



Safety and Security Certification Audit Report December 15, 2025

Projects: Federal Way Link Extension

Audit Type: Safety & Security Audit Profiles 4000, 6000 and 7000

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I. EXECUTIVE SUMMARY

Commencing in September 2025, and extending through November 2025, Talson Solutions, LLC (Talson) and subcontractor Transportation Resources Associates (TRA) performed a Safety and Security Certification Audit (SSCA) of Sound Transit's Federal Way Link Extension project (FWLE) in advance of FWLE public ridership and revenue operations. The audit was performed on behalf of the Sound Transit's Audit Division and focused on System Integrated and Pre-Operational Testing, Operations and Maintenance Readiness, System Readiness, Fire/Life/Safety, and the accuracy of the Safety and Security Certification Verification Report (SSCVR) issued by Sound Transit Transportation Safety and Security.

The objective of a SSCA is to verify that construction, testing and operational activities are in conformance with Sound Transit's hazard mitigation plans, certification policy, and associated Audit Profiles (AP). Sound Transit uses Certifiable Item (CI) forms in the Safety and Security Information Management System (SSIMS) database as evidence that hazard mitigating documentation is created and maintained in accordance with required specifications and plans. Hazard mitigation and certification standards are detailed within Safety and Security Certification (SSCP) and Safety and Security Management (SSMP) Plans.

The Audit Team found that the overall safety certification process is in conformance with the project specific SSMP and the Agency SSCP. As part of testing Sound Transit's Safety and Security SSIMS database, Talson noted that CIs were generally referenced adequately to the Preliminary Hazard Analysis (PHA) and traceable to SSIMS. The audit did note **one (1) Recommendation** relating to select Sound Transit documents not yet updated to include FWLE reference. Subsequent to the Audit Closeout Briefing, discussions were facilitated with Sound Transit's Senior System Safety and Security Specialist to note audit results and any potential corrective actions that can be taken by Sound Transit to remedy recommendations.

The FWLE project reached substantial completion and commenced operation and revenue service in early December 2025. Standard Operating Procedures (SOPs), Standard Management Procedures (SMPs), manuals, risk mitigation against the PHA, and other requirements have been adequately prepared, tested for compliance, and are in alignment with Agency Safety and Security protocols and objectives for revenue operations. Fire/Life/Safety, and Emergency Management Procedures, as well as appropriate responses to the Threat Vulnerability Analysis (TVA) have also been established.

The SSCVR was authorized by Sound Transit's Chief Executive Officer on October 28, 2025. The WSDOT State Safety Oversight concurrence for readiness and use for the riding public was issued November 20, 2025. Endorsement for Completion of the Safety and Security Certification Audit Process for the FWLE Capital Project was jointly issued by Sound Transit Internal Audit and Talson on December 6, 2025.



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II. SCOPE AND METHODOLOGY

SSCAs provide assurance that identified hazards are effectively mitigated and appropriately documented during each phase of a capital project spanning from preliminary engineering to revenue service. The APs of SSCAs are specific to the completed phases of a capital project:

Audit Profile 1000 – *Hazard Analysis*

Audit Profile 2000 – *Design*

Audit Profile 3000 – *Construction*

Audit Profile 4000 – *System Testing*

Audit Profile 5000 – *Vehicle Fabrication*

Audit Profile 6000 – *Training/SOPs*

Audit Profile 7000 – *Fire/Life Safety Readiness/*

Certification Reporting

This SSCA focused on activities related to Audit Profile Nos. 4000, 6000, and 7000 and assessed compliance to FTA’s Oversight Procedure 54 (OP54) requirements for Safety & Security, and Pre-Revenue Operation. Safety and Security CIs within the SSIMS database were selected for testing in relation to the following FWLE Contracts: Communications (COMMs), Electric, Guideway, Land, Overhead Catenary System (OCS), Parking, Signaling (SIG), Station, Stray, Structural, Traction Power Substation (TPS), Traffic, and Utilities.

At the time of Talson’s sampling, 88 CIs were marked as closed within the SSIMS database. Talson tested 17 (20%) of the 88 closed safety and security CIs for testing.

