

SENT VIA EMAIL

April 7<sup>th</sup>, 2025

Patrick Johnson  
Director – Audit Division  
Sound Transit

**Re: Approval of the 2025 Tacoma Link Light Rail Internal Safety Audit Final Report.**

Mr. Johnson,

WSDOT has accepted the 2025 final audit report for Tacoma Link Light Rail Internal Safety Audit (Report # 2025-01).

Audit topics covered include:

- 1) 0.0 Introduction
  - a) 0.1 ST Background
  - b) 0.2 Scope and Purpose
  - c) 0.3 Organizational Chart
  - d) 0.4 System and Description
  - e) 0.5 Expected Outcomes
- 2) 1.0 Safety Plan 673.11
  - a) 1.1 Regulatory Updates to the Agency Safety Plan
  - b) 1.2 Safety Performance Measures and Targets 673.11 (a)(3)
  - c) 1.3 Conformance with FTA Guidelines 673.11 (a)(4)
  - d) 1.4 Regulatory Oversight and Acknowledgement 673.15
  - e) 1.5 Employee Safety Committee
  - f) 1.6 Review and update of ASP 673.11(a)(5)
  - g) 1.10 Certificate of Compliance 673.13
  - h) 1.10 Coordination with Planning Stakeholders 673.15
- 3) 2.0 Safety Management Policy 673.23(a)(B)
  - a) 2.1 Safety Management Policy Communication 673.23 (c)
  - b) 2.3 Safety Accountabilities and Responsibilities 673.23(d)
  - c) 2.4 Plan Implementation
  - d) 2.5 SMS Documentation and Records 673.31
  - e) 2.6 Access to SMS Documentation and Records 673.31
- 4) 3.0 Safety Risk Management 673.25
  - a) 3.1 Hazard Identification 673.25(b)(1)(2)
  - b) 3.2 Safety Risk Assessment 673.25(c)(1)(2)
  - c) 3.3 Risk Treatment 673.25(d)
- 5) 4.0 Safety Assurance 673.27(a)
  - a) 4.1 Safety Performance Monitoring and Measurement 673.27(b)
    - b) 4.1.1 Rules Compliance and Procedure Review

- c) 4.1.2 Safety Data
- d) 4.1.7 Corrective Action Plans
- e) 4.5 Safety Culture Assessment
- 6) 5.0 Safety Promotion
  - a) 5.1 Competencies and Training
  - b) 5.1.1 Public Transportation Safety Certification Training Program

There were zero (0) findings associated to this audit.

There were zero (0) observations associated to this audit.

Sound Transit has remained on schedule to audit all Agency Safety plan elements and modal safety programs for Tacoma Link Light Rail within the current three-year audit cycle (2025-2027), as required by the Washington State Rail Safety Oversight Program Standard.

Please contact me with any questions.

Sincerely,



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Molly Hughes  
Public Transportation Safety Administrator (SSOA)  
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# Tacoma Link Light Rail Internal Safety Audit

Report #: 2025-01

## Executive Summary

Federal and state regulations for Tacoma Link light rail service, along with the WSDOT's State Safety Oversight (SSO) program standards, require annual internal safety audits. These audits are performed periodically to review the agency's safety programs and ensure that processes are working as intended and required by the Agency Safety Plan (ASP).

### Audit Objective

The objective of our audit was to evaluate safety controls, processes, and procedures in place to ensure the safe operation, maintenance, and oversight of the Tacoma Link light rail service provided by Sound Transit in its roles as service owner, operator, and maintainer.

Our audit included a comprehensive review of the processes and programs detailed in the Agency Safety Plan (ASP), following the guidelines set by the Federal Transit Administration (FTA) under the Safety Management Systems (SMS) framework as per 49 CFR Part 673.

The audit covered the period from **April 2024** to **December 2024**

### Conclusion

From our audit, we identified no **(0) findings** of non-compliance and **no (0) observations** requiring further action.

Summary of results:

Ref #	Title of Issue	Risk Rating
n/a	No issues raised	n/a

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# Background

## Federal and state requirements for Tacoma Link light rail service

In 2018, the Federal Transit Administration (FTA) published 49 CFR Part 673, requiring rail properties to develop and use transit-specific safety management system (SMS) framework through public transportation agency safety plans (ASP) for oversight of safety processes.

The 673 rule also requires agencies to maintain documentation related to the implementation of their SMS, as well documentation of any activities that arise from the development and maturity of SMS. Furthermore, rail transit agencies are obligated to review their ASPs annually to make updates, corrections, and necessary modifications to be compliant with changing federal and state requirements.

Washington State Department of Transportation’s (WSDOT) State Safety Oversight Program (SSO) oversees and monitors compliance with relevant regulations for the Tacoma Link light rail service. The SSO is also the agency that provides ongoing oversight and performs triennial audits of Sound Transit’s light rail operations.

