#	Date	Source	Name	Comment
1.	11/21/2025	Letter	Craig McDonald, Director, Safety Management Systems & Environmental Services on behalf of TriMet	See attached letter.

November 21, 2025

Gian Olsen
Oregon Department of Transportation
455 Airport Road SE Bldg A
Salem, OR 97301

To Whom it May Concern,

Over the calendar year, the Tri-County Metropolitan Transportation District of Oregon (TriMet) has worked with Oregon Department of Transportation's (ODOT) State Safety Oversight Agency (SSOA) to provide comment and inform their 2025 revision of the Program Standard. This includes updating the Oregon Administrative Rules (OAR) to directly reference the Program Standard, rather than including duplicative language from the Standard. TriMet does not have a comment on the updated OARs; however, we do have some continued comments on the revised Program Standard that will be embedded into the OARs. Below is a summary of the concerns we have regarding our ability to maintain compliance with the revised standard due to financial, organizational, or regulatory clarity limitations.

Interchanging references to RTA and RFGPTS (Throughout Program Standard)

Throughout the ODOT SSOA Program Standard, ver. 7.0, the acronyms for Rail Transit Agency (RTA) and Rail Fixed Guideway Public Transportation System (RFGPTS) are used interchangeably. However, these terms are distinct. As defined within the Program Standard itself, Section 3, an RTA is "any entity that provides services on a RFGPTS." Simply put, the RTA provides service, and the RFGPTS is the infrastructure on which the service is provided.

It is confusing, then, to find statements such as: "Oregon SSOA inspectors may notify the RFGPTS in advance of upcoming inspection activities…" or "The RFGPTS shall supply necessary forms…" (Section 8). Rail infrastructure cannot receive notifications or supply forms.

As the Program Standard is frequently cited in internal programs and procedures, this inconsistency may lead to significant and unnecessary confusion. TriMet requests that the entire document be reviewed and revised to use the terms RTA and RFGPTS consistently and correctly.

15 days for monthly reports with increased data requirements (Section 12.2)

When the Program Standard, ver. 6.0, which was published on April 2, 2025, rules regarding monthly regulatory reporting from RTAs were significantly changed. The list of required documents rose from five logs maintained by the Safety Department to twelve documents maintained by several working groups throughout the agency. Additionally, the reporting window was shortened from 30 days to 15 days following the end of the month being reported.

There is a significantly increased regulatory burden to submit more than double the amount of data, and to collect it in half the time. TriMet is amenable to the new list of required documents, but requests that the report deadline be returned to 30 days following the end of the month being reported.

Number of Required Internal Safety Reviews Annually (Section 5.1.2)

Previous versions of the Program Standard required RTAs to perform five Internal Safety Reviews (ISRs) annually; one of which was required to review the agency's Competency Management System (CMS), and another to review the agency's Configuration and Change Management Program (CCMP). For the remaining three, the agency could use its discretion in selecting a subject (typically a specific department or program). Before the publication of the Program Standard, ver. 7.0, TriMet requested the removal of requirements for annual ISRs of the RTA's (CMS) and (CCMP), as these programs are an existing component of each department's ISRs.

While ODOT SSOA agreed to remove the requirement for standalone, annual reviews of the CMS and CCMP, it retained the requirement of five total Internal Safety Reviews. Under the current triennial model, replacing the required CMS and CCMP ISRs with department-focused ISRs without reducing the amount would require TriMet to review more departments under ODOT's purview than it currently operates. Beyond the impact this would have on operations, it would also constitute an additional administrative burden on each department for little to no value gained for our Safety Management System (SMS). While the removal of the CMS and CCMP reviews will save TriMet resources financially, that burden will only be replaced by these additional reviews. At a time when TriMet is managing a budget deficit, the reduced financial burden of fewer reviews would be a welcome revision. Depending on size and scope, each internal safety review has an estimated cost of between $40,000 and $70,000, including contracted auditors' fees and TriMet staff hours. TriMet is amenable to increasing our department-focused ISRS, but requests that the Program Standard be revised to

require four ISRs annually rather than five. ODOT SSOA would still maintain the authority to mandate additional ISRs as deemed necessary.

Reference to Transit System and Asset Support (Section 8.11.1)

Section 8.11.1 of the Program Standard states: "TriMet's Transit System and Asset Support Division may act as an additional resource for safety and performance data." While the language used in this statement implies some flexibility, TriMet finds it would be bad practice to directly associate a required task with a specific department. Task assignments are the sole responsibility of TriMet's General Manager, Executive Leadership Team, and their designees. Additionally, TriMet regularly undergoes organizational changes, and the aforementioned division is not guaranteed to exist under its current name and function for an extended period. As a regulatory document, TriMet requests that the Program Standard be revised to simply state the requirement and remain silent on the manner in which the RTA satisfies it.

TriMet believes that with minimal changes above, the District will be better able to meet the intent of the Program Standard and maintain regulatory compliance. This will allow TriMet to focus more on maintaining its mission of connecting people with valued mobility options that are safe, convenient, reliable, accessible, and welcoming for all.

Sincerely,

Craig McDonald

Director, Safety Management Systems & Environmental Services