



CITY OF LODI

**PUBLIC TRANSPORTATION AGENCY
SAFETY PLAN (PTASP)**

City of Lodi – Transit Division
Prepared by: PTASP Chief Safety Manager and
PTASP Accountable Executive



Public Works - Transit Division

Adopted:
June 2020

Revised:
December 2025

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1. TRANSIT AGENCY INFORMATION

Transit Agency	Name		Address	
	City of Lodi		221 West Pine Street, Lodi, CA 95240	
Accountable Executive	Name		Title	
	Sean Nathan		Public Works Interim Director	
Chief Safety Officer	Name		Title	
	Julia Tyack		Transportation Manager	
Mode(s) of Service Covered by This Plan:			List All FTA Funding Types (e.g., 5307, 5337, 5339):	
Fixed Route Bus: Motorbus (MB)			5307, 5339	
Non-Fixed Route Bus: Demand Response (DR)			5307, 5339	
Mode(s) of Service Provided by the CITY OF LODI (Directly operated or contracted service)				
Fixed Route: Motorbus (MB) – contracted service				
Non-Fixed Route: Demand Response (DR) – contracted service				
Does the agency provide transit services on behalf of another transit agency or entity?	Yes	No	Description of Arrangement(s)	
		X	N/A	
Transit Agency(ies) or Entity(ies) for Which Service Is Provided	Name		Address	
	N/A			
	N/A			

ACCOUNTABLE EXECUTIVE

City of Lodi’s Accountable Executive is the Public Works Director. The Public Works Director is the single, identifiable person who has ultimate responsibility for carrying out this Agency Safety Plan and the City of Lodi’s Transit Asset Management (TAM) Plan, and control or direction over the human and capital resources needed to develop and maintain both this Plan and the TAM Plan.

The Public Works Director is accountable for ensuring that the Agency’s Safety Management Systems (SMS) is effectively implemented throughout the Agency’s public transportation system. The Public Works Director is accountable for ensuring action is taken as necessary, to address substandard performance in the Agency’s SMS. The Public Works Director may delegate specific responsibilities, but the ultimate accountability for the Transit Agency’s safety performance cannot be delegated and always rests with the Public Works Director.

CHIEF SAFETY OFFICER

The Public Works Director designates the Transportation Manager as City of Lodi’s Chief Safety Officer who has the authority and responsibility for day-to-day implementation and operation of the Agency’s SMS. The Chief Safety Officer holds a direct line of reporting to the Accountable Executive, as shown in **Appendix A: Staff Safety Roles Organizational Chart**, and has a strong working relationship with the operations and asset management functions at City of Lodi.

2. PLAN DEVELOPMENT, APPROVAL, AND UPDATES

The City of Lodi developed the contents of this Public Transportation Agency Safety Plan (PTASP) to meet the requirements specified in 49 CFR Part 673. This Plan is based on the four (4) principles or pillars of the Safety Management System (SMS). SMS is defined as the formal, top-down, organization-wide, data-driven approach to managing safety risk and assuring the effectiveness of safety mitigations. It includes systematic policies, procedures, and practices for the management of safety risk. The four principles or pillars of SMS are: (1) Safety Management Policy; (2) Safety Risk Management; (3) Safety Assurance; and (4) Safety Promotion.

The Federal Transit Administration (FTA) will oversee compliance with the requirements of Part 673 through the existing Triennial Review Process.

SIGNATURE BY THE ACCOUNTABLE EXECUTIVE

The City of Lodi developed this plan. By signature below, the Accountable Executive confirms the development of this plan.

Sean Nathan, Accountable Executive

Date Signed

APPROVAL BY LODI CITY COUNCIL

The Lodi City Council approved the original Plan on **June 17, 2020**, as documented in **Resolution #2020-130** (see Appendix C: Documentation of City Council PTASP Approval).

Updates to the Plan were approved on **December 20, 2023 (Resolution #2023-285)** and on **November 6, 2024 (Resolution #2024-183)**, as documented in Appendix C.

CERTIFICATION OF COMPLIANCE

Pursuant to 49 CFR Parts 673.13(a) and 673.13(b), City of Lodi certifies that it has established this Agency Safety Plan, meeting the requirements of 49 CFR Part 673 by July 20, 2020.

FTA does not require this plan to be submitted to FTA. Instead, City of Lodi will certify that it has established this Safety Plan, which fulfills the requirements under Part 673. FTA annually amends and issues the list of Certifications and Assurances. City of Lodi will review such guidance for incorporation into the safety program as necessary.

PLAN REVIEW & UPDATES

City of Lodi updates this Safety Plan when information, processes or activities change within the Agency and/or when Part 673 undergoes significant changes, or annually, whichever comes sooner. As City of Lodi collects data through its Safety Risk Management and Safety Assurance

processes, shared with the California Department of Transportation, Caltrans, and the local Metropolitan Planning Organization, San Joaquin Council of Governments (SJCOG). SJCOG and Caltrans will evaluate City of Lodi's Safety Performance Targets (SPTs) to determine whether they need to be changed, as well.

This Plan will be jointly reviewed and updated annually following the July fiscal year end by the Chief Safety Officer and Safety Manager, with support from subject matter experts. The Accountable Executive will approve any changes, and may forward on to the Lodi City Manager or City Council to approve as determined appropriate or necessary.

This Plan may need to be reviewed and updated more frequently based on the following:

- We determine our approach to mitigating safety deficiencies is ineffective;
- We make significant changes to service delivery;
- We introduce new processes or procedures that may impact safety;
- We change or re-prioritize resources available to support SMS;
- We significantly change our organizational structure.

A Record of Revisions, documenting the history of changes made to the City of Lodi's PTASP, is provided in **Appendix D: Record of Revisions**. This document is included in the appendix to maintain consistent page numbering.

3. DEFINITIONS AND ACRONYMS

The following definitions may be used throughout this document, and correspond to the definitions provided in 49 CFR 673.5.

Accident - An event (as defined below) that involves any of the following:

1. A loss of life,
2. A report of a serious injury to a person,
3. A collision of public transportation vehicles,
4. A runaway train,
5. An evacuation for life safety reasons, or
6. Any derailment of a rail transit vehicle (any location, any time, any cause).

Accountable Executive - A single, identifiable individual who has ultimate responsibility for carrying out the Public Transportation Agency Safety Plan (as defined below) of a public transportation agency; responsibility for carrying out the agency's Transit Asset Management Plan (as defined below), and control or direction over the human and capital resources needed to develop and maintain both the agency's Public Transportation Agency Safety Plan, in accordance with 49 U.S.C. 5329(d), and the agency's Transit Asset Management Plan in accordance with 49 U.S.C. 5326.

Assault on Transit Worker - Any intentional act of physical aggression, threat, or harassment directed toward a transit employee while performing transit-related duties.

CDC - The Centers for Disease Control and Prevention, a national public health agency within the Department of Health and Human Services. The CDC is responsible for releasing public health recommendations to prevent the spread of infectious disease.

Chief Safety Officer - 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 Chief Safety Officer may not serve in other operational or maintenance capacities, unless the Chief Safety Officer 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.

Collision Types – Categories of vehicle incidents, including: Vehicular Collision: involving one or more transit vehicles and other vehicles. Pedestrian Collision: Involving a transit vehicle and a pedestrian. Transit Vehicle Collision: involving two or more transit vehicles.

De-escalation Training - Training provided to employees on strategies and techniques to safely manage conflict, prevent assaults, and reduce risk to employees and passengers.

Equivalent Authority -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 Public Transportation Agency Safety Plan.

Event - A general term encompassing accidents, incidents, and occurrences (each as defined herein)

FTA - The Federal Transit Administration, an operating administration within the United States Department of Transportation.

Hazard - 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 (as defined below).

Hazard Log – A documented record maintained by the Chief Safety Officer to track identified hazards, risk mitigations, and follow-up actions.

Incident - An event that involves one of the following:

1. A personal injury that is not a serious injury,
2. One or more injuries requiring medical transport, or
3. Damage to facilities, equipment, rolling stock, or infrastructure that disrupts the operations of a transit agency.

Investigation- The process of determining the causal and contributing factors of an “accident”, “incident”, or “hazard” (each as defined here), for the purpose of preventing recurrence and mitigating risk.

Major Event – Any safety-related occurrence that meets the FTA criteria for reporting as a significant transit event, including accidents, fires, or other serious incidents affecting passengers, employees, or transit assets.

National Public Transportation Safety Plan - The plan to improve the safety of all public transportation systems that receive federal financial assistance under 49 U.S.C. Chapter 53.

Occurrence - 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 - A provider of public transportation as defined under 49 U.S.C. 5302(14).

Performance Measure - 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 / Safety Performance Target (SPT) - A quantifiable level of performance or condition, expressed as a value for the measure, to be achieved within a time period required by the Federal Transit Administration (FTA).

