

PMOC REPORT

OP 22 – Safety and Security Management Plan Review

**Honolulu Rail Transit Project
Honolulu Authority for Rapid Transportation (HART)
City and County of Honolulu
Honolulu, HI**

September 2012 (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 Rail Transit Project (HRTTP) SSMP Revision 3.0A dated February 29, 2012, meets the requirements of FTA Circular C 5800.1, dated August 1, 2007, sufficiently to support the grantee's proposed Full Funding Grant Agreement (FFGA) application. 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.

The previous OP 22 report submitted by the PMOC in October 2011 recommended acceptance of SSMP Revision 2.0 dated June 1, 2011 for entry into Final Design (FD). The October 2011 report also identified a number of improvements that needed to be made by Honolulu Authority for Rapid Transportation (HART) to the SSMP soon after entry into FD. Draft Revision 3.0A that was submitted by HART on February 29, 2012 included many of the PMOC comments provided previously for FD. To assist in a more rapid review of the draft SSMP Revision 3.0A, the PMOC provided comments to HART on March 30, 2012. HART provided responses to the PMOC Comment Matrix on May 9, 2012 indicating acceptance of 68 or the PMOC's 72 comments, including all substantive comments. Details on the SSMP review may be found in Sections 2.0 and 3.0 of this report.

During the site visit from May 1-3, 2012, the PMOC also performed an SSMP Adherence Review which was conducted in accordance with the requirements specified in OP 22 Section 6.1.3. The SSMP Adherence Review Checklist is provided in Appendix B and the SSMP Adherence Review evaluation team members are provided in Appendix E. The SSMP Adherence Review Checklist in Appendix B has 32 separate elements that were evaluated on SSMP content and adherence to that content. Without weighing the elements, the overall SSMP Adherence review rating is 2.7. However the first three SSMP sections, where most adherence could be measured, the rating would only be 2.2.

Based on the PMOC's SSMP Adherence Review, review of HART's sub plans associated with the SSMP, interviews, and its site visit, while the PMOC believes that HART has the technical capacity and capability to implement, manage, and complete the safety and security tasks and responsibilities described in its SSMP. The PMOC is concerned about a number of safety- and security-related areas in which operations and management of the safety and security functions should be strengthened. To strengthen these areas, HART must advance its timetable for hiring and training safety and security staff. This will help address the PMOC's recommendation for greater clarification of the roles and reporting structure of the GEC safety and security staff, which currently includes on-site safety advisors but only part-time security assistance. This has resulted, in the PMOC's view, in a lapse in keeping TVAs and, less so, HAs, up to date. The PMOC noted that on each of its site visits, the GEC was also on-site to conduct targeted TVAs but that only an original TVA dated July 1, 2009 was submitted as part of the PMOC document review.

Another Team area of concern is HART's over-reliance on the Honolulu Police Department (HPD) for guidance on current and future security needs. Additional PMOC review methodology

and assessment is identified in Section 3.4 of this report. The PMOC conclusions and recommendations are provided in Section 4.0.

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 C 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.

The PMOC review found that SSMP Revision 3.0A, dated February 29, 2012, is a significantly improved document over the previous submission. It contains all sections specified in FTA Circular 5800.1, and is compliant or acceptable for an FFGA 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. Section-by-section comments, including those pertaining to appendices, are detailed in Appendix C. Section 3.1 of this report presents 3 Findings resulting from the review, most including summaries or, in some cases, amplifications, of the Appendix C 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 compliant with requirements for an FFGA for the Project.

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

Prior to FFGA

- None

After FFGA

- The FTA should accept the grantee's SSMP Revision 3.0A, dated February 29, 2012, as acceptable for an FFGA.
- HART should finalize SSMP draft Revision 3.0A, incorporating the PMOC recommendations as agreed in its May 9, 2012 response to comments, and submit it to the FTA with its FFGA application.
- HART should work to reach an agreement with the GEC to place a HART safety professional in a vacant GEC Safety and Security Compliance Officer position and a HART security professional in a vacant GEC System Security Specialist position so they can be trained and mentored by the experienced GEC professionals they would report to and work alongside.
- The HART Quality Assurance Manager (QAM) needs to audit the safety and security department's adherence to the SSMP and associated plans and procedures requirements in his audit program.
- HART should make a concerted effort to bring all safety and security related documents up to date and expedite the review and finalization of red-lined documents currently in the files.

- HART should assure that all staff and consultant personnel clearly understand the Project and reporting relationships among HART, PMC, and GEC personnel assigned to the Project.
- HART should meet with the CSC to stress the need for a safety and security professional to be assigned in Honolulu to support the systems and operations responsibilities under the systems and operations and maintenance (O & M) portions of their contract.
- HART should fill the vacant Safety and Security Certification Manager Position that is currently advertised within thirty days after FFGA award.
- HART should establish a mechanism to assure that hazard analyses and threat and vulnerability analyses are done in pace with the design reviews and construction activities.
- HART should establish the Operational Readiness Working Group (ORWG) committee at least six months, but preferably nine months before the planned start of testing on the first segment.
- HART should include audits of the safety and security department, and other responsible departments, in adherence to the requirements of the SSMP and its support plans and procedures in its internal audit program.
- HART is not keeping up with the frequency of Fire Life Safety Working Group (FLSWG), Safety and Security Review Committee (SSRC), Safety and Security Certification Working Group (SSCWG) and other essential safety and security meetings that are required. HART initially needs to have at least monthly meetings with all stakeholders and increase the frequency of safety and security meetings as needed.

2.0 PROJECT BACKGROUND/DESCRIPTION

2.1 Objectives

This Safety and Security Management Plan (SSMP) and SSMP Adherence Review were undertaken in accordance with FTA's Operating Procedure 22 (OP 22), dated May 2010, to determine whether the Honolulu Authority for Rapid Transit (HART) SSMP Revision 3.0A, dated February 29, 2012, meets the requirements of FTA Circular 5800.1, dated August 1, 2007, sufficiently to support the project's Full Funding Grant Agreement (FFGA) application, and assess how well HART is adhering to the requirements of their existing FTA accepted SSMP for 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 Final Design (FD) phase and anticipates submitting an FFGA application in July 2012.

2.4 Documents Reviewed, Interviews, and Site Visits

The current SSMP submission is draft Revision 3.0A, dated February 29, 2012 and reflects the jointly-agreed upon content of Revision 2.0, modified to address the creation of HART and the project name change from Honolulu High-Capacity Transit Corridor Project (HHCTC) to Honolulu Rail Transit Project, and a few other minor changes. The PMOC reviewed the February 29, 2012 draft FFGA SSMP submission and provided comments to HART on March 30, 2012. HART responded on May 9, 2012 by completing the PMOC Comment Matrix to indicate they would incorporate all substantive comments made by the PMOC in the final SSMP to be submitted for FFGA award.

The March 30, 2012 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 FFGA stage of a project. The PMOC held an SSMP Adherence Review from May 1-3, 2012 on-site meeting and the team conclusions and recommendations are provided in Section 4.0.

Although members of the PMOC had previously complied with HART’s requirements for viewing Security Sensitive Information (SSI), none of the documents provided to the PMOC were so labeled. The PMOC received a revised draft of a Threat and Vulnerability Analysis (TVA), dated July 1, 2009, conducted by the GEC that was stamped Confidential on its cover page. Although not labeled as either an SSI or an agency controlled document, it was sent to the PMOC by the HART Executive Director via “certified mail—signature requested” to provide a level of confidentiality. SSMP Revision 3.0A contains an appropriate SSI policy (Section 2.2.1.1) that may not have been formulated in 2009, when the TVA was completed. *The PMOC*

recommends that HART's policy be more closely adhered to in labeling documents currently being created to better comply with existing Department of Homeland Security (DHS) and FTA policies and procedures.

The PMOC's conclusion from the review of support documentation, interviews, and site visits is that SSMP adherence is sufficient to support HART's application for a Full Funding Grant Agreement (FFGA). Detailed support of the findings and any recommendations for improving or resolving program deficiencies are presented in later sections of this report and in the Appendices.

2.4.1 Documents Reviewed

The PMOC reviewed the following grantee documents for this report:

- Safety and Security Management Plan, Revision 3.0A, February 29, 2012
- Safety and Security Certification Plan, Revision 2.0A, March 1, 2012
- Preliminary Hazard Analysis, Revision 1.0, March 13, 2012
- Threat and Vulnerability Analysis, July 1, 2009
- Fire-Life Safety Report, Revision 0 Draft, September 28, 2009
- Sample CILs for Safety and Security Certification, all labeled drafts
 - Core Systems Contract - Design, Construction, and Installation Conformance Checklist for PE, Element D, Traction Electrification System, Sub-element 037 Blue Light Stations
 - Core Systems Contract - Design, Construction, and Installation Conformance Checklist for PE, Element E, Train Control and Signaling
 - Core Systems Contract - Design, Construction, and Installation Conformance Checklist for PE, Element F, Communications and Control, Specification Conformance Summary
 - Core Systems Contract - Design, Construction, and Installation Conformance Checklist for PE, Element H, Passenger Vehicles, Sub-element 058 Couplers
 - Core Systems Contract - Design, Construction, and Installation Conformance Checklist for PE, Element L, Fare Vending, Specification Conformance Summary
 - WOFH CIL, No date
 - KHG CIL, No date
- Safety and Security Review Committee (SSRC), meeting minutes 20, November 10, 2011 and meeting minutes 21, May 17, 2012
- Safety and Security Certification Working Group (SSCWG), meeting minutes 28, April 4, 2012, meeting minutes 29, April 14, 2012 and meeting minutes 30, April 25, 2012

2.4.2 Persons Interviewed

The PMOC performed an SSMP Adherence Review of HART from May 1-3, 2012. A brief entry meeting was held with the HART Chief Safety and Security Officer (CSSO) to review the agenda and interview schedule and plan the site visit.