## Tacoma Link light rail service

Sound Transit, as the owner, operator, and maintainer of the Tacoma Link light rail service, provides financial, performance, operations management, and safety oversight. The Agency Safety Plan governs light rail safety and must be reviewed and approved according to local requirements. The ASP must also be approved annually by Sound Transit’s Employee Safety Committee, Accountable Executive, the Board of Directors, and by WSDOT.

## Audit topic selection

Sound Transit’s Audit Division employed a risk-based methodology to determine the topics for auditing safety management systems. Our assessment encompassed the activities and sub-activities outlined in the ASP, and each was evaluated based on the following risk factors:

- Results from previous audits.
- Time since last audited.
- Changes in processes within 3 years.
- Safety data trends and analysis.
- Federal and state regulation updates.
- Best practice & industry guidance.

## Methods of evaluation and verification

This audit report is the second audit from our 3-year audit cycle (2024 – 2026), covering portions of elements contained in the Agency Safety Plan, as required by the WSDOT Rail Safety Oversight Program Standard.

To assess compliance during the audit, the auditors completed the following steps:

- Interviewed Safety staff to verify their understanding of safety processes.

- Interviewed operations and maintenance staff to verify their understanding of safety processes.
- Compared agency safety program-related procedures and plans against state and federal requirements.
- Sampled and reviewed documentation and records for each audit area to assess compliance.

## **Audit Standards**

We conducted our internal safety audit in accordance with the policies and procedures established by the Audit Division, governed by our Audit Charter; and meets several sets of applicable federal, state, and local auditing standards.

These standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our objectives. We believe that the evidence we obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Also, the Audit Division is committed to following safety oversight standards set forth by the Federal Transit Administration (FTA), Washington State Department of Transportation (WSDOT), and all other relevant auditing requirements or standards.

## **Audit Phases**

Each audit begins with a thorough examination of the existing processes in relation to (1) legal and regulatory requirements, (2) agency policies and procedures, and (3) industry best practices.

During the audit planning phase, we evaluate the specific conditions and risks associated with the engagement, which helps inform and confirm the objectives and scope of the audit. Relevant controls aimed at mitigating these risks are also reviewed and identified.

The audit fieldwork phase focuses on examining the design of the identified controls to ensure they align with relevant regulations and policies. If the controls are adequately designed to address the risks within the control environment, we then assess the effectiveness of these controls in mitigating the risks through control activities. Any areas where the control environment or activities fail to sufficiently reduce the identified risk are classified as exceptions.

Exceptions are categorized as either findings or observations.

- **Findings** represent the results of evaluating and verifying evidence against audit criteria, indicating non-compliance with a policy, procedure, manual, standard, or industry best practice.
- **Observations**, on the other hand, are issues that may currently comply with requirements. However, the auditor identifies them as posing a potential risk of

becoming a finding if recommended changes are not implemented to prevent future occurrences.

## Audit results

The following table summarizes of our findings and observations using the FTA's SMS framework. This final report reflects the current state of safety practices and processes at Sound Transit during the audit period.

SMS Framework	Number of findings	Number of observations
Safety Plan	0	0
Safety Policy	0	0
Safety Risk Management	0	0
Safety Assurance	0	0
Safety Promotion	0	0
<b>Totals</b>	0	0

## Audit topics reviewed

This section of the report outlines the audit areas we examined during this audit cycle, organized according to each component of the Safety Management System (SMS):

### I. Safety Plan

The Sound Transit Agency Safety Plan (ASP), effective September 27, 2024, was approved and signed by the Chief Safety Officer and the Accountable Executive represented on the Safety Policy. The Employee Safety Committee and the Board of Directors approved the ASP per agency procedures and 49 CFR 673.11.

Areas subject to review under this section include:

- Regulatory Updates to the Agency Safety Plan
- Safety Performance Measures and Targets
- Conformance with FTA Guidelines
- Regulatory Oversight and Acknowledgement
- Employee Safety Committee
- Review and update of ASP
- Certificate of Compliance
- Coordination with Planning Stakeholders

#### a. Findings:

We found no instances of non-compliance with the Agency Safety Plan.

#### b. Observations:

We found no opportunities for improvement with the Agency Safety Plan.

## **II. Safety Policy**

Sound Transit Safety Policy, signed by the Accountable Executive and included in the ASP, Sec 2.0, complies with 49 CFR 673.23.

Areas subject to review under this section include:

- Safety Management Policy Communication
- Safety Accountabilities and Responsibilities
- Plan Implementation
- SMS Documentation and Records
- Access to SMS Documentation and Records

### **a. Findings:**

We found no instances of non-compliance with the Safety Policy.

