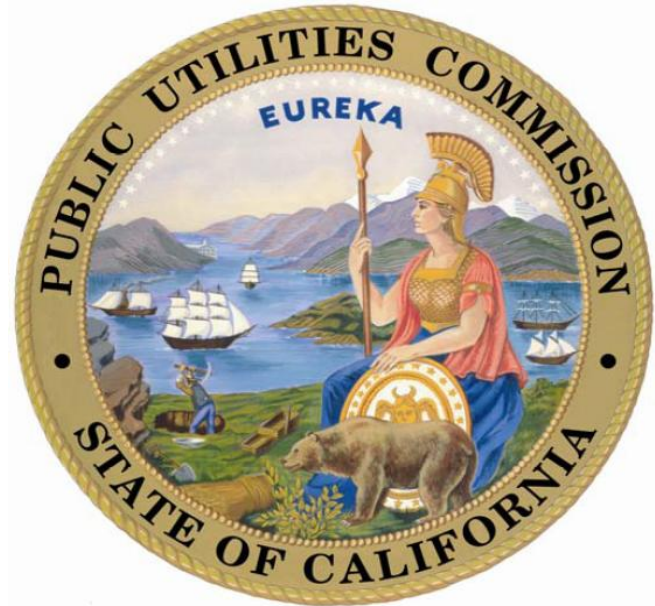

2019

TRIENNIAL SECURITY REVIEW OF SACRAMENTO COUNTY DEPARTMENT OF AIRPORTS (SCDOA) AUTOMATED PEOPLE MOVER SYSTEM

RAIL TRANSIT SAFETY BRANCH
RAIL SAFETY DIVISION
CALIFORNIA PUBLIC UTILITIES COMMISSION
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Final Report
January 22, 2020



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Rail Safety Division

2019 TRIENNIAL SECURITY REVIEW OF SACRAMENTO COUNTY DEPARTMENT OF AIRPORTS (SCDOA) AUTOMATED PEOPLE MOVER SYSTEM

ACKNOWLEDGEMENT

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

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1. EXECUTIVE SUMMARY

The California Public Utilities Commission's (CPUC or Commission) Rail Safety Division (RSD), Rail Transit Safety Branch staff (Staff) conducted an on-site system security program review of the Sacramento County Department of Airports (SCDOA) on May 21, 2019. The review focused on verifying the effective implementation of the System Security Plan Revision 5 (SSP), addressing Threat & Vulnerability Assessment (TVA) and emergency response. This report details Staff's investigatory actions, findings, and recommendations. The review revealed no areas of non-compliance, as discussed below.

On Monday, May 13, 2019, SCDOA personnel and Staff met for an opening conference, which preceded the on-site review activities. On May 21, 2019, Staff conducted the 2019 SCDOA triennial on-site security review. A post-review conference meeting occurred on June 24, 2019, with Staff providing SCDOA personnel with a summary of its review. Staff identified no findings of non-compliance; Staff issued no recommendations for corrective actions.

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

This report reflects Staff's triennial security review of SCDOA. The SCDOA on-site triennial safety review report is contained in a separate Report and is brought before the Commission for approval in a separate Resolution.¹

¹ Staff's safety review and report, "2019 Triennial Safety Review of Sacramento County Department of Airports Automated People Mover" is being brought before the Commission concurrently in Resolution ST-232.

2. INTRODUCTION

The Commission's General Order (GO) 164-E, Rules and Regulations Governing State Safety Oversight of Rail Fixed Guideway Systems, Section 4, Requirements for System Security Plans require the Commission Staff to perform a review of each rail transit agency's system security program at a minimum of once every three years. The triennial review verifies compliance and evaluates the effectiveness of each rail transit agency's System Security Plan (SSP)—in this case the SCDOA System Security Plan (SSP) to assess the level of compliance with GO 164-E and other Commission safety and security requirements. Staff conducted the previous SCDOA on-site security review in February 2016. This is the third on-site security review of the SCDOA.

On April 11, 2019, staff mailed a letter to SCDOA's Director, advising that the Commission's security review had been scheduled beginning May 13, 2019. The letter included five checklists that served as the basis for verification of the effective implementation of SCDOA's SSP.

Staff conducted an opening conference on May 13, 2019 with SCDOA's management team and their contractor's (Bombardier) on-site supervisors and managers.

Staff performed the on-site triennial security review at the SCDOA Operations Building. Staff developed five (5) checklists for the inspection of the System Security Program. Staff derived the checklist review questions from CPUC's GO 164-E, FTA's 49 CFR 659 guidance, Transportation Security Administration's (TSA) Baseline Security Review, and SCDOA's SSP. At the conclusion of each review activity, staff provided SCDOA personnel a verbal summary of the preliminary findings and discussed preliminary recommendations for corrective actions.

