PMOC REPORT

OP 22 – Safety and Security Management Plan Review

Honolulu High-Capacity Transit Corridor Project
City and County of Honolulu
Honolulu, HI

October 2011 (FINAL)

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1.0 EXECUTIVE SUMMARY

This Safety and Security Management Plan (SSMP) Review, is undertaken in accordance with FTA's Operating Procedure (OP) 22, with the primary objective of determining whether the Honolulu High-Capacity Transit Corridor Project (HHCTC) SSMP Revision 2.0 dated June 1, 2011, meets the requirements of FTA Circular C 5800.1, dated August 1, 2007, sufficiently to permit project entry into Final Design (FD). A secondary objective is to identify areas within the SSMP that, while adequate in content, require revision for clarity, consistency, or correction of errors or omissions, and to provide the PMOC opinion on content that, while compliant with requirements, raises concern with the execution of the plan.

As detailed in Section 2.0 of this report, the PMOC reviewed two drafts of the SSMP before receiving the final Revision 2.0, dated June 1, 2011. The first draft, dated April 1, 2010, resulted in a detailed PMOC comments provided to the City and County of Honolulu ("grantee") on a Comment Matrix, dated April 23, 2010. The second draft, dated January 14, 2011, precipitated another Comment Matrix, dated February 14, 2011. In mid-April 2011, the PMOC met with the grantee's project management and safety and security staff on-site to discuss the PMOC's February 14, 2011 comments and the latest grantee working draft SSMP that was being developed as the formal submittal for Final Design entry. This was a productive site visit culminating in joint agreement on the content and timing of the Final Design SSMP submittal.

During the site visit in April 2011, the PMOC had limited time for other activities but was able to take a driving tour of the alignment, attend a Fire/Life Safety Meeting, and discuss State Oversight Agency (SOA) progress and safety and security staffing issues. Observations from these activities may be found in Section 3.2 of this report. Details on the SOA status are provided in Appendix D.

The PMOC assessed the SSMP using criteria identified in items 1 through 12 in OP 22, which are also listed in Circular 5800.1, Pages II-4 and II-5, and against the specific section-by-section requirements identified in C5800.1 Chapter IV. Comments on each section and the SSMP appendices appear in Appendix B of this report, each followed by an indication of compliance with FTA requirements of Compliant (C), Marginally Compliant (M), or Noncompliant (N). PMOC findings are described in greater detail in Section 3.1 of this report. Additionally, the PMOC added the Compliant (C), Marginally Compliant (M), or Noncompliant (N) ratings to the SSMP review checklist provided as Appendix A in circular C.5800.1 and included it as Appendix C of this report to provide a briefer summary of section-by-section compliance.

The PMOC review found that SSMP Revision 2.0, dated June 1, 2011, is a significantly improved document over the previous submission. It contains all sections specified in FTA Circular 5800.1, with the minimum content required for FD entry either included or implied. The PMOC review also found, however, a need for revision in some plan sections and appendices for both minor (correction of typographical errors and omissions) and major reasons. One such major concern is whether the staffing plan provides sufficient safety and security technical capacity to cover all activities likely during Final Design, during which phase the Design-Build contractors are likely to begin construction, albeit limited, under LONPs. Section-by-section comments, including those pertaining to appendices, are detailed in Appendix B. Section 3.1 of this report presents 15 Findings resulting from the review, most including

summaries or, in some cases, amplifications, of the Appendix B comments. As a result of its findings, the PMOC has reached the following conclusions:

- The content of all plan sections and support appendices of the SSMP is at least marginally compliant with requirements for the Final Design entry stage of the Project.
- The content of the SSMP's identified sections and appendices, as identified in Section 3.1, Section 3.3 and Appendix B of this report and supported by commentary in Section 2.4 of this report, need revision to better clarify intent, correct typographical errors or omissions, and to address specific issues identified in the PMOC comments
- Revision must be made to SSMP Section 2.4 and Appendix A (as identified in Section 3.1, Section 3.3, and Appendix B of this report), in the SSMP submitted with the FFGA application for the PMOC to make an acceptance recommendation to the FTA for award of an FFGA.

As a result of these conclusions, the PMOC is making the following recommendations:

- The FTA should accept the grantee's SSMP Revision 2.0, dated June 1, 2011, as satisfactory for the project to enter into Final Design.
- The Construction Safety and Security Manager (CSSM) position and the Safety and Security Certification Manager (SSCM) positions are anticipated to be filled during Final Design. Because of the very early Letter of No prejudice construction work anticipated, the CSSM and SSCM positions should be filled prior to entry into Final Design.
- The grantee should make the revisions identified in Section 3.1, Section 3.3, and Appendix B of this report when revising the SSMP to address the changes required by the establishment of HART, and make that revision when sufficient information is available to do so.

2.0 PROJECT BACKGROUND/DESCRIPTION

2.1 Objectives of the SSMP Review

This Safety and Security Management Plan (SSMP) Review is undertaken in accordance with FTA's Operating Procedure (OP) 22, dated May 2010, to determine whether the Honolulu High-Capacity Transit Corridor Project (HHCTC) SSMP Revision 2.0, dated June 1, 2011, meets the requirements of FTA Circular C 5800.1, dated August 1, 2007, sufficiently to permit project entry into Final Design (FD).

A secondary objective is to identify areas within the plan that, while adequate in content, a) require revision for clarity, consistency with other elements of the plan or industry standards, b) require the correction of errors or omissions, or c) raises concern with the execution of the plan.

2.2 Project Description

The Project is an approximately-20-mile-long elevated fixed guideway rail system along Oahu's south shore between East Kapolei and Ala Moana Center. This Project is based on the Airport Alignment, which includes 21 stations. The alignment is elevated, except for a 0.5-mile at-grade portion at the Leeward Community College station.

- Guideway segments.
  - Segment I (West Oahu/Farrington Highway) – East Kapolei to Pearl Highlands (6 miles/7 stations)
  - Segment II (Kamehameha Highway) – Pearl Highlands to Aloha Stadium (4 miles/2 stations)
  - Segment III (Airport) – Aloha Stadium to Middle Street (5 miles/4 stations)
  - Segment IV (City Center) – Middle Street to Ala Moana Center (4 miles/8 stations)
- Length: 20 miles
- Number of Stations: 21
- Additional Facilities: Maintenance and Storage Facility (MSF) and parking facilities
- Vehicles: 80 vehicles
- Ridership Forecast: Weekday boardings – 97,500 (2019); 116,300 (2030).

2.3 Project Objectives and Benefits, and Current Status

2.3.1 Project Objectives and Benefits

The grantee's objective for the Project is to provide fast, reliable public transportation services to a rapidly developing area and to ease congestion in the east-west transportation corridor between Kapolei and the University of Hawaii at Manoa. The Project is also intended to provide basic mobility in areas with diverse populations. The Project supports the goals of the City and County of Honolulu's General Plan and the 2030 Oahu Regional Transportation Plan by serving areas designated for urban growth. The goals used to select the LPA during the AA included:

- Improve corridor mobility
- Encourage patterns of smart growth and economic development
- Cost effective solution;

- Feasible solution
- Minimize community and environmental impacts
- Achieve consistency with other planning efforts

The Project's goals and objectives stated in the EIS are similar to the AA goals, as listed below:

- Improve corridor mobility
- Improve corridor travel reliability
- Improve access to planned development to support grantee policy to develop a second urban center
- Improve transportation equity

This Project will contribute to moderating the growth in anticipated traffic congestion in the corridor, improve transit linkages within the corridor, and provide an alternative to private automobile usage.

2.3.2 Current Project Status

The City and County of Honolulu ("grantee") is currently in the Preliminary Engineering (PE) phase and anticipates requesting approval to enter into Final Design in October 2011.

2.4 Documents Reviewed, Interviews, and Site Visits

The PMOC initially reviewed SSMP Revision 2.0 Draft, dated April 1, 2010, and returned section-by-section comments on a Comment Matrix, dated April 23, 2010, indicating that significant revision was required to comply with FTA requirements for a Final Design SSMP submission. The PMOC next received SSMP Revision 2.0 Final Draft, dated January 14, 2011 for review, and returned comments on an additional Comment Matrix, dated February 14, 2011.

As did the earlier matrix, the February 14, 2011 SSMP Comment Matrix provided general comments applicable to the entire SSMP and specific, section-by-section comments addressing deficiencies in meeting C5800.1 requirements at the Final Design entry stage of a project. Subsequent to receiving the comments, Project staff discussed the comments in a teleconference with the PMOC. PMOC then held an April 12-14, 2011 on-site meeting to assess the grantee's working draft SSMP being developed as the formal submittal for Final Design entry.

The on-site meeting reviewed PMOC comments made on the January 14, 2011 SSMP submission and included discussions of PMOC comments on revised activity and responsibility matrices, which were sent to the grantee for informal review prior to the site meeting. The prime purpose of the joint grantee/PMOC effort was to review all comments, confirm the FTA requirements for the SSMP at the Final Design stage of the project, and reach agreement on the acceptable content of the Final Design SSMP submittal.

The grantee gave a presentation covering the existing and proposed Project safety and security organization and committee structure for Final Design and later project phases. During the course of the discussion that followed, the PMOC outlined the specific FTA requirements as

contained in Chapter IV of Circular 5800.1. These were discussed in greater detail during a section-by-section review of the grantee's responses to the PMOC February 14, 2011 comments.

Where appropriate, specific text revisions were jointly made, to satisfy both the grantee's vision for managing safety and security on the project and the FTA requirements specified in C5800.1. Discussion on the proposed safety and security organization and planned committees led to the grantee making some changes from what it presented and agreeing on what would be in the formal Final Design submission.