Interviews were conducted with individuals as listed below. Because of the large number of PMC (InfraConsult, LLC) personnel who are seconded to HART, throughout the report, these individuals are referred to as HART personnel.

Employees of the GEC, who fulfill a number of safety and security roles, are not seconded. They are available to HART either on a full-time, on-site basis (including the GEC Project Manager for the Honolulu Rail Transit Project; GEC System Safety and Security Manager, GEC Construction Safety and Security Manager. Available on an as-needed basis is the GEC Senior Security Specialist. The GEC Senior Security Specialist who is not named in the SSMP, Revision 3.0A Appendix C (Combined HART/GEC Organization Chart), but is listed as a project system security specialist in Appendix D of the SSMP's Integrated Safety and Security Organization Chart. This and other staffing issues are discussed by the PMOC in Section 3.2.2 and elsewhere in this report.

SSMP Revision 3.0A states in Section 2.3.2 that: “The GEC serves as the first line of communication and interface with Project Contractors for safety and security. The GEC communicates safety and security issues directly to the HART CSSO”, but interviews determined that although the GEC personnel are available to HART and respond to HART requests for safety and security services, they report directly through their own chain of command to the GEC Project Manager.

The PMOC also interviewed a project liaison from the Honolulu Police Department (HPD) and the interim Honolulu Department of Transportation State Oversight Agency (HDOT SOA) Project Manager who do not work directly for or on the Project but have safety and/or security roles.

The following is a chart of the HART, PMC, GEC, HPD and HDOT personnel that were interviewed during the SSMP Adherence Review:

Name	Project Title	Organization
Henry Miranda	Chief Safety and Security Officer	PMC
Toru Hamayasu	Deputy Executive Director	HART
Harvey Berliner	Deputy Project Officer – Engineering and Construction	PMC
Jurgen Sumann	Assistant Project Officer – Core Systems	PMC
Alberto Bonifacio	Quality Assurance Manager	PMC
In-Tae Lee	Assistant Project Officer – Facilities	HART
Richard Torres	Assistant Project Officer – DBB Projects	HART
Claude Philips	Safety and Security Engineer – Core Systems	HART
Roland Bueno	Safety and Security Engineer – DB/DBB	HART
James Van Epps	Project Manager	GEC
Tim White	Safety and Security Manager	GEC
Tracey Lawson	Construction Safety and Security Manager	GEC
Pete Leverso	Senior Security Specialist	GEC
Janet Crotteau	Honolulu Police Department	HPD
Jadine Urasaki	Interim SOA Project Manager	HDOT

An exit briefing was conducted by the PMOC on May 3, 2012 and the attendees included the HART ED, HART DED, HART CSSO and FTA Region 9 participated via telephone call-in.

3.0 PMOC'S FINDINGS, OBSERVATIONS AND COMMENTS

3.1 Findings

The findings below and in Appendices 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 is 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 3.0A, February 29, 2012, is a document that is significantly improved over the previous submission. It contains all sections specified in FTA Circular 5800.1, and is approved by the PMOC for an FFGA. Many of the PMOC recommendations pertain not to the SSMP itself but primarily HART's ability to implement its provisions based on staffing needs.
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 May 2012 site meetings.
3. All comments in Appendix B are identified as compliant (C) with no code entry in the Apply column. This indicates that they are fully acceptable as written for an FFGA and no revision unless changes resulting from HART or changed project conditions make it necessary.

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 (HDOT) 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 C, the SOA is aware of the requirement that it develop the 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.

A revised state oversight program schedule and a safety and security roadmap was provided to the FTA and the PMOC in March 2012. The HDOT, the designated SOA. The FTA, HART and the PMOC have been participating in monthly roadmap calls since March 2012 with HDOT.

3.2.2 Organization and Staffing

During organization and staffing discussions with the grantee's previous Safety and Security Manager (SSM) in 2011, the PMOC expressed concern that four positions in his organization - Safety and Security Certification Manager (SSCM), Construction Safety and Security Manager (CSSM), and two System Safety and Security Engineers (SSSEs) were unfilled and were not expected to be filled until the Project was in Final Design.

PMOC Concern: During the PMOC's previous SSMP Revision 2.0 review in 2011, the PMOC was concerned over the reliance on either HPD or the GEC personnel in lieu of HART hiring its own security staff. Since then, the SSSEs have been hired by HART (with the designations System Safety & Security Engineers for CSC and for DB/DBB). Both are being trained by recently-appointed HART Chief Safety and Security Officer (CSSO), who has decades of safety experience on transit systems around the nation but little direct security experience. Despite following the PMOC's recommendation as to the title change for these engineers, in fact neither have security experience and each is new to the transit environment.

These hires have addressed some of the PMOC's previous concerns that the safety and security functions were filled solely by the seconded CSSO augmented by a small GEC staff that includes full-time safety staff, but no full-time security staff. Like the HART SSSEs, the two full-time GEC staff members have titles that reflect both safety and security but are, in fact, safety professionals with little, if any, past security experience or training.

There is a need for at least one full-time HART staff employee at this project phase to assure participation at design reviews and to work closely with contractors to assure that security concerns are addressed in such areas as construction site oversight and in overall design elements. Areas that a security professional could address include placement of security features such as surveillance cameras, visual displays to patrons, and possible placement of fare-gates if they are added to system designs. External and internal security configurations for the O & M facility should also be reviewed by a security professional. At present, the PMOC was unable to receive clear information as to whether these reviews take place and by whom.

Recommendations are discussed below.

It is the PMOC's professional opinion the hiring of the two HART SSSEs and the training /mentoring of them provides a model for hiring the additional HART safety and security personnel accounted for in the HART Organization Chart. By hiring in the near term, HART has the opportunity to locate personnel who have the technical skills required for the positions but are lacking in transit-specific experience and time to provide them with the necessary transit-specific training they will need to eventually take over the roles currently filled by PMC or GEC staff.

The PMOC was particularly impressed by the GEC CSSM. Her description of the Integrated Construction Safety and Security Management System (ISMS) designed by the GEC and the

safety training program and records she distributed to PMOC members, indicate a high level of interest and expertise. For this reason, and following the model of the hiring of the two SSSEs, the PMOC recommends that HART fill the current vacancy for a Construction Safety and Security Compliance Officer and make arrangement with the GEC for the new hire to work closely with, and receive training from the GEC CSSM. Similarly, the current vacancy for a System Security Specialist provides an opportunity for HART to hire an individual who could work with and accompany the GEC Senior Security Specialist when he is on-site and gain from his many years in transit policing and security.

This melding of the experienced GEC staff with new hires by HART would help to minimize the current concern that there are no security-specific positions staffed on a full-time basis by HART, PMC, or the GEC.

Contradictory explanations were provided to the PMOC for this situation. *The PMOC recommends that HART begin immediately to search for and hire full-time security personnel to fill existing vacancies.* The PMOC indicated this in its October 2011 review; based on organizational changes within HART the PMOC is encouraged that there is now greater understanding of the role security professionals might play in design reviews, discussions of fare collection configurations, or operational security needs with or in addition to the HPD. Despite the comments that the role of security in a project was to “make riders feel safe by their presence,” responses by senior HART staff to the PMOC’s comments at the exit interview indicated greater understanding of the behind-the-scenes roles of security professionals at all phases of a transit project, including during design reviews, when plans must be checked to assure compliance with the SSMP and with existing safety and security design criteria. HART indicated to the PMOC there may be difficulties attracting and retaining experienced staff given Hawaii’s geographic isolation, salary limits, and high cost of living relative to the mainland.

The PMOC noted some concern by HART as to where appropriate security staff might be recruited. To allay some misconceptions as to the type of experience that could be considered relevant, during the Exit Briefing the PMOC provided recommendations of areas that HART might consider recruiting to fill security positions. The PMOC agrees with HART that it is unlikely to find personnel with transit police/security experience, but HART might consider recruiting for its security positions at area college campuses, high-traffic shopping malls, or public utilities. These types of positions, rather than a specific municipal police background, may provide the experience in crime prevention, threat analysis, employment of surveillance systems, and customer contact that is transferable to the transit environment.