On June 24, 2019, Staff conducted a post-review exit meeting with SCDOA's management team. Staff provided attendees a summary of the review and findings from the five checklists. Staff provided the attendees with a summary of the findings of non-compliance derived from the 5 checklists used to guide the review and discussed the need for corrective actions where applicable.

3. BACKGROUND

A. SCDOA APM System Description

SCDOA embarked on a Sacramento International Airport (SMF) development process to identify and implement the vision developed in the Final SMF Master Plan to modify existing airport infrastructure and develop new facilities through the year 2020. The Sacramento County Board of Supervisors (BOS) approved the Master Plan in February 2004.

Completed concurrently with the Master Plan, the Terminal Modernization Program (TMP) included preliminary facilities requirements, terminal complex alternatives, and evaluation of four terminal development concepts—two of which included an APM system. The BOS approved the selection of the preferred terminal development concept which ranked highest in long term strategic, operational, environmental, feasibility/constructability, and customer service. A key decision factor was it allowed the existing Terminal B to continue in operation while its replacement was constructed.

Through authorization from the BOS in June 2007, SCDOA contracted with Bombardier Transportation Holding (BTH) for the design, supply, and installation and Operations and Maintenance (O&M) of an airport APM System at SMF as part of the TMP.

The APM System includes a completely automated dual lane shuttle offering passengers a connection between the Central Terminal B and Airside Concourse B. General system and operating characteristics are given in Table 1-1 and the configuration of the APM system is provided in Figure 1-1. The complete system includes power distribution, power rail and vehicle power collector assemblies and interface, communication system, the CITYFLO 650 communications-based train control system required to operate the system, automatic station platform doors, and CX-100 vehicles. The CX-100 vehicle is a fully automated, air-conditioned vehicle capable of operating in various modes twenty-four hours per day.

Major APM facilities consist of:

- An elevated dual-lane exclusive guideway with an emergency/backup walkway located between guideways;

- Two passenger stations with flow-through configurations (one center platform and two side platforms) located on level three on of the Central Terminal building and level two of the Concourse building;
- A maintenance facility located on level one under the Concourse B station;
- A Central Control Room located within the maintenance facility;
- Two equipment rooms, each on level one of their respective buildings: Central Terminal and Concourse B;
- A power distribution substation located on level one of the Central Terminal building;
- The APM System is designed for two 2-car trains, but will initially operate in a two 1-car train configuration. The System will be expanded when deemed necessary by SCDOA to accommodate passenger growth.

Facilities & Trains	
Stations	2
Route length	1100 feet per lane
Trains in service	2, initially 1-car, ultimately 2-car
Maintenance Facility	1
Central Control Room	1
Estimated Rider ship (passengers per hour per direction)	
Initial	2300
Ultimate	3000
Operations	
Peak period	Dual Lane Shuttle
Off-peak period	Single Lane Shuttle
Night period	On-call Single Lane Shuttle
Average Round Trip Time	Approx 3.0 minutes
Cruise Speed	Approx 20 mph
Operating Hours	24 / 7 / 365

Table 1-1: SMF APM System Characteristics

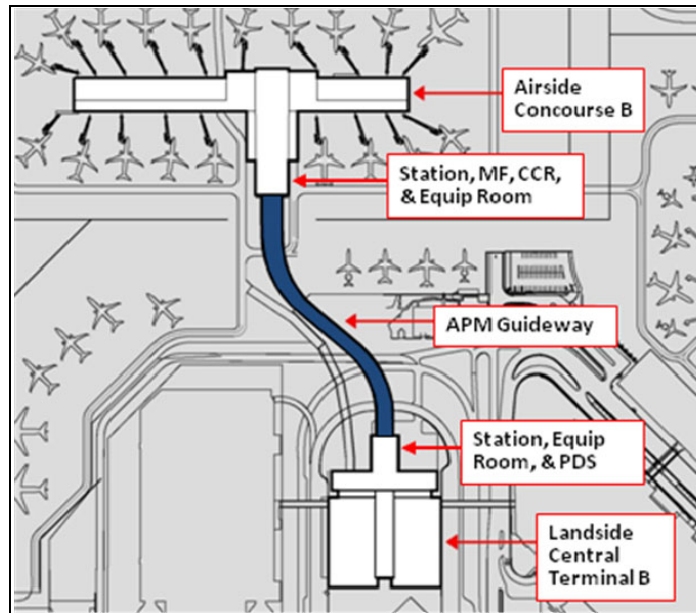


Figure 1: SMF APM System and Facility Configuration

The APM operates wholly on the SMF property, mostly above the Concourse B apron. It is intended for airline and airport employees/contractors and ticketed passengers only. It is beyond the boarding pass checkpoint, but on the landside of the TSA security screening checkpoint, so departing passengers and their carry-on luggage are not cleared through TSA security. No checked luggage will be on the System. Arriving passengers traveling from Concourse B to Central Terminal B will be originating from the secure side of the Airport, having cleared security at their airport of origin.