Notable documentation reviewed during the audit included:

- WSDOT SSOA Concurrence Letter for completion of safety and security certification for the Federal Way Link Extension Project, November 20, 2025
- CEO Authorization Letter for Revenue Service, October 28, 2025
- FWLE Safety and Security Certification Verification Report (SSCVR), October 24, 2025
- FWLE Systems Integrated Test Plan Volume 2, September 18, 2025
- FWLE Operational Conformance Letter, June 27, 2025
- Sound Transit Agency Safety and Security Certification Plan, April 2023
- Sound Transit Agency Safety and Security Management Plan, Rev. 3, December 2022
- Sound Transit Emergency Management Plan, September 2022
- FWLE, Preliminary Hazard Analysis, September 3, 2018
- FWLE Project Specific Safety and Security Certification Plan, April 2017

A full list of documents reviewed by Talson for this audit can be found in [Appendix A](#).



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Audit Approach

- Conducted a kick off meeting with applicable personnel on September 17, 2025
- Assessed relevant compliance documentation including prior audit reports, SSCP, SSMP, and the FWLE-specific PHA, dated September 3, 2018
- Interviewed Operational and Emergency Management personnel onsite
- Conducted onsite walk-throughs of all station and garage facilities
- Reviewed various SOPs, SMPs, procedures, and training records
- Reviewed uploaded documentation and notations within each sampled CIs
- Completed Audit Profile 4000 Testing of Checklists/Workpapers
- Facilitated a Closeout Briefing of preliminary results on November 10, 2025
- Produced audit draft and final reports

Onsite Audit Activities

Talson and TRA's Audit Team conducted onsite audit activities, from November 10 through 12, related to AP 4000, AP 6000, and AP 7000. On Monday, November 10, the Audit Team, and Sound Transit's Internal Audit, met with Sound Transit's Safety and Security Team at the Union Station office to discuss the preliminary findings relating to AP 4000.

The Audit team on November 11, 2025 performed a site visit of FWLE's three stations: 1) Kent Des Moines Station/Garage, 2) Star Lake Station/Garage, and 3) Federal Way Station/Garage. See [Appendix B](#) for further details of the site audit results.

AP 4000 Results

Audit Profile 4000 – Pre-Operational Integration Testing is primarily comprised of the following audit activities:

- Assessed the application and effectiveness of performance testing as defined in System Integration Testing Plan and procedures
- Reviewed evidence that safety and security requirements have been adequately tested and appropriately documented with review and approval
- Assessed that uploaded testing documentation within SSIMS had been performed and attested to by appropriate personnel
- Reviewed key documents including the System Integration Test Plan, approved procedures, test results, and audit records

Sound Transit's SSCP, Appendix 5 - outlines the use of CI Checklist Forms within the SSIMS for uploading documented evidence that each identified hazard has been mitigated throughout each completed capital project phase. Talson's test of AP4000 included testing using stratified

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sampling. Each sampled CI was verified for relevancy, appropriateness, traceability, and proper referencing. A three-tiered rating system was used to categorize the results:

- **Acceptable:** No deviation from the implemented SSCP / SSMP standards.
- **Conditionally Acceptable:** Minor deviation of the implemented SSCP /SSMP standard and unlikely to result in a nonconforming product or service.
- **Unacceptable:** A significant breakdown or partial breakdown in processes that resulted in, or incorrectly documented, a nonconforming product or service.

Audit Profile 4000 Summary of Preliminary Audit Findings					
Contract	Total CIs	IDs Sampled	Acceptable	Unacceptable	Conditionally Acceptable
FWLE Safety	83	12	12	0	0
FWLE Security	5	5	5	0	0
TOTAL	88	17	17	0	0

CIs that are rated below “Acceptable” may or may not result in the assignment of audit findings, recommendations, and/or a corrective action plan based on the criteria listed in Section V of this report, and the professional judgement of the auditor.

AP 6000 & AP 7000 Results

Audit Profile 6000 – Operations and Maintenance Readiness is primarily comprised of the following audit activities:

- Reviewed contracted and internal training for sufficient planning and timeliness, minimize risk, mitigate system safety hazards, and vulnerability to identified security threats
- Confirmed that the Rule Book, established SOPs, and SMPs are updated or developed, as required, to support system safety certification
- Determined that relevant Safety & Security Plans and Procedures are updated, as required, to support system safety certification

Audit Profile 7000 – System Readiness, Fire/Life Safety, and Security Certification Reporting is primarily comprised of the following audit activities:

- Reviewed specific fire/life/safety items for coordination with outside agencies
- Confirmed that certificates and verification reports were completed with accuracy
- Reviewed Safety Certification Documentation: certificates issued, general certification documentation, and other certification documentation (emergency management drills)



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The Audit Team found that sampled SOPs, SMPs, manuals, risk mitigation against the PHA, and other requirements have adequately been prepared, tested for compliance and/or addressed, and are in alignment with agency Safety and Security protocols and objectives for revenue operations. The AP 6000-7000 portion of the audit resulted in one (1) recommendation relating to safety and security documentation not yet being updated to include the FWLE project.

