2017
TRIENNIAL ON-SITE SECURITY REVIEW OF SANTA CLARA VALLEY TRANSPORTATION AUTHORITY (VTA)
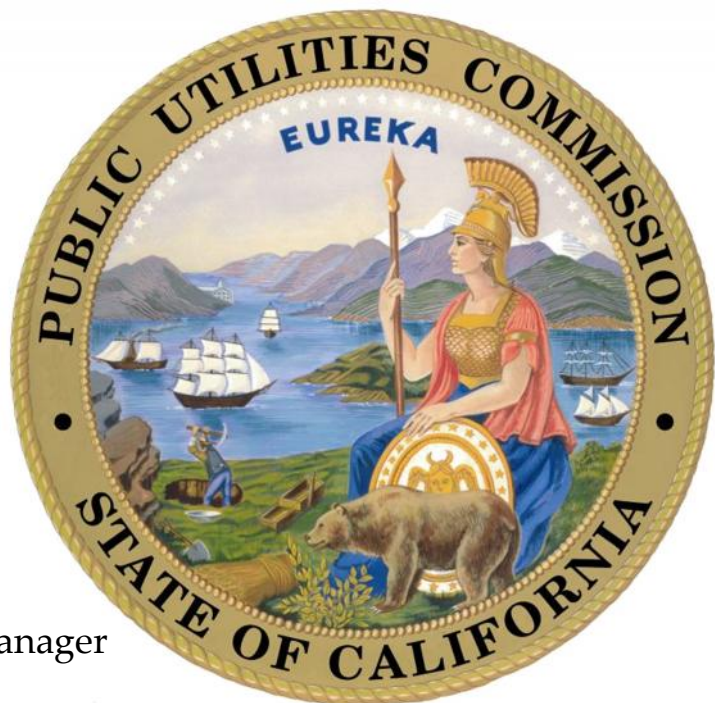
RAIL TRANSIT SAFETY BRANCH
SAFETY AND ENFORCEMENT DIVISION
CALIFORNIA PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102

[PUBLIC REDACTED]

September 27, 2018

Final Report

Daren Gilbert, Program Manager
Rail Transit Safety Branch
SAFETY AND ENFORCEMENT DIVISION

2017 TRIENNIAL ON-SITE SECURITY REVIEW
SANTA CLARA VALLEY TRANSPORTATION AUTHORITY

ACKNOWLEDGEMENT

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

TABLE OF CONTENTS

1. EXECUTIVE SUMMARY

The California Public Utilities Commission's (Commission or CPUC) Safety and Enforcement Division (SED), Rail Transit Safety Branch staff (Staff), conducted an on-site system security program review of the Santa Clara Valley Transportation Authority (VTA) on November 16, 2017.   The review focused on verifying the effective implementation of the VTA Security and Emergency Preparedness Plan (SEPP), or System Security Plan (SSP), and addressing Threat & Vulnerability Assessments (TVA) and emergency response.

On November 6, 2017, Staff held an opening conference with VTA personnel. Staff commenced the 2017 VTA triennial on-site security review on November 16, 2017.

Following the on-site evaluation, Staff held a post-review conference with VTA personnel on December 14, 2017.   Staff summarized the preliminary review findings with VTA personnel and indicated no issues of non-compliance were found during the review.   As a result, Staff made no recommendations for corrective action following the Triennial Security Review.

The Introduction and Background Sections of this report, which contains a discussion on the scope of the triennial security audit and a description of the VTA rail system, are presented in Section 2 and 3, respectively. Section 4 describes the review procedure.   The review's findings and recommendations are listed in Section 5. The 2017 VTA Triennial Security Review Acronyms List is found in Appendix A, Checklist Index in Appendix B, Recommendations List in Appendix C and Review Checklists in Appendix D.

This report reflects Staff's triennial security review. The VTA on-site triennial safety review report will be contained in a separate Report and will be concurrently brought before the Commission for approval in Resolution ST-210.

2. INTRODUCTION

The Commission's General Order (GO) 164-E[1] *Rules and Regulations Governing State Safety Oversight of Rail Fixed Guideway Systems*, Section 4, *Requirements for System Security Plans* and the Federal Transit Administration's (FTA) Rule, Title 49 Code of Federal Regulations (CFR) Part 659.21-659.29, *Rail Fixed Guideway Systems: State Safety Oversight*, require the designated State Safety Oversight Agencies to perform a review of each rail transit agency's system safety and security program(s) at a minimum of once every three years. The Commission's triennial security review verifies compliance and evaluates the effectiveness of each rail transit agency's System Security Plan (SSP) or Security and Emergency Preparedness Plan (SEPP) to assess the level of compliance with GO 164-E and other Commission safety and security requirements. Staff conducted the previous VTA on-site security review in October 2014.

In a letter dated October 6, 2017, Staff advised VTA General Manager that the Commission's triennial safety and security review would commence on November 6, 2017. The letter included five checklists detailing the scope of review and outlining the elements for the security inspection: Identify Policies, Goals, & Objectives, Process for Management of Threats and Vulnerabilities, Identify Concepts for Passenger and Employee Security, Process for Internal Security Reviews, and Process for Generating the Security Plan.

---

[1] GO 164-D was in effect at the time of the October 23, 2017, Triennial Security Review visit at VTA. It has since been updated by GO 164-E. There is no significant difference between GO 164-D and GO 164-E with respect to the requirements regarding Triennial System Security Reviews for Rail Transit Agencies.

Staff held an opening conference on November 6, 2017 with VTA General Manager, Executive Management, Superintendents, Supervisors, and Protective Services personnel.

On November 16, 2017, Staff conducted its triennial on-site security inspection and records review. Prior to the visit, Staff developed five (5) checklists for the inspection of the System Security Plan. Staff derived the checklist based on the requirements of the Commission's GO 164, the federal guidelines established in 49 CFR 659, the Transportation Security Administration's (TSA) Baseline Security Review, and VTA's SEPP. At the conclusion of each review activity, Staff provided VTA personnel with a verbal summary of the preliminary findings and discussed preliminary recommendations for corrective actions, if any.

