

Oregon Department of Transportation State Safety Oversight Agency 2025 Annual Safety Report



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Summary

The State Safety Oversight Agency (SSOA or SSO), housed within the Oregon Department of Transportation's (ODOT) Commerce and Compliance Division (CCD), is responsible for safety oversight of the light rail, streetcar, and trolley systems within Oregon, all of which are termed Rail Fixed Guideway Public Transportation Systems (RFGPTS). RFGPTS are managed by rail transit agencies (RTA) with whom the SSOA communicates. These are regulated separately and distinctly from heavy rail, such as Amtrak or the Westside Express Service (WES) Commuter Rail. Currently, there are two RTAs that receive federal funding, placing them under federally mandated state oversight, as well as under state regulations. There are two smaller systems that do not receive federal funding, and therefore are subject only to state regulations. The Federal Transit Administration (FTA) provides funding for RTAs and for the SSOA and has promulgated regulations that require each SSOA to provide a written report about its activities throughout the previous calendar year to the Governor of its state and to the Boards or related positions at the RTAs, along with FTA.

Overview

Oregon is one of 32 states, including the District of Columbia and Puerto Rico, with a designated SSOA program. Through inspections of various types, audits, reviews, investigations, attendance at various meetings, and document review, the Oregon SSOA program oversees the safety of RFGPTS for compliance with 49 United States Code (U.S.C.) 5329(e), the Code of Federal Regulations (CFR) found in 49 CFR Parts 40, 655, 670, 671, 672, 673, and 674, as well as Oregon Revised Statutes (ORS) 824.045, Oregon Administrative Rules (OAR), Division 741, Chapter 60 (and Chapter 65, applicable only to the Astoria Riverfront Trolley (ART) and the Willamette Shore Trolley (WST)), and the Oregon SSO Program Standard.

The Tri-County Metropolitan Transportation District of Oregon (TriMet) light rail system, commonly referred to as MAX, and the Portland Streetcar (PSC), receive federal financial assistance, thereby placing them under federal and state jurisdiction and subject to both federal and state regulations. ART and WST do not receive federal financial assistance; they are subject to state (but not federal) oversight. This report focuses on those systems subject to federal regulations. Once a year, in accordance with 49 CFR 674.13(a)(7), the SSOA reports the status of the safety of each RFGPTS to the Governor, the FTA, and to the TriMet Board of Directors and the Portland City Council for Portland Streetcar.

Current Regulatory Environment

On November 15, 2021, President Biden signed into law the Bipartisan Infrastructure Law, (BIL) which amended FTA's safety program found at 49 U.S.C. 5329. Changes to 49 U.S.C. 5329(d) resulted in changes to 49 CFR Parts 673 and 674, and required minor to moderate changes to each RTA's Public Transportation Agency Safety Plan (PTASP), including the establishment of a safety committee convened by a joint-labor management process consisting of an equal number of frontline employee representatives and managers. The safety committee's responsibilities include:

- a) reviewing and approving the PTASP each year;
- b) identifying and recommending risk-based mitigations or strategies necessary to reduce the likelihood and severity of identified risks;
- c) developing strategies to minimize employees and riders to exposure of hazards and unsafe conditions as recommended by the Centers for Disease Control and Prevention or a State health authority, and
- d) establishing performance safety targets in alignment with the National Public Transportation Safety Plan.

There have been minor updates to both 49 CFR Parts 673 and 674. The most recent update, to 49 CFR part 674, occurred in 2024 and was effective as of January 1, 2025. That update clarified requirements and updated terminology across the related regulations. One of the changes made in that rulemaking was to modify or eliminate several existing terms to align across FTA regulations.

