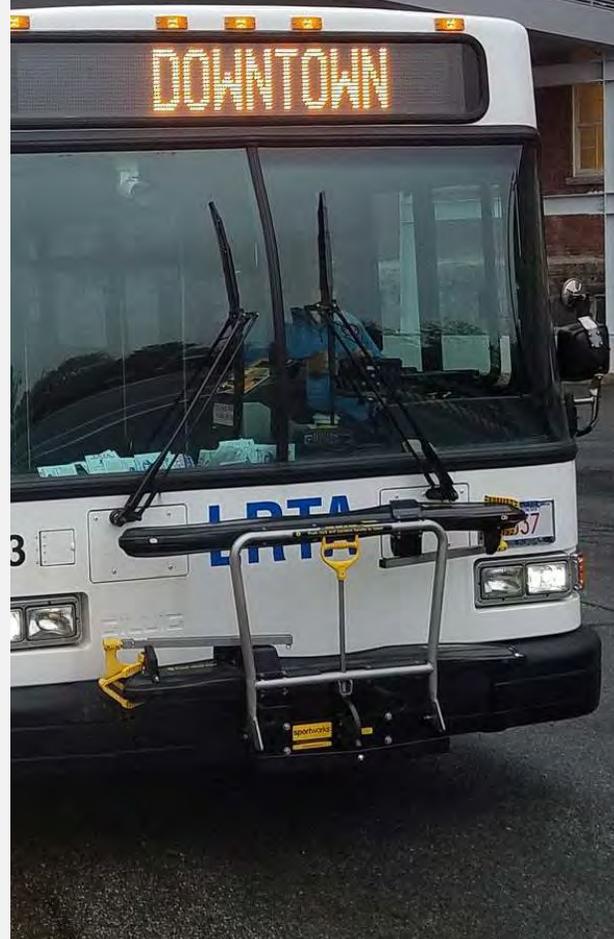


PUBLIC TRANSPORTATION AGENCY SAFETY PLAN



LOWELL REGIONAL TRANSIT
AUTHORITY

SEPTEMBER 2025



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Introduction

Public Transportation Agency Safety Plan

Safety is the number one priority at the Lowell Regional Transit Authority (LRTA). This Public Transportation Agency Safety Plan (PTASP) details the safety processes and procedures for the LRTA, utilizing existing agency safety practices and best practices implemented to meet the regulation set in 49 CFR Part 673 of the federal guidelines. This document and its updates will be maintained for a minimum of three years following their adoption and are subject to review by the FTA.

Transit Agency Information

Transit agency name and address	Lowell Regional Transit Authority (LRTA) 115 Thorndike Street Lowell, MA 01852
Name and title of Accountable Executive	David Bradley, Administrator
Name of Chief Safety Officer (CSO)	Ali Bent, Assistant Administrator

Mode(s) of service covered by this plan	<ul style="list-style-type: none"> • Fixed Route • Demand Response
Mode(s) of service provided by the Transit Agency (Directly Operated or Contracted Service)	<ul style="list-style-type: none"> • Fixed Route – Contracted Service (MB-PT) • Demand Response – Contracted Service (DR-PT)
FTA funding types	<ul style="list-style-type: none"> • 5307 • 5339
Does the Agency provide transit services on behalf of another transit agency or entity?	No
Does the Agency serve a large urbanized area?	Yes: <ul style="list-style-type: none"> • Boston MA-NH (1M+ pop.) • Nashua, NH-MA (200,000 – 1M pop.)

Plan Development, Approval, and Updates

Signatures, Approvals, and Certification

Is the Agency a small transportation provider?	Yes: <ul style="list-style-type: none"> ✓ 100 or fewer vehicles in peak revenue service ✓ Does not operate a rail fixed guideway public transportation system 	
	Name of the State entity that drafted the plan	Relevant documentation
	N/A – LRTA drafted and certifies its own plan	Appendix 1: MassDOT opt out letter
SIGNATURES AND APPROVALS		
Accountable Executive	David Bradley, LRTA Administrator	Date of signature
		9/16/25
Safety Committee	Relevant documentation	Date of approval
	Appendix 2: Safety Committee Approval	9/11/2025
LRTA Advisory Board	Relevant documentation	Date of approval
	Appendix 3: Advisory Board Approval	9/25/2025
Certification of Compliance	Name of the Individual/Entity that Certified this Plan	Lowell Regional Transit Authority
	Date of Certification	6/12/25
	Relevant documentation	Appendix 4: FY25 Certs & Assurances

Annual Review and Update of the PTASP

LRTA is committed to continuously improving safety by developing, implementing, and updating strategies and processes. Annually, the PTASP shall be reviewed to account for any updates to LRTA’s safety policies or procedures, and this process will be coordinated by the Chief Safety Officer (CSO). In July of each year, the CSO will initiate the annual review of the PTASP in coordination with the Safety Committee. The Safety Committee will set targets for the Safety Risk Reduction program based on the 3-year rolling average of the data submitted to the National Transit Database (NTD), which will be incorporated into a draft plan along with updated general performance safety targets. Any other necessary changes to the plan will be incorporated into the draft that will be provided to the Safety Committee for review and approval and signed by the Accountable Executive. The updated PTASP will be presented for final approval at the September meeting of the LRTA Advisory Board.

Annual Review and Update Process and Timeline

Date	Process	Tasks and Activities
July	CSO initiates annual review and update	<ul style="list-style-type: none"> • Pull safety data from National Transit Database, including data from 3 most recent years • Review any changes to safety regulations at the Federal and State level • Reference most recent Triennial Review Contractor's Manual • Review any applicable agency changes to safety-related policies, procedures, staffing, etc.
August	Target setting	<ul style="list-style-type: none"> • Safety Committee sets targets for safety risk reduction program based on 3-year rolling averages • CSO coordinates with management on general safety targets
	Prepare draft	<ul style="list-style-type: none"> • CSO prepares an initial draft incorporating new targets and other necessary changes • Draft is sent to the Safety Committee and management for review and comment
	Finalize draft	<ul style="list-style-type: none"> • Final review to ensure all feedback is incorporated
September	Approvals	<ul style="list-style-type: none"> • Safety Committee approves the final revision. CSO sends approved plan to Accountable Executive for signature • Accountable Executive signs the plan, adds approval to Advisory Board Meeting agenda

Date	Process	Tasks and Activities
		<ul style="list-style-type: none"> With Advisory Board approval, the revision is finalized
October	Update and review complete, revision filed	<ul style="list-style-type: none"> Revision is distributed to all employees, new hire paperwork updated as necessary CSO shares plan and targets with MassDOT and Northern Middlesex MPO

Revision History

Version Number and Updates			
Version Number	Section/Pages Affected	Reason for Change	Date Issued
1	All	New Document	9/1/20
2	Intro, 1,2,3,4,5,7	Annual review & update, new accountable executive	7/1/21
3	1,2,3,4,5,7	Annual review & update, BIL changes to PTASP rule	7/1/22
4	1,2	Annual review & update	7/1/23
5	All	Annual review & update; incorporating April 2024 changes to 49 CFR part 673	9/1/24
6	Safety Targets	Corrections to SPTs	12/4/2024
7	All	Annual review & update	9/5/2025

Safety Management System (SMS)

The Federal Transit Administration (FTA) has adopted the principles and methods of Safety Management Systems (SMS) as the basis for enhancing the safety of public transportation in the United States. LRTA began implementing the principles and methods of SMS when the PTASP regulation went into effect in 2019. SMS is a formal, organization-wide approach to managing safety risk and assuring the effectiveness of safety risk mitigation. It includes systematic procedures, practices, and policies for managing hazards and safety risk. LRTA’s SMS is scaled appropriately for its size, scope,

and complexity and includes the following components: Safety Management Policy, Safety Risk Management, Safety Assurance, and Safety Promotion.

Safety Management Policy

Safety Management Policy Statement

Safety is the number one priority at the LRTA, and we are committed as an agency to ensuring a safe environment for all passengers and staff. This document serves as a blueprint for maintaining safe and high-quality service for passengers and a safe work environment for employees.

The LRTA has established a joint labor-management Safety Committee to support the LRTA's Safety Management System. The Safety Committee consists of an equal number of frontline transit worker representatives and management representatives to give labor and management an equal voice. Labor-management coordination is vital to LRTA's proactive approach to safety and achieving its safety objectives.

The safety objectives of the LRTA include:

- Striving to reduce accidents, incidents, and other safety events that negatively impact LRTA service*
- Allocating resources and funds to properly address identified safety concerns and hazards*
- Creating and maintaining a robust employee safety reporting program that allows for clear communication of safety hazards between frontline workers and management.*
- Fostering cooperation and collaboration by establishing and maintaining a Safety Committee consisting of an equal number of frontline worker representatives and management representatives to oversee the LRTA's safety performance.*

*David Bradley
LRTA Administrator*

Safety Management Policy Communication

Copies of the PTASP are made available to staff and all contractors, and key safety policies are posted in common areas for both operations and maintenance staff. The policy will be distributed to all employees through a combination of postings and emails. LRTA incorporates an annual review and distribution of the PTASP, including the safety management policy into new-hire training.

Authorities, Accountabilities, and Responsibilities

Accountable Executive

- Is accountable for ensuring the SMS is effectively implemented throughout the system and action is taken, as necessary, to address substandard performance in the SMS
- Has ultimate responsibility for carrying out the PTASP and the Transit Asset Management (TAM) Plan
- Controls human and capital resources needed to develop and maintain the PTASP and TAM Plan
- Holds ultimate accountability for LRTA's safety performance
- Implements safety risk mitigations for the safety risk reduction program
- Receives and considers all other safety risk mitigations recommended by the Safety Committee

Chief Safety Officer (CSO)

- Designated by the Accountable Executive
- Holds a direct line of reporting to the Accountable Executive as the LRTA Assistant Administrator
- Develops Safety Plan (PTASP) and subsequent updates in coordination with the Safety Committee
- Has the authority and responsibility for day-to-day implementation and operation of SMS
- Monitoring contracted services and their implementation of the SMS
- Updating RTA management on PTASP related operation

Agency Leadership and Executive Management

Executive management roles with safety-related responsibilities include General Manager and Assistant General Manager of Fixed Route (contractor positions), General Manager of Paratransit (contractor position), and Maintenance Managers (contractor positions). While this leadership group has a diverse range of responsibilities, overarching safety-related responsibilities shared by this group include:

- Oversight of day-to-day operations and procedures related to the Safety Management System within each of their departments
- Modification of policies in their departments to be consistent with SMS implementation, as necessary
- Day-to-day oversight of the employee safety reporting program, as necessary
- Ensuring a consistent line of communication between front line employees and management concerning safety
- Ensuring that all employees are current on safety-related training

Key Staff

Key non-executive staff with significant safety responsibilities include operators, mechanics, facility managers, dispatchers, and fixed route bus service staff. These employees have a diverse range of responsibilities that support the Accountable Executive, CSO, and Safety Committee in developing, implementing, and operating the SMS. Overarching safety-related responsibilities shared by this group include:

- Reporting any identified safety concerns to management in a timely fashion
- Assessing service vehicles and facilities for hazards and defects
- Following and abiding by all LRTA safety policies and acting in accordance with the principles of the SMS

Safety Committee

The Safety Committee consists of an equal number of frontline employee representatives and management representatives. Members of the safety committee include:

Frontline employees:

1. Fixed Route driver representative selected by ATU Local 1578
2. Fixed Route driver representative selected by ATU Local 1578

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3. Fixed Route maintenance representative selected by ATU Local 1578
 4. Paratransit driver representative selected by Teamsters Local 170

Management:

1. Fixed Route General Manager
2. Fixed Route Assistant General Manager
3. Fixed Route Operations Coordinator
4. Paratransit General Manager

ATU Local 1578 selects the two Fixed Route representatives in accordance with Article 33 of the December 1, 2023 – June 30, 2027 Collective Bargaining Agreement. The Union Steward of Teamsters Local 170 names the Paratransit representative. The General Managers of Fixed Route and Paratransit select the Management Representatives.

