

Recommendations on Metro's Code of Conduct: Public Safety Advisory Committee

About these recommendations

While PSAC acknowledges the work Metro is undertaking on the Code of Conduct, the committee would like to emphasize that Metro should expand its focus beyond solely revisions to the Code of Conduct text. Committee members would like Metro to better articulate how the revised Code (and resulting enforcement actions) support the agency's new vision for public safety. As explained to the committee, Metro's proposed revisions to this policy document are unlikely to bring about the "safe, dignified, and human experience" the agency committed to when it adopted [the PSAC-drafted Mission and Values for public safety on the Metro system](#).

Ensuring that all Metro users have a safe, dignified, and positive experience is a responsibility shared by riders AND the agency. The committee calls on Metro to be a visionary leader and adopt a transformative, holistic approach to public safety that not only updates the Code of Conduct, but also shifts funding away from law enforcement and contracted security services to support investments that support riders. This includes investing in infrastructure, operations, and maintenance to enhance the rider experience; dedicating more resources to station and vehicle cleaning and upkeep; continued investments in employee training; and devoting staffing resources to ensure that employees are fairly compensated. These investments will ensure that Metro is leading by example and enables riders to adhere to the shared values that the agency aims to uphold.

Additionally, any edits to the Code of Conduct should be explicitly linked to the aforementioned Mission and Values statements. The committee recommends that Metro staff clearly articulate this linkage to affirm its commitment to the adopted values of:

- "Implementing a Human-Centered Approach"
- "Emphasizing Compassion and a Culture of Care"
- "Recognizing Diversity"
- "Acknowledging Context"
- "Committing to Openness and Accountability"

Metro's Role in Code of Conduct Compliance & Enforcement

1. **Fund improvements that support equitable Code of Conduct implementation by shifting funding from law enforcement and contract security:** As PSAC has previously stated [here](#), [here](#), and [here](#), funding should be shifted away from law enforcement and contract security services to support a transformative vision of public safety. Metro's [Respect the Ride campaign](#) is an example of a program which should receive reallocated funding under this directive.

- 2. Enhancing customer experience improves public safety and adherence to shared values:** The committee calls for Metro to broaden its vision of public safety to include customer experience elements, such as those named in [Metro's Customer Experience Plan](#) and [ACT-LA's Metro as a Sanctuary report](#). Investing in additional seating, bathrooms, and trash cans provides infrastructure that allows riders to adhere to the norms spelled out in the Code. Likewise, investments in shops, street vendors, and performers create station areas that are for people and meet Metro's adopted value of "Implementing a Human-Centered Approach." A station that is comfortable and welcoming will improve public safety by reinforcing the Code of Conduct's call for shared stewardship of transit spaces.
- 3. Metro must lead if riders are to follow:** As seen in [Metro's FY23 Budget survey](#), transit riders list cleaner stations and vehicles at or near the top of their priorities for Metro's budget. The committee calls for Metro to increase station and vehicle cleaning system-wide as a way to lead by example. A consistently clean and well-maintained system is less likely to have riders violate our shared values of cleanliness.
- 4. Invest in staff training and increased compensation to support Code of Conduct goals:** Funding should be shifted to better support current employees through training and compensation. To ensure that Code of Conduct implementation is equitable and reinforces treating riders with dignity, Metro should continue to invest in staff training, strategic deployment of staffing resources, and increased compensation to make frontline jobs more attractive. In the context of supporting the Code of Conduct revisions, this includes additional investments in unarmed personnel like transit ambassadors, vehicle operators, and custodial staff.
- 5. Any infractions of the Code of Conduct should not be financially punitive or removal of access to Metro services:** In keeping with Metro's adopted value of "Acknowledging Context," any Code of Conduct infractions should not result in a monetary fine or revocation of Metro system access. Given the racial disparities seen in the existing enforcement data, coupled with Metro's acknowledgement of low levels of fine remittance, this practice should be eliminated. Meanwhile, revoking individual's access to Metro for Code of Conduct violations further entrenches systemic inequality. As noted in Metro's Vision 2028 Strategic Plan, public transportation plays an integral role in access to economic and educational opportunities, essential services, and other necessary activities that support LA County residents in living successful and healthy lives. Punitively barring individuals, rather than seeking to rehabilitate them, continues an inequitable status quo.
- 6. Recognize and encourage good ridership behavior:** Metro should actively strive to build a culture of considerate ridership. Metro staff on vehicles and in stations should have the discretion to recognize and, where possible, reward riders who are exemplary transit users. Rewards can range from social media posts, to shared stories on Metro's The Source blog, to small financial incentives like TAP cards. There could be additional

synergy with Metro's free fare programs for students and leverage this opportunity to influence youth and develop a new generation of transit riders in Los Angeles.