Also discussed was the need for some early construction coverage in the Final Design SSMP. Because the first active contract is a Design-Build (DB) contract, construction (such as utility relocations) will likely start in some areas, under LONPs, very shortly after Final Design begins. Thus, construction phase safety and security activities, which normally do not have to be detailed until the FFGA SSMP submission for a Design-Bid-Build (DBB) project, must be at least partly detailed in the Final Design submission for a DB project. This detail is needed to assure that the management of construction phase certification and construction safety and security requirements for the early work are adequately covered in the Final Design SSMP.

The grantee and the PMOC came to an agreement on how best to satisfy these requirements for each of the required SSMP sections. To assure that the SSMP would be formally submitted, reviewed by the PMOC, and sent to the FTA in a timely manner with regard to the Final Design Roadmap, the following timetable was agreed upon:

- The grantee would revise the SSMP and submit it to the FTA/PMOC as the formal submittal for entry into Final Design as early as possible in the week of May 9, 2011.
- IEI would review the submitted plan and prepare the Draft OP22 Review Report and forward it to Jacobs no later than May 18, 2011.
- The PMOC would send the Final Draft OP22 Review Report, with recommendation as to acceptability of the SSMP for entry into Final Design, to the FTA by May 31, 2011.

Subsequent to the site visit, the grantee sent draft activity matrices and organization charts for PMOC review and comment in late April and early May, and the PMOC responded with comments on May 2 and May 9, 2011. The timetable established at the April 2011 meetings was not met, with the PMOC receiving the SSMP Revision 2.0, dated June 1, 2011 on May 31, 2011, as the Final Design entry submission.

2.4.1 Documents Reviewed

The PMOC reviewed the following grantee documents for this report:

- Safety and Security Management Plan, Revision 2.0, June 1, 2011
- Safety and Security Certification Plan, Revision 1.0, June 1, 2010
- Construction Safety and Security Plan, April 2011
- Safety and Security Management Plan, Revision 2.0 Final Draft, January 14, 2011
- Safety and Security Management Plan, Revision 2.0 Draft, April 1, 2010
- Safety and Security Certification Plan, Revision 0 Draft, February 19, 2010

2.4.2 Persons Interviewed

The PMOC performed TCC interviews and assessments of additional project staff hired since the PE Entry Readiness Report in order to better assess the grantee's readiness to enter Final Design. The PMOC previously interviewed Kahlil Allen the Safety and Security Manager from the Project Management Consultant (PMC), who provided adequate answers to all the questions provided in the sample interview protocol in OP 22 Appendix E. The list of possible interviewees recommended in OP 22 Appendix D were performed during the TCC interviews and assessments mentioned above. Additional PMOC information, recommendations and professional opinions are available in "OP 21 Technical Capacity and Capability Report," which was submitted to FTA in June 2011.

No interviews were required during the SSMP meetings held during the April 12-14, 2011 site visit since the PMOC had conducted them during the TCC assessment. Additional interviews will be performed after approval to enter Final Design is granted by the FTA and the Honolulu Authority for Rapid Transportation (HART) is established on July 1, 2011.The PMOC will also perform an SSMP Adherence Review sixty to ninety days after approval to enter Final Design. The PMOC did not perform an SSMP Adherence Review previously, since the Project was assigned to Jacobs after approval to enter PE was already issued by the FTA on October 16, 2009. The PMOC did not receive a Final Draft of the SSMP from the grantee until January 14, 2011. However, the PMOC has been monitoring the grantee's SSMP implementation during the PE phase for compliance with FTA guidelines.

The PMOC did, however, hold discussions related to safety and security and State Oversight with the Rapid Transit Division Safety and Security Manager (RTD SSM), the RTD Deputy Project Officer for Engineering and Construction (DPO DEC), and the Hawaii Department of Transportation (HDOT) Deputy Director who is temporarily assigned to fulfill the responsibilities of the SOA until a permanent position is filled.

In addition, PMOC personnel attended a regularly scheduled Fire/Life Safety Working Group (FLSWG) meeting. The discussions and meetings provided insight into the planned organizational elements and identified some areas that warrant observation as Final Design progresses.

3.0 PMOC'S FINDINGS, OBSERVATIONS AND COMMENTS

3.1 Findings

The findings below and in Appendices B and C provide a general assessment of the SSMP's quality and level of compliance to the applicable FTA requirements. The findings also provide an in-order specific assessment of how well each of the specific FTA requirements are complied with, including clear description of areas of deficiency and suggestions or recommendations for resolving deficiencies. At either the start or end of each item assessment, a letter is shown in bold type to indicate that the Item is Compliant (C) *[acceptable]*, Marginally Compliant (M) *[contains minimum content required for FD]*, or Noncompliant (N) *[not acceptable]* with FTA requirements.

1. SSMP Revision 2.0, dated June 1, 2011, is a document that is significantly improved over the previous submission. It contains all sections specified in FTA Circular 5800.1, with the minimum content required for Final Design entry either included or implied.

2. Except as noted in the Findings below on specific issues, the plan is largely in agreement with the results of the discussions held between the grantee and the PMOC during the April 2011 site meetings.

3. Of the 42 comments in Appendix B, 25 (Comments 4, 5, 6, 7, 10, 15, 17, 18, 19, 20, 21, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 41, and 42) are identified as compliant (C) with no code entry in the Apply column. This indicates that they are fully acceptable as written for Final Design entry and no revision will be required before the FFGA submission unless changes resulting from HART or changed project conditions make it necessary.

4. One comment (Comment 39) in Appendix B, on the Appendix D Organization Chart of Safety and Security Committees and Working Groups, is identified as compliant (C) with a code entry of FFGA in the apply column. This indicates that the organization shown is fully acceptable for Final Design entry, but the comments regarding expanding the chart to show all committees and working groups needed for the testing and start up phases of the project should be addressed when revising the plan due to the establishment of HART. If it is not revised at that time, it must be revised for the FFGA SSMP submission.

5. Nine comments (Comments 8, 11, 12, 13, 14, 16, 22, 23, and 40) in Appendix B are identified as Compliant (C) with the code entry HART in the Apply column. The sections or appendices commented on are acceptable for entry into Final Design, but some typos or omissions require correction in five of these sections (8, 14, 16, 22, and 23). More substantial changes are needed in the remaining four sections (11, 12, 13, and 40), which are discussed in individual Findings, below.

6. Seven comments (Comments 1, 2, 3, 9, 36, 37, and 38) in Appendix B are identified as Marginal (M), five (1, 2, 3, 37, and 38) with the code entry HART in the Apply column, and two (9 and 36) with the entry FFGA in the Apply column. The sections or

appendices commented on are acceptable for entry into Final Design, but the comments made should be addressed when revising the plan due to the HART takeover. The two identified with the code, FFGA, if not addressed in the HART revision, must be addressed in the FFGA SSMP submission for the PMOC to be able to recommend FTA acceptance for award of a FFGA.

7. As indicated in Comment 9 in Appendix B, the content of SSMP Section 2.2 does not fully address the requirements specified in C 5800.1 Chapter IV Section 2b. It does not identify procedures and resources that will support performance of safety and security activities throughout the project phases, nor does it provide the required project budget and schedule for safety and security activities. The "level of effort" chart provided in Appendix A (discussed in Comment 36 and referenced in Subsection 2.2.2), only shows full time equivalents (FTEs) without cost information or relation to the activities identified in Subsection 2.1. There is no schedule provided for those activities. As written, SSMP Section 2.2 is marginally compliant and meets the minimum requirements of Circular 5800.1 for entry into Final Design. *The grantee should begin a priority effort to develop a budget and a schedule for the activities described in SSMP Section 2.1 and include both in an expanded Appendix A in the SSMP revision that incorporates the necessary changes due to the creation of HART. The revisions should also include appropriate expansion of SSMP Section 2.2 to identify procedures and resources that will support performance of safety and security activities throughout the project phases. If not done then, the needed revisions must be in the FFGA SSMP submission or the PMOC will not be able to recommend FTA acceptance.*

8. As indicated in Comment 1 in Appendix B, the signature page that appears immediately following the cover page includes signatures from the RTD General Manager, RTD Safety and Security Manager and the RTD Chief Project Officer. The only required signature in the SSMP is the Policy Statement signed by the General Manager. *If the other signatures are required by the grantee as part of its controlled document policy, it should be retained with the original SSMP in internal records, but not be included in any SSMP submitted to the FTA.*

9. As indicated in Comment 2 in Appendix B, the Revision Record, currently on page ii, is missing a column to show the initials of the manager authorized to approve the revision. This column may have been omitted because of the inclusion of the signature page discussed in Finding 8, but the Revision Record should stand on its own and identify who approved the revision. *An approval column should be added to the Revision Record in the next revision of the SSMP.*

10. As indicated in Comment 3 in Appendix B, the Acronym List on pages vii and viii is missing acronyms that appear in the SSMP. It is good practice to review the completed document to assure that all acronyms used in the plan are included in the Acronym List. Accepted practice is to fully write out what the acronym designates and follow that with the acronym in parentheses the first time it is used in the document and to include it on the acronym list if it appears a second time in the document by itself. The purpose of the acronym list is to avoid forcing a reader who comes upon an acronym in the document to

leaf through page by page to find its meaning. *In the next revision, the acronym list should be expanded to include all acronyms used in the SSMP.*