Public Transportation Agency Safety Plan (PTASP) - The documented comprehensive agency safety plan for a transit agency that is required by 49 U.S.C. 5329 and Part 673.

Risk -The composite of predicted severity and likelihood of the potential effect of a hazard.

Risk Mitigation - A method or methods to eliminate or reduce the effects of hazards.

Safety Assurance - Processes within a transit agency's Safety Management System that functions to ensure the implementation and effectiveness of safety risk mitigation, and to ensure that the transit agency meets or exceeds its safety objectives through the collection, analysis, and assessment of information.

Safety Management Policy - A transit agency's documented commitment to safety, which defines the transit agency's safety objectives and the accountabilities and responsibilities of its employees in regard to safety.

Safety Management System (SMS) - The formal, top-down, 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 Performance Target (SPT) - A Performance Target related to safety management activities.

Safety Promotion - A combination of training and communication of safety information to support SMS as applied to the transit agency's public transportation system.

Safety Risk Assessment (SRA) - The formal activity whereby a transit agency determines Safety Risk Management priorities by establishing the significance or value of its safety risks.

Safety Risk Management (SRM) - A process within a transit agency's Public Transportation Agency Safety Plan for identifying hazards and analyzing, assessing, and mitigating safety risk.

Serious Injury -Any injury which:

Public Transportation Agency Safety Plan

1. Requires hospitalization for more than 48 hours, commencing within 7 days from the date of the injury was received;
2. Results in a fracture of any bone (except simple fractures of fingers, toes, or noses);
3. Causes severe hemorrhages, nerve, muscle, or tendon damage;
4. Involves any internal organ; or
5. Involves second- or third-degree burns, or any burns affecting more than 5 percent of the body surface.

Small Public Transportation Provider – 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 - A State of the United States, the District of Columbia, Puerto Rico, the Northern Mariana Islands, Guam, American Samoa, and the Virgin Islands.

State of Good Repair (SGR) - The condition in which a capital asset is able to operate at a full level of performance.

Transit Agency - An operator of a public transportation system.

Transit Asset Management Plan - 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.

COMMONLY USED ACRONYMS:

ADA	Americans with Disabilities Act of 1990
ASP	Agency Safety Plan (also referred to as a PTASP in Part 673)
CDC	Center for Disease Control and Prevention
CFR	Code of Federal Regulations
ESRP	Employee Safety Reporting Program
CSO	Chief Safety Officer
FTA	Federal Transit Administration
MAP-21	Moving Ahead for Progress in the 21st Century
MPO	Metropolitan Planning Organization
NTD	National Transit Database
Part 673	49 CFR Part 673 (Public Transportation Agency Safety Plan)
PTASP	Public Transportation Agency Safety Plan
SGR	State of Good Repair
SMS	Safety Management System
SOP	Standard Operating Procedure
SRM	Safety Risk Management
TAM	Transit Asset Management
U.S.C.	United States Code
VRM	Vehicle Revenue Miles

4. SAFETY PERFORMANCE MEASURES AND ANNUAL TARGETS

As part of this Safety Plan, the City of Lodi has established **Safety Performance Targets (SPTs)**, which will be **reviewed and updated annually**. These targets are based on the safety performance measures outlined in the **National Public Transportation Safety Plan**. The City of Lodi tracks the following **measures** for reporting and target-setting purposes: **major events, fatalities, injuries, assaults on transit workers, collisions (vehicular and pedestrian) and system reliability**.

The City of Lodi’s safety performance targets are based on data from the past **three fiscal years (July 2022 – June 2025)**.

Refer to **Appendix B: Safety Performance Measures – Totals and Rates per 100,000 VRM**. This table summarizes the City of Lodi’s **total occurrences and calculated rates per 100,000 Vehicle Revenue Miles (VRM)** for each safety performance measure during this period.

Safety Performance Measures are defined according to the *2025 National Transit Database (NTD) Safety and Security Policy Manual (released November 2025)*.

Safety performance measures used for this plan were sourced from the April 2024 release of the *National Public Transportation Safety Plan, Version 2*.

REPORTABLE FATALITIES

Death confirmed within 30 days of a safety event (including suicides). Fatalities that occur because of illnesses, drug overdoses, or other natural causes (including individuals who are found deceased) are not reportable.

The City of Lodi has had **zero** reportable fatalities in the past three years.

The target for the next year, 2026, is **zero** fatalities.

REPORTABLE INJURIES

***Injury:** means any harm to persons as a result of an event that requires immediate medical attention away from the scene. Each person transported away from the scene for medical attention is a reportable injury, even if the person does not appear to be injured. The injury is reportable even if they are not transported via ambulance; the reportable event is based on the immediate requirement for medical attention.*

Does not include harm resulting from a drug overdose, exposure to the elements, illness, natural causes, or occupational safety events occurring in administrative buildings. Illnesses that require transport away from the scene for medical attention is not reportable if the illness is unrelated to a safety event.

If an individual seeks medical care several hours after an event or in the days following an event, that does not constitute immediate medical transportation away from the scene. This criterion requires that the individual receive medical attention at a location other than the location at which the event occurred. This distinction serves to exclude minor first aid or other minor medical assistance received at the scene.

Persons who are transported away from the scene for the following reasons are not reportable:

- *Illness, natural causes, exposure to the elements, intoxication, drug overdose, or mental health evaluation unrelated to a specific reportable event*
- *Declarations or allegations of self-harm with no evident injury.*

Transit Worker Injuries: *Transit worker injuries include any injuries to employees, contractors, or volunteers performing work on behalf of the transit agency. This encompasses transit vehicle operators, maintenance and fleet personnel, facility staff, and other transit staff or contractors.*

*A reportable transit worker injury is one resulting from a safety or security event occurring on transit right-of-way or infrastructure, at a revenue facility, at a maintenance facility, during a transit-related maintenance activity, or involving a transit revenue vehicle, **and** meeting one or more NTD reporting thresholds. One of these thresholds includes **a single-injury event in which the worker is transported away from the scene for medical attention.***

Common “Other Safety Incident” categories — when the event is not a collision, derailment, or major security event — include slip, trip, and fall incidents (including contact with a non-moving vehicle); maintenance-worker injuries; boarding or alighting events; abrupt or evasive vehicle maneuvers; mobility-device securement issues; and incidents involving stairs, elevators, or escalators.

The City of Lodi had **three** injuries meeting this definition in the past three years.

Date	Description of Event
9/15/2022	A transit operator fell on the bus ramp while assisting a passenger off the bus. This qualifies as a transit worker injury because it occurred during transit-related activities involving a transit revenue vehicle , and the employee sought immediate medical attention away from the scene following the incident.
10/10/2023	Passenger requested ambulance due to pain; passenger stated the pain was from a recent surgery. Event did not meet the Reportable Injury criteria because injury was due to a passenger condition (surgery) & unrelated to a transit safety event.
1/20/2024	A transit operator tripped after exiting the bus in the transit station parking lot, a transit revenue facility. This event qualifies as a transit worker injury because it occurred during transit-related activities at a transit revenue facility and the employee sought immediate medical attention away from the scene following the incident.

4/22/2024	Passenger was lethargic on bus, fell, and requested ambulance; passenger stated they had low blood pressure. Event did not meet the Reportable Injury criteria because injury was due to a passenger condition (illness) & unrelated to a transit safety event.
9/7/2024	Passenger was found unconscious on the bus during transport and was transported to the hospital by ambulance. This does not meet the criteria for a reportable injury , as the loss of consciousness appears to be due to natural causes or intoxication unrelated to a reportable event.
1/30/2025	A transit employee fell while getting off the bus. This qualifies as a transit worker injury because it occurred during transit-related activities while exiting a transit revenue vehicle , and the employee sought immediate medical attention away from the scene following the incident.
3/18/2025	A passenger using a mobility scooter tipped over during transport, causing injuries to two passengers. One passenger was transported by ambulance to the hospital for medical evaluation, while the other was treated on-site and did not require transport. This incident qualifies as a reportable event because it resulted in passenger injuries that required immediate medical attention away from the scene .

The target for the next year, 2026, is **zero** injuries.