A new term added is "Safety Event," which is defined as "an unexpected outcome resulting in injury or death; damage to or loss of the facilities, equipment, rolling stock, or infrastructure of a public transportation system; or damage to the environment." Reportable safety events occurring on a RFGPTS that require two-hour notification to the SSOA and FTA include one or more of the following:

- (a) Fatality
- (b) Two or more injuries
- (c) Derailment
- (d) Collision resulting in one or more injuries
- (e) Collision between two rail transit vehicles
- (f) Collision resulting in disabling damage to a rail transit vehicle
- (g) Evacuation for life safety reasons
- (h) Unintended train movement

In order to include this new definition, the terms 'accident,' 'incident,' and 'occurrence' were

removed from the federal regulations. Although FTA deleted incident and occurrence, Oregon SSOA has decided to retain those definitions to assist in reporting and categorizing events.

The definition of an “Incident” means an event that involves any of the following:

- (a) All collisions involving an RTV (rail transit vehicle) that do not meet the threshold of a safety event.
- (b) Vandalism, theft, or damage to catenary, track or signal systems that result in cancellation of service, issuance of a slow order, or delays rail service more than 30 minutes.
- (c) Application of an emergency braking device that results in an irretrievable stop to avoid a safety event or collision.

The definition of an “Occurrence” means an event that involves any of the following:

- (a) Close calls/Near misses;
- (b) Unauthorized entry into a rail yard or rail operations facility or rail maintenance facility that results in a crime, vandalism, or theft; or
- (c) Violations of safety rules or safety policies

While in past reports the SSOA has shown statistics from year to year, due to the change in terminology in the federal regulations, that is not possible to do in this report; only 2025 is included. Beginning next year and thereafter SSOA will again be able to compare the stats.

In late 2022, FTA issued a special directive to each of the 31 (at that time) SSOAs that oversee RTAs. Special Directive No. 22-43, issued to Oregon SSOA on October 21, 2022, required it to develop and implement a risk-based inspection (RBI) program, as required by 49 U.S.C. 5329(k). The primary driver of an RBI is to focus oversight energies on the areas of highest risk at an RTA by using data provided, collected, and observed. Oregon SSOA had been conducting risk based inspections for several years, but in response to the Special Directive has enhanced its inspection program to meet the requirements of the RBI program required by FTA.

Within 2 years of the date of the Directive, SSOs were to submit to FTA documentation that demonstrated the SSOA has developed a risk-based inspection program in accordance with this Special Directive and the criteria set forth in U.S.C. §5329(k). Oregon SSOA completed that submission over several months and it was approved by FTA On March 4, 2025. One year after FTA approved the documentation, SSOs were required to submit documentation demonstrating that the SSOA had implemented the approved program for a minimum of six

months. Oregon SSOA submitted their implementation data on March 18, 2026. To date, SSOA has not received a response from FTA on its submission.

In the later part of 2024, FTA issued General Directive 24-1 regarding assaults on transit workers. It required the RTA to conduct a safety risk assessment to develop mitigations or strategies to reduce the likelihood and severity of such assaults, and then submit specific information to FTA within 90 days.

Also, near the end of 2024, FTA promulgated 49 CFR Part 671, addressing roadway worker protection (RWP). This rule establishes minimum safety standards for rail transit RWP to ensure the safe operation of public transportation systems and to prevent safety events, particularly fatalities and injuries to transit workers who may access the roadway in the performance of work.

The regulation requires that the RTAs' RWP program align with the requirements in the rule. It requires that the RTAs submit quarterly reports to the SSOA documenting compliance with and sufficiency of the RWP program. One of the initial requirements was for the RTAs to provide the SSOA with their completed RWP manual and an on-track safety (OTS) guide for review and approval. Both RTAs' plans were approved by the SSOA. Subsequently, the SSOA uploaded those documents to FTA, as required. No SSOs have received a response from FTA to those submissions.

As part of the RWP regulations, the SSOA is required to perform an annual audit of the RTA's RWP program. There is some discussion allowing such an audit to occur with the triennial review, but that change has not been formalized. In the meantime, the RWP audits this year will coincide with the triennial reviews to be conducted later this year.

Internal Safety Reviews (ISR)

RTAs must complete five (5) ISRs each year to evaluate the implementation, execution, compliance with, and effectiveness of its PTASP and its Emergency Preparedness and Response Plan (EPRP). These reviews are in addition to the required annual review of the PTASP and EPRP. This process must ensure that all elements of its PTASP and EPRP are reviewed within a three-year period. All associated plans or documents that support the PTASP or are included in the PTASP by reference, such as the Drug & Alcohol Program and Hours of Service Policy, must be reviewed within this three-year period as well.