11. As indicated in Comment 37 in Appendix B, the content of SSMP Appendix B is marginally compliant and meets the minimum requirements of Circular 5800.1 for entry into Final Design. The Combined Project Organization Chart is needed to support the content of SSMP Section 2.3 and should be up-to-date (dated reasonably close to the SSMP Revision Date). The included Organization Chart is dated 12/15/10, nearly six months earlier than the date of the SSMP. Also, the use of color to distinguish between RTD/PMC and EMC positions is not helpful on black and white copies. Identification means other than color should be used on all charts and exhibits in the SSMP. *In the next SSMP revision, Appendix B should include an up-to-date organization chart that can be read on non-color copies.*

12. As indicated in Comment 38, and discussed in part c) of Comment 11 in Appendix B, the inclusion of an HPD staff member in the organization's command chain, as shown on the Organization Chart in Appendix C, is inappropriate. It is acceptable for an HPD staffer to serve as a technical resource for security, serve on committees, or in an advisory capacity, but not to have organizational authority unless formally seconded to the transit agency. The advisory role appears to be indicated by the note on Appendix C that dotted lines show only "Lines of Coordination and Review." This appears to be contradicted, however, by the note that when the HART organization is formed, the System Security Specialist title will be changed to Deputy Director of Security, clearly a title indicating a level of direct supervision. Also, the chart shows the line between the RTD GM and the SOA Program Manager as solid, indicating the GM supervises this SOA position, which is not the case. *In the next SSMP revision, the organization chart in Appendix C should be revised to clearly indicate that the roles of the HPD and SOA staff personnel are consultative, advisory, or for coordination, and not managerial.*

13. As indicated in Comment 11 in Appendix B, the content of SSMP Section 3.1 complies with the requirements of C 5800.1 and is acceptable for entry in Final Design, but there are specific content issues in several subsections that should be addressed in the next revision of the SSMP. These are described in paragraphs a) through f) in Comment 11, and summarized below.

    a. Subsection 3.1.3 describes the responsibilities of the grantee's Safety and Security Certification Manager (SSCM). The text in the subsection indicates that the SSCM position will be filled at some unspecified time during Final Design. Ideally, this position should be filled before entry into Final Design, but if that is not possible, it should be filled early in Final Design. As discussed earlier in this report, because construction work under LONPs will be occurring early in Final Design, both design and construction certification activities will need oversight and the grantee's Safety and Security Manager cannot be expected to take on those duties as well as his or her own. *Since it directly impacts on issues related to technical capacity, the SSCM position should be filled as soon as possible, preferably before start of Final Design.*

b. Subsection 3.1.4 describes the responsibilities of the grantee's System Safety Engineers. The current title for the SSE positions, is given as System Safety Engineer, but, as described in the SSMP, their responsibilities include both safety and security.

c. Subsection 3.1.5 describes the responsibilities of the grantee System Security Specialist. As described earlier in this report, the assignment of an employee of another agency (HPD) in a position that will be elevated to Deputy Director of Security is problematic unless the employee is formally seconded to the agency in which he/she is titled. This situation raises a number of conflict of interest, continuity, and experiential issues as described in Comment 11 in Appendix B. *Repeating a comment made earlier in this report, unless the HPD System Security Specialist is seconded to the grantee's own organization, with no reporting to the* HPD, his/her role should be limited to technical resource and advisor.

d. Subsection 3.1.6 describes the responsibilities of the grantee's Construction Safety and Security Manager (CSSM) position. As with the SSCM position discussed in a), above, the CSSM position is expected to be filled during Final Design. *Because of the very early LONP construction work anticipated, the CSSM position, similar to that of the SSCM, should be filled as soon as possible, preferably before start of Final Design.*

e. Subsection 3.1.15 describes the responsibilities of Project Contractor SSCMs and CSSMs. They are each indicated as being "active members" of grantee safety and security committees and working groups. Also, as indicated in Comment 40 in Appendix B, the committee membership matrix in Appendix E shows these positions as active committee members. It is inappropriate for contractor personnel to be active members of committees responsible for overseeing their performance. *In SSMP Section 3.1.15 and in Appendix E, Contractor SSCMs and CSSMs should be identified as either "required participants" or "resources" to the committees, but not as active members.*

f. Subsection 3.1.17 describes the Core Systems Contractor (CSC) responsibilities during the Operations and Maintenance Phase. Once HDOT approves a segment for operation, the SSMP will only apply to resolution of any SSCVR identified work-arounds or operating restrictions. *Once revenue operations begin on a segment, the HDOT-approved SSPP and SSP, not the SSMP, will govern safety and security requirements. Subsection 3.1.17 should be revised to make that clear.*

14. As indicated in Comment 12 in Appendix B, the content of SSMP Section 3.2 complies with the requirements of C 5800.1 and is acceptable for entry in Final Design, but there are specific content issues in several subsections that the next revision of the SSMP should address. These are described in Comment 12, Paragraphs a) through c), and are summarized below.

a. Subsection 3.2.3 describes the responsibilities of the Fire/Life Safety Working Group (FLSWG). In describing FLSWG responsibilities, seven bulleted responsibilities are listed, three of which (bullets three through five) reference only safety when safety and security are intended. *Security should be added to these items in Subsection 3.2.3 similar to the following: In the third bulleted item add "and security related" after "safety-related." In the fourth bullet, the description should be revised to read, "Identifying, analyzing, and resolving or mitigating hazards and vulnerabilities associated with fire/life safety issues. In the fifth bullet, the description should be revised to read, "Supporting safety analyses and security assessments of identified fire/life safety hazards and vulnerabilities."*

b. Subsection 3.2.5 describes the responsibilities of the Operational Readiness Working Group (ORWG). The subsection text indicates that during Final Design, the grantee SSM will "determine the appropriate timeline for establishing the ORWG." Similar to the discussion Comment 11 in Appendix B and Finding 13, above, the accelerated nature of the first project segment could result in testing and start-up of that segment beginning very soon after the awarding of a FFGA. *To perform the needed planning and oversight of procedure development, the ORWG should be established at least 6 months, but preferably 9 months, before the planned start of testing on the first segment. This should be reflected in the next revision of the SSMP.*

c. Subsection 3.2.6 describes the responsibilities of the Rail Activation Committee. The standard acronym, RAC, for Rail Activation Committee is not provided in the section title or anywhere else in the plan, and it should be to be consistent with usage throughout the SSMP. *The parenthetical acronym, "(RAC)," should be added after the title of Subsection 3.1.6 and "Rail Activation Committee" should be replaced with "RAC" throughout the text to be consistent with other acronym usage in the plan.*

15. As indicated in Comment 13 in Appendix B, the content of SSMP Section 3.3 complies with the requirements of C 5800.1 Chapter IV and is acceptable for entry in Final Design. There are, nevertheless, some issues with responsibility assignments in Figure 3-1, Safety and Security Responsibility Matrix. During various phases of Activities 6, 7, 8, 9, 10, 11, 14, and 16, the Project Contractor SSCM is shown as the responsible entity and is either shown as overseen by the GEC-SSM and the SSRC, or directly by the SSRC. The PC-SSCMs have contractual responsibility to perform safety and security activities, as described in SSMP Section 3.1, but, as also described in SSMP Section 3.1, the GEC-SSM is contractually responsible for overseeing the PC-SSCM activities while the SSRC oversees the GEC-SSM. Required specific Activity by Activity corrections are detailed in Comment 13, but can be summarized as: *In all phases in Activities 6, 7, 8, 9, 10, 11, 14, and 16 in the Matrix in Figure 3-1 where "PC-SSCM" appears, it should be deleted, and the entry in those cells revised to read "SSRC*" over "GEC-SSM."*

3.2 Analysis, Opinions, Recommendations

3.2.1 State Oversight Agency (SOA)

Details on the SOA status are provided in Appendix D. The SOA is the entity, other than the rail transit agency, designated by a State to implement 49 CFR Part 659. The State of Hawaii has designated the Hawaii Department of Transportation (HOA) as the SOA. The ninth section of the SSMP describes activities the grantee will perform to coordinate with its SOA throughout the project development process. The State Safety Program Standards (SSPS) is unrelated to an SSMP review; the SSMP was reviewed against the requirements of C5800.1 by the PMOC and was found acceptable.

The SOA is not expected to participate in the development of the SSMP but may participate in activities/committees listed within the SSMP and described in this PMOC Report. As indicated in Appendix D, the SOA is aware of the requirement that it develop State Safety Program Standards (SSPS). Although these have not yet been developed, they are not required for an SSMP review, which requires only that the grantee be measured against the requirements of C5800.1, for which the PMOC found the grantee's activities and documentation to be acceptable.

3.2.2 Organization and Staffing

During organization and staffing discussions with the grantee's SSM, the PMOC expressed concern that four positions in SSM's organization - Safety and Security Certification Manager (SSCM), Construction Safety and Security Manager (CSSM), and two System Safety Engineers (SSEs) -- were unfilled and were not expected to be filled until the Project entered into Final Design. Because of the accelerated nature of the first awarded DB contract, some designs were being progressed during PE and may be finalized very quickly once into Final Design; some construction will likely begin under LONPs. This means that at least two members of the proposed staff (SSCM and one SSE) should be hired by the time Final Design is awarded, and the other two proposed staff members (CSSM and SSE) should be hired as soon as possible after award.