Talson's onsite audit resulted in four (4) non-critical items observed during the onsite visit to Kent Des Moines Station/Garage, Star Lake Station/Garage, and Federal Way Station/Garage. Talson noted the following which have been shared with Sound Transit Senior System Safety and Security Specialist for future considerations:

Non-Critical Safety & Security Items

- 1) Decorative film at Kent Des Moines and Star Lake Stations prevented and obscured clear line of sight
- 2) Font on exit signs in garages was small and difficult to see
- 3) Ground directional arrows in garages were difficult to see
- 4) Not all signage work at stations has been completed (noted as a work in progress)



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III. FINDINGS

The audit resulted in **zero (0) findings**.

IV. RECOMMENDATIONS

The audit resulted in **one (1) recommendation**:

Recommendation No. 1: Key Sound Transit Safety and Security Documents updates do not include the Federal Way Link Extension. The following Sound Transit Safety and Security Related Documents have not been updated to include the Federal Way Link Extension as of the time of this report:

1. Link Light Rail Maintenance Management Plan – April 2024
2. Crisis Management Plan – December 9, 2024
3. Emergency Management Plan – September 2022
4. Emergency Call List – September 2022

V. MANAGEMENT RESPONSES FORMS

As a result of “no audit findings”, a MRF nor management corrective actions are not required. Recommendations are “suggestions for improvement” and the appropriate Sound Transit business unit has the option to correct the issue or not. Below are the definitions of a Finding and Recommendation, along with the acceptable response requirements:

- A. **Findings** indicate areas where Sound Transit or another entity is non-compliant with its own established policy, plan, procedure and/or regulation, and which must be corrected and documented (in writing) with a corrective action plan. Action plans should include a specific, measurable amount of time it will take to correct the issue and reduce risk.
- B. **Recommendations** do not mean the issue is deficient. However, the auditor has determined that the issue poses the potential risk of becoming a finding in the future, if recommended changes are not put in place to prevent re-occurrence.



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VI. DISTRIBUTION

Safety and Security Audit Dates:	September through November 2025	
Organization:	Sound Transit	(Auditee)
Responsible Party:	Andrea Trepadean, Chief Safety Officer Linneth Riley-Hall, Executive Project Director, FWLE	(Auditee)
Talson Auditor(s):	Ken Brzozowski, Yvette Suarez, Norman Jones, Liam Ryan, Rick Bumbera	(Auditors)
Report To:	Patrick Johnson, Deputy Executive Director, Audit Division	
Distribution List:	Benjamin Marx, <i>Acting</i> Executive Director, Service Delivery, Sound Transit Branden Porter, Deputy Executive Director of Safety, Sound Transit Kerry Pihlstrom, Executive Director, Asset Transition Office, Sound Transit Don Burr, Director, Transportation Safety & Security, Sound Transit Paul Fitzpatrick, Deputy Executive Director, Sound Transit Sepehr Sobhani, Deputy Executive Project Director, Sound Transit Randy Kroum, Director – Transition to Operations, Sound Transit Heather Wright, Deputy Director – Internal Audit, Sound Transit Jim Ottman, Compliance Audit Manager, Sound Transit Claude Phillips, Sr. Transportation Safety and Security Specialist, Sound Transit Bien Mai, Transportation Safety and Security Manager, Sound Transit Michael Flood, Senior Compliance Auditor, Sound Transit Molly Hughes, Public Transportation Safety Administrator (SSO), WSDOT Andrew Royer, State Safety Oversight (SSO) Program Administrator, WSDOT Ryan Sigurdson, Transportation Planning Specialist, WSDOT SSO Jennifer Morrow. Safety Oversight, WSDOT SSO	



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VII. APPENDIX A: SAFETY & SECURITY DOCUMENTS REVIEWED

The following two documents are categorized as Sensitive Security Information and were reviewed onsite at the Sound Transits offices:

Sound Transit System Security Emergency Preparedness Plan (SSEPP) Memo, dated November 28, 2025 - The updated SSEPP outlines the protocols and procedures designed to mitigate risks, respond promptly to emergencies, and safeguard the well-being of our passengers and personnel. It reflects our commitment to maintaining the highest standards of security and resilience across all aspects of our operations. Since the SSEPP is categorized as Sensitive Security Information (SSI), this memo will serve as acceptable verification documentation. The SSEPP was reviewed at the Sound Transit Office.

