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**2018**

**TRIENNIAL ON-SITE SECURITY REVIEW OF  
SAN DIEGO METROPOLITAN TRANSIT SYSTEM**

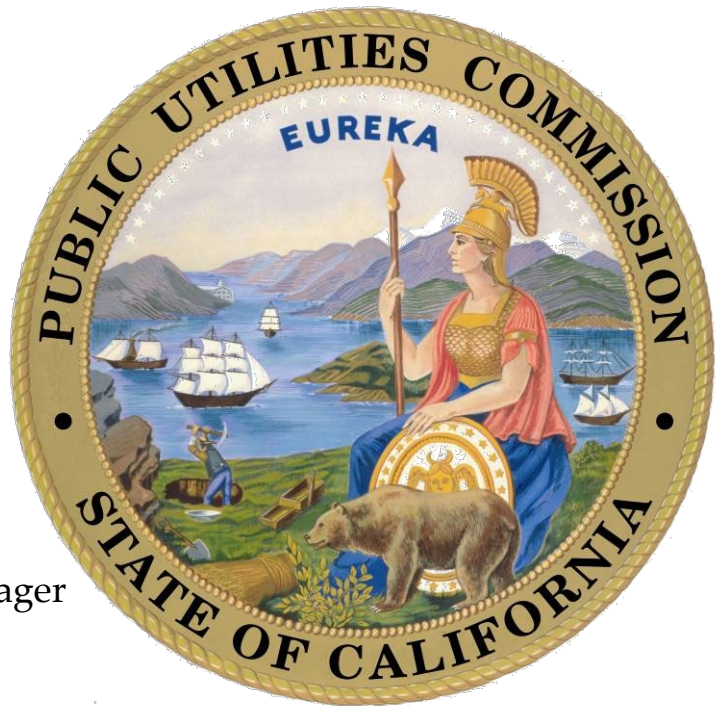
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Final Report

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2018 TRIENNIAL ON-SITE SECURITY REVIEW  
SAN DIEGO METROPOLITAN TRANSIT SYSTEM

ACKNOWLEDGEMENT

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

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## 1. EXECUTIVE SUMMARY

The California Public Utilities Commission's Safety and Enforcement Division (Effective July 1, 2019, now the Rail Safety Division - RSD), Rail Transit Safety Branch (RTSB) staff (Staff), conducted an on-site system security program review of the San Diego Metropolitan Transit System (MTS) on June 7, 2018. The review focused on verifying the MTS' implementation of the System Security Plan (SSP) for the San Diego Trolley, Inc. (SDTI) rail transit system. This report details staff's investigatory actions, findings, and recommendations.

On Monday, June 4, 2018, MTS personnel and Staff met for an opening conference, which preceded the on-site review activities. On June 7, 2018, Staff conducted the 2018 MTS triennial on-site security review. A post-review conference meeting occurred on July 31, 2018, with Staff providing MTS personnel with a summary of its review. Staff identified no findings of non-compliance during the triennial on-site security review and makes no recommendations for corrective actions.

Section 2 (Introduction) of this report provides a summary of the authority under which the California Public Utilities Commission (CPUC or Commission) performs the triennial reviews and presents a brief chronology of the review. Section 3 (Background) includes a description of the SDTI 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 MTS. The SDTI on-site triennial safety review report is contained in a separate Report and is brought before the Commission for approval in a separate Resolution.<sup>1</sup>

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<sup>1</sup> Staff's safety review and report, "2018 Triennial Safety Review of San Diego Trolley, Inc." is being brought before the Commission concurrently in Resolution ST-224.

## 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* and the Federal Transit Administration's (FTA) Rule, Title 49 Code of Federal Regulations (CFR) Part 659, *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 security program at a minimum of once every three years. The triennial security review verifies compliance and evaluates the effectiveness of each rail transit agency's System Security Plan (SSP)—in this case the MTS 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 MTS on-site security review in June 2015.

On May 4, 2018, Staff advised the San Diego Metropolitan Transit System Chief Executive Officer that the Commission's safety and security reviews had been scheduled for May 17-June 8, 2018. The letter included five checklists that served as the basis for the security review.

On June 5, 2018, Staff conducted an opening conference with the MTS Chief Executive Officer, Chief of Police of Transit Security, Executive Management, Superintendents, Supervisors, and Transit Security personnel. On June 7, 2018, Staff conducted the triennial on-site security inspection and records review. Staff developed five (5) checklists for the inspection of the System Security Plan that Staff derived from the CPUC's GO 164, FTA's 49 CFR 659, Transportation Security Administration's (TSA) Baseline Security Review, and MTS' SSP. At the conclusion of each review activity, Staff provided a verbal summary of the preliminary findings to MTS personnel and discussed initial recommendations for corrective actions, if any.

On July 31, 2018, Staff conducted a post-review exit meeting with MTS' Chief Executive Officer, Chief Operations Officer, Chief of Police, and department Superintendents. Staff provided attendees a summary of the review and findings from the five checklists. Staff concluded MTS demonstrates compliance with its SSP and there were no findings based on the five triennial security checklists.