Revising the Code of Conduct Document

7. **Structure the Code of Conduct as expectations, not behaviors:** Rather than drafting a document detailing what riders can not do, structure it as a series of expectations that both riders and the agency are to meet. The committee recommends Metro engage PSAC in a comprehensive drafting process to articulate these expectations for the Code of Conduct. Some PSAC members have called for a new Code of Conduct drafted from scratch. The text and framework of the current Code of Conduct can not facilitate PSAC's transformative vision outlined in Recommendation #1. Therefore a brand-new document would be drafted, with Recommendation #6 as its core tenet.

8. **Acknowledging context for vulnerable transit riders:** The committee also recommends that Metro include specific language in the Code of Conduct to acknowledge the different types of riders the system serves and acknowledges the diversity of experiences and needs each brings to the system. Specifically, the Code of Conduct should identify the systemic barriers and challenges faced by the vulnerable riders it serves. These groups include unhoused riders, riders with disabilities, women, youth, members of the LGBTQ+ community, and older adults, among others. The Code's expectations should be adjusted according to the social and economic realities affecting rider's experience on transit. The expectations for an unhoused rider with limited access to mental health services can not be the same as for a person who is housed and has a stable income. To ensure a "safe, dignified, and human experience" on the system and address those varied expectations, Metro should co-locate homeless services, elevator attendants, transit ambassadors, and other non-law enforcement alternatives according to each population's needs. Please see "Attachment A" (p. 9) for specific recommendations from CALIF-ILC's advocacy group related to Code of Conduct language and enforcement for riders with disabilities.

9. **Remove quality of life infractions that have racially and economically disparate impact:** The following sections in [Metro's current Code of Conduct](#) should be eliminated, as they are redundant with existing criminal law and are likely to disproportionately punish low-income and unhoused riders. **While PSAC acknowledges that some of the issues Metro's Code of Conduct is attempting to solve remain a challenge for the agency, the committee does not support addressing these challenges through a punitive Code of Conduct mechanism. As stated in Recommendations #5 and #7, PSAC supports a rehabilitative approach that creates a culture that values shared stewardship of the transit experience. The issues on the transit system are** better addressed through provision of services and enhanced infrastructure (as detailed in Recommendations #2, #4, and #8). See the table on the following page for sections recommended for elimination:

Section #	Description
6-05-040.A-B	<p>A. <i>Wheeled riding devices including bicycles, skates, skateboards, kick scooters, and other wheeled riding devices except wheelchairs and mobility aid devices, may not be ridden in Metro facilities or vehicles, except for public bike or roadways clearly intended for those types of devices. A person may carry or walk such wheeled riding devices in a safe manner on Metro facilities to park or board Metro vehicles.</i></p> <p>B. <i>Tandem, three-wheeled, or fuel-powered bicycles or other wheeled riding devices, are not permitted in, attached to, or on Metro facilities or vehicles. Bicycles or other wheeled riding devices over six (6) feet long are prohibited.</i></p>
6-05-050.A-I	<p>A. <i>Willfully blocking or impeding the free movement of another person.</i></p> <p>B. <i>Blocking an aisle, elevator, escalator, door, or stairway with one's body or an object, in a way that poses a danger, unreasonably impedes a patron's movement, or displaces a person.</i></p> <p>C. <i>Operating, stopping, or parking a vehicle in a location that is reserved for transit vehicles or is otherwise restricted.</i></p> <p>D. <i>Obstructing or impeding the flow of a Metro vehicle or interfering with the operation or use of transit services.</i></p> <p>E. <i>Preventing a door from closing.</i></p> <p>F. <i>Reclining on, placing objects on, or blocking a seat.</i></p> <p>G. <i>Occupying more than one seat.</i></p> <p>H. <i>Willfully interfering with the operator or operation of a Metro vehicle in a manner that affects the operator's control of the vehicle.</i></p> <p>I. <i>Impeding the safe boarding or exiting of passengers.</i></p>
6-05-070.A-D	<p>A. <i>Commercial or large size carts, dollies and strollers are prohibited on Metro vehicles, unless collapsed. If a small, personal use size stroller is occupied by a child or small cart is filled, then it must be securely held and not block passageways or seats.</i></p> <p>B. <i>Carts, dollies, strollers and large luggage that create an unsafe condition are prohibited.</i></p>