By February 15th of each year the RTAs are required to submit an annual report to SSOA under the signature of the Accountable Executive that documents the internal reviews

conducted in the previous calendar year. With this report the RTA must include the five (5) ISRs the RTA intends to complete for that year.

SSOA participates in several ISRs conducted each year by both RTAs. This gives SSOA a better idea of how they are being conducted and completed. RTAs are required to send a notice 30 days in advance of the date of the proposed ISR, which contains a list of required items, along with the checklist that will be used to conduct the review. Both RTAs are compliant with the notice requirement for 2025. However, SSOA has concerns that some of the ISRs completed may be too narrow in scope to accomplish a complete review of the entire PTASP and EPRP. Indeed, TriMet has an existing CAP to address their ISR process, which is scheduled to be completed in July 2026.

The RTA must develop CAPs to address all findings of non-compliance from internal safety reviews. Proposed CAPs must be developed within 30 days of finalization of the internal safety review written report. The RTA must record and track any recommendations to completion on the RTA's respective Hazard Log.

Corrective Action Plans

Corrective Action Plans (CAPs) are designed to address hazards or deficiencies that cannot be immediately mitigated. These are usually identified because of a previously unknown hazard, a safety event investigation, observations or reviews, drills or exercises, hazard investigations, the safety risk management process, and internal and external safety audits and reviews performed by the RTA, the SSOA, or another agency, such as FTA or the National Transportation Safety Board (NTSB).

Triennial Audits

The SSOA is required to conduct an audit of the RTA covering implementation of its PTASP and EPRP at least once every three years. The SSOA is obligated to conduct audits to verify each RTA's compliance with its SSOA-approved PTASP and the SSOA Program Standard, the RTAs' own rules and procedures, including the Emergency Preparedness and Response Plan (EPRP), and other applicable rules and standards, as appropriate.

For each triennial audit, the SSOA develops a review schedule and creates checklists to ensure all PTASP elements are assessed within a three-year audit period. The review criteria is established using the Program Standard, FTA regulations and guidelines related to the PTASP, and industry best practices. The SSOA may conduct the Triennial Audit utilizing its own staff, qualified contractors, or a combination of the two, and may conduct it once every three years or continuously over a three year period. Oregon SSOA currently conducts them

once every three years. Findings from the audits become CAPs, which the RTAs and SSOA then track to completion.

The last triennial was done on both PSC and TriMet in late 2023. The next triennials will occur later this year. In the past we have done the audits for both RTAs during the same week. In 2026, these will be done on different weeks so as to give SSOA time to conduct a thorough review.

TriMet currently has three (3) remaining CAPs open from the 2023 triennial. PSC has one (1) open CAP that predates the triennial, for cameras on its vehicles.

Public Transportation Agency Safety Plan (PTASP)

Annually, each RTA is required to revisit its PTASP for updates. Once their draft report is complete, it is submitted to SSOA for review and approval. Due to several changes in the PTASP regulations over the years, SSOA coordinates with the RTA to assure compliance with the latest regulatory requirements. SSOA provides conditional approval of the final version of the PTASP, subject to the Board or Commission's approval. Once the Board or Commission has approved the plan, SSOA issues a final approval of the plan.

Since the requirement for the PTASP began in 2019, accordingly the RTAs have reviewed and updated their plans each year, followed by SSOA's review and approval. As FTA continues to tweak the program and its regulations, it's not likely that changes to the PTASP will cease being warranted for the foreseeable future.

Program Function

The SSOA program is federally mandated by FTA to oversee the safety of all RFGPTS within the SSOA's jurisdiction that receive federal funding (state regulations likewise require the safety oversight of the smaller systems that do not receive federal funding). To do that, the SSOA promulgates rules and requirements for compliance with both the federal and state requirements, which are represented in the Program Standard. The SSOA monitors the RTAs' compliance through meetings, inspections, audits and reviews, and subsequently tracks any corrective action plans (CAP) that arise from non-compliance with the rules, regulations, Program Standard and the RTA's own documents.