On December 14, 2017, Staff held a post-review exit meeting with VTA's executive and department managers. Staff provided the attendees a synopsis of the findings from the five checklists. Staff notified the attendees that since the security review did not demonstrate any issues of non-compliance, Staff makes no recommendations at this time.

3. BACKGROUND

Scope of Security Review

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

> **§ 659.23 System security plan: contents.**
> 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 legislative mandate forms the basis for the five security checklists that guided Staff's review of the VTA security program. Staff evaluated the VTA security plans and procedures to determine whether VTA's processes and procedures meet the requirements of 49 CFR 659.23. The triennial security review evaluates whether VTA 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 49 CFR 659.23. Staff inquiries during the review examine whether the processes and procedures VTA adopted are in accordance with 49 CFR 659.23, and implemented in accordance with the VTA

SSP. Staff does not evaluate VTA's response to specific crimes or events, except during its assessment to ensure processes and procedures in place are implemented as intended. Specific crimes and criminal behavior that may occur on trains and stations is considered 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 has taken and successfully passed the FTA's Transit System Security training course, which lays out the requirements for security plans and instructs participants in the typical methods of compliance and industry best practices.

Moreover, all Staff in the Rail Transit Safety Branch take the Rail System Security course as part of their overall training. This allows for Staff members to identify security concerns out in the field when conducting oversight and inspecting transit agency facilities and operations at all times, not just during the triennial security review period. When out in the field, Staff evaluate security issues each time, and concerns are identified and discussed with the transit agency immediately to initiate the process to remediate the problem.

VTA Rail System

The Santa Clara Valley Transportation Authority (VTA) is an independent special transit district that provides transit services to the region, including rail transit service. VTA provides bus, light rail, and paratransit services, as well as participates as a funding partner in regional rail service including Caltrain, Capitol Corridor, and the Altamont Corridor Express. As the county's congestion management agency, VTA is responsible for countywide transportation planning, including congestion management, design and construction of specific highway, pedestrian, and bicycle improvement projects, as well as promotion of transit-oriented development.

The Board of Directors has 18 members, including six ex-officio members, all of whom are elected officials appointed to serve on the Board by the jurisdictions they represent. Fifteen Directors are city council members and three are county Supervisors. Twelve Directors serve as voting members and, and there are six Directors who serve as alternates. The ex-officio members are non-voting members and three of them represent Santa Clara County on the Metropolitan Transit Commission (MTC).

VTA currently operates an urban transit service with a fleet of diesel, hybrid diesel-electric buses and light rail vehicles within Santa Clara County. VTA's service coverage is 346 square miles, serving 15 cities in Santa Clara County with a population of nearly 2 million. Historic trolley service is also provided in the downtown San Jose Transit Mall on a seasonal basis.

The VTA rail system consists of the Guadalupe, Tasman West, Tasman East, Capitol and Vasona Lines (See VTA Light Rail System Map) with two other proposed extensions. The total operating system is about 42.2 miles with 61 Light Rail Stations. The average weekday ridership of the light rail system was approximately 29,262 passengers per day in Fiscal Year 2017.

VTA LIGHT RAIL SYSTEM MAP

Guadalupe Line

The 21-mile Guadalupe light rail line began service in 1991, which extends from south San Jose, into downtown and continues to employment centers of north San Jose and Santa Clara. The Downtown Transit Mall in San Jose serves as a hub for rail/bus connections. Light rail and Caltrain service connects at the Tamien Station in San Jose. The Guadalupe Line has 27 light rail stations.

Tasman West Line

The 7.6-mile Tasman West light rail line began service in 1999, which travels through four cites: San Jose, Santa Clara, Sunnyvale, and Mountain View serving major employment centers of Silicon Valley. It links with Caltrain in Downtown Mountain View. In August 2014, VTA started providing light rail and bus service to the new Levi's Stadium for large events. Levi's Stadium is located near the Great America Light Rail Station. The Tasman West Line has 16 light rail stations.

Tasman East Line

The Tasman East light rail line is a 4.8-mile extension from North First Street to Hostetter Road which travels through the cities of San Jose and Milpitas. The first phase, a 1.9-mile extension from North First Street to I-880 along the median of Tasman Drive opened for revenue service in May 2001 and marked the beginning of VTA light rail vehicles in the City of Milpitas. The second phase, a 2.9-mile segment from I-880 to Hostetter Road along the Capitol Avenue median opened for revenue service in June 2004. Approximately 7,200 feet of this segment is grade separated over two railroad crossings, Montague Expressway, and other cross streets. The Tasman East Line has 6 light rail stations.

Capitol Line

The Capitol light rail line, a 3.5-mile extension of the Tasman light rail line opened for revenue service in June 2004. The right-of-way is along Capitol Avenue from just south of Hostetter Road to Alum Rock Avenue, north of Capitol Expressway and operates in the median of Capitol Avenue, with two vehicle travel lanes and a bike lane in each direction paralleling the track way. The Capitol Line has 4 light rail stations.

Vasona Line Extension Project

The Vasona Light Rail Project is a 5.3-mile light rail extension to the existing VTA Light Rail system and operates primarily on the existing Union Pacific Railroad right-of-way. Revenue service began in 2005. The Vasona Line has 8 light rail stations and links with Caltrain, ACE, and Capitol Corridor at Diridon Station.

Current Extensions in planning/construction

Eastridge to BART Regional Connector Project

The Eastridge to BART Regional Connector Project includes a 2.6-mile extension from the existing Alum Rock Station to Eastridge Transit Center. The alignment will be primarily grade separated. The Eastridge to BART Regional Connector Project is being implemented in two phases. Phase I was completed in the Spring of 2015, and included the installation of sidewalk, landscape and street lighting on Capital Expressway from Capital Avenue to Tully Road and the reconfiguration of the Eastridge Transit Center. Phase II will extend light rail from the existing Alum Rock Light Rail Station to the Eastridge Transit Center. Light rail will operate primarily in the center of Capitol Expressway in an elevated track structure from Capitol Avenue to Tully Road. The Eastridge extension will include two stations: Story and Eastridge. Construction will begin in mid-2019 and will be completed in mid-2023.