REPORTABLE MAJOR EVENTS

*A **Major Event** is any safety or security incident that meets **one or more** of these thresholds and must be documented in the agency’s Safety Performance Measures.*

***Fatalities:** Any incident resulting in a **death within 30 days** of the event. More information under reportable fatalities section.*

***Injuries:** An injury is any injury that occurs during transit-related activities and requires **immediate medical attention away from the scene**. **Not all injuries are considered major events**. An injury is classified as a **major event** only if it results in **hospitalization, serious harm, or significant operational impact** as defined by PTASP.*

***Evacuations for Life-Safety Reasons:** Any evacuation of passengers or employees due to an immediate safety hazard, including: fire or smoke, hazardous materials or fuel leaks, electrical hazards, weapons discharged, bomb threats or suspicious items, security threats, or off-property hazards affecting transit vehicles or facilities (e.g., nearby gas leak, fire). Self-evacuations are not automatically reportable unless another threshold (injury, fatality, property damage) is met.*

***Property Damage of \$25,000 or More:** Any event resulting in \$25,000 or more in combined damage to transit or non-transit property, vehicles, equipment, or costs to clear the scene.*

Collisions: A collision is considered a Major Event when it meets any of the following: Results in a fatality, injury transport, evacuation, or \$25,000+ property damage. Requires tow-away of a transit or non-transit vehicle. Involves a suicide or attempted suicide with contact to a transit vehicle causing injury or fatality. Involves an assault or homicide with contact to a transit vehicle causing injury or fatality. Involves transit equipment (revenue or non-revenue) and meets any of the above thresholds

Fires: Any fire requiring fire department response that also meets one or more Major Event thresholds (injury, evacuation, or \$25,000+ damage).

The City of Lodi has had **two** reportable major events.

Date	Description of Event
10/4/2022	Details for the 10/4/2022 collision, which met the property damage threshold, can be found in the Collision Rate section below.
3/18/2025	Details for the 3/18/2025 incident, which met the injury threshold, are provided in the Reportable Injuries section.

The target for the next year, 2026, is **zero** major events.

COLLISION RATES (NEW)

Collision Rate & Vehicular Collision Rate: A reportable non-rail collision is any collision that results in one or more of the following:

- An injury requiring immediate medical transport from the scene
- A fatality
- An evacuation for life-safety reasons
- Property damage of \$25,000 or more
- Towing of the transit or non-transit vehicle

The vehicular collision rate is calculated as the number of reportable collisions per 100,000 Vehicle Revenue Miles (VRM).

Pedestrian Collision Rate: Includes all reportable collisions involving a person, as defined by the National Transit Database (NTD), including:

- Pedestrians
- Bicyclists on non-motorized bicycles
- Skateboarders

This rate is also expressed per 100,000 VRM.

The City of Lodi had **one** collision meeting this criterion in the past three years.

Date	Description of Event
10/4/2022	Operator struck bus wash equipment at the Municipal Services Center, causing \$29,346.22 in damages. The accident was determined to be preventable. This collision qualifies as a reportable event because the property damage exceeded \$25,000.

The target for next year, 2026, is **zero** collisions.

ASSAULTS (NEW)

Physical Assaults - An assault in which the attack involves physical contact with the transit worker. This could include any physical contact with the victim from the attacker's body, a weapon, a projectile, or other item.

Non-Physical Assaults - An assault in which the attack involves no physical contact with the transit worker. This could include threats or intimidation that did not result in any physical contact with the transit worker.

The City of Lodi had **two** assaults meeting this criterion in the past three years.

Date	Description of Event
11/7/2023	Operator informed the passenger of the policy regarding carts and personal belongings and advised that he could not board with the number of items he was carrying. The passenger then verbally threatened the operator and struck the bus window with a shovel, causing it to shatter. This incident is classified as a non-physical assault .
12/12/2024	The operator advised the passengers of the food and drink policy and instructed them to deboard. The passengers then made verbal threats toward the driver, constituting a non-physical assault .

The target for next year, 2026, is **zero** assaults.

SYSTEM RELIABILITY

Major mechanical failure preventing a vehicle from completing or starting scheduled trip, defined by average distance between major mechanical failures.

Mode	July 2021 – June 2024			July 2022 – June 2025		
	VRM	Major Mechanical Failures	Avg Distance Between Failures	VRM	Major Mechanical Failures	Average Distance Between Failures
Fixed Route	726,029	61	11,902	776,297	39	19,905
Dial-A-Ride	156,676	8	19,585	162,568	2	81,284

The City of Lodi has an average of **19,905** vehicle revenue miles between major mechanical failures in fixed route.

The City of Lodi has an average of **81,284** vehicle revenue miles between major mechanical failures in Dial-A-Ride.

To calculate SPTs, the City of Lodi referred to system safety data, including:

- Accident investigation reports (with causal factor analysis)
- Internal safety audits (or reviews)
- Injury reports
- Safety event reports (including accidents, incidents, and occurrences)
- System monitoring (including monthly reports, and testing and inspection records)

LOCATION OF OCCURRENCE

Major events should meet the following location requirements:

- Occurs at a transit revenue facility, maintenance facility;
- Occurs on transit right-of-way or infrastructure (the underlying framework or structures that support a public transportation system);
- Occurs during a transit-related maintenance activity; or
- Involves a transit revenue vehicle.

Safety event location requirements do not include:

- Events that occur off transit property where affected persons, vehicles, or objects come to rest on transit property after the event;
- Occupational safety events occurring in administrative buildings;
- Deaths that are confirmed to be a result of illness, drug overdose or other natural causes, outside of a reportable event
- Other events (assault, robbery, non-transit vehicle collisions, etc.) occurring at bus stops or shelters that are not on transit-owned property-unless the event involves either a transit vehicle or a person boarding/alighting from a vehicle
 - Bus stops or shelters owned by municipalities or authorities that also operate transit systems are not considered “transit-owned” property for the purpose of this analysis (see the most current annual NTD Reporting Policy Manual for more detail distinguishing bus stops from facilities);
- Collisions that occur while transit personnel are travelling to or from a transit-related maintenance activity; and
- Collisions involving a supervisor car or other non-revenue transit service vehicle operating on public roads.

MINIMIZING EXPOSURE TO INFECTIOUS DISEASE

The City of Lodi recognizes that infectious diseases can pose a safety risk to employees and passengers and implements measures to minimize exposure in accordance with guidance from the **CDC, Cal/OSHA, and local public health authorities**. Current mitigation measures include sanitation stations at building entrances and employee areas, driver barriers installed on buses, remote meeting options to reduce unnecessary in-person interactions, and PPE availability for staff with masks available to passengers upon request. The agency continuously monitors public health guidance and evaluates new strategies as needed, integrating these activities into the City of Lodi’s

Safety Management System (SMS) to ensure ongoing risk assessment, mitigation, and continuous improvement.

DE-ESCALATION TRAINING (NEW)

The City of Lodi recognizes that interactions with passengers and the public can occasionally escalate into unsafe situations. To reduce risks and protect both employees and passengers, all front-line transit staff, including operators, maintenance staff, and other relevant personnel, receive **de-escalation training**.

Training includes strategies for **communication, conflict resolution, and handling difficult situations** in a safe and professional manner. Methods include instructor-led sessions, scenario-based exercises, and online modules. Employees complete initial training upon hire and participate in **refresher training annually** to maintain skills.

The agency monitors and tracks de-escalation training through its **Safety Management System (SMS)** to ensure compliance, assess effectiveness, and identify opportunities for continuous improvement.

SAFETY PERFORMANCE TARGET COORDINATION

FTA requires City of Lodi to coordinate with the State of California Department of Transportation (Caltrans) and the regional MPO, San Joaquin Council of Governments (SJCOG), in the selection of state and MPO safety performance targets, to the maximum extent practicable. Pursuant to 49 CFR Part 673.15(a), City of Lodi will make safety performance targets available to Caltrans and SJCOG to aid in the planning process upon certification of this plan. Additionally, City of Lodi will transmit performance data against the safety performance targets to Caltrans and SJCOG on an annual basis.

5. SAFETY MANAGEMENT SYSTEM (SMS)

SMS is a comprehensive, collaborative approach that brings management and labor together to build on the transit industry's existing safety foundation to control risk better, detect and correct safety problems earlier, share and analyze safety data more effectively, and measure safety performance more carefully. City of Lodi's SMS focuses on applying resources to risk and is based on ensuring that the City of Lodi has the organizational infrastructure to support decision-making at all levels regarding the assignment of resources. Some key parts of City of Lodi's SMS include:

- Defined roles and responsibilities;
- Strong executive safety leadership;
- Formal safety accountabilities and communication;
- Effective policies and procedures; and
- Active employee involvement

Furthermore, City of Lodi's SMS has four distinct components, which are discussed in subsequent sections to this Safety Plan:

- (1) Safety Management Policy
- (2) Safety Risk Management
- (3) Safety Assurance
- (4) Safety Promotion

5 – (1) SAFETY MANAGEMENT POLICY (SMP)

The first component of the City of Lodi's SMS is the Safety Management Policy, which is the foundation of the City of Lodi's safety management system. It clearly states the organization's safety objectives and sets forth the policies, procedures, and organizational structures necessary to accomplish the safety objectives. The Safety Management Policy clearly defines management and employee responsibilities for safety throughout the organization. It also ensures that management is actively engaged in the oversight of the system's safety performance by requiring regular review of the Safety Management Policy, budget and program by the designated Accountable Executive.

