



Public Transportation Agency Safety Plan

Adopted December 2020

Amended April 2025



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1. TRANSIT AGENCY INFORMATION

Transit Agency	Name		Address	
	City of Tracy		333 Civic Center Plaza, Tracy, CA 95376	
Accountable Executive	Name		Title	
	Arturo Sanchez		Assistant City Manager (for Public Works Director)	
Chief Safety Officer	Name		Title	
	Ed Lovell		Transit Manager	
Mode(s) of Service Covered by This Plan:			List All FTA Funding Types (e.g., 5307, 5337, 5339):	
Fixed Route Bus: Motorbus (MB)			5307, 5339	
Non-Fixed Route Bus: Demand Response (DR)			5307, 5339	
Mode(s) of Service Provided by the CITY OF TRACY (Directly operated or contracted service)				
Fixed Route: Motorbus (MB) – contracted service				
Non-Fixed Route: Demand Response (DR) – contracted service				
Does the agency provide transit services on behalf of another transit agency or entity?	Yes	No	Description of Arrangement(s)	
		X	N/A	
Transit Agency(ies) or Entity(ies) for Which Service Is Provided	Name		Address	
	N/A			
	N/A			
Transit Agency only serves a small urbanized area (and does not provide service in a large urbanized area)	Yes	No	Small Urbanized Area(s) Served	
	X		Tracy-Mountain House, CA (063840)	

Accountable Executive

City of Tracy’s Accountable Executive is the Public Works Director. The Public Works Director is the single, identifiable person who has ultimate responsibility for carrying out this Agency Safety Plan and the City of Tracy’s Transit Asset Management (TAM) Plan, and control or direction over the human and capital resources needed to develop and maintain both this Plan and the TAM Plan.

The Public Works Director is accountable for ensuring that the Agency’s Safety Management Systems (SMS) is effectively implemented throughout the Agency’s public transportation system. The Public Works Director is accountable for ensuring action is taken as necessary, to address substandard performance in the Agency’s SMS. The Public Works Director may delegate specific responsibilities, but the ultimate accountability for the Transit Agency’s safety performance cannot be delegated and always rests with the Public Works Director.

Chief Safety Officer

The Public Works Director designates the Transit Manager as City of Tracy’s Chief Safety Officer who has the authority and responsibility for day-to-day implementation and operation of the Agency’s SMS. The Chief Safety Officer holds a direct line of reporting to the Accountable Executive, as shown in the organization chart in **Appendix A**, and has a strong working relationship with the operations and asset management functions at City of Tracy.

2. PLAN DEVELOPMENT, APPROVAL, AND UPDATES

The City of Tracy developed the contents of this Public Transportation Agency Safety Plan (PTASP) to meet the requirements specified in 49 CFR Part 673. This Plan is based on the four (4) principles or pillars of the Safety Management System (SMS). SMS is defined as the formal, top-down, organization-wide, data-driven approach to managing safety risk and assuring the effectiveness of safety mitigations. It includes systematic policies, procedures, and practices for the management of safety risk. The four principles or pillars of SMS are: (1) Safety Management Policy; (2) Safety Risk Management; (3) Safety Assurance; and (4) Safety Promotion.

The Federal Transit Administration (FTA) will oversee compliance with the requirements of Part 673 through the existing Triennial Review Process.

Signature by the Accountable Executive

The City of Tracy developed this plan. By signature below, the Accountable Executive confirms the development of this plan.

Signed by:

7429F1FE647E459...

Arturo Sanchez, Accountable Executive

6/26/2025 | 12:10 PM PDT

Date Signed

Approval by Tracy City Council

The Tracy City Council approved the original Plan during its December 15, 2020 City Council meeting, as documented in Resolution # 2020-206. Documentation of Council approval is found in **Appendix B**.

This updated plan in its current for was approved by the Tracy City Council during its May 6, 2025. Documentation of the approval of the update is documented in Resolution #2025-XXX found in **Appendix B**.

Certification of Compliance

Pursuant to 49 CFR Parts 673.13(a) and 673.13(b), City of Tracy certifies that it has established this Agency Safety Plan, meeting the requirements of 49 CFR Part 673 by December 31, 2020. FTA does not require this plan to be submitted to FTA. Instead, City of Tracy will certify that it has established this Safety Plan, which fulfills the requirements under Part 673. FTA annually amends and issues the list of Certifications and Assurances. City of Tracy will review such guidance for incorporation into the safety program as necessary. Certification of compliance with Part 673 will be completed annually in the Transit Award Management System (TrAMS) by both the Assistant City Manager and the City Attorney, who are the designated officials for the certification.

Plan Review & Updates

This Plan was reviewed in cooperation with frontline transit worker representatives.

City of Tracy updates this Safety Plan when information, processes or activities change within the Agency and/or when Part 673 undergoes significant changes, or annually, whichever comes sooner. As City of Tracy collects data through its Safety Risk Management and Safety Assurance processes, shared with the California Department of Transportation (Caltrans), and the local Metropolitan Planning Organization, San Joaquin Council of Governments (SJCOG). SJCOG and Caltrans will evaluate City of Tracy's Safety Performance Targets (SPTs) to determine whether they need to be changed, as well.

This Plan will be jointly reviewed and updated by the Chief Safety Officer, Safety Manager, and frontline transit worker representatives with the assistance of subject matter experts, each **July**, or earlier as needed. The Accountable Executive will approve any changes, then forward on to the Tracy City Council for approval.

This Plan may need to be reviewed and updated more frequently based on the following:

- We determine our approach to mitigating safety deficiencies is ineffective;
- We make significant changes to service delivery;
- We introduce new processes or procedures that may impact safety;
- We change or re-prioritize resources available to support SMS;
- We significantly change our organizational structure.

A Record of Revisions that records the history of revisions made to the City of Tracy's PTASP is contained in **Appendix C** of this document. This document is located in the appendix to help preserve page numbering.

