

2025 Agency Safety Plan Revision Summary

Section	Title	Revisions
All	All	<ul style="list-style-type: none"> Updated formatting of manual consistency, readability, and maneuverability by user Updated hyperlinks within the manual to include links to both external and internal resources referenced, as available Updated terms, abbreviations, acronyms, and title page for relevancy and accuracy Updated regular verbiage that does not change the impact or intent of statements, i.e.: clarity, succinctness, readability, comprehension, verb tense Updated tables / charts / figures as needed Updated "TLLR" references to "T Line" Updated general agency terminology following organizational changes
-----	<i>Definitions</i>	<ul style="list-style-type: none"> Updated EAMS- spelled out Enterprise Asset Management System in lieu of using the acronym in this section Removed terms: "Operations/Maintenance/Emergencies/Documentation" & "Vulnerability"
0.1	<i>ST Background > Delegation of Authority and Accountability in SMS</i>	<ul style="list-style-type: none"> Updated verbiage "...maintains a direct reporting line to the AE and..." Added verbiage "...and copy of the ASP"
0.2	<i>Scope and Purpose</i>	<ul style="list-style-type: none"> Added verbiage: Partner Agency Safety Plans must meet or exceed those noted in Sound Transit's ASP for ST-owned transit lines of service. Updated verbiage from: "...have also developed" to "...maintain"
0.4	<i>System Description</i>	<ul style="list-style-type: none"> Added verbiage "Sound Transit does not operate any service on behalf of another transit agency or entity"
1.1	<i>Regulatory Updates to the Agency Safety Plan</i>	<ul style="list-style-type: none"> Updated verbiage "Additionally, this update includes references to CFR 49 § 671 which establishes the requirement for a Rail Transit Roadway Worker Protection Program. A working group has been convened to develop this program by mid-2025 for submission and approval by December 2025." Updated verbiage regarding SOP: SSO Program Data Source and Collection. Changed verbiage to reflect ownership by the SSO from "a data sharing SOP" to "their data sharing SOP". Removed verbiage: There are references throughout this plan to the Bipartisan Infrastructure Law (BIL), passed in late 2021. The Bipartisan Infrastructure Law was introduced to address several critical needs in public transportation, and it aims to modernize and expand transit systems across the United States. Added verbiage: References throughout this plan reflect the integration of the Bipartisan Infrastructure Law (BIL) originally enacted in late 2021 into the 2024 revision of 49 CFR § 673.
1.2	<i>Safety Performance Measures & Targets</i>	<ul style="list-style-type: none"> Removed verbiage "For 2024, Sound Transit has adopted a new method for determining safety performance targets based on historical performance and trends. Recently Sound Transit has observed an increase in injury and event rates that are not aligned with historic performance. To this end, Sound Transit has evaluated both the average rate for safety targets and the average year over year change in rate." Removed verbiage "Sound Transit determines SPTs based on historical performance and trends ST evaluates both the average rate for safety targets and the average year-over-year-change in rate. By comparing the average rate and the average rate-of-change over a three-year period..."