City of Lodi Safety Management Policy (SMP)

Safety is a core value at City of Lodi and managing safety is a core business function. City of Lodi will develop, implement, maintain, and continuously improve processes to ensure the safety of our customers, employees, and the public. City of Lodi's overall safety objective is to proactively manage safety hazards and their associated safety risk, with the intent to eliminate unacceptable safety risk in our transit operations.

City of Lodi will:

- Clearly, and continuously explain to all staff that everyone working within City of Lodi must take part and be responsible and accountable for the development and operation of the Safety Management System (SMS).
- Work continuously to minimize safety risks. Work to comply with and, wherever possible, exceed legislative and regulatory requirements and standards for passengers and employees. This includes following best-practice safety recommendations given by State or Federal agencies (e.g. California Department of Public Health and Centers for Disease Control and Prevention) to minimize the exposure or spread of infectious disease
- Work to ensure that all employees are provided appropriate safety information and training, are competent in safety matters, and assigned tasks commensurate with duties and skills.
- Reaffirm that responsibility for making our operations safer for everyone lies with all employees – from executive management to frontline employees. Each manager is responsible for implementing the SMS in their area of responsibility and will be held accountable to ensure that all reasonable steps are taken to perform activities established through the SMS.

City of Lodi established safety performance targets to help measure the overall effectiveness of our processes and ensure we meet our safety objectives. City of Lodi will keep employees informed about safety performance goals and objectives to ensure continuous safety improvement.

Safety Management Policy Communication

The Safety Management Policy is communicated throughout the Agency, to all employees, managers, and executives, as well as contractors, and to the Lodi City Council.

This is accomplished through various processes such as:

- Workshops/training sessions - Conducted for Senior Management, Directors, Managers, Supervisors. Once this Plan or any update to this Plan has been signed by the CEO/General Manager approved by the Board of Directors and certified by Caltrans it will become standard practice in perpetuity so that SMS becomes standard business practice. All Union representatives will be kept informed.
- New Hire Safety Orientation – All new employees regardless of their classifications will be trained about their roles and responsibilities pertaining to PTASP and the principles of SMS.
- Safety bulletins, email safety newsletter blasts to staff, toolbox/tailgate safety meetings and/or safety committee meetings

Employee Safety Reporting Program

City of Lodi implemented a process that allows employees [and contracted employees] to report safety conditions to senior management, protections for employees who report safety conditions to senior management. The purpose, description and protections for employees to report unsafe conditions and hazards are described in the Employee Safety Reporting Program as below:

Purpose:

- a) To establish a system for City of Lodi employees to identify unsafe conditions or hazards at work and report them to their department management without fear of reprisal. However, disciplinary action could result if the condition reported reveals the employee willfully participated in or conducted an illegal act, gross negligence or deliberate or willful disregard of regulations or procedures, including reporting to work under the influence of controlled substances, physical assault of a coworker or passenger, theft of agency property, unreported safety events, unreported collisions, and unreported passenger injuries or fatalities.
- b) To provide guidelines for facilitating the timely correction of unsafe conditions or hazards by City of Lodi management.

Description:

- a) This program provides a method for City of Lodi management to identify, evaluate, and correct or avoid unsafe conditions or hazards, procedural deficiencies, design

inadequacies, equipment failures, or near misses that adversely affect the safety of employees.

Examples of voluntary safety reports may include, but are not limited to:

- Safety hazards in the operating environment (for example, county or city road conditions),
- Health hazards in the operating environment, especially with regards to the spread of infectious diseases (for example, lack of adequate personal protection equipment),
- Policies and procedures that are not working as intended (for example, insufficient time to complete pre-trip inspection),
- Events that senior managers might not otherwise know about (for example, near misses), and
- Information about why a safety event occurred (for example, radio communication challenges).
 - a) The program also involves recommending corrective actions and resolutions of identified unsafe conditions or hazards and/or near miss.
 - b) All employees have the obligation to report immediately any unsafe conditions or hazards and near miss to their immediate supervisor /department manager and may do so without fear of reprisal.
 - c) Unsafe conditions or hazards may also be identified as a result of occupational injury or illness investigations and/or by accident investigation.
 - d) Other means by which hazards may be identified are inspections/audits or observations made by the supervisors/management staff as referenced in agency's Safety Inspection Program.
 - e) Findings will be published immediately following mitigation actions. If employee identification is available, direct feedback regarding mitigation will be provided.

Non-Punitive Reporting Policy

City of Lodi committed to the safest transit operating standards practicable. To achieve this, it is imperative that City of Lodi have uninhibited reporting of all safety events that may compromise safe operations. To this end, every employee is responsible for the communication of any information that may affect the integrity of transit safety. Such communication must be completely free of any form of reprisal.

City of Lodi will not take disciplinary action against any employee who discloses a safety event. This policy shall not apply to information received by City of Lodi from a source other than the employee, or that involves an illegal act, or a deliberate or willful disregard of rules, regulations, or agency policies or procedures.

City of Lodi's method of collection, recording, and disseminating information obtained from transit safety reports has been developed to protect, to the extent permissible by law, the identity of any employee who provides transit safety information.

SMP/S Authorities, Accountabilities, and Responsibilities

This Plan has assigned specific SMS authorities, accountabilities, and responsibilities to the designated Accountable Executive; Chief Safety Officer; Agency's Leadership/Executive Management; and Key Staff/Employees as described below:

Accountable Executive

City of Lodi's Accountable Executive is the Public Works Director. The Public Works Director is accountable for ensuring that the Agency's SMS is effectively implemented throughout the Agency's public transportation system. The Public Works Director is accountable for ensuring action is taken, as necessary, to address substandard performance in the Agency's SMS. The Public Works Director may delegate specific responsibilities, but the ultimate accountability for the City of Lodi's safety performance cannot be delegated and always rests with the Public Works Director. The Public Works Director is accountable for ensuring that the Agency's SMS is effectively implemented, and that action is taken, as necessary, to address substandard performance in the Agency's SMS. The Accountable Executive may delegate specific responsibilities, but not accountability for City of Lodi's safety performance.

The Public Works Director roles include, but are not limited to:

- Decision-making about resources (e.g. people and funds) to support asset management, SMS activities, and capital investments;
- Signing SMS implementation planning documents;
- Endorsing SMS implementation team membership; and
- Ensuring safety concerns are considered and addressed in the agency's ongoing budget planning process.
- Ensuring transparency in safety priorities: for the Board of Directors and for the employees.
- Establishing guidance on the level of safety risk acceptable to the agency.
- Assuring safety policy is appropriately communicated throughout the agency.
- Other duties as assigned/necessary.

Chief Safety Officer

The Chief Safety Officer has the authority and responsibility for day-to-day implementation and operation of the City of Lodi's SMS.

Chief Safety Officer's Roles include:

- Decision-making about resources (e.g., people and funds) to support asset management, SMS activities, and capital investments;

- Overseeing the safety risk management program by facilitating hazard identification, safety risk assessment, and the development and implementation of safety risk mitigations.
- Monitoring safety risk mitigation activities;
- Providing periodic reports on safety performance;
- Briefing the Accountable Executive and Lodi City Council on SMS implementation progress;
- Planning safety management training; and
- Developing and organizing annual audits/reviews of SMS processes and the Agency Safety Plan to ensure compliance with 49 CFR Part 673 requirements.
- Maintaining safety documentation.
- Other duties as assigned/necessary.

Key Staff and Frontline Employee Responsibilities

Key Staff for the City of Lodi's Safety Management System (SMS) includes the PTASP Safety Manager, Contract General Manager, Contract Safety & Training Manager, Fleet Superintendent, Facilities Supervisor, and frontline employees, such as transit vehicle operators, maintenance staff, and other personnel directly involved in transit operations.

Their responsibilities include:

- Implementing the SMS daily within their departments and throughout the organization.
- Communicating safety accountability from frontline employees up to the Accountable Executive.
- Ensuring employees follow working rules, safety procedures, and regulations relevant to their roles.
- Overseeing the safety reporting program, ensuring unsafe conditions and hazards are reported and addressed promptly.
- Providing and maintaining training, certification, and refresher programs, including de-escalation and job-specific safety training.
- Monitoring and promoting passenger, employee, and public safety in all operations.
- Responding to customer complaints and service expectations regarding safety, frequency, and reliability.
- Maintaining and replacing aging facilities, equipment, and infrastructure as needed to ensure safety.
- Collecting, analyzing, and maintaining safety performance data to identify trends, assess risk, and support safety performance targets.
- Participating in hazard identification, risk assessment, and mitigation processes to reduce safety risks.