Similarly, the PMOC also suggested that vacant safety positions might be filled through a loan from other City and County agencies. The suggestions including canvassing the Honolulu Fire Department (HFD) for personnel with experience in overseeing implementation of various National Fire Prevention Association (NFPA) regulations and also considering whether a Fire Department retiree might be interested in the position on either an interim or permanent basis.

The PMOC understands that provisions for the GEC training newly-employed HART personnel or arranging to place HFD personnel on loan to HART will require negotiations among all the parties, but the PMOC strongly recommend that these options be considered to assure that staff

positions can be filled expeditiously and to assure that newly-hired incumbents are properly trained for their positions.

3.2.3 Clarification of the Role and Reporting Structure of the GEC

The PMOC noted some confusion from HART as to the role and reporting structure of GEC personnel, with some assuming they were fully integrated into the HART safety and security organization.

While the GEC personnel are available to HART managers (and thus far the GEC have responded affirmatively to all requests made of them), in fact they are not integrated into the HART management structure and report solely to the GEC Project Manager. It would be helpful if HART provided the PMOC with Task Order 5 for its safety- and security-related services. As indicated, at present there has been no disagreement over tasks to be performed, but the PMOC is concerned that HART call upon GEC staff members without any apparent understanding that these are not their staff. It would be best from an organizational standpoint, and possibly from a financial standpoint, if HART requested specific tasks of GEC staff through their Project Manager rather than place them in the position of agreeing to the task and then getting approval from the GEC Project Manager.

This is of particular concern in the area of security. As indicated above, although virtually all those currently assigned to safety and security positions have both the words “safety” and “security” in their titles, interviews with them established that none who are on the project full-time have security backgrounds.

3.2.4 Honolulu Police Department Liaison Role

The PMOC also has concerns surrounding HART’s reliance on the Honolulu Police Department (HPD) and HART’s view that the HPD is somehow a security consultant to it. The concerns center on the lack of permanence to the liaison position, as well as the unfamiliarity with transit security issues by the HPD incumbents. The PMOC suggests HPD visit other police departments that are working with other transit agencies on the mainland to understand their role.

The current liaison officer is the third over the life of the Project and has only been assigned since February 2012. While we would not expect an incumbent to have previously worked with a transit property, we are concerned that none have had particular experience in crime prevention areas or in working with civilian organizations such as, for instance, schools or colleges or malls.

Subsequent to the adherence review, in mid-June, the PMOC learned that the liaison interviewed during the review had been replaced by another HPD officer. *The PMOC recommends that HART impress on HPD the need for permanence in this position and the need for an incumbent whose past assignments may have included working with the existing bus network on developing responses to such transit-related issues as graffiti, scratchiti, fare disputes, and possible gang activity on or adjacent to transit property.*

While the HPD position is listed as a liaison, the PMOC received little information on what issues were regularly discussed. *PMOC Concern: The HPD does not currently provide any assistance with design reviews or any expertise that could assist in recommending elements of Crime Prevention through Environmental Design (CPTED) or Situational Crime Prevention (SCP) into the design packages. The PMOC is concerned that HART didn't mention these as areas where either HPD or its own security professionals could provide expertise and oversight of contractors.*

There were indications from HART that these services are provided by the GEC under Task Order 5, but without reviewing the task order the PMOC cannot be assured of this. The GEC's security consultant did indicate to the PMOC that in addition to undertaking a number of TVAs he has also reviewed design packages and changes electronically. While this provides some security input into design, particularly as the station packages are advanced, it would benefit HART to assure that someone with a security/crime prevention orientation regularly attends design meetings and reviews all changes from both a safety and a security viewpoint.

The PMOC had difficulty in determining what the HPD liaison role currently entails beyond participation in the Fire/Life Safety and Security Working Group (FLSWG). The PMOC noted that neither HART nor HPD has consulted with other transit agencies or law enforcement agencies as to the variety of policing and security configurations that often help decide whether it is more cost-effective to rely solely on the local police or to consider a dedicated in-house security force that would be augmented by police only in certain situations. Jurisdictional issues surrounding, for instance, fare-paid zones, issuing tickets for fare evaders, preventive patrol either on transit vehicles or in stations, and similar issues common to light rail systems should be under consideration even though no decisions need yet be made.

At present, a Memorandum of Agreement (MOA) does not exist between HART and HPD. Subsequent to the adherence review, during the PMOC's June 2012 break out session with HART on safety and security progress an MOA is to be developed within the next three months. *While the PMOC endorses this action, we recommend that HART have a clearer idea of what it expects from HPD so that the MOA is able to address such areas as response to fare evasion or similar activities that may result in the issuance of summonses rather than summary arrest. HART should meet with bus security supervisors to learn how HPD currently responds to incidents on buses and how it establishes liaison with bus security to have a model in mind for its HART-HPD policies and procedures.*

The PMOC noted in its previous review of SSMP Revision 2, the opinion that it was inappropriate to include a member of the HPD in the HART organization's chain of command, suggesting rather that the HPD staffer serve as a technical resource for security by fulfilling a general advisory role and serving as an advisor on security-related committees, but that the individual hold no organizational authority unless formally seconded to HART. This change is reflected in the current SSMP Revision 3.0A by describing the HPD member as a liaison, but there are no indications that our other concerns about the reliance by HART on HPD and GEC personnel in lieu of hiring its own security staff have been addressed yet.

The PMOC received indications from the Executive Director at the Exit Briefing that he shares at least part of this concern. Participating in monthly oversight meetings, telephonically or in person, the PMOC will continue to remind HART of the need for additional safety and security staff, and contribute as needed to assist the grantee in meeting this need.

3.2.5 Safety and Security Review Committee (SSRC)

In April 2011, the PMOC recommended that what was then termed the Safety and Security Oversight Review Committee (SSORC) be reorganized into a high-level SSRC supported by three subcommittees (which the grantee calls Working Groups to address Fire/Life Safety and Security (FLSWG), Safety and Security Certification (SSCWG), and Operational Readiness (ORWG).

The SSRC has been activated and the PMOC was able to review meeting minutes for November 10, 2011 (meeting 20) and May 17, 2012 (meeting 21). The PMOC found the minutes reflected the type of high-level discussion it had recommended be conducted by this committee. Among the items that the minutes reflected were discussions of the need to ensure that all existing and future Design/Bid/Build (DBB) contracts contain the necessary contract requirements regarding safety and security, with specific reference to specifications for the safety and security certification and construction safety and security that were previously developed and distributed.

3.2.6 Fire/Life Safety and Security Working Group (FLSWG)

In April 2011, the PMOC attended the first meeting of the FLSWG, a subcommittee of the SSRC. At that time, attendees included representatives from the Department of Emergency Management (DEM), HPD, HFD, GEC, and HART. Although the PMOC found the meeting satisfactory and fully acceptable for FD, the PMOC recommended expanding the SSMP to show all committees and working groups needed for later phases of the project. This has now been done as is required for FFGA submission.

This working group did not have a meeting scheduled during the SSMP Adherence Review; although the PMOC requested minutes of recent meetings, instead the PMOC received minutes of a committee identified as the Safety and Security Certification Working Group (SSCWG). Because the attendees' list did not include either the HPD or HFD, the PMOC believes this to be a different, strictly internal committee, possibly the committee as described in SSMP Section 3.2.4 as the Safety and Security Certification Working Group (SSCWG), this group is responsible for coordinating on certification issues and is independent of the FLSWG whose functions are more aligned with the activities mentioned in the minutes shared with the PMOC. The PMOC attributed this primarily to possible mislabeling of the minutes combined with the lack of transit-specific experience of the new SSSEs and unfamiliarity by a HART staffer who retrieved the documents with the committee and working group structure. During the next PMOC Safety and Security Quarterly Review we will review specific FLSWG minutes as well as request to attend a meeting of the FLSWG.

3.2.7 Operational Readiness Working Group (ORWG)

In Section 3.25 of the SSMP it describes the responsibilities of the Operational Readiness Working Group (ORWG). Commenting on the previous SSMP Revision 2, the PMOC noted that the text indicated that during FD, HART would “determine the appropriate timeline for establishing the ORWG” and recommended that, based on the accelerated nature of the first Project segment that could result in testing and start-up of that segment beginning very soon after the award of an FFGA. The ORWG should be established at least six months, but preferably nine months, before the planned start of testing on the first segment. Despite the PMOC’s recommendation that this change be reflected in the next revision of the SSMP, currently Revision 3.0A continues to describe this only as a future committee. The PMOC again recommends greater specificity.

3.2.8 Core Systems Contractor (CSC)

The Core Systems Contractor (CSC) is contractually responsible for three significant Project elements. The three significant Project elements are vehicles, systems, and operations and maintenance of the H RTP system. During the interviews, the PMOC learned that there were ongoing negotiations with the CSC to have the safety and security professional who will be involved in the systems work and transition into operations assigned to the project in Honolulu as soon as possible.

The CSC plans to have the vehicle safety professional share his time between the Ansaldo vehicle manufacturing facility in Italy and the American fabrication plant in Pittsburg, California, and handle project site safety and security requirements from Pittsburg, by telephone, for the foreseeable future.

