

**LAREDO WEBB COUNTY AREA  
METROPOLITAN PLANNING ORGANIZATION  
ACTION ITEM**

<b>DATE:</b> 9-21-20	<b>ITEM:</b> IV-B.
<b>SUBJECT:</b> MOTION(S) Motion to approve and adopt the Laredo Transit Management Inc. (LTMI) Public Transportation Agency Safety Plan (PTASP) and Safety Performance Targets and to incorporate into the Metropolitan and Statewide Planning Process with the Laredo Metropolitan Planning Organization (MPO).	
<b>INITIATED BY:</b> MPO Staff El Metro Staff	<b>STAFF SOURCE:</b> J. Kirby Snideman, MPO Director Claudia San Miguel, Transit General Manager
<b>PREVIOUS COMMITTEE ACTION:</b> None	
<b>BACKGROUND:</b> In accordance with 49 U.S.C. 5303(h)(2)(B) and 5304(d)(2)(B), each State and transit agency must make its safety performance targets available to States and Metropolitan Planning Organizations to aid in the planning process. 49 C.F.R. § 673.15(b) requires, to the maximum extent practicable, a State or transit agency to coordinate with States and Metropolitan Planning Organizations in the selection of State and MPO safety performance targets. Performance Measures in Transportation Improvement Programs (TIP) and Metropolitan Transportation Plans MPOs are required to reference the safety performance targets and agency safety plans in their TIPs and Metropolitan Transportation by December 31, 2020.  As a result, the Laredo transit public transportation provider, El Metro, also known as the Laredo Transit Management Inc. (LTMI), has developed and is recommending for the Laredo MPO to adopt the LTMI Public Transportation Agency Safety Plan (PTSAP) and Safety Performance Targets which have been approved by the City of Laredo Mass Transit Board and certified by Texas Department of Transportation (TxDOT) Public Transportation Division (PTN). The LTMI's PTASP was adopted and approved by the Laredo Mass Transit Board on May 4, 2020 and subsequently certified by TxDOT Public Transportation Division on July 16, 2020.  <b>Attachments:</b> <ul style="list-style-type: none"><li>• Texas Department of Transportation letter of approval.</li><li>• Federal Register / Vol. 83, No. 139 / Thursday, July 19, 2018/Rules and Regulations.</li><li>• El Metro Transit Agency Safety Plan.</li></ul>	
<b>FINANCIAL IMPACT:</b> No Impact.	
<b>COMMITTEE RECOMMENDATION:</b> Approval	<b>STAFF RECOMMENDATION:</b> Approval



125 EAST 11TH STREET, AUSTIN, TEXAS 78701-2483 | 512.463.8588 | WWW.TXDOT.GOV

July 30, 2020

Ms. Claudia San Miguel  
General Manager  
Laredo Transit Management, Inc.  
1301 Farragut St  
Laredo, TX 78040


Dear Ms. Miguel,

I am pleased to inform you that the Texas Department of Transportation (TxDOT), as the certifying agency for small public transportation providers in the State of Texas, certifies the El Metro Public Transportation Agency Safety Plan (PTASP), dated July 16, 2020.

The PTASP is compliant with the elements outlined in The Final PTASP Rule (49 C.F.R. Part 673).

If you have any questions or require additional information, please contact Theodore Kosub, PTASP Program Manager at 512-486-5971 or by email at [theodore.kosub@txdot.gov](mailto:theodore.kosub@txdot.gov).

Sincerely,

DocuSigned by:  


615C2AE8C799461...  
Mark A. Sprick, AICP  
Director, Administration and Program Support  
Public Transportation Division

# Laredo Transit Management, Inc.

## El Metro Transit

### Public Transportation Agency Safety Plan

Version 1

Adopted May 4, 2020

In compliance with 49 CFR Part 673

Developed in conjunction with the  
Texas Department of Transportation

## TABLE OF CONTENTS

<b>1. Executive Summary .....</b>	<b>4</b>
A. Plan Adoption – 673.11(a)(1).....	5
B. Certification of Compliance – 673.13(a)(b).....	5
<b>2. Transit Agency Information – 673.23(d).....</b>	<b>6</b>
A. Authorities & Responsibilities – 673.23(d) .....	9
<b>3. Safety Policies and Procedures.....</b>	<b>10</b>
A. Policy Statement – 673.23(a).....	10
I. Employee Safety Reporting Program – 673.23(b).....	10
II. Communicating the Policy Throughout the Agency – 673.23(c).....	12
B. PTASP Development and Coordination with TxDOT – 673.11(d) .....	12
C. PTASP Annual Review – 673.11(a)(5).....	13
D. PTASP Maintenance – 673.11(a)(2)(c) .....	15
E. PTASP Documentation and Recordkeeping – 673.31 .....	15
F. Safety Performance Measures – 673.11(a)(3) .....	15
G. Safety Performance Target Coordination – 673.15(a)(b) .....	17
<b>4. Safety Management Systems – 673 subpart C.....</b>	<b>18</b>
A. Safety Risk Management – 673.25 .....	19
I. Safety Hazard Identification – 673.25(b).....	20
II. Safety Risk Assessment – 673.25(c).....	22
III. Safety Risk Mitigation – 673.25(d).....	24
B. Safety Assurance – 673.27 (a).....	25
I. Safety Performance Monitoring and Measuring – 673.27 (b).....	26
II. Safety Event Investigation – 673.27(B)(3) .....	27
C. Safety Promotion – 673.29 .....	29
I. Safety Competencies and Training – 673.29(a).....	29
II. Safety Communication – 673.29(b).....	31
<b>5. Appendix A.....</b>	<b>33</b>
A. Glossary of Terms.....	37
B. Additional Acronyms Used.....	41
<b>6. Appendix B.....</b>	<b>42</b>
A. City Council/Board Minutes or Resolution .....	42

## LIST OF FIGURES

Figure 1: El Metro Organizational Chart .....	8
Figure 2: Safety Management Systems.....	18
Figure 3: Safety Risk Management Process .....	19
Figure 4: Draft Risk Register.....	20
Figure 5: Safety Risk Assessment Steps in Populating the Risk Register .....	23
Figure 6: Safety Risk Assessment Matrix .....	23
Figure 7: Risk Register Mitigation Component .....	25

## LIST OF TABLES

Table 1: Agency Information.....	7
Table 2: ASP Annual Update Timeline .....	14
Table 3: ASP Record of Changes .....	14
Table 4: NSP Safety Performance Measures.....	15
Table 5: Baseline 2019 Safety Performance Measures.....	16
Table 6: Fixed Route (Bus) Safety Performance Targets.....	16
Table 7: Demand Response Safety Performance Targets.....	17
Table 8: PTASP Supporting Documents .....	33

## 1. EXECUTIVE SUMMARY

Moving Ahead for Progress in the 21st Century (MAP-21) granted the Federal Transit Administration (FTA) the authority to establish and enforce a comprehensive framework to oversee the safety of public transportation throughout the United States. MAP-21 expanded the regulatory authority of FTA to oversee safety, providing an opportunity to assist transit agencies in moving towards a more holistic, performance-based approach to Safety Management Systems (SMS). This authority was continued through the Fixing America's Surface Transportation Act (FAST Act).

In compliance with MAP-21 and the FAST Act, FTA promulgated a Public Transportation Safety Program on August 11, 2016 that adopted SMS as the foundation for developing and implementing a Safety Program. FTA is committed to developing, implementing, and consistently improving strategies and processes to ensure that transit achieves the highest practicable level of safety. SMS helps organizations improve upon their safety performance by supporting the institutionalization of beliefs, practices, and procedures for identifying, mitigating, and monitoring safety risks.

There are several components of the national safety program, including the National Public Transportation Safety Plan (NSP), that FTA published to provide guidance on managing safety risks and safety hazards. One element of the NSP is the Transit Asset Management (TAM) Plan. Public transportation agencies implemented TAM plans across the industry in 2018. The subject of this document is the Public Transportation Agency Safety Plan (PTASP) rule, 49 CFR Part 673, and guidance provided by FTA.

Safety is a core business function of all public transportation providers and should be systematically applied to every aspect of service delivery. At Laredo Transit Management, Inc. (LTMI), all levels of management, administration and operations are responsible for the safety of their clientele and themselves. To improve public transportation safety to the highest practicable level in the State of Texas and comply with FTA requirements, the Texas Department of Transportation (TxDOT) has developed this Agency Safety Plan (ASP) in collaboration with the City of Laredo and the Laredo Mass Transit Board with fiduciary responsibility for (LTMI).

To ensure that the necessary processes are in place to accomplish both enhanced safety at the local level and the goals of the NSP, the City of Laredo, the Laredo Mass Transit Board and LTMI adopt this ASP and the tenets of SMS including a Safety Management Policy (SMP) and the processes for Safety Risk Management (SRM), Safety Assurance (SA), and Safety Promotion (SP), per 49 U.S.C. 5329(d)(1)(A).<sup>1</sup> While safety has always been a primary function at LTMI, this document lays out a process to fully implement an SMS over the next several years that complies with the PTASP final rule.

---

<sup>1</sup> Federal Register, Vol. 81, No. 24

### ***A. Plan Adoption – 673.11(a)(1)***

This Public Transit Agency Safety Plan is hereby adopted, certified as compliant, and signed by:

Claudia San Miguel, El Metro General Manager

	
ACCOUNTABLE EXECUTIVE SIGNATURE	DATE

Since El Metro is considered a department of the City of Laredo, the main governing body is the Laredo City Council acting as the Laredo Mass Transit Board. Approval of this plan by the City Council/Mass Transit Board occurred on May 4, 2020 and is documented in RESOLUTION No. 2020-RT-06 from the City Council Meeting.

### ***B. Certification of Compliance – 673.13(a)(b)***

TxDOT certifies on July 16, 2020, that this Agency Safety Plan is in full compliance with 49 CFR Part 673 and has been adopted and will be implemented by El Metro as evidenced by the plan adoption signature and necessary City Council/Laredo Mass Transit Board approvals under Section 1.A of this plan.