- Establishing and maintaining clear lines of safety communication and accountability throughout the organization.
- Supporting the continuous improvement of the SMS through feedback, audits, and adherence to federal requirements (49 CFR Part 673).

5 – (2) SAFETY RISK MANAGEMENT (SRM)

The second component of the City of Lodi’s SMS is Safety Risk Management, which includes processes and procedures to provide an understanding of the Agency’s operations and vehicle maintenance to allow individuals to identify hazards associated with those activities.

City of Lodi has implemented a Safety Risk Management process for all elements of its transportation system. The Safety Risk Management process includes the following activities:

- Safety hazard identification
- Safety risk assessment, and
- Safety risk mitigation.

Safety Hazard Identification

Hazard identification is the first step in the Safety Risk Management process and a key component. It involves these fundamental safety-related activities: Identifying safety hazards and their consequences; assessing the risks associated with the consequences of the hazards; and developing mitigations to reduce the potential consequences of the identified hazards.

The following is City of Lodi’s methods and processes to identify hazards. The Agency considers, as a source for hazard identification, data and information provided by an oversight authority and the FTA. Hazards are identified through a variety of sources, including:

- Employee safety reporting,
- Review of vehicle camera footage,
- Review of monthly performance data and safety performance targets,
- Observations from supervisors,
- Maintenance reports,
- Comments from customers, passengers, and third parties,
- Safety committee, driver and all-staff meetings,
- Results of audits and inspections of vehicles and facilities,
- Results of training assessments
- Investigations into safety events, incidents and occurrences, and
- Information from FTA and oversight authorities.
- Public health information from public health agencies, such as the CDC.

When a hazard has been identified, whatever the source, it is reported to the City of Lodi Chief Safety Officer, who enters it into the Hazard Log. The Chief Safety Officer also may enter hazards into this log based on reviews of operations and maintenance activities and procedures.

The Chief Safety Officer will investigate hazards to collect information and determine if hazards need to be entered into the safety risk assessment process. In following up on identified hazards, the Chief Safety Officer may:

- Reach out to the reporting party, if available, to gather all known information about the reported hazard,
- Conduct a walkthrough of the affected area, assessing the possible hazardous condition, generating visual documentation (photographs and/or video), and taking any measurements deemed necessary,
- Conduct interviews with employees in the area to gather potentially relevant information on the reported hazard,
- Review any documentation associated with the hazard (records, reports, procedures, inspections, technical documents, etc.),
- Contact other departments that may have association with or technical knowledge relevant to the reported hazard,
- Review any past reported hazards of a similar nature, and
- Evaluate tasks and/or processes associated with the reported hazard.

City of Lodi's Chief Safety Officer will then prepare an agenda to discuss identified hazards and consequences with the Safety Committee during monthly meetings. This agenda may include additional background on the hazards and consequences, such as the results of trend analyses, vehicle camera footage, vendor documentation, reports and observations, or information supplied by FTA or other oversight authorities.

Any identified hazard that poses an immediate risk to transit operations, the health and safety of employees or the public, or equipment must immediately be brought to the attention of the Accountable Executive and placed through the Safety Risk Management process for safety risk assessment and mitigation. Otherwise, hazards will be prioritized for further Safety Risk Management activity.

Safety Risk Assessment

Safety risk assessment defines the level or degree of the safety risk by assessing the likelihood and severity of the consequences of hazards and prioritizes hazards based on the safety risk. The Chief Safety Officer, with assistance from key staff subject matter experts, is responsible for assessing identified hazards and ratings using the safety risk matrix below. Prioritizing safety risk provides the Accountable Executive with the information needed to make decisions about resource application.

The following matrix, adopted from the TSI Participation Guide – SMS Principles for Transit, facilitates the ranking of hazards based on their probability of occurrence and severity of their outcome.

Probability Levels			
Description	Level	Specific Individual Item	Fleet Inventory
Frequent	A	Likely to occur often in the life of an item.	Continuously experienced.
Probable	B	Will occur several times in the life of an item.	Will occur frequently.
Occasional	C	Likely to occur sometime in the life of an item.	Will occur several times.
Remote	D	Unlikely, but possible to occur in the life of an item.	Unlikely, but can reasonably be expected to occur.
Improbable	E	So unlikely, it can be assumed occurrence may not be experienced in the life of an item.	Unlikely to occur, but possible.
Eliminated	F	Incapable of occurrence. This level is used when potential hazards are identified and later eliminated.	Incapable of occurrence. This level is used when potential hazards are identified and later eliminated.

The measuring goes from A to F with A being frequent or likely to occur frequently and E being improbable or expected that this event will most likely never occur. The designation F is used when potential hazards are identified and later eliminated.

Severity Levels		
Description	Level	Mishap Result Criteria
Catastrophic	1	Could Result in one or more of the following: death, permanent total disability, irreversible significant environmental impact, or monetary loss equal to or exceeding \$10M
Critical	2	Could result in one or more of the following: permanent partial disability, injuries or occupational illness that may result in hospitalization of at least three personnel, reversible significant environmental impact, or monetary loss equal to or exceeding \$1M but less than \$10M
Marginal	3	Could result in one or more of the following: injuries or occupational illness resulting in one or more lost work day(s), reversible moderate environmental impact, or monetary loss equal to or exceeding \$100k but less than \$1M
Negligible	4	Could result in one or more of the following: injuries or occupational illness not resulting in lost work day, minimum environmental impact. Or monetary loss less than \$100k.

The Safety Risk Severity Table presents a typical safety risk. It includes four categories to denote the level of severity of the occurrence of a consequence, the meaning of each category, and the assignment of a value to each category using numbers. In this table, 1 is considered catastrophic meaning possible deaths and equipment destroyed and 4 is considered negligible or of little consequence with two levels in between.

Safety Risk Probability and Safety Risk Severity are combined into the Safety Risk Index Ranking to help prioritize safety risks according to the table below.

Safety Risk Assessment Matrix

Severity → Probability ↓	Catastrophic 1	Critical 2	Marginal 3	Negligible 4
A-Frequent	1A	2A	3A	4A
B- Probable	1B	2B	3B	4B
C-Occasional	1C	2C	3C	4C
D- Remote	1D	2D	3D	4D
E- Improbable	1E	2E	3E	4E
F- Eliminated				
Safety Risk Index Ranking				
1A, 1B, 1C, 2A, 2B	High	Unacceptable		
1D, 2C, 3A, 3B	Serious	Undesirable - With management decision required		
1E, 2D, 2E, 3C, 3D, 3E, 4A, 4B,	Medium	Acceptable - with review by management		
4C, 4D, 4E	Low	Acceptable - without review		

The Chief Safety Officer documents recommendations regarding hazard rating and mitigation options and reports this information to the Accountable Executive.

Safety Risk Mitigation

The Chief Safety Officer, assisted by Key Staff subject matter experts, reviews current safety risk mitigations and establish procedures to 1) eliminate; 2) mitigate; 3) accept specific risks. Prioritization of safety remediation measures is based on risk analysis and a course of action acceptable to City of Lodi management.

Safety risks ranked as **Unacceptable (High – Red)** must be mitigated. All mitigated risks, including those ranked as **Acceptable (Low – Green)**, undergo regular monitoring to ensure mitigation strategies remain effective.

Key strategies to minimize the types of risks that potentially exist include:

- Development and deployment of policies and procedures that address known hazards and risks,
- Discussion of other actions, strategies and procedures that might help safeguard against unknown/unforeseen risks,
- Training of drivers and other agency staff on all safety policies and procedures,
- Training of drivers and other agency staff on de-escalation techniques, conflict resolution, and methodologies for handling emergencies, with a focus on preventing assaults and reducing risk to employees and passengers; and
- Training of drivers and staff on proper and effective use of emergency equipment and communication technologies and protocol.
- Monitoring and follow-up of all reported assault incidents, including documentation in the hazard log and review of mitigation effectiveness.

Safety risk mitigations, including those addressing assaults, are tracked and updated in the Hazard Log by the Chief Safety Officer.

5 – (3) SAFETY ASSURANCE

The third component of the Agency’s SMS is Safety Assurance, which ensures the performance and effectiveness of safety risk controls established under safety risk management. Safety assurance also helps ensure that the organization meets or exceeds its safety objectives through the collection, analysis, and assessment of data regarding the organization's performance. Safety assurance includes inspection activities to support oversight and performance monitoring.

The City of Lodi monitors its operations and maintenance protocols and procedures, and any safety risk mitigations to ensure that it is implementing them as planned. Furthermore, the Agency investigates safety events and any reports of non-compliance with applicable regulations, standards, and legal authority. Finally, the Agency continually monitors information reported to it through any internal safety reporting programs, including the employee safety reporting program.