Safety Committee Procedures

The Fixed Route and Paratransit members of the Safety Committee meet monthly, according to the availability of the front line and management representatives for each division. The minutes of these meetings are shared with the CSO, any safety hazards of immediate concern identified during these meetings are addressed by the General Managers and escalated to LRTA Administration as needed. LRTA Administration meets quarterly with the Safety Committee. The Quarterly Safety Meeting notices and agenda are developed by the CSO in coordination with the Safety Committee and posted in the both the Fixed Route and Paratransit staff rooms at least 48 hours in advance of the meeting, excluding Saturdays, Sundays and legal holidays. The CSO records the minutes of the Quarterly Safety Meeting and distributes the minutes to the Safety Committee. A copy of the minutes is kept for the PTASP file.

All members of the Safety Committee are required to complete SMS Awareness Training in addition to their comprehensive and refresher training program.

Members of the Safety Committee shall be paid for time spent by the applicable Contractor at the meetings.

The Safety Committee may coordinate with the Contractor, peer agencies, other transit workers, and if financial resources are needed to do so, the CSO and Accountable Executive, to access technical experts to serve in an advisory capacity as needed, as well as access to submissions to the transit worker safety reporting program.

Decisions made by the Safety Committee will be documented and recorded through the Safety Risk Management and Safety Assurance processes outlined in this PTASP. Should the Safety Committee determine a vote is necessary to reach a decision, the vote will be carried out in accordance with the respective Collective Bargaining Agreement(s).

The Safety Committee will follow the arbitration process from the applicable Collective Bargaining Agreement in the event of a dispute. The Accountable Executive may not be designated to resolve any disputes within the Safety Committee.

The Safety Committee may request a meeting at any time to coordinate directly with the Accountable Executive. Coordination and communication with the LRTA Advisory Board will be done through the Accountable Executive and in accordance with the Advisory Board by-laws.

The Safety Committee is responsible for:

- Reviewing and approving the LRTA’s PTASP and any updates to the PTASP;
- Setting annual performance targets for the safety risk reduction program;
- Identifying and recommending risk-based mitigations or strategies necessary to reduce the likelihood and severity of consequences identified through the agency’s safety risk assessment, including safety risk mitigations associated with any instance where the LRTA did not meet an annual safety performance target in the safety risk reduction program;
- Identifying mitigations or strategies that may be ineffective, inappropriate, or were not implemented as intended, including safety risk mitigations associated with any instance where the LRTA did not meet an annual safety performance target in the safety risk reduction program; and

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- Identifying safety deficiencies for purposes of continuous improvement, including any instance where the LRTA did not meet an annual safety performance target in the safety risk reduction program.

Transit Worker Safety Reporting Program

The LRTA has established a Transit Worker Safety Reporting Program that allows transit workers to report safety concerns, including assaults on transit workers, near-misses, and unsafe acts and conditions to senior management.

Both LRTA Fixed Route and Demand Response operations primarily rely on paper slips filled out by employees for anonymous reporting. All staff and customers can report conditions to the customer service email address (customerservice@lrta.com) posted on the LRTA website.

Employees throughout the agency are also encouraged to report any safety concerns verbally directly to management. LRTA has an open-door policy that encourages two-way communication between front-line employees and management. The Chief Safety Officer has primary responsibility for ensuring that all safety reports are addressed in a timely fashion and will coordinate with each General Manager to review employee reports on a periodic basis.

When action is taken to address a concern identified by an employee report that results in changes in policies or procedures, employees will be notified by either:

- Bulletins and posters posted in drivers' rooms
- A verbal update by the GM of each operation at monthly meetings
- Printed-out notices delivered to drivers (fixed route)

Employees that report safety concerns in good faith are protected from any retaliatory measures. However, LRTA may take disciplinary actions if the report contains any of the following employee activities:

- Willful participation in illegal activity, such as assault or theft;
- Gross negligence, such as knowingly utilizing heavy equipment for purposes other than intended such that people or property are put at risk; or,

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- Deliberate or willful disregard of regulations or procedures, such as reporting to work under the influence of controlled substances.

Safety Risk Management

The LRTA has adopted a decentralized approach to Safety Risk Management (SRM). Key personnel throughout the agency conduct the SRM process, supported by the Safety Committee, with oversight and assistance provided by the CSO and other executive staff members at LRTA. The General Managers of each operation have primary responsibility for ensuring that risks are identified and addressed in a timely fashion.

Hazard Identification

The LRTA relies on the following sources to identify hazards and potential consequences of the hazards:

- Accident reports
- Any safety concerns identified through the LRTA's safety assurance activities
- Customer feedback
- Data and information regarding exposure to infectious disease provided by the Centers for Disease Control and Prevention (CDC) and/or Massachusetts Department of Public Health (DPH)
- External information, including
 - Reports from FTA and other oversight authorities, which provide information based on Federal, State or local findings, research, considerations, or assessments
 - Reports from the public that contain verified safety information
 - Safety notices and information from manufacturers and transit associations
- Inspections (job duties, vehicles, or facilities)
- Investigations of safety events
- Maintenance reports
- Meetings with ADA rider representatives
- Observations from supervisors

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- Review of safety performance data
 - Transit Worker Safety Reporting Program
 - Vehicle camera footage

All hazards that are identified are documented to the extent possible in a timely fashion.

Safety Risk Assessment

Following the identification of hazards, assessment of safety risk is conducted on an ongoing basis by the Safety Committee and Chief Safety Officer, in consultation with relevant managers throughout the LRTA. Each hazard is analyzed based on the potential consequences the hazard could pose if not properly mitigated, and the assessment considers any existing safety risk mitigations. The following risk assessment matrices are used to guide discussions of risk assessments of the consequences of hazards to determine whether safety risk mitigations are necessary and inform the prioritization of mitigations.

Once the safety risk of a hazard is assessed using the categorizations below, mitigation strategies that align with the severity and likelihood of the safety problem are determined. If a mitigation is already in place to address the potential consequence of a hazard, the effectiveness of this mitigation is factored into the risk assessment. This process will generally take place under the supervision of the Chief Safety Officer and the General Manager of each operation. Hazard assessments and mitigation strategy effectiveness will be tracked in spreadsheet kept by CSO, and this will be reviewed at quarterly safety meetings.

Categorize Level of Severity

- A. Catastrophic - may cause death
- B. Critical - may cause severe illness, severe injury or major system loss
- C. Marginal - may cause minor injury
- D. Negligible - will not result in injury, illness or system damage

Categorize the Likelihood of Occurrence

- 1. Frequent – Likely to occur frequently
- 2. Probable – Likely to occur several times

3. Occasional – Likely to occur some time
4. Remote – Very unlikely to occur
5. Improbable – Almost inconceivable that event will occur

LRTA Risk Assessment Matrix

<i>Categorize severity and likelihood</i>		SEVERITY			
		Catastrophic (A)	Critical (B)	Marginal (C)	Negligible (D)
L I K E L I H O O D	Frequent (1)	High (1A)	High (1B)	Serious (1C)	Medium (1D)
	Probable (2)	High (2A)	High (2B)	Serious (2C)	Medium (2D)
	Occasional (3)	High (3A)	Serious (3B)	Medium (3C)	Low (3D)
	Remote (4)	Serious (4A)	Medium (4B)	Medium (4C)	Low (4D)
	Improbable (5)	Medium (5A)	Medium (5B)	Medium (5C)	Low (5D)

Safety Risk Mitigation

Following the safety risk assessment, the Safety Committee, in coordination with the Chief Safety Officer and/or the Accountable Executive as necessary will identify safety risk mitigations or strategies necessary to reduce the likelihood and/or severity of the potential consequences. Any hazards that pose a direct risk to operating safety are addressed immediately by the General Manager of each operation. For safety risk interventions that require larger capital expenditures to address structural issues, the Chief Safety Officer will consult with the Accountable Executive to ensure that funds can be used effectively to address the safety hazard at hand.

The LRTA relies on the following sources for safety risk mitigation:

- Best practices from peer agencies
- Input from technical/subject matter experts, as applicable
- Guidance provided by FTA and MassDOT
- Guidelines to prevent or control exposure to infectious diseases provided by the CDC and/or Massachusetts Department of Health
- Recommendations of the Safety Committee

If the Accountable Executive decides not to implement a mitigation recommended by the Safety Committee, the Accountable Executive shall prepare a written statement explaining their decision. The explanation shall be presented to the LRTA's Safety Committee and Advisory Board.

Safety Assurance

Safety Performance Monitoring and Measurement

Monitoring the System for Compliance with Procedures for Operations and Maintenance

Monitoring and oversight will be a responsibility of the Chief Safety Officer. LRTA executive staff meet monthly with the General Manager of each operation to discuss operational issues, including safety. Additionally, there are quarterly meetings with executive staff and the Safety Committee to discuss any ongoing safety risks, existing mitigations including those that may be ineffective, inappropriate, or not implemented as intended, and safety-related projects.

Other methods of monitoring for compliance at LRTA include:

- Analyzing operational and safety data to identify emerging safety concerns
- Internal Safety Audits
- Job performance observations
- Ongoing inspections of vehicles and facilities
- Tracking performance metrics

Monitoring Operations to Identify Safety Risk Mitigations that May Be Ineffective, Inappropriate, or Were Not Implemented as Intended

Monitoring safety risk mitigations is an important component of LRTA's overall safety strategy and helps ensure that hazards are being addressed in an appropriate and timely fashion. The Chief Safety Officer coordinates with the Safety Committee to ensure that mitigations are being implemented and if mitigations are effective, appropriate, and implemented as intended. Monitoring methods for identifying the efficacy of mitigation actions include:

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- Analyzing operational and safety data to identify emerging safety concerns;
 - Job performance observations;
 - Monitoring employee safety reporting;
 - Tracking performance metrics; and,
 - Reviewing results from accident, incident, and other safety event investigations, as well as reports from insurance companies;
 - Reviewing results of internal safety audits and inspections

Conducting Investigations of Safety Events, Including Identification of Causal Factors

LRTA investigates all safety events involving LRTA revenue vehicles. Any safety events that meet a State and/or Federal reporting threshold are reported to FTA and MassDOT as applicable

All accidents and incidents must be immediately reported to a supervisor. Accidents are investigated thoroughly and there is a detailed procedure for drivers and dispatchers to follow in the aftermath of any accident or incident, including documentation of all injuries and witnesses. A comprehensive accident report is compiled, which includes a root cause analysis and a determination of preventability. Additionally, the insurance company completes an independent investigation of each accident with its own determination of cause. Detailed accident/incident investigation policies are included in the Standard Operating Procedures for accident reporting for each mode of service.

Monitoring Information Reported Through Internal Safety Reporting Programs

The Chief Safety Officer, in coordination with the Safety Committee, 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 concerns are investigated or analyzed through the SRM process.

Continuous Improvement

Annual Safety Performance Assessment and Safety Set Aside

The LRTA reviews its safety performance annually, and the CSO provides a report to the Safety Committee and LRTA Advisory Board. Through the annual PTASP update and review process, the Chief Safety Officer coordinates with the Safety Committee to identify any deficiencies in the LRTA's SMS and its performance against its general safety and safety risk reduction program targets.

Under the direction of the Accountable Executive, the LRTA shall develop and carry out a plan to address any deficiencies identified through the annual safety performance assessment.

As a Section 5307 recipient that serves a large urbanized area, the LRTA must allocate as a safety set aside not less than 0.75 percent of section 5307 funds to eligible safety-related projects. As required under the Bipartisan Infrastructure Law and at 49 CFR § 673.27(d)(3)(iii), if the LRTA fails to meet a safety performance target under the safety risk reduction program, it must allocate the safety set aside in the following fiscal year to eligible projects that are reasonably likely to assist the LRTA in meeting the target. The annual safety performance assessment also informs how the safety set aside should be allocated.