Scheduled maintenance for the System occurs during the night period to minimize interference with passenger service. Any unscheduled maintenance will take place as needed, taking into consideration the need for safe and reliable service for airport patrons and employees.

B. SCDOA/SMF Security

Sacramento International Airport (SMF) Security is achieved via the joint efforts of the Sacramento County Department of Airports; Sacramento County Sheriff's Department, Airport Division; private security companies; and two agencies of the Department of Homeland Security: US Customs and Border Protection (CBP) and the Transportation Security Administration (TSA).

The Sacramento Sheriff's Department provides law enforcement services for the airport and surrounding areas. Deputies work closely with airport staff, airlines, firefighters, Department of Homeland Security, Transportation Administration (TSA), U.S. Customs Border Protection, Federal Aviation Administration, (FAA), as well as other federal and state law enforcement agencies to provide a safe environment at Sacramento International Airport.

Since 1967, the Sacramento Sheriff's Department provided security to the airport, formerly called the Sacramento Metropolitan Airport. The airport was renamed Sacramento International Airport in 1996.

In 1998, the Sheriff's Unit became a Division under the command of a Sheriff's Captain. The events on September 11, 2001 did not deter growth at Sacramento International Airport contrary to the national trend. In 2002, the International Arrivals building was added to accommodate international flights.

As the airport expanded and travelers increased to 9.4 million for year 2015, the Sheriff's Department Airport Division increased staffing to ensure law enforcement meet needs of the growing airport. The airport began expansion of the new modern Central Terminal, known as "The Big Build", in the fall of 2008. The Sheriff's Department Airport Division continues to evolve to provide a safe and enjoyable environment for the traveling public.

4. REVIEW PROCEDURE

Scope of Security Review

Commission Staff conducted its security review in accordance with guidance and training from the Federal Transit Administration (FTA) and Title 49 Code of Federal Regulations, Part 659. Section 659.23 of the Code of Federal Regulations (CFR) defines the requirements for a System Security Plan (SSP) for rail transit agencies.

According to 49 CFR § 659.23, the system security plan must, at a minimum address the following:

- (a) Identify the policies, goals, and objectives for the security program endorsed by the agency's chief executive;
- (b) Document the rail transit agency's process for managing threats and vulnerabilities during operations, and for major projects, extensions, new vehicles and equipment, including integration with the safety certification process;
- (c) Identify controls in place that address the personal security of passengers and employees;
- (d) Document the rail transit agency's process for conducting internal security reviews to evaluate compliance and measure the effectiveness of the system security plan; and
- (e) Document the rail transit agency's process for making its system security plan and accompanying procedures available to the oversight agency for review and approval.

The requirements of section 659.23 serve as the basis for the five security checklists guiding Staff's review of the SCDOA security program. Staff evaluated SCDOA's security plans and procedures to determine whether they meet the requirements of section 659.23. The triennial security review evaluates whether SCDOA has defined necessary security activities, established responsibilities and accountability, set priorities, provided employee training, developed information distribution and controls, and developed monitoring and feedback loops to determine effectiveness of the security plans and procedures.

For the purpose of the security reviews, “security” means the general areas identified in the FTA requirements of section 659.23. Staff inquiries during the review examine whether the processes and procedures SCDOA adopted are implemented in accordance with statute and the SCDOA SSP. Staff does not evaluate SCDOA’s response to specific crimes or events, except during evaluations to assure processes and procedures in place are implemented as intended. Specific crimes and criminal behavior that may occur on trains and stations is outside of scope of the review and are handled by the local Police Department within that jurisdiction.

Each Staff member involved in the security review received training from the FTA. All Staff have taken and successfully passed the Transit System Security training course, which provided in-depth instruction on security plan requirements, typical methods of compliance, and industry best practices.

Moreover, all Staff in the Rail Transit Safety Branch take the FTA’s Rail System Security course as part of their overall training. This allows Staff members out in the field to promptly identify security concerns when conducting general oversight activities or inspecting transit agency facilities and operations, not just during the triennial security review period. Staff evaluates and identifies security issues in the field, which are immediately discussed with the appropriate transit agency personnel to initiate the process for addressing the concern.

Review Procedure

Staff conducted the 2019 security review in accordance with Rail Transit Safety Branch Procedure RTSB-4, Procedure for Performing On-Site Triennial Safety and Security Reviews of Rail Transit Systems, and G.O. 164-E, Section 4, Requirements for System Security Plans. Staff developed five checklists to cover various aspects of system security responsibilities, based on Commission and FTA requirements, (49 C.F.R § 674.27, et seq., SCDOA SSP, security-related SCDOA documents, Department of Homeland Security, Transportation Security Administration (TSA) baseline review list, TSA “sensitive security information (49 C.F.R. § 1520 et seq.), and the knowledge of Staff of SCDOA operations. A list of the five checklists is provided in Appendix B. The completed checklists are shown in Appendix D.