### 3. BACKGROUND

The Metropolitan Transit Development Board (MTDB) was created in 1975 by passage of California Senate Bill 101 and was empowered to design, engineer, and build fixed guideway facilities within San Diego County, California. San Diego Trolley, Inc. (MTS-Rail) was created by the MTDB in August 1980 as a wholly owned subsidiary responsible for operation and maintenance of the Light Rail Transit (LRT) system. The San Diego Regional Transportation Consolidation Act (Senate Bill 1703 effective January 1, 2003) directed consolidation of the San Diego Association of Governments (SANDAG) with the capital projects functions of the transit boards MTDB and North San Diego County Transit Development Board (NCTD). The planning, programming, project development, and construction functions of MTDB and NCTD were shifted to SANDAG to create a consolidated regional transportation planning and development agency. In 2005, MTDB changed its name to the Metropolitan Transit System (MTS or MTS) to reflect the new relationship with SANDAG. The area of jurisdiction is about 570 square miles serving a population of 3 million, approximately 75% of southwestern San Diego County.

#### Scope of Security Review

Commission Staff conducted its security review in accordance both with guidance and training from the Federal Transit Administration (FTA) and with Title 49 Code of Federal Regulations, Part 659. Section 659.23 of the Code of Federal Regulations 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 MTS security program. Staff evaluated MTS security plans and procedures to determine whether they meet the requirements of section 659.23. The triennial security review evaluates whether MTS 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 MTS adopted are implemented in accordance with statute and the MTS SSP. Staff does not evaluate MTS' 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 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 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 identify security concerns at all times 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.

## SDTI Rail System

The SDTI LRT system operates over 53.5 miles on three routes, mostly double-tracked, with 53 stations. MTS fiscal year ridership averaged 239,633,896 in 2015, 231,071,338 in 2016, and 225,827,664 in 2017. SDTI's rail lines are classified as "light rail" on semi-exclusive right-of-way. There is a shared corridor with BNSF, Amtrak, and Coaster trains beginning at Park Blvd/Harbor Drive on the Bayside Corridor going through the Old Town Corridor parallel to Pacific Highway and ending approximately a quarter mile north of the Taylor Street grade crossing. In addition to the shared corridor, portions of SDTI track on the Blue and Orange Lines are jointly used by light rail transit and freight operations under scripted temporal separation with limited night-time joint operations. The San Diego and Imperial Valley Railroad (SDIV), a subsidiary short line railroad owned by Genesee & Wyoming Corporation, shares track with SDTI on the Blue line from the Imperial Transfer Station to the International Border. SDTI and SDIV share track on the Orange Line from Commercial Street at the Imperial Junction to Bradley Avenue in El Cajon, California. Freight operations by SDIV operate during the early morning hours with a fringe period of overlap with SDTI light rail transit operations under a Federal Railroad Administration (FRA) waiver. FRA approved SDTI standard operating procedures ensure during this overlap mode of operation the light rail vehicles remain spatially and temporally<sup>2</sup> separated.

SDTI operates four lines described as:

- **Blue Line** - Revenue service began on July 26, 1981. The Blue Line currently extends 15.4 miles from the America Plaza Station to the San Ysidro station at the U.S-Mexico international border. Trains operate on city streets for 1.4 miles (C Street & India to 12<sup>th</sup> & Imperial) of the total 15.4 miles with the remaining 14 miles from 12<sup>th</sup> & Imperial to the San Ysidro station operating in semi-exclusive right-of-way<sup>3</sup>. The Blue Line operates through four jurisdictions: the cities of San Diego, National City, Chula Vista, and an unincorporated area of San Diego County.

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<sup>2</sup> Temporal separation exists when no simultaneous operation of light rail transit and freight trains on the same tracks occurs.

<sup>3</sup> CPUC General Order 143-B, § 9.04 Alignment Classification: Semi-exclusive is 1) fully exclusive right-of-way with at-grade crossings, protected between crossings by a fence or substantial barrier, if appropriate to the location. 2) Within street right-of-way but protected by six-inch high curbs and safety fences between crossings. The safety fences should be located outside the tracks. 3) Within street right-of-way but protected by six-inch high curbs between crossings. A safety fence may be located between tracks. 4) Within street right-of-way, but protected by mountable curbs, stripping, or lane designation.



- **Orange Line** - Revenue service on the first phase, from Imperial Transfer to the Euclid Avenue station, began on March 23, 1986. The line was extended in 1989 to El Cajon, and to Santee in 1995. The Orange Line currently extends 16.9 miles from the Santa Fe Depot station (via the downtown San Diego C Street corridor) to the El Cajon Transit Center station. Of the 16.9 miles, 1.7 miles of track are operated on city streets (C Street & India to 32<sup>nd</sup> & Commercial). After the 32<sup>nd</sup> & Commercial Station, the line continues east for an additional 13.8 miles on semi-exclusive right-of-way to the El Cajon Transit Center station. The Orange Line operates through four jurisdictions including the City of San Diego, Lemon Grove, La Mesa and El Cajon.
- **Green Line** - Revenue service began on July 10, 2005. The Green Line begins at the Imperial Transfer Station and extends 23.8 miles through Mission Valley, under San Diego State University (SDSU) via a subway and continues east on semi-exclusive right-of-way to Cuyamaca Street in Santee. The last 0.6 miles of the line are operated on city streets before terminating at the Santee Town Center Station.
- **Silver Line** - One Presidential Conference Car (PCC) Vintage Trolley Streetcar began revenue service on August 2011 and the second PCC began in March 2015. The PCC operates on an existing 2.7-mile downtown loop from the 12<sup>th</sup> & Imperial Transit Center station clockwise, adjacent to Harbor Drive, on C Street, and Park Blvd and completes its loop at the 12<sup>th</sup> & Imperial Transit Center station on the “third track.” The PCC operates Friday 5:30am-12:30pm, Saturday on 1:30pm-10:30pm, and Sunday 9:30am-6:30pm and major holidays on 30-minute headway.