Safety Promotion

Safety Training Program

The LRTA employs a comprehensive training program for all safety-sensitive staff and contractors, including transit workers and maintenance transit workers. The CSO reviews the safety training program on an annual basis with the General Manager of each operation to ensure that relevant staff are up to date on all trainings and that all contractor staff are receiving the training and guidance necessary to excel in their duties. This review is part of the annual PTASP update process.

Refresher training for staff is provided on an ongoing basis, with the frequency of re-training depending on the specific training module. The frequency of re-training is noted alongside each training described below.

Required safety trainings for operators include:

- Traffic regulations (annually)
- Defensive driving and accident prevention (annually)
- Basic driving maneuvers (annually)
- Safety and Security training including Terrorist Activity Recognition and Response (TARR), Code Red, Code Blue and Homeland Security Readiness Alert levels (annually) Wheelchair Securement/Lift Training (annually)
- De-Escalation training
- Safety Concern identification and reporting

Required safety trainings for maintenance staff include:

- Right to Know (annually)
- Hazard Communication (annually)
- Bloodborne Pathogen (annually)
- Respirator Training (annually)
- Viral Control and Vehicle Cleaning (annually)

Paratransit Driver Training:

- Defensive Driving (every 2 years)
- Disability Awareness (every 3 years)
- Accessible Lift/Passenger Securement (every 2 years)
- 20 hours of on-road observation
- 20 hours of Behind the Wheel driving
- Safety Concern identification and reporting

Training Videos:

- Certified Wheelchair Securement training (every 2 years)
- Certified First AID and CPR training
- De-Escalation training

More information on safety-related trainings can be found in the Fixed-Route Training Program, Paratransit Training Program, and the Massachusetts Transit Assistance Program.

Safety Communication

Communication between managers and frontline staff is a critical component of safety communication at LRTA. LRTA is committed to thoroughly communicating its safety policies, procedures, performance, and results of the Safety Committee activities, as well as ensuring that contractors are consistently conveying information related to hazards and safety risks relevant to employees' roles and responsibilities to its staff. Safety policies, directives, and procedures are communicated to staff through a variety of different methods, including:

- Bulletins detailing safety policies and procedures posted in common areas for drivers and maintenance staff
- Flyers and notices distributed to staff at regular meetings detailing major safety policy or procedure information or changes
- Frequent radio communications to drivers on the road
- Memos and notices delivered to operator mailboxes

Quarterly safety meetings with executive staff and the Safety Committee serve as a consistent outlet for communication between managers to discuss ongoing safety issues.

Safety Risk Reduction Program

As a recipient of Section 5307 funds that serves an urbanized area with a population of 200,000 or more, LRTA is required to include a safety risk reduction program for transit operations in its PTASP. The safety risk reduction program aims to improve safety performance by reducing the number and rates of accidents, injuries, and assaults on transit workers. **Safety risk mitigations recommended by the Safety Committee, that are based on a safety risk assessment and part of the safety risk reduction program, must be included in the PTASP and implemented by the Accountable Executive.**

When the Safety Committee recommends a safety risk mitigation unrelated to the

safety risk reduction program, and the Accountable Executive decides not to implement the mitigation, the Accountable Executive shall prepare a written statement explaining their decision. The explanation shall be presented to the LRTA's Safety Committee and Advisory Board.

Reduction and Mitigation of Vehicular and Pedestrian Safety Events Involving Transit Vehicles

When identifying safety risk mitigations for the safety risk reduction program related to vehicular and pedestrian safety events involving transit vehicles, including to address a missed safety risk reduction program performance target, the LRTA and its Safety Committee consider mitigations to reduce visibility impairments for operators that contribute to accidents, including retrofits to vehicles in revenue service and specifications for future procurements that reduce visibility impairments:

- Ten fixed route buses will be piloting Safe Fleet's MirrorLESS Vision System, as part of the bus specification with GILLIG LLC. This system includes high-resolution and high-dynamic range cameras that aims to give operators a clear, midday view under any light or weather conditions, eliminate lateral blind spots and allow operators to better distinguish objects and obstacles with real-time, wide-angle views, and reduce glare. It also includes the ability to capture high-definition video for reliable incident documentation and analysis.
 - The Safety Committee will consider operator feedback and safety performance over the duration of the pilot to determine if the MirrorLESS system is an effective mitigation and should be incorporated into the specification for future bus procurements.
- The following existing mitigations have been determined to be effective and will be continuously monitored:
 - LRTA has incorporated BRT-style front ends and LED headlights into its bus specifications. The larger window and brighter lighting increase driver visibility.
 - LRTA maintenance installed a headlight alignment board in 2022 to ensure headlights are properly aligned for optimal visibility.

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- Rear ICC reflectors have been added to the back of all buses to assist motorists and pedestrians in seeing the buses at night and in cloudy weather.
 - Operator training will now include Smith System safety training, aimed at reducing collisions. A supervisor will be trained as a trainer for new hires and refresher training.

Reduction and Mitigation of Assaults on Transit Workers

LRTA is committed to providing a safe operating environment for its transit workers, and recognizes that the interaction with passengers, patrons, and the public, as well as the need to clarify and enforce LRTA policies, is a hazard with potential consequences including assault. When identifying safety risk mitigations for the safety risk reduction program related to assaults on transit workers, including to address a missed safety risk reduction program performance target, the LRTA and the Safety Committee consider the deployment of assault mitigations infrastructure and technology in its vehicles and facilities, including barriers to restrict the unwanted entry of individuals and objects into the workstation of bus operators. In response to FTA General Directive 24-1, the LRTA Safety Committee completed a safety risk assessment in December 2024 regarding transit worker assault. The likelihood and severity were determined to be remote and marginal for an overall medium risk. As a result of the safety risk analysis, the Safety Committee considered the following mitigations:

- Operator area protective barriers (determined to be unnecessary)
- Signage informing riders of surveillance (existing mitigation determined to be effective)
- De-Escalation training (existing mitigation determined to be effective)
- Operating policies and procedures for communicating with dispatch/law enforcement during escalating situations and securing vehicles, dispatch area, and operations facilities (existing mitigation determined to be effective)
- Video/Audio Surveillance (existing mitigation determined to be effective)
- Cover/Overt Emergency Alarms (determined to be unnecessary)
- Automatic Vehicle Location (existing mitigation determined to be effective)
- Patrol strategies (determined to be unnecessary)
- Communication protocols (existing mitigation determined to be effective)

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- Public Awareness Campaigns (determined to be unnecessary)

The Safety Committee will continue to monitor the safety risk of assaults on transit workers and will take action if the safety risk increases and/or the existing mitigations become ineffective.

Safety Performance Targets

Safety performance measures help support safety risk management and safety assurance processes. The Safety Assurance component of a Safety Management System (SMS) leverages a structured approach of planning, identifying safety performance measures, conducting data analysis, setting safety performance targets, and monitoring safety performance. Safety performance measures provide the basis for continuous safety improvement.

In compliance with the Public Transportation Agency Safety Plans (PTASP) regulation, at 49 CFR part 673 (part 673), LRTA includes annual safety performance targets (SPTs) based on the safety performance measures established in the National Public Transportation Safety Plan (National Safety Plan) (§ 673.11(a)(3)) in its Public Transportation Agency Safety Plan (PTASP). LRTA uses SPTs to monitor and assess the safety performance of its public transit systems.

On April 10, 2024, FTA published an update to the National Safety Plan to address requirements in the Bipartisan Infrastructure Law, enacted as the Infrastructure Investment and Jobs Act (Public Law 117-58). The updated National Safety Plan establishes performance measures for PTASPs to improve the safety of public transportation systems that receive Federal financial assistance from FTA.

National Safety Plan Safety Performance Measures

Safety Performance Measures for All Agencies Subject to the PTASP Regulation

The National Safety Plan identifies 14 safety performance measures for all agencies subject to the PTASP regulation. There are two kinds of safety performance measures

established in the National Safety Plan: total number measures, or measures of the total number of instances (for example, total number of major events, total number of collisions, etc.), and rate measures, or measures of the rate of instances.

Safety Performance Measures Required by the National Safety Plan

#	Measure	Description
1	1a: Major Events	All safety and security major events as defined by the NTD.
2	1b: Major Event Rate	All safety and security major events, divided by VRM.
3	1.1: Collision Rate	All collisions reported to the NTD, divided by VRM.
4	1.1.1: Pedestrian Collision Rate	All collisions “with a person,” as defined by the NTD, divided by VRM.
5	1.1.2: Vehicular Collision Rate	All collisions “with a motor vehicle,” as defined by the NTD, divided by VRM.
6	2a: Fatalities	All fatalities as defined by the NTD
7	2b: Fatality Rate	All fatalities as defined by the NTD, divided by VRM
8	2.1: Transit Worker Fatality Rate	All transit worker fatalities as defined by the NTD, including the categories “Transit Employee/Contractor,” “Transit Vehicle Operator,” and “Other Transit Staff,” divided by VRM.
9	3a: Injuries	All injuries as defined by the NTD.
10	3b: Injury Rate	All injuries as defined by the NTD, divided by VRM.
11	3.1: Transit Worker Injury Rate	All transit worker injuries as defined by the NTD, including the categories “Transit Employee/Contractor,” “Transit Vehicle Operator,” and “Other Transit Staff,” divided by VRM.
12	4a: Assaults on Transit Workers	All assaults on transit workers as defined by the NTD.
13	4b: Rate of Assaults on Transit Workers	All assaults on transit workers as defined by the NTD, divided by VRM.
14	5: System Reliability	The mean distance between major mechanical system failures as defined by the NTD.

Safety Performance Measures for Safety Risk Reduction Programs

As a large urbanized area (UZA) provider (recipient of financial assistance under 49 U.S.C. 5307 (Section 5307) that serves an urban area with a population of 200,000 or more), LRTA includes a safety risk reduction program in its PTASP as required by the Bipartisan Infrastructure Law. In the National Safety Plan, FTA identified eight safety performance measures that the LRTA Safety Committee uses to set targets for the safety risk reduction program.

Safety Risk Reduction Program Safety Performance Measures

#	Measure	Description
1	Major Events	All safety and security major events as defined by the NTD.
2	Major Event Rate	All safety and security major events, divided by VRM.
3	Collisions	All collisions reported to the NTD.
4	Collision Rate	All collisions reported to the NTD, divided by VRM.
5	Injuries	All injuries as defined by the NTD.
6	Injury Rate	All injuries as defined by the NTD, divided by VRM.
7	Assaults on Transit Workers	All assaults on transit workers as defined by the NTD.
8	Rate of Assaults on Transit Workers	All assaults on transit workers as defined by the NTD, divided by VRM.

Some of the performance measures for the safety risk reduction program overlap with the measures for all agencies subject to the PTASP regulation. LRTA has opted to use the same safety performance target set by the Safety Committee for the safety risk reduction program to satisfy the general safety performance target requirement for overlapping measures.

The target for the safety risk reduction program must be based on a three-year rolling average of the data the LRTA submits to the National Transit Database (NTD) and must reflect an annual reduction in the associated safety performance measure. Thus, the SPT must be set below the three-year rolling average.

When an annual safety performance target set by the Safety Committee for the safety risk reduction program is not met, the Chief Safety Officer coordinates with the Safety Committee, and Accountable Executive as necessary, to:

- Assess the associated safety risk by determining the severity and likelihood of potential consequences;
- Mitigate the associated safety risk with mitigations and/or strategies that reduce the severity and/or likelihood of the potential consequences; and
- Allocate its safety set-aside in the following fiscal year to safety-related projects eligible under 49 U.S.C. 5307 that are reasonably likely to assist the LRTA in meeting the safety performance target in the future.