Each checklist identifies security-related elements and characteristics that were either inspected or reviewed by Staff. Each checklist references Commission, SCDOA, and other documents that establish the security program requirements. The methods used to perform the review included:

- Discussions and interviews with SCDOA Security personnel;
- Review of rules, procedures, policies, and records;
- Interviews with rank and file employees.

Immediately following the security review, Staff summarized the findings and the preliminary recommendations (if appropriate) with involved SCDOA personnel. The post-review summary is beneficial to clarify findings or best-practices and provides SCDOA an opportunity to promptly address any necessary security improvements.

5. FINDINGS AND RECOMMENDATIONS

The reviewers who participated in the On-Site System Security Review identified no findings of non-compliance and made no recommendations to SCDOA regarding its system security program and its implementation. The review results are derived from documents reviewed and issues discussed with SCDOA personnel.

Following are the findings and recommendations for each checklist:

1. Identify Policies, Goals, and Objectives

No findings of non-compliance; no recommendations.

2. Process for Management of Threats and Vulnerabilities

No findings of non-compliance; no recommendations.

3. ID Concepts for Passenger and Employee Security

No findings of non-compliance; no recommendations.

4. Process for Internal Security Reviews

No findings of non-compliance; no recommendations.

5. Process for Generating its Security Plan

No findings of non-compliance; no recommendations.

**APPENDIX A
ACRONYMS LIST**

Abbreviation / Acronym	Description
APM	Automated People Mover
ARFF	Aircraft Rescue and Firefighting
BOS	Sacramento Board of Supervisors
CAP	Corrective Action Plan
CBP	U.S. Customs Border Patrol
CFR	Code of Federal Regulations
Commission	California Public Utilities Commission
CPUC	California Public Utilities Commission
DHS	Department of Homeland Security
FAA	Federal Aviation Administration
FBI	Federal Bureau of Investigation
FTA	Federal Transit Administration
GO	General Order
ISA	Internal Security Audit
RSD	Rail Safety Division
RTSB	Rail Transit Safety Branch
SCDOA	Sacramento County Department of Airport
SSC	Safety and Security Committee
SMF	Sacramento International Airport
SSD	Sacramento Sheriff's Department
SSP	System Security Plan
STA	Security Threat Assessment
Staff	Rail Safety Division personnel
TSA	Transportation Security Administration
TVA	Threat and Vulnerability Assessment

APPENDIX B
SCDOA 2019 TRIENNIAL SECURITY REVIEW CHECKLISTS INDEX

- 1 Identify Policies, Goals, and Objectives
- 2 Process for Management of Threat and Vulnerability Assessments (TVA)
- 3 ID Concepts for Passenger and Employee Security
- 4 Process for Internal Security Reviews
- 5 Process for Generating its Security Plan

APPENDIX C

SCDOA 2019 TRIENNIAL SECURITY REVIEW CHECKLISTS

2019 CPUC SYSTEM SECURITY REVIEW CHECKLIST FOR SACRAMENTO COUNTY DEPARTMENT OF AIRPORTS AUTOMATED PEOPLE MOVER (SCDOA APM)

Checklist	1	Identify Policies, Goals, and Objectives	
Date of Review	May 21, 2019	Department	SCDOA Security Program
CPUC Reviewer	Michael Warren Rupa Shitole Joey Bigornia Matt Ames	SCDOA Persons Contacted	David Delemos, Facilities Coordinator Kathy Sutton, Assoc. Adm. Analyst II Reid Smith, SCDOA Security Matt Ogden, APMS Contractor Mngr.

REFERENCE CRITERIA

1. SCDOA System Security Plan, effective February 2016, rev. 6
2. CPUC General Order 164-D, Section 4.0
3. CPUC General Order 164-E, Section 4.0
4. 49 CFR Part 659, Section 659.23

ELEMENT, CHARACTERISTICS, AND METHOD OF VERIFICATION

Identify Policies, Goals, and Objectives

Interview the SCDOA Security Team responsible for policies, goals and objectives to verify for the past three years:

1. SCDOA management promotes security throughout the organization and enforces related rules, policies, and procedures throughout their areas of control
2. SCDOA has ensured compliance with the Airport Security Program
3. SCDOA heightens security awareness among all employees, contractors, and passengers of the APM
4. SCDOA has developed relations and coordination with local law enforcement and emergency response agencies
5. SCDOA prevents security breaches and effectively resolves those that do occur
6. SCDOA ensures new processes, modifications and changes in operations do not degrade system security
7. SCDOA encourages employees, APM contractors and airport patrons to report suspicious activities and occurrences