### **System Expansions and Capital Projects**

#### **Mid-Coast Corridor Transit Project**

The Mid-Coast Trolley project will extend Trolley service from Santa Fe Depot in Downtown San Diego to the University City community, serving major activity centers such as Old Town, the University of California San Diego (UCSD), and Westfield UTC. (See Figure 1.) Construction began in 2016, with service to begin approximately four to five years later.



Figure 1 – Mid-coast Project Alignment

The Mid-Coast extension begins just north of the Old Town Transit Center and travels in existing railroad right-of-way and alongside Interstate 5 to Gilman Drive. It crosses to the west side of I-5 just south of Nobel Drive and continues to the UCSD campus, crosses back to the east side of I-5 near Voigt Drive to serve the

UCSD east campus and medical centers, transitions into the median of Genesee Avenue, and continues down Genesee Avenue to the Westfield UTC Transit Center.

The project will connect corridor residents with other Trolley lines serving Mission Valley, East County, and South County. As an extension of the existing Blue Line, it will offer a one-seat (no transfer) ride from the international border and communities south of Downtown San Diego all the way to University City. This new service will enhance direct public access to other regional activity centers and improve travel options to employment, education, medical, and retail centers for corridor residents, commuters, and visitors.

In Fall 2014, the Mid-Coast project received its final environmental clearance from the SANDAG Board of Directors and the Federal Transit Administration (FTA). In September 2016, the FTA signed a Full Funding Grant Agreement with SANDAG to provide the 50 percent federal match needed to begin construction in late Fall 2016. The other half of the funding is provided by TransNet, the San Diego region's voter approved half-cent sales tax for transportation improvements. Pre-construction activities consisting of relocating underground utilities for the project alignment, began in early 2016. Primary construction activities are currently in-process and revenue service anticipated to begin in Summer 2021.

### **SD9 Light Rail Vehicle Procurement**

SDTI is procuring 45 new light rail vehicles (LRVs) from Siemens Transportation Group. The 45 new LRVs are being procured in advance of the Mid-Coast Light Rail Extension activation, scheduled for revenue service Fall 2021. The new vehicles will operate on the existing SDTI system and their future Mid-Coast Rail Extension. The procurement project began January 2018 with an expected scheduled completion and acceptance of all 45 LRVs by June 2021. The 45 new SD9 LRVs will be manufactured by Siemens Transportation Systems, Inc. in Sacramento, California. The SD9 models are similar to the eleven S70 Siemens LRV models currently in revenue service on the SDTI system since July 2005 and the 65 SD8 models in revenue service since September 28, 2011. All 45 new LRVs will be equipped with two forward facing cameras in each of the train operator's cabs which record train operator actions (in accordance with General Order 172) and events in front of the train such as pedestrian traffic or motor vehicle movement. The other interior cameras in the seating areas provide security to enhance passenger safety on-board the trains. The first LRV is scheduled for revenue service by March 2019.

## **MTS Security Background**

MTS conducts its security program through the efforts of 53 Code Compliance personnel, 11 Code Compliance Supervisors, who focus on fare evasion and quality-of-life violations. A total of 144 contract security officers also perform security-related services.

An average total of 85 Code Compliance Inspectors and contract security officers are deployed daily on five shifts covering all hours of operation. At the commencement of each shift, supervisors conduct briefings for inspectors and officers to: (1) pass on important information, (2) emphasize compliance with established policies and procedures, and (3) conduct necessary training. Specialized teams are formed on an as-needed basis to address specific security problems on the system. One is the Special Enforcement Unit (SEU) comprised of contract security officers and Code Compliance Inspectors. The unit performs fare evasion sweeps at different locations and times throughout the system to deter fare evasion and cite violators. A plain-clothes team is formed from time to time to address such problems as vandalism or gang activity. The team is made up of contract security officers and Code Compliance Inspectors who work plain-clothes to deter criminal activity and to apprehend violators.

Joint efforts are also organized with local law enforcement agencies. These joint operations have varying goals: (1) apprehending persons with warrants, (2) apprehending parole violators, (3) truancy sweeps, (4) targeting drug offenders, and (5) addressing gang activity.

Security breaches are observed by enforcement personnel and handled directly, or contract security officers are dispatched by OCC when a breach or incident occurs. If the problem is beyond the capability of responding contract security officers, OCC notifies the local law enforcement agency to respond to assist or accept custody of arrestees.