This SSMP indicates that this approach was only partly taken. The grantee is still in the process of recruiting for the two SSE positions with the goal of having them active before Final Design, but recruiting for the SSCM or CSSM has not yet begun. Text in the SSMP indicates that the SSCM and CSSM positions will be "filled during Final Design." In the PMOC's opinion, this would have been acceptable had the first contract been a DBB; since it is a DB contract, however, that is too late and a cause for concern over technical capacity issues in the management of safety and security. *The PMOC holds the opinion that recruitment for all four safety and security positions should be accelerated in order to fill the positions as soon as possible with PMC consultant personnel. This is necessary to assure adequate capacity to begin oversight of design and construction immediately after Final Design begins.*

The PMOC also urged the grantee SSM to identify the two SSEs as Safety and Security Engineers, rather than System Safety Engineers, since they have responsibility for security as well as safety, and responsibilities for construction safety as well as system safety. *The PMOC suggests that when the HART organization is formed, the job description for those SSE positions*

should specify that those individuals retained should have the knowledge and experience required to fulfill both safety and security or should be assured of the availability of competent assistance in the relevant security areas.

As discussed in the Section 3.0 of this report and Appendix B comments, the PMOC is concerned with the placement of a Honolulu Police Department (HPD) employee in the organizational command structure as the grantee's System Security Specialist. Currently shown on the SSMP Revision 2 Organization Chart with dotted line relationships to grantee personnel, indicating advisory role only, the SSMP identifies the System Security Specialist as having direct responsibility for oversight of security certification, as well as other functions. In addition, the SSMP indicates that the title is to be changed to Director of Security when the HART agency is formed, which appears to be a clear indication of direct management responsibility. *The PMOC holds the opinion that unless the HPD System Security Specialist reports directly to the grantee, with no reporting to the HPD, his/her role should be limited to technical resource and advisor.*

3.2.3 Fire/Life Safety Working Group

The Fire/Life Safety Working Group meeting was held at the City's Department of Emergency Management Control Center and was chaired by the grantee's SSM. Members included representatives from the Department of Emergency Management (DEM), Honolulu Police Department (HPD), Honolulu Fire Department (HFD), the General Engineering Consultant (GEC), and the grantee. This was the first meeting of the newly formed FLSWG, as a subcommittee of the Safety and Security Review Committee (SSRC).

Previously, the Safety and Security Oversight Review Committee (SSORC) had the current FLSWG functions as well as all other safety and security related functions. As a result, a large portion of the SSORC membership often sat through meeting segments in which they had no involvement. To increase efficiency and effectiveness the grantee reorganized the SSORC into a high-level Safety and Security Review Committee (SSRC), supported by three specialized subcommittees (which the grantee calls Working Groups) to address Fire/Life Safety (FLSWG), Safety and Security Certification (SSCWG), and Operational Readiness (ORWG). The FLSWG is the only subcommittee currently active. Because of the reorganization, while this was the first FLSWG meeting it dealt primarily with old business carried over from the previous SSORC meetings. The meeting closed after the grantee's SSM advised that the FLSWG would meet formally on a monthly basis.

The SSCWG will have to be active at the beginning of Final Design and the ORWG will have to be active near the end of the construction phase of the first operating segment and be in full force at the start of the testing and start-up phase of that first operating segment, anticipated by late 2014 or early 2015.

In the PMOC's opinion, the restructuring of the SSORC and creation of the FLSWG and other working groups should result in more effective use of personnel resources. *The PMOC also strongly suggests that a fixed venue and day and time for FLS meetings should be established; this is likely to result in greater attendance and preparation by participants. The venue should be at the project offices so that technical personnel dealing with specific issues can provide their input as their agenda item comes up and then return to work.*

3.3 SSMP Compliance Assessment

The review of SSMP Revision 2.0 was done as a detailed section-by-section assessment of the submission's content against the requirements for each section as detailed in Chapter IV of FTA Circular C 5800.1, dated August 1, 2007. The PMOC evaluated the content against that required at the Final Design entry stage of a project. Normally, the PMOC reviewers perform a two-step review of a resubmission. The first step determines how well the comments made on the previous revision were addressed, and the second step compares any other changes made from the previous submission against FTA requirements. In this case, because the comments on the previous revision were so extensively discussed at the April 2011 site meetings, the PMOC found it more productive to review the entire plan against FTA requirements.

PMOC comments for each required section of the SSMP, Appendices, Acronym List, and controlled document plan format appear on the Comment Matrix in Appendix B of this report. The comments appear in plan order. As required, each comment is identified by either a C, for "compliant," an M, for "marginally compliant," or an N, for "noncompliant." In addition, one of three codes (FD, HART, or FFGA) is indicated in the "Apply" column in the Matrix, with the following indications:

- FD – Must be addressed for entry into Final Design
- HART – Should be addressed when revising the SSMP to conform to HART's project organization and management requirements
- FFGA – Must be addressed in the FFGA SSMP submission

The absence of a code entry for a comment indicates that the comment acknowledges full compliance, as written, with FTA requirements for a Final Design SSMP submission. It should be noted that the FD code was not used on any of the 42 comments in Appendix B.

3.4 SSMP Adherence Assessment

The PMOC will conduct an SSMP Adherence Review following the guidance provided in OP 22 Section 6.1.3, sixty to ninety days after approval to enter FD is granted by the FTA. As indicated in Section 2.4.2 of this report, the PMOC did not perform an SSMP Adherence Review previously, since the Project was assigned to incoming PMOC (Jacobs) after approval to enter PE was already issued by the FTA on October 16, 2009. The following are initial activities that were performed during the PMOC's SSMP Review for the Final Design phase:

- Based on activities, documentation, committees, and responsibilities identified in the SSMP and on documents and materials the PMOC has been provided to review, the PMOC has performed interviews with the grantee, PMC and GEC, and has also visited the West Oahu Farrington Highway (WOFH) Design Build (DB) Guideway project, grantee and GEC offices to make sure safety and security programs are being implemented. All current safety and security materials developed by the grantee, PMC, GEC and contractors are in possession of the PMOC.

- The PMOC reviewed plans, policies, and procedures and determined they are consistent with the SSMP and with the FTA's intent for management of safety and security programs

- The PMOC reviewed documentation, including memoranda, reports, records, and minutes of safety and security related committees and verified that the program has been implemented and plans and procedures are being followed.

- The PMOC interviewed the grantee, PMC and GEC (senior and middle managers and consultant personnel identified in the SSMP and others with safety and security responsibilities in the agency and throughout the project) and verified that personnel charged with carrying out the safety and security programs are aware of the SSMP and their responsibilities and are capable of meeting them.

- The PMOC inspected the WOFH Design Build (DB) Guideway project, the grantee and GEC offices and viewed evidence that safety and security programs are being implemented throughout the project area.

The results and conclusions from the review of support documentation, interviews, and site visits indicate that the SSMP requirements and safety and security programs are adequate for the Final Design of the project as planned, documented, and implemented. Findings that support the conclusion and any recommendations for improving or resolving program deficiencies are presented in descending order of importance. Detailed support for the findings is provided in Appendix B to the Report.

3.5 Issues/Analysis

Because of the early stage of the Project, the following are the only two safety and security observations of significance to report regarding the alignment:

- The first is that the aerial alignment section east of Ho'opili Station will require provision of a new road from Farrington Highway to the alignment to provide access for emergency responders. This is necessary to comply with NFPA 130 requirements for emergency access.
- The second is an issue raised by Federal Court judges, who have expressed concern that the aerial alignment section opposite the Courthouse is at the same level with the windows of their chambers and represents an unacceptable vulnerability by increasing their security risk. The grantee has conducted a TVA and found that the alignment may actually reduce vulnerability because it blocks sight lines from buildings across from the Courthouse. This issue may not be resolved on its technical merits, as some physical work may be necessary to satisfy the judges' perceptions.

As the Project advances, additional safety and security issues relating to alignment access, stations, and automatic train operation will arise and the PMOC will discuss those of significance with the grantee and address them in its reporting to the FTA.

4.0 CONCLUSIONS AND RECOMMENDATIONS

The PMOC review described in this report assessed how well the grantee SSMP Revision 2.0, dated June 1, 2011 meets the requirements detailed in FTA Circular C 5800.1 for acceptability for entry into Final Design. As a result of this assessment, the PMOC reached the following conclusions and recommendations.

4.1 Conclusions

- The content of all plan sections and support appendices of the SSMP is at least marginally compliant with requirements for the Final Design entry stage of the Project.

- The content of identified sections and appendices (as identified in Section 3.1, Section 3.3, and Appendix B of this report and supported by commentary in Section 2.4 of this report) need revision to better clarify intent, correct typographical errors or omissions, or address specific issues identified in the PMOC comments.

- Revision must be made to SSMP Section 2.4 and Appendix A (as identified in Section 3.1, Section 3.3, and Appendix B of this report), in the SSMP submitted with the FFGA application for the PMOC to make an acceptance recommendation to the FTA.

4.2 Recommendations

As a result of these conclusions, the PMOC is making the following recommendations:

- The FTA should accept SSMP Revision 2.0, dated June 1, 2011, as satisfactory for the project to enter into Final Design.

- The Construction Safety and Security Manager (CSSM) position and the Safety and Security Certification Manager (SSCM) positions are anticipated to be filled during Final Design. Because of the very early Letter of No Prejudice (LONP) construction work anticipated, the CSSM and SSCM positions should be filled prior to entry into Final Design.

- The grantee should make the revisions identified in Section 3.1, Section 3.3, and Appendix B of this report when revising the SSMP to address the changes required by the establishment of HART, and make this revision when sufficient information is available to do so.