ACTIVITIES, FINDINGS, AND RECOMMENDATIONS

Activities:

Staff interviewed SCDOA APM Security Personnel responsible for policies, goals and objectives and determined the following:

1. The entire Airport Security Program (ASP) has access plans, badges issued for employee access, training requirements, and governing rules, policies and procedures throughout the system. The Automated People Mover System (APMS) is not considered to be within the secured area, but the passengers must have a plane ticket to access the contained area. The Safety and Security Committee (SSC) monthly meetings are held with Sheriff and other airport personnel who need to attend. Security is managed by use of security badges and these are monitored continuously. The system can flag and monitor certain badges. Training is about 2-3

hours in length covering safety and security and discusses security aspects, active shooters, and other security awareness.

2. Transportation Security Administration (TSA) has established requirements for the ASP. TSA is a part of the Airport Security and regularly tests the security of the airport and audits SCDOA bi-annually or as needed. TSA reviews the ASP regularly.
3. SCDOA personnel and contractors have a briefing on any heightened alerts and pamphlets are distributed for details. Awareness training for bomb threats is provided and public awareness announcements are made. SCDOA provides its personnel and contractors need to know information and need to access for badging areas.
4. SCDOA has its own Sheriff Unit, available 24/7 and provides entire airport coverage. Additional local law enforcement help is also available if needed and the Fire Department is also on-site at the airport. Training is provided to all these emergency responders as needed. Both the Sheriff Unit and Fire Department are represented in the SSC.
5. Within two minutes, all responders are in effect if there is a security breach on the guideways. APM had no security breaches for the last three years. Once a month, a passenger might accidentally get on the guideway, but the alarms are activated immediately.
6. There have been no modifications for the last three years. Refer to SCDOA 2019 Triennial Safety Checklist #7 for more details. If rules have been modified, the APMS Contractor has reviewed and approved them along with SCDOA personnel and SSC members, all are updated as needed. Any new changes are discussed at the SSC meetings. The APMS Contractor also reviews and comments on any rule changes and or any modifications. No modifications to the APMS have occurred for the last three years.
7. SCDOA has audible notifications playing constantly at the airport reminding everyone to be alert regarding suspicious activities. SCDOA also reminds personnel and contractors to display their badge properly and to challenge personnel about badges outside the APMS. No suspicious occurrences have occurred on the system for the last three years.

Findings:

None

Comments:

None

Recommendations:

None

2019 CPUC SYSTEM SECURITY REVIEW CHECKLIST FOR SACRAMENTO COUNTY DEPARTMENT OF AIRPORTS AUTOMATED PEOPLE MOVER (SCDOA APM)

Checklist	2	Process for Management of Threat and Vulnerability Assessments (TVA)	
Date of Review	May 21, 2019	Department	SCDOA Security Program
CPUC Reviewer	Joey Bigornia Michael Warren Rupa Shitole Matt Ames	SCDOA Persons Contacted	David Delemos, Facilities Coordinator Kathy Sutton, Assoc. Adm. Analyst II Reid Smith, SCDOA Security Matt Ogden, APMS Contractor Mngr.

REFERENCE CRITERIA

1. SCDOA System Security Plan, effective February 2016, rev. 6
2. CPUC General Order 164-D, Section 4.0
3. CPUC General Order 164-E, Section 4.0
4. 49 CFR Part 659, Section 659.23

ELEMENT, CHARACTERISTICS, AND METHOD OF VERIFICATION

Process for Management of Threat and Vulnerability Assessments (TVA)

Interview the SCDOA representatives responsible for the Security Enforcement and review the SSP and TVAs for the past 3 years to determine if:

1. SCDOA's Chief Administrator Officer has complete knowledge of the system and is familiar with any crimes that impact the system;
2. SCDOA performed Threat and Vulnerability Assessments identifying key assets, potential threats, and system vulnerabilities and:
 - a. Identified a list of vulnerabilities to the critical assets.
 - b. Analyze the potential impacts of each threat and vulnerability scenario
 - c. Developed countermeasures and corrective actions at the completion of the process to eliminate or mitigate identified system vulnerabilities.
3. SCDOA's Manager of Security and Operations:
 - a. Evaluated all assessment findings and proposed countermeasures
 - b. Determined if, where, and when countermeasures should be implemented
 - c. Tracks all corrective actions taken to address potential threats and vulnerabilities.
4. SCDOA's APM security testing and inspection activities are conducted periodically by the SCDOA Manager of Security, and the APM Contractor Manager to:
 - a. Assess the state of the System Security Plan
 - b. Monitor the effectiveness of countermeasures implemented to eliminate or control threats and vulnerabilities
 - c. Identify any other potential threats and vulnerabilities within the System

- d. Evaluate the System's state of security preparedness with regards to equipment and resource availability, employee proficiency and levels of training, local law enforcement and emergency response agency system knowledge and response capabilities
- e. Enhance and promote security awareness throughout the System's operations and staff.