Vasona Junction Light Rail Extension

Plans include a 1.5-mile extension from Winchester Station into the Town of Los Gatos. A Federal environmental document for the Vasona Light Rail Extension was completed and approved by the Federal Transit Administration (FTA). The schedule for engineering work will resume in early 2018.

BART Silicon Valley Extension Project

The BART Silicon Valley Extension Project is a 16-mile extension of the BART system to Santa Clara County and is being constructed in a phased approach by VTA. Phase I, the Berryessa Extension, is a 10-mile extension, including two BART stations. This extension begins in Fremont, south of the Warm Springs/South Fremont BART Station, and proceeds in the former Union Pacific Railroad right-of-way for the Milpitas Station and then to the Berryessa Station in North San Jose. The Berryessa Extension is scheduled for passenger service in Summer 2019. VTA is completing planning and environmental activities for Phase II of the BART Silicon Valley Extension, which includes a subway tunnel through downtown San Jose. The second construction phase is expected to begin in 2019 with passenger service targeted for 2026. Staff has reviewed, and the Commission granted

Resolution ST-83 approving the Safety and Security Certification Plan for this project.
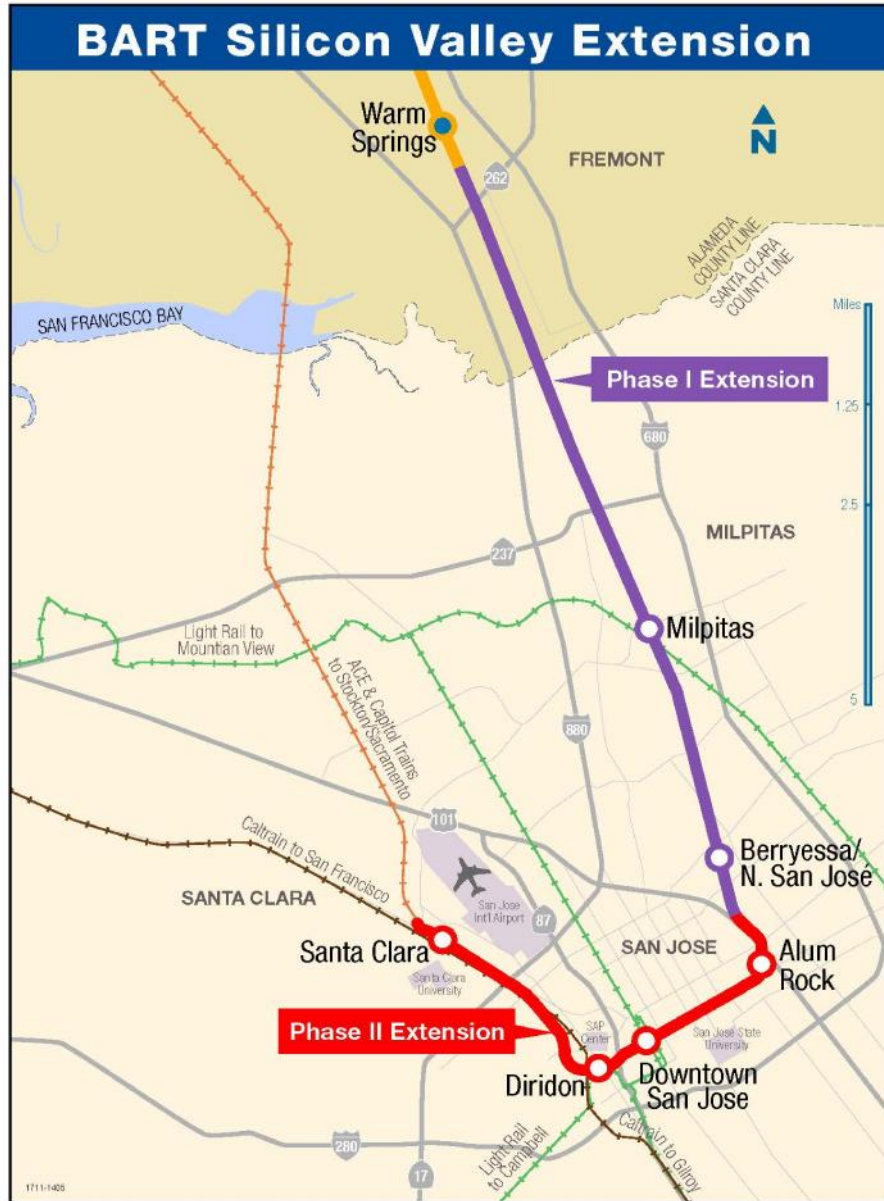
BART SILICON VALLEY EXTENSION PROJECT

VTA Security

VTA asserts that effective security of VTA's transit system is achieved by having a highly visible security presence to protect transit customers, employees, contractors and property. VTA provides system-wide security by a combination of Sheriff Transit Patrol deputies and private security officers. The VTA's Fare Inspection Unit also requests proof of payment from passengers riding VTA's light rail system.

Currently, under the direction of VTA's Chief of Staff to the General Manager, VTA's law enforcement services are under contract with the County of Santa Clara Office of the Sheriff – Transit Patrol Division. VTA contracted with the County of Santa Clara Office of the Sheriff for law enforcement services since October 1990. Sheriff Transit Patrol deputies patrol on duty 24 hours per day and respond to calls for service from armed and unarmed private security officers, Fare Inspectors, Bus and Light Rail Operators and other employees through VTA's Operations Control Center, as well as from passengers using the 911 system.