APPENDICES

Appendix A: Acronym List

C	Compliant
CEL	Certifiable Elements List
CIL	Certifiable Items List
CPTED	Crime Prevention Through Environmental Design
DB	Design-Build
DBB	Design-Bid-Build
DBOM	Design-Build-Operate-Maintain
EPP	Emergency Preparedness Plan
FD	Final Design
FFGA	Full Funding Grant Agreement
FLSC	Fire/Life Safety Committee
FTA	Federal Transit Administration
HA	Hazard Analysis
HART	Honolulu Authority for Rapid Transportation
HDOT	Hawaii Department of Transportation
HFD	Honolulu Fire Department
HHCTC	Honolulu High-Capacity Transit Corridor Project
IEI	Interactive Elements Incorporated
LNOP	Letter of No Prejudice
LPA	Locally Preferred Alternative
M	Marginally Compliant
N	Non-compliant
NFPA	National Fire Protection Association
PE	Preliminary Engineering
PHA	Preliminary Hazard Analysis
PM	Project Manager
PMOC	Project Management Oversight Consultant
PMP	Project Management Plan
PRO(P)	Pre-Revenue Operation (Plan)
RTD	Rail Transportation Division (of the City and County of Honolulu)
SIT(P)	System Integration Testing (Plan)
SOA	State Oversight Agency
SSCP	Safety and Security Certification Plan
SSCVR	Safety and Security Certification Verification Report
SSSM	System Safety and Security Manager
SSMP	Safety and Security Management Plan
SSP	System Security Plan
SSPP	System Safety Program Plan
SSRC	Safety and Security Review Committee
RAC	Rail Activation Committee
RAM	Rail Activation Manager
RAP	Rail Activation Plan
TVA	Threat and Vulnerability Analysis

Appendix B: SSMP Revision 2.0 Comment Matrix

Rating Key: (C) Compliant *[acceptable]*, (M) Marginal *[contains minimal content required for FD]*, or (N) *[not acceptable]* Noncompliant for a FD Level SSMP

Apply Key: FD – must be addressed for entry into FD.
HART - should be addressed when revising the SSMP to conform to HART's project organization and management requirements
FFGA – must be addressed in the FFGA SSMP submission.

No.	SSMP Page No.	SSMP Section No.	Rating	PMOC Comment/Recommendation	Apply
1	i	Signature page	M	This page should be deleted; the only required signature is the Policy Statement signed by the General Manager. If required by the agency as part of its controlled document policy, this page should be retained with the original SSMP in its internal records, but should not be included in the document submitted to FTA.	HART
2	ii	Document Revision Record	M	Include a fourth column on the Document Revision Record to indicate approval of the revision.	HART
3	vii	Acronym List	M	Review the Acronym List against the report text and tables and add missing acronyms, similar to these found by the PMOC: DEC Design, Engineering & Construction DPO Deputy Project Officer RAM Rail Activation Manager	HART
4	1-1	1.1	C	The content of Section 1.1 complies with the requirements of C 5800.1 Chapter IV Section 1a and is acceptable as written for entry in FD.	-
5	1-2	1.2	C	The content of Section 1.2 complies with the requirements of C 5800.1 Chapter IV Section 1b and is acceptable as written for entry in FD.	-
6	1-2	1.3	C	The content of Section 1.3 complies with the requirements of C 5800.1 Chapter IV Section 1c and is acceptable as written for entry in FD.	-
7	1-3, 1-4	1.4	C	The content of Section 1.4 complies with the requirements of C 5800.1 Chapter IV Section 1d and is acceptable as written for entry in FD.	-
8	2-1 to 2-6	2.1	C	The content of Section 2.1 complies with the requirements of C 5800.1 Chapter IV Section 2a and is acceptable for entry in FD. There is an omission in the title of Subsection 2.1.5 that should be corrected in the next revision of the SSMP. The title of Subsection 2.1.5 on page 2-2 should read as, "Perform Safety and Security Analyses and Track Hazards and Vulnerabilities to Closure."	HART

No.	SSMP Page No.	SSMP Section No.	Rating	PMOC Comment/Recommendation	Apply
9	2-7, 2-8	2.2	M	The content of Section 2.2 does not fully address the requirements specified in C 5800.1 Chapter IV Section 2b. It does not identify procedures and resources that will support performance of safety and security activities throughout the project phases, nor does it provide the required project budget and schedule for safety and security activities. A "level of effort" is provided in Appendix A, which is referenced in Subsection 2.2.2, but only in FTEs, without cost information, or relation to the activities identified in Subsection 2.1. There is no schedule provided for those activities. As written, Section 2.2 is marginally acceptable for entry into FD and should be revised when the SSMP is revised due to the formation of HART. If not then, it must be revised for the FFGA SSMP submission or the PMOC will not be able to recommend FTA acceptance.	FFGA
10	2-8 to 2-10	2.3	C	The content of Section 2.3 complies with the requirements of C 5800.1 Chapter IV Section 2c and is acceptable as written for entry in FD.	-
11	3-1 to 3-11	3.1	C	The content of Section 3.1 complies with the requirements of C 5800.1 Chapter IV Section 3a and is acceptable for entry in FD. There are specific content issues in several subsections that should be addressed in the next revision of the SSMP, as identified below by Subsection: a) 3.1.3 (page 3-3) – The text indicates that the SSCM position "will be filled during FD." Ideally, this position should be filled before entry into FD, but if that is not possible, as early as possible in FD. Since it is expected construction work under LONPs will be occurring early in FD, both design and construction certification activities will need oversight and the RTD SSM cannot be expected to take on those duties as well as his own. Since this directly impacts on issues related to technical capacity, the timing of filling this position must be carefully considered. b) 3.1.4 (page 3-3) – The current title for the SSE positions is given as System Safety Engineer but as they should, and as described in the SSMP, responsibilities include both safety and security. When the HART organization is finalized, the SSE position should include safety and security job descriptions and detailed requirements for proficiency in both disciplines to assure that selected incumbents can perform all necessary safety and security functions.	HART

No.	SSMP Page No.	SSMP Section No.	Rating	PMOC Comment/Recommendation	Apply
11 Cont.	3-1 to 3-11	3.1	C	c) 3.1.5 (page 3-4, 5) - The assignment of an employee of another agency (HPD) in a deputy director's position is problematic unless the employee is formally seconded to the agency in which he/she is titled. There are conflict of interest issues and also continuity issues. For example, the transit agency may not agree with HPD's assessment of particular issues, or the HPD incumbent may be transferred to another police position without knowledge or consent of the transit agency. During a site visit the PMOC learned that the original HPD staff member assigned to the project has already been transferred and replaced; indicative of the issue the PMOC is concerned about. A related issue is that since rapid transit is new to Honolulu, it is unlikely the HPD person assigned will have any transit-specific experience to bring to this position. This relationship must be re-assessed; at a minimum it requires a more formal memorandum of understanding or other type of formalization, including participation by the transit agency in the selection of the incumbent to fill the position. d) 3.1.6 (page 3-5) – Similar to a), above, the CSSM position is described as planned to be filled "during FD." Because of the very early LNOP construction work anticipated, this position should be filled as soon as possible, preferably before start of FD. e) 3.1.15 (page 3-9) – The project contractor SSCMs and CSSMs are each indicated as being an "active member" of RTD safety and security committees and working groups. They should be identified as either "required participants" or "resources." They should not be "members" of committees of groups that oversee them. f) 3.1.17 (page 3-10) – The description of operating responsibilities should be revised to indicate that those safety and security requirements will be defined in the HDOT-approved SSPP and SSP. Once HDOT approves a segment for operation, the SSMP will only apply to resolution of any SSCVR identified work-arounds or operating restrictions.	HART

No.	SSMP Page No.	SSMP Section No.	Rating	PMOC Comment/Recommendation	Apply
12	3-11 to 3-15	3.2	C	The content of Section 3.1 complies with the requirements of C 5800.1 Chapter IV Section 3b and is acceptable for entry in FD. There are, however, some issues that should be addressed in the next revision of the SSMP: a) Subsection 3.2.3 – In describing FLSWG responsibilities, only the second bulleted item properly references both safety and security. In the third bulleted item, add "and security related" after "safety-related." In the fourth bullet, the description should be revised to read similar to, "Supporting safety analyses and security assessments of identified fire/life safety hazards and vulnerabilities." b) Subsection 3.2.5 (page 3-14) – Similar to the comments in 11a) and 11d), above, the accelerated nature of the first project segment could result in testing and start-up of that segment beginning very soon after the awarding of a FFGA. To perform the needed planning and oversight of procedure development, the ORWG should be established at least 6 months, but preferably 9 months, before the planned start of testing on the first segment. This should be reflected in the next revision of the SSMP. c) Subsection 3.2.6 (page 3-14) – add the parenthetical acronym, "(RAC)," after the title and replace "Rail Activation Committee" with "RAC" throughout the text to be consistent with other acronym usage in the plan.	HART