PMOC Concern: The PMOC finds the CSC’s negative position on provision of adequate safety and security staff concerning, and not boding well as an indicator of the needed cooperation between HART and contractors to assure the Project is constructed safely, securely, and cost effectively. It is the PMOC’s professional opinion the vehicle safety professional cannot, even if he is well-versed in systems and operational safety and security, cannot adequately perform all these functions, and certainly not long distance.

Recommendation: The PMOC recommends that now, but no later than within the next three months, the CSC contractor assign a qualified safety and security professional to Honolulu to work closely with HART on the safety and security issues related to the systems design, installation, and testing and developing the operations safety and security needs.

3.3 SSMP Compliance Assessment

The review of SSMP Revision 3.0A 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 5800.1, dated August 1, 2007. The PMOC evaluated the content against that required for an FFGA.

As indicated in Appendix C, all plans and documents submitted to the PMOC should be reviewed for proper signature pages, dates, and revision numbers. In addition, the signature pages of all documents that are dated after April 9, 2012, require changes to reflect the appointment of the new HART Executive Director. The SSMP and SSCP require they be signed by the Executive Director in position at the time of the revision.

In reference to the SSMP, specifically, the PMOC noted that most recommendations made after review of SSMP Revision 2 had been incorporated into Revision 3.0A, including those relevant to an application for an FFGA. The comments made on draft Revision 3.0A and sent to HART on March 30, 2012 were responded to by HART on May 9, 2012, following the SSMP Adherence Review. In line with the HART ED commitment at the Exit Briefing, all substantive PMOC comments were indicated as “Accepted” and will be reflected in the formal HART SSMP submission for an FFGA. In total, 68 of the 72 PMOC comments, including all substantive comments, were indicated as accepted.

For an SSMP to be determined to be compliant with FTA Circular 5800.1, *Safety and Security Management Guidance for Major Capital Projects*, dated August 1, 2007, its contents must be reviewed based on a detailed section-by-section assessment of the SSMP’s content against the requirements for each section as detailed in Chapter IV of the Circular, which describes the organization and content for 11 Sections to be included in a SSMP. To assess the SSMP against Chapter IV, the PMOC began by reviewing HART’s SSMP Table of Contents to verify that the SSMP is organized in accordance with Circular 5800.1. The SSMP Table of Contents adequately incorporates the organizational structure and content required by Circular 5800.1 as do the individual chapters. The summary of the Compliance Assessment is included in the Review Checklist contained in Attachment C.

Based on its review of SSMP draft Revision 3.0A against the requirements of FTA Circular 5800.1 the PMOC has concluded that SSMP Revision 3.0A, dated February 29, 2012, finalized in line with HART’s May 9, 2012 responses, would be compliant with FTA requirements for award of an FFGA.

3.4 SSMP Adherence Assessment

The PMOC SSMP Adherence Review Assessment is provided in Appendix B and PMOC Adherence Review evaluation team members are provided in Appendix E. The PMOC performed an SSMP Adherence Review following the guidance provided in OP 22 Section 6.1.3. The following are initial activities that were performed during the PMOC’s SSMP Adherence Review for an FFGA:

- Reviewed relevant plans, policies, and procedures to determine their consistency with the SSMP and with the FTA’s intent for management of safety and security programs
- Reviewed documentation, including memoranda, reports, records, and minutes of safety- and security-related committees with the aim of verifying that the grantee has implemented the plans and procedures outlined in its SSMP

- Interviewed the grantee (HART), Project Management Consultant (PMC), General Engineering Contractor (GEC), and others identified in the SSMP as having safety and security responsibilities for the Project. A major focus of the interviews was to learn the roles of each individual, to determine how the HART and PMC personnel's efforts combined to assure a seamless safety and security organization, and to verify that personnel charged with carrying out the safety and security activities were aware of the SSMP and their responsibilities included in it, and were capable of meeting them
- Inspected selected sites to view evidence of the safety and security programs being implemented on project area, and participated in an alignment tour concentrated on possible alignment changes and other factors having safety/security implications

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 an FFGA award 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.

The SSMP Adherence Review Checklist in Appendix B has 32 separate elements that were evaluated on SSMP content and adherence to that content. Without weighing the elements, the overall SSMP Adherence review rating is 2.7. However the first three SSMP sections, where most adherence could be measured, the rating would only be 2.2.

3.5 Issues/Analysis

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 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.

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 3.0A, dated February 29, 2012 meets the requirements detailed in FTA Circular 5800.1 for acceptability for an FFGA. 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 compliant with requirements for an FFGA.
- The SSMP Adherence Review proceeded smoothly in large part due to the good cooperation from interviewees and all HART staff involved in supporting the review.
- For the most part, HART, PMC, and GEC personnel displayed a good understanding of the SSMP and their safety and security roles described in it. The actual performance of these activities aligned well with their SSMP descriptions.
- The PMOC was greatly encouraged to hear from the HART CSSO that there would be a more aggressive safety and security role on the Project than there had been in the past and to hear from the ED that he fully supported this more aggressive role.
- The PMOC was also impressed by the Integrated Safety and Security Management System (ISMS) being used by the GEC Construction Safety and Security Manager (GEC CSSM) and the quality and scope of the reports that have been generated to manage and monitor construction safety and security.
- There are currently two vacant Construction Safety and Security Compliance Officer (SSCO) positions that report to the GEC CSSM, only one of which is planned for filling by the GEC in the near future. The second SSCO position provides a good opportunity to hire a HART safety professional to be trained and mentored by the GEC CSSM in construction safety and security oversight and management.
- There is also a current vacancy for a System Security Specialist (SSS) that reports to the GEC System Safety and Security Manager (SSSM) that is not programmed for filling in the near future. The SSS position provides a good opportunity to hire a HART security professional to be trained and mentored by the SSSM and the existing well-seasoned GEC senior security specialist in security oversight and management.
- The PMOC was also impressed by the two HART SSSEs and the mentoring they are receiving from the HART CSSO. They both appear to have the potential to grow into more responsible positions under the HART CSSO's guidance, and illustrate the potential of repeating this model for the SSCO and SSS positions described above.

- The SSMP currently identifies the CSSO as a “technical resource” to the Change Control Board (CCB); the CSSO must be a full member of the CCB. The PMOC will review implementation of this change in its next PMOC monthly safety and security review.
- The PMOC observed that some plans and procedures reviewed were not up-to-date and others were filed as red-lined versions for extend periods while waiting for finalization. The PMOC will include review of all documents submitted in red-lined versions to assure they are in final format, including that recommended changes have been accepted or a rationale for non-acceptance provided, and that all are properly named, labeled, dated, and signed.
- The PMOC noted during interviews that there was some confusion as to the role of GEC personnel in the HART integrated safety and security organization. While GEC personnel coordinate with and provide information to and receive information from HART they are not integrated into the HART organization. They work solely for the GEC Project Manager under terms of their contract with HART. A clearer delineation of GEC project roles is needed. The PMOC has requested for its review Task Order 5 outlining the relationship and tasks.
- There are no full-time security professionals in the combined HART/PMC organization. Although there is one GEC security professional assigned to the project, his assignment is on a part-time basis, and, although there have been no conflicts with the GEC over his activities, since GEC personnel, as explained in the review, report to a separate chain of command, the possibility exists that his availability may not be guaranteed over the life of the project.
- The Core Systems Contractor (CSC) has not yet provided a safety and security professional on-site in Honolulu, and communication with off-site personnel is proving difficult due to the time difference between locations.
- The Safety and Security Certification Manager (SSCM) position that reports to the CSSO remains vacant, with certification efforts expected to increase in the near future.
- HAs and TVAs have not kept pace with design efforts. While it is encouraging that two targeted TVAs began during the Adherence Review, attention to the ongoing need for HAs and TVAs to parallel the design and construction progress must be paid by HART.
- The HART Quality Assurance Manager (QAM) does not include auditing of the safety and security department’s adherence to the SSMP and associated plans and procedures requirements in his audit program.

4.2 Recommendations

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

Prior to FFGA

- None

After FFGA

- The FTA should accept SSMP Revision 3.0A, dated February 29, 2012, as acceptable for FFGA.
- HART should finalize draft Revision 3.0A, incorporating the PMOC recommendations as agreed in HART's May 9, 2012 response to PMOC comments and submit it to the FTA with its FFGA application.
- HART should work to reach an agreement with the GEC to place a new HART safety professional in a vacant GEC Safety and Security Compliance Officer opening and also a HART security professional in a vacant GEC System Security Specialist position so they can be trained and mentored by the experienced GEC professionals they would report to and work alongside.
- The HART Quality Assurance Manager (QAM) needs to audit the safety and security department's adherence to the SSMP and associated plans and procedures requirements in his audit program.
- HART should make a concerted effort to bring all safety and security related documents up to date and expedite the review and finalization of red-lined documents currently in the files.
- HART should assure that all staff and consultant personnel clearly understand the project and reporting relationships among HART, PMC, and GEC personnel assigned to the project.
- HART should meet with the Core Systems Contractor to stress the need for a safety and security professional to be assigned in Honolulu to support the systems and operations responsibilities under the systems and O & M portions of their contract.
- HART should fill the vacant Safety and Security Certification Manager Position that is currently advertised within thirty days after FFGA award.
- HART should establish a mechanism to assure that HAs and TVAs are done in pace with the design reviews and construction activities.
- HART should establish the Operational Readiness Working Group (ORWG) committee at least six months, but preferably nine months before the planned start of testing on the first segment.
- HART should include audits of safety and security department, and other responsible departments, adherence to requirements of the SSMP and its support plans and procedures in its internal audit program.