Universal Protection Services, LP, dba Allied Universal Security Services, is currently VTA's private security contractor providing unarmed and armed security. Allied Universal Security Services provided contract security services to VTA since March 2009. VTA assigns security officers to posts or beats, based on ridership patterns, activities and statistical crime data. Unarmed security officers are assigned to all VTA work facilities and selected transit facilities. These officers also support special events serviced by VTA, providing a visible security presence on ride light rail trains and buses. Armed security officers patrol VTA facilities and light rail stations, in addition to supporting special events serviced by VTA, Lost and Found, CCTV programs and revenue collection services.

In addition to Transit Patrol and contract security, VTA also organizes a team of Fare Inspectors to randomly board the light rail trains to enforce VTA's fare policy throughout the system. This team works closely with law enforcement and contract security.

Status of the 2014 VTA Triennial Security Review

Staff performed the previous triennial on-site security review in 2014. Staff identified no Findings or Recommendations during that review. CPUC Resolution ST-172, adopted February 25, 2016, granted Commission approval of Staff's final 2014 VTA Triennial On-Site Security Review report.

4. SECURITY REVIEW PROCEDURE

Staff conducted its 2017 security review in accordance with Rail Transit Safety Section 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 (5) checklists to cover various aspects of system security responsibilities, based on Commission and FTA requirements (49 C.F.R §§ 674.27, et seq.), the VTA SEPP, security-related VTA documents, Department of Homeland Security and Transportation Security Administration (TSA) baseline review list, TSA "sensitive security information" (49 C.F.R. §§ 1520 et seq.), and the knowledge of Staff of VTA operations. The five checklists are provided in Appendix B. The completed checklists and analysis 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, VTA, and other documents that establish the security program requirements. The methods used to perform the review included:

- Discussions and interviews with VTA executive personnel, including Protective Services management and its contractor, Allied Universal Security
- 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 VTA personnel. The post-review summary is beneficial for clarifying findings or best-practices and provided VTA an opportunity to promptly address any necessary security improvements.

5. FINDINGS AND RECOMMENDATIONS

The triennial on-site security review shows the VTA rail system has a comprehensive SEPP and VTA complies with its plan. The review results are derived from documents reviewed, and issues discussed with management, rank and file employees, and contractors. Overall, the review result confirms VTA is in compliance with its SEPP. The review identified no findings or recommendations from the five checklists. Following are the results for each checklist:

1) **Identify Policies, Goals, and Objectives**

   No findings of non-compliance; no recommendations

2) **Process for Managing 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) **Security Interaction with the Public**

   No findings of non-compliance; no recommendations.

APPENDICES

APPENDIX A

ABBREVIATION and ACRONYM LIST

Abbreviation / Acronym	Description
BSIS	Bureau of Security and Investigative Services
CAP	Corrective Action Plan
CalOES	California Office of Emergency Services
CCTV	Closed Circuit Television
CFR	Code of Federal Regulations
Commission	California Public Utilities Commission
CPUC	California Public Utilities Commission
DHS	Department of Homeland Security
EOC	Emergency Operations Center
ECCTA	Eastern Contra Costa County Transit Authority
FTA	Federal Transit Administration
GO	General Order
ISA	Internal Security Audit
MTC	Metropolitan Transportation Commission
NIMS	National Incident Management System
OCC	Operations Control Center
RSSRB	Rail System Safety Review Board
RTSB	Rail Transit Safety Branch
SED	Safety and Enforcement Division
SEPP	Security and Emergency Preparedness Plan
Staff	Rail Transit Safety Branch personnel
TTX	Table Top Exercise
TVA	Threat and Vulnerability Assessment
VTA/SCVTA	Santa Clara Valley Transportation Authority

APPENDIX B
2017 VTA TRIENNIAL SECURITY REVIEW CHECKLIST INDEX

Checklist No.	Department	Element/Characteristics
1	VTA Protective Services	Identify Policies, Goals, and Objectives
2	VTA Protective Services	Process for Management of Threats and Vulnerabilities
3	VTA Protective Services	ID Concepts for Passenger and Employee Security
4	VTA Protective Services	Process for Internal Security Reviews
5	VTA Protective Services	Process for Generating its Security Plan

APPENDIX C

2017 VTA TRIENNIAL SECURITY REVIEW
RECOMMENDATIONS LIST

No.	Recommendation	Checklist No.
	None.	

APPENDIX D

2017 VTA TRIENNIAL SECURITY REVIEW CHECKLISTS

2017 CPUC SYSTEM SECURITY REVIEW CHECKLIST FOR SANTA CLARA VALLEY TRANSPORTATION AUTHORITY

Checklist No.	1	Subject	Identify Policies, Goals, and Objectives
Date of Review	November 16, 2017	Department	Protective Services
Reviewers/ Inspectors	███████ ███████	Person(s) Contacted	███████████████

REFERENCE CRITERIA

1. General Order 164-D
2. Security and Emergency Preparedness Plan (SEPP), Dated February 2016

ELEMENT/CHARACTERISTICS AND METHOD OF VERIFICATION

Identify Policies, Goals, and Objectives

Interview the person(s) in charge of Security Policies, Goals and Objectives at VTA. Review and evaluate the various documents as indicated below for the past three years to determine if:

1. The VTA SEPP is certified by VTA General Manager, Director of System Safety and Security, Office of the Sheriff, and Manager of Security Programs;

2. VTA introduced solutions to minimize the transit impacts of natural, technological, and security related incidents;

3. VTA implemented security policies and procedures that can be measured, audited, and evaluated to determine the effectiveness of VTA's security program;

4. VTA has heighten security awareness among all employees, contractors and passengers;

5. VTA continues security assessments documenting results and recommend action items to implement.

RESULTS/COMMENTS

Activities:

Staff interviewed VTA Security and Allied Universal Staff responsible for Identifying Policies, Goals, and Objectives and determined the following:

1. VTA's latest SEPP, dated February 2016, is signed by the General Manager (March 9, 2016), Director of System and Safety Security (March 8, 2016), Office of the Sheriff – Transit Patrol Division (March 7, 2016), Manager of Security Programs (March 7, 2016.