### **b. Observations:**

We found no opportunities for improvement with the Safety Policy.

## **III. Safety Risk Management**

The 2024 WSDOT SSO Triennial Audit of Sound Transit concentrated on evaluating Safety Risk Management activities. Additionally, the 2026 Compliance Audit program will incorporate a review of this audit.

## **IV. Safety Assurance**

Areas subject to review under this section include:

- Safety Performance Monitoring and Measurement
  - Rules Compliance
  - Roadway Worker Protection
- Safety Data
- Corrective Action Plans
- Safety Culture Assessment

### **a. Findings:**

We found no instances of non-compliance with Safety Assurance.

### **b. Observations:**

We found no new instances of opportunities for improvement with Safety Assurance. However, our previous issue, raised as an observation in 2023 remains open. In that

audit, we found a lack of maintenance data tracking, work is still ongoing to address the issue. We will continue to track this as an open observation that will be continuously monitored until corrected.

**V. Safety Promotion**

Areas subject to review under this section include:

- Competencies and Training
- Public Transportation Safety Certification Training Program

**a. Findings:**

We found no new instances of non-compliance with Safety Promotion. Along with the scheduled audit work, we reviewed the new Agency Safety Program, Rev 0. dated 1/21/2025 relating to CAP 42. We verified the plan meets the requirements of 49 CFR 673.29 (a) and the ST Agency Safety Plan, this item was closed on 2/19/2025.

**b. Observations:**

We found no opportunities for improvement with Safety Promotion.

**VI. Results from prior audits**

We assessed the status of the findings and observations from previous audits to evaluate the progress toward completion. During this audit, we reviewed two (2) previous internal safety audit issues, listed below.

Year	Issue Type	Issue Description	Actions Taken	Current State
2023	Finding (TL CAP 42)	Agency lacks a comprehensive Safety Training Plan.	We examined the implementation of a safety training plan and confirmed it meets all requirements for closure.	Closed (2/19/2025)
2023	Observation (Obsv. #2)	Lack of maintenance data tracked.	We found that maintenance data tracking is still ongoing, so this item remains open.	Open

# Appendices

## Appendix A: List of interviewed staff

The audit team interviewed the following individuals during their Tacoma Link light rail safety audit. Staff positions are listed titles only:

- Acting Deputy Executive Director, Safety & Quality Coordination
- Executive Operations Director, Tacoma Light Rail
- Deputy Director, Tacoma Light Rail
- Director, Construction & Employee Health & Safety
- Manager, Health and Safety
- Acting Director, Safety Culture and Programs
- Manager, Security & Safety Management System
- Manager, Transportation Safety & Security
- Senior Specialist-Safety Management System
- Senior Transportation Safety & Security Specialist
- Program Manager, Safety & Security Data
- Regulatory Reporting Specialist, Transportation Safety & Security
- Senior Program Manager, Safety Training
- Senior Technical Trainer, Tacoma Link

## Appendix B: List of documents and records reviewed

The audit team reviewed the following documents and records during the safety audit.

- Sound Transit Agency Safety Plan, 9/2024
- TSS-WI-005-ASP Annual Revision Process, 7/2/2024
- WI-004-ASP-ESC-Approval-Process, 1/26/2024
- WI-003-ASP Board Approval Process, 1/26/2024
- WI-002-ASP-Signature-Distribution-Process, 1/26/2024
- 2024 Agency Safety Plan Revision Summary
- Board Motion No. M2024-57, Annual 2024 Agency Safety Plan Approval
- Power Bi: KPI Metrics/Data
- ASP KPI Calculations 2016 thru 2024
- Safety Data Handling Manual: Ver 1.3a 7/15/2020
- Agency Safety and Security Management Plan, Rev 8, 3/11/202
- Employee Safety Committee Meeting Materials, Apr-Dec 2024
- Tacoma Link Safety & Security Committee Meeting Materials, Apr-Dec 2024
- TSS-SOP-TSS09-CAP-PROC-R2.0-2024-MAY (CAP Plan Process)
- Sound Transit 2024 Agency Safety Plan Submittal to SSO
- Hazard Management Manual, Rev 1.0, 04/2024
- SMS Implementation Roadmap (Smart Sheets)
- TSS-SOP-TSS03-NTD-MO-RPTG, R2.0, 2/202024
- Safety Culture Survey Presentation, Sep 2024
- WSDOT Concurrence Letter, ST PTASP, 10/29/2024
- FTA Correspondence, Letters/emails
- New Forms for PTSCPT Enrollment and Semi-Annual Reporting, Dec 17, 2024
- November 2024 FTA Transit Safety and Oversight Spotlight Newsletter, Nov 26, 2024
- December 26, 2024, Reporting Deadline for General Directive 24-1, Nov 21, 2024
- FTA Publishes Updates to the Public Transportation Agency Safety Plans Regulation, Apr 9, 2024
- TSS SOP-01: Agency Safety Plan review & approval process
- TLR-SMP-10002 Job Safety Briefing, Rev: 1.1, 3/9/2023
- TLR-SMP-20005-LRV Weekly Inspection, Rev: 1.0, 4/24/2023
- TLR-SMP-20007-LRV 10,000 Mile Inspection, Rev: 1.0, 4/4/2023
- TLR-SMP-30008-De-energizing and Energizing the Mainline TPSS, Rev: 2.0, 4/25/2024
- TLR-SMP-30010 Hands-On OCS Annual Inspection, Rev: 2.0, 4/26/2024
- TLR-SMP-30017 Stray Current Testing, Rev: 1.0, 4/26/2023
- TLR-SMP-40001 Blue Flag Protection, Rev: 2.0, 4/27/2023
- TLR-SMP-50005 Weekly Right of Way Preventive Maint Insp, Rev: 1.0, 5/2/2023
- TLR-SMP-60005 Personal Protective Equipment, Rev: 1.0, 5/4/2023
- TLR-SMP-60009 LOTO for Machines and Equipment, Rev: 1.0, 5/4/2023