## 2. TRANSIT AGENCY INFORMATION – 673.23(D)

The City of Laredo began operating public transportation in 1985. LTMI was founded in 2003 and is governed by the City of Laredo Mass Transit Board. The City contracts with First Transit, Inc. to provide management and operating services. Under the contract, First Transit, Inc. provides a General Manager and two Assistant General Managers. The General Manager is approved by the Laredo Mass Transit Board to oversee the administrative functions of LTMI. LTMI is known as El Metro.

El Metro is the public transportation provider for the City of Laredo, Texas and is the largest transit provider in the region. The El Metro main office/transfer center is located at 1301 Farragut St., Laredo, TX 78040.

El Metro operates fixed route services seven days a week across 23 routes within the City of Laredo. Schedules for fixed route service vary by route, with many routes having one schedule for Monday-Friday or Monday-Saturday and another schedule for Saturdays or Sundays/Holidays. In addition, some routes have A and B segments that have differing schedules. El Metro also operates El Lift Paratransit, which provides shared, origin to destination public transportation to people with disabilities who are unable to use El Metro's fixed route buses. El Lift uses the following service schedule:

- Monday, Wednesday, Friday: 5:00 am – 10:30 pm
- Tuesday, Thursday: 5:30 am – 10:30 pm
- Sunday: 8:00 am – 8:30 pm

El Metro Transit is provided by the City of Laredo through the Laredo Mass Transit Board and managed by a private contractor, First Transit, Inc. which provides the General Manager and the management team consisting of the Assistant General Manager of Maintenance & Facilities, the Assistant General and Manager of Administration and Operations. The Maintenance Asset Officer, the Mobility Manager, the Operations Manager, the Transit Procurement Specialist, the Chief Safety Officer (CSO), and Safety and Training Coordinator are part of Laredo Transit Management, Inc.

No additional transit service is provided by El Metro on behalf of another transit agency or entity at the time of the development of this plan.

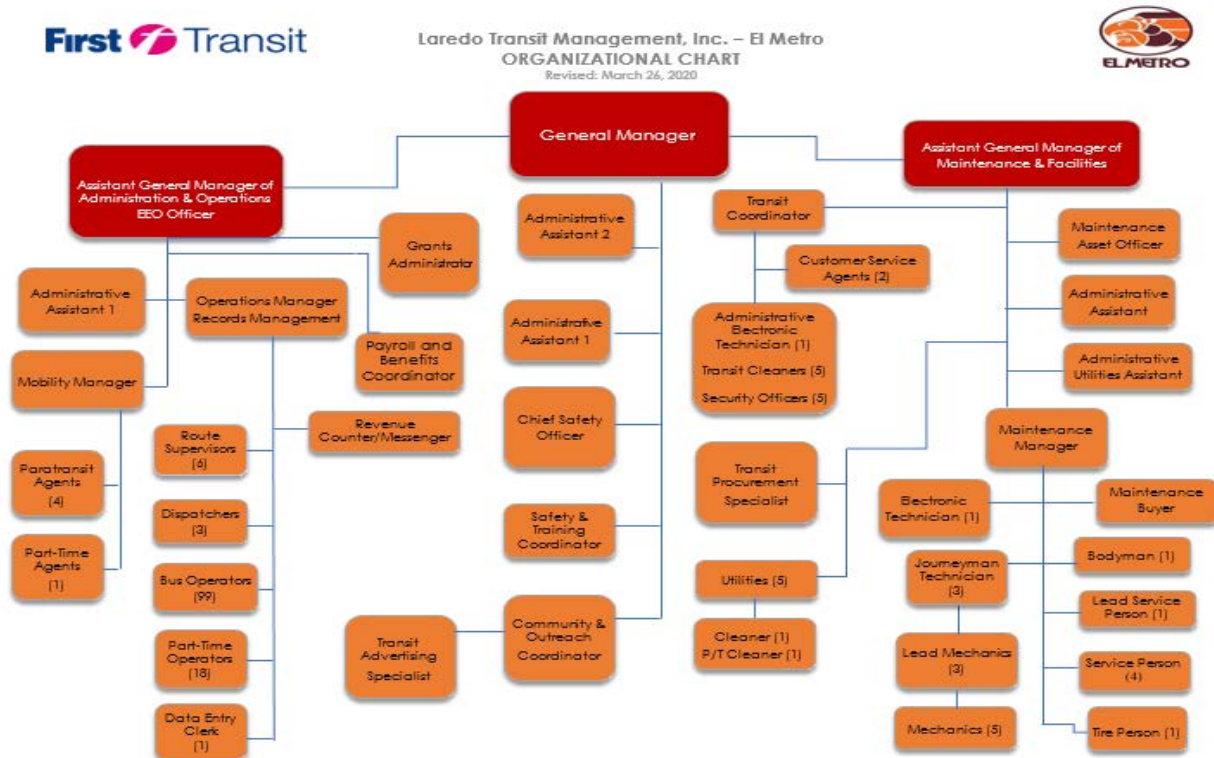
Table 1 contains agency information, while an organizational chart for El Metro is provided in Figure 1.



**TABLE 1: AGENCY INFORMATION**

Information Type	Information
Full Transit Agency Name	Laredo Transit Management, Inc. (LTMI)
Transit Agency Address	1301 Farragut St, Laredo, TX 78040
Name and Title of Accountable Executive 673.23(d)(1)	Claudia San Miguel, General Manager
Name of Chief Safety Officer or SMS Executive 673.23(d)(2)	Adrian Chavera, Chief Safety Officer
Key Staff	Joe Jackson, AGM of Maintenance & Facilities
Key Staff	Rosa Soto, AGM of Administration & Operations
Key Staff	Joe Lerma, Safety & Training Coordinator
Mode(s) of Service Covered by This Plan 673.11(b)	Fixed Route Bus and Demand Response
List All FTA Funding Types (e.g., 5307, 5310, 5311)	5307, 5310, 5339
Mode(s) of Service Provided by the Transit Agency (Directly operated or contracted service)	Fixed Route Bus and Demand Response
Number of Vehicles Operated	70

FIGURE 1: EL METRO ORGANIZATIONAL CHART



## A. Authorities & Responsibilities – 673.23(d)

As stated in 49 CFR Part 673.23(d), El Metro has established the necessary authority, accountabilities, and responsibilities for the management of safety amongst the key individuals within the organization, as those individuals relate to the development and management of our SMS. In general, the following defines the authority and responsibilities associated with our organization.

The **Accountable Executive** has ultimate responsibility for carrying out the SMS of our public transportation agency, and control or direction over the human and capital resources needed to develop and maintain both the ASP, in accordance with 49 U.S.C. 5329(d), and the agency's TAM Plan, in accordance with 49 U.S.C. 5326. The Accountable Executive has authority and responsibility to address substandard performance in the El Metro SMS, per 673.23(d)(1).

**Agency leadership and executive management** include members of our agency leadership or executive management, other than the Accountable Executive, CSO/SMS Executive, who have authority or responsibility for day-to-day implementation and operation of our agency's SMS.

The **CSO** is an adequately trained individual who has the authority and responsibility as designated by the Accountable Executive for the day-to-day implementation and operation of the El Metro SMS. As such, the CSO is able to report directly to our transit agency's Accountable Executive.

**Key staff** are staff, groups of staff, or committees to support the Accountable Executive, CSO or SMS Executive in developing, implementing, and operating our agency's SMS.

**Front line employees** perform the daily tasks and activities where hazards can be readily identified so the identified hazards can be addressed before the hazards become adverse events. These employees are critical to SMS success through each employee's respective role in reporting safety hazards, which is where an effective SMS and a positive safety culture begins.

In addition, over the next year, El Metro Payroll and Benefits Coordinator in collaboration with the CSO will be reviewing and modifying, if necessary, our current job descriptions to ensure the job descriptions comply with 49 CFR Part 673.

### 3. SAFETY POLICIES AND PROCEDURES

#### *A. Policy Statement – 673.23(a)*

El Metro recognizes that the management of safety is a core value of our business. The management team at El Metro has embraced the SMS and is committed to developing, implementing, maintaining, and constantly improving processes to ensure the safety of our employees, customers, and the general public. All levels of management and frontline employees are committed to safety and understand that safety is the primary responsibility of all employees.

El Metro is committed to:

- Communicating the purpose and benefits of the SMS to all staff, the union, managers, supervisors, and employees. This communication will specifically define the duties and responsibilities of each employee throughout the organization and all employees will receive appropriate information and SMS training.
- Providing appropriate management involvement and the necessary resources to establish an effective reporting system that will encourage employees to communicate and report any unsafe work conditions, hazards, or at-risk behavior to the management team.
- Identifying hazardous and unsafe work conditions and analyzing data from the employee reporting system. After thoroughly analyzing provided data, the transit operations division will develop processes and procedures to mitigate safety risk to an acceptable level.
- Ensuring that no action will be taken against employees who disclose safety concerns through the reporting system, unless disclosure indicates an illegal act, gross negligence, or deliberate or willful disregard of regulations or procedures.
- Establishing Safety Performance Targets (SPT) that are realistic, measurable, and data driven.
- Continually improving our safety performance through management processes that ensure appropriate safety management action is taken and is effective.

#### *I. Employee Safety Reporting Program – 673.23(b)*

Frontline employees are a significant source of safety data. These employees are typically the first to spot unsafe conditions that arise from unplanned conditions either on the vehicles, in the maintenance shop, or in the field during operations. For this reason, the Employee Safety Reporting Program (ESRP) is a major tenet of the PTASP Rule. Under this rule, agencies must establish and implement a process that allows employees to report safety conditions directly to senior management; provides protections for employees who report safety conditions to senior management; and includes a description of employee behaviors that may result in disciplinary action.