2. Allied Universal Security Services and VTA Protective Services provided Staff with the following information to review:
   - Amendment No. 2 – To Agreement Between Santa Clara Valley Transportation Authority and Universal Protection Services LP, DBA, Allied Universal Security Services for Security and Protective Services, Contract No. S14098 ██████████

[BLACK REDACTION]

ʃ CCTV Bi-Weekly Camera Check, dated April 24, 2017, November 7, 2017, May 15, 2017, May 29, 2017, June 12, 2017, June 26, 2017, July 17, 2017, August 17, 2017, August 28, 2017, September 11, 2017, October 2, 2017 and October 23, 2017, were reviewed. Camera Checks consists of the following:

  Station Name

  Camera Operation

  Camera Angle Status

  Camera # and Issues

[BLACK REDACTION] Staff reviewed a sample S-Unit Report, dated November 15, 2017.

ʃ Amendment No. 5 – To the Agreement Between Santa Clara Valley Transportation Authority and The County of Santa Clara for Law Enforcement Services, Agreement No. S12060. Outlines security responsibilities between SCVTA and County of Santa Clara for Law Enforcement Services, Responsibility Of The County, Compensation, County Requirements (Equal Opportunity/Nondiscrimination, Beverage Nutrition Criteria, No Smoking, Wage Theft Prevention), and Map of Sheriff Jurisdiction.

ʃ System Safety and Security – Protective Services Training [BLACK REDACTION]

████ Topics cover: Security Program Configuration, Fare Inspection on Light Rail, Fare Evasion Rate, Allied Universal – Contract Security, Allied Universal Staffing, Santa Clara County Sheriff's Office Transit Patrol Division, Transit Patrol Staffing, Santa Clara Sheriff's Office Transit Patrol Division, Crimes Against Persons Reports Transit Patrol, Crimes Against Property Reports Transit Patrol, Security Tools and Awareness, See Something Say something, A Guide to Avoid Workplace Violence, Sensitive Security Information, and Protective Services.

- Active Shooter Incidents – Protective Services Management. All new employees, contractors, etc. are required to take this class within 2 months of becoming employed by VTA or working for a contractor employed by VTA. Video demonstrates what to do in an active shooter incident.

- Sterile Zones – Continued Campaign to prevent patrons bringing illegal items on the trains. Also, Public Information Messaging System (PIMS) message boards at all station display basic security messages such as See Something Say Something, Stay Behind the Yellow Lines, Report Suspicious Activities at the following phone 911, etc. Smaller PIMS message boards with audio capabilities are used for operation purposes where the PIMS is mainly used for security.

- SCVTA Security Threat Response Guide – created April 16, 2003, revised June 18, 2016. Operations Control Center (OCC) Controllers use this guide to respond to security issues. Protective Services provides and updates the manuals. The Standard Operations Procedure (SOP) also determines the frequency that Controllers are retrained.

- All-Hazards Awareness and Preparedness for Transit Employees - All new employees, contractors, etc. is required to take this class within 2 months of becoming employed by VTA or working for a contractor employed by VTA.

- Public Security Notices, Intranet, PIMS, Board Meetings, Presentations at various employee meeting, etc. Protective

Services will attend and give presentations as needed.

██

████████████████████████████████████

3. Protective Services and Allied Universal Security provided Staff with the following for review:

⌡ American Public Transportation Association (APTA) letter dated May 26, 2017, acknowledged SCVTA's Security Program "Certificate of Merit (Security)". Letter is signed by APTA President and CEO.

⌡ <u>Office of The Sheriff County Of Santa Clara, Transit Patrol Division</u> CY2017 Quarter 2 Report, Year End Management Report – Fourth Quarter 2015, Year End Management Report – Fourth Quarter 2016. Quarterly reports are incorporated into the Annual Report. Items covered include the following:

Citations - Vehicle Code Cites, Parking Cites, Miscellaneous Cites, Criminal Cites

Arrests – Felony Arrests, Misc. Arrests

Reports – Felony Reports, Misc. Reports

Staffing Issues

Budget

Transit Patrol Crime Report Summary

Transit Patrol Traffic Enforcement Analysis

Transit Patrol Warrants Arrests

Transit Patrol Calls for Service and Response Times

⌡ <u>Rail System Safety Review Board (RSSB)</u> from January 2015 to February 2016 for Staff to review. Protective Services Management attends, presents and discusses any security related issues, concerns, or topics as well as follow up on past incidents.

⌡ <u>Incident Dashboard</u> – Created from Industry Safe, dated January 1, 2014 to November 1, 2017. Security incidents are entered by Allied Security. Security incidents are collected from Security Incident Reports, and Light Rail Occurrence Reports. OCC

enters Unusual Occurrence Reports into Industry Safe.   Data of report includes Collisions, Passenger Fall/Contact with Vehicle, Security, Hazmat Spill, Mics, Alleged, Employee Injury, Near Miss, Rail Crossing Gate, Public Accident, and Pedestrian Injury. Protective Management performs an analysis from the reports along with the Sheriff's reports and moves security and alerts local police to necessary locations.

- ꝰ VTA/ATU Local 265 Joint Safety Committee Meeting – Protective Services Management attends this meeting. Train Operators, Line Managers, etc. can bring up security issues, concerns and topics with Protective Services. Protective Services presents on security topics, solutions, new issues, and does and don'ts. Staff reviewed monthly meeting agenda and minutes from May 2015 to April 2017.

- ꝰ CCTV – See answer to question 2 above, second bullet CCTV.