Some of the key elements of City of Lodi’s Safety Performance Monitoring and Measurement are shown below:

Safety Performance Monitoring and Measurement

As part of the Safety Assurance Process, City of Lodi:

- **Monitors the system for compliance with, and sufficiency of, the Agency’s procedures for operations and maintenance through:**
 - Safety audits,
 - Informal inspections,
 - Regular review of on-board camera footage to assess drivers and specific incidents,
 - Safety surveys,
 - Employee Safety Reporting Program (ESRP),
 - Investigation of safety occurrences,
 - Safety review prior to the launch or modification of any facet of service,
 - Daily data gathering and monitoring of data relating to the delivery of service,
 - Regular vehicle inspections and preventative maintenance, and
 - Continuous feedback loop between leadership and all levels of the agency.

- **Monitors its operations to identify any safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended through:**
 - Reviewing results from accident, incident, and occurrence investigations,
 - Monitoring employee safety reporting,
 - Reviewing results of internal safety audits and inspections, and

- Analyzing operational and safety data to identify emerging safety concerns.
- **Conducts investigations of safety events to identify causal factors:**
City of Lodi maintains documented procedures for conducting safety investigations of events (accidents, incidents, and occurrences, as defined by FTA) to find causal and contributing factors and review the existing mitigations in place at the time of the event. These procedures also reflect all traffic safety reporting and investigation requirements established by California Department of Motor Vehicles.

The Chief Safety Officer maintains all documentation of City of Lodi's investigation policies, processes, forms, checklists, activities, and results. After an incident, an investigation report is prepared and reviewed by the Chief Safety Officer, Safety Manager, and contract staff General Manager and Safety and Training manager to determine:

- If the accident was preventable or non-preventable
 - Personnel require discipline or retraining
 - The causal factor(s) indicate(s) that a safety hazard contributed to or was present during the event; and
 - If the accident appears to involve underlying organizational causal factors beyond just individual employee behavior.
- **Monitors information reported through any internal safety reporting programs:**
 - The Chief Safety Officer routinely reviews safety data captured in employee safety reports, safety meeting minutes, customer complaints, and other safety communication channels. When necessary, the Chief Safety Officer ensures that the issues and concerns are investigated or analyzed through the safety risk assessment process.
 - The Chief Safety Officer also reviews the results of internal and external reviews, including audits and assessments, with findings affecting safety performance, compliance with operations and maintenance procedures, or the effectiveness of safety risk mitigations. The Chief Safety Officer discusses relevant safety issues and concerns with the Accountable Executive and executive management and documents the results of these reviews in the Hazard Log.

In the event of a fatality, the City of Lodi complies with all FTA drug and alcohol requirements. In California, every driver involved in an accident that results in death, injury, or property damage over \$1000, effective January 1, 2017, must report the accident on a Report of Traffic Accident Occurring in California (SR 1) form to DMV. The report forms are available at www.dmv.ca.gov, by calling 1-800-777-0133, and at CHP and DMV

offices. Also, under California Vehicle Code §16002(b) the driver of a vehicle that is owned or operated by a publicly owned or operated transit system, or that is operated under contract with a publicly owned or operated transit system, and that is used to provide regularly scheduled transportation to the general public or for other official business of the system shall, within 10 days of the occurrence of the accident, report to the transit system any accident of a type otherwise required to be reported pursuant to subdivision (a) of Section 16000. The City of Lodi requires driver notification to the City of Lodi immediately and maintains records of any report filed pursuant to this paragraph.

5 – (4) SAFETY PROMOTION

The fourth component of the Agency’s SMS is Safety Promotion, which includes a combination of training and communication of safety information to employees to enhance the Agency’s safety performance. Safety Promotion sets the tone for the SMS and helps City of Lodi to establish and maintain a robust safety culture. Safety Promotion has two-components: (1) Safety Communication; and (2) Competencies and Training.

City of Lodi believes safety promotion is critical to the success of an SMS by ensuring that the entire organization fully understands and trusts its safety policies, procedures, and structure. Further, safety promotion involves establishing an organizational and workplace culture that recognizes safety as a core value, training employees in safety principles, and allowing open communications of safety issues.

Safety Communication & Safety Culture

Positive safety culture must be generated from the top. The actions, attitudes, and decisions at the policy-making level must demonstrate a genuine commitment to safety. Safety must be recognized as the responsibility of each employee, with the ultimate responsibility for safety resting with Executive Management. Employees must trust that they will have management support for decisions made in the interest of safety, while also recognizing that intentional breaches of safety will not be tolerated.

The primary goal of safety promotion at City of Lodi is to develop a positive safety culture that allows the SMS to succeed. A positive safety culture is defined as one which is:

A. An Informed Culture

- Employees understand the hazards and risks involved in their areas of operation
- Employees are provided with the necessary knowledge, training and resources
- Employees work continuously to identify and overcome threats to safety

B. A Just Culture

- Employees know and agree on what is acceptable and unacceptable behavior
- Human errors must be understood, but negligence and willful violations cannot be tolerated

C. A Reporting Culture

- Employees are encouraged to voice safety concerns and to share critical safety information without the threat of punitive action
- When safety concerns are reported, they are analyzed, and appropriate action is taken

D. A Learning Culture

- Learning is valued as a lifetime process beyond basic-skills training
- Employees are encouraged to develop and apply their own skills and knowledge to enhance safety
- Employees are updated on safety issues by management, and safety reports are fed back to staff so that everyone learns the pertinent lessons

City of Lodi communicates safety and safety performance information throughout the 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 an employee safety reporting program.

Ongoing safety communication is critical and City of Lodi ensures communication occurs up, down, and across all levels of the organization. Any lessons learned are communicated to all concerned. Management commitment to address safety concerns and hazards is communicated on a regular basis. Management encourages and motivates employees to communicate openly, authentically, and without concern for reprisal; ensures employees are aware of SMS principles and understand their safety-related roles and responsibilities; conveys safety critical information such as accident data, injuries, and reported safety concerns and hazards and their resolutions to employees. City of Lodi's tools to support safety communication include:

- Safety bulletins
- Safety notices
- Posters
- CDs or Thumb drives or online safety video access
- Newsletters
- Briefings or Toolbox talks
- Seminars and workshops
- New employee training and refresher training
- Intranet or social media
- Safety Committee Meetings

Safety promotion activities and processes include the following:

- Monthly Transit Operations Contractor Safety meetings and postings for drivers
- California Transit Indemnity Pool (CalTIP) field service days

Competencies & Training

Executive Management ensures that all employees attend the training provided to understand their specific roles and responsibilities for the implementation of SMS. City of Lodi provides SMS training in the following areas:

All Employees:

- Understanding of Safety Performance Targets
- Understanding of fundamental principles of SMS
- Understanding of Safety Reporting Program – Reporting unsafe conditions and hazards/near misses
- Understanding of their individual roles and responsibilities under SMS

Managers and Supervisors

- Understanding of Safety Risk Management
- Understanding of Safety Assurance
- Understanding of Safety Promotion
- Understanding of their individual roles and responsibilities for SMS

Executive Management:

- Understanding of management commitment to and support of all SMS activities.

All employees are required to acquire the competencies and knowledge for the consistent application of their skills as they relate to safety performance objectives. City of Lodi dedicates resources to conduct effective safety-related skill training. The scope of the safety training is appropriate to each employee's individual safety-related job responsibilities and their role in SMS. Components of City of Lodi's skill-related training include:

- Conducting training needs analyses to ensure that the right information is being taught to the right employees using the most efficient training methods.
- Communicating purpose, objectives, and outcome.
- Ensuring relevant content by directly linking training to the trainee's job experiences so trainees are more motivated to learn.
- Using active hands-on demonstrations and practice to demonstrate skills that are being taught and provide opportunities for trainees to practice skills.
- Providing regular feedback during hands-on practice and exercises.

- Reinforcing training concepts in the post-training work environment by giving employees opportunities to perform what they've learned.

City of Lodi's comprehensive safety training program applies to all City of Lodi employees and contract staff directly responsible for safety, including:

- Bus vehicle operators,
- Dispatchers,
- Maintenance technicians,
- Managers and supervisors,
- Agency Leadership and Executive Management,
- Chief Safety Officer, and
- Accountable Executive

City of Lodi dedicates resources to conduct a comprehensive safety training program, as well as training on SMS roles and responsibilities. The scope of the safety training, including annual refresher training, is appropriate to each employee's individual safety-related job responsibilities and their role in the SMS.