No.	SSMP Page No.	SSMP Section No.	Rating	PMOC Comment/Recommendation	Apply
13	3-15, 3-16	3.3	C	The content of Section 3.3 complies with the requirements of C 5800.1 Chapter IV Section 3c and is acceptable for entry in FD. There are some issues with responsibility assignments in the Figure 3-1 Safety and Security Responsibility Matrix (page 3-16) that should be addressed in the next revision of the SSMP: a) Activities 6 and 7 – Delete PC-SSCM from three phases in 6 and one in 7. The GEC-SSM is correctly shown as being responsible for overseeing the activities for RTD, with the SSRC shown providing RTD oversight. The PC-SSCMs have contractual responsibility to perform activities, but they are a level down and their responsibilities described in Section 3.1, which they are, but they should not be included in the matrix. b) Activities 8 and 9 – Delete PC-SSCM from three phases in 8 and one in 9 and replace title in each case with GEC-SSM, for the reasons described in a), above. c) Activity 10 - Delete PC-SSCM from one phase for the reasons described in a), above. d) Activity 11 – Delete PD-SSCM from the FD phase and change to GEC-SSM in the Construction phase. e) Activities 14 and 16 – Delete PC-SSCM from two phases in 14 and one in 16 and replace it in each case with GEC-SSM, for the reasons described in a), above.	HART
14	4-1, 4-3	4.1	C	The content of Section 4.1 complies with the requirements of C 5800.1 Chapter IV Section 4a and is acceptable for entry in FD. There is a typographical error that should be corrected: add the word, “of,” between “overview” and “the” in the last line of Section 4.1 on page 4-1.	HART
15	4-3 to 4-5	4.2	C	The content of Section 4.2 complies with the requirements of C 5800.1 Chapter IV Section 4b and is acceptable as written for entry in FD.	-
16	5-1	5.1	C	The content of Section 5.1 complies with the requirements of C 5800.1 Chapter IV Section 5a and is acceptable for entry in FD. There are typographical errors that should be corrected: on page 5-1, change the word, “phase” to “phases” in the second line of Section 5.1, and change the word, “is,” to “are” in the eighth line.	HART
17	5-2	5.2	C	The content of Section 5.2 complies with the requirements of C 5800.1 Chapter IV Section 5c and is acceptable as written for entry in FD.	-
18	5-2, 5-3	5.3	C	The content of Section 5.3 complies with the requirements of C 5800.1 Chapter IV Section 5b and is acceptable as written for entry in FD.	-
19	6-1	6.1	C	The content of Section 6.1 complies with the requirements of C 5800.1 Chapter IV Section 6a and is acceptable as written for entry in FD.	-

No.	SSMP Page No.	SSMP Section No.	Rating	PMOC Comment/Recommendation	Apply
20	6-1, 6-2	6.2	C	The content of Section 6.2 complies with the requirements of C 5800.1 Chapter IV Section 6b and is acceptable as written for entry in FD.	-
21	6-2	6.3	C	The content of Section 6.3 complies with the requirements of C 5800.1 Chapter IV Section 6c and is acceptable as written for entry in FD.	-
22	6-2, 6-3	6.4	C	The content of Section 6.4 complies with the requirements of C 5800.1 Chapter IV Section 6c and is acceptable for entry in FD. There are typographical errors that should be corrected: a) Seventh line of the first paragraph in Section 6.4 on page 6-2 – the word, "integrated," should be corrected to "integration." b) Top of Page 6-3 in all three bulleted items – the phrase, "emergency exercise or drill", should be corrected to read "tabletop exercise or emergency drill."	HART
23	6-3	6.5	C	The content of Section 6.5 complies with the requirements of C 5800.1 Chapter IV Section 6e and is acceptable for entry in FD. An addition should be made to the last line of the section. End the sentence with "or local police" after the word, "personnel." This is particularly important because if the operating plan remains use of driverless trains, it is likely there may not be transit system employees immediately available to receive these reports. This should also be amplified at later phases of the project as policing/security configurations are more fully addressed and when decisions have been made as to placement of emergency notification telephones, or other alerting devices for public use.	HART
24	7-1	7.1	C	The content of Section 7.1 complies with the requirements of C 5800.1 Chapter IV Section 7a and is acceptable as written for entry in FD.	-
25	7-1	7.2	C	The content of Section 7.2 complies with the requirements of C 5800.1 Chapter IV Section 7b and is acceptable as written for entry in FD.	-
26	7-2	7.3	C	The content of Section 7.3 complies with the requirements of C 5800.1 Chapter IV Section 7c and is acceptable as written for entry in FD.	-
27	7-3	7.4	C	The content of Section 7.4 complies with the requirements of C 5800.1 Chapter IV Section 7d and is acceptable as written for entry in FD.	-
28	7-3	7.5	C	The content of Section 7.5 complies with the requirements of C 5800.1 Chapter IV Section 7e and is acceptable as written for entry in FD.	-
29	7-4	7.6	C	The content of Section 7.6 complies with the requirements of C 5800.1 Chapter IV Section 7f and is acceptable as written for entry in FD.	-
30	8-1	8.1	C	The content of Section 8.1 complies with the requirements of C 5800.1 Chapter IV Section 8a and is acceptable as written for entry in FD.	-
31	8-1	8.2	C	The content of Section 8.2 complies with the requirements of C 5800.1 Chapter IV Section 8b and is acceptable as written for entry in FD.	-

No.	SSMP Page No.	SSMP Section No.	Rating	PMOC Comment/Recommendation	Apply
32	8-2	8.3	C	The content of Section 8.3 complies with the requirements of C 5800.1 Chapter IV Section 8c and is acceptable as written for entry in FD.	-
33	9-1	9	C	The content of Section 9 complies with the requirements of C 5800.1 Chapter IV Section 9 and is acceptable as written for entry in FD.	-
34	10-1	10	C	The content of Section 10 complies with the requirements of C 5800.1 Chapter IV Section 10 and is acceptable as written for entry in FD.	-
35	11-1	11	C	The content of Section 11 complies with the requirements of C 5800.1 Chapter IV Section 11 and is acceptable as written for entry in FD.	-
36	A-1	Appendix A	M	As discussed in Comment 9, above, the table showing "Estimated Level of Effort" in Appendix A does not satisfy FTA requirements for a budget for the activities identified in Section 2.1 and the required schedule is missing. The FTE estimate by phase provides a partial surrogate for a budget, deeming it marginally acceptable to allow for a recommendation to enter FD. Once the HART organization is established, the SSMP should be revised to address all identified issues in this report, including revising Appendix A to include both a budget for the safety and security activities and a schedule for those activities. A fully compliant budget and schedule must be in the FFGA SSMP for an approval recommendation.	FFGA
37	B-1	Appendix B	M	The content of Appendix B is marginally acceptable for entry in FD. The Combined Project Organization Chart of SSMP Section 2.3 should be up-to-date (dated reasonably close to the SSMP Revision Date). The included Organization Chart is dated 12/15/10, nearly six months earlier than the date of the SSMP. Also, the use of color makes it impossible to distinguish between RTD/PMC and EMC positions on black and white copies. Identification means other than color should be used on all charts and exhibits in the SSMP. In the next SSMP revision, Appendix B should include an up-to-date organizational chart that can be read on non-color copies.	HART

No.	SSMP Page No.	SSMP Section No.	Rating	PMOC Comment/Recommendation	Apply
38	C-1	Appendix C	M	As indicated in Comment 11c, above, the inclusion of an HPD staff member in the organization's command chain is not appropriate. It is fine for an HPD staffer to serve as a technical resource for security, serve on committees, and in an advisory capacity, but not to have organizational authority unless formally seconded to the transit agency. This appears to be indicated as the case by the note on Appendix C that dotted lines indicate only "Lines of Coordination and Review," but this appears to be contradicted by the double asterisk note that when the HART organization is formed the System Security Specialist title will be changed to Director of Security, clearly a title indicating a level of direct supervision. Also, the line between the RTD GM and the SOA Program Manager is solid, indicating the GM supervises this SOA Position, which is not the case. In the next SSMP revision the roles of the HPD and SOA staffers should be clarified.	HART
39	D-1	Appendix D	C	The content of Appendix D is acceptable for entry in FD. It should be expanded in the SSMP revision to address the new HART organization, to include all committees and working groups that will support the Testing and Start-up phase of the project, and must show them in the FFGA SSMP submission.	FFGA
40	E-1, E-2	Appendix E	C	The content of Appendix E is acceptable for entry in FD. For the reasons given in Comment 11e), above, it should be revised in the SSMP revision to address the new HART organization to show the contractor SSCM as a "Resource," rather than a Member, of the SSCWG.	HART
41	F-1, F-2	Appendix F	C	The content of Appendix F is acceptable as written for entry in FD.	-
42	G-1, G-2	Appendix G	C	The content of Appendix G is acceptable as written for entry in FD.	-

Appendix C - SSMP CHECKLIST

SSMP Sections			New Fixed Guideways and Extensions		
No.	**Item**	**Plan Requirements**	**SSMP (FD Request)**	**SSMP (Construction)**	**PMOC Rating***
Section 1: Management Commitment and Philosophy					
1.1	Safety and Security Policy Statement	• A *Safety and Security Policy Statement* is developed for the Safety and Security Management Plan (SSMP). • The policy statement endorses the SSMP and confirms the project's commitment to safety and security throughout all project development phases. • The policy statement is signed by the recipient's executive leadership.	Policy Statement developed for the SSMP.	Provide updates as necessary	C
1.2	Purpose of SSMP	• The SSMP implements the *Safety and Security Policy Statement*. • The SSMP identifies the recipient's management structure and activities to be performed to integrate safety and security into all phases of the project development process.	SSMP implements a Safety and Security Policy Statement and identifies a management structure and activities to be performed to integrate safety and security during the FD and Construction phase of the project.	Provide updates as necessary	C
1.3	Applicability and Scope	• The SSMP applies to all project development activities through preliminary engineering, final design, construction, integrated testing, demonstration, and the initiation of operations. • Depending on the nature of the project, this scope may encompass the following: o System-wide Elements, o Fixed Facilities, o Safety, Security, System Assurance, Operational, and Maintenance Plans and Procedures, and o Personnel Qualifications, Training and Drills/Exercises. • As applicable, the SSMP also includes activities to ensure compliance with requirements specified by the State Safety Oversight (SSO) Agency (49 CFR part 659) and/or the Federal Railroad Administration (FRA), and/or the Department of Homeland Security.	Scope includes project elements and coordination elements	Provide updates as necessary	C