- HART is not keeping up with the frequency of Fire Life Safety Working Group (FLSWG), Safety and Security Review Committee (SSRC), Safety and Security Certification Working Group (SSCWG) and other essential safety and security meetings that are required. HART initially needs to have at least monthly meetings with all stakeholders and increase the frequency of safety and security meetings as needed.

5.0 APPENDICES

Appendix A: Acronym List

C	▪	Compliant
CEL	▪	Certifiable Elements List
CIL	▪	Certifiable Items List
CPTED	▪	Crime Prevention Through Environmental Design
CSC	▪	Core Systems Contractor
CSSM	▪	Construction Safety and Security Manager
CSSO	▪	Chief Safety and Security Officer
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
GEC	▪	General Engineering Consultant
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
HPD	▪	Honolulu Police Department
H RTP	▪	Honolulu Rail Transit Project
IEI	▪	Interactive Elements Incorporated
ISMS	▪	Integrated Construction Safety and Security Management System
LONP	▪	Letter of No Prejudice
LPA	▪	Locally Preferred Alternative
M	▪	Marginally Compliant
MSF	▪	Maintenance and Storage Facility
N	▪	Non-compliant
NFPA	▪	National Fire Protection Association
O&M	▪	Operations and Maintenance
OP	▪	Oversight Procedure
ORWG	▪	Operational Readiness Working Group
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)
RAC	▪	Rail Activation Committee
RAM	▪	Rail Activation Manager
RAP	▪	Rail Activation Plan
RTD	▪	Rail Transportation Division (of the City and County of Honolulu)
SIT(P)	▪	System Integration Testing (Plan)
SOA	▪	State Oversight Agency
SSC	▪	Safety and Security Working Group
SSCM	▪	Security Certification Manager
SSCP	▪	Safety and Security Certification Plan
SSCVR	▪	Safety and Security Certification Verification Report
SSCWG	▪	Safety and Security Certification Working Group
SSMP	▪	Safety and Security Management Plan
SSP	▪	System Security Plan

- SSPP ▪ System Safety Program Plan
- SSPS ▪ State Safety Program Standards
- SSRC ▪ Safety and Security Review Committee
- SSSE ▪ Safety and Security Engineers
- SSSM ▪ System Safety and Security Manager
- TVA ▪ Threat and Vulnerability Analysis

Appendix B: SSMP Adherence Review Checklist

Grantee: Honolulu Authority for Rapid Transportation (HART)

Project: Honolulu Rail Transit Project

SSMP Adherence Review						
Honolulu Rail Transit Project Full Funding Grant Agreement					Adherence Rating Legend	
					Minimal: 1	Above Average: 4
					Below Average: 2	Full: 5
					Average: 3	
					Overall Review Rating: 2.7	
			Adherence Rating			
Ref Num	Item Description	Document Ref	PMOC Rating	Description	Audit Element(s)	Comments
1	Review of Plans, Policies, and Procedures					
1.1	In-depth of review all plans, policies, and procedures that make up the safety and security programs referenced in the SSMP	-	2	Plans listed in Appendix B of this report were reviewed	Review plans for adequacy and currency	-SSMP, SSCP, and other plans and procedures are filed in red-line versions - Some other plans, such as for Configuration Management and Interface Management procedures, are outdated since they have not been updated to reflect the new HART organization - Content of SSMP, SSCP and other plans would be acceptable if they are finalized in line with HART and PMOC comments in the filed red-line versions, which the CSSO has said will be done - Overall, because of the lack of final approved copies of the SSMP and SSCP and other plans and lack of currency of the CMP and IMP and others this element is rated below average
1.2	Safety & Security Management Plan (SSMP)	1.3	2	SSMP Rev 3A, 2/28/12 Red-Lined; SSMP Rev 2, 6/1/11 adherence	Review latest plan for adequacy and currency; verify FD adherence approved SSMP Rev 2, 6/1/11	- If SSMP Revision 3A had been finalized and the Policy Statement signed by the GM, the SSMP would have been rated above average. In its present state (See 1.1) it is rated below average - FD and early construction under LONPs are being conducted in line with SSMP Revision 2 requirements - The Safety and Security Certification Manager (SSCM) position has never been filled, weakening the ability to oversee that safety and security (SS) are adequately designed into the project and resulting in an adherence below average
1.3	Management Commitment and Philosophy	1.1	2	SS Policy and organization's SS culture	Policy Statement and adherence to its content	- Signed Policy Statement in SSMP Rev 2 provides a solid commitment to assuring safety and security is designed and built into the project

SSMP Adherence Review
Honolulu Rail Transit Project
Full Funding Grant Agreement

Adherence Rating Legend
Minimal: 1 Above Average: 4
Below Average: 2 Full: 5
Average: 3
Overall Review Rating: 2.7

			Adherence Rating			
Ref Num	Item Description	Document Ref	PMOC Rating	Description	Audit Element(s)	Comments
						<ul style="list-style-type: none"> - The continued lack of a full-time security professional in either the HART or seconded PMC staff, as well as the still vacant SSCM indicates past below average adherence to the professed management commitment to SS - The recently hired GM and CSSO have both professed a greater level of safety and security staffing and oversight to support the HART commitment to SS. While encouraging, it will have to be verified during a future adherence review
1.5	Change Control Board (CCB)	3.2.7	3	Committee to oversee configuration mgmt. and contract changes	CCB functional description, membership, and adherence to described responsibilities	<ul style="list-style-type: none"> - Functional description of responsibilities in SSMP and membership are in line with CCBs of major capital projects - Adherence to responsibilities will be monitored after construction activity generates change orders
2	Integration of Safety & Security Into Project Development	2				
2.1	Safety and Security Activities	2.1	2	Description of SS activities across the project phases	Adequacy of described activities to assure project SS; adherence to described activities	<ul style="list-style-type: none"> - 16 major activities are adequately described and descriptions break activities down into sub-activities - As shown in the Activities Matrix, activities are appropriate to the project phases - Evidence that all activities identified have been timely performed could not be produced. For example, the PMOC's request for a copy of the Construction Safety and Security Plan that is described in Activity 2.1.3 could not be met, despite the matrix showing that development of the CSSP was to begin in PE - While activity descriptions are in line with those required for a major rail construction project, the Project's adherence to them is below average
2.2	Procedures and Resources	2.2 2.2.1	2	Procedures and resources that will support the described	Adequacy of described procedures and resources to support;	<ul style="list-style-type: none"> - The procedures and resources described in the SSMP are appropriate for a major rail project - As indicated in the comments in 1.1, above, adherence is below

SSMP Adherence Review
Honolulu Rail Transit Project
Full Funding Grant Agreement

Adherence Rating Legend
Minimal: 1 Above Average: 4
Below Average: 2 Full: 5
Average: 3
Overall Review Rating: 2.7

			Adherence Rating			
Ref Num	Item Description	Document Ref	PMOC Rating	Description	Audit Element(s)	Comments
				activities	timely provision of the procedures and resources	average since some required procedures are outdated.
2.3	Resources	2.2.2	1	Budget and schedule for provision of resources to support activities	Adequacy of planned budget and schedule; adherence to planned provision of resources	<ul style="list-style-type: none"> - Appendix B provides FTEs by project phase for only two activities, SS Certification and Construction SS. There is no budget identified for the other activities - There is no schedule provided for the 16 activities, other than what can be inferred from the phase budgets for the two activities shown - The 0.5 FTE shown in Appendix B for HART over Construction SS during PE and FD was not provided. - Appendix B provides a below average budget, actually a staffing plan, for only two activities and for one of those activities the planned resources were not provided. In combination, the Project's adherence to this element is minimal.
2.4	Interface with Management	2.3	2	Process, communication lines, and organization manage and assure mgmt. oversight	Adequacy of organizational structure, reporting relationships, and interface descriptions; adherence to described interfaces	<ul style="list-style-type: none"> - SSMP Section 2.2.3 and Appendices C and D provide a description of an organization and lines of communication that are appropriate for a major rail project. - As indicated in 1.1, above, the existing SSMP Rev 2 is outdated and SSMP Rev 3A is still in red-line and unapproved - Some managers needed to accomplish the planned interface, such as for SS certification or oversight of construction SS have not yet been hired, making adherence to the planned management interface less than adequate
3	Assignment of Safety and Security Responsibilities					
3.1	Responsibility and Authority	3.1 and 3.1.1 to 3.1.20	2	Organization and responsibilities of the specific individuals who	Adequacy of organization and descriptions of individual, committee,	- SSMP Rev 3A Section 3.1 and its 20 subsections, as they appear in the red-lined version of the plan, provide a comprehensive description of responsibilities of all major players

