection team will document and photograph the safety concern observed and immediately discuss the issue with the TxDOT and EPSC staff present. At the conclusion of the inspection, TxDOT will email the Streetcar Safety Manager and other designated staff within 24 hours to explain the immediate safety concern observed. TxDOT requires immediate safety concerns to be managed in compliance with the PTASP-prescribed safety risk management processes and the TxDOT Program Standard. The specific procedures regarding immediate safety concerns are provided in the individual EPSC procedures section of this document.

Ensuring the Safety of Inspection Personnel:

1) A TxDOT or EPSC inspection team member has the right to raise a safety concern at any point in the planning, preparation for, or conducting of an inspection.
    a. Examples of safety concerns may include:
        i. Security concerns such as criminal activity, suspicious person and/or package, or unsafe location,
        ii. Inclement weather or threat of inclement weather,
        iii. Personnel conduct including disregard for safety procedures and fatigue,
        iv. Equipment or infrastructure-related concerns such as damaged or missing safety features, unsafe or improper operation, or safety-related conditions
        v. Any other safety-related reason.
2) TxDOT or EPSC personnel observing a safety concern must immediately report the safety concern to the TxDOT Lead Inspector and RTA escort.
3) The TxDOT Lead Inspector will immediately notify all personnel present, including TxDOT and EPSC personnel.
4) The TxDOT Lead Inspector and EPSC personnel will immediately assess the safety concern to determine if inspection personnel must stop inspection activities and move to a different location to ensure safety.
5) The TxDOT Lead Inspector will ensure all personnel are in a safe location.
6) The inspection shall not continue until the safety concern has been resolved.
7) The TxDOT Lead Inspector will determine if additional EPSC must be immediately notified.
8) The TxDOT Lead Inspector will contact the following contacts as described below:
    a. Streetcar Safety Manager

b. Chief Streetcar Officer
c. Streetcar Superintendent of Operations

9) If the safety concern cannot be resolved, then the TxDOT Lead Inspector or EPSC personnel may cancel the inspection and depart the El Paso Streetcar property.
10) If the safety concern can be resolved, then the Inspection will resume as soon as the safety issue is resolved.
11) The TxDOT Lead Inspector will inform all personnel, including TxDOT and RTA, that the issue is resolved, and the inspection will resume.
12) Inspection may resume upon resolution of safety concerns.

Communicating Safety Concerns to EPSC

1) The TxDOT Lead Inspector will verbally communicate the immediate safety concern upon discovery as described above, during the inspection conclusion, via email, and as part of the inspection report.
2) TxDOT Lead Inspector will also explain any safety concerns discovered as part of a verbal debrief after the inspection is complete.
3) Within 24 hours of the inspection conclusion, the TxDOT Inspection Lead will send via email, to the Streetcar Safety Manager and Chief Streetcar Officer, a summary of the safety concern observed, including details of what the safety concern, an explanation of why it is a safety concern, photographs or other documentation pertinent to the concern.
4) TxDOT will also include the immediate safety concern within the inspection report.
5) TxDOT will coordinate with the Streetcar Safety Manager and safety staff to ensure the safety concern is managed in accordance with safety risk management requirements within the Program Standard and PTASP. Such actions could include documentation of a hazard, corrective action, including an emergency corrective action, and further investigation from EPSC personnel including EPSC safety staff or the EPSC safety committee.

Inspections of Equipment, Infrastructure, & Practices Specific to El Paso Streetcar

The following procedure will define the El Paso Streetcar equipment, infrastructure, and practices present (broad) and the inspection frequencies and practices (specific) that TxDOT will consider when determining inspection areas.

TxDOT may conduct inspections of any infrastructure, equipment, locations, records, personnel, and data of EPSC's rail system. Any property or personnel (employee or contractor) performing work related to the rail system could be the subject of a TxDOT SSO inspection.

The El Paso Streetcar system is comprised of the following areas:

1) Six vintage PCC Streetcars
2) Track inspection and maintenance consists of 4.3 miles of embedded track spanning 27 stations in addition to yard track and bridges.
3) The Traction Power System consists of four Traction Power Substations and the Overhead Contact System.
4) Signals consist of two interlockings and five bar signals.
5) Facilities include 27 stations.
6) Public Transportation Agency Safety Plan and associated plans, documents, policies, and procedures.

Event Verification

TxDOT and EPSC coordinate throughout the accident investigation process as described in Section 7: Accident Investigation of the TxDOT SSO Program Standard. The following section summarizes how TxDOT conducts Event Verification for RBI-related investigation and safety risk identification processes.

TXDOT has delegated investigative responsibility to EPSC but reserves the right to conduct independent investigations at its discretion. TxDOT has ultimate responsibility for the sufficiency and thoroughness of RTA-completed investigations. As part of accident oversight, TxDOT reviews the EPSC's findings of causation and determines if a corrective action plan is required because of the accident.

As part of the investigation review process, TxDOT carefully analyzes accident details to understand if similar characteristics or dynamics exist within the EPSC's system. For example, TxDOT analyzes accidents and incidents individually and aggregates using the metrics described within Category 4: Inspection Prioritization to determine commonalities in organizational, environmental, technical, or geospatial/temporal characteristics. These metrics aid in understanding probable and contributing causes, and guide the identification of safety risks.

TxDOT also requires EPSC to provide information on damaged infrastructure, equipment, or property and subsequent corrective maintenance or repair needs to return damaged items to service. TxDOT verifies repairs and returns to service through a review of documentation which may include work orders, repair summaries, or photographs. TxDOT may also verify repairs and return to as part of inspection activities.

Ongoing Monitoring

TxDOT conducts ongoing announced inspections of each rail agency on a two-year cycle to monitor all areas of the rail agency. To establish the two-year cycle, TxDOT first assesses each RTA to determine the functional areas and associated infrastructure, equipment, facilities, and procedures of each system. TxDOT then divides the functional areas into a two-year cycle divided into calendar quarters.