El Metro has an *Employee Safety Reporting Program (ESRP)* (Appendix A, Table 8 shows the document name, file name, and date of adoption) under which the employees are expected to use established procedures to submit comments, information, and assistance where safety and health is concerned. The program requires employees to report hazards, unsafe conditions, and unsafe behaviors to the Safety & Training Coordinator, Chief Safety Officer, the immediate supervisor, any Safety Planning Advisory Committee (SPAC) member or Department Head. Employees have the option of submitting reports confidentially and as such can report concerns without fear of repercussions. The program also calls for employees to meet on a regular basis to discuss safety and health issues. These meetings also provide another avenue for employees to report concerns.

In addition, El Metro has a policy in place in the *General Rules, Regulations and Policies Employee Handbook* (Appendix A) that requires employees who discover a condition which imperils the welfare of passengers, employees, and/or equipment to promptly report the problem to the Maintenance, Supervisor or Dispatcher.

El Metro also has a *Customer Comment/Complaint Procedure and Record Retention Policy* (Appendix A) that ensures riders of the system have an easy and accessible way to provide feedback to the agency. This procedure provides customers with a variety of ways to contact El Metro with comments or complaints and also provides protocols for feedback acknowledgment and customer report retention. In addition, employees can also submit safety concerns, anonymous or not, using the customer comment/complaint form on [www.elmetrotransit.com](http://www.elmetrotransit.com).

Over the next year, El Metro will review and modify, if necessary, both our internal and external reporting procedures and programs to develop them into a full ESRP to ensure that the procedure complies with 49 CFR Part 673. In order to implement, LTMI will conduct Instruction-Led Training for all employees. They will be presented with a PowerPoint presentation and copies of the reporting form. In addition, LTMI will post avenues for reporting, with protections, at each Department's bulletin board. Any changes will be submitted at annual certification. The procedures will also be provided to the union.

In general, the El Metro ESRP will ensure that all employees are encouraged to report safety conditions directly to senior management or their direct supervisor for elevation to senior management. The policy will include any contract employees. The policy will also spell out what protections are afforded employees who report safety related conditions and will describe employee behaviors that are not covered by those protections. The policy will also elaborate on how safety conditions that are reported will be reported back to the initiator(s) – either to the individual or groups of individuals or organization, dependent on the nature of the safety condition.

To bolster the information received from frontline employees, El Metro will also review our current policy for how our agency receives information and safety related data from employees and customers. If necessary, we will develop additional means for receiving, investigating and reporting the results from investigations back to the initiator(s) – either to the person, groups of persons, or distributed agency-wide to ensure that future reporting is encouraged.

## **II. Communicating the Policy Throughout the Agency – 673.23(c)**

El Metro is committed to ensuring the safety of our clientele, personnel and operations. Part of that commitment is developing an SMS and agency wide safety culture that reduces agency risk to the lowest level possible. The first step in developing a full SMS and agency wide safety culture is communicating our LTMI Safety Management Policy (SMP) (Appendix A, Table 8 shows the document name, file name, and date of adoption) throughout our agency. LTMI will provide Instruction-Led Training to all employees so that they can be familiar with our SMP and where they can find it. It will be posted at all Department's bulletin boards. Any rules or procedures will be provided to the Union.

The SMP and safety objectives are at the forefront of all communications. This communications strategy will include posting the policy in prominent work locations for existing employees and adding the policy statement to the on-boarding material for all new employees. In addition, the policy statement will become part of our agency's regular safety meetings and other safety communications efforts. The policy will be signed by the Accountable Executive so that all employees know that the policy is supported by management.

Possible methods of communicating the LTMI Safety Management Policy to employees include, but are not limited to, the following:

- New Employee Orientation
- Driver's Training
- Internal Marketing Strategies
- Instructor-Led Training
- Safety Meetings
- El Metro Toolbox Talk (Safety Bulletin)
- Safety Planning Advisory Committee
- Staff Meetings
- Department Bulletin Boards
- Employee Handbooks

## ***B. PTASP Development and Coordination with TxDOT – 673.11(d)***

This PTASP has been developed by TxDOT on behalf of Laredo Urban Transportation Study, which is the Metropolitan Planning Organization (MPO) for the area, and LTMI in accordance with all requirements stated in 49 CFR Part 673 applicable to a small public transportation provider. TxDOT mailed a formal call for participation in a State sponsored PTASP development process to all Texas Section 5307 small bus transit agencies on January 15, 2019 and followed that call with a series of phone calls and additional correspondence. El Metro provided a letter to TxDOT opting into participation on March 15, 2019 and has been an active participant in the development of this plan through sharing existing

documentation and participating in communication and coordination throughout the development of this plan. The El Metro documentation used in the development of this plan is presented in Table 8, in Appendix A.

In support of tracking performance on our Safety Assurance (SA) and Safety Promotion (SP) processes, El Metro conducts a yearly safety culture survey. This survey is intended to help El Metro assess how well we communicate safety and safety performance information throughout our organization by gauging how safety is perceived and embraced by El Metro’s administrators, supervisors, staff and contractors. The survey is designed to help us assess how well we are conveying information on hazards and safety risks relevant to employees’ roles and responsibilities and informing employees of safety actions taken in response to reports submitted through our ESRP. Results from our most recent survey were analyzed and incorporated into the implementation strategies contained in this ASP.

Once the documents were reviewed, an on-site interview was conducted with El Metro to gain a better understanding of the agency and the agency’s personnel. This understanding was necessary to ensure that the ASP was developed to fit El Metro’s size, operational characteristics, and capabilities.

The draft ASP was delivered to LTMI/El Metro in March 2020 for review and comment. Once review was completed and any adjustments made, the final was delivered to LTMI/El Metro for review and adoption.

### *C. PTASP Annual Review – 673.11(a)(5)*

Per 49 U.S.C. 5329(d)(1)(D), this plan includes provisions for annual updates of the SMS. As part of El Metro’s ongoing commitment to fully implementing SMS and engaging our agency employees in developing a robust safety culture, El Metro will review the ASP and all supporting documentation annually. The review will be conducted as a precursor to certifying to FTA that the ASP is fully compliant with 49 CFR Part 673 and accurately reflects the agency’s current implementation status. Certification will be accomplished through El Metro’s annual Certifications and Assurances reporting to FTA.

The annual review will include the ASP and supporting documents (Standard Operating Procedures [SOP], Policies, Manuals, etc.) that are used to fully implement all the processes used to manage safety at El Metro. All changes will be noted (as discussed below) and the Accountable Executive will sign and date the title page of this document and provide documentation of approval by the Laredo Mass Transit Board whether by signature or by reference to resolution.

As processes are changed to fully implement SMS or new processes are developed, El Metro will track those changes for use in the annual review. The annual ASP review will follow the update activities and schedule provided below in Table 2.

**TABLE 2: ASP ANNUAL UPDATE TIMELINE**

Task	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept
Review Agency Operations	→							
Review SMS Documentation <ul style="list-style-type: none"> <li>• Safety Management Policy;</li> <li>• Safety Risk Management;</li> <li>• Safety Assurance; and</li> <li>• Safety Promotion.</li> </ul>		→						
Review Previous Targets and Set or Continue Targets			→					
Report Targets to National Transit Database (NTD), TxDOT, Laredo Urban Transportation Study					→			
Make Any Necessary Adjustments to PTASP						→		
Update Version No., Adopt & Certify Plan Compliance								★

As shown in Table 2, LTMI will hold staff meetings to review Agency Operations from February 1 to March 30. Management, key personnel, and the CSO will review SMS documentation from March 1 to April 30. LTMI will hold a staff meeting to review previous targets and set or continue targets from April 1 to May 30. The Accountable Executive, Grants Administrator, and CSO will report targets to NTD, TxDOT and Laredo Urban Transportation Study from June 1 to June 30. LTMI will hold a staff meeting to discuss any necessary adjustments to the PTASP from July 1 to August 30. From August 30 to September 30, the Accountable Executive will review changes and sign and date the document. The document will be submitted to the Laredo Mass Transit Board (City Council) for approval and adoption. LTMI will coordinate with TxDOT to advise of the updated version of the PTASP and it will be submitted to FTA. Instruction-Led Training will be provided to all employees informing them of any changes.

The following table, Table 3, will be used to record final changes made to the ASP during the annual update. This table will be a permanent record of the changes to the ASP over time.

**TABLE 3: ASP RECORD OF CHANGES**

Document Version	Section/Pages Changed	Reason for Change	Reviewer Name	Date of Change
Header	Text	Text	Text	Text
Header	Text	Text	Text	Text
Header	Text	Text	Text	Text

The implementation of SMS is an ongoing and iterative process, and, as such, this PTASP is a working document. Therefore, a clear record of changes and adjustments is kept in the PTASP for the benefit of safety plan performance management and to comply with Federal statutes.



#### *D. PTASP Maintenance – 673.11(a)(2)(c)*

El Metro will follow the annual review process outlined above and adjust this ASP as necessary to accurately reflect current implementation status. This plan will document the processes and activities related to SMS implementation as required under 49 CFR Part 673 Subpart C and will make necessary updates to this ASP as El Metro continues to develop and refine our SMS implementation.

#### *E. PTASP Documentation and Recordkeeping – 673.31*

At all times, El Metro will maintain documents that set forth our ASP, including those documents related to the implementation of El Metro's SMS and those documents related to the results from SMS processes and activities. El Metro will also maintain documents that are included in whole, or by reference, that describe the programs, policies, and procedures that our agency uses to carry out our ASP and all iterations of those documents. These documents will be made available upon request to the FTA, other Federal entity, or TxDOT. El Metro will maintain these documents for a minimum of three years after the documents are created. These additional supporting documents are cataloged in Appendix A and the list will be kept current as a part of the annual ASP review and update.