4. Protective Services and Allied Universal Security presented the following for Staff to review:
   - ꝰ New Employee Orientation – See Item 2, above.
   - ꝰ Protective Service Notices – are sent to all VTA employee and contractors as pertinent and periodically as needed. Staff reviewed various notices from January 2015 to June 2017. If there

are immediate issues ██████████████████████
███
█████████████████████████

⎧ Be On The Look-Out (BOLO) notifications. Posted on the
   bulletin boards at all facilities. Information includes photo of
   person, description of offense, who to contact, and what to do.

⎧ All Hazards Awareness and Preparedness for Transit Employee
   training. See Item 2.

⎧ See Something Say Something – See Item 2.

⎧ PIMS and Sterile Zones – See Item 2. (Sterile Zone is a definition
   from the penal code 171.7(b), which says what is not allowed
   within the zone.)

⎧ Ops Order – Generated for heighten sense of security. ████████
   ███
   ████████████████████

⎧ Incident Action Plan – Sheriff services were provided for
   WrestleMania, dated March 29, 2015. Modeled after ICS but
   from a law enforcement perspective. (Not public record for law
   enforcement only)

5. Protective Patrol and Allied provided the following for review:

████ Public Safety Process Assessment – Auditor General Report No.
     2016-06, dated October 9, 2015. ████████████████████
     ████████████████████████████████
     ███
     ███████████████████████████████████
     ████████
     ████████████████████████████
     ████████████████████████████████

⎧ Office of The Sheriff County Of Santa Clara Transit Patrol
   Division SVBX Transit Patrol Staffing Evaluation ████████████
   ███
   █████████████████████████████

██
████████

███ <u>Shift Summary Report</u> - Allied Universal presented daily reports
to Protective Services via email. The Shift Summary Report
summarized █████████████████████████████████
███████████████████████████████████████
██████████████████████████████████████
████████████████

███ Int████████████████████████████████
██████████████████████

<u>Comments:</u>
      None.

<u>Findings:</u>
      None.

<u>Recommendations:</u>
      None.

2017 CPUC SYSTEM SECURITY REVIEW CHECKLIST FOR SANTA CLARA VALLEY TRANSPORTATION AUTHORITY

Checklist No.	2	Subject	Process for Management of Threats and Vulnerabilities
Date of Review	November 16, 2017	Department	Security (Protective Services)
Reviewers/ Inspectors	██████	Person(s) Contacted	████████████████

REFERENCE CRITERIA

1. General Order 164-D
2. VTA Security and Emergency Preparedness Plan (SEPP), Dated February 2016
3. TSAFTA Security and Emergency Management Action Items for Transit Agencies (Attachment 4-10a)
4. TSA's Security Directive Number SD RAILPAX-04-01, Dated May 20, 2014 (Attachment 6-1)
5. Homeland Security Presidential Directive 7: Critical Infrastructure Identification, Prioritization, and Protection dated September 22, 2015.

ELEMENT/CHARACTERISTICS AND METHOD OF VERIFICATION

Process for Management of Threats and Vulnerabilities

Interview the VTA representatives responsible for the Security Enforcement of Threat and Vulnerabilities. Review the SEPP and TVA related documents for the past three years to determine if:

1. VTA promote analysis and methodologies that encourage safe system operation through identification, evaluation, and resolution of threats and vulnerabilities, including preparedness for acts of terrorism that could involve weapons of mass of destruction, and the ongoing assessment, and the ongoing assessment of agency capabilities and readiness.

2. VTA identifies Threats from internal and external information resources stated in section 6.4.1.

3. VTA develops and implements a Risk Mitigation Process/Program and based on the issues/results of this program, VTA develop and implement appropriate measures to reduce the risks threat action for improving physical security measures and emergency response capabilities by:

    a. Cataloging and prioritizing VTA's assets and infrastructure;

    b. Identifying and evaluating threats to those assets;

    c. Identifying vulnerabilities based on the assets and likely threats; and

    d. Developing, prioritizing, and implementing mitigation measures to reduce the risk to VTA assets;

4. On an annual basis, the Director of System Safety and Security, or designee will determine whether there is the need for full TVA.

5. VTA has conducted a full TVA within the past three years and if the proposed countermeasures were tracked unto completion by the Director of System Safety and Security and the Captain –Transit Patrol Division;

6. VTA continue to share security information at the System Safety and Security staff meetings, including results and recommended action items to be implemented.

█ VTA conducts regular testing and inspections of its facilities and assets. In addition ████████████████████████████████████ ████████████████████

████████████████████████████████

████████████████████████████████ ████████████████████

████████████████████████ ██████████████████

████████████████████████████ █████████████████████████████████ ████████████████████████████████ █

e. ████████████████████████████ ████████████████

RESULTS/COMMENTS

Activities:

Staff interviewed VTA Security and Allied Universal Staff responsible for Management of Threats and Vulnerabilities and determined the following:

█ Allied Universal and Protective Services promote analysis and methodologies that encourage safe system operation and provided the following █████ ████████████████████████████ ████████████████

) Pedestrian Safety at River Oaks, dated April 7, 2016.
 ▇ Security Awareness Reminder, dated March 22, 2016 and May 1, 2017, ▇▇▇

) Be On The Look-Out (BOLO) information notices for suspicious behavior
) The "See something, Say Something" Program flyers to report suspicious activity displayed on station platforms for bus/rail.
) Industry Safe database capture which identifies Incidents by Type, Collision, Security, Fare Media Recovery, Hazmat spill, incidents, etc., dated January 14-November 30, 2017.

VTA's Security Captain further provided ▇▇▇▇▇▇▇

VTA's Security Captain states ▇▇▇▇▇▇▇ Staff reviewed January 2015, 2016, and 2017 Transit Incident Patrol Reports. VTA's Security department issues the Transit Patrol Division Quarterly Reports which includes a comparison of previous quarter, program measures per quarter, staffing issues, budget, crime statistics report summary to date, traffic enforcement analysis, warrant/arrests, and service/response times.