ACTIVITIES, FINDINGS, AND RECOMMENDATIONS

Activities:

Staff interviewed SCDOA APM responsible for Threat and Vulnerability Assessments and determined the following:

1. SCDOA states no crimes have been reported at the APMS.
2. A TVA was initially performed in 2011 prior the APMS construction. Staff was presented with a Memorandum from Airport Security Manager to SCDOA dated January 9, 2012 which identified the TVA that occurred on January 19, 2012. TVA participants included the FBI Joint Terrorism Task Force, the TSA federal Security Director, DHS Protective Security Advisor, Cal Emergency Management Agency, Central CA Intelligence Center, Sacramento County Sheriff's Department, Sacramento County Airport System Aircraft Rescue and Firefighting, West Sacramento City Fire Department, Sacramento City Fire Department. Findings indicate APM design and construction is consistent with GO 164-D requirements which was in effect at that time. SCDOA presented Staff with the Sacramento County Airport System memorandum, Inter-Department Correspondence from the Airport Security Manger regarding Vulnerability Assessment, dated January 23, 2012.

SCDOA also reports multi-agency tabletop exercises have occurred and the latest are documented by 2019 Triennial Safety Checklist No. 11.

3. APM Contractor Manager doesn't have any input, obligation or requirement to accept a TVA. Sacramento Airport is responsible for accepting the TVA. Since then, there hasn't been any corrective action plans (CAPs) required or necessary.

APM provided a list of the established National Incident Management (NIM) Positions (e.g. Finance Chief, Logistics Chief, Planning, Red Cross, Airlines, Operations Policy Group, DOC Facilitator, etc.) if any major incident occurs. The NIM position list is a standardized requirement for all airports.

4.
 - a. SCDOA Personnel report an audit is performed every year with a frequency of at least twice a year. The audit can be safety related in addition to security.
 - b. Emergency pushbuttons throughout the airport and in the APM interior are all audible for sensitive areas.
 - c. Security response training occurs with the APM Contractor (system wide)
 - 2019 Security Tabletop Exercise (STTE) occurred May 9, 2019; sign-in sheet documents this.
 - 2018 STTE occurred on August 29, 2018, sign-in sheet documents this.
 - 2017 STTE occurred on July 12, 2017, sign-in sheet documents this.
 - d. Joint training occurs for first responders for the APM system - see Safety Checklist #11. Standard Operating Procedures (SOPs) are in place for operations employees.
 - e. Security Awareness training – see Security Checklist #1

Findings:

None

Comments:

None

Recommendations:

None

2019 CPUC SYSTEM SECURITY REVIEW CHECKLIST FOR SACRAMENTO COUNTY DEPARTMENT OF AIRPORTS AUTOMATED PEOPLE MOVER (SCDOA APM)

Checklist	3	ID Concepts for Passenger and Employee Security	
Date of Review	May 21, 2019	Department	SCDOA Security Program
CPUC Reviewer	Rupa Shitole Joey Bigornia Michael Warren Matt Ames	SCDOA Persons Contacted	David Delemos, Facilities Coordinator Kathy Sutton, Assoc. Adm. Analyst II Reid Smith, SCDOA Security Matt Ogden, APMS Contractor Mngr.

REFERENCE CRITERIA

1. SCDOA System Security Plan, effective February 2016, rev. 6
2. CPUC General Order 164-D, Section 4.0
3. CPUC General Order 164-E, Section 4.0
4. 49 CFR Part 659, Section 659.23

ELEMENT, CHARACTERISTICS, AND METHOD OF VERIFICATION

ID Concepts for Passenger and Employee Security

Interview the SCDOA representatives responsible for the security & communication with Department of Homeland Security involvement, review the security incident reporting program for the past three years to determine if:

1. SCDOA employees and contractors undergo security badging and background checks
2. SCDOA trains its employee and contractors related to security knowledge and training (Initial and refresher)
3. SCDOA has security breach incident reporting program and courtesy phones for passengers to report security breaches/incident notification;
4. SCDOA tracks and resolves all internal and external reported security issues until completion via the APM Safety and Security Committee;

ACTIVITIES, FINDINGS, AND RECOMMENDATIONS

Activities:

Staff interviewed SCDOA APM representatives responsible for passenger and employee security and determined the following:

1. SCDOA APM Security and Communication Department is responsible for security badge issuance and background checks for all new employees and contractors during the hiring process. Badges and access to secure locations are issued depending on job function needs. Additionally, the Department conducts a criminal history record check for everyone before the hiring process is finalized. TSA performs a Security Threat Assessment check and denial is based upon a 10-year criminal history record; however, any issue beyond 10 years does not affect the hiring of a person. SCDOA uses a real time monitoring system of criminal

activity called Rapback to monitor their current employees and contractors for any new activity on their individual record. Rapback is an FBI Service that sends notifications of subsequent activity of individuals who hold positions of security and trust within agencies.