The current version of this plan can be found at ridetracer.com. **3. DEFINITIONS AND ACRONYMS**

The following definitions may be used throughout this document, and correspond to the definitions provided in 49 CFR 673.5.

Accident means an “event”, as defined below, that involves any of the following:

1. A loss of life,
2. A report of a serious injury to a person,
3. A collision of public transportation vehicles,
4. A runaway train,
5. An evacuation for life safety reasons, or
6. Any derailment of a rail transit vehicle (any location, any time, any cause).

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

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

Equivalent Authority means an entity that carries out duties similar to that of a Board of Directors, for a recipient or subrecipient of FTA funds under 49 U.S.C. Chapter 53, including sufficient authority to review and approve a recipient or subrecipient's Public Transportation Agency Safety Plan.

Event means an “accident”, as defined above, or “incident” or “occurrence” (each as defined below).

FTA means the Federal Transit Administration, an operating administration within the United States Department of Transportation.

Hazard means any real or potential condition that can cause injury, illness, or death; damage to or loss of the facilities, equipment, rolling stock, or infrastructure of a public transportation system; or damage to the environment (as defined below).

Incident means an “event” (as defined above), that involves any of the following:

1. A personal injury that is not a serious injury,
2. One or more injuries requiring medical transport, or

3. Damage to facilities, equipment, rolling stock, or infrastructure that disrupts the operations of a transit agency.

Investigation means the process of determining the causal and contributing factors of an “accident”, “incident”, or “hazard” (each as defined here), for the purpose of preventing recurrence and mitigating risk.

National Public Transportation Safety Plan means the plan to improve the safety of all public transportation systems that receive federal financial assistance under 49 U.S.C. Chapter 53.

Occurrence means an “event” (as defined above), without any personal injury in which any damage to facilities, equipment, rolling stock, or infrastructure does not disrupt the operations of a transit agency.

Operator of a public transportation system means a provider of public transportation as defined under 49 U.S.C. 5302(14).

Performance measure means an expression based on a quantifiable indicator of performance or condition that is used to establish targets and to assess progress toward meeting the established targets.

Performance target means a quantifiable level of performance or condition, expressed as a value for the measure, to be achieved within a time period required by the Federal Transit Administration (FTA).

Public Transportation Agency Safety Plan (PTASP) means the documented comprehensive agency safety plan for a transit agency that is required by 49 U.S.C. 5329 and Part 673.

Risk means the composite of predicted severity and likelihood of the potential effect of a hazard.

Risk mitigation means a method or methods to eliminate or reduce the effects of hazards.

Safety Assurance means processes within a transit agency's Safety Management System that functions to ensure the implementation and effectiveness of safety risk mitigation, and to ensure that the transit agency meets or exceeds its safety objectives through the collection, analysis, and assessment of information.

Safety Management Policy means a transit agency’s documented commitment to safety, which defines the transit agency’s safety objectives and the accountabilities and responsibilities of its employees in regard to safety.

Safety Management System (SMS) means the formal, top-down, organization-wide approach to managing safety risk and assuring the effectiveness of a transit agency’s safety risk mitigation. SMS includes systematic procedures, practices, and policies for managing risks and hazards.

Safety Performance Target (SPT) means a Performance Target related to safety management activities.

Safety Promotion means a combination of training and communication of safety information to support SMS as applied to the transit agency's public transportation system.

Safety Risk Assessment (SRA) means the formal activity whereby a transit agency determines Safety Risk Management priorities by establishing the significance or value of its safety risks.

Safety Risk Management (SRM) means a process within a transit agency's Public Transportation Agency Safety Plan for identifying hazards and analyzing, assessing, and mitigating safety risk.

Serious injury means any injury which:

1. Requires hospitalization for more than 48 hours, commencing within 7 days from the date of the injury was received;
2. Results in a fracture of any bone (except simple fractures of fingers, toes, or noses);
3. Causes severe hemorrhages, nerve, muscle, or tendon damage;
4. Involves any internal organ; or
5. Involves second- or third-degree burns, or any burns affecting more than 5 percent of the body surface.

Small public transportation provider means a recipient or subrecipient of Federal financial assistance under 49 U.S.C. 5307 that has one hundred (100) or fewer vehicles in peak revenue service and does not operate a rail fixed guideway public transportation system.

State means a State of the United States, the District of Columbia, Puerto Rico, the Northern Mariana Islands, Guam, American Samoa, and the Virgin Islands.

State of Good Repair (SGR) means the condition in which a capital asset is able to operate at a full level of performance.

Transit Agency means an operator of a public transportation system.

Transit Asset Management Plan means the strategic and systematic practice of procuring, operating, inspecting, maintaining, rehabilitating, and replacing transit capital assets to manage their performance, risks, and costs over their life cycles, for the purpose of providing safe, cost-effective, and reliable public transportation, as required by 49 U.S.C. 5326 and 49 CFR part 625.

COMMONLY USED ACRONYMS:

ADA	-	Americans with Disabilities Act of 1990
ASP	-	Agency Safety Plan (also referred to as a PTASP in Part 673)
CFR	-	Code of Federal Regulations
ESRP	-	Employee Safety Reporting Program
CSO	-	Chief Safety Officer
FTA	-	Federal Transit Administration
MAP-21	-	Moving Ahead for Progress in the 21st Century
MPO	-	Metropolitan Planning Organization
NTD	-	National Transit Database
Part 673	-	49 CFR Part 673 (Public Transportation Agency Safety Plan)
PTASP	-	Public Transportation Agency Safety Plan
SGR	-	State of Good Repair
SMS	-	Safety Management System
SOP	-	Standard Operating Procedure
SRM	-	Safety Risk Management
TAM	-	Transit Asset Management
U.S.C.	-	United States Code
VRM	-	Vehicle Revenue Miles

4. SAFETY PERFORMANCE TARGETS (SPTs)

As part of this Safety Plan, the City of Tracy has developed Safety Performance Targets (SPTs) that it will review and update annually. The specific safety performance targets are based on the safety performance measures established under the National Public Transportation Safety Plan. The updated plan identifies 14 safety performance measures Which are listed and described in the table below. The safety performance targets set by City of Tracy are based on the past five (5) fiscal years of data. These targets for the year 2025 are expected to stay within +/- 1% of the previous five years' data pertaining to the 14 safety performance measures.