Memoranda of Understanding are in place with local law enforcement agencies governing areas of enforcement responsibilities at the Old Town Transit Center, Santee Town Center station, and San Diego State University. These Memoranda spell out specific roles for each agency and who has ultimate responsibility under a variety of circumstances. These Memoranda will serve as models for future agreements at other locations of shared jurisdiction.

Transit System Security utilized a variety of projects with the San Diego Police Department (SDPD) and other local law enforcement agencies to target offenders, apprehend violators, address drug and gang activity, and enhance officer training.

All crime and incident reports, after approval by the appropriate supervisor, are uploaded to the eForce database for processing, statistical analysis, and storage in the centralized records section. The eForce database system receives reports inputted from three sources: (1) Code Compliance Inspectors, (2) contract security officers, and (3) local law enforcement agencies. The reports are transmitted to supervisors within the eForce system for review and validation.

MTS forwards copies of these reports to local law enforcement and prosecutorial agencies as required to investigate and prosecute offenses occurring on or near transit property. Records Managers' staff log all Notice to Appear citations issued by the Code Compliance Inspectors into the eForce database. Monthly reports are generated from this crime database.

In 2014, MTS brought eForce as a server-based means of documenting, tracking and recording radio calls for service, reports of criminal misconduct, issuance of citations, written warnings and other incidents and activities.

#### **Status of the 2015 MTS Triennial Security Review**

Staff performed the previous triennial on-site security review in 2015. No Findings or Recommendations were identified during that review. CPUC Resolution ST-187, adopted on December 15, 2016, granted Commission approval of Staff's final 2015 MTS On-Site Triennial Security Review report.

#### 4. SECURITY REVIEW PROCEDURE

Staff conducted the 2018 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., MTS SSP, security-related MTS 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 MTS operations. A list of the 5 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, MTS, and other documents that establish the security program requirements. The methods used to perform the review included:

- Discussions and interviews with MTS Transit Enforcement;
- 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 MTS personnel. The post-review summary is beneficial to clarify findings or best-practices and provides MTS an opportunity to promptly address any necessary security improvements.

## 5. FINDINGS AND RECOMMENDATIONS

The triennial on-site security review shows the MTS rail system has a comprehensive SSP and is complying with their plan. The review results are derived from documents reviewed, and issues discussed with management and rank and file employees. Overall, the review result confirms MTS complies with its SSP. The review identified no findings or recommendations from the 5 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.

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## APPENDIX A

### ABBREVIATION and ACRONYM LIST

<b>Abbreviation / Acronym</b>	<b>Description</b>
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
FTA	Federal Transit Administration
GO	General Order
ISA	Internal Security Audit
MTS	Metropolitan Transportation System
NIMS	National Incident Management System
OCC	Operations Control Center
RTSB	Rail Transit Safety Branch
RSD	Rail Safety Division
SSP	Security Program Plan
Staff	Rail Transit Safety Branch personnel
TTX	Table Top Exercise
TVA	Threat and Vulnerability Assessment

## APPENDIX B

### 2018 MTS TRIENNIAL SECURITY REVIEW CHECKLIST INDEX

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

**APPENDIX C**

**2018 MTS TRIENNIAL SECURITY REVIEW  
RECOMMENDATIONS LIST**

No.	Recommendation	Checklist No.
	None.	

**APPENDIX D**

**2018 MTS TRIENNIAL SECURITY REVIEW CHECKLISTS**

## 2018 CPUC System Security Review Checklist for METROPOLITAN TRANSIT SYSTEM (MTS)

<b>Checklist No.</b>	<b>1</b>	<b>Element</b>	<b>Identify Policies, Goals, and Objectives</b>
<b>Date of Audit</b>	June 07, 2018	<b>Department(s)</b>	MTS Security
<b>Auditors/ Inspectors</b>	Rupa Shitole Michael Warren	<b>Persons Contacted</b>	Manuel Guaderrama, MTS Chief of Police Tim Curran, Deputy Director of Transit Security Brian McKeever, Field Operations Manager

### REFERENCE CRITERIA

1. General Order 164-D
2. MTS System Security Plan (SSP) dated January 2018

### ELEMENT/CHARACTERISTICS AND METHOD OF VERIFICATION

#### **Identify Policies, Goals, and Objectives**

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

1. The MTS SSP is certified by the Chief Executive Officer and the Chief of Police.
2. MTS SSP goal establishes a security program to maximize system security by eliminating or effectively controlling threats and vulnerabilities through an ongoing threat and vulnerability identification, assessment, and resolution process described in SSP Section 1.2.
3. MTS contract security officers and Code Compliance Inspectors work together to conduct transit enforcement operations and perform functions as described in SSP Section 1.4.
4. MTS reviews all crime and incident reports and how are they analyzed, distributed and approved?