The Year End Management Reports identifies Goals & Objectives, measurement data (comparisons), incident breakdowns, comments on

objectives, strategy plan, accomplishment, goal and objectives. Staff reviewed quarterly reports for 2017 (Q2), Year End Reports for 2015 (Q4), and 2016 (Q4). VTA Security statistics are provided monthly to VTA board/RSSRB, quarterly reports for board/in-house shared with General Manager, and the Annual Sheriff's Administration/Board.

Information is received from Light Rail Operations and is documented onto a Light Rail Occurrence Report. The information is centrally captured onto a Summary of Events (SOE) Log and the Security Incident Report (SIR) Log centrally captures all incidents.

The SOE generated daily identifies the following: Line, Date/Time, Yard, Coach (bus), Block, Location, Supervisor/Mechanic, Incident Details, Lift Road Calls/Lift Calls, and General Incidents. Staff reviewed SOE's dated August 1, 2015, November 7, 2015, February 6, 2016, May 7, 2016, February 4, 2017, and May 27, 2017.

3. VTA has a list of all light rail stations identified by name and address which is provided to local emergency response agencies. ██████████ ██ ██ ██ ██ New hires are provided with an orientation of the Security Program Configuration, staffing at agencies, crime statistics, security tools and awareness.

VTA Security New Contract, dated August 15, 2016, workflows chart identifies Protective Services is involved in contractual reviews.

██ ██ ██

4. VTA performed a full TVA ████████████████████ ██ ██ ██ ████████████████████████████████████

███ to promote
safety and security objectives within VTA facilities.

5. See Item 4, above.

6. VTA's Protective Services participates in the RSSRB Monthly Meetings, and the Operations and Safety & Security Sync-Up Meeting, created in April 2017. Both meetings discuss security issues.

7. VTA provided the following examples, documents of regular testing and inspections of its facilities and assets:

   a. See Items 1-4, above.
   b. See Items 1-4.
   c. ███
   ███████ Staff reviewed the North Bus Yard, Chaboya Yard, Cerone, River Oaks, and Guadalupe Light Rail Yard reports, dated August and September 2017. Staff reviewed CCTV Bi-Weekly Camera Checks, dated April 24, 2017, May 15, 2017, May 29, 2017, June 26, 2017, July 17, 2017, August 28, 2017, September 11, 2017, October 2, 2017, and November 10, 2017, verifying these tasks were performed and documented.
   d. VTA has the All-Hazards Awareness and Preparedness for Transit Employees, dated May 2013, and is shared with Security.
   e. See Checklist 1.

Comments:

    None.

Findings:

    None.

Recommendations:

    None.

2017 CPUC SYSTEM SECURITY REVIEW CHECKLIST FOR SANTA CLARA VALLEY TRANSPORTATION AUTHORITY

Checklist No.	3	Subject	ID Concepts for Passenger and Employee Security
Date of Review	November 16, 2017	Department	Security (Protective Services)
Reviewers/ Inspectors	██████████ ██████████	Person(s) Contacted	████████████████████

REFERENCE CRITERIA

1. General Order 164-D.
2. VTA Security and Emergency Preparedness Plan (SEPP) Dated February 2016.

ELEMENT/CHARACTERISTICS AND METHOD OF VERIFICATION

ID Concepts for Passenger and Employee Security

Interview the VTA representatives responsible for the Security & Communication involvement. Review VTA's security incident and reporting program for the past three years to determine if:

1. VTA's employees, contractors, and passengers role as the first line of defense against criminal or terrorist activities as witnesses to criminal or suspicious behavior within VTA's operations;

2. VTA's frequency (e.g. Meetings) for increasing/strengthening community involvement and participation in the safety and security of the transit system by attending and participating in meetings with local emergency responders;

3. VTA's System Safety and Security Team meets twice month and performed the activities identified in Section 4.3.5;

4. VTA's System Safety and Security Team hosted a monthly Security Projects Status Meeting and performed the activities identified in Section 4.3.5.

RESULTS/COMMENTS

Activities:

Staff interviewed VTA Security and Allied Universal Staff responsible for ID Concepts for Passenger and Employee Security and determined the following:

1. VTA uses several programs to deter terrorism and crime. ███ The reports are sent to Protective Services for review then disseminated to appropriate agency for action. Staff reviewed the following Protective Services Notice dated: April 30,2015, December 18, 2015, January 28, 2016, February 3, 2016, March 22, 2016, and April 7, 2016. Staff reviewed the following CARE Reports dated: January 28, 2015, June 19,

2015, August 20, 2015, November 28, 2016, November 30, 2016, November 28, 2016, October 22, 2017, October 24, 2017, and September 22, 2017. E-Alerts – Generated by mobile application a user can download from VTA's public website. E-Alerts are sent to CCTV department and forwarded to the appropriate department to respond. CCTV Bi-Weekly Camera Check and BOLO, see Checklist 1.

2. VTA hosted and participated in the following County and community meetings to increase/strengthen community participation and involvement in safety and security:

　∫ Downtown Safety Coordination Meeting, dated September 27, 2017

　∫ Santa Clara County Command Operations Group, dated June 17, 2015

　∫ Santa Clara County Command Operations Group, dated June 21, 2017

　∫ Santa Clara Valley Transportation Authority Board of Director's Meeting, dated March 2, 2017 - Items presented Quarterly Safety and Security Report 4th Quarter: October to December 2016.

　∫ Safety, Security, and Transit Planning and Operations – Agenda and meeting minutes reviewed - February 16, 2017. Items discussed included VTA's Safety and Security Programs. Transit Patrol discussed VTA's Security Program.

　∫ VTA FLSC monthly agendas. Standing Agenda Item 4 is dedicated to Local First Responders issues, concerns, and items are addressed.

　∫ Committee for Transportation Mobility & Accessibility, dated September 14, 2017. Transit Security Efforts at LR Station is a dedicated topic of discussion addressed by Protective Services each month.

　∫ Rail System Safety Review Board (RSSB), see response from Checklist 1, Q3.

3. See Checklist 1, Items 2 and 3. In addition, Protective Services meets with Safety once a month via Operations and Safety & Security Sync-up.