SSMP Adherence Review
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Adherence Rating Legend
Minimal: 1 Above Average: 4
Below Average: 2 Full: 5
Average: 3
Overall Review Rating: 2.7

			Adherence Rating			
Ref Num	Item Description	Document Ref	PMOC Rating	Description	Audit Element(s)	Comments
				will implement the SSMP	and group responsibilities; adherence to that described	<p>in delivering a safe and secure project, individually, by committee, or by support group (i.e., consultant, contractor, interface agency)</p> <ul style="list-style-type: none"> - If finalized as it appears in red-line, the PMOC would rate it as above average, except for the unrealistic description of HPD Liaison responsibilities in Section 3.1.5, which lowers it to average - There has been a lack of continuity in the HPD Liaison position and none of them, including the current Liaison, have performed the described functions related to security input into design. - The described SSCM functions described in Section 3.1.3 are not being primarily carried out by the CSSO for the vacant position, as described in the SSMP, but by the lesser experienced SSSEs, whose duties are described in Section 3.1.4. - Given the above, adherence is below average and, on the whole, the lack of full time security input brings the overall rating to below average
3.2	Committee Structure	3.2 and 3.2.1 to 3.2.7	3	Organization, membership, and responsibilities of committees established for the Project	Adequacy of the planned committees and their responsibilities; adherence to the described structure and functionality	<ul style="list-style-type: none"> - As described in the red-lined version of SSMP Rev. 3A, Section 3.1 and its seven subsections provides a committee structure, with identified responsibilities that is appropriate for a major rail project - If finalized as it appears in red-line, the PMOC would rate Section 3.2 as above average - Two committees (ORWG and RAC) will not be established until well into the construction phase and the PMOC was unable to attend meetings of any of the five active committees (ESSC, SSRC, SSCWG, FLSWG, CCB) as none were scheduled during our visit - Minutes reviewed of SSRC and SSCWG meetings were found to be adequate - Since the SSMP description is not yet final, the overall rating is

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Adherence Rating Legend
Minimal: 1 Above Average: 4
Below Average: 2 Full: 5
Average: 3
Overall Review Rating: 2.7

			Adherence Rating			
Ref Num	Item Description	Document Ref	PMOC Rating	Description	Audit Element(s)	Comments
						average
3.3	Safety and Security Responsibilities Matrix	3.3	4	Responsibilities described in Section 3.1 presented in a matrix by project phase	.Adequacy of matrix to identify responsible parties by phase; adherence to those responsibilities	- The SS Responsibility Matrix shown as Figure 3-1 in Section 3.3 of the red-lined version of SSMP Revision 3A accurately reflects the activities shown in Section 2 of the SSMP and responsibilities shown in SSMP Section 3.1 and warrants an overall rating of above average for its simplicity. (The deficiencies in meeting the responsibilities described in 3.1, above, are not carried over to the responsibility matrix.)
4	Safety and Security Analysis					
4.1	Approach to Safety and Security Analysis	4.1	3	Describe how hazards and vulnerabilities will be identified and managed	Adequacy of approach description; adherence to described approach	- The text of Section 4.1 and referenced Appendices G and H in the red-lined version of SSMP Rev 3A provide a comprehensive description of how hazards and threats and vulnerability will be identified and resolved or mitigated and the process for determining acceptable levels of residual hazards and vulnerabilities. - If finalized as it appears in red-line, the PMOC would rate it as above average - Since the SSMP description is not yet final, the overall rating is average
4.2	Requirements for Safety and Security Analysis	4.2	3	Describe different types of analysis to be used	Adequacy of type descriptions; adherence to using the described analysis types	- The text of Section 4.2 and Figure 4-1, Hazard Analyses and Threat and Vulnerability Assessments, in the red-lined version of SSMP Rev 3A provide comprehensive descriptions of seven different types of analyses that will be used on the project and during which phases they will likely be used. - If finalized as it appears in red-line, the PMOC would rate it as above average - To date only two of the analysis types, HA and TVA, have been used. The HAs appear to be updated on reasonable frequency,

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Minimal: 1 Above Average: 4
Below Average: 2 Full: 5
Average: 3
Overall Review Rating: 2.7

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Ref Num	Item Description	Document Ref	PMOC Rating	Description	Audit Element(s)	Comments
						but TVAs has been lagging, but are now being updated. - Since the SSMP description is not yet final, the overall rating is average
5	Development of Safety and Security Design Criteria					
5.1	Approach to Development of Safety and Security Requirements and Design Criteria	5.1	3	Describe how Safety/Security requirements are established and criteria developed	Adequacy of development description; adherence to described processes	- Section 5.1 in the red-lined version of SSMP Rev 3A provides descriptions of the sources for SS requirements and development of Design Criteria, including the CCB role in proposed changes to approved criteria, and how the contract specifications are developed from the criteria. - From its spot review of the criteria, the PMOC holds the opinion that if they are consistent with design criteria for a major rail project - Because this will be a driverless rail system, HART will have to closely monitor design against the criteria and assure that every proposed deviation be thoroughly reviewed for SS impact. This will be monitored by the PMOC and checked in future adherence reviews - Since the SSMP description is not yet final, the overall rating is average
5.2	Design Reviews	5.2	3	Describe how reviews will insure SS is addressed	Adequacy of process description; adherence to process described	- Section 5.2 in the red-lined version of SSMP Rev 3A describes an adequate and typical design review process for a major rail project including formal review points and participation by stakeholders, including the SSRC - The PMOC was not able to participate in a design review during the Adherence Review, but interviewees verified their participation - The PMOC rates this element as average
5.3	Deviations and Changes	5.3	3	Describe how change reviews insure SS is	Adequacy of process description; adherence to	- Section 5.3 in the red-lined version of SSMP Rev 3A describes a better than average review process to assure SS is included in

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				addressed	process described	proposed deviations from criteria and contract changes. -If finalized as it appears in red-line, the PMOC would rate it as above average; since it is not yet final, the PMOC rates this element as average
6	Process for Ensuring Qualified Operations and Maintenance Personnel					
6.1	Operations and Maintenance Personnel Requirements	6.1	3	Identifies personnel needs by number and job classification	.Adequacy of classes and numbers of personnel; adherence to planned staffing levels	- Section 6.1 in the red-lined version of SSMP Rev 3A describes that staffing will be developed by the Core Systems Contractor (CSC) and the GEC drafted an OMP that will provide guidance to the CSC - Adherence to approved plan will be reviewed some time after the plan is developed by CSC and approved by HART - The PMOC rates the red-line content of Section 6.1 as average
6.2	Plans, Rules, and Procedures	6.2	3	Identifies plans, rules and procedures needed for safe and secure O & M	.Adequacy of O & M plans, rules and procedures identified; adherence to development schedule for identified items	- Section 6.2 in the red-lined version of SSMP Rev 3A describes the six items of plans, rules, and procedures identified in the GEC draft OMP that will be developed by the CSC – the operating rulebook, SOPs, EOPs, SSPP, SSP, and EPP. All O & M plans and procedures fit within these six items - Adherence to approved plan will be reviewed some time after the documents are developed by CSC and approved by HART - The PMOC rates the red-line content of Section 6.2 as average
6.3	Training Program	6.3	3	Identifies training to be provided to all personnel classes to prepare them to provide safe and secure revenue service	.Adequacy of training identified; adherence to training delivery plan	- Section 6.3 in the red-lined version of SSMP Rev 3A describes that the CRC will develop a training and qualification and submit it to HART for approval, and the role the SSRC will play in review and approval of the program - Adherence to approved plan will be reviewed some time after the training program developed by CSC and approved by HART - The PMOC rates the red-line content of Section 6.3 as average
6.4	Emergency Preparedness	6.4	3	Exercises and drills that will be used to prepare	Adequacy of identified exercises and drills;	- Section 6.4 in the red-lined version of SSMP Rev 3A properly describes that the SITP will identify all Emergency Drills to be

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				personnel for revenue operation	adherence to plan for conduct of drills and exercises	conducted as part of SIT and the participation of all start-up personnel and the CSC. - Adherence to SITP drill schedule and requirements will be reviewed some time after the SITP is developed and implemented - The PMOC rates the red-line content of Section 6.4 as average
6.5	Public Awareness	6.5	3	Commitment to an ongoing PA program	Adequacy of PA program; adherence to approved PA plans	- Section 6.5 in the red-lined version of SSMP Rev 3A describes that the HART Public Involvement Team (PIT) will develop the Project's public awareness program in conjunction with community groups. It will begin with a public awareness campaign during construction and continue with operational safety awareness and security awareness programs. - Adherence review of the PA program will be done some time after the TIP develops and starts the program - The PMOC rates the red-line content of Section 6.5 as average
7	Safety and Security Verification Process (Including Final Safety and Security Certification)					
7.1	Design Criteria Verification Process	7.1	3	Describe process for verifying conformance of design to approved criteria	Adequacy of described process; adherence to that process	Section 7.1 in the red-lined version of SSMP Rev 3A briefly but adequately describes that HART will use the safety and security certification process to verify that design conforms to approved criteria - Adherence to the process for design criteria conformance will be done some time after the D/B contractor designs are submitted and HART begins certifying them - The PMOC rates the red-line content of Section 7.1 as average
7.2	Construction Specification Conformance Process	7.2	3	Describe process for verifying conformance of construction to approved design	Adequacy of described process; adherence to that process	Section 7.2 in the red-lined version of SSMP Rev 3A briefly but adequately describes that HART will use the safety and security certification process to verify that construction conforms to the approved design