Basic training requirements for City of Lodi employees, including frequencies and refresher training, are documented in City of Lodi's Safety Training Matrix and the City of Lodi Employee Handbook. Operations safety-related skill training includes the following:

- New-hire bus vehicle operator classroom and hands-on skill training,
- Bus vehicle operator refresher training,
- Bus vehicle operator retraining (recertification or return to work),
- Classroom and on-the-job training for dispatchers,
- Classroom and on-the-job training for operations supervisors and managers, and
- Accident investigation training for operations supervisors and managers. Vehicle maintenance safety-related skill training includes the following:
 - Ongoing vehicle maintenance technician skill training,
 - Ongoing skill training for vehicle maintenance supervisors,
 - Accident investigation training for vehicle maintenance supervisors,
 - Ongoing hazardous material training for vehicle maintenance technicians and supervisors, and,
 - Training provided by vendors.
- City of Lodi's Accountable Executive and Agency Leadership and Executive Management team must complete FTA's SMS Awareness online training.
- City of Lodi conducts refresher training **quarterly** during employee safety meetings.

6. DOCUMENTATION

Pursuant to 49 CFR Part 673.31, City of Lodi maintains records related to this Safety Plan and Safety Management System (SMS) implementation for a minimum of three years. These documents include but are not limited to:

- The implementation of the SMS
- The programs, policies and procedures used to carry out this Agency Safety Plan
- The results from SMS processes and activities

City of Lodi will make these documents available to FTA Region 9, Caltrans, and other Federal and state agencies upon request.

7. APPENDICES

Appendix A: Staff Safety Roles Organizational Chart

Appendix B: Safety Performance Measures – Totals and Rates per 100,000 VRM

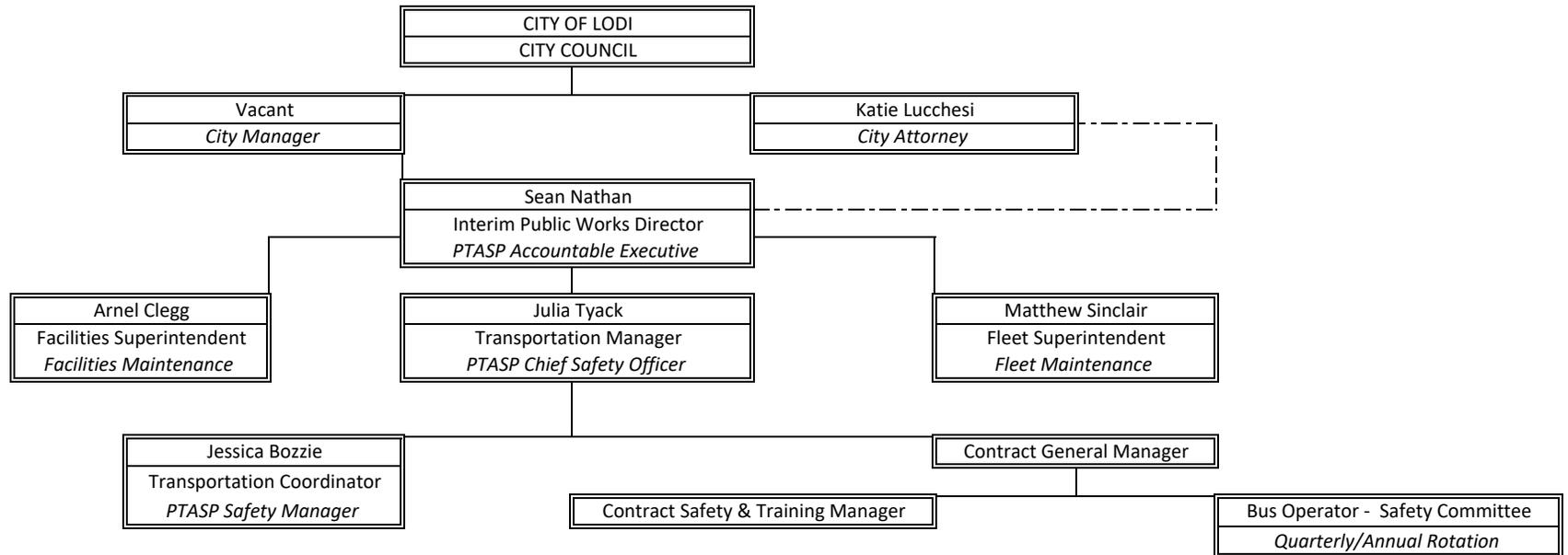
Appendix C: Documentation of City Council PTASP Approval

Appendix D: Record of Revisions

APPENDIX A

Appendix A – Safety Roles in Organizational Chart

**CITY OF LODI
PTASP PROGRAM**



Appendix B: Safety Performance Measures – Totals and Rates per 100,000 VRM

		July 2022 - June 2025																	
Mode of Transit Service	Vehicle Revenue Miles VRM	MAJOR EVENTS							FATALITIES			INJURIES				ASSAULTS		SYSTEM RELIABILITY	
		1a: Major Events	1b: Major Event Rate	1.1: Collision Rate (NEW)		1.1.1: Pedestrian Collision Rate (NEW)		1.1.1: Vehicular Collision Rate (NEW)	2a: Fatalities	2b: Fatality Rate	2.1: Transit Worker Fatality Rate (NEW)	3a: Injuries	3b: Injury Rate	3.1: Transit Worker Injury Rate (NEW)		4a: Assaults on Transit Workers (NEW)	4b: Rate of Assaults on Transit Workers (NEW)	5: System Reliability	
		Total # of Reportable Events	Rate per 100K VRM	Total # of Reportable Collisions	Rate per 100K VRM	Total# of Reportable Pedestrian Collisions	Rate per 100K VRM	Rate per 100k VRM (Same as 1.1: Collision Rate)	Total # of Reportable Fatalities	Rate per 100K VRM	Rate per 100k VRM	Total # of Reportable Injuries	Rate per 100K VRM	Total # of worker Injuries	Rate per 100K VRM	Total # of Reportable Assaults on Transit Workers	Rate per 100K VRM	Total # of Major mechanic failures	Avg. distance between major mechanical failures
Fixed Route Bus Mode (MB)	776,297	1.00	0.13	1.00	0.13	0.00	0.00	0.13	0.00	0.00	0.00	0.00	0.00	2.00	0.26	2.00	0.26	39.00	19,905.05
Demand Response/ADA Paratransit Mode (DR)	162,568	1.00	0.62	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.00	0.62	1.00	0.62	0.00	0.00	2.00	81,284.00	

Table Updated December 2025

Appendix C –
Documentation of City Council PTASP 2020 Approval

RESOLUTION NO. 2020-130

A RESOLUTION OF THE LODI CITY COUNCIL APPROVING
CITY OF LODI PUBLIC TRANSPORTATION AGENCY SAFETY
PLAN AND AUTHORIZING PUBLIC WORKS DIRECTOR TO
EXECUTE PUBLIC TRANSPORTATION AGENCY SAFETY PLAN

=====

WHEREAS, the City of Lodi's Public Transportation Agency Safety Plan (PTASP) is a requirement for Federal Transit Administration (FTA) funding and was developed in accordance with FTA's final rule for PTASPs, 49 CFR Part 637, as authorized by the Moving Ahead for Progress in the 21st Century Act (MAP-21); and

WHEREAS, the final rule requires transit operators develop and implement a PTASP based on the Safety Management System (SMS) approach; and

WHEREAS, SMS is the formal, top-down, organization-wide approach to managing safety risk and assuring the effectiveness of a transit agency's safety risk mitigation, including systematic procedures, practices, and policies and is meant to ensure a formalized, proactive, and data-driven approach to safety risk management; and

WHEREAS, the City's Public Works Director will be identified as Lodi's PTASP Accountable Executive, responsible for carrying out the Agency Safety Plan and ensuring effective implementation of the program throughout the City's transit system and the City's Transportation Manager will be identified as Lodi's PTASP Chief Safety Officer, responsible for day-to-day implementation and operation of the City of Lodi's SMS; and

WHEREAS, staff recommends approving City of Lodi Public Transportation Agency Safety Plan and authorizing Public Works Director to execute Public Transportation Agency Safety Plan.

NOW, THEREFORE, BE IT RESOLVED that the Lodi City Council does hereby approve City of Lodi Public Transportation Agency Safety Plan and authorizes the Public Works Director to execute Public Transportation Agency Safety Plan; and

BE IT FURTHER RESOLVED, pursuant to Section 6.3q of the City Council Protocol Manual (Res. No. 2019-223), the City Attorney is hereby authorized to make minor revisions to the above-referenced document(s) that do not alter the compensation or term, and to make clerical corrections as necessary.