Safety Performance Measure		Description
1	Major Events	This includes all safety and security major events as defined by the NTD.
2	Major Event Rate	This includes all safety and security major events as defined by the NTD, divided by VRM.
3	Collision Rate	This includes all collisions reported to the NTD, divided by VRM.
4	Pedestrian Collision Rate	This includes all collisions “with a person,” as defined by the NTD, divided by VRM.
5	Vehicular Collision Rate	This includes all collisions “with a motor vehicle,” as defined by the NTD, divided by VRM.
6	Fatalities	This includes all fatalities as defined by the NTD.
7	Fatality Rate	This includes all fatalities as defined by the NTD, divided by VRM.
8	Transit Worker Fatality Rate	This includes all transit worker fatalities as defined by the NTD, including the categories “Transit Employee/Contractor,” “Transit Vehicle Operator,” and “Other Transit Staff,” divided by VRM.
9	Injuries	This includes all injuries as defined by the NTD.
10	Injury Rate	This includes all injuries as defined by the NTD, divided by VRM.
11	Transit Worker Injury Rate	This includes all transit worker injuries as defined by the NTD, including the categories “Transit Employee/Contractor,” “Transit Vehicle Operator,” and “Other Transit Staff,” divided by VRM.
12	Assaults on Transit Workers	This includes all assaults on transit workers as defined by the NTD.
13	Rate of Assaults on Transit Workers	This includes all assaults on transit workers as defined by the NTD, divided by VRM.
14	System Reliability	This includes Major Mechanical System failures as defined by the NTD.

Safety Performance Targets		
Service Mode	Fixed Route Bus (MB)	Demand Response/ADA Paratransit (DR)
Major Events (Total # of Reportable Events)	0	0
Major Event Rate (Rate per total VRM)	0	0
Collision Rate (Rate per total VRM)	0	0
Pedestrian Collision Rate (Rate per total VRM)	0	0
Vehicular Collision Rate (Rate per total VRM)	0	0
Fatalities (Total # of Reportable Fatalities)	0	0
Fatality Rate (Rate per total VRM)	0	0
Transit Worker Fatality Rate (Total # of Reportable Injuries)	0	0
Injuries (Total # of Reportable Injuries)	0	0
Injury Rate (Rate per total VRM)	0	0
Transit Worker Injury Rate (Rate per total VRM)	0	0
Assaults on Transit Workers (Total # of Reportable Injuries)	0	0
Rate of Assaults on Transit Workers (Rate per total VRM)	0	0
System Reliability: Average Distance b/w Major Mechanical Failures (Failures / VRM)	50,000 miles	30,000 miles

Major Events

The City of Tracy has had one reportable major event in the past five years.

Collisions

The City of Tracy has had zero reportable collisions in the past five years.

Pedestrian Collisions

The City of Tracy has had zero reportable pedestrian collisions in the past five years.

Vehicle Collisions

The City of Tracy has had zero reportable vehicle collisions in the past five years.

Fatalities

The City of Tracy has had zero reportable fatalities in the past five years.

Injuries

The City of Tracy has had three reportable injuries in the past five years.

Transit Worker Assaults

The City of Tracy has had one transit worker assault in the past five years.

System Reliability

The City of Tracy has an average of 40,329 vehicle revenue miles between major mechanical failures in fixed route.

The City of Tracy has an average of 22,807 vehicle revenue miles between major mechanical failures in Dial-A-Ride.

To calculate SPTs, the City of Tracy referred to system safety data, including:

- Near miss information
- Accident investigation reports (with causal factor analysis)
- Internal safety audits (or reviews)
- Injury reports
- Safety event reports (including accidents, incidents, and occurrences)
- System monitoring (including monthly reports, and testing and inspection records)

Safety Performance Target Coordination

FTA requires City of Tracy to coordinate with the State of California Department of Transportation (Caltrans) and the regional MPO, San Joaquin Council of Governments (SJCOG), in the selection of state and MPO safety performance targets, to the maximum extent practicable. Pursuant to 49 CFR Part 673.15(a), City of Tracy will make safety performance targets available

to Caltrans and SJCOG to aid in the planning process upon certification of this plan. Additionally, City of Tracy will transmit performance data against the safety performance targets to Caltrans and SJCOG on an annual basis.

5. OVERVIEW OF SAFETY MANAGEMENT SYSTEM (SMS)

SMS is a comprehensive, collaborative approach that brings management and labor together to build on the transit industry's existing safety foundation to control risk better, detect and correct safety problems earlier, share and analyze safety data more effectively, and measure safety performance more carefully. City of Tracy's SMS focuses on applying resources to risk and is based on ensuring that the City of Tracy has the organizational infrastructure to support decision-making at all levels regarding the assignment of resources. Some key parts of City of Tracy's SMS include:

- Defined roles and responsibilities;
- Strong executive safety leadership;
- Formal safety accountabilities and communication;
- Effective policies and procedures; and
- Active employee involvement

Furthermore, City of Tracy's SMS has four distinct components, which are discussed in subsequent sections to this Safety Plan:

- Safety Management Policy
- Safety Risk Management
- Safety Assurance
- Safety Promotion

6. SAFETY MANAGEMENT POLICY (SMP)

The first component of the City of Tracy's SMS is the Safety Management Policy, which is the foundation of the City of Tracy's safety management system. It clearly states the organization's safety objectives and sets forth the policies, procedures, and organizational structures necessary to accomplish the safety objectives. The Safety Management Policy clearly defines management and employee responsibilities for safety throughout the organization. It also ensures that management is actively engaged in the oversight of the system's safety performance by requiring regular review of the Safety Management Policy, budget and program by the designated Accountable Executive.