LRTA Safety Performance Targets

SPTs Related to Major Events

A major event is a safety or security event that meets any NTD reporting threshold and occurs at a transit revenue facility, maintenance facility, or rail yard; on transit right-of-way or infrastructure; during a transit-related maintenance activity; or involves a transit revenue vehicle

NTD Reportable Thresholds:

- Fatalities: Confirmed within 30 days; Includes suicides
- Injuries: Immediate transport away from the scene for medical attention for 1 or more persons
- Property Damage: Estimated property damage equal to or exceeding \$25,000
- Collisions that:
 - Meet an injury, fatality, property damage, or evacuation threshold;
 - Involve a transit revenue vehicle and the towing away of any vehicles (transit or non-transit) from the scene;
 - Include suicides, attempted suicides, assaults, or homicides resulting in an injury or fatality that involve contact with a transit vehicle; or
 - Includes collisions that do not involve a transit revenue vehicle but meet a threshold
- Evacuation of a transit facility or vehicle for life-safety reasons

Major Events

The targets for major events total and major events rate fall under the safety risk reduction program; thus, they reflect an annual reduction based on the 3-year rolling average. The target rates are calculated based on projected revenue miles of 443,000 per year for Demand Response and 1,210,000 per year for Fixed Route.

Demand Response		
Year	Vehicle Revenue Miles	Major Events Total
2022	508,108	0
2023	432,997	0
2024	402,090	0
2022-2024 average: 0		
2022-2024 rate: 0.0		
Targets 0 major events per calendar year 0 major events per 1M VRM		

Fixed Route		
Year	Vehicle Revenue Miles	Major Events Total
2022	955,740	5
2023	953,117	3
2024	1,069,683	0
2022-2024 average: 2.67		
2022-2024 rate: 2.69		
Targets 2 major events per calendar year 1.65 major events per 1M VRM		

Collisions

The targets for collisions total and rate of collisions fall under the safety risk reduction program; thus, they reflect an annual reduction based on the 3-year rolling average. The target rates are calculated based on projected revenue miles of 443,000 per year for Demand Response and 1,210,000 per year for Fixed Route. LRTA is also required to set targets for pedestrian collision rate and vehicular collision rate under the general safety performance measures. Demand response target rates are based on 0 pedestrian and vehicular collisions, while Fixed Route rates were calculated using 1 vehicular collision and 1 pedestrian collision per year.

Demand Response		
Year	Vehicle Revenue Miles	Collisions Total
2022	508,108	0
2023	432,997	0
2024	402,090	0
2022-2024 average: 0		

Fixed Route		
Year	Vehicle Revenue Miles	Collisions Total
2022	955,740	5
2023	953,117	3
2024	1,069,683	0
2022-2024 average: 2.67		

Demand Response
<i>2022-2024 rate: 0.0</i>
Targets
0 collisions per calendar year
0 collisions per 1M VRM
0 pedestrian collisions per 1M VRM
0 vehicular collisions per 1M VRM

Fixed Route
<i>2022-2024 rate: 2.69</i>
Targets
2 collisions per calendar year
1.65 collisions per 1M VRM
0.83 pedestrian collisions per 1M VRM
0.83 vehicular collisions per 1M VRM

SPTs Related to Fatalities

The targets for fatalities, rate of fatalities, and rate of transit worker fatalities are not included in the safety risk reduction program and do not need to be based on the 3-year rolling average. **LRTA has set a target of 0 total fatalities, 0 fatalities per one million revenue miles, and 0 transit worker fatalities per one million revenue miles across all modes of service.**

SPTs Related to Injuries

The targets for injuries total and rate of injuries fall under the safety risk reduction program; thus, they reflect an annual reduction based on the 3-year rolling average. The target rates are calculated based on projected revenue miles of 443,000 per year for Demand Response and 1,210,000 per year for Fixed Route.

LRTA is also required to set a target for transit worker injury rate under the general safety performance measures. Demand response and Fixed Route rates were calculated using 0 transit worker injuries per year.

Demand Response		
Year	Vehicle Revenue Miles	Injuries Total
2022	508,108	0
2023	432,997	0
2024	402,090	0
<i>2022-2024 average: 0</i>		
<i>2022-2024 rate: 0.0</i>		
Targets		
0 injuries per calendar year		
0 injuries per 1M VRM		
0 transit worker injuries per 1M VRM		

Fixed Route		
Year	Vehicle Revenue Miles	Injuries Total
2022	955,740	3
2023	953,117	5
2024	1,069,683	1
<i>2022-2024 average: 3.00</i>		
<i>2022-2024 rate: 3.02</i>		
Targets		
2 injuries per calendar year		
1.65 injuries per 1M VRM		
0 transit worker injuries per 1M VRM		

SPTs Related to Assaults on Transit Workers

The targets for total number of assaults on transit workers and rate of assaults on transit workers fall under the safety risk reduction program; thus, they reflect an annual reduction based on the 3-year rolling average. The target rates are calculated based on projected revenue miles of 443,000 per year for Demand Response and 1,210,000 per year for Fixed Route.

Demand Response			Fixed Route		
Year	Vehicle Revenue Miles	Assaults Total	Year	Vehicle Revenue Miles	Assaults Total
2022	508,108	0	2022	955,740	0
2023	432,997	0	2023	953,117	1
2024	402,090	0	2024	1,069,683	7
<i>2022-2024 average: 0</i>			<i>2022-2024 average: 2.67</i>		
<i>2022-2024 rate: 0.0</i>			<i>2022-2024 rate: 2.69</i>		
Targets 0 assaults per calendar year 0 assaults per 1M VRM			Targets 2 assaults per calendar year 1.65 assaults per 1M VRM		

SPTs Related to System Reliability

System reliability is measured as the mean distance (VRM) between major mechanical system failures. The Safety risk reduction program does not include safety performance measures related to system reliability.

LRTA set system reliability targets using historical data and taking into consideration current vehicle replacement schedules and operating environments. **The target for Demand Response is 89,000 VRM between major failures, and the target for Fixed Route is 173,000 VRM between major failures.**

Safety Performance Targets Summary

General Annual Safety Performance Targets

Category	Safety Performance Measure	LRTA Targets	
		Demand Response	Fixed Route
Major Events	Major Events	0	2
	Major Event Rate	0.0	1.65
	Collision Rate	0.0	1.65
	Pedestrian Collision Rate	0.0	0.83
	Vehicular Collision Rate	0.0	0.83
Fatalities	Fatalities	0	0
	Fatality Rate	0.0	0.0
	Transit Worker Fatality Rate	0.0	0.0
Injuries	Injuries	0	2
	Injury Rate	0.0	1.65
	Transit Worker Injury Rate	0.0	0.0
Assaults on Transit Workers	Assaults on Transit Workers	0	2
	Rate of Assaults on Transit Workers	0.0	1.65
System Reliability	Miles between major failures	89,000	173,000

Annual Safety Performance Targets for the Safety Risk Reduction Program

Safety Performance Measure	LRTA Targets	
	Demand Response	Fixed Route
Major Events	0	2
Major Events Rate	0.0	1.65
Collisions	0	2
Collision Rate	0.0	1.65
Injuries	0	2
Injury Rate	0.0	1.65
Assaults on Transit Workers	0	2
Rate of Assaults on Transit Workers	0.0	1.65

Coordination with Metropolitan and Statewide Planning Processes

Safety Performance Target Coordination

The Accountable Executive and/or CSO share the PTASP, including safety performance targets, with the Metropolitan Planning Organization (MPO) in our service area each year after its formal adoption by the LRTA Advisory Board to aid in the planning process. A copy of our formally adopted PTASP is also provided to the Massachusetts Department of Transportation (MassDOT). LRTA staff are available to coordinate with MassDOT and the MPO in the selection of MassDOT and MPO safety performance targets upon request.

Targets Transmitted to the State	State Entity Name	Date Targets Submitted
	MassDOT	See Appendix 5: PTASP Transmittal
Targets Transmitted to the MPO	MPO Name	Date Targets Submitted
	Northern Middlesex MPO	See Appendix 5: PTASP Transmittal

Additional Information

Supporting Documentation

- Accident Reporting Policy for MassDOT-Awarded Vehicles with a Lien
- Driver training for recipients of vehicles through MassDOT’s [Community Transit Grant Program](#)
- Fixed Route Standard Operating Procedures
- Fixed Route Training Program
- Paratransit Standard Operating Procedures
- Paratransit Training Program

At all times the LRTA shall maintain, for a minimum of three years, documents that set forth its PTASP, including those related to the implementation of its SMS and results

from SMS processes and activities. LRTA shall maintain, for a minimum of three years, documents included in whole, or by reference, that describe the programs, policies, and procedures that the LRTA uses to carry out its PTASP. These documents will be made available upon request by FTA or other Federal entity and MassDOT.

Definitions of Special Terms Used in the PTASP

Term	Definition
Accountable Executive	A single, identifiable person who has ultimate responsibility for carrying out the Public Transportation Agency Safety Plan of a transit agency; responsibility for carrying out the transit agency's Transit Asset Management Plan; and control or direction over the human and capital resources needed to develop and maintain both the transit agency's Public Transportation Agency Safety Plan, in accordance with 49 U.S.C. 5329(d), and the transit agency's Transit Asset Management Plan in accordance with 49 U.S.C. 5326.
Assault on a transit worker	As defined under 49 U.S.C. 5302, a circumstance in which an individual knowingly, without lawful authority or permission, and with intent to endanger the safety of any individual, or with a reckless disregard for the safety of human life, interferes with, disables, or incapacitates a transit worker while the transit worker is performing the duties of the transit worker.
Chief Safety Officer (CSO)	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.
Direct recipient	An entity that receives Federal financial assistance directly from the Federal Transit Administration.
Emergency	As defined under 49 U.S.C. 5324, a natural disaster affecting a wide area (such as a flood, hurricane, tidal wave, earthquake, severe storm, or landslide) or a catastrophic failure from any external cause, as a result of which the Governor of a State has declared an emergency and the Secretary has concurred; or the President has declared a major disaster under section 401 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. 5170).
Equivalent entity	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.
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.
Injury	Any harm to persons as a result of an event that requires immediate medical attention away from the scene.
Investigation	The process of determining the causal and contributing factors of a safety event or hazard, for the purpose of preventing recurrence and mitigating safety risk.
Joint labor-management process	A formal approach to discuss topics affecting transit workers and the public transportation system.
Large urbanized area provider	A recipient or subrecipient of financial assistance under 49 U.S.C. 5307 that serves an urban area with a population of 200,000 or more as determined by the most recent decennial Census.