#### *F. Safety Performance Measures – 673.11(a)(3)*

The PTASP Final Rule, 49 CFR Part 673.11(a)(3), requires that all public transportation providers must develop an ASP to include safety performance targets (SPTs) based on the safety performance measures established under the NSP. The safety performance measures outlined in the NSP were developed to ensure that the measures can be applied to all modes of public transportation and are based on data currently being submitted to the NTD. The safety performance measures included in the NSP are fatalities, injuries, safety events, and system reliability (State of Good Repair as developed and tracked in the TAM Plan).

There are seven (7) SPTs that must be included in each ASP that are based on the four (4) performance measures in the NSP. These SPTs are presented in terms of total numbers reported and rate per 100,000 Vehicle Revenue Miles (VRM). Each of the seven (7) is required to be reported by mode as presented in Table 4.

**TABLE 4: NSP SAFETY PERFORMANCE MEASURES**

Safety Performance Measure	SPT	
Fatalities	Total Number Reported	Rate Per 100,000 VRM
Injuries	Total Number Reported	Rate Per 100,000 VRM
Safety Events	Total Number Reported	Rate Per 100,000 VRM
System Reliability	Mean distance between major mechanical failure	

Table 5 presents El Metro's reported baseline numbers for each of the performance measures. El Metro collected the past five (5) years of reported data to develop the rolling averages listed in the table.

TABLE 5: BASELINE 2019 SAFETY PERFORMANCE MEASURES

Mode	Fatalities	Rate of Fatalities per 100,000 VRM	Injuries	Rate of Injuries per 100,000 VRM	Safety Events	Rate of Safety Events per 100,000 VRM	Mean Distance Between Major Mechanical Failure
Fixed Route (Bus)	0	0	3.8	0.22	2	0.12	39,590.7
Demand Response	0	0	0	0	0	0	28208.2

\*rate = total number x 100,000 /total vehicle revenue miles traveled

While safety has always been a major component of our agency operation, the adoption of this ASP will result in changes across all aspects of the organization designed to improve safety outcomes. The SPTs set in Table 6 and Table 7 reflect an acknowledgment that SMS implementation will produce new information that will be needed to accurately set meaningful SPTs. We will set our targets, except *Vehicle Revenue Miles*, at the current NTD reported five-year average as we begin the process of fully implementing our SMS and developing our targeted safety improvements. This will ensure that we do no worse than our baseline performance over the last five years. Our Target Vehicle Revenue Miles for Fixed Route was set at 1,719,000, because of some route changes and our Circulator route. The projected increase of vehicle revenue miles is to accommodate these changes. However, the projected increase had an aggressive impact on our *Mean Distance Between Major Mechanical failures* but the number of Major mechanical failures remained the same as our five-year average.

TABLE 6: FIXED ROUTE (BUS) SAFETY PERFORMANCE TARGETS

Mode	Baseline	Target
Fatalities	0	0
Rate of Fatalities per 100,00 VRM	0	0
Injuries	3.8	3.8
Rate of Injuries per 100,000 VRM	0.22	0.22
Safety Events	2	2
Rate of Safety Events per 100,000 VRM	0.12	0.12
Mean Distance Between Major Mechanical Failure	39,590.7	40,163.5

\*rate = total number for the year x 100,000 /total vehicle revenue miles traveled

**TABLE 7: DEMAND RESPONSE SAFETY PERFORMANCE TARGETS**

Mode	Baseline	Target
Fatalities	0	0
Rate of Fatalities per 100,000 VRM	0	0
Injuries	0	0
Rate of Injuries per 100,000 VRM	0	0
Safety Events	0	0
Rate of Safety Events per 100,000 VRM	0	0
Mean Distance Between Major Mechanical Failure	28,208.2	28,152

\*rate = total number for the year x 100,000/total vehicle revenue miles traveled

As part of the annual review of the ASP, El Metro will re-evaluate our SPTs and determine whether the SPTs need to be refined. As more data is collected as part of the SRM process discussed in this plan, El Metro may begin developing safety performance indicators to help inform management on safety related investments.

### ***G. Safety Performance Target Coordination – 673.15(a)(b)***

El Metro will make our SPTs available to TxDOT and the Laredo Urban Transportation Study to aid in those agencies' respective regional and long-range planning processes. To the maximum extent practicable, El Metro will coordinate with TxDOT and the MPO in the selection of State and MPO SPTs as documented in the Interagency Memorandum of Understanding (MOU) (Appendix A).

Each year during the FTA Certifications and Assurances reporting process, El Metro will transmit any updates to our SPTs to both the Laredo Urban Transportation Study and TxDOT (unless those agencies specify another time in writing).

## 4. SAFETY MANAGEMENT SYSTEMS – 673 SUBPART C

As noted previously, FTA has adopted SMS as the basis for improving safety across the public transportation industry. In compliance with the NSP, National Public Transportation Safety Plan, and 49 CFR Part 673, El Metro is adopting SMS as the basis for directing and managing safety and risk at our agency. El Metro has always viewed safety as a core business function. All levels of management and employees are accountable for appropriately identifying and effectively managing risk in all activities and operations in order to deliver improvements in safety and reduce risk to the lowest practical level during service delivery.

SMS is comprised of four basic components: SMP, SRM, SA, and SP. The SMP and SP are the enablers that provide structure and supporting activities that make SRM and SA possible and sustainable. The SRM and SA are the processes and activities for effectively managing safety as presented in Figure 2.

FIGURE 2: SAFETY MANAGEMENT SYSTEMS



Implementing SMS at El Metro will be a major undertaking over the next several years. This ASP is the first step to putting in place a systematic approach to managing the agency's risk. El Metro has already taken several steps to implement SMS, such as developing this initial ASP and designating a CSO. During the first year of implementation, El Metro will identify SMS roles and responsibilities and key stakeholder groups, identify key staff to support implementation, and ensure the identified staff receive SMS training. El Metro will also develop a plan for implementing SMS, inform stakeholders about the ASP, and discuss our progress toward implementation with the City of Laredo, the Laredo Mass Transit Board and our agency's planning partners.

### A. Safety Risk Management – 673.25

By adopting this ASP, El Metro is establishing the SRM process presented in Figure 3 for identifying hazards and analyzing, assessing and mitigating safety risk in compliance with the requirements of 49 CFR Part 673.25. The SRM processes described in this section are designed to implement the El Metro SMS.

FIGURE 3: SAFETY RISK MANAGEMENT PROCESS




The implementation of the SRM component of the SMS will be carried out over the course of the next year. The SRM components will be implemented through a program of improvement during which the SRM processes will be implemented, reviewed, evaluated, and revised, as necessary, to ensure the processes are achieving the intended safety objectives as the processes are fully incorporated into El Metro's SOPs.


The SRM is focused on implementing and improving actionable strategies that El Metro has undertaken to identify, assess and mitigate risk. The creation of a Risk Register provides an accessible resource for documenting the SRM process, tracking the identified risks, and documenting the effectiveness of mitigation strategies in meeting defined safety objectives and performance measures. The draft Risk Register is presented in Figure 4.

FIGURE 4: DRAFT RISK REGISTER


Hazard	Type	Likelihood	Consequence	Resolution



What is wrong?



What could happen



What could mitigate this?

As the SRM process progresses through the steps of identifying what may be wrong, what could happen as a result, and what steps El Metro is taking to resolve the risk and mitigate the hazard, the CSO completes and publishes the various components of the Risk Register. These components include the use of safety hazard identification, safety risk assessment, and safety risk mitigation, as described in the following sections.

## I. Safety Hazard Identification – 673.25(b)

El Metro currently has a Job Safety Checklist (Monthly Safety Walk Checklist) and a Safety Equipment Checklist, both of which are found in Section X of the *Safety Policy* (Appendix A). These checklists provide a means of regularly inspecting job sites and equipment to identify potential hazards before they result in negative safety outcomes. El Metro has a Hazard Communication Program located in Section 9 of the *General Rules, Regulations and Policies Employee Handbook*. This program is based on the requirements of the Occupational Safety Health Administration (OSHA)’s Hazard Communication Standard. In addition, El Metro’s *Maintenance and Facility Plan* (Appendix A) details procedures for preventative maintenance for vehicles and facilities. Although the current procedures have been effective in achieving our safety objectives, to ensure compliance with 49 CFR Part 673, El Metro is working to implement the following expanded SRM process.

The El Metro SRM process is a forward-looking effort to identify safety hazards that could potentially result in negative safety outcomes. In the SRM process, a hazard is any real or potential condition that can cause injury, illness, or death; damage to or loss of the facilities, equipment, rolling stock, or infrastructure of a public transportation system; or, damage to the environment.

Hazard identification focuses on out-of-the-norm conditions that need special attention or immediate action, new procedures, or training to resolve a condition that is unacceptable and return conditions to an acceptable level. El Metro uses a variety of mechanisms for identifying and documenting hazards, namely:

- Through training and reporting procedures, El Metro ensures personnel can identify hazards and that each employee clearly understands that the employee has a responsibility to immediately report any safety hazards identified to the employee's supervisors. Continued training helps employees to develop and improve the skills needed to identify hazards.
- Employee hazard training coupled with the ESRP ensures that El Metro has full use of information from frontline employees for hazard identification.
- Upon receiving the hazard report, Supervisors/Department Heads communicate the identified hazard to the Safety & Training Coordinator or CSO and the CSO will register the hazard into the risk register for risk assessment, classification and mitigation.
- In carrying out the risk assessment, the CSO uses standard reporting forms (e.g. *Facility (Lessee) Inspection Work Sheet* (Appendix A) and *Fixed Route Trip Cards* to mitigate mechanical based safety hazards that are identified) and other reports completed on a routine basis by administrative, operations and maintenance. The El Metro *Employee Safety Reporting Program* (Appendix A) contains procedures for flagging and reporting hazards as a part of day-to-day operations using different avenues to report, anonymous or not.
- Supervisors are responsible for performing and documenting regular safety assessments, which include reporting and recommending methods to reduce identified hazards.
- El Metro uses incident reports and records to determine specific areas of training that need to be covered with employees to ensure safety hazard identification is continually improved, and thus ensure that hazards are identified before an event recurrence.
- Incident reports are also analyzed by the SMS team (Safety & Training Coordinator and Chief Safety Officer) to identify any recurring patterns or themes that would help to identify underlying hazards and root causes of the event that can be mitigated to prevent recurrence.
- If a hazard is such that an employee would be reluctant to report the information due to perceived negative consequences (e.g. disciplinary action), alternative, anonymous reporting mechanisms are available through an anonymous suggestion box outside Operations Department Offices, an anonymous online reporting form on [www.elmetrotransit.com](http://www.elmetrotransit.com), or other secure mechanism.
- To increase the safety knowledge of our agency, the CSO, key safety personnel, SPAC Committee and qualified personnel from the respective department are also encouraged to participate in

available professional development activities and peer-to-peer exchanges as a source of expertise and information on lessons learned and best practices in hazard identification.