City of Tracy Safety Management Policy (SMP)

Safety is a core value at City of Tracy and managing safety is a core business function. City of Tracy will develop, implement, maintain, and continuously improve processes to ensure the safety of our customers, employees, and the public. City of Tracy's overall safety objective is to proactively manage safety hazards and their associated safety risk, with the intent to eliminate unacceptable safety risk in our transit operations.

City of Tracy will:

- Clearly, and continuously explain to all staff that everyone working within City of Tracy must take part and be responsible and accountable for the development and operation of the Safety Management System (SMS).
- Work continuously to minimize safety risks. Work to comply with and, wherever possible, exceed legislative and regulatory requirements and standards for passengers and employees.
- Work to ensure that all employees are provided appropriate safety information and training, are competent in safety matters, and assigned tasks commensurate with duties and skills.
- Reaffirm that responsibility for making our operations safer for everyone lies with all employees – from executive management to frontline employees. Each manager is responsible for implementing the SMS in their area of responsibility and will be held accountable to ensure that all reasonable steps are taken to perform activities established through the SMS.
- Conduct Safety Meetings which include both management and frontline transit worker representatives to assess and take action as necessary for all potential safety hazards that are reported.

City of Tracy established safety performance targets to help measure the overall effectiveness of our processes and ensure we meet our safety objectives. City of Tracy will keep employees informed about safety performance goals and objectives to ensure continuous safety improvement.

Safety Management Policy Communication

The Safety Management Policy is communicated throughout the Agency, to all employees, managers, and executives, as well as contractors, and to the Tracy City Council.

This is accomplished through various processes such as:

- Workshops/training sessions - Conducted for Senior Management, Directors, Managers, Supervisors. Once this Plan or any update to this Plan has been signed by the CEO/General Manager approved by the Board of Directors and certified by Caltrans it will become standard practice in perpetuity so that SMS becomes standard business practice. All Union representatives will be kept informed.
- New Hire Safety Orientation – All new employees regardless of their classifications will be trained about their roles and responsibilities pertaining to PTASP and the principles of SMS.
- Safety bulletins, email safety newsletter blasts to staff, toolbox/tailgate safety meetings and/or safety committee meetings

Employee Safety Reporting Program

City of Tracy implemented a process that allows employees [and contracted employees] to report safety conditions to senior management, protections for employees who report safety conditions to senior management. The purpose, description and protections for employees to report unsafe conditions and hazards are described in the Employee Safety Reporting Program as below:

Purpose:

a) To establish a system for City of Tracy employees to identify unsafe conditions or hazards at work and report them to their department management without fear of reprisal. However, disciplinary action could result if the condition reported reveals the employee willfully participated in or conducted an illegal act, gross negligence or deliberate or willful disregard of regulations or procedures, including reporting to work under the influence of controlled substances, physical assault of a coworker or passenger, theft of agency property, unreported safety events, unreported collisions, and unreported passenger injuries or fatalities.

b) To provide guidelines for facilitating the timely correction of unsafe conditions or hazards by City of Tracy management.

Description:

a) This program provides a method for City of Tracy management to identify, evaluate, and correct or avoid unsafe conditions or hazards, assaults on transit workers, procedural deficiencies, design inadequacies, equipment failures, or near misses that adversely affect the safety of employees.

Examples of voluntary safety reports include:

- Safety hazards in the operating environment (for example, county or city road conditions),
- Policies and procedures that are not working as intended (for example, insufficient time to complete pre-trip inspection),
- Events that senior managers might not otherwise know about (for example, near misses), and
- Information about why a safety event occurred (for example, radio communication challenges).

b) The program also involves recommending corrective actions and resolutions of identified unsafe conditions or hazards and/or near miss.

c) All employees have the obligation to report immediately any unsafe conditions or hazards and near miss to their immediate supervisor /department manager and may do so without fear of reprisal.

d) Unsafe conditions or hazards may also be identified as a result of occupational injury or illness investigations and/or by accident investigation.

e) Other means by which hazards may be identified are inspections/audits or observations made by the supervisors/management staff as referenced in agency's Safety Inspection Program.

f) Findings will be published immediately following mitigation actions. If employee identification is available, direct feedback regarding mitigation will be provided.

Non-Punitive Reporting Policy

City of Tracy is committed to the safest transit operating standards practicable. To achieve this, it is imperative that City of Tracy have uninhibited reporting of all safety events that may compromise safe operations. To this end, every employee is responsible for the communication of any information that may affect the integrity of transit safety. Such communication must be completely free of any form of reprisal.

City of Tracy will not take disciplinary action against any employee who discloses a safety event. This policy shall not apply to information received by City of Tracy from a source other than the employee, or that involves an illegal act, or a deliberate or willful disregard of rules, regulations, or agency policies or procedures.

City of Tracy's method of collection, recording, and disseminating information obtained from transit safety reports has been developed to protect, to the extent permissible by law, the identity of any employee who provides transit safety information.

SMS Authorities, Accountabilities, and Responsibilities

This Plan has assigned specific SMS authorities, accountabilities, and responsibilities to the designated Accountable Executive; Chief Safety Officer; Agency's Leadership/Executive Management; and Key Staff/Employees as described below:

Accountable Executive

City of Tracy's Accountable Executive is the Public Works Director. The Public Works Director is accountable for ensuring that the Agency's SMS is effectively implemented throughout the Agency's public transportation system. The Public Works Director is accountable for ensuring action is taken, as necessary, to address substandard performance in the Agency's SMS. The Public Works Director may delegate specific responsibilities, but the ultimate accountability for the City of Tracy's safety performance cannot be delegated and always rests with the Public Works Director. The Public Works Director is accountable for ensuring that the Agency's SMS is effectively implemented, and that action is taken, as necessary, to address substandard performance in the Agency's SMS. The Accountable Executive may delegate specific responsibilities, but not accountability for City of Tracy's safety performance.