2. SCDOA APM trains all their employees and contractors on an annual basis. The training is divided into various categories such as badge training (one hour), computer-based training (1-2 hours), etc. and everyone must take the test after training is complete and must obtain a 100% passing score. The refresher training is conducted on an annual basis. Staff reviewed training records for Badge 38283 related to security retraining of SIDA version 1.14. Review of those records show that SCDOA APM training policies and procedures are being followed.
3. SCDOA APM has radios and courtesy phones available for passengers and employees to use throughout the system in case of security breaches and or incidents. All security breaches and incidents are discussed at the Safety and Security Committee (SSC) meetings.
4. SCDOA APM holds SSC meetings every two months to discuss the safety and security issues that have occurred during that period. The CPUC assigned representative is also invited to attend these meetings and attends most. Standing agenda items include breaches, mechanical failures, annual exercises, CPUC ongoing updates, etc. Minutes are distributed after the meeting for participants and invitees. Staff reviewed the following SSC meeting minutes dated:
 - November 29, 2018
 - May 21, 2018
 - January 31, 2019
 - March 11, 2019

Findings:

None

Comments:

None

Recommendations:

None

2019 CPUC SYSTEM SECURITY REVIEW CHECKLIST FOR SACRAMENTO COUNTY DEPARTMENT OF AIRPORTS AUTOMATED PEOPLE MOVER (SCDOA APM)

Checklist	4	Process for Internal Security Audit Reviews	
Date of Review	May 21, 2019	Department	SCDOA Security Program
CPUC Reviewer	Rupa Shitole Joey Bigornia Michael Warren Matt Ames	SCDOA Persons Contacted	David Delemos, Facilities Coordinator Kathy Sutton, Assoc. Adm. Analyst II Reid Smith, SCDOA Security Matt Ogden, APMS Contractor Mngr.

REFERENCE CRITERIA

1. SCDOA System Security Plan, effective February 2016, rev. 6
2. CPUC General Order 164-D, Section 4.0
3. CPUC General Order 164-E, Section 4.0
4. 49 CFR Part 659, Section 659.23
5. SCDOA Internal Security Audit Program

ELEMENT, CHARACTERISTICS, AND METHOD OF VERIFICATION

Process for Internal Security Audit Reviews

Interview the SCDOA representatives responsible for the Internal Security Audit Process (ISAP), review the procedure and the audit reports for the past 3 years to determine if:

1. SCDOA annually performed an internal security review;
2. SCDOA addressed all of the required security program elements within the past audit cycle, typically 3 years;
3. SCDOA made the internal security audit schedule available to CPUC Staff 30-days before scheduling;
4. SCDOA's Internal Security Audit (ISA) annual report includes the findings and corrective actions;
5. SCDOA submits its ISA annual report to its management (SCDOA Director and others) for review, approval and certification. A copy of the ISA report is submitted to CPUC Staff in order to demonstrate SCDOAs compliance with its SSP;
6. SCDOA prepares, implements, and tracks the corrective action plans and schedules to completion.

ACTIVITIES, FINDINGS, AND RECOMMENDATIONS

Activities:

Staff interviewed SCDOA APM representatives responsible for Internal Security Audit Reviews and determined the following:

1. SCDOA APM representatives performed annual internal security reviews as required. During CY 2018, SCDOA APM performed audits related to System Security Plan (SSP) elements 1, 2, 3, 5, 7, in CY 2017 performed SSP

elements 8, 9, 10, 11 and CY 2016 performed SSP elements 4 and 6.

2. SCDOA APM conducted all the required System Security Plan elements during CY 2016-2018.
3. CPUC representative was provided 30 days in advance notice before scheduling of the security audits. Staff reviewed records for verification of compliance.
4. CPUC Staff reviewed the annual reports related to internal security audits conducted by SCDOA APM representatives and submitted to CPUC for CY 2016-2018. At the end of each annual report, Appendix F describes the findings and corrective action plans if any. CPUC staff noted that during CY 2016, internal security audit related to SSP element 4 identified one recommendation and during CY 2018, SSP element 5 identified one recommendation as well. SCDOA representatives clarified that a recommendation is considered a comment only since it had no correlation to a finding. Therefore, SCDOA did not require any corrective action plans for the two recommendations.
5. SCDOA APM representatives submit the ISA annual report to its management for review, approval, and certification. CPUC Staff reviewed the following internal security audit annual reports:
 - Annual Report for CY 2016 – The report was issued on January 15, 2017 and signed off by SCDOA APM managers and Chief Administration Officer. CPUC acceptance letter was not completed by the CPUC designated representative during CY 2017. No record on file.
 - Annual Report for CY 2017 – The report was issued on December 12, 2017 and signed off by SCDOA APM managers and Chief Administration Officer. CPUC acceptance letter dated May 25, 2018 was on file.
 - Annual Report for CY 2018 – The report was issued on December 12, 2018 and signed off by SCDOA APM managers and Chief Administration Officer. CPUC acceptance letter dated March 8, 2019 was on file.
6. SCDOA APM representatives stated that there has been no corrective action plan issued for the last three years. The recommendation as described in (4) above is considered as a comment by SCDOA APM representatives.