The SSOA Program Standard provides explanations and procedures for managing corrective actions, including monitoring and review, safety risk management and monitoring, auditing, internal safety reviews, and safety event investigations. It also includes information, procedures and requirements for the RBI and RWP. It explains Oregon SSOA's statutory

obligations and those of the RTAs, along with guidance and examples. It is a legal document that carries with it escalating penalties for non-compliance.

The Program Standard was most recently revised in 2025 to incorporate most of the applicable OARs into the document, thereby eliminating the need for them to remain in the Oregon Secretary of State's roster of OARs. Some OARs still remain separate and distinct and have not been incorporated directly into the Program Standard, yet they continue to require RTA compliance and SSOA oversight.

SSOA Program Staffing

The program currently has three full-time rail transit compliance specialists managed by ODOT Rail Safety & Regulatory Compliance Branch Manager Karla Tackett. The most recent rail transit compliance specialist joined the team in March 2025, with a background in maintenance of way (MOW) and rail equipment maintenance (REM). Oregon SSOA will be filling the position of a staffer who left in mid 2025. There is also a possibility of bringing on a manager to help with the SSO program and ODOT's rail crossing program.

FTA's special directive for RBI required a workload assessment that ultimately identified a need for additional support in the SSOA program. A procurement process was completed in late 2024 resulting in a consultancy that supports the SSOA's efforts to improve oversight and inspections at TriMet and Portland Streetcar, as well as to increase involvement in hazard mitigations, CAPs, PTASP implementation, and an increased presence and participation at TriMet and Portland streetcar, along with supporting the SSOA's work in complying with the changing federal regulations.

Federally funded Rail Transit Systems in Oregon

Tri-County Metropolitan Transportation District of Oregon (TriMet)

In 2025, the SSOA visited the field and conducted a total of 81 inspections, including three RBI inspections, that found a total of 68 defects. SSOA staff attended 45 meetings during 2025 covering a wide variety of topics, including PTASP update meetings, safety committee meetings, rail safety event status check-in meetings for corrective actions plans, and safety event review meetings. SSOA also attended in some of the ISRs performed.

Safety Events and Causal Factors

In 2025, TriMet MAX vehicles were involved in 53 safety events, of which 21 were reportable to both FTA and SSOA. The rest were reportable only to the SSOA. Those reportable only to

the SSOA include incidents and occurrences. As a result of the changes in terminology between 2024 and 2025, it is not practical to compare 2024 accident/safety event numbers with 2025. Instead, these statistics represent 2025 reportable safety events, all of which require investigation:

TriMet	2025 reportable safety events
Fatalities	3
Two or more injuries	0
Derailment	2
Collision resulting in one or more injuries	9
Collisions between two rail transit vehicles	2
Collision resulting in disabling damage to a rail transit vehicle	1
Evacuation for life safety reasons	4
Unintended train movement	0

Some safety event investigations were complicated by the lack of forward and operator facing cameras in the different types of rail transit vehicles (RTV), which may have helped substantiate or validate what the involved parties represented. To date, TriMet has equipped several of its RTVs with cameras, as noted: (green = yes, red = no) The numbers appearing below the RTV type is the number of those types of vehicles currently in the fleet:

Camera Type	Type 1 RTV (retired)	Type 2 (52)	Type 3 (27)	Type 4 (22)	Type 5 (18)	Type 6 (30)
Passenger	✓	✓	✓	✓	✓	✓
Forward Facing	✗	✓	✓	✓	✓	✓
Exterior Door	✗	✗	✗	✓	✓	✓
Operator facing Cab	✗	✗	✗	✗	✓	✓

Most often, the SSOA delegates the investigation of safety events to the RTA. The Program Standard includes investigatory requirements for all safety events, and the SSOA only accepts final reports produced by the RTA that comply with the guidelines therein; otherwise, the report is returned to the RTA for revision. There are instances when the SSOA will conduct their own investigation or share the responsibility of the investigation with the RTA. In any event, FTA requires that the final reports be approved and adopted by the SSOA.