The Public Works Director roles include, but are not limited to:

- Decision-making about resources (e.g. people and funds) to support asset management, SMS activities, and capital investments;
- Signing SMS implementation planning documents;
- Endorsing SMS implementation team membership; and
- Ensuring safety concerns are considered and addressed in the agency's ongoing budget planning process.
- Ensuring transparency in safety priorities: for the Board of Directors and for the employees.
- Establishing guidance on the level of safety risk acceptable to the agency.
- Assuring safety policy is appropriately communicated throughout the agency.
- Other duties as assigned/necessary.

Chief Safety Officer

The Chief Safety Officer has the authority and responsibility for day-to-day implementation and operation of the City of Tracy's SMS.

Chief Safety Officer's Roles include:

- Decision-making about resources (e.g., people and funds) to support asset management, SMS activities, and capital investments;

- Overseeing the safety risk management program by facilitating hazard identification, safety risk assessment, and the development and implementation of safety risk mitigations.
- Monitoring safety risk mitigation activities;
- Providing periodic reports on safety performance;
- Briefing the Accountable Executive and Tracy City Council on SMS implementation progress;
- Planning safety management training; and
- Developing and organizing annual audits/reviews of SMS processes and the Agency Safety Plan to ensure compliance with 49 CFR Part 673 requirements.
- Maintaining safety documentation.
- Other duties as assigned/necessary.

Key Staff

The Safety Manager, Contract General Manager, Contract Safety & Training Manager, Fleet Superintendent and Facilities Supervisor comprise Key Staff. Some of their responsibilities include:

- Day-to-day implementation of the Agency's SMS throughout their department and the organization.
- Communicating safety accountability and responsibility from the frontline employees to the top of the organization.
- Ensuring employees are following their working rules and procedures, safety rules and regulations in performing their jobs, and their specific roles and responsibilities in the implementation of this Agency Safety Plan and the Agency's SMS.
- Ensuring that employees comply with the safety reporting program and are reporting unsafe conditions and hazards to their department management; and making sure reported unsafe conditions and hazards are addressed in a timely manner.
- Ensuring that resources are sufficient to carry out employee training/certification and re-training as required by their job classifications.
- Ensuring safety of passengers, employees, and the public.
- Responding to customer complaints and expectations for frequency, reliability, and convenience of service.
- Replacing and maintaining aging facilities, equipment, and infrastructure.
- Meeting increasing demands for fixed route, commuter service and paratransit service.
- Developing and maintaining programs to gather pertinent data elements to develop safety performance reports and conduct useful statistical analyses to identify trends and system performance targets.
- Establishing clear lines of safety communication and holding accountability for safety performance.
- Assisting as subject matter experts in safety risk assessment and safety risk mitigation processes.

7. SAFETY RISK MANAGEMENT (SRM)

The second component of the City of Tracy's SMS is Safety Risk Management, which includes processes and procedures to provide an understanding of the Agency's operations and vehicle maintenance to allow individuals to identify hazards associated with those activities.

City of Tracy has implemented a Safety Risk Management process for all elements of its transportation system. The Safety Risk Management process includes the following activities:

- Safety hazard identification
- Safety risk assessment, and
- Safety risk mitigation.

Safety Hazard Identification

Hazard identification is the first step in the Safety Risk Management process and a key component. It involves these fundamental safety-related activities: Identifying safety hazards and their consequences; assessing the risks associated with the consequences of the hazards; and developing mitigations to reduce the potential consequences of the identified hazards.

The following is City of Tracy's methods and processes to identify hazards. The Agency considers, as a source for hazard identification, data and information provided by an oversight authority and the FTA. Hazards are identified through a variety of sources, including:

- Employee safety reporting,
- Safety concerns identified through Safety Assurance activities,
- Review of vehicle camera footage,
- Review of monthly performance data and safety performance targets,
- Observations from supervisors,
- Maintenance reports,
- Comments from customers, passengers, and third parties,
- Safety committee, driver and all-staff meetings,
- Results of audits and inspections of vehicles and facilities,
- Results of training assessments
- Investigations into safety events, incidents and occurrences,
- Information from FTA and oversight authorities,
- Information from the Center for Disease Control and Prevention (CDC) or a State or local health authority regarding exposure to infectious diseases.

When a hazard has been identified, whatever the source, it is reported to the City of Tracy Chief Safety Officer, who enters it into the Hazard Log. The Chief Safety Officer also may enter hazards into this log based on reviews of operations and maintenance activities and procedures.

The Chief Safety Officer will investigate hazards to collect information and determine if hazards need to be entered into the safety risk assessment process. In following up on identified hazards, the Chief Safety Officer may:

- Reach out to the reporting party, if available, to gather all known information about the reported hazard,
- Conduct a walkthrough of the affected area, assessing the possible hazardous condition, generating visual documentation (photographs and/or video), and taking any measurements deemed necessary,
- Conduct interviews with employees in the area to gather potentially relevant information on the reported hazard,
- Review any documentation associated with the hazard (records, reports, procedures, inspections, technical documents, etc.),
- Contact other departments that may have association with or technical knowledge relevant to the reported hazard,
- Review any past reported hazards of a similar nature, and
- Evaluate tasks and/or processes associated with the reported hazard.

City of Tracy's Chief Safety Officer will then prepare an agenda to discuss identified hazards and consequences with the Safety Committee during monthly meetings. This agenda may include additional background on the hazards and consequences, such as the results of trend analyses, vehicle camera footage, vendor documentation, reports and observations, or information supplied by FTA or other oversight authorities.