SSMP Sections			New Fixed Guideways and Extensions		
No.	**Item**	**Plan Requirements**	**SSMP (FD Request)**	**SSMP (Construction)**	**PMOC Rating***
1.4	SSMP Goal	• Ensures that the final project initiated into revenue service is safe and secure for passengers, employees, public safety personnel, and the general public through a formal program of safety and security certification. • Describes how the recipient 's executive leadership has designated personnel and committees with the responsibility: o to establish safety and security requirements for the project; o to ensure that the design, acquisition, construction, fabrication, installation, and testing of all critical elements of the project will be evaluated for conformance with the established safety and security requirements; o to verify operational readiness; and o to ensure that a mechanism is provided to follow to completion the resolution of any restrictions to full safety and security certification.	SSMP Goals developed for SSMP	Provide updates as necessary	C
Section 2: Integration of Safety and Security into Project Development					
2.1	Safety and Security Activities	• Identifies the specific safety and security tasks that must be performed for the project through all phases. • Includes both a text description of the activities and a matrix listing these activities and the project phases during which they will be performed. o One matrix may be prepared that combines safety and security activities by project phase, or separate matrices may be developed.	Text description or listing is updated and supplemented with preliminary matrix of tasks—focusing on FD and related issues for Construction	Provide updates as necessary	C
2.2	Procedures and Resources	• Identifies the procedures and resources that will support performance of safety and security activities throughout the project phases. • Includes procedures for the management of sensitive security information (SSI).	References developed procedures or items-to-be-developed, references to safety and security budget and schedule or appropriate section of the project's Master Integrated Schedule	Provide updates as necessary	M

SSMP Sections			New Fixed Guideways and Extensions		
No.	**Item**	**Plan Requirements**	**SSMP (FD Request)**	**SSMP (Construction)**	**PMOC Rating***
2.3	Interface with Management	• Identifies the process and lines of communication by which safety and security issues will be communicated to senior management and used by senior management in decision-making. • An organization chart showing the recipient's project management team and key points of interface regarding safety and security issues must also be provided. • The organization chart shall identify the relationships from the safety and security staff and organizations to construction management, project management, and executive management.	Description of organization established to ensure project's accountability for safety and security issues during design; description of anticipated process for managing these issues during later phases; reference to organization chart from PMP	Provide updates as necessary	C
Section 3: Assignment of Safety and Security Responsibilities					
3.1	Responsibility and Authority	• Identifies, by title and department, all staff, contractors, and committees assigned to manage the safety and security activities specified in Section 2 of the SSMP. o Each individual staff member must be identified by title and affiliation. o Each committee must be identified by name and acronym, with membership provided by title and affiliation. o For each authority delegated to a contractor, the recipient individual or committee responsible for oversight must be shown. o An organization chart must be provided.	Description of personnel, contractors, and committees established to manage safety and security during FD—references to existing or to-be-developed documentation is made; organization chart is provided for safety and security function during FD	Provide updates as necessary	C
3.2	Committee Structure	• Describes the organization and responsibilities of the different safety and security committees , including o Safety and Security Review Committee; o Fire/Life Safety Committee; o Safety and Security Change Review Board; o Safety and Security Operations Review Committee; and o Other comparable committees.	Committees have been activated during PE and additional committees will be activated during FD and their organization and responsibilities are included in the SSMP	Provide updates as necessary	C

SSMP Sections			New Fixed Guideways and Extensions		
No.	**Item**	**Plan Requirements**	**SSMP (FD Request)**	**SSMP (Construction)**	**PMOC Rating***
3.3	Safety and Security Responsibilities Matrix	• Presents the responsibility and reporting relationships for safety and security in the form of a matrix. o Separate matrices may be used for safety and security authorities and responsibilities, or a single matrix may be used. o People having authority for safety or security functions who are not part of the recipient staff must report to a member of that staff who is responsible for that safety or security function.	Matrix has been developed to include all activities to be performed during FD (at a minimum), with responsibility clearly defined	Provide updates as necessary	C
Section 4: Safety and Security Analysis					
4.1	Approach to Safety and Security Analysis	• Describes the recipient's approach to the analysis of safety hazards and security vulnerabilities. • Known hazards and vulnerabilities must be: o Identified and categorized for their potential severity and probability of occurrence, o analyzed for potential impact, and o resolved by design, engineered features, warning devices, procedures and training, or other methods.	Describes or references the approach to be taken by the project to address safety and security analysis during FD	Provide updates as necessary	C
4.2	Requirements for Safety and Security Analysis	• Specifies the distinct types of safety and security analyses to be performed during the specific phases of the project. • Describes the mechanism for communicating analysis results throughout the project team. • Describes the process for assuring the resolution of identified hazards and vulnerabilities.	Identifies or references the specific safety and security analyses to be performed during FD—references are made to plans, procedures, contracts, etc., explains who will perform these analyses and when, and how results will be addressed.	Provide updates as necessary	C

SSMP Sections			New Fixed Guideways and Extensions		
No.	**Item**	**Plan Requirements**	**SSMP (FD Request)**	**SSMP (Construction)**	**PMOC Rating***
Section 5: Development of Safety And Security Design Criteria					
5.1	Approach to Development of Safety and Security Design Criteria	• Describes the project's approach to creating suitable safety and security design criteria. • Identifies the resources, including standards prepared by such organizations as the American Public Transportation Association (APTA), the National Fire Protection Association (NFPA), Underwriters Laboratories (UL), and others that the recipient will use to develop safety and security requirements. • Explains how the recipient will identify safety and security certifiable elements and how identification of these elements will guide the development of safety and security design criteria. • Ensures that the final specifications and contract documents for the project will result in design that meets the recipient's requirements for safety and security and addresses the certifiable elements.	Describes or references the process through which safety and security requirements identified for the project and how it will be addressed in design criteria and in project technical specifications and contract documents prepared in FD	Outlines steps to assure criteria are adhered to	C
5.2	Design Reviews	• Identifies how safety and security activities will be addressed during design reviews to ensure incorporation of safety and security requirements into the final project design.	Describes or references how safety and security issues will be addressed during FD design reviews	Outlines steps to assure reviews are undertaken and incorporated into construction activities	C
5.3	Deviations and Changes	• Identifies procedures for ensuring that changes to safety and security design criteria are appropriately reviewed and approved prior to adoption.	Describes or references how changes affecting safety and security design will be managed during FD	Provide updates as necessary	C

SSMP Sections			New Fixed Guideways and Extensions		
No.	**Item**	**Plan Requirements**	**SSMP (FD Request)**	**SSMP (Construction)**	**PMOC Rating***
Section 6: Process for Ensuring Qualified Operations and Maintenance Personnel					
6.1	Operations and Maintenance Personnel Requirements	• Identifies the number of personnel and their specific job classifications required to operate and maintain the project in revenue service. • Specifies the qualifications and core competencies, required by job classification, for these personnel to ensure their abilities to provide safe and secure service and to respond to emergencies. • Emphasizes special needs of front-line personnel (i.e., operators, supervisors, station attendants, and mechanics).	Provide more detail regarding the project's approach to identifying operations and maintenance personnel requirements during FD, including references to activities to be performed to ensure that the design effectively addresses and specifies (as appropriate) personnel requirements and needs	Provide updates as necessary	C
6.2	Plans, Rules, and Procedures	• Identifies by name the specific safety, security and emergency plans, rules, procedures, and manuals to be developed for operations and maintenance personnel, and also provides a schedule for their development.	Describes or references the materials and schedule developed by the project to address the required plans, rules, and procedures	Provide updates as necessary	C
6.3	Training Program	• Lists the elements of training to be provided to employees, by job classification, to ensure their capabilities to provide safe and secure service and to respond effectively to emergencies. • Provides a schedule for the development and offering of this training, and for completion of any qualifications or certifications required by employees. • Ensures the availability of documented evidence of personnel training and qualifications/certifications.	Describes or references the project's approach to identifying, specifying, and contracting for training and qualification programs	Provide updates as necessary	C

SSMP Sections			New Fixed Guideways and Extensions		
No.	**Item**	**Plan Requirements**	**SSMP (FD Request)**	**SSMP (Construction)**	**PMOC Rating***
6.4	Emergency Preparedness	• Identifies any exercises, drills, tabletops, or other activities that will be performed to ensure the readiness of the project placed in revenue service to respond to emergencies, and how the results of these activities will be assessed (i.e., after action report or equivalent document).	Describes or references the project's approach to ensuring the performance of emergency drills and exercises	Provide updates as necessary	C
6.5	Public Awareness	• Identifies programs that support a commitment to on-going comprehensive public awareness, for both security awareness (such as the Transit Watch "eyes and ears" program) and emergency preparedness (such as emergency evacuation instructions to riders).	Describes or references the project's approach to ensuring public awareness activities	Provide updates as necessary	C
Section 7: Safety and Security Verification Process					
7.1	Design Criteria Verification Process	• Describes the process used by the recipient to verify that safety and security design criteria have been addressed in project specifications and contract requirements, and that all required inspections and tests have been incorporated into project test plans.	Describes or references the project's approach to verifying that safety and security requirements have been addressed during FD, including completion and delivery of completed and signed safety and security design criteria conformance checklists	Provide updates as necessary	C