- Other sources for hazard identification include:
  - ESRP
  - Inspections of personnel job performance, vehicles, facilities and other data
  - Investigations of safety events
  - Safety trend analysis on data currently collected
  - Training and evaluation records
  - Internal safety audits
  - External sources of hazard information could include:
    - FTA and other federal or state authorities
    - Reports from the public
    - Safety bulletins from manufacturers or industry associations

In addition to identifying the hazard, the hazard identification process also classifies the hazard by type (organizational, technical or environmental) to assist the CSO in identifying the optimal combination of departmental leadership and qualified personnel from the respective department to select in assembling the safety risk assessment team.

The various hazard types can also be categorized by subcategory for each type. For example, organizational hazards can be subcategorized into resourcing, procedural, training or supervisory hazards. Each of the subcategories implies different types of mitigation strategies and potentially affect overall agency resources through varying costs for implementation. Technical hazards can be subcategorized into operational, maintenance, design and equipment. Additionally, environmental hazards can be subcategorized into weather and natural, which is always a factor for every operation.

## **II. Safety Risk Assessment – 673.25(c)**

As part of the new SRM process, El Metro has developed methods to assess the likelihood and severity of the consequences of identified hazards, and prioritizes the hazards based on the safety risk. The process continues the use of the Risk Register described in the previous section to address the next two components.

To accurately assess a risk, El Metro may need to perform an investigation. El Metro currently investigates accidents or crashes in accordance to the *LTMI Employee Accident / Incident Investigation and Reporting Standard Operating Procedures SOP-AIIP-201* (Appendix A) but will need to develop a full investigation procedure to inform the SRM process. The investigation procedure will start with *LTMI Employee Accident / Incident Investigation and Reporting Standard Operating Procedures SOP-AIIP-201* and the framework found in the *General Rules, Regulations and Policies Employee Handbook* and will be developed to cover all risk assessment. Once fully developed, the document will become the



Investigation SOP. The SOP will include accident investigation procedures as well as risk investigation procedures. These procedures will be used to investigate risks identified from multiple sources including the ESRP.

Safety risk is based on an assessment of the likelihood of a potential consequence and the potential severity of the consequences in terms of resulting harm or damage. The risk assessment also considers any previous mitigation efforts and the effectiveness of those efforts. The results of the assessment are used to populate the third and fourth components of the Risk Register as presented in Figure 5.

**FIGURE 5: SAFETY RISK ASSESSMENT STEPS IN POPULATING THE RISK REGISTER**

Hazard	Type	Likelihood	Consequence	Resolution

The risk assessment is conducted by the CSO and their risk management team through the safety compliance committee supplemented by qualified personnel from the respective department or section to which the risk applies. The process employs a safety risk matrix, similar to the one presented in Figure 6, that allows the safety team to visualize the assessed likelihood and severity, and to help decision-makers understand when actions are necessary to reduce or mitigate safety risk.

**FIGURE 6: SAFETY RISK ASSESSMENT MATRIX**

RISK ASSESSMENT MATRIX				
SEVERITY LIKELIHOOD	Catastrophic (1)	Critical (2)	Marginal (3)	Negligible (4)
Frequent (A)	High	High	High	Medium
Probable (B)	High	High	Medium	Medium
Occasional (C)	High	Medium	Medium	Low
Remote (D)	Medium	Medium	Low	Low
Improbable (E)	Medium	Low	Low	Low

Although the current version of the matrix relies heavily on the examples and samples that are listed on the PTASP Technical Assistance Center website, lessons learned from the implementation process during the coming years will be used to customize the matrix that El Metro will use to address our unique operating realities and leadership guidance.

The Risk Assessment Matrix is an important tool. If a risk is assessed and falls within one of the red zones, the risk is determined to be unacceptable under existing circumstances. This determination means that management must take action to mitigate the situation. This is the point in the process when SRMs are developed. If the risk is assessed and falls within one of the yellow zones, the risk is determined to be acceptable, but monitoring is necessary. If the risk falls within one of the green zones, the risk is acceptable under the existing circumstances.

Once a hazard's likelihood and severity have been assessed, the CSO enters the hazard assessment into the Risk Register that is used to document the individual hazard and the type of risk it represents. This information is used to move to the next step, which is hazard mitigation.

### III. Safety Risk Mitigation – 673.25(d)

The El Metro *Safety Policy* (Appendix A) contains a list of Basic Safety Rules that help to mitigate potential risks that may be present in the day-to-day operations of the agency. This list includes rules such as:

- All personnel will be required to attend safety meetings;
- Warning signs, barricades, and tags will be used to the fullest extent and shall be obeyed; and
- Horseplay on the jobsite is strictly prohibited.

El Metro also has several SOPs/policies/programs in place to help mitigate and prevent potential risks. These include, but are not limited to:

- Aerial Platform and Scissor Lift SOP;
- Powered Industrial Truck SOP;
- Electrical Safety Program; and
- Personal Protective Equipment SOP.

Over the next year, LTMI will hold staff meetings to discuss the Safety Risk Mitigation Process and Procedures. LTMI will provide Instruction-Led Training on Safety Risk Mitigation Process and Procedures to all key personnel and Department Heads. PTASP Technical Assistance Center Webinars will also be presented on respective topics. The process will also be presented to all employees and the Union.

In addition, as part of the *Employee Safety Reporting Program* (Appendix A), El Metro management and supervisors review all injury and illness documentation annually to analyze occurrences, identify trends, and plan courses of corrective action.

Upon completion of the risk assessment, the CSO, Safety and Training Coordinator and subject matter experts continue populating the Risk Register by identifying mitigations or strategies necessary to reduce the likelihood and/or severity of the consequences. The goal of this step is to avoid or eliminate

the hazard or, when elimination is not likely or feasible, to reduce the assessed risk rating to an acceptable level (Figure 7). However, mitigations do not typically eliminate the risk entirely.

FIGURE 7: RISK REGISTER MITIGATION COMPONENT

Hazard	Type	Likelihood	Consequence	Resolution

To accomplish this objective, the CSO, through the risk management team, works with qualified personnel from the respective department or section to which the risk applies. The risk management team then conducts a brainstorming exercise to elicit feedback from staff and supervisors with the highest level of expertise in the components of the hazard.

Documented risk resolution and hazard mitigation activities from previous Risk Register entries and the resolution's documented level of success at achieving the desired safety objectives may also be reviewed and considered in the process. If the hazard is external (e.g., roadway construction by an outside agency) information and input from external actors or experts may also be sought to take advantage of all reasonably available resources and avoid any unintended consequences.

Once a mitigation strategy is selected and adopted, the strategy is assigned to an appropriate staff member or team for implementation. The assigned personnel and the personnel's specific responsibilities are entered into the Risk Register. Among the responsibilities of the mitigation team leader is the documentation of the mitigation effort, including whether the mitigation was carried out as designed and whether the intended safety objectives were achieved. This information is recorded in the appendix to the Risk Register for use in subsequent SA activities and to monitor the effectiveness of the SRM program.

## B. Safety Assurance – 673.27 (a)

Safety Assurance means processes within the El Metro Safety Management System that function to ensure a) the implementation and effectiveness of safety risk mitigation, and b) El Metro meets or exceeds our safety objectives through the collection, measurement, analysis and assessment of information.

SA helps to ensure early identification of potential safety issues. SA also ensures that safeguards are in place and are effective in meeting critical El Metro safety objectives and contribute towards SPTs.

## I. Safety Performance Monitoring and Measuring – 673.27 (b)

As the first step in the El Metro SA program, El Metro collects and monitors data on safety performance indicators through a variety of mechanisms described in the following sections. Safety performance indicators can provide early warning signs about safety risks. El Metro currently relies primarily on lagging indicators representing negative safety outcomes that should be avoided or mitigated in the future. However, initiatives are underway to adopt a more robust set of leading indicators that monitor conditions that are likely to contribute to negative outcomes in the future. In addition to the day-to-day monitoring and investigation procedures detailed below, El Metro will review and document the safety performance monitoring and measuring processes as part of the annual update of this ASP.

### MONITORING COMPLIANCE AND SUFFICIENCY OF PROCEDURES – 673.27 (B)(1)

El Metro monitors our system for personnel compliance with operations and maintenance procedures and also monitors these procedures for sufficiency in meeting safety objectives. A list of documents describing the safety related operations and maintenance procedures cited in this ASP is provided in Appendix A of this document.

Supervisors monitor employee compliance with El Metro standard operating procedures through direct observation and review of information from internal reporting systems such as the *Employee Safety Reporting Program* and *Customer Comment/Complaint Procedure and Record Retention Policy* (Appendix A) from both employees and customers.

El Metro addresses non-compliance with standard procedures for operations and maintenance activities through a variety of actions, including revision to training materials and delivery of employee and supervisor training if the non-compliance is systemic. If the non-compliance is situational, then activities may include supplemental individualized training, coaching, and heightened management oversight, among other remedies.