In addition to ongoing monitoring throughout the two-year period, TxDOT conducts monthly conference calls to discuss safety events, safety risk management, corrective actions, audits, reviews, management of change, and inspection-related items.

TxDOT factors in analysis resulting from safety, inspection, and maintenance data to guide ongoing monitoring efforts. Ongoing monitoring could indicate the need for additional inspections with notice or without notice or additional RTA coordination related to risk profile.

To establish the ongoing monitoring inspection schedule, TxDOT uses the following process.:

1) TxDOT and SSO Support Contractors will develop a two-year calendar prior to implementation of the RBI program.
2) The two-year calendar will be divided into quarters, and each quarter may include the following functional areas:
    a. EPSC S's functional areas include:
        i. Track
        ii. Signals
        iii. Traction Power Systems
        iv. Vehicles
        v. Facilities
        vi. PTASP compliance, including plans, documents, policies, and procedures.
3) During the quarter, TxDOT will perform an announced inspection to observe and inspect the functional area selected for review. The inspection may include the following activities:

a. Review of past and current data
b. Discussions with RTA staff
c. Observations of task performance
d. Inspection of infrastructure, equipment, vehicles, or data.
e. Verification of accident, incident, corrective action, or mitigation implementation.

4) Inspection activities are documented with an inspection report within 30 days of monitoring activities.

Defects and Corrective or Remedial Actions

TxDOT may monitor EPSC defects, corrective, and remedial action detection, tracking, and resolution as part of the RBI process. TxDOT requires RTAs to provide shared data on the most severe defects discovered and the efforts leading to defect resolution. TxDOT may track defects by number and severity to ensure each RTA manages these items in compliance with the safety risk management processes defined within the PTASP and TxDOT Program Standard.

RTAs are expected to detect, document, and resolve defects, and corrective, or remedial actions through established inspection, trouble-shooting, and corrective maintenance practices. Defects, corrective, or remedial actions may also require documentation on hazard logs, resolution through safety committees' coordination, and submitting monthly hazard logs to TxDOT for review. Safety concerns that meet or exceed TxDOT's reporting threshold require corrective actions that must be reported to TxDOT using the SSO Tracker information system and managed in accordance with TxDOT's Program Standard.

CAP and Safety Risk Mitigation Verification

TxDOT coordinates with each RTA on corrective action plans and safety risk mitigation development, implementation, and verification as described below.

As specified in the Program Standard, Section 9.1 Corrective Action Plans, RTAs shall develop and implement corrective action plans (CAPs) resulting from:

- Investigations,
- Hazard management process,
- Audit findings,
- Internal safety review findings,
- Engineering or construction of RTA projects,
- Non-compliance with RTA policies or procedures, or
- FTA or SSO direction.

Hazards identified for mitigation and reported to TxDOT are evaluated to determine the needs for CAP creation. The SSO Tracker system will be used for RTAs to submit CAPs for TxDOT review and approval, to request CAP closure, and to keep TxDOT informed on the status of open CAPs. The SSO Tracker system allows TxDOT to monitor and track the status of open CAPs in real time.

The RTA must request TxDOT close a CAP once identified actions have been implemented. TxDOT will verify that the CAP has been implemented in compliance with the approved plan by reviewing evidence provided either as a description of actions taken, attached documentation, or uploaded pictures verifying completion.

TxDOT also requires coordination on safety risk mitigations as specified in the Program Standard, section 8.6 Monitoring of RTA Hazard. To summarize, TxDOT requires RTAs to submit quarterly logs that summarize safety risk management information including:

- Date issue discovered.
- Summary or description of safety risk, including location.
- Assessment including probability and severity.
- Responsible RTA department or employee tasked with resolving the issue.
- Status of hazard or risk resolution, including mitigations or corrective actions implemented.

TxDOT monitors and verifies the successful implementation of safety risk mitigations and corrective actions using various methods. Issues of administrative issues such as policy, procedure, and documentation improvements are monitored and verified primarily through documentation reviews. Safety risk mitigations and corrective actions involving equipment, facilities, and infrastructure are verified through a combination of documentation reviews and onsite inspections. Mitigations and corrective actions involving implementation operations, maintenance, or safety practices are monitored through observation-based inspections referenced in the Ongoing Monitoring section above.

Category 3(a): EPSC Data Procedures

As described in Category 5, TxDOT uses NTD Profile Data to ensure the RBI Program is commensurate with RTA number, size, and complexity. Rail agency characteristics such as vehicles in service, directional route miles, and operational characteristics including revenue hours and revenue miles demonstrate a clear difference between light rail and streetcar systems.

TxDOT recognizes the differences in size and complexity between light rail and streetcar systems. El Paso Streetcar operates fewer vehicles per day, fewer hours per week, and over shorter distances at slower speeds. As a light rail system, El Paso Streetcar will submit data encompassing the full spectrum of activities in areas including safety management, maintenance, inspection, and other activities outlined within the PTASP.

TxDOT and El Paso Streetcar will share data according to the procedures below.

Data Submission Method, Schedule, Quantity, and Acceptable Formats:

1) The RTA shall submit RBI data within the SSO Tracker system. The data will be submitted within the RBI module, in the appropriate data section (Safety, Maintenance, Inspection, or Additional Safety), and within the appropriate calendar quarter.

2) The RTA will submit data no later than 30 days after the end of the reporting period.
    a. **Safety Data:**
        i. Monthly Hazard Log
        ii. Master Log
            1. Monthly: 30 days after the end of the month.

    b. **Maintenance and Inspection Data:**
        i. [Maintenance Data Log or similar tracking document used in Safety Risk Management]
            1. Quarter 1: Jan, Feb, and Mar. Data is due on April 30th.
            2. Quarter 2: April, May, and June. Data is due on July 30th.
            3. Quarter 3: Jul, Aug, and Sept. Data due on Oct 30th.