Items discussed include the following: Safety Moment, Opening Comments, Update from Protective Services Management, Update from Safety and Compliance, Open Items.

4. Per SEPP, Section 4.3.5, in addition to hosting monthly security project status meetings, VTA's Protective Services applied for the following:

   a. FEMA Grant █████████████████████████████████ ████████████████████████████████████ ████████████████

   █ FEMA ████████████████████████████████ ██ ██ ██ ████████████████████████████████ █████████████████████████

Comments:

    None.

Findings:

    None.

Recommendations:

    None.

2017 CPUC SYSTEM SECURITY REVIEW CHECKLIST FOR SANTA CLARA VALLEY TRANSPORTATION AUTHORITY

Checklist No.	4	Subject	Process for Internal Security Reviews
Date of Review	November 16, 2017	Department	Security
Reviewers/ Inspectors	██████ ██████	Person(s) Contacted	████████████

REFERENCE CRITERIA

1. General Order 164-D
2. VTA Security Emergency Preparedness Plan (SEPP), Dated February 2016

ELEMENT/CHARACTERISTICS AND METHOD OF VERIFICATION

Process for Internal Security Reviews

Interview the VTA representatives responsible for the Internal Security Audit (ISA) Process. Review the appropriate procedure and audit reports for the past three years to determine if:

1. VTA annually performed an internal security audit;
2. VTA addressed all of the required security program elements within the past audit cycle, typically 3 years;
3. VTA does not recycle its security checklist from prior cycle;

   ███ VTA's security checklists are derived ███████████████████████
   ███████████████████ ██████

   ██
   ██
   ██████████████████████

6. VTA made the internal security audit schedule and checklist available to CPUC Staff 30-days before scheduling;
7. VTA's Internal Security Audit (ISA) report includes the findings and corrective actions. All corrective actions are tracked unto completion;
8. VTA submits its ISA to the Regional Transit General Manager (GM) for approval. A copy of the ISA final report and the GM's letter of certification is submitted to CPUC Staff to show compliance with its SEPP and to show the status of subsequent Corrective Actions on or before February 15th of the following year;

RESULTS/COMMENTS

Activities:

Staff interviewed VTA Security and Allied Universal Staff responsible for Internal Security Reviews and determined the following:

1. VTA performed the Annual ISA for Years 2013-2016 per CPUC GO 164-D, Section 5.
2. VTA's addressed all required security elements reviews within a three-

year cycle.

3. VTA develops new security checklists for each Internal Security Audit three-year cycle and does not re-use the same security checklists from the prior audit for each element reviewed.

██
██
████████████████████████████████████

5. VTA's Rail System Safety Review Board ████████████████
████████████████████████

6. VTA formally notified PUC Staff 30-days in advance of ISA by letters for Sections 5 and 12, Sections 6 and 8, Section 4, Sections 9, 10 and 11, Section 7, Section 5 and 12, and Section 6, dated April 2, 2014, September 4, 2014, April 6, 2015, September 8, 2016, April 19, 2016, April 12, 2017, and September 22, 2017, respectively.

7. Allied Universal is responsible for tracking the status of CAP's to closure. The Annual Reports provide the status of open/closed recommendations and responsible parties.

8. VTA's provided copies of Certification Letters dated February 6, 2015 for Year 2014 ISA Audit Report, February 19, 2016 for Year 2015 ISA Audit Report, dated January 31, 2017 for Year 2016 and schedule included in the Annual Report. No exceptions were noted.

Comments:

    None.

Findings:

    None.

Recommendations:

    None.

2017 CPUC SYSTEM SECURITY REVIEW CHECKLIST FOR SANTA CLARA VALLEY TRANSPORTATION AUTHORITY

Checklist No.	5	Subject	Process for Generating its Security Plan
Date of Review	November 16, 2017	Department	Security
Reviewers/ Inspectors	███████ ███████	Person(s) Contacted	████████████████

REFERENCE CRITERIA

1. General Order 164-D
2. VTA Security Emergency Preparedness Plan (SEPP), Dated February 2016

ELEMENT/CHARACTERISTICS AND METHOD OF VERIFICATION

Process for Generating its Security Plan

Interview the VTA representative(s) responsible for the Security Emergency Preparedness Plan (SEPP) Administration. Review the

SEPP implementation, and update process of the SEPP for the past three years to determine if:

1. VTA communicates that security is a top priority for all employees;
2. VTA management is actively soliciting the security concerns of all employees;
3. VTA management assists with the development of implantation plans and strategies for new security initiatives;
4. VTA management reviews security initiatives and activities before implementation to determine their impacts on the areas under the manager's control;
5. VTA has an existing process to communicate and disseminate new and revised procedures of the SEPP to VTA personnel.

RESULTS/COMMENTS

Activities:

Staff interviewed VTA Security and Allied Universal Staff responsible for the Process of Generating the Security Plan and determined the following:

1. See Checklist 1, Item 2, Checklist 2, Items 1 and 3.
   See Checklist 1, Items 2 and 4 . VTA's Ethics Hotline allows employees to report violation of policies and is monitored by ███████

   ████████████████████████████
   ████████████████████████████

   Additional methods for reporting include the VTA Operator Comment Form and Courtesy Cards, VTA Phone Threat Cards, and the Great Ideas Log ████████████████

   ████████████████████████████
   ████████████████████████████

3. All potential VTA Contractors must go through ████████

   ████████████████████████████
   ████████████████████████████

Examples of VTA Management's assistance with the development of implantation plans and strategies ███████████████████████ ███████

█████████████████████████████████████
██
████████████████████████
███
████████████████████████████
███
███
███████████████████
██
███
██
████████████████████████████████████
██████████████████████

4. See response to Item 3 above.
5. VTA's Protective Services' current process ████████████████
██
██
████████████████████████████████

Comments:

    None.

Findings:

    None.

Recommendations:

    None.