Sometimes personnel are fully complying with the procedures, but the operations and maintenance procedures are inadequate and pose the risk of negative safety outcomes. In this case, the cognizant person submits the deficiency or description of the inadequate procedures to the SRM process. Through the SRM process, the SRM team will then evaluate and analyze the potential organizational hazard and assign the identified hazard for mitigation and resolution, as appropriate. The SRM team will also conduct periodic self-evaluation and mitigation of any identified deficiencies in the SRM process itself.

### MONITORING OPERATIONS – 673.27(B)(2)

Department Heads are required to monitor investigation reports of safety events and SRM resolution reports to monitor the department's operations to identify any safety risk mitigations that may be ineffective, inappropriate, or not implemented as intended. If it is determined that the safety risk mitigation did not bring the risk to an acceptable level or otherwise failed to meet safety objectives, then the Department Head resubmits the safety risk/hazard to the SRM process. The CSO will work with

the Safety & Training Coordinator and qualified personnel from the respective department to re-analyze the hazard and consequences and identify additional mitigation or alternative approaches to implementing the mitigation.

## **II. Safety Event Investigation – 673.27(B)(3)**

El Metro currently conducts investigations of safety events. From an SA perspective, the objective of the investigation is to identify causal factors of the event and to identify actionable strategies that El Metro can employ to address any identifiable organizational, technical or environmental hazard at the root cause of the safety event.

El Metro uses the After Accident Investigation procedure located in the *General Rules, Regulations and Policies Employee Handbook* and the *LTM Employee Accident / Incident Investigation and Reporting Standard Operating Procedures SOP-AIIP-201* to identify safety and operational risks based on individual assets.

Safety Event Investigations that seek to identify and document the root cause of an accident or other safety event are a critical component of the SA process because they are a primary resource for the collection, measurement, analysis and assessment of information. El Metro gathers a variety of information for identifying and documenting root causes of accidents and incidents, including but not limited to:

1. Stop, identify yourself and Radio Dispatch immediately giving them the location and your bus number. (A Supervisor or Dispatcher will call the Policy and Ambulance when necessary). Employees are required to report all accidents/incidents within five (5) minutes after the occurrence. Dispatch will notify the Safety and Training Coordinator of the accident/incident.
2. Assist the injured person, but do not move them except to avoid danger. Use extreme care and protect yourself avoiding contact with bodily fluids.
3. Secure full names, addresses, and telephone numbers of:
  - a. Passengers
  - b. Other driver
  - c. Injured persons
  - d. Witnesses
  - e. Transporting motorists
4. Make a sketch showing names of streets, positions of cars, and direction of traffic at the time of the accident.
5. Do not argue, accuse, nor give statements to the media or bystanders.
6. Do not discuss the mechanical condition of the vehicle with anyone except Company Supervisory personnel
7. Refer the operator for required drug and alcohol testing in compliance with 49 CFR § 655.44 Post-accident testing, if the safety event meets the definition of accident in 49 CFR § 655.4.

8. Dispatcher on duty will give the Operator an incident report to complete before the Operator leaves that day. Dispatcher will transmit the Operator's report to the Safety & Training Coordinator.
9. The CSO and the Safety & Training Coordinator, working with qualified personnel from the respective department, evaluate the incident reports and other available information to determine the root cause of the accident/event. Follow up with driver or other cognizant parties may be necessary to elicit additional information.
10. The CSO identifies any hazards noted in the incident report and refers those hazards to the SRM process.

After the accident has been cleared up by law enforcement, an employee shall not leave the scene until released by Dispatcher or Supervisor. It is extremely important that the employee creates a complete, specific, and legible report. The employee must complete and submit the report of the accident by the end of his/her work schedule. A complete, specific, and legible report must be made for every accident or incident, however slight, which occurs on or near a company vehicle in case of a passenger or pedestrian accident; even if the person involved declines to give his name or states that he is unhurt, a full report should be made.

The El Metro *Drug and Alcohol Policy* (Appendix A) requires that any accidents resulting in a fatality will subject any involved El Metro employee to post-accident drug and alcohol testing. The policy also provides the conditions under which employees will be subject to post-accident drug and alcohol testing following an accident resulting in no fatalities.

In addition, the *General Rules, Regulations and Policies Employee Handbook* contains procedures for how to react to and report other more specific incidents, such as hit and runs, fires on vehicles, and disabled vehicles.

#### MONITORING INTERNAL SAFETY REPORTING PROGRAMS – 673.27(B)(4)

As a primary part of the internal safety reporting program, our agency monitors information reported through the ESRP. When a report originating through the complaint process documents a safety hazard, the supervisor submits the hazards identified through the internal reporting process, including previous mitigation in place at the time of the safety event. The supervisor submits the hazard report to the SRM process to be analyzed, evaluated and, if appropriate, assigned for mitigation/resolution.

#### OTHER SAFETY ASSURANCE INITIATIVES

Because leading indicators can be more useful for safety performance monitoring and measurement than lagging indicators, El Metro is undertaking efforts to implement processes to identify and monitor more leading indicators or conditions that have the potential to become or contribute to negative safety outcomes. This may include trend analysis of environmental conditions through monitoring National Weather Service data; monitoring trends toward or away from meeting the identified SPTs; or other indicators as appropriate.

## *C. Safety Promotion – 673.29*

Management support is essential to developing and implementing SMS. SP includes all aspects of how, why, when and to whom management communicates safety related topics. SP also includes when and how training is provided. The following sections outline both the safety competencies and training that El Metro will implement and how safety related information will be communicated.

### *I. Safety Competencies and Training – 673.29(a)*

El Metro provides comprehensive training to all employees regarding each employee's job duties and general responsibilities. This training includes safety responsibilities related to the employee's position. In addition, regular Operations and Maintenance safety meetings are held to ensure that safety related information is relayed to the key members of our agency's safety processes.

As part of SMS implementation, El Metro will be conducting the following activities:

- Conduct a thorough review of all current general staff categories (administrative, driver, supervisor, mechanic, maintenance, etc.) and the respective staff safety related responsibilities.
- Assess the training requirements spelled out in 49 CFR Part 672 and the various courses required for different positions. (El Metro is not subject to the requirements under 49 CFR Part 672 but will review the training requirements to understand what training is being required of other larger agencies in the event these trainings might be useful).
- Assess the training material available on the FTA PTASP Technical Assistance Center website.
- Review other training material available from industry sources such as the Community Transportation Association of America and the American Public Transportation Association websites.
- Develop a set of competencies and trainings required to meet the safety related activities for each general staff category.
- Develop expectations for ongoing safety training and safety meeting attendance.
- Develop a training matrix to track progress on individuals and groups within the organization.
- Adjust job notices associated with general staff categories to ensure that new personnel understand the safety related competencies and training needs and the safety related responsibilities of the job.
- Include refresher training in all trainings and apply it to agency personnel and contractors.

LTMI SMS implementation is important and the CSO is the resource person for providing a corporate perspective on LTMI's approach to safety management. OSHA, FTA, TXDOT and SMS training will be provided to key personnel and all Department Heads. Courses, conferences or training seminars will include but are not limited to:

- Defensive driver training
- Behind-the-wheel training
- On-the-job training for maintenance functions
- Occupational safety training
- Informal staff meetings
- Webinars
- Formal certification from accredited institutions
- Other forms of training required for employees and contractors designated as “directly responsible for safety”

Safety Management training topics may include:

**A. Initial Safety Training for All Staff**

1. Basic principles of safety management including the integrated nature of SMS, risk management, safety culture, etc.
2. Corporate safety goals and objectives, safety policy, and safety standards
3. Importance of complying with the safety policy and SMS procedures, and the approach to disciplinary actions for different safety issues
4. Organizational structure, roles and responsibilities of staff in relation to safety
5. Transit agency’s safety record, including areas of systemic weakness
6. Requirements for ongoing internal assessment of organization safety performance (e.g. employee surveys, safety audits, and assessments)
7. Reporting accidents, incidents, and perceived hazards
8. Lines of communication for safety managers
9. Feedback and communication methods for the dissemination of safety information
10. Safety promotion and information dissemination

**B. Safety Training for Operations and Maintenance Personnel**

1. Unique hazards facing operational personnel
2. Seasonal safety hazards and procedures (e.g. winter operations)
3. Procedures for hazard reporting
4. Procedures for reporting safety events (accidents and incidents)
5. Emergency procedures

**C. Safety Training for Key Personnel and Department Heads**

1. Principles of the SMS
2. Management responsibilities and accountabilities for safety
3. Legal issues (e.g. liability)



**D. Training for the Chief Safety Officer and Safety & Training Coordinator**

1. Familiarization with different transit modes, types of operation, routes, etc.
2. Understanding the role of human performance in safety event causation and prevention
3. Operation of the SMS
4. Investigating safety events
5. Crisis management and emergency response planning
6. Safety promotion
7. Communication skills
8. Performing safety audits and assessments
9. Monitoring safety performance
10. National Transit Database (NTD) safety event reporting requirements

**II. Safety Communication – 673.29(b)**

El Metro regularly communicates safety and safety performance information throughout our agency's organization that, at a minimum, conveys information on hazards and safety risks relevant to employees' roles and responsibilities and informs employees of safety actions taken in response to reports submitted through the ESRP (noted in Section 3.A.I) or other means.

Over the next year, LTMI will have a staff meeting to discuss Safety Communication Processes and Methods. PTASP TAC Webinars will be presented on respective topics and all approved Processes and methods will be provided to the Union.

Methods of communication are:

- New Employee Orientation;
- Driver's Training;
- Internal Marketing Strategies;
- Instructor-Led Training;
- Safety Meetings;
- El Metro Toolbox Talk (Safety Bulletin);
- Safety Planning Advisory Committee;
- Staff Meetings;
- Department bulletin boards;
- Employee handbooks;
- Safety plans and strategies are communicated throughout the organization to all personnel; and
- Significant events and investigation outcomes associated with the organization are communicated to all personnel, including contracted organizations where appropriate.