4. Quarter 4: Oct, Nov, and Dec. Data due on Jan 30th.

c. Additional Safety Data:

i. As requested,

3) Data shall be submitted in the SSO Tracker system in the following acceptable formats:
   a. Microsoft Excel
   b. Microsoft Access
   c. Tableau

Safety Data

Each month the RTA will submit safety data information as incorporated into this procedure in accordance with TxDOT's RBI data requirements. Safety data sets may include accidents, incidents, hazards, corrective action plans, safety risk mitigations, and records of near misses. Through routine SSO activities, TxDOT has access to RTA accident data, SSO reportable hazards, internal hazard tracking, corrective action plans, safety risk mitigations, and near-miss reporting.

The RTA will submit Safety data each quarter for the requested segments using the procedure below.

1) The Streetcar Safety Manager or Designee will submit safety data sets in the RBI Module, Safety Data section in the SSO Tracker no later than 30 days after the end of the quarter.

2) Summarized Safety Data may include:
   a. Summary Status Report of Accidents.
   b. Summary Status Report of Incidents.
   c. Summary Status Report of Hazards.
   d. Summary Status Report of Corrective Action Plans.
   e. Summary Status Report of Near-miss Records.

3) Safety Data sets submitted by El Paso Streetcar may include:
   a. Accident/Injury Reports
   b. Blocking log
   c. Audits
   d. Inspections
   e. Ride checks
   f. Unusual Situations Reports
   g. Event Reports
   h. Daily Operations Summary
   i. Employee/Occupational Injury reports
   j. National Transit Database (NTD) Safety and Security reporting module
   k. Monthly Hazard Logs
   l. Master Log
   m. System Reliability

4) Safety Data sets TxDOT may include the following types of data:
   a. Accidents,
   b. SSO reportable hazards,
   c. RTA internal hazard logs,

d. Correct action plans,
e. Safety risk mitigations,
f. Near miss reporting

Maintenance and Inspection Data

Rail Vehicle Inspection and Preventative Maintenance Data:
If identified through ongoing safety oversight activities as a priority, TxDOT may select one El Paso Streetcar vehicle to review as part of RBI data analysis.

To facilitate the selection of data sets, TxDOT maintains a rail vehicle register and each rail vehicle receives a unique identifier. Rail vehicle data sets include data for all maintenance and inspection activities that occurred on the selected rail vehicle during the quarter.

If identified as a priority by the TxDOT SSO Program, EPSC will submit the requested rail vehicle status summary and detailed vehicle data each quarter for the vehicle selected as part of the data sample.

a. No later than the final day of the calendar quarter, TxDOT will inform EPSC of the rail vehicle or vehicles selected for review.
b. The Streetcar Safety Manager or Designee will submit requested rail vehicle data sets in the RBI Module, Rail Vehicle section in SSO Tracker no later than 30 days after the end of the quarter.
c. Summarized Rail Vehicle Maintenance and Inspection data may include:
    i. Summary Status Report of Rail Vehicle Maintenance and Inspection.
    ii. Summary Report of Troubleshooting status.
    iii. Summary Report of Issue Repair status.
    iv. Summary Report on Major Repair status.
    v. Summary Report of Corrective Maintenance Status
    vi. Summary Report on Work Order status.
    vii. Summary Report on Vehicles Out of Service.
    viii. Requested data set for the vehicles selected by TxDOT.

b. Maintenance and Inspection data sets for selected vehicles may include:
    i. Weekly inspections are scheduled and completed.
    ii. Monthly inspections are scheduled and completed.
    iii. Bi-monthly inspections are scheduled and completed.
    iv. Three months of inspections scheduled and completed.
    v. Four months of inspections scheduled and completed.
    vi. Six months of inspections scheduled and completed.
    vii. Eight Months of inspections scheduled and completed.
    viii. One-and-half-year inspections scheduled and completed.
    ix. Annual inspections.
    x. Wheel Inspections scheduled and completed.
    xi. Wheel trucking (power trucks) scheduled and completed.
    xii. Wheel Truing (center truck) scheduled and completed.
    xiii. Corrective Maintenance: Troubleshooting summary.
    xiv. Repair Summary
    xv. Major Repairs summary

xvi. Emergency Action summary
xvii. Work Order Summary
xviii. Out-of-service summary
xix.

Track Inspection and Maintenance Data:

If identified as a priority, TxDOT may select El Paso Streetcar's track maintenance records as part of RBI data analysis.

1) No later than the final day of the calendar quarter, TxDOT will inform Metro if track maintenance records are included in the requested data.

2) The Streetcar Safety Manager or Designee will submit track data sets in the RBI Module, Track section in SSO Tracker no later than 30 days after the end of the quarter.

3) Summarized Track Maintenance and Inspection data may include:
   a. Summary Status Report of track inspection and maintenance
   b. Summary Status Report of switch inspection and maintenance
   c. Summary Status Report of track geometry, ultrasonic, conditional, and bridge inspection and maintenance.
   d. Summary Status Report of rules compliance inspections.
   e. Summary Report of Troubleshooting status.
   f. Summary Report of Issue Repair status.
   g. Summary Report on Major Repair status.
   h. Summary Report of Corrective Maintenance status.
   i. Summary Report on Work Order status.
   j. Summary Report on Speed Restrictions.