Any identified hazard that poses an immediate risk to transit operations, the health and safety of employees or the public, or equipment must immediately be brought to the attention of the Accountable Executive and placed through the Safety Risk Management process for safety risk assessment and mitigation. Otherwise, hazards will be prioritized for further Safety Risk Management activity.

Safety Risk Assessment

Safety risk assessment defines the level or degree of the safety risk by assessing the likelihood and severity of the consequences of hazards and prioritizes hazards based on the safety risk. The Chief Safety Officer, with assistance from key staff subject matter experts, is responsible for assessing identified hazards and ratings using the safety risk matrix below. The assessment will also take into account existing safety risk mitigations. Prioritizing safety risk provides the Accountable Executive with the information needed to make decisions about resource application.

The following matrix, adopted from the TSI Participation Guide – SMS Principles for Transit, facilitates the ranking of hazards based on their probability of occurrence and severity of their outcome.

Probability Levels			
Description	Level	Specific Individual Item	Fleet Inventory
Frequent	A	Likely to occur often in the life of an item.	Continuously experienced.
Probable	B	Will occur several times in the life of an item.	Will occur frequently.
Occasional	C	Likely to occur sometime in the life of an item.	Will occur several times.
Remote	D	Unlikely, but possible to occur in the life of an item.	Unlikely, but can reasonably be expected to occur.
Improbable	E	So unlikely, it can be assumed occurrence man not be experienced in the life of an item.	Unlikely to occur, but possible.
Eliminated	F	Incapable of occurrence. This level is used when potential hazards are identified and later eliminated.	Incapable of occurrence. This level is used when potential hazards are identified and later eliminated.

The measuring goes from A to F with A being frequent or likely to occur frequently and E being improbable or expected that this event will most likely never occur. The designation F is used when potential hazards are identified and later eliminated.

Severity Levels		
Description	Level	Mishap Result Criteria
Catastrophic	1	Could Result in one or more of the following: death, permanent total disability, irreversible significant environmental impact, or monetary loss equal to or exceeding \$10M
Critical	2	Could result in one or more of the following: permanent partial disability, injuries or occupational illness that may result in hospitalization of at least three personnel, reversible significant environmental impact, or monetary loss equal to or exceeding \$1M but less than \$10M
Marginal	3	Could result in one or more of the following: injuries or occupational illness resulting in one or more lost work day(s), reversible moderate environmental impact, or monetary loss equal to or exceeding \$100k but less than \$1M
Negligible	4	Could result in one or more of the following: injuries or occupational illness not resulting in lost work day, minimum environmental impact. Or monetary loss less than \$100k.

The Safety Risk Severity Table presents a typical safety risk. It includes four categories to denote the level of severity of the occurrence of a consequence, the meaning of each category, and the assignment of a value to each category using numbers. In this table, 1 is considered catastrophic meaning possible deaths and equipment destroyed and 4 is considered negligible or of little consequence with two levels in between.

Safety Risk Probability and Safety Risk Severity are combined into the Safety Risk Index Ranking to help prioritize safety risks according to the table below.

Safety Risk Assessment Matrix				
Severity → Probability ↓	Catastrophic 1	Critical 2	Marginal 3	Negligible 4
A-Frequent	1A	2A	3A	4A
B- Probable	1B	2B	3B	4B
C-Occasional	1C	2C	3C	4C
D- Remote	1D	2D	3D	4D
E- Improbable	1E	2E	3E	4E
F- Eliminated				
Safety Risk Index Ranking				
1A, 1B, 1C, 2A, 2B	High	Unacceptable		
1D, 2C, 3A, 3B	Serious	Undesirable - With management decision required		
1E, 2D, 2E, 3C, 3D, 3E, 4A, 4B,	Medium	Acceptable - with review by management		
4C, 4D, 4E	Low	Acceptable - without review		

The Chief Safety Officer documents recommendations regarding hazard rating and mitigation options and reports this information to the Accountable Executive.

Safety Risk Mitigation

The Chief Safety Officer, assisted by Key Staff subject matter experts, reviews current safety risk mitigations and establish procedures to 1) eliminate; 2) mitigate; 3) accept specific risks. Prioritization of safety remediation measures is based on risk analysis and a course of action acceptable to City of Tracy management.

The safety risk must be mitigated if ranked as Unacceptable (High- Red). Those safety risks that have been mitigated, even those mitigated risks shown as Acceptable status (Low -Green) undergo regular and consistent monitoring to ensure the mitigation strategy is effective.

Key strategies to minimize the types of risks that potentially exist include:

- Development and deployment of policies and procedures that address known hazards and risks,
- Discussion of other actions, strategies and procedures that might help safeguard against unknown/unforeseen risks,
- Training of drivers and other agency staff on all safety policies and procedures,
- Training of drivers and other agency staff on methodologies for handling emergencies, and
- Training of drivers and staff on proper and effective use of emergency equipment and communication technologies and protocol.
- Review of guidance by any applicable oversight authority and the FTA.

- Consideration of guidelines to prevent or control exposure to infectious diseases provided by the CDC or a State or local health authority.

Safety risk mitigations are tracked and updated in the Hazard Log by the Chief Safety Officer.

General Directive No. 24-1

FTA has issued a General Directive to address the significant and continuing safety risk associated with assaults on transit workers. FTA has identified a national-level hazard that transit workers must interact with the public and, at times, must clarify or enforce agency policies, which can present a risk of transit workers being assaulted on transit vehicles and in revenue facilities.

In accordance with General Directive 24-1, a safety risk assessment related to assaults on transit workers on the public transportation system has been conducted and safety risk mitigations have been identified. Responses to the required questions in General Directive 24-1 have been submitted to the FTA.