Safety plans and strategies are communicated throughout the organization to all personnel. Organizational roles and duties in SMS are presented and explained to SMS key staff. Significant events and investigation outcomes associated with the LTMI are communicated to all personnel, contracted organizations and the Union where appropriate.

El Metro reports any safety related information to the Laredo Mass Transit Board at their regular meetings and will begin including safety performance information. In addition, El Metro holds regularly scheduled meetings with drivers to ensure that any safety related information is passed along that would affect the execution of the drivers' duties. El Metro also posts safety related and other pertinent information in a common room for all employees at all worksites and holds monthly safety and training meetings with all employees.

El Metro will begin systematically collecting, cataloging, and, where appropriate, analyzing and reporting safety and performance information to all staff. To determine what information should be reported, how the information should be reported and to whom, El Metro will answer the following questions:

- What information does this individual need to do their job?
- How can we ensure the individual understands what is communicated?
- How can we ensure the individual understands what action must be taken as a result of the information?
- How can we ensure the information is accurate and kept up-to-date?
- Are there any privacy or security concerns to consider when sharing information? If so, what should we do to address these concerns?

In addition, El Metro will review our current communications strategies and determine whether others are needed. As part of this effort, El Metro has conducted, and will continue to conduct, a Safety Culture Survey to understand how safety is perceived in the workplace and what areas El Metro should be addressing to fully implement a safety culture at our agency.

## 5. APPENDIX A

TABLE 8: PTASP SUPPORTING DOCUMENTS

File Name	Revision Date
Accidents Incidents 2018.xlsx	2018
CIRCULATOR C1 Bifold.pdf	
COA 2015 Report.pdf	November, 2005
Customer Reporting Procedures.pdf	July, 2018
Drug and Alcohol Policy.pdf	1/15/2019
El Metro 2016 Transit Develop Appendix C.pdf	2016
El Metro 2016 Transit Development Plan.pdf	2016
El Metro 2016 Transit Development Plan_Appendix A.pdf	2016
El Metro 2016 Transit Development Plan_Appendix B.pdf	2016
El Metro 2016 Transit Development Plan_Chapter 1.pdf	2016
El Metro 2016 Transit Development Plan_Chapter 2.pdf	2016
El Metro 2016 Transit Development Plan_Chapter 3.pdf	2016
El Metro 2016 Transit Development Plan_Chapter 4.pdf	2016
El Metro 2016 Transit Development Plan_Chapter 5.pdf	2016
El Metro 2016 Transit Development Plan_Chapter 6.pdf	2016
El Metro 2016 Transit Development Plan_Chapter 7.pdf	2016

File Name	Revision Date
El Metro 2016 Transit Development Plan_Chapter 8.pdf	2016
El Metro 2016 Transit Development Plan_Chapter 9.pdf	2016
El Metro 2016 Transit Development Plan_Executive Summary.pdf	2016
El Metro Overview.docx	
El Metro Safety Policy 9 19 2019.doc	9/19/2019
El Metro TAMP_Appendix A.pdf	
El Metro TAMP_Appendix B.pdf	
El Metro TAMP_Chapter 1.pdf	January, 2017
El Metro TAMP_Chapter 2.pdf	January, 2017
El Metro TAMP_Chapter 3.pdf	January, 2017
El Metro TAMP_Chapter 4.pdf	January, 2017
El Metro TAMP_Chapter 5.pdf	January, 2017
El Metro TAMP_Combined.pdf	January, 2017
El Metro Vehicle Listing FY 18-19_Updated 6-20.19_Granados Copy.xlsx	6/20/2019
Employee Handbook 8-08-2017 final.docx	July, 2017
Ethics and Compliance Program.pdf	7/21/2017
FTA 2018 TRIENNIAL FINAL REPORT.pdf	6/11/2018
Information Security Incident Response Plan.pdf	4/22/2019
Job Descriptions.pdf	
Laredo EL Metro Asset Inventory 022717.xlsm	2/27/2017

File Name	Revision Date
Laredo Mass Transit Board.docx	
Laredo Transit Management and Teamsters 657 2018-21 CBA.pdf	10/1/2018
Laredo Transit Management, Inc - 2017 Agency Profile.pdf	2017
Laredo_MPO_Boundary_Map.pdf	December, 2007
LTMI Aerial Platform and Scissor Lift SOP_Rev 9-19-19.docx	10/8/2019
LTMI Bloodborne Exposure Control_Rev_9-19-19.doc	June, 2017
LTMI Electrical Safety Program_9-20-19.docx	10/8/2019
LTMI Emergency Action Plan_9-20-19.docx	10/8/2019
LTMI Employee Accident Incident Investigation and Reporting SOP.docx	3/18/2020
LTMI_EMPLOYEE_SAFETY_REPORTING_PROGRAM 3 9 2020.docx	3/9/2020
LTMI Fall Protection Policy_9-20-19.docx	10/8/2019
LTMI Funding Sources.docx	2019
LTMI Hazard Communication_9-20-19.docx	1/1/2015
LTMI Lockout Tagout_9-20-19.docx	1/27/2006
LTMI Powered Industrial Truck SOP_Rev 9-19-19.docx	9/19/2019
LTMI PPE Policy_Rev 9-19-19.docx	10/8/2019
LTMI Purchasing Policy_Revised Oct 2, 2018_Tri2018_PDF.pdf	10/2/2018

File Name	Revision Date
LTMI Respiratory Protection Program_9-20-19.docx	10/8/2019
LTMI_SAFETY_PERFORMANCE_2 10 2020.xlsx	2/10/2020
Maintenance & Facility Plan_Updated 8-8-18_pdf Format (1).pdf	8/8/2018
MOU- LAREDO MPO-TXDOT-TRANSIT - 2018- EXECUTED.pdf	2/20/2018
MPO.pdf	
EL_METRO_ORGANIZATIONAL_CHART 3 26 2020.docx	3/26/2020
Performance Measures.pdf	
Route 1 Bifold.pdf	
Route 2A Bifold.pdf	
Route 2B Bifold.pdf	
Route 3 Bifold.pdf	
Route 4 Bifold.pdf	
Route 5 Bifold.pdf	
Route 6 Bifold.pdf	
Route 7 Bifold.pdf	
Route 8A Bifold.pdf	
Route 8B Bifold.pdf	
Route 9 Bifold.pdf	
Route 10 Bifold.pdf	
Route 11 Bifold.pdf	
Route 12A Bifold.pdf	
Route 12B Bifold.pdf	
Route 13 Bifold.pdf	
Route 14 Bifold.pdf	
Route 15 Bifold.pdf	
Route 16 Bifold.pdf	
Route 17 Bifold.pdf	
Route 18 Bifold.pdf	
Route 19 Bifold.pdf	
Route 20 Bifold.pdf	
Safety Inspections Audits.pdf	

File Name	Revision Date
LTFI SAFETY MANAGEMENT POLICY.docx	3/17/2020
SPAC Meetings.pdf	
SPAC MEMBERSHIP 5 22 2017 (3).docx	5/24/2017
TAPTCO Training.pdf	

## A. Glossary of Terms

**Accident:** means an event that involves any of the following: a loss of life; a report of a serious injury to a person; a collision of transit vehicles; an evacuation for life safety reasons; at any location, at any time, whatever the cause.

**Accountable Executive (typically the highest executive in the agency):** means a single, identifiable person who has ultimate responsibility for carrying out the SMS of a public transportation agency, and control or direction over the human and capital resources needed to develop and maintain both the agency's PTASP, in accordance with 49 U.S.C. 5329(d), and the agency's TAM Plan in accordance with 49 U.S.C. 5326.

**Agency Leadership and Executive Management:** means those members of agency leadership or executive management (other than an Accountable Executive, CSO, or SMS Executive) who have authorities or responsibilities for day-to-day implementation and operation of an agency's SMS.

**Chief Safety Officer (CSO):** means an adequately trained individual who has responsibility for safety and reports directly to a transit agency's chief executive officer, general manager, president, or equivalent officer. A CSO may not serve in other operational or maintenance capacity, unless the CSO is employed by a transit agency that is a small public transportation provider as defined in this part, or a public transportation provider that does not operate a rail fixed guideway public transportation system.

**Corrective Maintenance:** Specific, unscheduled maintenance typically performed to identify, isolate, and rectify a condition or fault so that the failed asset or asset component can be restored to a safe operational condition within the tolerances or limits established for in-service operations.

**Equivalent Authority:** means an entity that carries out duties similar to that of a Board of Directors, for a recipient or subrecipient of FTA funds under 49 U.S.C. Chapter 53, including sufficient authority to review and approve a recipient or subrecipient's PTASP.

**Event:** means an accident, incident, or occurrence.

**Federal Transit Administration (FTA):** means the Federal Transit Administration, an operating administration within the United States Department of Transportation.

**Hazard:** means any real or potential condition that can cause injury, illness, or death; damage to or loss of the facilities, equipment, rolling stock, or infrastructure of a public transportation system; or damage to the environment.

**Incident:** means an event that involves any of the following: a personal injury that is not a serious injury; one or more injuries requiring medical transport; or damage to facilities, equipment, rolling stock, or infrastructure that disrupts the operations of a transit agency.

**Investigation:** means the process of determining the causal and contributing factors of an accident, incident, or hazard, for the purpose of preventing recurrence and mitigating risk.

**Key staff:** means a group of staff or committees to support the Accountable Executive, CSO, or SMS Executive in developing, implementing, and operating the agency's SMS.

**Major Mechanical Failures:** means failures caused by vehicle malfunctions or subpar vehicle condition which requires that the vehicle be pulled from service.

**National Public Transportation Safety Plan (NSP):** means the plan to improve the safety of all public transportation systems that receive Federal financial assistance under 49 U.S.C. Chapter 53.

**Occurrence:** means an event without any personal injury in which any damage to facilities, equipment, rolling stock, or infrastructure does not disrupt the operations of a transit agency.