4) Maintenance and Inspection data sets for selected track segments may include:
   a. Track (OMP Section 5.2.1)
      i. Weekly Walking Track Inspection
      ii. Monthly Yard Track Inspection
      iii. Weekly Right-of-Way cleaning
      iv. Annual Ultrasonic Rail Flaw Detection (5.2.5)
      v. Annual Track Geometry (5.2.2.6)
   b. Switch inspections & Maintenance (OMP 5.2.2)
      i. 12-Month Switch Inspection
      ii. 24-Month General Maintenance Inspection
   c. OCS (OMP 5.5.2)
      i. Monthly OCS Walking Inspection
      ii. Semi-annual OCS Contact Wire Level Inspection
      iii. 24-Month OCS Interval Inspection
   d. TPSS (OMP 5.5.5)
      i. Weekly TPSS Health Check
      ii. Semi-annual Feeder Breakers periodic maintenance inspection
      iii. Annual DC Switchgear Maintenance inspection
      iv. Five-year Switchgear periodic maintenance inspection

El Paso Streetcar Key Contacts

Name	Title	Office Phone	Mobile	Email
Balcazar, Johnny	Streetcar Safety Manager/SMS Executive	(915) 212-3466	(915) 255-6085	BalcazarJM@elpasotexas.gov
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Esparza, Everett	Chief Streetcar Officer	(915) 212-3464	(915) 503-6650	EsparzaEX@elpasotexas.gov
Minjarez, Felix	Streetcar Superintendent of Operations	(915) 212-3455	(915) 873-7605	MinjarezFH@elpasotexas.gov
Ortega, Jaime	Streetcar Maintenance Supervisor	(915) 212-3475	(915) 873-8205	OrtegaJJ@elpasotexas.gov
Ferriola, Nick	Streetcar Safety and Security Officer	(915) 212-3465	(915) 255-6094	FerriolaNL@elpasotexas.gov

Other Important Numbers

- El Paso Streetcar Dispatch is located at 601-A Santa Fe Street, El Paso, TX 79901
- El Paso Streetcar Dispatch phone number(s):
  915-212-3460
  915-212-3461
  915-212-3454
- After hours Sun Metro Dispatch can be reached at
  915-212-3425

REDLINE VERSION

Sun Metro Agency Safety Plan

Redline Version *
Revision 5
October 1, 2024

***Additions to document are highlighted**

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**
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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

Date	Revision	Description of Change	Section or Page
		Revision History Table	Page 6
		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, 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
		Added new Upper Eastside Transfer Center	Page 16

Date	Revision	Description of Change	Section or Page
		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 Tittles 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
		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

Date	Revision	Description of Change	Section or Page
		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
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 the Route 84 from sun Metro Service and added information on the Brio information board status	Page 22 - 24

Date	Revision	Description of Change	Section or Page
		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
		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

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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 pf records and related materials, including ,but not limited to, those related t 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 chief executive officer, 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 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 view 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** mean:
    (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 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. **Equivalent entity** means an entity that carries out duties similar to that 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 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 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 conducts 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 (Survives 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, organizational, 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 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 of the injury was received;
    (2) Results in a fracture of any bone (except simple fractures of fingers, toes, or noses);
    (3) Causes severe hemorrhages, nerve, muscle, or tendon damage;
    (4) Involves any internal organ; or

    Involves 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 set forth 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	Center 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 21st 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 *also see NPTSP*
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	Preventative Maintenance
PMI	Preventative Maintenance Inspection
PMMS	Preventative 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 *also see MSDS*
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 State 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 and one county Route. 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 four-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:

Brio Roadway and TOD Stations

- 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

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 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

Any change or modification to the rail system has the potential to affect passenger and/or employee safety, therefore any change or modification to the rail system will be a reason to review and update the Sun Metro PTASP. Changes to the system in the revenue service period will be conducted in accordance with TxDOT, and Sun Metro policies.

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.
- 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 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 it:

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

All employees and contractors are charged with responsibility for the safety of passengers, employees, property, and those who come in contact with our systems. In addition, ALL employees are accountable for the safety performance of Sun Metro.

Specific accountability for safety performance rests with those responsible for the management of each transit mode operated under Sun Metro.

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 emergency situations

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	**Signature**	**Date**
Anthony R. DeKeyzer (Accountable Executive)	_____	_____

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
Measure 1a – Major Events	This includes all safety and security major events as defined by the NTD.
Measure 1b – Major Event Rate.	This includes all safety and security major events as defined by the NTD, divided by VRM.
Measure 1.1 – Collision Rate (new)	This includes all collisions reported to the NTD, divided by VRM.
Measure 1.1.1 – Pedestrian Collision Rate (new)	This includes all collisions "with a person," as defined by the NTD, divided by VRM.
Measure 1.1.2 – Vehicular Collision Rate (new)	This includes all collisions "with a motor vehicle," as defined by the NTD, divided by VRM.
Measure 2a – Fatalities	This includes all fatalities as defined by the NTD.
Measure 2b – Fatality Rate	This includes all fatalities as defined by the NTD, divided by VRM.
Measure 2.1 – Transit Worker Fatality Rate (new)	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.
Measure 3a – Injuries	This includes all injuries as defined by the NTD.
Measure 3b – Injury Rate.	This includes all injuries as defined by the NTD, divided by VRM.