8. SAFETY ASSURANCE

The third component of the Agency's SMS is Safety Assurance, which ensures the performance and effectiveness of safety risk controls established under safety risk management. Safety assurance also helps ensure that the organization meets or exceeds its safety objectives through the collection, analysis, and assessment of data regarding the organization's performance. Safety assurance includes inspection activities to support oversight and performance monitoring.

The City of Tracy monitors its operations and maintenance protocols and procedures, and any safety risk mitigations to ensure that it is implementing them as planned. Furthermore, the Agency investigates safety events and any reports of non-compliance with applicable regulations, standards, and legal authority. Finally, the Agency continually monitors information reported to it through any internal safety reporting programs, including the employee safety reporting program.

Some of the key elements of City of Tracy's Safety Performance Monitoring and Measurement are shown below:

Safety Performance Monitoring and Measurement

As part of the Safety Assurance Process, City of Tracy:

- **Monitors the system for compliance with, and sufficiency of, the Agency's procedures for operations and maintenance through:**
 - Safety audits,

- Informal inspections,
 - Regular review of on-board camera footage to assess drivers and specific incidents,
 - Safety surveys,
 - Employee Safety Reporting Program (ESRP),
 - Investigation of safety occurrences,
 - Safety review prior to the launch or modification of any facet of service,
 - Daily data gathering and monitoring of data relating to the delivery of service,
 - Regular vehicle inspections and preventative maintenance, and
 - Continuous feedback loop between leadership and all levels of the agency.
- **Monitors its operations to identify any safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended through:**
 - Reviewing results from accident, incident, and occurrence investigations,
 - Monitoring employee safety reporting,
 - Reviewing results of internal safety audits and inspections, and
 - Analyzing operational and safety data to identify emerging safety concerns.

- **Conducts investigations of safety events to identify causal factors:**

City of Tracy maintains documented procedures for conducting safety investigations of events (accidents, incidents, and occurrences, as defined by FTA) to find causal and contributing factors and review the existing mitigations in place at the time of the event. These procedures also reflect all traffic safety reporting and investigation requirements established by California Department of Motor Vehicles.

The Chief Safety Officer maintains all documentation of City of Tracy’s investigation policies, processes, forms, checklists, activities, and results. After an incident, an investigation report is prepared and reviewed by the Chief Safety Officer, Safety Manager, and contract staff General Manager and Safety and Training manager to determine:

- If the accident was preventable or non-preventable
 - Personnel require discipline or retraining
 - The causal factor(s) indicate(s) that a safety hazard contributed to or was present during the event; and
 - If the accident appears to involve underlying organizational causal factors beyond just individual employee behavior.
- **Monitors information reported through any internal safety reporting programs:**
 - The Chief Safety Officer routinely reviews safety data captured in employee safety reports, safety meeting minutes, customer complaints, and other safety communication channels. When necessary, the Chief Safety Officer ensures that the issues and concerns are investigated or analyzed through the safety risk assessment process.

- The Chief Safety Officer also reviews the results of internal and external reviews, including audits and assessments, with findings affecting safety performance, compliance with operations and maintenance procedures, or the effectiveness of safety risk mitigations. The Chief Safety Officer discusses relevant safety issues and concerns with the Accountable Executive and executive management and documents the results of these reviews in the Hazard Log.

In the event of a fatality, the City of Tracy complies with all FTA drug and alcohol requirements. In California, every driver involved in an accident that results in death, injury, or property damage over \$1,000, effective January 1, 2017, must report the accident on a Report of Traffic Accident Occurring in California (SR 1) form to DMV. The report forms are available at www.dmv.ca.gov, by calling 1-800-777-0133, and at CHP and DMV offices. Also, under California Vehicle Code §16002(b) the driver of a vehicle that is owned or operated by a publicly owned or operated transit system, or that is operated under contract with a publicly owned or operated transit system, and that is used to provide regularly scheduled transportation to the general public or for other official business of the system shall, within 10 days of the occurrence of the accident, report to the transit system any accident of a type otherwise required to be reported pursuant to subdivision (a) of Section 16000. The City of Tracy requires driver notification to the City of Tracy immediately and maintains records of any report filed pursuant to this paragraph.

9. SAFETY PROMOTION

The fourth component of the Agency's SMS is Safety Promotion, which includes a combination of training and communication of safety information to employees to enhance the Agency's safety performance. Safety Promotion sets the tone for the SMS and helps City of Tracy to establish and maintain a robust safety culture. Safety Promotion has two-components: (1) Safety Communication; and (2) Competencies and Training.

City of Tracy believes safety promotion is critical to the success of an SMS by ensuring that the entire organization fully understands and trusts its safety policies, procedures, and structure. Further, safety promotion involves establishing an organizational and workplace culture that recognizes safety as a core value, training employees in safety principles, and allowing open communications of safety issues.

Safety Communication & Safety Culture

Positive safety culture must be generated from the top. The actions, attitudes, and decisions at the policy-making level must demonstrate a genuine commitment to safety. Safety must be recognized as the responsibility of each employee, with the ultimate responsibility for safety resting with Executive Management. Employees must trust that they will have management support for decisions made in the interest of safety, while also recognizing that intentional breaches of safety will not be tolerated.

