

RE: Draft Agency Safety Plan

From Ben Magallon <bmagallon@dccm.com>

Date Tue 12/3/2024 4:57 PM

To Smith, Michael J. <mjsmith@rtaforward.org>; Lawson, Kevin <kevin.lawson@la.gov>

Cc JD Allen <jdallen@dccm.com>; Ed Elam <EElam@dccm.com>; Colin Ash <ColinA@dccm.com>; Foster, Michele <mfoster@rtaforward.org>; Mapp, Korrie J <kjmapp@rtaforward.org>; Toomey, Craig <ctoomey@rtaforward.org>; Butler, Ivana <ibutler@rtaforward.org>

Sent on behalf of Kevin Lawson, SSO

Mike,

Thank you for incorporating the SSOA team's feedback in your draft ASP update. We have reviewed the updated draft 3.0 sent yesterday and have no further comments at this time.

Please consider this transmission as the SSOA's conditional approval of your draft ASP update pending board adoption, LMSC approval, and signature by your accountable executive.

Once your full approval process is complete, please provide the final ASP so the SSOA can review and provide final approval.

Thank you,
Ben

Ben Magallon, AICP, TSSP-Rail/Bus

Project Manager

ATG | DCCM

512.821.2081 p 504.655.5720 c

Please note that our e-mail addresses have changed.

From: Smith, Michael J. <mjsmith@rtaforward.org>

Sent: Monday, December 2, 2024 8:00 AM

To: Ben Magallon <bmagallon@dccm.com>; Lawson, Kevin <kevin.lawson@la.gov>

Cc: JD Allen <jdallen@dccm.com>; Ed Elam <EElam@dccm.com>; Colin Ash <ColinA@dccm.com>; Foster, Michele <mfoster@rtaforward.org>; Mapp, Korrie J <kjmapp@rtaforward.org>; Toomey, Craig <ctoomey@rtaforward.org>; Butler, Ivana <ibutler@rtaforward.org>

Subject: Re: Draft Agency Safety Plan

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Ben,

Good morning. Please see attached revision incorporating your feedback, below.

I've updated all appendices including the SPTs and "proposed" RRPTs. The RBI Procedures Manual that the SSO sent on 9/9/24 is incorporated as a new Appendix F and I added references to it in the two key subsections. I hope this helps.

Please let me know if you have any questions or concerns.

Thanks,

Mike

From: Ben Magallon <bmagallon@dccm.com>

Sent: Friday, November 22, 2024 4:16 PM

To: Smith, Michael J. <mjsmith@rtaforward.org>; Lawson, Kevin <kevin.lawson@la.gov>

Cc: JD Allen <jdallen@dccm.com>; Ed Elam <EElam@dccm.com>; Colin Ash <ColinA@dccm.com>; Foster, Michele <mfoster@rtaforward.org>; Mapp, Korrie J <kjmapp@rtaforward.org>; Toomey, Craig <ctoomey@rtaforward.org>; Butler, Ivana <ibutler@rtaforward.org>

Subject: RE: Draft Agency Safety Plan

Sent on behalf of Kevin Lawson, SSO

Mike,

The SSOA team has reviewed your Draft ASP submittal and provides the following comments regarding content that will need for the SSO to approve the ASP.

- **RBI:** In the introduction to the section (3.1.2) our original text referencing inclusion of the NORTA RBI Procedures Manual has been swapped out:
 - **Original language:** "Some categories necessitate the development of agency-specific procedures, and Appendix ___ of this document contains NORTA's RBI Procedures Manual addressing those sections."
 - **Updated draft language:** "Some categories necessitate the development of agency-specific procedures, many of which are currently in development. When these procedures are developed and receive the concurrence of appropriate Executive and Senior Leadership Team members, they will be incorporated into this Plan by reference."