Safety Performance Measure	**Description**
Measure 3.1 – Transit Worker Injury Rate (new)	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.
Measure 4a – Assaults on Transit Workers (new)	This includes all assaults on transit workers as defined by the NTD.9
Measure 4b – Rate of Assaults on Transit Workers (new)	This includes all assaults on transit workers as defined by the NTD, divided by VRM.
Measure 5 – System Reliability	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 of 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 your 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 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,
- The weapon fired on 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 events 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 Year 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

Para Transit Fiscal Year				
Safety Performance Measures	**2022**	**2023**	**2024***	**2025**
Total Vehicle Revenue Miles	1708667	1994510	2371684	2513985
Major Events				
Major Events Total	3	3	5	2
Major Events Rate	0.1755	0.1504	0.2108	0.0795
Collision Total	33	24	32	27
Collision Rate	1.9313	1.2033	1.3492	1.0739
Pedestrian Collisions Total	0	0	1	0
Pedestrian Collision Rate	0	0	0.0421	0
Vehicular Collisions Total	13	16	18	11
Vehicular Collision Rate	0.642	0.687	0.614	0.437
Fatalities	**0**	**0**	**0**	**0**
Fatality Rate	0	0	0	0
Transit Worker Fatality Rate	0	0	0	0
Injuries	**0**	**4**	**3**	**2**
Injury Rate	0	5.36	3.13	2.34
Transit Worker Injury Rate				
Assaults in Transit Workers	**0**	**0**	**0**	**0**
Assaults on Transit Workers' Rate	0	0	0	0
System Reliability				

Sun Metro Fixed Route

Fixed Route Fiscal Year				
Safety Performance Measures	**2022**	**2023**	**2024***	**2025**
Total Vehicle Revenue Miles	5,132,203	5,712,826	5,589,182	5,478,070
Major Events				
Major Events Total	18	16	17	17
Major Events Rate	0.35	0.28	0.30	0.31
Collision Total	128	136	136	133
Collision Rate	2.49	2.38	2.43	2.42
Pedestrian Collisions Total	1	4	0	
Pedestrian Collision Rate	0	0	0	
Vehicular Collisions Total	102	103	96	301
Vehicular Collision Rate	1.99	1.80	1.72	1.00
Fatalities	**1**	**0**	**1**	**0**
Fatality Rate	0.02	0	0.01	0
Transit Worker Fatality Rate	0	0	0	0
	0	0	0	0
Injuries	**34**	**46**	**43**	**41**
Injury Rate	7.06	9.23	8.33	8.2
Transit Worker Injury Rate	5.81	6.82	6.82	6.48
Assaults in Transit Workers	**1**	**1**	**2**	**1**
Assaults on Transit Workers' Rate	0	0	0	0
System Reliability	139,500	238,000	189,244	240,000

Sun Metro El Paso Streetcar

Streetcar Fiscal Year				
Safety Performance Measures	**2022**	**2023**	**2024***	**2025**
Total Vehicle Revenue Miles	22,883	41,046	67,275	73,734
Major Events				
Major Events Total	1	1	0	0
Major Events Rate	0.22	0.12	0.00	0.00
Collision Total	5	8	26	13
Collision Rate	1.09	0.97	1.93	1.49
Pedestrian Collisions Total	0	0	0	0
Pedestrian Collision Rate	0.00	0.00	0.00	0.00
Vehicular Collisions Total	5	8	26	13
Vehicular Collision Rate	1.09	0.97	1.93	1.33
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	**0**	**3**	**1**	**1**
Injury Rate	0	11.53	3.84	8.4
Transit Worker Injury Rate	0	27.47	13.73	13.73
Assaults in Transit Workers	**0**	**0**	**1**	**0**
Assaults on Transit Workers' Rate	0.00	0.00	0.07	0.00
System Reliability	22,880	39,812	67,275	70,000

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 program 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, 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 sign 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 to discuss any safety issues, and is 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.

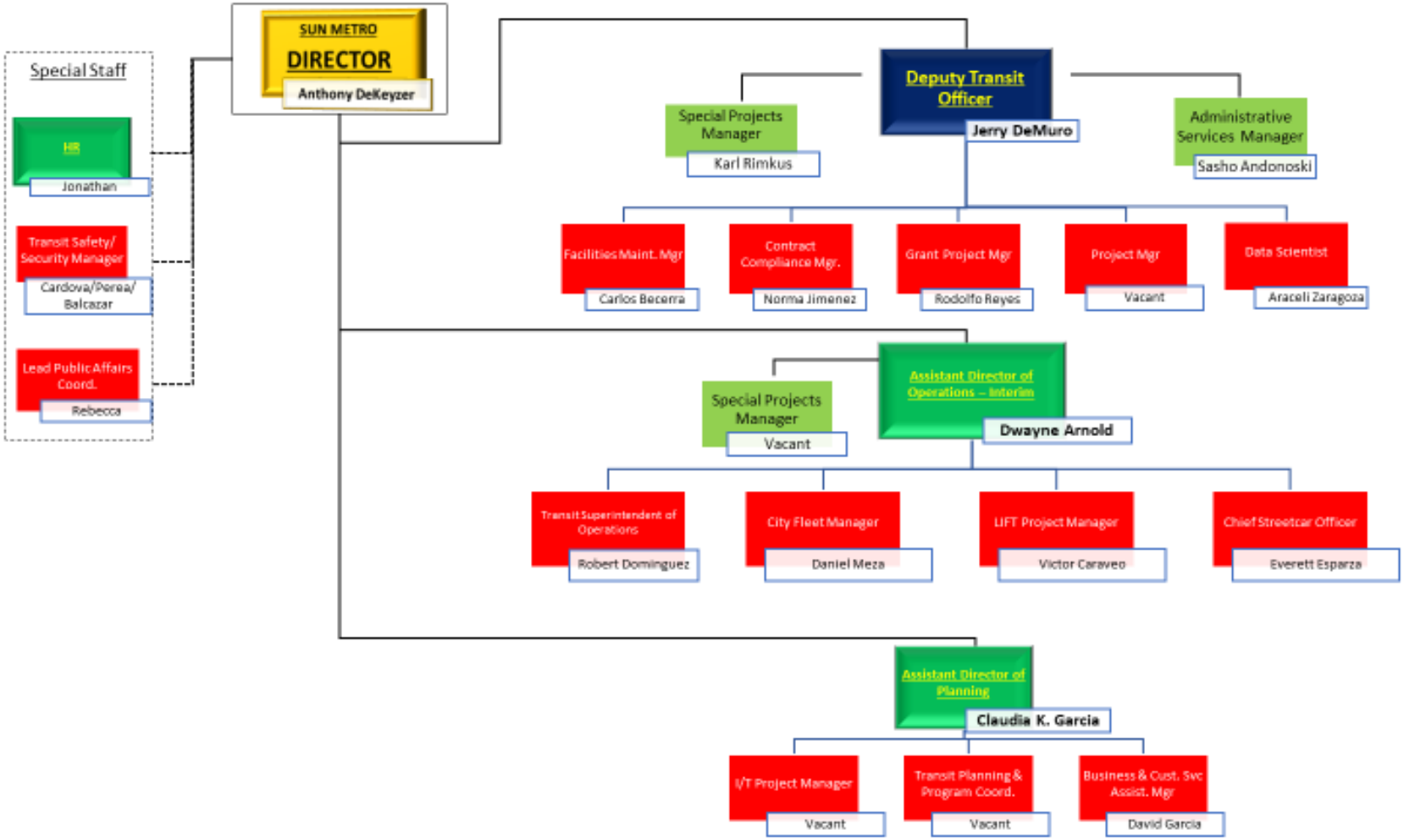
For Fiscal Year 2025, the Director of Sun Metro and the Accountable Executive will prioritize funding for safety-related projects based on:

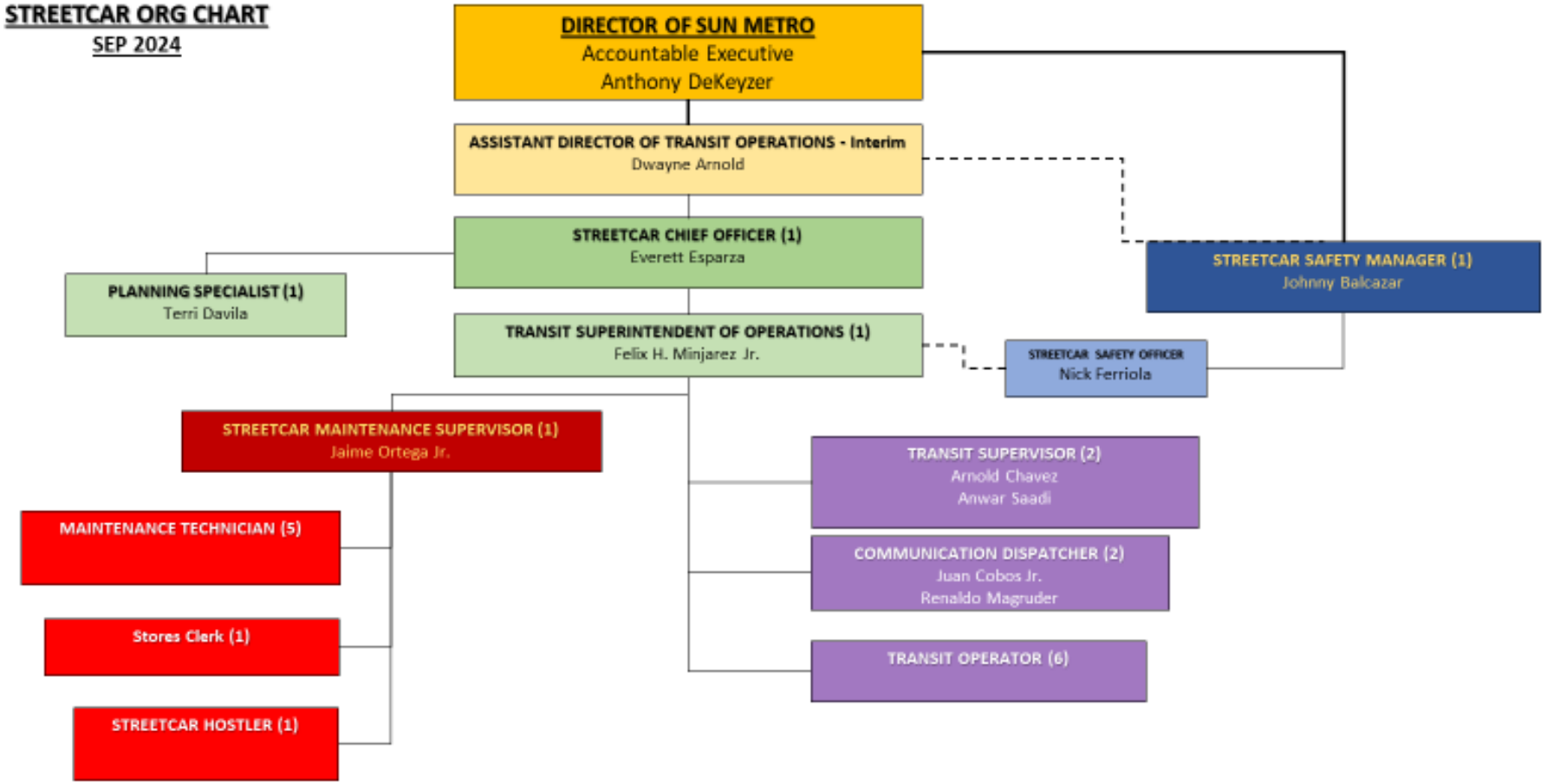
1. **Risk Assessment Results:** Projects addressing the highest safety risks identified through the Safety Risk Management (SRM) process.
2. **Performance Impact:** Projects expected to significantly contribute to achieving or improving safety performance metrics.
3. **Eligibility Criteria:** Projects 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
SEP 2024
DIRECTOR OF SUN METRO
Accountable Executive
Anthony DeKeyzer
ASSISTANT DIRECTOR OF TRANSIT OPERATIONS - Interim
Dwayne Arnold
STREETCAR CHIEF OFFICER (1)
Everett Esparza
PLANNING SPECIALIST (1)
Terri Davila
STREETCAR SAFETY MANAGER (1)
Johnny Balcazar
TRANSIT SUPERINTENDENT OF OPERATIONS (1)
Felix H. Minjarez Jr.
STREETCAR SAFETY OFFICER
Nick Ferriola
STREETCAR MAINTENANCE SUPERVISOR (1)
Jaime Ortega Jr.
TRANSIT SUPERVISOR (2)
Arnold Chavez
Anwar Saadi
MAINTENANCE TECHNICIAN (5)
COMMUNICATION DISPATCHER (2)
Juan Cobos Jr.
Renaldo Magruder
Stores Clerk (1)
TRANSIT OPERATOR (6)
STREETCAR HOSTLER (1)