The SSOA has reviewed, approved, and adopted all safety event investigation reports for 2025.

Portland Streetcar (PSC)

PSC is owned and operated by the City of Portland in partnership with TriMet, which contributes a portion of its operating funds. TriMet also provides operational and maintenance support. The City of Portland contracts with Portland Streetcar, Inc. (PSI), to construct and promote the Streetcar system. PSI is a private, non-profit corporation. Thus, the Streetcar is staffed by a combination of City of Portland employees, TriMet employees, and PSI personnel.

PSC is managed by the Portland Bureau of Transportation (PBOT), under the direction of the Commissioner-in-Charge of Transportation. The Commissioner-in-Charge of Transportation has appointed a Citizen Advisory Committee to advise the Commissioner, City Council, and PSC management on matters involving planning, design, and operation of the system.

The majority of inspections conducted in 2025 were comprised of routine monitoring of PSC operations. In total, SSOA inspectors made 24 field visits to Portland Streetcar in 2025, which identified 11 defects. Items inspected included station platforms, traffic lane and streetcar lane markings, and rail employee adherence to rail operating rules, train orders, and traffic laws. SSOA staff attended 18 meetings during 2025 covering a wide variety of topics, including PTASP update meetings, safety committee meetings, status check-in meetings for corrective actions plans, and reviews of changes to policy documents and plans.

Safety Events and Causal Factors

In 2025, streetcars were involved in 14 safety events, only four of which were reportable to both FTA and SSOA. The rest were reportable only to SSOA. As noted above, it is not practical to compare statistics for reportable safety events from 2024 due to the change in terminology. Therefore, this report includes only 2025 stats. Going forward, the comparison between years will begin again.

Portland Streetcar	2025 reportable
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	safety events
Fatalities	0
Two or more injuries	0
Derailment	0
Collision resulting in one or more injuries	2
Collisions between two rail transit vehicles	0
Collision resulting in disabling damage to a rail transit vehicle	0
Evacuation for life safety reasons	1
Unintended train movement	1

Oregon SSOA conducts safety assessments following most safety events at PSC. Given that the streetcar's operating environment is primarily in city traffic, recommendations from the SSOA are generally forwarded by PSC to PBOT. PBOT is responsible for the application of new pavement markings (such as lane delineators) and the maintenance of current applications.

Oregon SSOA reviewed, approved, and adopted the safety event reports submitted by PSC in 2025.

At the end of 2025, PSC had one open CAP for cameras in-cab and forward facing cameras. Those are expected to be installed by the end of March 2026.

Non-federally Funded Rail Transit Systems in Oregon

The Astoria Riverfront Trolley

The Astoria Riverfront Trolley (ART) is a heritage trolley located in Astoria, Oregon. The ART provides service along Astoria's Riverfront from the trolley barn located near Hamburg Street, to the East End Mooring Basin near 39th Street. The track, right-of-way, and trolley barn are owned by the City of Astoria. The Riverfront Trolley Association, Inc., is a nonprofit organization that owns and operates ART under the umbrella of the City of Astoria and the authority of the City Council. The city reserves the decision-making authority for right-of-way and track design and configuration through its City Manager. The City Manager has assigned responsibility for these items to the Public Works Director of the City of Astoria.

In 2025, the trolley ran on select days and hours in March through October. It does not run every day or even all day on the days it does run. It usually runs from 4-6 hours at a time, and the round trip takes about 60 minutes. SSOA visits ART before it opens every year to confirm that everything is in compliance with the applicable rules and regulations. Even though there was a change in the federal regulations as to the reporting of certain events,

those changes did not affect ART, since it is not subject to the federal rules. No matter the terms that apply, ART had no events to report in 2025. The last triennial done on ART was in 2024; their next one will be done in 2027. ODOT's FRA-certified mechanical inspector conducted an inspection of ART in March 2025. There was one defect found, and the trolley with the defect was placed out of service until the defect was corrected.