Major mechanical failure	A failure of some mechanical element of the revenue vehicle that prevents the vehicle from completing a scheduled revenue trip or starting the next scheduled revenue trip because vehicle movement is limited or due to safety concerns.
National Public Transportation Agency 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.
Near-miss	A narrowly avoided safety event.
Operator of a public transportation system	A provide of public transportation.
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.
Potential consequence	The effect of a hazard.
Public transportation	As defined under 49 U.S.C. 5302, regular, continuing shared-ride surface transportation services that are open to the general public or open to a segment of the general public defined by age, disability, or low income; and does not include: (1) Intercity passenger rail transportation provided by the entity described in 49 U.S.C. chapter 243 (or a successor to such entity); (2) Intercity bus service; (3) Charter bus service; (4) School bus service; (5) Sightseeing service; (6) Courtesy shuttle service for patrons of one or more specific establishments; or (7) Intra-terminal or intra-facility shuttle services.
Public Transportation Agency Safety Plan	The documented comprehensive agency safety plan for a transit agency that is required by 49 U.S.C. 5329 and this part.
Recipient	A State or local governmental authority, or any other operator of a public transportation system, that

	receives financial assistance under 49 U.S.C. chapter 53.
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 Committee	The formal joint labor-management committee on issues related to safety that is required by 49 U.S.C. 5329 and this part.
Safety event	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.
Safety Management Policy	A transit agency's documented commitment to safety, which defines the transit agency's safety objectives and the accountabilities and responsibilities for the management of safety.
Safety Management System (SMS)	The formal 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 hazards and safety risk.
Safety performance target	A quantifiable level of performance or condition, expressed as a value for the measure, related to safety management activities, to be achieved within a specified time period.
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	The composite of predicted severity and likelihood of a potential consequence of a hazard.
Safety Risk Assessment	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	A process within a transit agency's Public Transportation Agency Safety Plan for identifying hazards and analyzing, assessing, and mitigating the safety risk. of their potential consequences.
Safety Risk Mitigation	A method or methods to eliminate or reduce the severity and/or likelihood of a potential consequence of a hazard.
Safety set-aside	The allocation of not less than 0.75 percent of assistance received by a large urbanized area provider under 49 U.S.C. 5307 to safety-related projects eligible under 49 U.S.C. 5307.
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 across all non-rail fixed route modes or in any one non-fixed route mode 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	The condition in which a capital asset is able to operate at a full level of performance.
Subrecipient	An entity that receives Federal transit grant funds indirectly through a State or a direct recipient.
Transit agency	An operator of a public transportation system that is a recipient or subrecipient of Federal financial assistance under 49 U.S.C. 5307 or a rail transit agency.
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.

Transit worker	Any employee, contractor, or volunteer working on behalf of the transit agency.
Urbanized area	As defined under 49 U.S.C. 5302, an area encompassing a population of 50,000 or more that has been defined and designated in the most recent decennial census as an urban area by the Secretary of Commerce.

List of Acronyms Used in the PTASP

Acronym	Word or Phrase
ADA	American’s with Disabilities Act of 1990
ASP	Agency Safety Plan (also referred to as PTASP in Part 673)
ATU	Amalgamated Transit Union. ATU Local 1578 represents Fixed Route employees
CDC	Centers for Disease Control and Prevention of the United States Department of Health and Human Services.
CFR	Code of Federal Regulations
ESRP	Employee Safety Reporting Program
FTA	Federal Transit Administration, an operating administration within the United States Department of Transportation.
LRTA	Lowell Regional Transit Authority
MassDOT	Massachusetts Department of Transportation
MPO	Metropolitan Planning Organization
NTD	National Transit Database. FTA set up the NTD to be the repository of data about the financial, operating and asset conditions of American transit systems, helping to keep track of the industry and provide public information and statistics. FTA uses NTD data to apportion funding to urbanized and rural areas in the United States.
PTASP	Public Transportation Agency Safety Plan
SMS	Safety Management System
SRM	Safety Risk Management
VRM	Vehicle Revenue Miles

Part 673	49 CFR Part 673 (Public Transportation Agency Safety Plan)
U.S.C.	United States Code

Appendix 1: MassDOT opt out letter

I, James Scanlan, of Lowell Regional Transit Authority (RTA), choose to opt-in to creating and certifying our own individualized Public Transportation Agency Safety Plan for the Federal Transit Administration (with technical assistance from MassDOT). I understand that by creating our own individualized plan I will not be included in MassDOT's Statewide Plan.

I also understand that my RTA will be responsible for annually reviewing and updating my RTA's Public Transportation Agency Safety Plan and self-certifying the updated plan for the Federal Transit Administration.

Regional Transit Authority Representative Signature: _____



Date: _____

3/5/20

Appendix 2: Safety Committee Approval



David Bradley
Administrator

115 Thorndike Street • Lowell, MA 01852
978-459-0164 • Fax: 978-458-9673

PUBLIC TRANSPORTATION AGENCY SAFETY PLAN ANNUAL UPDATE

SAFETY COMMITTEE APPROVAL

The Lowell Regional Transit Authority Safety Committee has reviewed this September 2025 update of the Public Transportation Agency Safety Plan, which includes the targets for the Safety Risk Reduction Program as set by the Safety Committee and recommends approval by the LRTA Advisory Board.

APPROVED BY:

Signature

Date

Bryant Euler, Jr., Maintenance

9-5-25

Lisa Lipomi, Operator

9-5-25

LeeAnn Maille, Operator

9-10-25

Dianne Weissbach, Operator

9/11/25

George Anastas, General Manager

9-5-2025

Timothy Bomil, Operations Coordinator

9-5-25

John Bronski, General Manager

9-11-25

Dawn Marvin, Asst. General Manager

9-5-25

Appendix 3: Advisory Board Approval



David Bradley
Administrator

115 Thorndike Street • Lowell, MA 01852
978-459-0164 • Fax: 978-458-9673

PUBLIC TRANSPORTATION AGENCY SAFETY PLAN ANNUAL UPDATE

ADVISORY BOARD APPROVAL

I certify that the LRTA Advisory Board approved by vote the September 2025 update to the Lowell Regional Transit Authority Public Transportation Agency Safety Plan (PTASP) at the meeting of the Advisory Board on September 25, 2025.

Authorized LRTA Advisory Board Representative:

Signature:

Tom Bernil

Print Name:

Tom Bernil

Title:

Chairman

Date:

9-25-25

Appendix 4: FY25 Certs & Assurances

Not every provision of every certification will apply to every applicant or award. If a provision of a certification does not apply to the applicant or its award, FTA will not enforce that provision.

Text in italic is not part of a certification and is of no legal effect. Its purpose is to provide explanation and context for the certification.

CATEGORY 1. CERTIFICATIONS AND ASSURANCES REQUIRED OF EVERY APPLICANT.

All applicants must make the certifications in this category.

1.1. Standard Assurances.

The certifications in this subcategory appear as part of the applicant's registration or annual registration renewal in the System for Award Management (SAM.gov) and on the Office of Management and Budget's standard form 424B "Assurances—Non-Construction Programs". This certification has been modified in places to include analogous certifications required by U.S. DOT statutes or regulations.

As the duly authorized representative of the applicant, you certify that the applicant:

- (a) Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.
- (b) Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
- (c) Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
- (d) Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
- (e) Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§ 4728–4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 CFR 900, Subpart F).
- (f) Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to:

- (1) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin, as effectuated by U.S. DOT regulation 49 CFR Part 21, including any amendments thereto;
 - (2) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§ 1681–1683, and 1685–1686), which prohibits discrimination on the basis of sex, as effectuated by U.S. DOT regulation 49 CFR Part 25;
 - (3) Section 5332 of the Federal Transit Law (49 U.S.C. § 5332), which prohibits any person being excluded from participating in, denied a benefit of, or discriminated against under, a project, program, or activity receiving financial assistance from FTA because of race, color, religion, national origin, sex, disability, or age.
 - (4) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. § 794), which prohibits discrimination on the basis of handicaps, as effectuated by U.S. DOT regulation 49 CFR Part 27;
 - (5) The Age Discrimination Act of 1975, as amended (42 U.S.C. §§ 6101–6107), which prohibits discrimination on the basis of age;
 - (6) The Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse;
 - (7) The comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91–616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism;
 - (8) Sections 523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§ 290 dd-3 and 290 ee-3), as amended, relating to confidentiality of alcohol and drug abuse patient records;
 - (9) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§ 3601 et seq.), as amended, relating to nondiscrimination in the sale, rental, or financing of housing;
 - (10) Any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and,
 - (11) the requirements of any other nondiscrimination statute(s) which may apply to the application.
- (g) Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (“Uniform Act”) (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases. The requirements of the Uniform Act are effectuated by U.S. DOT regulation 49 CFR Part 24.
- (h) Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§ 1501–1508 and 7324–7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

- (i) Will comply, as applicable, with the provisions of the Davis–Bacon Act (40 U.S.C. §§ 276a to 276a-7), the Copeland Act (40 U.S.C. § 276c and 18 U.S.C. § 874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§ 327–333), regarding labor standards for federally assisted construction sub-agreements.
- (j) Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
- (k) Will comply with environmental standards which may be prescribed pursuant to the following:
 - (1) Institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514;
 - (2) Notification of violating facilities pursuant to EO 11738;
 - (3) Protection of wetlands pursuant to EO 11990;
 - (4) Evaluation of flood hazards in floodplains in accordance with EO 11988;
 - (5) Assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§ 1451 et seq.);
 - (6) Conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§ 7401 et seq.);
 - (7) Protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and
 - (8) Protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93–205).
- (l) Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§ 1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
- (m) Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. § 470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§ 469a-1 et seq.).
- (n) Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
- (o) Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§ 2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.

- (p) Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§ 4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
- (q) Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and 2 CFR Part 200, Subpart F, “Audit Requirements”, as adopted and implemented by U.S. DOT at 2 CFR Part 1201.
- (r) Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing the program under which it is applying for assistance.
- (s) Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. § 7104) which prohibits grant award recipients or a subrecipient from:
 - (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect;
 - (2) Procuring a commercial sex act during the period of time that the award is in effect; or
 - (3) Using forced labor in the performance of the award or subawards under the award.

1.2. Standard Assurances: Additional Assurances for Construction Projects.

This certification appears on the Office of Management and Budget’s standard form 424D “Assurances—Construction Programs” and applies specifically to federally assisted projects for construction. This certification has been modified in places to include analogous certifications required by U.S. DOT statutes or regulations.

As the duly authorized representative of the applicant, you certify that the applicant:

- (a) Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency; will record the Federal awarding agency directives; and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure nondiscrimination during the useful life of the project.
- (b) Will comply with the requirements of the assistance awarding agency with regard to the drafting, review, and approval of construction plans and specifications.
- (c) Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work confirms with the approved plans and specifications, and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.

1.3. Procurement.

The Uniform Administrative Requirements, 2 CFR § 200.325, allow a recipient to self-certify that its procurement system complies with Federal requirements, in lieu of submitting to certain pre-procurement reviews.

The applicant certifies that its procurement system complies with:

- (a) U.S. DOT regulations, “Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards,” 2 CFR Part 1201, which incorporates by reference U.S. OMB regulatory guidance, “Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards,” 2 CFR Part 200, particularly 2 CFR §§ 200.317–200.327 “Procurement Standards;
- (b) Federal laws, regulations, and requirements applicable to FTA procurements; and
- (c) The latest edition of FTA Circular 4220.1 and other applicable Federal guidance.

1.4. Increased Micro-Purchase Threshold.

A recipient may establish a micro-purchase threshold that is higher than the Federal micro-purchase threshold. Pursuant to 2 CFR § 200.320(a)(1)(iv), the recipient may self-certify a micro-purchase threshold up to \$50,000. Pursuant to 2 CFR § 200.320(a)(1)(v), the recipient may set a micro-purchase threshold higher than \$50,000, but only with the approval of the recipient’s Federal cognizant agency for indirect costs. To determine an applicant’s cognizant agency for indirect costs, consult the definition of “cognizant agency for indirect costs” in 2 CFR § 200.1.

If the recipient uses a micro-purchase threshold that is higher than the Federal micro-purchase threshold, the recipient certifies:

- (a) The recipient’s micro-purchase threshold does not exceed \$50,000, or the recipient has approval from its Federal cognizant agency for indirect costs to use a higher micro-purchase threshold;
- (b) The recipient has a written justification for its micro-purchase threshold; and
- (c) The recipient has supporting documentation of any of the following:
 - (1) The recipient qualifies as a low-risk auditee, in accordance with the criteria in 2 CFR § 200.520 for the most recent audit;
 - (2) The recipient has an annual internal institutional risk assessment to identify, mitigate, and manage financial risks; or
 - (3) For public institutions, a higher threshold is consistent with State law.