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 on-going 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 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 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 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.
- Enforcing 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 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 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 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 two 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 below:

- 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 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 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 reports 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, worker's 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: Conduct 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 department 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 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	40.0-4.5	>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, and 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 worker's 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, worker's 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 the 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 informed 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 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 in 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 their 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 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 have 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 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.

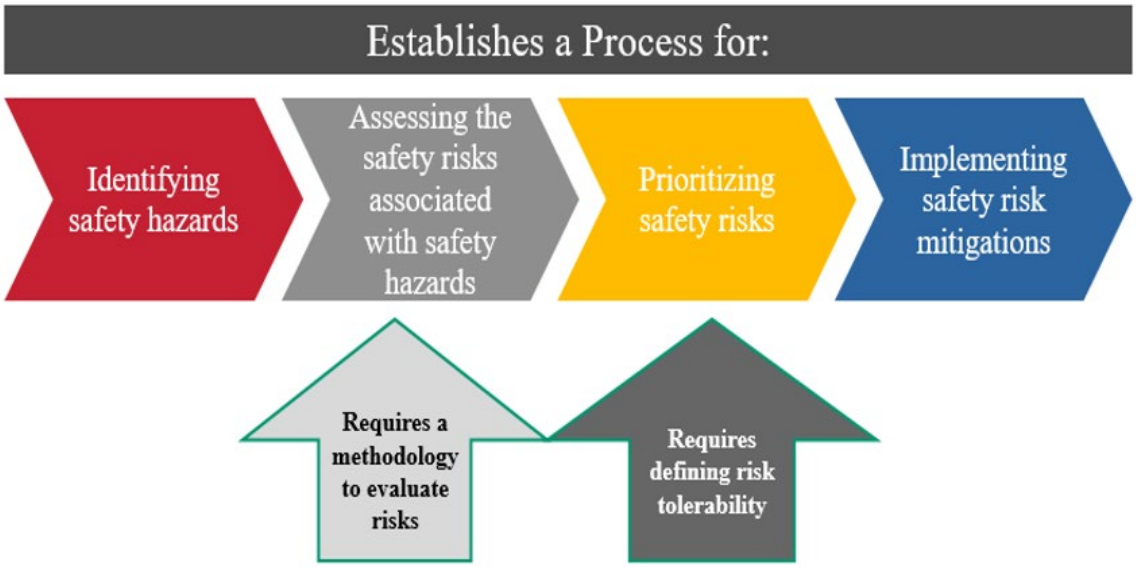
The safety manager is responsible for documenting in writing which method was used and that all employees were formally notified and acknowledged that they received the information.

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. The process will identify hazards, assess the hazards, develop corrective action to mitigate or eliminate the hazard, and assess the success of the corrective actions in eliminating or minimizing to an acceptable risk status by 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 re-occur"

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 4.3the 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)

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 on largely 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.

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	May occur several times in the life of an item. 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. 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

Hazard Probability	Probability Levels
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 is 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 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 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.

Sun Metro uses the following methodology to ensure system safety objectives to eliminate or control 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 nor 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

The Roadworkers Protection Manual (RPM) provides detailed procedures for identifying and mitigating risks associated with roadway and trackway operations. It outlines measures such as temporary traffic control, use of personal protective equipment, and communication protocols. All workers and supervisors must adhere to the guidelines established in the RPM when operating in these environments.

1. 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.

This includes but is not limited to:

- Formal audits
- Inspections
- Monitoring Rule and Standard Operating Procedure (SOP) compliance.
- Constant evaluation of hazards already mitigated.
- Monitor Sun Metro operations to identify any safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended.

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 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 Event Investigations	

Safety Assurance Decision Table	If yes, then…
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 Equip 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 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 reoccurrence 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 Part 672, 673 & 674, 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 done:

- 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 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 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 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 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. 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 2025

2025			
	Sun Metro - Lift	**Sun Metro - Streetcar**	**Sun Metro - Bus**
~~90-Day Notice to Sun Metro~~	~~Friday, March 7, 2025~~	~~Friday, June 6, 2025~~	~~Friday, April 11, 2025~~
60-Day Notice to Sun Metro	Tuesday, April 8, 2025	Monday, July 7, 2025	Monday, May 12, 2025
30-Day Notice to Sun Metro	Thursday, May 8, 2025	Thursday, August 7, 2025	Wednesday, June 11, 2025
Audit Commencement	Monday, June 9, 2025	Monday, September 8, 2025	Monday, July 7, 2025
Audit Conclusion	Friday, June 13, 2025	Friday, September 12, 2025	Friday, July 11, 2025
Sun Metro Responses	Monday, July 14, 2025	Monday, October 13, 2025	Monday, August 11, 2025
Finalized Audit Report	Thursday, August 14, 2025	Thursday, November 13, 2025	Thursday, September 11, 2025

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. 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

~~An annual safety activity report and Safety and Security audit report must be provided to the Director and TxDOT SSO for review and approval no later than February 1st.~~