The ART is a volunteer organization with three paid positions: a trainer, a scheduler, and a bookkeeper. Volunteers cover several duties, including as motormen, conductors, maintenance workers, and in advertising and merchandising positions. The ART is self-supporting; it does not receive funding for operations from the city. Its revenues include fares, advertising, charter fees, donations, and sales of trolley memorabilia. It receives a small matching grant from the urban renewal district for capital items.

Willamette Shore Trolley

The Willamette Shore Trolley (WST) had been providing scenic trolley rides on a 6-mile section of a historic rail line between Lake Oswego and Portland, Oregon, since 1987 and is operated by volunteer members of the Oregon Electric Railway Historical Society (OERHS), a 501(c)(3) not-for-profit Oregon Corporation. The Willamette Shore Trolley is owned by the City of Lake Oswego.

As with ART, the last triennial on WST was conducted in 2024. There were no inspections or defects noted on WST in 2025. Because neither WST nor ART receive funding from FTA, they are not subject to the federal regulations, only to the state regulations. As a result, Oregon SSOA must bill both ART and WST for its oversight.

SSOA Planned Activities: 2025-2026

Much time was taken in 2025 developing an RWP program within the Program Standard, as well as working with the RTAs to create a compliant RWP programs that will pass muster with FTA. SSOA has approved and submitted the RWP programs from both RTAs to FTA. It is expected that 2026 will include time spent working with the RTAs to revise their programs, based on FTA's current practice. The program documentation was submitted by all SSOAs to FTA at the end of December 2025, but to date Oregon SSOA has not received a response from FTA to that submission; indeed, none of the 32 SSOs have received comments back from FTA, yet. The longer it takes for FTA to review and respond to submissions, the more likely comments and/or revisions will be forthcoming.

SSOA will be conducting triennial audits of both RTAs in the fall of 2026. These are time

intensive and require much cooperation between SSOA, SSOA's consultant support, and the RTAs. The triennials in the past were conducted for both RTAs within one (1) week, which allowed two and one-half (2.5) days to review each one. In 2026, the triennials will be split; each RTA's triennial will be performed over a week, to allow five (5) days each. It is likely the triennials won't be done back to back but several weeks apart.

In addition to the triennial audits to be performed, SSOA will be:

- Conducting an audit of the newly created RWP programs;
- Continuing RBI and regular inspections;
- Managing the CAPs from both agencies, including review and approval;
- Reviewing and approving each PTASP and EPRP;
- Reviewing and participating in various ISRs to be conducted by the RTAs;
- Reviewing safety event investigations for thoroughness and compliance in order for SSOA to adopt those reports, as required; and
- Incorporating any changes to the federal rules and regulations as required.

Appendix A

Acronyms

ART	Astoria Riverfront Trolley
BIL	Bipartisan Infrastructure Law
CAP	Corrective Action Plan
CCD	Commerce & Compliance Division
CFR	Code of Federal Regulations
EPRP	Emergency Preparedness and Response Plan
FTA	Federal Transit Administration
ISR	Internal Safety Review
MOW	Maintenance of Way
NTSB	National Transportation Safety Board
OAR	Oregon Administrative Rules
ODOT	Oregon Department of Transportation
OERHS	Oregon Electric Railway Historical Society
ORS	Oregon Revised Statutes
OTS	On-track Safety
PBOT	Portland Bureau of Transportation
PSC	Portland Streetcar
PSI	Portland Streetcar, Inc.
PTASP	Public Transportation Agency Safety Plan
RBI	Risk-based Inspections
REM	Rail Equipment Maintenance
RFGPTS	Rail Fixed Guideway Public Transportation System
RBI	Risk Based Inspection
RTA	Rail Transit Agency
RWP	Roadway Worker Protection Program
RTA	Rail Transit Agency
RTV	Rail Transit Vehicle
SMS	Safety Management System
SSO	State Safety Oversight
SSOA	State Safety Oversight Agency
TRIMET	Tri-County Metropolitan Transportation District of Oregon
USC	United States Code
WES	Westside Commuter Express