## FINDINGS AND RECOMMENDATIONS

### Activities:

Staff interviewed MTS representatives responsible for Security and determined the following:

1. MTS SSP memo dated January 2018 was signed off by the Chief of Police. MTS letter to CPUC dated January 18, 2018 was signed off by the Chief Executive Officer and Chief of Police. The CPUC MTS SCP approval letter dated January 23, 2018 was signed by CPUC Program and Project Supervisor.
2. MTS performs ongoing threats and vulnerabilities assessments throughout the system, drafts an annual report, and shares it internally. MTS started this new program for the last two years. MTS assesses major transit agency stations and a San Diego State University (SDSU) transit draft report was shared with Staff. System cameras are monitored every night for functionality purposes and if they are defective, MTS audit team submits an audit report and camera is fixed by either IT and/or contractor within 72 hours. San Diego Law Enforcement Communication Center (LECC) has a data center where all other law enforcement agencies share information data access such as transit agency contact persons, MTS TVAs, etc. in case of an emergency. K9 Unit performs periodic inspections for larger transit centers. MTS has instituted a See Something/Say Something program called MTS Ride Assured. Train posters and pamphlets allows patrons to contact dispatch, who notifies security management, who then determines if they feel it is a threat to the system and Freedom Center needs to be notified. MTS has three (3) K9 units and the fourth K9 unit is forthcoming. The K9 units have trainers and are used on transit inspections. MTS K9 unit is a TSA funded program and MTS Security trains their supervisors (one day seminar) on current issues and trends on the system such as homeless veteran issues and substance abuse issues for appropriate response. List of resources is also provided. Refer to checklist 2 for more details.
3. Code Compliance Inspectors and MTS contracted security officers jointly team together to perform inspections on the transit property. Code Compliance Division Inspectors are not armed and receive PC832 training and others as needed. Trained security personal is MTS contracted, and carry firearms, pepper spray, etc. MTS contracted security officers and Code Compliance Inspectors work together to conduct transit enforcement operations of fare enforcement, patrol transit property, prepare crime/incident reports, arrest offenders, transport arrestees, conduct

criminal and accident investigation, conduct in service training, explosive detection- K9 program, etc. Staff noted that contractor security personnel should be receiving their basic roadway worker protection training to remain safe when necessary to access the track zone.

4. MTS uses e-Force database to track all incident reports. Any incident, Incident Summary Report (ISR), is written up by the watch commander, sent to Security Management, looked over, and addressed as needed. ISRs can encompass minor things such as slips/trips up to major confrontations. ISRs are assessed for whether additional agency notifications are needed. MTS security personal conduct quarterly trend analysis. Also, MTS has access to San Diego Police Department database and can share the information if it is on transit property related case.
  - a. Staff reviewed the following ISRs:
    - i. Incident Number 18007108
    - ii. Incident Number 18001909
    - iii. Incident Number 18007348

Findings of Non-compliance:

None

Comments:

Staff discussed with MTS Security providing ongoing basic RWP training to MTS Contractor Security.

Recommendations:

None

## 2018 CPUC System Security Review Checklist for METROPOLITAN TRANSIT SYSTEM (MTS)

<b>Checklist No.</b>	<b>2</b>	<b>Element</b>	<b>Process for Management of Threats and Vulnerabilities</b>
<b>Date of Audit</b>	June 07, 2018	<b>Department(s)</b>	MTS Security
<b>Auditors/ Inspectors</b>	Rupa Shitole Michael Warren	<b>Persons Contacted</b>	Manuel Guaderrama, MTS Chief of Police Tim Curran, Deputy Director of Transit Security Brian McKeever, Field Operations Manager

### REFERENCE CRITERIA

1. General Order 164-D
2. MTS System Security Plan (SSP) dated January 2018

### ELEMENT/CHARACTERISTICS AND METHOD OF VERIFICATION

#### **Process for Management of Threats and Vulnerabilities**

Interview the MTS representatives responsible for the protection against threats and vulnerabilities. Review the SSP, Threat and Vulnerability Assessments (TVAs), and related documents for the past three years to determine if:

1. MTS identifies threats from internal and external information resources.
2. Observations and incidents are reported, evaluated and assessed based on their impact and the criticality of the assets involved to the transit system operations.
3. MTS' in-process capital projects (e.g. MidCoast, SD9) received a TVA and received a Risk Assessment score.
4. Transportation Security Administration (TSA) performed a recent TVA and what were the results?
5. MTS Security and Safety departments have conducted annual tests and drills to evaluate and identify threats and vulnerabilities.



6. MTS has addressed threats and vulnerabilities identified in TVAs over the past three years.
7. MTS' Chief of Police/Director has approved the TVAs.

## **FINDINGS AND RECOMMENDATIONS**

### Activities:

Staff interviewed MTS representatives responsible for Threat and Vulnerability Assessments and determined the following:

1. MTS is a part of the Joint Agency Task Force (JATF) approved through grants. The JATF is a multi-agency task force that includes MTS, San Diego Police Department (SDPD), SDSO (SD Sheriff), La Mesa PD, El Cajon PD, and Chula Vista PD that patrols overall MTS System. The MTS Security partners with various local, state and federal law enforcement task forces ongoing. Also, Department of Homeland Security (DHS) are consistently feeding agencies with ongoing crime and threat details. Transit Security Administration (TSA) does review the MTS TVAs as needed and MTS does ongoing assessment of their property and assets as well. Terrorist Liaison Officers are in contact with MTS security regarding information that prepares MTS to be alert. Transit employees are also involved in reporting any kind of theft on the right of way such as copper cables thefts, vehicle vandalism, etc. MTS shared with Staff an example of the November 2017 copper theft that occurred and the reporting process. MTS citizen complaints are also reviewed and analyzed on a day to day basis. MTS example shared with Staff was the Santa Fe Depot Station Ticket Vending Machine was not working and MTS responded as required. MTS Daily inspections are reviewed and analyzed as required. Incident Summary Report (ISR) was shared with Staff dealing with cases 18001903, 18007167, 18001954.
2. ISRs are received, evaluated, and assessed daily. Refer to 2018 MTS Triennial Security Review Report Checklist no. 1
3. MTS has TVA's in place for their current new projects like Mid Coast and SD9. Prior to formal Commission approval in 2017 of the Mid-Coast Safety Certification Plan, Staff was required to verify a Threat and Vulnerability Assessment was performed as required by General Order 164-D. Staff met with MTS Security at their office in March 2017, verified a Mid-Coast corridor Transit Project: Threat and Vulnerability Assessment dated November 23, 2015, was performed, and a formal Commission Resolution ST-186 dated 1/23/2017 approved the Mid-Coast SCP.

4. TSA conducted assessments from 2015-2017 on all their Light Rail Stations (53 stations). The TSA checklists were reviewed randomly for 8<sup>th</sup> Street Station and Middletown Station. The TSA provided to MTS items for consideration to review and work on. MTS received the TVA documents from TSA mid-2017. As funding prevails, MTS works on these considerations.
5. MTS Security has drills/run-throughs with law enforcement for events occurring around the system. (Refer to 2018 MTS Triennial Safety Review Report Checklist no. 11.)
6. MTS Internal TVA is in draft format and will be completed by July 2018. San Diego State University TVA was shared and reviewed by Staff. MTS works on threats and vulnerabilities identified in the TVAs as required.
7. MTS Chief of Police approves MTS TVAs ongoing.

Findings of Non-compliance:

None

Comments:

None

Recommendations:

None

## 2018 CPUC System Security Review Checklist for METROPOLITAN TRANSIT SYSTEM (MTS)

<b>Checklist No.</b>	<b>3</b>	<b>Element</b>	<b>ID Concepts for Passenger and Employee Security</b>
<b>Date of Audit</b>	June 07, 2018	<b>Department(s)</b>	MTS Security
<b>Auditors/ Inspectors</b>	Rupa Shitole Michael Warren	<b>Persons Contacted</b>	Manuel Guaderrama, MTS Chief of Police Tim Curran, Deputy Director of Transit Security Brian McKeever, Field Operations Manager

### REFERENCE CRITERIA

1. General Order 164-D
2. MTS System Security Plan (SSP) dated January 2018.

### ELEMENT/CHARACTERISTICS AND METHOD OF VERIFICATION

#### **ID Concepts for Passenger and Employee Security**

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

1. MTS' employees, contractors, and passenger's role as the first line of defense against criminal or terrorist activities as witnesses to criminal or suspicious behavior within MTS' operations is documented.
2. MTS Proactive Security Committee executes the items in SSP Section 3.4.
3. MTS Security Breach Review Committee executes the items in SSP Section 3.5 or 5.3.
4. MTS training identified in SSP Section 4.3 is conducted as described. Provide examples for basic, advanced, and Code Compliance Division training.
5. MTS analyses statistical data to respond to crime trends and potential threats.

6. MTS provides proactive security measures throughout the system using special enforcement teams as described in SSP Section 4.2.

## FINDINGS AND RECOMMENDATIONS

### Activities:

Staff interviewed the MTS representatives responsible for the Security & Communication involvement and noted the following:

1. MTS rolls out different transit programs for employees, contractors, and passengers to report against criminal and or terrorist activities on their system. The *See Something Say Something* is an ongoing program that helps MTS to keep their system safe and secure. Additional support of receiving and gathering information is through Customer Service Report (web or call) and front-line employees calling in Operations Control Center. MTS Human Resources Department conducts a presentation for all new employees regarding security awareness program(s). MTS Security Department trains their contracted security as needed on the MTS requirements. MTS Incident summary reports were reviewed dealing with cases 18001903, 18007167, 18001954.
2. San Diego Reginal Transit Security Working Group (SDRTSWG) quarterly meeting is attended by MTS security. Transit Security Administration (TSA) hosts the SDRTSWG meeting and report on Department of Homeland Security briefing, others topic is also discussed as needed. Federal Bureau Investigations (FBI) and other local jurisdictions also attend this meeting. There are no meeting minutes distributed/shared after the meeting. Roundtable is conducted at the end of each meeting to share other issues ongoing within their agencies and needs other agency to be aware. Ad-Hoc Security Committee meeting is also conducted with MTS Directors on a weekly basis, and the meeting is verbally conducted with no meeting minutes followed. MTS Incident summary logs are shared, and all high-level incidents are discussed at these weekly meetings with the MTS senior management. MTS Board meetings are conducted monthly and MTS Security attends these meetings. MTS Security conducts power point presentation for the Board twice annually and they present data for PART I (Onboard/Arrests) and PART II (Crimes: Trolley), and other information. Staff reviewed the Annual Security Report dated April 19, 2018. Joint Terrorism Task Force (JTTF) is also in contact with MTS along with other agencies.