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						<ul style="list-style-type: none"> - Adherence to the process for construction specification conformance will be done some time after construction begins and HART begins certifying the constructed elements - The PMOC rates the red-line content of Section 7.1 as average
7.3	Testing/Inspection Verification	7.3	3	Describe process for verifying construction system elements are appropriately tested	Adequacy of described process; adherence to that process	<p>Section 7.3 in the red-lined version of SSMP Rev 3A adequately describes that testing and inspection verification process, including SIT, will be developed by the CSC contractor and be approved by HART. This section also identifies the various tests that will be completed by contractors on constructed elements that are part of the construction conformance process described in Section 7.2</p> <ul style="list-style-type: none"> - Adherence to the process for testing/inspection verification will be reviewed some time after testing begins - The PMOC rates the red-line content of Section 7.3 as average
7.4	Hazard and Vulnerability Resolution Verification	7.4	3	Describe process for verifying hazards and vulnerabilities are identified and resolved	Adequacy of described process; adherence to that process	<p>Section 7.4 in the red-lined version of SSMP Rev 3A adequately describes that hazard and vulnerability verification will be done through the safety and security certification process and use of the hazard and vulnerability tracking list to identify hazard and vulnerability resolutions as certifiable items</p> <ul style="list-style-type: none"> - Adherence to the process for hazard and vulnerability verification will be reviewed some time after resolutions and their verifications begin - The PMOC rates the red-line content of Section 7.4 as average
7.5	Operational Readiness Verification	7.5	3	Describe process for verifying all needed elements for operation are verified as being adequate and in place	Adequacy of described process; adherence to that process	<p>Section 7.5 in the red-lined version of SSMP Rev 3A adequately describes that operational readiness verification will be done through the safety and security certification process and use of the certifiable items list for the operations element that will be developed and included in the SSCP</p> <ul style="list-style-type: none"> - Adherence to the process for operational readiness verification will be reviewed some time after the operational readiness items are developed and certifications by HART begin.

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						- The PMOC rates the red-line content of Section 7.5 as average
7.6	Safety and Security Certification Requirements	7.6	3	Describe process for final certification	Adequacy of described process; adherence to that process	Section 7.6 in the red-lined version of SSMP Rev 3A adequately describes that the SSCVR will be prepared at the end of the safety and security certification process to verify that all certification requirements have been met or identify work-arounds or operating restrictions for any that have not been fully met. The section also provides a listing of the SSCVR required content. - Adherence to the SSCVR required will be reviewed after the report is developed at the end of the testing and start-up phase of the project. - The PMOC rates the red-line content of Section 7.6 as average
8	Construction Safety and Security					
8.1	Construction Safety and Security Program Elements	8.1	2	Describes the construction safety and security program that will be in effect for the Project	Adequacy of the described program; adherence to the program as described	- Section 8.1 in the red-lined version of SSMP Rev 3A adequately describes that construction safety and security requirements will be detailed in a Construction Safety and Security Plan (CSSP) that will require each contractor to develop and submit a contractor Site-Specific Safety and Security Plan (SSPP) that complies with the CSSP requirements. Section 8.1 also adequately describes how an alcohol and drug free workplace will be maintained. - If finalized as it appears in red-line, the PMOC would rate Section 8.1 as average. - Adherence to the requirements of Section 8.1 appears not to have occurred in the early construction contract let under a LNOP. As described in 2.1, the CSSP that was to be developed beginning in PE and should have been available before the first contract was awarded could not be provided to the PMOC. - While the content of Section 8.1 is average, lack of adherence to that content results in a below average rating

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8.2	Construction Phase Hazard and Vulnerability Analysis	8.2	2	Describes requirements for construction phase HAs and TVAs	Adequacy of description; adherence to description	- Section 8.2 in the red-lined version of SSMP Rev 3A adequately describes that contractors will be required to describe in their SSSPs how they will perform site-specific HAs and TVAs in compliance with CSSP requirements, as well as Job hazard analyses (JHAs) in accordance with OSHA requirements. Compliance to these requirements will be monitored by the GEC. - As described in the body of this report, the GEC Construction Safety and Security Manager (CSSM) is doing an excellent job. As also described in the report, and in 2.3 on this checklist, the required HART/PMC construction safety manager has yet to be hired, so the SSMP required HART oversight of work done by consultant personnel is not being provided - While the content of Section 8.2 is average, lack of adherence to SSMP oversight requirements results in a below average rating
8.3	Safety and Security Incentives	8.3	3	Describes any SS incentives offered to contractors	Adequacy of description; adherence to description	- Section 8.3 clearly states that incentives will not be offered
9	Requirements for 49 CFR Part 659, Rail Fixed Guideway Systems; State Safety Oversight	9	3	Describes activities to be performed to coordinate with SOA and a schedule for those activities	Adequacy of description; adherence to description	- Section 9 and referenced Appendix I, Road Map for Implementation of the HDOT SOA, clearly describe the steps and schedule of the steps needed to implement the SOA and identifies the CSSO as the primary point of contact with the SOA - The PMOC expects that once the SOA SSSP is developed, this section of the SSMP will be expanded to describe the compliance activities and schedule for developing the SSPP and SSP and interfacing with the SOA on Project development activities - For this stage of the SOA development, the content of Section 9 is rated as average.
10	FRA Coordination	10	3	Describes the performance of activities	Adequacy of description; adherence to description	- Section 10 clearly states that there will be no shared track and that coordination with the FRA is not required

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				to coordinate with FRA, if track is shared with a FRA-regulated railroad				
11	DHS Coordination	11	3	Describe how DHS requirements will be met	Adequacy of description; adherence to description	- Section 11 in the red-lined version of SSMP Rev 3A adequately describes that there are no current DHS or TSA requirements applicable to the project but representatives of both agencies are members of the FLSWG. The CSSO is the point of contact with DHS and will be responsible for implementing any directives issued. - If finalized as it appears in red-line, the PMOC would rate Section 11 as average.		

OVERALL RATING: The Checklist has 32 separate elements that were evaluated on SSMP content and adherence to that content. Without weighing the elements, the rating break down, as shown in the below Table 1, is 2.7. If, however the first three SSMP sections, where most adherence could be measured, the rating as shown in Table 2, is only 2.2

Table 1 - All Elements Averaged

Table 1 – Section 1, 2, and 3 Elements Averaged

Rating	Number of Items	Rating x No. of Items	Average	Rating	Number of Items	Rating x No. of Items	Average
1	1	1		1	1	1	
2	9	18		2	7	14	
3	21	63		3	1	3	
4	1	4		4	1	4	
5	0	0		5	0	0	
Total:	32	86	2.7	Total:	10	22	2.2

Appendix C: SSMP Review Checklist

FTA Circular 5800.1, *Safety and Security Management Guidance for Major Capital Projects*, dated August 1, 2007, Chapter IV describes the organization and content for 11 Sections to be included in a SSMP. The PMOC reviewed HART SSMP draft Revision 3.0A against these requirements to verify that the SSMP is organized in accordance with Circular 5800.1 and each section has the required content. The below review checklist mirrors the checklist contained in C5800.1 and provides a section-by-section assessment of the reviewed SSMP compliance with FTA requirements. As described in the body of the report, the SSMP assessment is based on SSMP draft Revision 3.0A incorporating comments indicated in May 9, 2012 response from HART when it is finalized for FFGA submission.