- **Please note** that the original language was approved by FTA to be included in the ASP's appendix as part of their acceptance of LADOTD SSOAs RBI Program submission. Would you be comfortable including the **following revision** to your updated language that would include the FTA accepted appendix:
 - i. **Recommended updated draft language:** "Some categories necessitate the development of agency-specific procedures, many of which are currently in development. **These procedures will follow guidelines provided by the SSOA in Appendix __ of this document, which contains NORTA's RBI Procedures Manual addressing those sections.** When these procedures are developed and receive the concurrence of appropriate Executive and Senior Leadership Team members, they will be incorporated into this Plan by reference." Done
 - ii. **Please also include** references to the NORTA RBI Procedures Manual in 3.1.2.2 (Category 2 – RBI Policies and Procedures) and 3.1.2.3 (Category 3 – Data Sources and Collection). Incorporated the Procedures Manual as Appendix F and added two references to the Appendix as requested.
- **Updated safety event definitions and thresholds:** Please ensure this section reflects updates to safety event definitions and reporting thresholds which take effect 1/1/25, per the revised 674. Please also consider removing the footnote, which now links to an outdated FTA resource, and reference 674.33 instead.
 - We have sent you our own version of an updated two-hour notification guide based on the old FTA resource linked in the footnote; if you wants to include that document instead in the appendix or by reference some other way, that's another option. Opted to list out the new thresholds from the reg and also cited SOP #004-005 which is currently being revised to align. I removed the outdated footnote. Thanks.
- **RWP:** Please ensure the ASP references that 671 requires a program be developed and approved by the SSOA by December 2, 2025. It should be ok to leave out all the detail of what is required in RWP aside from a quick summary of the requirements.
 - Please ensure that the detail included about refresher training being required every three years is amended to indicate every two years per 671.41(a)(4). Done.
- 1. **Targets:** Do you have a timeline on when targets will be available for inclusion? Included. Please note the RRPTs are proposed at this time; this will be on the agenda for LMSC's consideration in this Thursday's meeting (along with the full Plan).

We recognize that there is some effort involved in these updates and appreciate you and your team's continued dedication to safety. **Please let us know if you would like to set up a stand alone meeting to discuss the ASP or any of this feedback.**

Our interest is to help you adopt a compliant ASP withing your existing timeline and we are happy to discuss any of the above feedback.

Thank you,

Ben Magallon, AICP, TSSP-Rail/Bus

Project Manager

ATG | DCCM

512.821.2081 p 504.655.5720 c

Please note that our e-mail addresses have changed.

From: Smith, Michael J. <mjsmith@rtaforward.org>

Sent: Wednesday, November 13, 2024 4:21 PM

To: Lawson, Kevin <kevin.lawson@la.gov>

Cc: JD Allen <jdallen@dccm.com>; Ed Elam <EElam@dccm.com>; Ben Magallon <bmagallon@dccm.com>; Colin Ash <ColinA@dccm.com>; Foster, Michele <mfoster@rtaforward.org>; Mapp, Korrie J <kjmapp@rtaforward.org>; Toomey, Craig <ctoomey@rtaforward.org>; Butler, Ivana <ibutler@rtaforward.org>

Subject: Draft Agency Safety Plan

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Kevin,

Good afternoon. Please find attached, current draft revision of the RTA ASP. I am attaching both track changes and clean versions for your review.

Notes:

Some appendices are still pending at this time, namely the Safety Performance Targets and Risk Reduction Targets in Appendix A; Organizational Chart in Appendix B; and evidence that the LMSC reviewed and approved the draft (Appendix F). I intend to formally obtain the LMSC's approval on or around 12/5/24. (You should have received an invite for the LMSC meeting scheduled on that date.)

FTA's requirements relative to targets (and introduction of risk reduction program provisions) were a significant shift from previous requirements under Part 673. The subsequent revisions have taken more time than anticipated, but in the interest of giving you the time you need to thoroughly review, I am sending the revision in its current state.

We are happy to send the updated appendices separately when they become available.

Highlights of the revision include the following:

- Adds all ELT signatures to concurrence page
- Incorporates regulatory changes in: 670, 672, 673, and 674
- Addresses requirements regarding the Accountable Executive's role in implementing/considering safety risk mitigations recommended by the LMSC
- Adds new key positions to the safety responsibilities sub-section in Section I
- Adds a section on the risk reduction program as required (see 2.6)
- Adds a new sub-section in Section II (SRM) that discusses how, specifically, risk mitigations related to the risk reduction program will be handled (see 2.4.1)
- Adds a section on the RWP program, which we will update throughout the year as we work to build a more robust program in compliance with Part 671 (just released)
- Adds specific SMS-related training, along with general updates, to Competencies & Training (see 4.1 and new sub-section 4.1.1)
- Incorporates what the SSO has shared regarding the RBI program (see 3.1.2)
- Adds references to a new LMSC SOP-- which is intended to replace many of the sections in SAF5 regarding the administration of the Safety Committee, in accordance with FTA requirements
- Adds specific source-types that, at a minimum, must result in CAPs per 674.37 (see 3.7.1)
- Updates status notes on SMS Implementation activities in Appendix E (matches our most recent submittal to the SSO)

Please let me know if you have any questions or concerns. We look forward to receiving your feedback.

Thanks,

Mike

Mike Smith

Chief Safety, Security & Emergency Management Officer

New Orleans Regional Transit Authority



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