Threat Vulnerability Assessment (TVA) - A TVA is a systematic process used to identify, evaluate, and prioritize potential security risks to an organization's assets (people, infrastructure, information, systems, etc.). The primary goal is to provide an objective recommendation and guidance to mitigate vulnerabilities and decrease risks before a negative event occurs.

FTA Oversight Procedures 54 – Readiness for Service, dated October 2023 – Includes the review, analysis and recommended procedures that the FTA expects from the PMOC to follow when evaluating the project sponsor's readiness for service, including System Integration testing, fulfillment of safety and security certification requirements, completion of Pre-Revenue Operations, and confirmation that project sponsor has the Management Capacity and Capability to operate.

Sound Transit Link Light Rail Project System Wide Maintenance Management Plan Lynnwood to Federal Way & Lynnwood Downtown Redmond (MMP), Rev. 5., December 20, 2018 - The MMP includes a description of the rail system overall and, in particular the maintenance facilities and equipment; the maintenance program, including maintenance equipment and tools; the maintenance organization and responsibilities of maintenance personnel; a maintenance safety program; and a description of maintenance support requirements, including maintenance data collection and reporting, and material and warranty control.

FWLE Crisis Management Plan – dated December 9, 2024 – The purpose of this plan is to ensure that the FWLE project takes a systematic approach to handling an emergency and minimizing disruption in its operations. The plan uses a risk assessment to identify potential crises that could arise on the FWLE project. By anticipating potential solutions and developing proactive responses, the plan gives the FWLE team the tools needed to make decisive, credible, and professional decisions in a critical moment.



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Sound Transit Emergency Management Plan Revision 3, dated September 2022, signed December 2022 - Has been developed to define Sound Transit's commitment to implementing and administering an emergency program for all operations within Sound Transit that achieve the highest practical level of preparedness and response for our customers, employees, and members of the community impacted by Sound Transit's operations and services. It is Sound Transit's policy to work in coordination with impacted jurisdictions and agencies in which Sound Transit operates.

FWLE Emergency Management Plan – Rev. 3, dated September 2022 – The purpose of the EMP is to guide Sound Transit departments and facilities to respond in a quick and efficient manner in the event of an emergency, enabling Sound Transit to protect the life and safety of personnel, customers, and Sound Transit property; continue vital services to the public; and rapidly recover from emergency events.

Safety & Security Certification – LRV Training Program Operational Items, dated August 7, 2025 – The certification pertains to the operational conformance item for LRV Operator training on the FWLE project. Verifying that LRV Operators were trained on the following topics was identified as an operational conformance item for the following certifiable items: Correct and safe operations of LRV doors, Distraction and fatigue management, Defensive driving techniques, Hours of service, Safety awareness training, Operators trained to use bell as needed to ensure awareness, Pedestrian and bicycle safety, Grade and pedestrian crossings.

Sound Transit Agency Safety Management Plan, Rev. 4, dated September 2024 – This plan establishes accountability and responsibility at the top levels of Sound Transit, evidenced by the Board approval and CEO commitment to the Safety Management Policy statement, which includes providing necessary resources to sustain and improve the Sound Transit safety culture. This document serves as the framework for the Sound Transit SMS and maps all the processes and procedures that support it.

Federal Way Link Extension Safety and Security Management Plan, April 2017 - The SSMP for the FWLE project is to define the design-build team's safety and security activities and methods for identifying, evaluating, minimizing, and resolving potential safety hazards and security vulnerabilities of these systems. The SSMP establishes responsibility and accountability for safety and security during the final engineering, construction, testing, and start-up phases of the FWLE project.

Federal Way Link Extension Agency Safety and Security Certification Plan - Rev. 0, dated April 2017, signed April 7, 2017 - The SSCP is a comprehensive approach that establishes the process for verifying the incorporation of essential Safety and Security Requirements into projects. The SSCP is modeled after the FTA Handbook for Transit Safety and Security Certification and incorporates best practices applicable to the unique requirements of ST and its regional operations.



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Federal Way Link Extension Preliminary Hazard Analysis, dated September 3, 2018 - This report is to describe the process to identify a preliminary list of potential hazards of the FWLE Project at the 60% Design Phase, to demonstrate how they will be eliminated through design, mitigated by control measures, or deemed acceptable as-is, and to document those measures, as appropriate.