3. Security Breach Review is conducted if a security breach occurs on MTS system, discussion amongst parties, and mitigation as required. Joint Agency Task Force (JATF) is a multi-agency task force that includes MTS, San Diego Police Department (SDPD), SDSO (SD Sheriff), La Mesa PD, El Cajon PD, and Chula Vista PD that patrols overall MTS System. MTS has a good working relationship with all cities that they work jointly to mitigate any issues. MTS Security Department Records Manager compiles all statistical data and presents it on a quarterly basis to MTS Security. The trends and potential threats are captured daily by reviewing the daily logs.
4. MTS Code Compliance Inspectors (CCI) are required to take the NIMs and SIMs training. NIMs and SIMs completed training their records are kept on files at MTS Security. PC832 training is also mandated and records are kept on files. Expert training contractors are brought in if expert training is required. MTS Security added 64 CCIs onboard since the last year. Thirty (30) additional security personal related to CCIs were hired by MTS contracted security. Staff reviewed following training records:
  - Employee 14293 CJIS Security (Advanced) dated 4/27/2018 Daily Training Evaluation was reviewed. This is a new employee and the PC 832 training record in not yet on files.
  - Contract Security Officer ID#4674 basic training (160 hours) completed 3/2/16
  - Contract Security Officer ID#5451 basic training (160 hours) completed 3/10/17
  - Field Training Officer ID #5189 FTO course (10 hours) completed 5/18/16
  - Contract Security Officer ID #4873 completed PC 832 June 2015 and Firearms February 2019
  - Contract Security Officer ID #4873 completed PC 832 June 2015 and Firearms February 2019
  - Contract Security Officer ID #5195 completed PC 832 March 2016 and Firearms June 2018
  - Code Compliance Inspector ID #13071 completed field training (240 hours) June 2016, PC832 April 2016
  - Code Compliance Inspector ID #14033 completed field training (240 hours) May 2017, PC832 August 2015
  - Code Compliance Inspector ID #13537 completed field training (240 hours) June 2015, PC832 June 2016
    - Advance courses completed: Investigations 101 April 2016, NIMS March 2016, Street Gangs April 2016

- Code Compliance Inspector ID #14031 completed field training (240 hours) May 2017, PC832 March 2018
5. MTS analyses statistical data to respond to potential system threats and general resource training for situation preparedness. Data is collected through several means, including Incident Summary Reports, committee meetings, public reports, and local law enforcement data. Trainings provided include: Tactical De-escalation Training, Alzheimer's Training, Mental Health Issues Training, Sheriff's De-escalation for Hostile Contacts Training
  6. MTS provided details related to the Special Enforcement Units (SEUs). MTS Fare inspections occur a minimum once/week or twice/week. The Compliance Code Inspectors and Contracted Security Officer are a part of the fare inspections and these are conducted in the AM hours or PM hours. Inspection activities and results are documented and shared monthly with the MTS Board of Directors. The local city Police Departments (PDs) are involved as needed if MTS finds an ongoing issue and MTS is in constant contact with local city PDs. JATF works on criminal issues with the help of San Diego Police and Sheriff's departments working together with MTS. Incidents like copper wire theft were shared and discussed briefly with Staff (Example: June 1, 2018 email). After Action Summary report for Special Enforcement Details for Morena/Linda Vista Trolley Station was reviewed. The Eagle Team is now discontinued since July 2017 and the Beats Team currently performs the same assignments as the Eagle Team. The team conducts daily inspections from 3 PM to 1 AM.

Findings of Non-compliance:

None

Comments:

None

Recommendations:

None

## 2018 CPUC System Security Review Checklist for METROPOLITAN TRANSIT SYSTEM (MTS)

<b>Checklist No.</b>	<b>4</b>	<b>Element</b>	<b>Process for Internal Security Reviews</b>
<b>Date of Audit</b>	June 07, 2018	<b>Department(s)</b>	MTS Security
<b>Auditors/ Inspectors</b>	Rupa Shitole Michael Warren	<b>Persons Contacted</b>	David Bagley, Manager of Safety Christopher Walger, Safety Tim Curran, Deputy Director of Transit Security Brian McKeever, Field Operations Manager

### REFERENCE CRITERIA

1. General Order 164-D
2. MTS System Security Plan (SSP) dated January 2018

### ELEMENT/CHARACTERISTICS AND METHOD OF VERIFICATION

#### **Process for Internal Security Reviews**

Interview the MTS 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. MTS Safety Department annually performed an ISA.
2. MTS addressed all five (5) required security program elements within the past three-year audit cycle.
3. MTS provided CPUC Staff with the ISA schedule and checklists 30-days before scheduling.
4. MTS' ISA annual report includes the findings and corrective actions.
5. MTS submits its ISA report to the Chief of Police/Director of Transit Enforcement for approval and certification. The ISA report copy is submitted to CPUC Staff to show compliance with its SSP and to show the status of MTS' subsequent Corrective Actions.