		<ul style="list-style-type: none"> Removed verbiage "...that are reported internally to ST, and externally to WSDOT and the FTA (NTD)."
Figure 3.	<i>Safety Performance Targets</i>	<ul style="list-style-type: none"> Updated with 2025 targets
Figure 4.	<i>Risk Reduction Program – Safety Performance Targets</i>	<ul style="list-style-type: none"> Updated with 2025 targets
1.3	<i>Conformance with FTA Guidelines</i>	<ul style="list-style-type: none"> Removed verbiage "Updates in the 2024 NPTSP have added additional areas of performance measures related to a safety risk reduction program, precautionary and reactive actions to ensure public and personnel safety during emergencies, and consideration, where appropriate, of performance-based and risk-based methodologies." Added reference to ST Financial Plan and Budget Removed "the BIL" and replaced with "49 CFR § 673"
1.5	<i>Employee Safety Committee</i>	<ul style="list-style-type: none"> Added verbiage "...identify safety risk mitigations that may be ineffective and supports continuous improvement by identifying safety deficiencies. In addition, they review and approve the ASP before it is presented to the Board of Directors. More detailed information about ESC activities including discussions and recommendations can be found in the committee charter or meeting minutes which can be provided upon written request."
1.6	<i>Review and Update of ASP</i>	<ul style="list-style-type: none"> Added verbiage regarding partner ASP reviews. Verbiage "If a partner agency ASP is under revision at the time of request, an estimated publication date must be provided. To prevent delay in the ST ASP annual revision process, the previous year's partner agency plan will be reviewed and documented in the annual memo. When the updated plan has been received from the partner agency, it will be reviewed for compliance, and the memo will be updated to reflect that the review has been completed, and this memo will be shared with State Safety Oversight" Added verbiage "The annual revision process includes seeking..." Added verbiage "...major organizational changes and reassignment of functions..." Added verbiage "If changes are implemented outside of the ASP revision period a memo notifying SSO of changes made will be sent. All changes will be incorporated into the ASP in the following revision, which may be off cycle. "
1.8	<i>Emergency Management</i>	<ul style="list-style-type: none"> Updated verbiage: Sound Transit fully supports an on-going Emergency Management program as required by 49 CFR 673.11(a)(6)(i) and identified in R2017-14 Adopting a Security, Law Enforcement, and Emergency Management Policy. The Sound Transit Emergency Operations Plan (EOP) has been developed to define Sound Transit's commitment to implementing and administering a comprehensive emergency management program for all operations within Sound Transit that achieve the highest practical level of preparedness, response, and recovery for our customers, employees, and members of the community impacted by Sound Transit's operations and services. Sound Transit works in coordination with impacted jurisdictions and agencies in which Sound Transit operates. The Agency's emergency response activities are documented in a designated Emergency Operations Plan (EOP). Removed verbiage "The previous plan has been updated to conform to the requirements laid out in the BIL."
1.9	<i>Drills and Exercises</i>	<ul style="list-style-type: none"> Updated verbiage: Emergency drills and practical exercises are important tools for planning and preparing for emergency situations. Both drills and exercises provide an opportunity to implement inter-agency communication and coordination with local first responder agencies and other interested parties. Scenario-based exercises allow partners to further hone their skills, proficiencies, and procedures in preparation for an emergency or critical incident(s). Sound Transit

		meets the minimum standard for both the FTA and FRA, as well as performs additional exercises annually. A schedule of these events may be provided upon request.
1.11	<i>Certification of Compliance</i>	<ul style="list-style-type: none"> Updated verbiage: Sound Transit will certify that this Agency Safety Plan meets the requirements of 49 CFR § 673, 49 CFR § 674, and the WSDOT Program Standard. The ASP will be self-certified initially and annually thereafter through the FTA's Certification and Assurances process. In addition, Sound Transit will certify compliance with federal laws, regulations, and policies outlined in the FY2024 Certification and Assurances, as required for participation in FTA financial assistance programs.
1.12	<i>Coordination Planning with (Stakeholders) Interested Parties</i>	<ul style="list-style-type: none"> Updated section title from "Stakeholder" to "Interested Party" Updated verbiage: Sound Transit disseminates and makes available safety performance targets to the state regulatory authorities, Puget Sound Regional Council (PSRC) and other stakeholders interested parties to aid in the planning process. ST will provide a complete copy of this ASP to PSRC and WSDOT, highlighting the proposed performance targets to aid in their planning process. Future revisions will be shared with both organizations.
2.0	<i>Safety Management Policy</i>	<ul style="list-style-type: none"> Updated entire section, removed previous written "Safety Management Policy" which has now been integrated into Agency Policy 2103 (linked within section and found in Appendix 3) Added verbiage: This commitment and high-level policy objectives are established in the Safety Management Policy Statement, found in Appendix 3. The section below provides additional detail. Added Subsection 2.1 with the following verbiage: The Sound Transit Board Safety Policy (Resolution No. R2017-13) and the agency policy on safety management commits the agency to implementing a SMS that delivers high-quality services without adverse effects to the safety of passengers, employees, contractors, emergency responders, and the public and complies with applicable legal regulations, industry best practices, and other requirements. Through continuous improvement, safety culture is embedded in all activities to recognize that safety is paramount. Sound Transit's safety objectives, roles, and responsibilities are included in the Board's safety policy, as well as the agency policy. Sound Transit will proactively manage safety hazards and their associated safety risk and mitigate unacceptable risk in our transit operations to an acceptable level. This is accomplished through continuous examination of operational hazards, the application of lessons learned, and process improvement to the capital program to ensure system growth is influenced through operational experience. A non-punitive employee safety reporting program, staff training on SMS principles, and ongoing development have all been established for continuous improvement of safety performance. All levels of management and all employees are accountable for the delivery of the highest level of safety performance, starting with the Accountable Executive: Sound Transit's CEO. The Accountable Executive designates the Chief Safety Officer (CSO) as the SMS Executive. To support the SMS and facilitate timely and efficient decision-making, the CSO may directly communicate with the CEO as needed. Sound Transit will integrate the management of safety among the general responsibilities of all employees, as defined in all ST job descriptions. Additionally, the Sound Transit Employee Safety Committee plays a key role in this process. The ESC is a joint labor management committee established to identify safety risk reduction programs, set targets to improve safety performance, and review and suggest risk-based mitigations strategies. As required by the Federal Transit Administration, Sound Transit establishes annual safety performance targets to help measure the

