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September 15, 2023

The Honorable Jarrett Coleman, Chairman
Intergovernmental Operations Committee
Senate of Pennsylvania
Senate Box 203016
Room: 459 Main Capitol
Harrisburg, PA 17120-2179

Dear Chairman Coleman and Members of the Intergovernmental Operations Committee:

On behalf of SEPTA, the Commonwealth's largest public transportation agency carrying more than 600,000 trips across southeastern Pennsylvania each day, I write to express SEPTA's considerable concerns about HB 299 and the potential that overlapping or conflicting regulatory requirements could impact SEPTA's safety compliance and reporting program.

The safety of our riders, employees and the public is of paramount importance to SEPTA. Never in the public transit industry's history has there been such emphasis placed on public and employee safety from a regulatory standpoint as there is today, including new requirements in the Infrastructure Investment and Jobs Act, which bolster frontline worker participation in the development of agency safety plans.


A rigorous industry-specific system safety program regulates SEPTA's multimodal transit system of commuter rail, heavy rail, light rail, buses and paratransit. SEPTA is required to comply with over 60 separate federal and state safety, health, and environmental regulations enforced by the Federal Transit Administration, Federal Railroad Administration, PennDOT, including its role as the federally mandated fixed-guideway State Safety Oversight Agency, the Pennsylvania Department of Labor, United States Environmental Protection Agency, and the Pennsylvania Department of Environmental Protection, among others. Like the Occupational Safety and Health Act, the safety protocols and practices that are required of SEPTA by these federal and state regulators include planning, statistical reporting, auditing, and a heavy focus on employee safety.

While SEPTA has always had a strong safety program, the current regime of complementary and supplementary regulations from the federal and state governments solidifies the attention to workplace safety and provides many ways to

hold transit agencies accountable to conform to all of these requirements. It is our belief that HB 299 creates an unnecessary layer to existing comprehensive safety regulations and has the potential to conflict with current safety management protocols and place an undue strain on the agency's limited resources.

Thank you for the opportunity to comment on HB 299, and please let me know if you have any questions.

Sincerely,



Scott Sauer, CSP, WSO-CSSD
Chief Operating Officer