SSMP Sections			New Fixed Guideways and Extensions		
No.	**Item**	**Plan Requirements**	**SSMP (FD Request)**	**SSMP (Construction)**	**PMOC Rating***
7.2	Construction Specification Conformance Process	• Describes the process used to ensure that elements of the system provided under construction, procurement, and installation contracts conform to the specifications.	Describes or references the project's approach to ensure that that elements provided under construction, procurement, and installation contracts conform to the design and contract specifications	Provide updates as necessary	C
7.3	Testing/Inspection Verification	• Describes the process used to ensure that the as-built (or delivered) configuration contains the safety and security related requirements identified in the specifications and other contract documents. Includes recipient programs for contractual testing, systems integration testing, and pre-revenue operations testing.	Describes or references the project's approach to addressing safety and security issues during testing/acceptance activities	Provide updates as necessary	C
7.4	Hazard and Vulnerability Resolution Verification	• Describes the process used to ensure that safety and security design criteria and safety and security analysis have effectively identified, categorized, and resolved hazard and vulnerabilities to a level acceptable by management.	Describes or references the project's approach to verifying that the results of safety and security analysis are included in the final elements delivered for the project	Provide updates as necessary	C
7.5	Operational Readiness Verification	• Describes the process used to ensure that rules and procedures are developed to effectively incorporate all safety and security requirements specified during design and identified through safety and security analysis. This includes the process to ensure that the project has provided training to personnel and is using qualified and capable operations and maintenance personnel to initiate revenue service.	Describes or references the project's approach to verifying the readiness of systems and personnel for operations	Provide updates as necessary	C

SSMP Sections			New Fixed Guideways and Extensions		
No.	**Item**	**Plan Requirements**	**SSMP (FD Request)**	**SSMP (Construction)**	**PMOC Rating***
7.6	Safety and Security Certification Requirements	• Describes the requirements that must be met to deliver final certification that the project is safe and secure for passengers, employees, public safety personnel, and the general public, including individual certificates issued for specific elements to be verified.	Describes or references the project's planned approach for ensuring a formal and complete safety and security certification	Provide updates as necessary	C
Section 8: Construction Safety and Security					
8.1	Construction safety and Security Program Elements	• Describes the requirements to be implemented by contractors and the reports to be received by the recipient's management for implementing and tracking construction safety and security programs and plans.	Describes or references the project's approach to ensuring that bid documents address construction safety and security issues—reference applicable section of PMP or other documents as appropriate	Provide updates as necessary	C
8.2	Construction Phase Hazard and Vulnerability Analysis	• Describes the analyses that must be done to identify and resolve or mitigate hazards or threats and vulnerabilities that may be unique to the construction phase.	Describes or references the project's approach to ensuring that final bid documents address construction safety and security requirements, and that the project will have an organization in place to oversee construction safety and security	Provide updates as necessary	C

SSMP Sections			New Fixed Guideways and Extensions		
No.	**Item**	**Plan Requirements**	**SSMP (FD Request)**	**SSMP (Construction)**	**PMOC Rating***
8.3	Safety and Security Incentives	• Describes any incentives that may be in place to support implementation of the construction safety and security program.	Describes or references the project's approach to safety and security incentives	Provide updates as necessary	C
Section 9: Requirements for 49 CFR part 659, Rail Fixed Guideway Systems; State Safety Oversight					
9.1	Activities	• Identifies the activities that must be performed by the recipient to comply with State oversight agency requirements implementing 49 CFR Part 659. • If the State oversight agency has authorities that exceed 49 CFR part 659 minimum requirements, this section must also explain the recipient's approach for addressing these additional authorities.	Identifies whether project funds will be used to stand-up SSO agency; provides description of project's approach to performing required activities	Provide updates as necessary	C
9.2	Implementation Schedule	• Provides an implementation schedule regarding the performance of activities required to meet SSO agency requirements.	Update draft schedule for ensuring SSO program is up-and-running with project completion and clarifies involvement of SSO agency in project	Provide updates as necessary	C

SSMP Sections			New Fixed Guideways and Extensions		
No.	**Item**	**Plan Requirements**	**SSMP (FD Request)**	**SSMP (Construction)**	**PMOC Rating***
9.3	Coordination Process	• Describes the processes to be used to communicate and coordinate with the State oversight agency. • Identifies by title and name the recipient's primary point of contact working with the State oversight agency.	Identifies point of contact for working with SSO agency designated	Provide updates as necessary	C
Section 10: Federal Railroad Administration (FRA) Coordination					
10.1	Activities	• Identifies the activities to be performed by recipient's with projects that propose to share track with one or more FRA-regulated railroads or that will operate on, connect to, or share a corridor with, the general railroad system. • Identifies whether the recipient will be requesting waivers from FRA regulations or will be complying with them. o Each FRA regulation must be identified and the recipient's activity regarding that regulation must be specified.	N/A	N/A	N/A
10.2	Implementation Schedule	• Provides a schedule regarding the recipient's activities to comply with FRA regulations or to meet requirements for FRA waivers.	N/A	N/A	N/A
10.3	Coordination Process	• Describes the processes to be used to communicate and coordinate with FRA. • Identifies by title and name the recipient's primary point of contact working with FRA.	N/A	N/A	N/A
Section 11: Department of Homeland Security (DHS) Coordination					
11.1	Activities	• Identifies the activities to be performed by recipients to meet requirements and programs managed by DHS agencies, including the applicable Security Directives issued by TSA.	Describes project's approach to ensuring that DHS/TSA regulations are addressed in detailed design and bid documents and security analysis	Provide updates as necessary	C

SSMP Sections			New Fixed Guideways and Extensions		
No.	**Item**	**Plan Requirements**	**SSMP (FD Request)**	**SSMP (Construction)**	**PMOC Rating***
11.2	Implementation Schedule	• Provides a schedule regarding the recipient's activities to comply with DHS requirements and programs.	Developed or references schedule to ensure incorporation of DHS/TSA regulations or requirements into detailed design and bid documents and project O&M plans	Provide updates as necessary	C
11.3	Coordination Process	• Describes the processes to be used to communicate and coordinate with DHS. • Identifies by title and name the recipient's primary point of contact working with DHS.	Identifies points of contact for working with DHS/TSA on different issues, as appropriate for the project	Provide updates as necessary	C

*Rating: (C) - Compliant; (M) - Marginal; (N) - Non-compliant; (N/A) – Not Applicable

Appendix D – State Oversight Agency Status

Beginning with the Project's PE phase, the FTA encouraged the State of Hawaii to designate an agency to provide state safety oversight during the projects PE phase on February 10, 2009. A follow up letter was transmitted by FTA on February 26, 2010 specifically to reiterate the FTA's urgent concern that the State of Hawaii had yet to designate a State Oversight Agency (SOA) for the Project. The State of Hawaii was requested to submit to the FTA within 60 days of the designation of an SOA, the following information, per the rules of 49 C.F.R. Part 659:

1) The name of the SOA that will implement the requirements of 49 C.F.R. Part 659;

2) Documentation of the SOA's authority to provide state safety oversight;

3) Contact information for the representative identified by the SOA with the responsibilities for a state safety oversight;

4) A description of the organizational and financial relationship between the SOA and the rail transit agency (to ensure that the SOA does not have a conflict of interest prescribed in 49 C.F.R. Part 659.41);

5) A schedule for the SOA's development of its State Safety Oversight Program, including the projected date of its initial submittal as required by 49 C.F.R. Part 659.39(a)

The Governor of the State of Hawaii responded to the FTA on April 14, 2010 regarding the establishment of a SOA and established Executive Order 10-05 effective on April 6, 2010, designating the State Department of Transportation (HDOT) as the State of Hawaii Rail Fixed Guideway Oversight Agency. The PMOC received a copy of the SOA's draft program schedule on December 3, 2010.

However, since a new governor took office on December 6, 2010 a new Director of Transportation for HDOT was appointed and he identified the HDOT Deputy Director as the interim SOA lead in April 2011. The draft program schedule submitted on December 3, 2010 was based on the outgoing SOA and a revised program schedule for the SOA's development of the State Safety Oversight Program, including the projected date of its initial submission to FTA is required prior to entry into FD in order for the State to satisfy the 5th item requested by the FTA in the February 26, 2010 letter. In addition, the PMOC has strongly recommended that the State of Hawaii and the grantee to finalize their Memorandum of Agreement (MOA) and include the financial relationship between the SOA and the grantee to satisfy the 4th item requested in FTA's letter.

During the PMOC visit in April 2011, the HDOT Deputy Director described HDOT's senior management organization, consisting of a Director and four Deputy Directors – one each for Capital Projects, Airport, Harbor, and Administration. As Deputy Director for Capital Projects, she has been designated as responsible for the SOA, and will be the interim SOA contact person until such time as HDOT can retain a manager to lead the rail safety and security oversight functions. HDOT is actively recruiting in-house for the permanent SOA manager and anticipates a selection in early 2012. The SOA is also preparing to advertise for a consultant to develop the

FTA-mandated State Safety Program Standards (SSPS). Among other efforts, HDOT has been contacting existing state SOAs for information on their program standards and names of potential consulting firms.

During a site visit in April 2011, the PMOC made the following recommendations to the SOA:

- The PMOC recommended that the State of Hawaii to submit a revised program schedule for the SOA's development of the State Safety Oversight Program, including the projected date of its initial submission to satisfy the requirements of FTA's letter dated February 26, 2010.
- The PMOC recommended that the State of Hawaii and the grantee to finalize the Memorandum of Agreement (MOA) and include the financial relationship between the SOA and the grantee to satisfy the requirements of FTA's letter dated February 26, 2010.
- The PMOC recommended that the State of Hawaii and the grantee to jointly develop a Roadmap for key activities required to make the SOA functional.

The PMOC will continue to monitor the recommendations stated above to ensure that the SOA is in compliance with the requirements of 49 C.F.R. Part 659.

Appendix E – PMOC Evaluation Team

Key PMOC team members assigned to this review are as follows:

PMOC Team Member	Organization / Contact Info
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