		<p>safety of our transit system. In addition to our overall safety objective, ST continues to track and trend leading and lagging indicators to ensure the success of the system, identify opportunities for improvement, and actively track and follow-up on voluntary hazard identification reports.</p> <ul style="list-style-type: none"> • The following objectives have been established to assist ST in achieving its safety initiatives. <ul style="list-style-type: none"> • Establish safety policies, procedures and requirements to integrate safety into ST's decision-making and operations. • Assign responsibility related to safety policies, procedures, and requirements. • Establish documented standards and procedures for safety training and performance. • Investigate accidents, incidents, occurrences, and injuries. • Identify, analyze, track and resolve hazards in a timely manner. • Complying with federal and state safety related requirements, rules, and standards. • Continuously improving the safety performance through data analysis, informed decision-making, and appropriate resource allocation
2.1	<i>Safety Objectives</i>	<ul style="list-style-type: none"> • Updated title of subsection • Removed word "unacceptable" regarding mitigation of risk
2.2	<i>Safety Management Policy Communication</i>	<ul style="list-style-type: none"> • New section in this revision • Verbiage added: Sound Transit's Safety Management Policy will be distributed to all personnel via internal communications. Additionally, through a ST designed biennial training, Building a Culture of Safety: Understanding Sound Transit's SMS, the Safety Management policy statement will be shared with all staff. For more information on Training and Communication, please see Section 5.0, Safety Promotion.
2.3	<i>Employee Reporting Program and Feedback</i>	<ul style="list-style-type: none"> • Updated verbiage: Tacoma (T Line) staff may employ an alternative path for modal reporting due to the size of the operating model. Employees utilize a service log to address concerns through multiple avenues, which include facilities technicians, Tacoma Line supervisors and Sound Transit safety staff. Additionally, T Line staff are aware and regularly encouraged to utilize the ESRT as needed. The T Line Safety & Security Committee (TLSSC) reviews T Line employee reporting practices monthly for monitoring and continuous improvement. These methods of reporting are all part of the hazard identification subcomponent, and the larger Safety Risk Management process documented in Section 3.0, Safety Risk Management. Reported safety concerns will follow the process documented directly above.
2.4.1	<i>Organizational Roles and Responsibilities > CSO</i>	<ul style="list-style-type: none"> • Updated verbiage to include: "...and does not serve in an operational or maintenance capacity."
2.4.1	<i>Organizational Roles and Responsibilities > Key Staff</i>	<ul style="list-style-type: none"> • Key staff include select Internal Audit personnel, and Safety and modal Operations employees who have primary responsibility for overseeing safety, specifically Safety Division operational specialists, and T Line Deputy Directors and above. Key staff members have been identified as Public Transportation Safety Certification Training Program (PTSCTP) participants and have been enrolled in the FTA's training program
2.4.2	<i>Operating Contract Relationships</i>	<ul style="list-style-type: none"> • Updated verbiage: "...with the ST Executive Director Service Operations to discuss all aspects of the LLR system."
3.0	<i>Safety Risk Management</i>	<ul style="list-style-type: none"> • Updated verbiage: In 2025, Safety technical level committee decision making processes will be standardized with the implementation of RAPID® decision making for all impactful decisions.
3.1	<i>Hazard Identification</i>	<ul style="list-style-type: none"> • Updated verbiage to include "...viewed through Power BI reporting and are available..."
3.2	<i>Safety Risk Assessment</i>	<ul style="list-style-type: none"> • Updated verbiage: "Following identification of a hazard, an assessment is performed to determine the risk rating. Risk severity and probability..."