1.5. Suspension and Debarment.

Pursuant to Executive Order 12549, as implemented at 2 CFR Parts 180 and 1200, prior to entering into a covered transaction with an applicant, FTA must determine whether the applicant is excluded from participating in covered non-procurement transactions. For this purpose, FTA is authorized to collect a certification from each applicant regarding the applicant's exclusion status. 2 CFR § 180.300. Additionally, each applicant must disclose any information required by 2 CFR § 180.335 about the applicant and the applicant's principals prior to entering into an award agreement with FTA. This certification serves both purposes.

The applicant certifies, to the best of its knowledge and belief, that the applicant and each of its principals:

- (a) Is not presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily or involuntarily excluded from covered transactions by any Federal department or agency;
- (b) Has not, within the preceding three years, been convicted of or had a civil judgment rendered against him or her for commission of fraud or a criminal offense in connection with obtaining, attempting to obtain, or performing a public or private agreement or transaction; violation of Federal or State antitrust statutes, including those proscribing price fixing between competitors, allocation of customers between competitors, and bid rigging; commission of embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements, tax evasion, receiving stolen property, making false claims, or obstruction of justice; or commission of any other offense indicating a lack of business integrity or business honesty;
- (c) Is not presently indicted for or otherwise criminally or civilly charged by a governmental entity (Federal, State, or local) with commission of any offense described in paragraph (b) of this certification; and
- (d) Has not, within the preceding three years, had one or more public transactions (Federal, State, or local) terminated for cause or default.

1.6. Lobbying.

If the applicant will apply for a grant or cooperative agreement exceeding \$100,000, or a loan, line of credit, loan guarantee, or loan insurance exceeding \$150,000, it must make the following certification and, if applicable, make a disclosure regarding the applicant's lobbying activities. This certification is required by 49 CFR § 20.110 and app. A to that part.

This certification does not apply to an applicant that is an Indian Tribe, Indian organization, or an Indian tribal organization exempt from the requirements of 49 CFR Part 20.

1.6.1. Certification for Contracts, Grants, Loans, and Cooperative Agreements.

The undersigned certifies, to the best of his or her knowledge and belief, that:

- (a) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.
- (b) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions.
- (c) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

1.6.2. Statement for Loan Guarantees and Loan Insurance.

The undersigned states, to the best of his or her knowledge and belief, that:

If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions.

Submission of this statement is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required statement

shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

1.7. Real Property Use

This certification responds to Recommendation #7 in the U.S. Department of Transportation's Office of Inspector General Report FS2024025 (May 20, 2024).

If the applicant will use assistance provided by the Federal Transit Administration to acquire or improve real property, the applicant certifies that it will comply with the requirements of 2 CFR § 200.311, including but not limited to, requirements to use the property for the purposes authorized in its award, and to seek disposition instructions from FTA when the property no longer is needed for any authorized purpose.

CATEGORY 2. PUBLIC TRANSPORTATION AGENCY SAFETY PLANS

This certification is required of each applicant under the Urbanized Area Formula Grants Program (49 U.S.C. § 5307), each rail operator that is subject to FTA's state safety oversight programs, and each State that is required to draft and certify a Public Transportation Agency Safety Plan on behalf of a Small Public Transportation Provider (as that term is defined at 49 CFR § 673.5) pursuant to 49 CFR § 673.11(d).

This certification is required by 49 U.S.C. § 5307(c)(1)(L), 49 U.S.C. § 5329(d)(1), and 49 CFR § 673.13. This certification is a condition of receipt of Urbanized Area Formula Grants Program (49 U.S.C. § 5307) funding.

This certification does not apply to any applicant that only receives financial assistance from FTA under the Formula Grants for the Enhanced Mobility of Seniors Program (49 U.S.C. § 5310), the Formula Grants for Rural Areas Program (49 U.S.C. § 5311), or combination of these two programs, unless it operates a rail fixed guideway public transportation system.

If the applicant is an operator, the applicant certifies that it has established a Public Transportation Agency Safety Plan meeting the requirements of 49 U.S.C. § 5329(d)(1) and 49 CFR Part 673; including, specifically, that the board of directors (or equivalent entity) of the applicant has approved, or, in the case of an applicant that will apply for assistance under 49 U.S.C. § 5307 that is serving an urbanized area with a population of 200,000 or more, the safety committee of the entity established under 49 U.S.C. § 5329(d)(5), followed by the board of directors (or equivalent entity) of the applicant has approved, the Public Transportation Agency Safety Plan or any updates thereto; and, for each recipient serving an urbanized area with a population of fewer than 200,000, that the Public Transportation Agency Safety Plan has been developed in cooperation with frontline employee representatives.

If the applicant is a State that drafts and certifies a Public Transportation Agency Safety Plan on behalf of a public transportation operator, the applicant certifies that:

- (a) It has drafted and certified a Public Transportation Agency Safety Plan meeting the requirements of 49 U.S.C. § 5329(d)(1) and 49 CFR Part 673 for each Small Public Transportation Provider (as that term is defined at 49 CFR § 673.5) in the State, unless the Small Public Transportation Provider provided notification to the State that it was opting out of the State-drafted plan and drafting its own Public Transportation Agency Safety Plan; and
- (b) Each Small Public Transportation Provider within the State that opts to use a State-drafted Public Transportation Agency Safety Plan has a plan that has been approved by the provider's Accountable Executive (as that term is defined at 49 CFR § 673.5), Board of Directors or Equivalent Authority (as that term is defined at 49 CFR § 673.5), and, if the Small Public Transportation Provider serves an urbanized area with a population of 200,000 or more, the safety committee of the Small Public Transportation Provider established under 49 U.S.C. § 5329(d)(5).

CATEGORY 3. TAX LIABILITY AND FELONY CONVICTIONS.

If the applicant is a business association (regardless of for-profit, not for-profit, or tax-exempt status), it must make this certification. Federal appropriations acts since at least 2014 have prohibited FTA from using funds to enter into an agreement with any corporation that has unpaid Federal tax liabilities or recent felony convictions without first considering the corporation for debarment. E.g., Further Consolidated Appropriations Act, 2024, Pub. L. 118-47, div. B, tit. VII, §§ 744-745. U.S. DOT Order 4200.6 defines a "corporation" as "any private corporation, partnership, trust, joint-stock company, sole proprietorship, or other business association", and applies the restriction to all tiers of subawards. As prescribed by U.S. DOT Order 4200.6, FTA requires each business association applicant to certify as to its tax and felony status.

If the applicant is a private corporation, partnership, trust, joint-stock company, sole proprietorship, or other business association, the applicant certifies that:

- (a) It has no unpaid Federal tax liability that has been assessed, for which all judicial and administrative remedies have been exhausted or have lapsed, and that is not being paid in a timely manner pursuant to an agreement with the authority responsible for collecting the tax liability; and
- (b) It has not been convicted of a felony criminal violation under any Federal law within the preceding 24 months.

CATEGORY 4. PRIVATE SECTOR PROTECTIONS.

If the applicant will apply for funds that it will use to acquire or operate public transportation facilities or equipment, the applicant must make the following certification regarding protections for the private sector.

4.1. Charter Service Agreement.

To enforce the provisions of 49 U.S.C. § 5323(d), FTA's charter service regulation requires each applicant seeking assistance from FTA for the purpose of acquiring or operating any public transportation equipment or facilities to make the following Charter Service Agreement. 49 CFR § 604.4.

The applicant agrees that it, and each of its subrecipients, and thirdparty contractors at any level who use FTA-funded vehicles, may provide charter service using equipment or facilities acquired with Federal assistance authorized under the Federal Transit Laws only in compliance with the regulations set out in 49 CFR Part 604, the terms and conditions of which are incorporated herein by reference.

4.2. School Bus Agreement.

To enforce the provisions of 49 U.S.C. § 5323(f), FTA's school bus regulation requires each applicant seeking assistance from FTA for the purpose of acquiring or operating any public transportation equipment or facilities to make the following agreement regarding the provision of school bus services. 49 CFR § 605.15.

- (a) If the applicant is not authorized by the FTA Administrator under 49 CFR § 605.11 to engage in school bus operations, the applicant agrees and certifies as follows:
 - (1) The applicant and any operator of project equipment agrees that it will not engage in school bus operations in competition with private school bus operators.
 - (2) The applicant agrees that it will not engage in any practice which constitutes a means of avoiding the requirements of this agreement, part 605 of the Federal Mass Transit Regulations, or section 164(b) of the Federal-Aid Highway Act of 1973 (49 U.S.C. 1602a(b)).
- (b) If the applicant is authorized or obtains authorization from the FTA Administrator to engage in school bus operations under 49 CFR § 605.11, the applicant agrees as follows:
 - (1) The applicant agrees that neither it nor any operator of project equipment will engage in school bus operations in competition with private school bus operators except as provided herein.
 - (2) The applicant, or any operator of project equipment, agrees to promptly notify the FTA Administrator of any changes in its operations which might jeopardize the continuation of an exemption under § 605.11.

- (3) The applicant agrees that it will not engage in any practice which constitutes a means of avoiding the requirements of this agreement, part 605 of the Federal Transit Administration regulations or section 164(b) of the Federal-Aid Highway Act of 1973 (49 U.S.C. 1602a(b)).
- (4) The applicant agrees that the project facilities and equipment shall be used for the provision of mass transportation services within its urban area and that any other use of project facilities and equipment will be incidental to and shall not interfere with the use of such facilities and equipment in mass transportation service to the public.

CATEGORY 5. TRANSIT ASSET MANAGEMENT PLAN.

If the applicant owns, operates, or manages capital assets used to provide public transportation, the following certification is required by 49 U.S.C. § 5326(a).

The applicant certifies that it is in compliance with 49 CFR Part 625.

CATEGORY 6. ROLLING STOCK BUY AMERICA REVIEWS AND BUS TESTING.

6.1. Rolling Stock Buy America Reviews.

If the applicant will apply for an award to acquire rolling stock for use in revenue service, it must make this certification. This certification is required by 49 CFR § 663.7.

The applicant certifies that it will conduct or cause to be conducted the pre-award and post-delivery audits prescribed by 49 CFR Part 663 and will maintain on file the certifications required by Subparts B, C, and D of 49 CFR Part 663.

6.2. Bus Testing.

If the applicant will apply for funds for the purchase or lease of any new bus model, or any bus model with a major change in configuration or components, the applicant must make this certification. This certification is required by 49 CFR § 665.7.

The applicant certifies that the bus was tested at the Bus Testing Facility established in accordance with 49 U.S.C. § 5318 (currently the Larson Transportation Institute's Bus Research and Testing Center at Pennsylvania State University) and that the bus received a passing test score as required by 49 CFR Part 665. The applicant has received or will receive the appropriate full Bus Testing Report and any applicable partial testing reports before final acceptance of the first vehicle.

CATEGORY 7. URBANIZED AREA FORMULA GRANTS PROGRAM.

If the applicant will apply for an award under the Urbanized Area Formula Grants Program (49 U.S.C. § 5307), or any other program or award that is subject to the requirements of 49 U.S.C. § 5307, including the Formula Grants for the Enhanced Mobility of Seniors Program (49 U.S.C. § 5310); “flex funds” from infrastructure programs administered by the Federal Highways Administration (see 49 U.S.C. § 5334(i)); projects that will receive an award authorized by the Transportation Infrastructure Finance and Innovation Act (“TIFIA”) (23 U.S.C. §§ 601–609) or State Infrastructure Bank Program (23 U.S.C. § 610) (see 49 U.S.C. § 5323(o)); formula awards or competitive awards to urbanized areas under the Grants for Buses and Bus Facilities Program (49 U.S.C. § 5339(a) and (b)); or low or no emission awards to any area under the Grants for Buses and Bus Facilities Program (49 U.S.C. § 5339(c)), the applicant must make the following certification. This certification is required by 49 U.S.C. § 5307(c)(1).