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 the RTA must be corrected 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. On-going 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 safety and operations manager coordinate additions to or deletions from these documents which 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 Radom 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 making pop 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 asses employees' knowledge of rules and procedures and validates 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 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 covers 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

Para Transit				
Fiscal Year				
Risk Reduction Program Targets	2022	2023	2024*	2025
Total Vehicle Revenue Miles	1708667	1994510	2371684	2513985
Major Events Total	3	3	5	2
Major Events Rate	0.1755	0.1504	0.2108	0.0795
Collision Total	33	24	32	27
Collision Rate	1.9313	1.2033	1.3492	1.0739
Injuries	0	4	3	2

Injury Rate	0	5.36	3.13	2.34
Transit Worker Injury Rate	0	5.36	3.13	2.34
Assaults in Transit Workers	0	0	0	0
Assaults on Transit Workers' Rate	0	0	0	0
System Reliability				

Sun Metro Fixed Route

Fixed Route				
Fiscal Year				
Risk Reduction Program Targets	2022	2023	2024*	2025
Total Vehicle Revenue Miles	5,132,203	5,712,826	5,589,182	5,478,070
Major Events Total	18	16	17	17
Major Events Rate	0.35	0.28	0.3	0.31
Collision Total	128	136	136	133
Collision Rate	2.49	2.38	2.43	2.42
Injuries	34	46	43	41
Injury Rate	7.06	9.23	8.33	8.2
Transit Worker Injury Rate	5.81	6.82	6.82	6.48
Assaults in Transit Workers	1	1	2	1
Assaults on Transit Workers' Rate	0	0	0	0
System Reliability	139,500	238,000	189,244	240,000

Sun Metro El Paso Streetcar

Streetcar				
Fiscal Year				
Risk Reduction Program Targets	2022	2023	2024*	2025
Total Vehicle Revenue Miles	22,883	41,046	67,275	73,734
Major Events Total	1	1	0	0
Major Events Rate	0.22	0.12	0	0
Collision Total	5	8	26	13
Collision Rate	1.09	0.97	1.93	1.49
Injuries	0	3	1	1
Injury Rate		11.53	3.84	8.4
Transit Worker Injury Rate	0	27.47	13.73	13.73
Assaults in Transit Workers	0	0	1	0
Assaults on Transit Workers' Rate	0	0	0.07	0
System Reliability	22,880	39,812	67,275	70,000

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 their 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 drives 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 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.
- Asses 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. 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 individual responsible for implementing the CAP; and
- Comments were subsequently added pursuant to the review and closure of the CAP.

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 is 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 change proposal (including Capital Expenditure Approval) • Inform relevant functional Manager(s)	Change proposer
2. Determine 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 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

Safety Validation of Change Process		
Main Steps	**Key Activities**	**Completed By**
4. Prepare Safety Validation of Change Case	• Prepare safety validation documentation • Complete risk assessment of 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
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 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 operation 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 develop phases, 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 which 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 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 is compliance 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.

~~**6.1.1 Training and Certification Program**~~

~~Each Mode Safety Manager is responsible for the development and implementation of their individual Training and Certification Plan.~~

~~The Public Transportation Safety Certification Program includes two separate requirements for Sun Metro's Training and Certification Plan.~~

- ~~FTA's Public Transportation Safety Certification Training Program regulation, 49 CFR Part 672, specifies "a uniform safety certification training curriculum and requirements to enhance the technical proficiency of **individuals who conduct safety audits and examinations of public transportation systems** and **those who are directly responsible for safety oversight of public transportation agencies**." (§672.1(a))~~
- ~~FTA's Public Transportation Agency Safety Plan (PTASP) regulation, 49 CFR Part 673, requires **Sun Metro** to "establish and implement a comprehensive safety training program for **all agency employees and contractors directly responsible for safety** in the agency's public transportation system." The training program "must include refresher training, as necessary." (§673.29(a))~~

~~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.

In Sun Metro, the following positions are classified as Designated Personnel:

1) Sun Metro Chief Safety Officer 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)

The training plans as a minimum must cover:

1) Safety-sensitive positions are covered in the mode Training Plan. This could include employees and contractors who work as part of the agency's safety function, such as safety officers and analysts, as well as operations and maintenance functions, such as managers, supervisors, and front-line employees
2) Curriculum per safety-sensitive positions (initial training, refresher training, and re-training)
3) Teaching strategies
4) Recordkeeping

- El Paso Streetcar has a Training Plan already developed (revision 1, dated September of 2021that has been submitted, and reviewed by TxDOT. The Training Plan also includes training on required SOPs for Operation and Maintenance.

- The Maintenance staff will be trained in Standard Maintenance Procedures developed by El Sun Metro/El Paso Streetcar.

Each plan must be submitted to the Mass Transit Chief Safety Officer or SMS Executive for review and concurrence. Each plan must be reviewed annually by the Safety Manager of the mode.

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

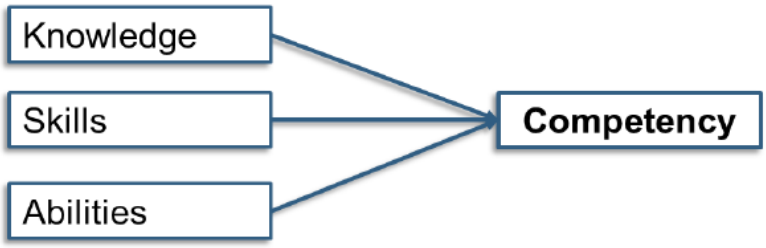
- Sun Metro collaborates with the Texas Department of Transportation (TxDOT) as part of the SSO program.

- 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 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 Sn 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 are 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 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 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:

- Increase in the number of safety concerns reported annually, indicating 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 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 order, rule, or SOP. 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.

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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, and 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 approval date will be provided separately from 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 mitigate and recommend by 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 require 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 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 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 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.

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