		<ul style="list-style-type: none"> Added verbiage: “Sound Transit also maintains a risk matrix pertaining to security-related risk.” Added verbiage: “This is accomplished through technical committee meetings or risk assessment working groups.”
3.3	<i>Risk Mitigation</i>	<ul style="list-style-type: none"> Updated verbiage: “...risks are mitigated to an...” Updated verbiage: “...to reduce the impact by bringing the risk to an acceptable level through the incorporation of the principles of system safety, using fail-safe devices and principles in design, incorporating high-reliability system components, and using redundant or backup hardware and software devices.”
4.0	<i>Safety Assurance</i>	<ul style="list-style-type: none"> Added verbiage: Sound Transit complies with the State Safety Oversight Risk Based Inspection program for additional monitoring of safety performance as outlined in FTA Special Directive 22-51.
4.1.3	<i>Transit Safety Inspections and Assessments</i>	<ul style="list-style-type: none"> Changed “quarterly” to “regular”
4.1.4	<i>Transit Safety Event Investigations</i>	<ul style="list-style-type: none"> Updated subsection header from “WSDOT Investigations” to “Regulatory Investigations” Updated verbiage: In the event that FTA or WSDOT conducts an independent investigation on Link light rail – 1, 2 or T Line, ST will review the report and provide a response within 30 days with proposed corrections or adoption. Once the investigation has been closed, ST will add any corrective actions to the Corrective Action Plan log, per Section 4.1.8 – Corrective Action Plans. Added verbiage: WSDOT holds the ultimate responsibility for the sufficiency and thoroughness of all safety event investigations, whether conducted by Sound Transit or the SSOA.
4.1.5	<i>SSO Safety Event Reports and Documentation</i>	<ul style="list-style-type: none"> Changed “identify” to “recommend”
4.1.6	<i>SSO Annual Reporting</i>	<ul style="list-style-type: none"> Added verbiage “...or a designee”
4.1.7	<i>External Reporting Notification and Thresholds</i>	<ul style="list-style-type: none"> Changed verbiage from “ keeps” to “maintains” Added “...the FTA’s...”
4.1.8	<i>Corrective Action Plans</i>	<ul style="list-style-type: none"> Removed references to “ST Transportation Safety and Security Director” Updated references to: “Enterprise Safety...” Updated verbiage: “The CAP must be submitted to WSDOT for review and approval. Sound Transit Enterprise Safety staff shall develop and maintain a CAP log, which identifies all CAPs approved by WSDOT and tracks their status. This log is shared monthly with WSDOT, superseding the regulatory requirement of quarterly submissions. As CAPs are closed out, Sound Transit staff shall submit verification that corrective actions are implemented as described in the CAP, or that a proposed alternative action has been implemented. Sound Transit provides WSDOT with...” Removed verbiage “Sound Transit provides WSDOT with: <ul style="list-style-type: none"> Verification that the corrective action(s) has been implemented as described in the CAP, or that a proposed alternate action(s) has been implemented subject to oversight agency review and approval; and Periodic reports requested by the oversight agency, describing the status of each corrective action(s) not completely implemented, as described in the CAP. “
4.2.1	<i>Configuration Management and System Modification</i>	<ul style="list-style-type: none"> Updated verbiage to: “Additionally, capital program changes are managed through executive review and the Material Review Board.”
4.4	<i>Continuous Improvement</i>	<ul style="list-style-type: none"> Updated verbiage: “It consists of formal and informal activities designed to evaluate the effectiveness of the SMS. This process

		includes, but is not limited to, Internal Safety Audit and Management Review.”
4.4.2	<i>Management Review of Safety Performance</i>	<ul style="list-style-type: none"> Updated verbiage: “...and submitted to WSDOT.”
5.2.1	<i>CSO Executive Briefings</i>	<ul style="list-style-type: none"> Updated verbiage to: “CSO’s participation in Enterprise Governance functions as established by Agency Oversight and other departments.”
Appendix #1	<i>Tacoma Link Light Rail</i>	Added (updated) verbiage: “The system begins at the T Line Operations Maintenance Facility (OMF-T) at McKinley Street on East 25th Street. From the OMF-T a single-track segment proceeds from the yard lead, through Tacoma Dome Station, to 25th Street Station. From 25th Street Station it continues onto Pacific Avenue to the 21st Street switch. At South 21st Street...”
Appendix #2	<i>Organizational Structure Overview</i>	<ul style="list-style-type: none"> Updated organizational chart, current as of July 2025
Appendix #3	<i>Safety Management Policy Statement</i>	<ul style="list-style-type: none"> New appendix added to this revision Added R2017 / Agency 2103 to this appendix