Findings:

None

Comments:

CPUC Staff discussed with SCDOA representatives that if a report has a recommendation according to FTA practices, Staff would treat that as an action item and follow up with a corrective action plan to close it out. CPUC suggests SCDOA APM clearly define in their procedures that a recommendation is also considered as a comment and may not always have a corrective action requirement. Staff suggested to SCDOA to perhaps add a comments section to their checklists moving forward.

Recommendations:

None

2019 CPUC SYSTEM SECURITY REVIEW CHECKLIST FOR SACRAMENTO COUNTY DEPARTMENT OF AIRPORTS AUTOMATED PEOPLE MOVER (SCDOA APM)

Checklist	5	Process for Updating/Generating its Security Plan	
Date of Review	May 21, 2019	Department	SCDOA Security Program
CPUC Reviewer:	Rupa Shitole Joey Bigornia Michael Warren Matt Ames	SCDOA Persons Contacted	David Delemos, Facilities Coordinator Kathy Sutton, Assoc. Adm. Analyst II Reid Smith, SCDOA Security Matt Ogden, APMS Contractor Mngr.

REFERENCE CRITERIA

1. SCDOA System Security Plan, effective February 2016, rev. 6
2. CPUC General Order 164-D, Section 4.0
3. CPUC General Order 164-E, Section 4.0
4. 49 CFR Part 659, Section 659.23

ELEMENT, CHARACTERISTICS, AND METHOD OF VERIFICATION

Process for Updating/Generating its Security Plan

Interview the SCDOA representatives responsible for the System Security Plan (SSP) administration, review the SSP implementation, and update process of the SSP for the past 3 years to determine if:

1. The SCDOA SSP is certified by SCDOA Director, SCDOA Chief Administrative Officer, SCDOA APM System Manager, SCDOA Manager of Security and Communications;
2. SCDOA annually reviewed its SSP and updated SCDOA SSP as needed;
3. SCDOA sent a letter to the Commission Staff detailing plan modifications, if any;
4. SCDOA has an existing process for revising the SSP (found in day-to-day operation, internal concerns, external concerns and or FAA/TSA rules);
5. SCDOA has an existing process to track all Corrective Action Plan(s) incorporated, or to be incorporated, in the SSP from beginning to end;
6. SCDOA Manager of Security has an existing process to communicate and disseminate new and revised procedures of the SSP to SCDOA personnel.

ACTIVITIES, FINDINGS, AND RECOMMENDATIONS

Activities:

Staff interviewed SCDOA APM representatives responsible for updating and generating its Security Plan and determined the following:

1. SCDOA APM representative stated that based on the audit in CY 2016, APM reviewed its System Security Plan (SSP) and looked at the two (2) signatures required for the SSP, one by SCDOA Facilities Manager (APM Chair) and the other APM Contractor Manager. Section 5 of SSP describes the oversight of the SSP.

2. SCDOA APM SSP was updated as needed. This audit was based on the February 2016 version of the SSP. Therefore, there were no revisions to the SSP for the last three years. Recently, SCDOA APM submitted their revised SSP version dated 2019 to the CPUC designated representative for review and approval. The CPUC review and approval process of SSP is in progress.
3. SCDOA APM representatives recently submitted their 2019 SSP update revision and a letter to CPUC designated representative for review and approval. The SSP February 2019 revision 7 has a Revision Log Table 1 that shows the description of changes made to the plan.
4. SCDOA SSP Revision log has been updated in the 2019 SSP revision. All changes are described in the revision log. All day to day operations, external and internal concerns are all updated as needed to the SSP.
5. SCDOA APM Corrective Action Plan (CAP) log is maintained that includes items from inspections, ISAs, triennial, etc. CY 2016-2018 CAP log was provided. There are no CAPs open for security findings. All CAPs are discussed at the Safety and Security Committee (SSC) meetings.
6. SCDOA APM System Manager announces the revised SSP at security meetings and at the SSC. The revised SSP is on a secured shared drive and tracks all written edits for members to view electronically. An electronic copy of the revised signed SSP is shared with all employees and contractors after its approval since it is not an SSI document.

Findings:

None

Comments:

None

Recommendations:

None