



Metropolitan Transportation Authority

State of New York

April 2, 2024

VIA ELECTRONIC MAIL

Mr. Janno Lieber
Chair and Chief Executive Officer
Metropolitan Transportation Authority
2 Broadway, 20th Floor
New York, New York 10004

**Re: 180 Day Response to the Office of the New York State Comptroller
Audit Report 2021-S-27 – MTA/NYCT Risk Assessment and
Implementation of Measures to Address Extreme Weather Conditions**

Dear Chair Lieber:

In accordance with the requirements of Executive Law Section 170, what follows is a status update of the actions taken by MTA Construction & Development Company (“MTA C&D”) and the New York City Transit Authority (“NYCT”, and, collectively with MTA C&D, the “MTA Agencies”), in response to the Office of the New York State Comptroller’s (the “OSC”) recommendations regarding risk assessment and implementation of measures to address extreme weather conditions, as set forth in Audit Report 2021-S-27 (the “Report”).

As an initial matter, we remind you that, over the past two decades, MTA has been on a steady, dedicated mission to enhance its emergency preparedness and response capabilities and to implement well-informed strategies geared at mitigating the potential damage to our assets from extreme weather events. Some of the key measures that the MTA Agencies have effectuated during that time include the creation of an updated coastal storm plan, the buildout of a situation room to manage multi-agency events, the progression of nearly \$8B in capital improvements for flood resilience, and most recently the completion of a system-wide climate vulnerability assessment.

The Report contained nine recommendations. Of those nine recommendations, MTA acknowledged eight recommendations, indicating the recommendation was already being done, and disagreed with the remaining recommendation. Below are the MTA Agencies’ updates to the recommendations contained in the Report.

Recommendation No. 1:

Evaluate the results of any future studies requested of MTA sustainability professionals and document actions taken to implement them, and where recommendations are not implemented, the reasons why.

MTA Response to Recommendation No. 1:

As noted in our initial response to the Report, the MTA had already been evaluating the results of its studies and discussing actions to implement or reject the findings. The MTA continues to do so.

Recommendation No. 2:

Ensure mitigation-related capital projects, including scope of work, are completed on time and within the budget to prevent further damage to NYCT facilities.

MTA Response to Recommendation No. 2:

As noted in our initial response to the Report, MTA C&D had already been completing the MTA's Sandy-related projects on time and on budget. MTA C&D continues to do so.

In addition, many MTA C&D construction and consultant contracts include various incentives aimed at ensuring continued delivery of our projects on time and on budget.

Recommendation No. 3:

Implement a system that links projects that were split to facilitate easy access to related documents for that project.

MTA Response to Recommendation No. 3:

As noted in our initial response to the Report, MTA C&D had already implemented this system as part of its business operations through its Project Status Report ("PSR") system. More specifically, under the PSR system, all MTA C&D capital projects are given identifiers that can be used to query an electronic report and access to documents for a particular project. These identifiers include planning numbers, contract numbers, bundle numbers, and capital project "ACEP" numbers, and can provide a single record or groups of records for a project. Additionally, certain project descriptions can be used to group records together to ensure easy access to all project documents. MTA C&D continues to utilize the PSR system for this purpose.

Recommendation No. 4:

Implement a system that links the awarded budget for the projects to the current budget and estimated completion cost on the PSRs.

MTA Response to Recommendation No. 4:

As noted in our initial response to the Report, and as discussed more generally in response to Recommendation 3 above, MTA C&D has already implemented this system as part of its business operations. Individual records contained in the PSR are made up of tasks representing major cost elements of a capital project. When a capital project is awarded, the budget of each task is adjusted to its latest estimate through established procedures, and the sum of the resulting task current budgets shown on the PSR equals the awarded budget for the project. If the total cost of a contract is split between multiple records on the PSR, the records are linked together by the contract number found on the construction task and/or the bundle number. In addition, the total

current budget from all the connected PSRs shows the total awarded budget for the contract. Similarly, each task and record on the PSR shows an estimate at completion (“EAC”) number. If a contract is split between multiple records on the PSR, the EACs can be added together to determine the total EAC of the contract.