Sound Transit and Inter-Con Security Systems Public Safety and Security Services Contract, February 2023 – Security services contracts – outlines the terms and conditions of the contract with Sound Transit.

Sound Transit and Allied Universal Security Services Public Safety and Security Services Contract, February 2023 – Security services contracts – outlines the terms and conditions of the contract with Sound Transit.

Sound Transit and Pal American Public Safety and Security Services Contract, February 2023– Security services contracts – outlines the terms and conditions of the contract with Sound Transit.

Sound Transit and PPC Solutions, Inc. Public Safety and Security Services Contract, February 2023– Security services contracts – outlines the terms and conditions of the contract with Sound Transit.

Project Specific Sound Transit SMPs - This plan is project specific and establishes accountability and responsibility at the top levels of Sound Transit, evidenced by the Board approval and CEO commitment to the Safety Management Policy statement, which includes providing necessary resources to sustain and improve the Sound Transit safety culture. This document serves as the framework for the Sound Transit SMS and maps all the processes and procedures that support it.

Project Specific Sound Transit SOPs – Project specific Standard Operation Procedures – These documents detail, written instruction that outline how to perform a specific task or process routinely to ensure consistency and quality.

FWLE Safety and Security Certification SSOA Concurrence Memo, November 2025 – This document details the concurrence of Washington State Department of Transportation SSOA concurrence of completion of a safety and security certification for the Federal Way Link Extension Project.

CEO Authorization Letter for Revenue Service, dated October 28, 2025 – Letter to Molly Hughes, Public Transportation Safety Administrator Washington State Department of Transportation regarding authorization to begin revenue service operations for the Federal Way Link Extension. Chief Executive Officer, Dow Constantine, accepted the Safety and Security Certification Verification Report and authorized Sound Transit Operation to utilize Federal Way Link Extension for revenue service.

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VIII. APPENDIX B: ONSITE AUDIT ACTIVITIES

Kent Des Moines Station Garage is a 4-floor public garage is adjacent to the Kent Des Moines Station. The physical check of the garage revealed the following:

- Call boxes are located on each floor and clearly identified. The call box checked on the 1st floor was checked for worked properly.
- All trashcans were steel mesh and secured to the ground.
- All floors of the garage were clearly identified and stairwells had adequate signage.
- All floors had proper CCTV coverage.
- There were bollards protecting the entrance and exits on all floors, there were no bollards placed near the Second Floor Elevator.
- The clearance for entrance into the garage was marked 8'2", and the clearance for ascending the garage to the second floor was marked 7'2".
- Each parking spot was identified with its own number.

During the physical check of Kent Des Moines Station revealed the following:

- Proper camera coverage of the North and Southside of the Station.
- The station featured decorative "glass films" that from some angles were difficult to clearly see through.
- There was no "No Trespassing" and "Rider Conduct" signage at the station, however they were to be implemented in the days following Talson's On-site Activities.
- There are electric sign boards and steel sleep deterring benching.
- All back-of-house locations have key lock and access controls.

Star Lake Station and Garage. The physical review of the Star Lake Garage revealed the following:

- Call boxes are located on each floor and clearly identified. The call box checked on the 3rd floor worked properly.
- All trashcans were steel mesh and secured to the ground.
- All floors of the garage were clearly identified, and stairwells had adequate signage
- All floors had proper CCTV coverage.
- There were bollards protecting the entrance and exits on all floors.
- The clearance for entrance into the garage was marked 7'2".
- Each parking spot was identified with its own number.

During the physical check of Star Lake Station revealed the following:

- Proper camera coverage of the North and Southside of the Station.



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- Half of the station featured clear partitions from a Crime Prevention through Environmental Design Certification (CPTED) approach. However, the other half of the station featured partitions with a design imbedded within them that were difficult to clearly see through.
- There was no “No Trespassing” and “Rider Conduct” signage at the station, however they were to be implemented in the days following Talson’s onsite Activities.
- There are electric sign boards and steel sleep deterring benching.
- All back-of-house locations have key lock and access controls.

Federal Way Station resulted in the following:

- Proper camera coverage of the North and Southside of the Station.
- The station featured clear partitions from a Crime Prevention through Environmental Design Certification (CPTED) approach.
- There was “No Trespassing” and “Rider Conduct” signage at the station.
- There are electric sign boards and steel sleep deterring benching.

Talson identified four, non-critical observations during the physical site visit of the FWLE various stations and garages on November 11.