The applicant certifies that it:

- (a) Has or will have the legal, financial, and technical capacity to carry out the program of projects (developed pursuant 49 U.S.C. § 5307(b)), including safety and security aspects of the program;
- (b) Has or will have satisfactory continuing control over the use of equipment and facilities;
- (c) Will maintain equipment and facilities in accordance with the applicant’s transit asset management plan;
- (d) Will ensure that, during non-peak hours for transportation using or involving a facility or equipment of a project financed under this section, a fare that is not more than 50 percent of the peak hour fare will be charged for any—
 - (1) Senior;
 - (2) Individual who, because of illness, injury, age, congenital malfunction, or any other incapacity or temporary or permanent disability (including an individual who is a wheelchair user or has semi-ambulatory capability), cannot use a public transportation service or a public transportation facility effectively without special facilities, planning, or design; and
 - (3) Individual presenting a Medicare card issued to that individual under title II or XVIII of the Social Security Act (42 U.S.C. §§ 401 et seq., and 1395 et seq.);
- (e) In carrying out a procurement under 49 U.S.C. § 5307, will comply with 49 U.S.C. §§ 5323 (general provisions) and 5325 (contract requirements);
- (f) Has complied with 49 U.S.C. § 5307(b) (program of projects requirements);
- (g) Has available and will provide the required amounts as provided by 49 U.S.C. § 5307(d) (cost sharing);
- (h) Will comply with 49 U.S.C. §§ 5303 (metropolitan transportation planning) and 5304 (statewide and nonmetropolitan transportation planning);

- (i) Has a locally developed process to solicit and consider public comment before raising a fare or carrying out a major reduction of transportation;
- (j) Either—
 - (1) Will expend for each fiscal year for public transportation security projects, including increased lighting in or adjacent to a public transportation system (including bus stops, subway stations, parking lots, and garages), increased camera surveillance of an area in or adjacent to that system, providing an emergency telephone line to contact law enforcement or security personnel in an area in or adjacent to that system, and any other project intended to increase the security and safety of an existing or planned public transportation system, at least 1 percent of the amount the recipient receives for each fiscal year under 49 U.S.C. § 5336; or
 - (2) Has decided that the expenditure for security projects is not necessary;
- (k) In the case of an applicant for an urbanized area with a population of not fewer than 200,000 individuals, as determined by the Bureau of the Census, will submit an annual report listing projects carried out in the preceding fiscal year under 49 U.S.C. § 5307 for associated transit improvements as defined in 49 U.S.C. § 5302; and
- (l) Will comply with 49 U.S.C. § 5329(d) (public transportation agency safety plan).

CATEGORY 8. FORMULA GRANTS FOR RURAL AREAS.

If the applicant will apply for funds made available to it under the Formula Grants for Rural Areas Program (49 U.S.C. § 5311), it must make this certification. Paragraph (a) of this certification helps FTA make the determinations required by 49 U.S.C. § 5311(b)(2)(C). Paragraph (b) of this certification is required by 49 U.S.C. § 5311(f)(2). Paragraph (c) of this certification, which applies to funds apportioned for the Appalachian Development Public Transportation Assistance Program, is necessary to enforce the conditions of 49 U.S.C. § 5311(c)(2)(D).

- (a) The applicant certifies that its State program for public transportation service projects, including agreements with private providers for public transportation service—
 - (1) Provides a fair distribution of amounts in the State, including Indian reservations; and
 - (2) Provides the maximum feasible coordination of public transportation service assisted under 49 U.S.C. § 5311 with transportation service assisted by other Federal sources; and
- (b) If the applicant will in any fiscal year expend less than 15% of the total amount made available to it under 49 U.S.C. § 5311 to carry out a program to develop and support intercity bus transportation, the applicant certifies that it has consulted with affected

intercity bus service providers, and the intercity bus service needs of the State are being met adequately.

- (c) If the applicant will use for a highway project amounts that cannot be used for operating expenses authorized under 49 U.S.C. § 5311(c)(2) (Appalachian Development Public Transportation Assistance Program), the applicant certifies that—
 - (1) It has approved the use in writing only after providing appropriate notice and an opportunity for comment and appeal to affected public transportation providers; and
 - (2) It has determined that otherwise eligible local transit needs are being addressed.

CATEGORY 9. FIXED GUIDEWAY CAPITAL INVESTMENT GRANTS AND THE EXPEDITED PROJECT DELIVERY FOR CAPITAL INVESTMENT GRANTS PILOT PROGRAM.

If the applicant will apply for an award under any subsection of the Fixed Guideway Capital Investment Program (49 U.S.C. § 5309), including an award made pursuant to the FAST Act’s Expedited Project Delivery for Capital Investment Grants Pilot Program (Pub. L. 114-94, div. A, title III, § 3005(b)), the applicant must make the following certification. This certification is required by 49 U.S.C. § 5309(c)(2) and Pub. L. 114-94, div. A, title III, § 3005(b)(3)(B).

The applicant certifies that it:

- (a) Has or will have the legal, financial, and technical capacity to carry out its Award, including the safety and security aspects of that Award,
- (b) Has or will have satisfactory continuing control over the use of equipment and facilities acquired or improved under its Award.
- (c) Will maintain equipment and facilities acquired or improved under its Award in accordance with its transit asset management plan; and
- (d) Will comply with 49 U.S.C. §§ 5303 (metropolitan transportation planning) and 5304 (statewide and nonmetropolitan transportation planning).

CATEGORY 10. GRANTS FOR BUSES AND BUS FACILITIES AND LOW OR NO EMISSION VEHICLE DEPLOYMENT GRANT PROGRAMS.

If the applicant is in an urbanized area and will apply for an award under subsection (a) (formula grants), subsection (b) (buses and bus facilities competitive grants), or subsection (c) (low or no emissions grants) of the Grants for Buses and Bus Facilities Program (49 U.S.C. § 5339), the applicant must make the certification in Category 7 for Urbanized Area Formula Grants (49 U.S.C. § 5307). This certification is required by 49 U.S.C. § 5339(a)(3), (b)(6), and (c)(3), respectively.

If the applicant is in a rural area and will apply for an award under subsection (a) (formula grants), subsection (b) (bus and bus facilities competitive grants), or subsection (c) (low or no emissions grants) of the Grants for Buses and Bus Facilities Program (49 U.S.C. § 5339), the applicant must make the certification in Category 8 for Formula Grants for Rural Areas (49 U.S.C. § 5311). This certification is required by 49 U.S.C. § 5339(a)(3), (b)(6), and (c)(3), respectively.

Making this certification will incorporate by reference the applicable certifications in Category 7 or Category 8.

If the applicant will receive a competitive award under subsection (b) (buses and bus facilities competitive grants), or subsection (c) (low or no emissions grants) of the Grants for Buses and Bus Facilities Program (49 U.S.C. § 5339) related to zero emissions vehicles or related infrastructure, it must make the following certification. This certification is required by 49 U.S.C. § 5339(d).

The applicant will use 5 percent of grants related to zero emissions vehicles (as defined in 49 U.S.C. § 5339(c)(1)) or related infrastructure under 49 U.S.C. § 5339(b) or (c) to fund workforce development training as described in section 49 U.S.C. § 5314(b)(2) (including registered apprenticeships and other labor-management training programs) under the recipient's plan to address the impact of the transition to zero emission vehicles on the applicant's current workforce; or the applicant certifies a smaller percentage is necessary to carry out that plan.

CATEGORY 11. ENHANCED MOBILITY OF SENIORS AND INDIVIDUALS WITH DISABILITIES PROGRAMS.

If the applicant will apply for an award under the Formula Grants for the Enhanced Mobility of Seniors and Individuals with Disabilities Program (49 U.S.C. § 5310), it must make the certification in Category 7 for Urbanized Area Formula Grants (49 U.S.C. § 5307). This certification is required by 49 U.S.C. § 5310(e)(1). Making this certification will incorporate by reference the certification in Category 7, except that FTA has determined that (d), (f), (i), (j), and (k) of Category 7 do not apply to awards made under 49 U.S.C. § 5310 and will not be enforced.

In addition to the certification in Category 7, the applicant must make the following certification that is specific to the Formula Grants for the Enhanced Mobility of Seniors and Individuals with Disabilities Program. This certification is required by 49 U.S.C. § 5310(e)(2).

The applicant certifies that:

- (a) The projects selected by the applicant are included in a locally developed, coordinated public transit-human services transportation plan;

- (b) The plan described in clause (a) was developed and approved through a process that included participation by seniors, individuals with disabilities, representatives of public, private, and nonprofit transportation and human services providers, and other members of the public;
- (c) To the maximum extent feasible, the services funded under 49 U.S.C. § 5310 will be coordinated with transportation services assisted by other Federal departments and agencies, including any transportation activities carried out by a recipient of a grant from the Department of Health and Human Services; and
- (d) If the applicant will allocate funds received under 49 U.S.C. § 5310 to subrecipients, it will do so on a fair and equitable basis.

CATEGORY 12. STATE OF GOOD REPAIR GRANTS.

If the applicant will apply for an award under FTA's State of Good Repair Grants Program (49 U.S.C. § 5337), it must make the following certification. Because FTA generally does not review the transit asset management plans of public transportation providers, the asset management certification is necessary to enforce the provisions of 49 U.S.C. § 5337(a)(4). The certification with regard to acquiring restricted rail rolling stock is required by 49 U.S.C. § 5323(u)(4). Note that this certification is not limited to the use of Federal funds.

The applicant certifies that the projects it will carry out using assistance authorized by the State of Good Repair Grants Program, 49 U.S.C. § 5337, are aligned with the applicant's most recent transit asset management plan and are identified in the investment and prioritization section of such plan, consistent with the requirements of 49 CFR Part 625.

If the applicant operates a rail fixed guideway service, the applicant certifies that, in the fiscal year for which an award is available to the applicant under the State of Good Repair Grants Program, 49 U.S.C. § 5337, the applicant will not award any contract or subcontract for the procurement of rail rolling stock for use in public transportation with a rail rolling stock manufacturer described in 49 U.S.C. § 5323(u)(1).

CATEGORY 13. INFRASTRUCTURE FINANCE PROGRAMS.

If the applicant will apply for an award for a project that will include assistance under the Transportation Infrastructure Finance and Innovation Act ("TIFIA") Program (23 U.S.C. §§ 601–609) or the State Infrastructure Banks ("SIB") Program (23 U.S.C. § 610), it must make the certifications in Category 7 for the Urbanized Area Formula Grants Program, Category 9 for the Fixed Guideway Capital Investment Grants program, and Category 12 for the State of Good Repair Grants program. These certifications are required by 49 U.S.C. § 5323(o).

Making this certification will incorporate the certifications in Categories 7, 9, and 12 by reference.

CATEGORY 14. ALCOHOL AND CONTROLLED SUBSTANCES TESTING.

If the applicant will apply for an award under FTA's Urbanized Area Formula Grants Program (49 U.S.C. § 5307), Fixed Guideway Capital Investment Program (49 U.S.C. § 5309), Formula Grants for Rural Areas Program (49 U.S.C. § 5311), or Grants for Buses and Bus Facilities Program (49 U.S.C. § 5339) programs, the applicant must make the following certification. The applicant must make this certification on its own behalf and on behalf of its subrecipients and contractors. This certification is required by 49 CFR § 655.83.

The applicant certifies that it, its subrecipients, and its contractors are compliant with FTA's regulation for the Prevention of Alcohol Misuse and Prohibited Drug Use in Transit Operations, 49 CFR Part 655.

CATEGORY 15. RAIL SAFETY TRAINING AND OVERSIGHT.

If the applicant is a State with at least one rail fixed guideway system, or is a State Safety Oversight Agency, or operates a rail fixed guideway system, it must make the following certification. The elements of this certification are required by 49 CFR §§ 672.31 and 674.39.

The applicant certifies that the rail fixed guideway public transportation system and the State Safety Oversight Agency for the State are:

- (a) Compliant with the requirements of 49 CFR Part 672, "Public Transportation Safety Certification Training Program"; and
- (b) Compliant with the requirements of 49 CFR Part 674, "State Safety Oversight".