At the end of each month, all the data saved in the PSR – including budget, EAC, milestone dates, and others – is captured and archived. The user-friendly functionality enables MTA C&D staff to easily compare the current budget to the awarded budget by simply comparing the current month’s data to the data from the month that the project was awarded. If more specificity is needed, the exact date and time the changes were made can be traced using the “Audit Trail” feature of the PSR. MTA C&D continues to utilize the PSR system in this manner.

Recommendation No. 5:

Establish clear and complete written procedures to address the maintenance and inspection process of equipment.

MTA Response to Recommendation No. 5:

As noted in our initial response to the Report, NYCT Subways already had clear written guidance on how to inspect and maintain every storm-surge mitigation asset in each asset’s operations and maintenance manuals. These manuals provide clear and complete source-driven written instruction and guidance.

In terms of documentation regarding the ownership of Subways’ storm surge mitigation assets equipment (“SSME”) assets and their required inspection/maintenance frequencies, Subways’ Emergency Preparedness (“EP”) unit has that information documented in a plan that is retained on EP’s SharePoint Site.

Recommendation No. 6:

Document sufficient information to identify the equipment being inspected such as serial number, equipment tag number, and model number.

MTA Response to Recommendation No. 6:

As noted in our original response to the Report, within MTA’s Enterprise Asset Management (“EAM”) system, all of NYCT Subways’ storm-surge mitigation assets have multiple identifiers (e.g., system code/ID, asset type, description, GIS location). These identifiers serve a purpose beyond just inventory count; they also enable field personnel to physically locate the specific assets in need of inspection. More specifically, for assets that are fixed and/or installed in place, the latitude/longitude coordinates serve as a reliable means of field identification. For assets that are either stored on- or off-site, detailed storage location information is being populated into EAM.

Recommendation No. 7:

Ensure all equipment is maintained and inspected regularly and in a timely manner.

MTA Response to Recommendation No. 7:

As noted in our original response, ensuring that NYCT Subways' storm-surge mitigation assets/equipment are inspected and maintained is already part of NYCT Subways' existing business practices. Each respective NYCT Subways' division with maintenance ownership for SSME, upon receipt of the EAM work orders, has and will continue to take ownership for ensuring this work is properly assigned and completed in a timely manner. In addition, the EAM team is currently working with NYCT Subways' divisions to develop reports based on EAM data that will provide greater insight into departmental compliance with work order completion and timeliness. This effort includes working with the respective divisions responsible for SSME assets/equipment to build reports on SSME inspection work orders. Furthermore, NYCT Subways has added an additional quality assurance measure by designating NYCT Subways' Capital Programs to serve as the central point of contact for receipt of all storm surge mitigation asset documentation.

Recommendation No. 8:

Ensure all weather reports that activate a plan are signed and dated by authorized OCC personnel.

MTA Response to Recommendation No. 8:

In our original response to the Report, NYCT Subways committed to continue to evaluate its processes related to weather report signoffs and distribution. Since then, NYCT Subways management has implemented a new protocol that ensures that any time a Subways' weather plan is activated, the most recent weather report is distributed by authorized Operations Command Center ("OCC") personnel via an email that contains the date and time of distribution and goes to all Subways "leadership" (i.e., Subways' Department Head, Executive Vice Presidents, Chief of Staff, Vice Presidents and Chief Officers, and their immediate direct reports).

Recommendation No. 9:

Establish and document a process to ensure weather information and instructions from NYCT Subways officials are communicated to all responsible NYCT Subways personnel and units.

MTA Response to Recommendation No. 9:

As noted in our original response, NYCT Subways already had in place established processes for when, how, by whom, and to whom weather forecasts and critical weather plan information (e.g., plan activations) are to be communicated. These plan-related processes have been, and will continue to be, reviewed and updated annually.

During the current review cycle, NYCT Subways implemented the following business process improvements:


- NYCT Subways created an email distribution list that encompasses “Subways leadership” (i.e., Subways’ Department Head, Executive Vice Presidents, Chief of Staff, Vice Presidents and Chief Officers, and their immediate direct reports). This distribution list is now used whenever weather plan information needs to be shared with this population (e.g., forecasts, plan activations).
- NYCT Subways developed a SharePoint site to serve as the official repository for emergency management content and records relevant to NYCT Subways’ weather plan activities.

In line with historical precedent, all adopted business-process changes that occur throughout the year are formalized in the next publications of NYCT Subways’ various weather plans.

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If you have any questions or need any additional information, please feel free to contact us.

Very truly yours,


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