Dated: June 17, 2020

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I hereby certify that Resolution No. 2020-130 was passed and adopted by the City Council of the City of Lodi in a regular meeting held June 17, 2020, by the following vote:

AYES: COUNCIL MEMBERS – Chandler, Mounce, Nakanishi, and Mayor Kuehne
NOES: COUNCIL MEMBERS – None
ABSENT: COUNCIL MEMBERS – None
ABSTAIN: COUNCIL MEMBERS – None


PAMELA M. FARRIS
Assistant City Clerk

Appendix C –
Documentation of City Council PTASP 2023 Approval

RESOLUTION NO. 2023-285

A RESOLUTION OF THE LODI CITY COUNCIL APPROVING
2023 CITY OF LODI PUBLIC TRANSPORTATION AGENCY
SAFETY PLAN UPDATE

=====

WHEREAS, the City of Lodi’s Public Transportation Agency Safety Plan (PTASP) is a requirement for Federal Transit Administration (FTA) funding and was developed in accordance with FTA’s final rule for PTASPs, 49 CFR Part 637, as authorized by the Moving Ahead for Progress in the 21st Century Act (MAP-21); and

WHEREAS, the Lodi City Council approved the City of Lodi Public Transportation Agency Safety Plan and authorized the Public Works Director to execute Public Transportation Agency Safety Plan (Resolution No. 2020-130); and

WHEREAS, to remain compliant with FTA’s PTASP program requirements, the City of Lodi is updating its plan to reflect new Safety Performance Targets and updates to SMS procedures; and

WHEREAS, staff recommends that the City Council approve the updated City of Lodi Public Transportation Agency Safety Plan.

NOW, THEREFORE, BE IT RESOLVED that the Lodi City Council does hereby approve the updated City of Lodi Public Transportation Agency Safety Plan and authorizes the Public Works Director to execute the Public Transportation Agency Safety Plan; and

BE IT FURTHER RESOLVED, pursuant to Section 6.3q of the City Council Protocol Manual (Res. No. 2019-223), the City Attorney is hereby authorized to make minor revisions to the above-referenced document(s) that do not alter the compensation or term, and to make clerical corrections as necessary.

DATED: December 20, 2023

=====

I hereby certify that Resolution No. 2023-285 was passed and adopted by the City Council of the City of Lodi in a regular meeting held December 20, 2023, by the following vote:

AYES: COUNCIL MEMBERS – Bregman, Hothi, Nakanishi, Yopez, and Mayor Craig

NOES: COUNCIL MEMBERS – None

ABSENT: COUNCIL MEMBERS – None

ABSTAIN: COUNCIL MEMBERS – None


OLIVIA NASHED
City Clerk

Appendix C -
Documentation of City Council PTASP 2024 Approval

RESOLUTION NO. 2024-183

A RESOLUTION OF THE LODI CITY COUNCIL APPROVING 2024 CITY OF
LODI PUBLIC TRANSPORTATION AGENCY SAFETY PLAN UPDATE

=====

WHEREAS, the City of Lodi's Public Transportation Agency Safety Plan (PTASP) is a requirement for Federal Transit Administration (FTA) funding and was developed in accordance with FTA's final rule for PTASPs, 49 CFR Part 637, as authorized by the Moving Ahead for Progress in the 21st Century Act (MAP-21); and

WHEREAS, the Lodi City Council approved the City of Lodi Public Transportation Agency Safety Plan and authorized the Public Works Director to execute Public Transportation Agency Safety Plan (Res. No. 2020-130); and

WHEREAS, to remain compliant with FTA's PTASP program requirements, the City of Lodi is updating its plan to reflect new Safety Performance Targets; and

WHEREAS, staff recommends that the City Council approve the updated City of Lodi Public Transportation Agency Safety Plan.

NOW, THEREFORE, BE IT RESOLVED that the Lodi City Council does hereby approve updated City of Lodi Public Transportation Agency Safety Plan and authorizes the Public Works Director to execute Public Transportation Agency Safety Plan.

Dated: November 6, 2024

=====

I hereby certify that Resolution No. 2024-183 was passed and adopted by the City Council of the City of Lodi in a regular meeting held November 6, 2024, by the following vote:

AYES: COUNCIL MEMBERS – Bregman, Hothi, Nakanishi, and Mayor Craig

NOES: COUNCIL MEMBERS – None

ABSENT: COUNCIL MEMBERS – Yopez

ABSTAIN: COUNCIL MEMBERS – None



OLIVIA NASHED
City Clerk

APPENDIX D

RECORD OF REVISIONS

Revision Number and Updates			
<i>Complete history of successive versions of this plan</i>			
Revision No.	Section/Pages Affected	Details	Date Issued
1.	Pg. 5, 10 & 11; App. A	Revised plan review and update language; Revised 'major mechanical failure' SPTs; Revised organizational chart with new employees	9/20/2021
2.	Pg. 3, 10 & 11; App. A	Updated Chief Safety Officer due to staffing change; Revised Safety Performance Targets (SPTs); Revised organizational chart with new employees	8/8/2022
3.	Pg. 4-6, 8, 9-11, 13-14, 18, App. A, App. B, App. C	<ol style="list-style-type: none"> 1. Under section "3. DEFINITIONS AND ACRONYMS," added: "CDC – Center for Disease Control and Prevention" 2. Under section "4. Safety Performance Targets (SPTs)," added: <ul style="list-style-type: none"> • Key safety performance goal pertaining to the minimization of exposure to infectious disease. • Outlined several ongoing strategies that were implemented/developed via the PTASP Safety Management System, that contributes to minimizing exposure to infectious disease. • Updated Safety Performance Targets (SPTs) 3. Section "5 – (1) Safety Management Policy:" <ul style="list-style-type: none"> • Added compliance to best-practice safety recommendations of State or Federal Agencies, especially when considering exposure or spread of infectious disease. • When describing voluntary safety reports, added health hazards with regards to infectious disease. 4. Section "5 – (2) Safety Risk Management": <ul style="list-style-type: none"> • City added public health agencies (e.g. CDC) as a source of safety hazard information. 5. Organizational Chart: <ul style="list-style-type: none"> • Updated new City Manager, City Attorney, and Fleet Superintendent. Updated job titles. 	10/30/2023 & 12/20/2023 (Council Approval)
4.	Pg. 9-12	<ol style="list-style-type: none"> 1. Under Section 4. "Safety Performance Targets (SPTs):" <ul style="list-style-type: none"> • Updated reference to the 2024 NTD Safety & Security Policy Manual (previously 2023 edition). • Clarified exclusion criteria for reportable fatalities in Section 4, "Safety Performance Targets (SPTs)." • Clarified exclusion criteria for reportable injuries and added a table for near-threshold injuries during the analysis period. • Clarified and expanded criteria for reportable safety events, including exclusions. Added a table of safety event occurrences during analysis period. 	10/2/2024 & 11/6/2024 (COUNCIL APPROVAL)

APPENDIX D

		<ul style="list-style-type: none"> • Updated Safety Performance Targets (SPTs) with FY23-24 data. • Added subsection on Location of Occurrence, clarifying criteria for reportable events based on location. <p>2. Organizational Chart:</p> <ul style="list-style-type: none"> • Updated new City Manager and job titles. 	
5.	Pg. 3, 8-14, 19, Appen. A, Appen. B, Appen. C	<p>Appendices & Terminology</p> <ul style="list-style-type: none"> • Appendix A – Staff Safety Roles Organizational Chart: Updated to reflect current key personnel and job titles, including the City Manager, PTASP Accountable Executive, and PTASP Safety Manager, with corresponding updates throughout the document. • Appendix B – Safety Performance Measures: Added to encompass all data; table removed from body of document. • Appendix C – Added documentation of Plan approval from the November 2024 City Council resolution. • Terminology: Changed “safety event” to “major event” throughout the document. <p>Section 3 – Definitions & Acronyms</p> <ul style="list-style-type: none"> • Added definitions to address new measures and PTASP requirements. <p>Section 4 – Safety Performance Measures and Annual Targets</p> <ul style="list-style-type: none"> • New Measures: Added reporting, definitions, and targets for the following: <ul style="list-style-type: none"> ○ Collision Rate ○ Pedestrian Collision Rate ○ Vehicular Collision Rate ○ Transit Worker Fatality Rate ○ Transit Worker Injury Rate ○ Assaults on Transit Workers ○ Rate of Assaults on Transit Workers • Reportable Major Events: <ul style="list-style-type: none"> ○ Revised Definition: Updated the major events definition to include fires and other relevant incidents, simplifying the section for easier readability. ○ Cross-References: Linked two major event incident details to the corresponding Collision and Injury subsections for clarity. • Location of Occurrence: Removed “rail yard” from locations and added a subsection excluding bus stops or shelters from “transit-owned” property. • Minimizing Exposure to Infectious Disease: Revised to address overall prevention, rather than COVID-19-specific measures. • De-Escalation Training: Added a new section addressing training requirements for staff. <p>Section 5 – Safety Management System (SMS)</p> <ul style="list-style-type: none"> • Key Staff Section: Revised to explicitly include frontline employee roles and responsibilities. • Safety Risk Mitigation: Updated to include measures addressing assaults and de-escalation techniques. 	December 2025

Accountable Executive Signature

Date