CATEGORY 16. DEMAND RESPONSIVE SERVICE.

If the applicant operates demand responsive service and will apply for an award to purchase a non-rail vehicle that is not accessible within the meaning of 49 CFR Part 37, it must make the following certification. This certification is required by 49 CFR § 37.77.

The applicant certifies that the service it provides to individuals with disabilities is equivalent to that provided to other persons. A demand responsive system, when viewed in its entirety, is deemed to provide equivalent service if the service available to individuals with disabilities, including individuals who use wheelchairs, is provided in the most integrated setting appropriate to the needs of the individual and is equivalent to the service provided other individuals with respect to the following service characteristics:

- (a) Response time;
- (b) Fares;
- (c) Geographic area of service;
- (d) Hours and days of service;

- (e) Restrictions or priorities based on trip purpose;
- (f) Availability of information and reservation capability; and
- (g) Any constraints on capacity or service availability.

CATEGORY 17. INTEREST AND FINANCING COSTS.

If the applicant will pay for interest or other financing costs of a project using assistance awarded under the Urbanized Area Formula Grants Program (49 U.S.C. § 5307), the Fixed Guideway Capital Investment Grants Program (49 U.S.C. § 5309), or any program that must comply with the requirements of 49 U.S.C. § 5307, including the Formula Grants for the Enhanced Mobility of Seniors Program (49 U.S.C. § 5310), “flex funds” from infrastructure programs administered by the Federal Highways Administration (see 49 U.S.C. § 5334(i)), or awards to urbanized areas under the Grants for Buses and Bus Facilities Program (49 U.S.C. § 5339), the applicant must make the following certification. This certification is required by 49 U.S.C. §§ 5307(e)(3) and 5309(k)(2)(D).

The applicant certifies that:

- (a) Its application includes the cost of interest earned and payable on bonds issued by the applicant only to the extent proceeds of the bonds were or will be expended in carrying out the project identified in its application; and
- (b) The applicant has shown or will show reasonable diligence in seeking the most favorable financing terms available to the project at the time of borrowing.

CATEGORY 18. CYBERSECURITY CERTIFICATION FOR RAIL ROLLING STOCK AND OPERATIONS.

If the applicant operates a rail fixed guideway public transportation system, it must make this certification. This certification is required by 49 U.S.C. § 5323(v). For information about standards or practices that may apply to a rail fixed guideway public transportation system, visit <https://www.nist.gov/cyberframework> and <https://www.cisa.gov/>.

The applicant certifies that it has established a process to develop, maintain, and execute a written plan for identifying and reducing cybersecurity risks that complies with the requirements of 49 U.S.C. § 5323(v)(2).

CATEGORY 19. PUBLIC TRANSPORTATION ON INDIAN RESERVATIONS FORMULA AND DISCRETIONARY PROGRAM (TRIBAL TRANSIT PROGRAMS).

Before FTA may provide Federal assistance for an Award financed under either the Public Transportation on Indian Reservations Formula or Discretionary Program authorized under 49 U.S.C. § 5311(c)(1), as amended by the FAST Act, (Tribal Transit Programs), the applicant

must select the Certifications in this Category, except as FTA determines otherwise in writing. Tribal Transit Program applicants may certify to this Category and Category 1 (Certifications and Assurances Required of Every Applicant) and need not make any other certification, to meet Tribal Transit Program certification requirements. If an applicant will apply for any program in addition to the Tribal Transit Program, additional certifications may be required.

FTA has established terms and conditions for Tribal Transit Program grants financed with Federal assistance appropriated or made available under 49 U.S.C. § 5311(c)(1). The applicant certifies that:

- (a) It has or will have the legal, financial, and technical capacity to carry out its Award, including the safety and security aspects of that Award.
- (b) It has or will have satisfactory continuing control over the use of its equipment and facilities acquired or improved under its Award.
- (c) It will maintain its equipment and facilities acquired or improved under its Award, in accordance with its transit asset management plan and consistent with FTA regulations, “Transit Asset Management,” 49 CFR Part 625. Its Award will achieve maximum feasible coordination with transportation service financed by other federal sources.
- (d) With respect to its procurement system:
 - (1) It will have a procurement system that complies with U.S. DOT regulations, “Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards,” 2 CFR Part 1201, which incorporates by reference U.S. OMB regulatory guidance, “Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards,” 2 CFR Part 200, for Awards made on or after December 26, 2014,
 - (2) It will have a procurement system that complies with U.S. DOT regulations, “Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments,” 49 CFR Part 18, specifically former 49 CFR § 18.36, for Awards made before December 26, 2014, or
 - (3) It will inform FTA promptly if its procurement system does not comply with either of those U.S. DOT regulations.
- (e) It will comply with the Certifications, Assurances, and Agreements in:
 - (1) Category 4.1 and 4.2 (Charter Service Agreement and School Bus Agreement),
 - (2) Category 5 (Transit Asset Management Plan),
 - (3) Category 6.1 and 6.2 (Rolling Stock Buy America Reviews and Bus Testing),
 - (4) Category 8 (Formula Grants for Rural Areas),
 - (5) Category 14 (Alcohol and Controlled Substances Testing), and
 - (6) Category 16 (Demand Responsive Service).

CATEGORY 20. EMERGENCY RELIEF PROGRAM.

An applicant to the Public Transportation Emergency Relief Program, 49 U.S.C. § 5324, must make the following certification. The certification is required by 49 U.S.C. § 5324(f) and must be made before the applicant can receive a grant under the Emergency Relief program.

The applicant certifies that the applicant has insurance required under State law for all structures related to the emergency relief program grant application.

FEDERAL FISCAL YEAR 2025 CERTIFICATIONS AND ASSURANCES FOR FTA ASSISTANCE PROGRAMS

(Signature pages alternate to providing Certifications and Assurances in TrAMS.)

Name of Applicant: Lowell Regional Transit Authority

The Applicant certifies to the applicable provisions of all categories: (*check here*) _____.

Or,

The Applicant certifies to the applicable provisions of the categories it has selected:

Category	Certification
01 Certifications and Assurances Required of Every Applicant	<input checked="" type="checkbox"/>
02 Public Transportation Agency Safety Plans	<input checked="" type="checkbox"/>
03 Tax Liability and Felony Convictions	<input type="checkbox"/>
04 Private Sector Protections	<input type="checkbox"/>
05 Transit Asset Management Plan	<input checked="" type="checkbox"/>
06 Rolling Stock Buy America Reviews and Bus Testing	<input checked="" type="checkbox"/>
07 Urbanized Area Formula Grants Program	<input checked="" type="checkbox"/>
08 Formula Grants for Rural Areas	<input checked="" type="checkbox"/>
09 Fixed Guideway Capital Investment Grants and the Expedited Project Delivery for Capital Investment Grants Pilot Program	<input type="checkbox"/>
10 Grants for Buses and Bus Facilities and Low or No Emission Vehicle Deployment Grant Programs	<input checked="" type="checkbox"/>
11 Enhanced Mobility of Seniors and Individuals with Disabilities Programs	<input checked="" type="checkbox"/>

12	State of Good Repair Grants	<input checked="" type="checkbox"/>
13	Infrastructure Finance Programs	<input type="checkbox"/>
14	Alcohol and Controlled Substances Testing	<input checked="" type="checkbox"/>
15	Rail Safety Training and Oversight	<input type="checkbox"/>
16	Demand Responsive Service	<input checked="" type="checkbox"/>
17	Interest and Financing Costs	<input type="checkbox"/>
18	Cybersecurity Certification for Rail Rolling Stock and Operations	<input type="checkbox"/>
19	Tribal Transit Programs	<input type="checkbox"/>
20	Emergency Relief Program	

CERTIFICATIONS AND ASSURANCES SIGNATURE PAGE

AFFIRMATION OF APPLICANT

Name of the Applicant: Lowell Regional Transit Authority

BY SIGNING BELOW, on behalf of the Applicant, I declare that it has duly authorized me to make these Certifications and Assurances and bind its compliance. Thus, it agrees to comply with all federal laws, regulations, and requirements, follow applicable federal guidance, and comply with the Certifications and Assurances as indicated on the foregoing page applicable to each application its Authorized Representative makes to the Federal Transit Administration (FTA) in the federal fiscal year, irrespective of whether the individual that acted on his or her Applicant’s behalf continues to represent it.

The Certifications and Assurances the Applicant selects apply to each Award for which it now seeks, or may seek in the future, of federal assistance to be awarded by FTA during the federal fiscal year.

The Applicant affirms the truthfulness and accuracy of the Certifications and Assurances it has selected in the statements submitted with this document and any other submission made to FTA, and acknowledges that the Program Fraud Civil Remedies Act of 1986, 31 U.S.C. § 3801 *et seq.*, and implementing U.S. DOT regulations, “Program Fraud Civil Remedies,” 49 CFR part 31, apply to any certification, assurance or submission made to FTA. The criminal provisions of 18 U.S.C. § 1001 apply to any certification, assurance, or submission made in connection with a federal public transportation program authorized by 49 U.S.C. chapter 53 or any other statute

In signing this document, I declare under penalties of perjury that the foregoing Certifications and Assurances, and any other statements made by me on behalf of the Applicant are true and accurate.

Signature David Bradley David Bradley (Jun 9, 2025 13:40 EDT) Date: 06/09/25

Name David Bradley Authorized Representative of Applicant

AFFIRMATION OF APPLICANT’S ATTORNEY

For (Name of Applicant): Lowell Regional Transit Authority

As the undersigned Attorney for the above-named Applicant, I hereby affirm the Applicant has the authority under state, local, or tribal government law, as applicable, to make and comply with the Certifications and Assurances as indicated on the foregoing pages. I further affirm that, in my opinion, the Certifications and Assurances have been legally made and constitute legal and binding obligations on it.

I further affirm that, to the best of my knowledge, there is no legislation or litigation pending or imminent that might adversely affect the validity of these Certifications and Assurances, or of the performance of its FTA assisted Award.

Signature Mark Reich Date: 06/10/25
Mark Reich (Jun 10, 2025 12:39 EDT)

Name Mark Reich Attorney for Applicant

Each Applicant for federal assistance to be awarded by FTA must provide an Affirmation of Applicant’s Attorney pertaining to the Applicant’s legal capacity. The Applicant may enter its electronic signature in lieu of the Attorney’s signature within TrAMS, provided the Applicant has on file and uploaded to TrAMS this hard-copy Affirmation, signed by the attorney and dated this federal fiscal year.

Appendix 5: PTASP Transmittal

2025 PTASP

From Ali Bent <a.bent@lrta.com>

Date Fri 9/26/2025 8:13 AM

To Trisha Gasper <p.gasper@lrta.com>; George Anastas <g.anastas@lrta.com>; Dawn Marvin <d.marvin@lrta.com>; Tim Bomil <t.bomil@lrta.com>; Michelle LeBel <M.LeBel@lrta.com>; John Bronski <j.bronski@lrta.com>; Dave Bradley <d.bradley@lrta.com>; Kevin Drislane <k.drislane@lrta.com>; Meaghan O'Brien <m.obrien@lrta.com>; Justin Howard <Justin.Howard@lrta.com>; Chris Curry <c.curry@lrta.com>; toddbello@hotmail.com <toddbello@hotmail.com>

Hi all,

Please see the updated Safety Plan, signed by the Accountable Executive and approved by the Safety Committee and LRTA Advisory Board.

Please distribute to ALL employees.

Let me know if you have any questions and thank you for all your help on the update!

 [250926_Final PTASP Sept 2025.pdf](#)

Ali Bent

Assistant Administrator
Lowell Regional Transit Authority
115 Thorndike Street
Lowell, MA 01852
(978) 459-0164 x107