The primary goal of safety promotion at City of Tracy is to develop a positive safety culture that allows the SMS to succeed. A positive safety culture is defined as one which is:

A. An Informed Culture

- Employees understand the hazards and risks involved in their areas of operation
- Employees are provided with the necessary knowledge, training and resources
- Employees work continuously to identify and overcome threats to safety

B. A Just Culture

- Employees know and agree on what is acceptable and unacceptable behavior
- Human errors must be understood, but negligence and willful violations cannot be tolerated

C. A Reporting Culture

- Employees are encouraged to voice safety concerns and to share critical safety information without the threat of punitive action
- When safety concerns are reported, they are analyzed, and appropriate action is taken

D. A Learning Culture

- Learning is valued as a lifetime process beyond basic-skills training

- Employees are encouraged to develop and apply their own skills and knowledge to enhance safety
- Employees are updated on safety issues by management, and safety reports are fed back to staff so that everyone learns the pertinent lessons

City of Tracy communicates safety and safety performance information throughout the organization that, at a minimum, conveys information on hazards and safety risks relevant to employees' roles and responsibilities and informs employees of safety actions taken in response to reports submitted through an employee safety reporting program. The results of cooperation with frontline transit workers in developing and updating this plan will be communicated at a monthly Safety Committee meeting.

Ongoing safety communication is critical and City of Tracy ensures communication occurs up, down, and across all levels of the organization. Any lessons learned are communicated to all concerned. Management commitment to address safety concerns and hazards is communicated on a regular basis. Management encourages and motivates employees to communicate openly, authentically, and without concern for reprisal; ensures employees are aware of SMS principles and understand their safety-related roles and responsibilities; conveys safety critical information such as accident data, injuries, and reported safety concerns and hazards and their resolutions to employees. City of Tracy's tools to support safety communication include:

- Safety bulletins
- Safety notices
- Posters
- CDs or Thumb drives or online safety video access
- Newsletters
- Briefings or Toolbox talks
- Seminars and workshops
- New employee training and refresher training
- Intranet or social media
- Safety Committee Meetings

Safety promotion activities and processes include the following:

- Monthly Transit Operations Contractor Safety meetings and postings for drivers
- Safety bulletin boards

Continuous Improvement

Annually, after the end of the fiscal year, the established Safety Committee will evaluate its safety performance programs to verify compliance, identify safety deficiencies, or to develop plans to address any identified safety deficiencies with the overall goal of continually improving the City of Tracy's safety programs. This will include identifying any deficiencies in the SMS and reviewing the previous fiscal year's performance against the safety performance targets.

The Safety Committee will develop recommendations to address any deficiencies identified through the safety performance assessment process which will include but are not limited to the

reason for the recommendation, potential cost to implement, and potential timeline to implement. Any recommendations will be discussed with the Accountable Executive, who will provide the necessary concurrence to carry out the implementation plan.

Competencies & Training

Executive Management ensures that all employees attend the training provided to understand their specific roles and responsibilities for the implementation of SMS. City of Tracy provides SMS training in the following areas:

All Employees:

- Understanding of Safety Performance Targets
- Understanding of fundamental principles of SMS
- Understanding of Safety Reporting Program – Reporting unsafe conditions and hazards/near misses
- Understanding of their individual roles and responsibilities under SMS

Managers and Supervisors

- Understanding of Safety Risk Management
- Understanding of Safety Assurance
- Understanding of Safety Promotion
- Understanding of their individual roles and responsibilities for SMS

Executive Management:

- Understanding of management commitment to and support of all SMS activities.

All employees are required to acquire the competencies and knowledge for the consistent application of their skills as they relate to safety performance objectives. City of Tracy dedicates resources to conduct effective safety-related skill training. The scope of the safety training is appropriate to each employee's individual safety-related job responsibilities and their role in SMS. Components of City of Tracy's skill-related training include:

- Conducting training needs analyses to ensure that the right information is being taught to the right employees using the most efficient training methods.
- Communicating purpose, objectives, and outcome.
- Ensuring relevant content by directly linking training to the trainee's job experiences so trainees are more motivated to learn.
- Using active hands-on demonstrations and practice to demonstrate skills that are being taught and provide opportunities for trainees to practice skills.
- Providing regular feedback during hands-on practice and exercises.
- Reinforcing training concepts in the post-training work environment by giving employees opportunities to perform what they've learned.

City of Tracy's comprehensive safety training program applies to all City of Tracy employees and contract staff directly responsible for safety, including:

- Bus vehicle operators,
- Dispatchers,
- Maintenance technicians,
- Managers and supervisors,
- Agency Leadership and Executive Management,
- Chief Safety Officer, and
- Accountable Executive.

City of Tracy dedicates resources to conduct a comprehensive safety training program, as well as training on SMS roles and responsibilities. The scope of the safety training, including annual refresher training, is appropriate to each employee's individual safety-related job responsibilities and their role in the SMS.

Basic training requirements for City of Tracy employees, including frequencies and refresher training, are documented in City of Tracy's Safety Training Matrix and the City of Tracy Employee Handbook. Contracted operations safety-related skill training includes the following:

- New-hire bus vehicle operator classroom and hands-on skill training,
- Bus vehicle operator refresher training,
- Bus vehicle operator retraining (recertification or return to work),
- Classroom and on-the-job training for dispatchers,
- Classroom and on-the-job training for operations supervisors and managers, and
- Accident investigation training for operations supervisors and managers. Vehicle maintenance safety-related skill training includes the following:
 - Ongoing vehicle maintenance technician skill training,
 - Ongoing skill training for vehicle maintenance supervisors,
 - Accident investigation training for vehicle maintenance supervisors,
 - De-escalation training,
 - Safety concern identification and reporting,
 - Ongoing hazardous material training for vehicle maintenance technicians and supervisors, and

- Training provided by vendors.

City of Tracy's Accountable Executive and Agency Leadership and Executive Management team must complete FTA's SMS Awareness online training.

City of Tracy conducts refresher training **quarterly** during employee safety meetings.

10. DOCUMENTATION

Pursuant to 49 CFR Part 673.31, City of Tracy maintains records related to this Safety Plan and Safety Management System (SMS) implementation for a minimum of three years. These documents include but are not limited to:

- The implementation of the SMS
- The programs, policies and procedures used to carry out this Agency Safety Plan
- The results from SMS processes and activities

City of Tracy will make these documents available to FTA Region 9, Caltrans, and other Federal and state agencies upon request.