6. MTS prepares, implements, and tracks the corrective action plans and schedules to completion.

## **FINDINGS AND RECOMMENDATIONS**

### Activities:

Staff interviewed the MTS representatives responsible for the Internal Security Audit Process and noted the following:

1. MTS schedule for the three-year cycle (2015-2017) was reviewed and all required internal security review was completed annually.
2. MTS schedule for the three-year cycle (2015-2017) was reviewed and all required internal security elements were completed as per schedule. MTS Internal Safety and Security Audit Master Schedule for 2015-2017 showed S-1 & S-2 completed in 2017, S-3 completed in 2015 & S-4 & S-5 completed in 2016. MTS System Safety Manager conducts independent internal security review of the entire system every 3 years.
3. MTS System Safety Manager sends a memorandum with individual draft checklists emailed to CPUC Staff 30 days in advance as required. For the three-year cycle (2015-2017), all checklists and notifications were sent to the CPUC in a timely manner. Staff reviewed a few supporting memorandums dated July 17, 2017, October 18, 2016, and September 3, 2015. Calendar notices were provided to show compliance as well.
4. There were no findings or corrective actions related to the last 3 years ISA. Therefore, the ISA Annual Reports did not document any findings or corrective action plans.
5. Staff reviewed the following ISA Annual Reports submitted to CPUC during years 2016 through 2018:
  - MTS Annual Certification letter to CPUC dated February 13, 2016 included ISA Annual Report with findings and corrective action plan. CPUC approved the annual report by letter dated February 20, 2016.
  - MTS Annual Certification letter to CPUC dated January 25, 2017 included ISA Annual Report with findings and corrective action plan. CPUC approved the annual report by letter dated January 30, 2017.
  - MTS Annual Certification letter to CPUC dated January 25, 2018 included ISA Annual Report with findings and corrective action



plan. CPUC approved the annual report by letter dated February 12, 2018.

6. MTS System Safety Manager stated since there was no corrective action plan issued for the past 3 years, no tracking was required.

Findings of Non-compliance:

None

Comments:

Staff noted that the ISA Annual Reports could be improved by avoiding comments in the recommendation section. The MTS auditor must be clear if it is a recommendation or comment. A valid finding/deficiency leads to a recommendation and a corrective action plan. MTS should have a comments section on the future audits.

Recommendations:

None

## 2018 CPUC System Security Review Checklist for METROPOLITAN TRANSIT SYSTEM (MTS)

<b>Checklist No.</b>	<b>5</b>	<b>Element</b>	<b>Process for Generating its Security Plan</b>
<b>Date of Audit</b>	June 07, 2018	<b>Department(s)</b>	MTS Security
<b>Auditors/ Inspectors</b>	Rupa Shitole Michael Warren	<b>Persons Contacted</b>	Brian McKeever, Field Operations Manager Tim Curran, Deputy Director of Transit Security
<b>REFERENCE CRITERIA</b>			
<ol style="list-style-type: none"> <li>1. General Order 164-D</li> <li>2. MTS System Security Plan (SSP) dated January 2018</li> </ol>			
<b>ELEMENT/CHARACTERISTICS AND METHOD OF VERIFICATION</b>			
<b>Process for Generating its Security Plan</b>			
<p>Interview the MTS representative(s) responsible for SSP administration. Review the SSP implementation, and update process of the SSP for the past three years to determine if:</p> <ol style="list-style-type: none"> <li>1. MTS annually reviews the SSP, completes updates as necessary and major revision versions are tracked within the SSP;</li> <li>2. MTS' SSP is available to all MTS employees;</li> <li>3. MTS' SSP is in coordination/incorporated/references with other MTS plans;</li> <li>4. MTS has an existing process to track all Corrective Action Plan(s) incorporated, or to be incorporated, in the SSP from beginning to end.</li> </ol>			
<b>FINDINGS AND RECOMMENDATIONS</b>			
<p><u>Activities:</u></p> <p>Staff interviewed the MTS representatives responsible for the SSP administration process and noted the following:</p>			

1. MTS annually reviews its SSP and makes notes for any minor or major changes that needs to be made to the plan. The SSP revision table goes back to 2005. The Chief of Police, Deputy Director, and Field Operations Manager discuss all ongoing changes as needed. The SSP was reviewed annually as below:
  - MTS letter dated January 18, 2018 requesting CPUC review of SSP;
  - MTS letter dated January 13, 2017;
  - MTS letter dated January 6, 2016.
2. MTS have 19 controlled copies and all the 19 employees are given updated copies as required. The Chief Executive Officer, Chief Operating Officer, System Safety Manager and departments like Transportation, Maintenance of Wayside, Light Rail Vehicle, get a copy after every revision including the MTS Bus Division. Not all employees like MOW, LRV, etc. are handed copies however if they want to review the SSP their respective superiors are contacted. Transit System Security including Code Compliance Inspectors and Contracted Security Officers are provided ongoing training of any SSP changes.
3. MTS does coordinate and incorporate references into other MTS plans like operating procedures, etc. Staff reviewed memorandum documents related to SOP 106.23 dated 5/18/18 and General Order 2018-2 dated 1/4/18, from Chief of Police to All MTS Transit Enforcement Personnel. Bomb Threats and Suspicious Device Protocols related to SOP section 200.22 was updated to reflect the change.
4. MTS Safety Department tracks the Corrective Action Plans (CAPs) related to security internal audits. There was no CAP generated during the review process of generating their SSP.

Findings of Non-compliance:

None

Comments:

None

Recommendations:

None