**Operator of a Public Transportation System:** means a provider of public transportation as defined under 49 U.S.C. 5302(14).

**Passenger:** means a person, other than an operator, who is on board, boarding, or alighting from a vehicle on a public transportation system for the purpose of travel.

**Performance Measure:** means an expression based on a quantifiable indicator of performance or condition that is used to establish targets and to assess progress toward meeting the established targets.

**Performance Target:** means a quantifiable level of performance or condition, expressed as a value for the measure, to be achieved within a time period required by the FTA.

**Preventative Maintenance:** means regular, scheduled, and/or recurring maintenance of assets (equipment and facilities) as required by manufacturer or vendor requirements, typically for the purpose of maintaining assets in satisfactory operating condition. Preventative maintenance is conducted by providing for systematic inspection, detection, and correction of anticipated failures either before they occur or before they develop into major defects. Preventative maintenance is maintenance, including tests, measurements, adjustments, and parts replacement, performed specifically to prevent



faults from occurring. The primary goal of preventative maintenance is to avoid or mitigate the consequences of failure of equipment.

**Public Transportation Agency Safety Plan (PTASP):** means the documented comprehensive agency safety plan for a transit agency that is required by 49 U.S.C. 5329 and this part.

**Risk:** means the composite of predicted severity and likelihood of the potential effect of a hazard.

**Risk Mitigation:** means a method or methods to eliminate or reduce the effects of hazards.

**Road Calls:** means specific, unscheduled maintenance requiring either the emergency repair or service of a piece of equipment in the field or the towing of the unit to the garage or shop.

**Safety Assurance (SA):** means the process within a transit agency's SMS that functions to ensure the implementation and effectiveness of safety risk mitigation and ensures that the transit agency meets or exceeds its safety objectives through the collection, analysis, and assessment of information.

**Safety Management Policy (SMP):** means a transit agency's documented commitment to safety, which defines the transit agency's safety objectives and the accountabilities and responsibilities of the agency's employees regarding safety.

**Safety Management System (SMS):** means the formal, top-down, data-driven, organization-wide approach to managing safety risk and assuring the effectiveness of a transit agency's safety risk mitigation. SMS includes systematic procedures, practices, and policies for managing risks and hazards.

**Safety Management System (SMS) Executive:** means a CSO or an equivalent.

**Safety Objective:** means a general goal or desired outcome related to safety.

**Safety Performance:** means an organization's safety effectiveness and efficiency, as defined by safety performance indicators and targets, measured against the organization's safety objectives.

**Safety Performance Indicator:** means a data-driven, quantifiable parameter used for monitoring and assessing safety performance.

**Safety Performance Measure:** means an expression based on a quantifiable indicator of performance or condition that is used to establish targets and to assess progress toward meeting the established targets.

**Safety Performance Monitoring:** means activities aimed at the quantification of an organization's safety effectiveness and efficiency during service delivery operations, through a combination of safety performance indicators and safety performance targets.

**Safety Performance Target (SPT):** means a quantifiable level of performance or condition, expressed as a value for a given performance measure, achieved over a specified timeframe related to safety management activities.

**Safety Promotion (SP):** means a combination of training and communication of safety information to support SMS as applied to the transit agency's public transportation system.

**Safety Risk:** means the assessed probability and severity of the potential consequence(s) of a hazard, using as reference the worst foreseeable, but credible, outcome.

**Safety Risk Assessment:** means the formal activity whereby a transit agency determines SRM priorities by establishing the significance or value of its safety risks.

**Safety Risk Management (SRM):** means a process within a transit agency's Safety Plan for identifying hazards, assessing the hazards, and mitigating safety risk.

**Safety Risk Mitigation:** means the activities whereby a public transportation agency controls the probability or severity of the potential consequences of hazards.

**Safety Risk Probability:** means the likelihood that a consequence might occur, taking as reference the worst foreseeable, but credible, condition.

**Safety Risk Severity:** means the anticipated effects of a consequence, should the consequence materialize, taking as reference the worst foreseeable, but credible, condition.

**Serious Injury:** means any injury which:

- Requires hospitalization for more than 48 hours, commencing within seven days from the date that the injury was received;
- Results in a fracture of any bone (except simple fractures of fingers, toes, or nose);
- Causes severe hemorrhages, nerve, muscle, or tendon damage;
- Involves any internal organ; or
- Involves second- or third-degree burns, or any burns affecting more than 5 percent of the body surface.

**Small Public Transportation Provider:** means a recipient or subrecipient of Federal financial assistance under 49 U.S.C. 5307 that has one hundred (100) or fewer vehicles in peak revenue service and does not operate a rail fixed guideway public transportation system.

**State:** means a State of the United States, the District of Columbia, or the Territories of Puerto Rico, the Northern Mariana Islands, Guam, American Samoa, and the Virgin Islands.

**State of Good Repair:** means the condition in which a capital asset is able to operate at a full level of performance.

**State Safety Oversight Agency:** means an agency established by a State that meets the requirements and performs the functions specified by 49 U.S.C. 5329(e) and the regulations set forth in 49 CFR part 674.

**Transit Agency:** means an operator of a public transportation system.

**Transit Asset Management (TAM) Plan:** means the strategic and systematic practice of procuring, operating, inspecting, maintaining, rehabilitating, and replacing transit capital assets to manage their performance, risks, and costs over their life cycles, for the purpose of providing safe, cost-effective, and reliable public transportation, as required by 49 U.S.C. 5326 and 49 CFR part 625.

**Vehicle Revenue Miles (VRM):** means the miles that vehicles are scheduled to or actually travel while in revenue service. Vehicle revenue miles include layover/recovery time and exclude deadhead; operator training; vehicle maintenance testing; and school bus and charter services.

## *B. Additional Acronyms Used*

**ASP:** Agency Safety Plan

**El Metro:** Laredo Transit Management, Inc./El Metro Transit, City of Laredo, Texas

**ESRP:** Employee Safety Reporting Program

**FAST Act:** Fixing America's Surface Transportation Act

**LTMI:** Laredo Transit Management, Inc.

**MAP-21:** Moving Ahead for Progress in the 21<sup>st</sup> Century Act

**MOU:** Memorandum of Understanding

**MPO:** Metropolitan Planning Organization

**NTD:** National Transit Database

**OSHA:** Occupational Safety and Health Administration

**SOP:** Standard Operating Procedure

**SPAC:** Safety Planning Advisory Committee

**TxDOT:** Texas Department of Transportation

## 6. APPENDIX B

### A. City Council/Board Minutes or Resolution

#### RESOLUTION NO. 2020-RT-06

AUTHORIZING THE LAREDO MASS TRANSIT BOARD TO APPROVED THE TEXAS DEPARTMENT OF TRANSPORTATION SPONSORED PUBLIC TRANSPORTATION AGENCY SAFETY PLAN AND ESTABLISHING SAFETY PERFORMANCE TARGETS FOR THE LAREDO TRANSIT MANAGEMENT INC. (LTMI).

**WHEREAS**, Safety is a core business function of all public transportation providers and should be systematically applied to every aspect of service delivery, as the Federal Transit Administration (FTA) has adopted the principles and methods of Safety Management Systems (SMS) as the basis for enhancing the safety of public transportation in the United States; and

**WHEREAS**, On July 19, 2018 the FTA published the Public Transportation Agency Safety Plan (PTASP) Final Rule, 49 CFR Part 673, which took effect July 19, 2019 requiring all FTA Section 5307 recipient transit agencies to, within one calendar year after July 19, 2019, establish a PTASP that meets the requirements of Part 673; and

**WHEREAS**, The PTASP, and subsequent updates, must be signed by the Accountable Executive and approved by the agency's Board of Directors, or an Equivalent Authority; and

**WHEREAS**, PTASP must document the processes and activities related to Safety Management System (SMS) implementation and include performance targets based on the safety performance measures established under the National Public Transportation Safety Plan, with those targets being shared with the Laredo-Webb County Area Metropolitan Planning Organization formerly known as the Laredo Urban Transportation Study Metropolitan Planning Organization (LUTS) and the Texas Department of Transportation (TxDOT); and

**WHEREAS**, The initial PTASP for El Metro Transit has been drafted by TxDOT per 49 CFR 673.11(d) and will remain in effect until the Laredo Transit Management Inc. (LTMI) has drafted the next version; and

**WHEREAS**, El Metro Transit is dedicated to ensuring that the necessary processes are in place to accomplish both enhanced safety at the local level and the goals of the NSP, as the SMS helps organizations improve upon their safety performance by supporting the institutionalization of beliefs, practices, and procedures for identifying, mitigating, and monitoring safety risks;

**NOW THEREFORE, BE IT RESOLVED BY THE MASS TRANSIT BOARD OF THE CITY OF LAREDO THAT:**

**Section 1.** the Laredo Mass Transit Board approves this PTASP and the tenets of SMS including a Safety Management Policy (SMP) and the processes for Safety Risk Management (SRM), Safety Assurance (SA), and Safety Promotion (SP), per 49 U.S.C. 5329(d)(1)(A); and as

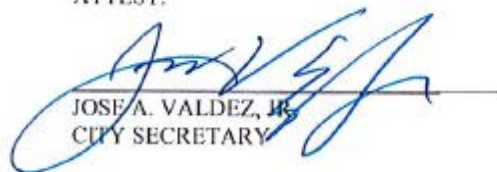
**Section 2.** Safety has always been a primary function at LTMI, this PTASP lays out a process to fully implement and review an SMS on a yearly and ongoing basis in order to continue compliance with the PTASP final rule.

**PASSED BY THE MASS TRANSIT BOARD AND APPROVED BY THE MAYOR ON THIS THE**

4th DAY OF May, 2020.

  
PETE SAENZ  
MAYOR

ATTEST:

  
JOSE A. VALDEZ, JR.  
CITY SECRETARY



APPROVED AS TO FORM:

BY   
for KRISTINA LAUREL HALE  
CITY ATTORNEY