* PMOC ratings are: C (compliant)

M (marginal; compliant but should be improved)

N (non-compliant)

Ref.	Item	SSMP Review Checklist		SSMP (FFGA Application)	PMOC Rating*
		Honolulu Rail Transit Project Full Funding Grant Agreement			
Section 1: Management Commitment and Philosophy					
1.1	Safety and Security Policy Statement	<ul style="list-style-type: none"> • A <i>Safety and Security Policy Statement</i> 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 draft SSMP was signed by previous ED. Final submission should be signed by new ED.	C
1.2	Purpose of SSMP	<ul style="list-style-type: none"> • The SSMP implements the <i>Safety and Security Policy Statement</i>. • 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. 		Meets requirements for activities to be performed during the FD, Construction, and Testing and Start-up phases.	C

Ref.	Item	SSMP Review Checklist Honolulu Rail Transit Project Full Funding Grant Agreement	SSMP (FFGA Application)	PMOC Rating*
1.3	Applicability and Scope	<ul style="list-style-type: none"> • 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: <ul style="list-style-type: none"> ○ System-wide Elements, ○ Fixed Facilities, ○ Safety, Security, System Assurance, Operational, and Maintenance Plans and Procedures, and ○ 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.	C
1.4	SSMP Goal	<ul style="list-style-type: none"> • 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: <ul style="list-style-type: none"> ○ to establish safety and security requirements for the project; ○ 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; ○ to verify operational readiness; and ○ to ensure that a mechanism is provided to follow to completion the resolution of any restrictions to full safety and security certification. 	Goals are adequately described.	C
Section 2: Integration of Safety and Security into Project Development				
2.1	Safety and Security Activities	<ul style="list-style-type: none"> • 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. <ul style="list-style-type: none"> ○ One matrix may be prepared that combines safety and security activities by project phase, or separate matrices may be developed. 	Text description and combined Safety and Security Activity Matrix meet requirements.	C

Ref.	Item	SSMP Review Checklist Honolulu Rail Transit Project Full Funding Grant Agreement	SSMP (FFGA Application)	PMOC Rating*
2.2	Procedures and Resources	<ul style="list-style-type: none"> 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 procedures, including SSI management safety and security budget and schedule information provided should be better detailed.	M
2.3	Interface with Management	<ul style="list-style-type: none"> 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 meets requirements.	C
Section 3: Assignment of Safety and Security Responsibilities				
3.1	Responsibility and Authority	<ul style="list-style-type: none"> 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. <ul style="list-style-type: none"> Each individual staff member must be identified by title and affiliation. Each committee must be identified by name and acronym, with membership provided by title and affiliation. For each authority delegated to a contractor, the recipient individual or committee responsible for oversight must be shown. An organization chart must be provided. 	Description of personnel, contractors, and committees established to manage safety and security is comprehensive.	C
3.2	Committee Structure	<ul style="list-style-type: none"> Describes the organization and responsibilities of the different safety and security committees, including <ul style="list-style-type: none"> Safety and Security Review Committee; Fire/Life Safety Committee; Safety and Security Change Review Board; Safety and Security Operations Review Committee; and Other comparable committees. 	Committees, their functions, and membership are well described.	C

Ref.	Item	SSMP Review Checklist		PMOC Rating*
		Honolulu Rail Transit Project Full Funding Grant Agreement		
3.3	Safety and Security Responsibilities Matrix	<ul style="list-style-type: none"> • Presents the responsibility and reporting relationships for safety and security in the form of a matrix. <ul style="list-style-type: none"> ○ Separate matrices may be used for safety and security authorities and responsibilities, or a single matrix may be used. ○ 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 show responsibilities for activities to be performed during across the project phases.	C
Section 4: Safety and Security Analysis				
4.1	Approach to Safety and Security Analysis	<ul style="list-style-type: none"> • Describes the recipient's approach to the analysis of safety hazards and security vulnerabilities. • Known hazards and vulnerabilities must be: <ul style="list-style-type: none"> ○ Identified and categorized for their potential severity and probability of occurrence, ○ analyzed for potential impact, and ○ resolved by design, engineered features, warning devices, procedures and training, or other methods. 	Describes a sound approach to meet specified requirements.	C
4.2	Requirements for Safety and Security Analysis	<ul style="list-style-type: none"> • 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 all project phases.	C
Section 5: Development of Safety And Security Design Criteria				
5.1	Approach to Development of Safety and Security Design Criteria	<ul style="list-style-type: none"> • 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 will be developed and how design will be certifiable items will be identified.	C

Ref.	Item	SSMP Review Checklist		SSMP (FFGA Application)	PMOC Rating*
		Honolulu Rail Transit Project Full Funding Grant Agreement			
5.2	Design Reviews	<ul style="list-style-type: none"> 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. 		Adequately describes how safety and security issues will be addressed during design reviews.	C
5.3	Deviations and Changes	<ul style="list-style-type: none"> Identifies procedures for ensuring that changes to safety and security design criteria are appropriately reviewed and approved prior to adoption. 		Describes how changes will be managed and configuration management assured.	C
Section 6: Process for Ensuring Qualified Operations and Maintenance Personnel					
6.1	Operations and Maintenance Personnel Requirements	<ul style="list-style-type: none"> 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). 		Adequately meets requirements by describing how requirements will be developed by CRC (DBOM contractor for approval by HART).	C
6.2	Plans, Rules, and Procedures	<ul style="list-style-type: none"> 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. 		Provides a list of plans and procedures that will be developed by the CSC contractor for approval by HART.	C
6.3	Training Program	<ul style="list-style-type: none"> 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 the CSC requirement to develop and administer the training program, with HART oversight.	C

Ref.	Item	SSMP Review Checklist		SSMP (FFGA Application)	PMOC Rating*
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6.4	Emergency Preparedness	<ul style="list-style-type: none"> 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). 	Adequately outlines emergency drills and exercises that will be developed during the construction phase.	C	
6.5	Public Awareness	<ul style="list-style-type: none"> 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 the role of the HART Public Information Team that will develop and execute the public awareness program.	C	
Section 7: Safety and Security Verification Process					
7.1	Design Criteria Verification Process	<ul style="list-style-type: none"> 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. 	Provides a concise but good design verification process.	C	
7.2	Construction Specification Conformance Process	<ul style="list-style-type: none"> Describes the process used to ensure that elements of the system provided under construction, procurement, and installation contracts conform to the specifications. 	Provides a concise but good construction conformance verification process.	C	
7.3	Testing/Inspection Verification	<ul style="list-style-type: none"> 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. 	Provides a comprehensive overview of the required contractual tests and SIT and how they will be verified.	C	

Ref.	Item	SSMP Review Checklist		
		Honolulu Rail Transit Project Full Funding Grant Agreement	SSMP (FFGA Application)	PMOC Rating*
7.4	Hazard and Vulnerability Resolution Verification	<ul style="list-style-type: none"> 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 HA and TVA process and use of the Hazard (and vulnerability) Tracking Log to follow all identified hazards and vulnerabilities to verify their resolution.	C
7.5	Operational Readiness Verification	<ul style="list-style-type: none"> 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 the responsibility of the Rail Activation Committee and elements of operational readiness to be verified.	C
7.6	Safety and Security Certification Requirements	<ul style="list-style-type: none"> 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 the certification process and the development of the SSCVR.	C
Section 8: Construction Safety and Security				
8.1	Construction safety and Security Program Elements	<ul style="list-style-type: none"> 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 the HART CSSP that establishes contractor construction safety and security requirements	C
8.2	Construction Phase Hazard and Vulnerability Analysis	<ul style="list-style-type: none"> 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 contractor responsibility and HART oversight of construction HAs and TVAs.	C
8.3	Safety and Security Incentives	<ul style="list-style-type: none"> Describes any incentives that may be in place to support implementation of the construction safety and security program. 	Indicates there will be no safety and security incentives.	C
Section 9: Requirements for 49 CFR part 659, Rail Fixed Guideway Systems; State Safety Oversight				

Ref.	Item	SSMP Review Checklist		SSMP (FFGA Application)	PMOC Rating*
		Honolulu Rail Transit Project Full Funding Grant Agreement			
9.1- 9.3	Activities Implementation Schedule Coordination Process	<ul style="list-style-type: none"> 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. 	<ul style="list-style-type: none"> Provides an implementation schedule regarding the performance of activities required to meet SSO agency requirements 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. 	States that the SSPP and the SSP will be developed as soon as the SSPS is received from the SOO.	C
Section 10: Federal Railroad Administration (FRA) Coordination					
10.1- 10.3	Activities Implementation Schedule Coordination Process	<ul style="list-style-type: none"> 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. <ul style="list-style-type: none"> Each FRA regulation must be identified and the recipient's activity regarding that regulation must be specified 	<ul style="list-style-type: none"> Provides a schedule regarding the recipient's activities to comply with FRA regulations or to meet requirements for FRA waivers 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. 	States that no FRA interface is required.	C
Section 11: Department of Homeland Security (DHS) Coordination					
11.1	Activities Implementation Schedule Coordination Process	<ul style="list-style-type: none"> 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. Provides a schedule regarding the recipient's activities to comply with DHS requirements and programs. 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. 		Indicates that there are none current but future DHS/TSA requirements will be fully complied with.	C

*Rating: (C) - Compliant; (M) - Marginal; (N) - Non-compliant

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.

HART and HDOT executed the Memorandum of Agreement (MOA) on December 23, 2011. However, the MOA needed to be revised due to a potential conflict of interest and for HART to provide the technical funding directly to HDOT, which, in turn, will contract directly with the SOA consultant. The revised MOA was executed between HART and HDOT on February 3, 2012.

An interim HDOT State Oversight Agency (SOA) Project Manager has been working part-time since April 2011. HDOT anticipates hiring a full-time SOA Project Manager by summer 2012. FTA had identified that this position be filled by February 2012 in the Final Design approval letter. Given the status of this Project, it is critical that a permanent lead be identified as soon as possible.

The FTA, HART and PMOC participated in the first monthly roadmap call with HDOT on March 6, 2012 and subsequent roadmap calls are scheduled the first Tuesday of every month. HDOT also provided a letter to FTA on January 3, 2011 identifying a funding source for the SOA once the Project is in operations.

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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