- TLR-SMP-70002 Asset Disposal, Rev: 3.0, 5/2/2023
- TLR-SMP-70005 Inventory Adjustments, Rev: 1.0, 5/3/2023
- TLR-SMP-70009 MMIS Outage, Rev: 1.0, 5/2/2023
- TLR-SMP-70016 Tool Calibration, Rev 1.0, 5/2/2023
- TLR-SMP-80001 Accident and Incident Response, Rev: 1.0, 5/2/2023
- TLR-SOP-10005 Work-Related Injury -Illness
- TLR-SOP-10006 Radio Communication Procedure
- TLR-SOP-10007 Bulletin-General Notice
- TLR-SOP-10008 Right-of-Way Work Request
- TLR-SOP-10009 Operator Training-Re-Certification-Retraining, Rev: 3.0, 11/13/2024
- TLR-SOP-10018 Right of Way Worker Protection on the Trackway
- TLR-SOP-10020 Progressive Discipline
- TLR-SOP-20002 Flagger Duties and Responsibilities
- TLR-SOP-40002 Exiting-Entering Mainline Right of Way
- TLR-SOP-40010 Station Operation
- TLR-SOP-80004 Supervision Responsibilities
- TLR-SOP-80008 System Reporting Requirements
- TLR-SOP-80009 LRV Operator Evaluation Process
- TLR-RB-10001 Tacoma Rule Book, Rev: 14.0, 06/17/2023
- Quarterly Performance Eval Sign Off, 20% of employees, Apr-Dec 2024
- Operations Quarterly Evaluations, 20% of employees, Apr-Dec 2024
- Weekly Ride Check Sign Off, 20% of employees, Apr-Dec 2024
- Weekly Rules and Procedure Observations, 20% of employees, Apr-Dec 2024
- Bulletins (in Effect/Rescinded), 100% of 4 reviewed, CY2024
  - B01-24, B02-24, B03-24, B05-24
- General Notices (in Effect/Rescinded) 100% of 2, CY2024
  - GN2024-01, GM2024-02
- Job Safety Briefings, Sampled 20% of 267, Apr-Dec 2024
- Right-of-Way Training, ST University
- Employee Training Records, Sampled 15% of 60 employees

## Sound Transit's Title VI notice of rights

Sound Transit conducts Title VI equity analyses for service and fare decisions to ensure they are made as equitably as possible.

More information on Sound Transit's Title VI notice of rights and the procedures to file a complaint may be obtained by:

- Phone: 888-889-6368; TTY Relay 711;
- Email: [stdiscriminationcomplaint@soundtransit.org](mailto:stdiscriminationcomplaint@soundtransit.org);
- Mailing to Sound Transit, Attn: Customer Service, 401 S. Jackson St. Seattle, Washington 98104-2826; or
- Visiting our offices located at 401 S. Jackson St. Seattle, Washington 98104.

A complaint may be filed directly with the Federal Transit Administration Office of Civil Rights, Attention: Complaint Team, East Building, 5th Floor – TCR, 1200 New Jersey Avenue, SE, Washington, DC 20590 or call 888-446-4511.

### Report Prepared by:

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Javier Perez, Sr. Compliance Auditor (Lead Auditor)

### Reviewed (QA/QC) by:

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Heather Wright, Deputy Director, Audit Division

### Approved for release by:

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Patrick Johnson, Chief Audit Officer, Audit Division