Section #	Description
	<p>C. <i>During crowded conditions or peak hours, remove children from strollers and materials from carts, and collapse, or wait for the next Metro vehicle that has room for the cart or stroller. This provision does not apply to wheelchairs or other mobility aid devices.</i></p> <p>D. <i>Carts, strollers, large luggage and wheelchairs or other mobility aid devices are to be transported in elevators or ramps in all Metro facilities and not on escalators.</i></p>
6-05-080.A-E	<p>A. <i>Abuse and harassment of Metro representatives or patrons is prohibited in Metro facilities and vehicles.</i></p> <p>B. <i>A person must comply with all lawful orders and directives given by an authorized Metro representative relative to Metro facilities or vehicles consistent with the code, including any instruction to leave a Metro vehicle or facility for safety reasons, for a violation of the code, or following a notice of ejection or exclusion.</i></p> <p>C. <i>A person receiving a Notice of Violation must provide accurate and complete identification and fare media when requested to do so by an authorized Metro representative.</i></p> <p>D. <i>A person may not falsely represent himself or herself to be a Metro representative through words, actions, clothes, insignia, badge, or equipment.</i></p> <p>E. <i>A person must wear a shirt, pants or skirt, and shoes, while in a Metro facility or vehicle. Infants being held or in strollers and persons in wheelchairs are not required to wear shoes.</i></p>
6-05-090.A-B	<p>A. <i>Persons must not engage in commercial activity in a Metro facility or vehicle without first obtaining a Metro permit and paying all required fees.</i></p> <p>B. <i>Persons who engage in permitted commercial activity in a Metro facility or vehicle must comply with all Metro instructions, safety requirements, and applicable laws.</i></p>
6-05-100.A, .C-L	<p>A. <i>Expectorating (spitting).</i></p> <p>C. <i>Urinating or defecating, except in a lavatory. This subsection does not apply to a person who cannot comply as a result of disability, age, or a medical condition.</i></p> <p>D. <i>Throwing an object at a patron, Metro representative, or a Metro facility or vehicle.</i></p>

Section #	Description
	<ul style="list-style-type: none"> <i>E. Gambling to win money or anything of value.</i> <i>F. Hanging from, swinging from, or attaching anything to hand rails. This does not apply to holding a handrail to stabilize one's body during transit.</i> <i>G. Inciting violence or posing a clear and present danger to other persons, including making verbal or visual gang affiliation or provocation signs.</i> <i>H. Engaging in or soliciting another person to engage in lewd conduct.</i> <i>I. Engaging in or soliciting another person to engage in prostitution.</i> <i>J. Placing feet or shoes on seats or furnishings.</i> <i>K. Defacing with graffiti, vandalizing, damaging, destroying, or tampering with Metro facilities or vehicles.</i> <i>L. Littering or dumping.</i>
6-05-110.A-G	<ul style="list-style-type: none"> <i>A. Eating, drinking, smoking, vaping, or carrying a lit cigar, cigarette of any type, or pipe, except in designated areas permitting that activity or is required by a disability accommodated pursuant to 6-05-140 Miscellaneous G.</i> <i>B. Placing chewed gum onto any surface in a Metro facility or vehicle other than into a trash receptacle.</i> <i>C. Drinking or possessing in an open container an alcoholic beverage, except in designated areas where there is notice that drinking alcohol is permitted and all required permits have been obtained.</i> <i>D. Possessing an illegal drug or substance.</i> <i>E. Being under the influence of alcohol, a drug, a controlled substance, toluene, or any combination of those items, and unable to care for one's own safety or the safety of others, or interfering with the use of a Metro facility or vehicle.</i> <i>F. Creating a public nuisance or a health hazard by dropping food other than in a proper waste disposal receptacle.</i> <i>G. Smoking or vaping is also not allowed within 20 feet of any Metro facility entrance, exit or operable window.</i>
6-05-120.A	<i>Loitering is prohibited in Metro facilities and vehicles.</i>
6-05-150.A-C	<i>A. Disturbing others by engaging in unruly behavior.</i>

Section #	Description
	<p><i>B. Failing to comply with a warning by a Metro representative to cease creating loud, boisterous or unreasonable noise, including unnecessary cell phone or other conversation, that is so loud, lengthy, sexually explicit, threatening, violent, or disruptive, that it causes a nuisance or unreasonably interferes with the use, operation, or enjoyment of the Metro facilities or vehicles for Metro representatives or patrons, or creates an unsafe condition, such as distracting operators of Metro vehicles.</i></p> <p><i>C. Playing a sound device, except when using headphones or earphones that make the sound inaudible to others unless a permit has been issued for usage of such sound device by Metro.</i></p>
6-05-160.A-B	<p><i>A. A person may not be in a Metro facility or vehicle with an unavoidable grossly repulsive odor so extreme it causes a nuisance, unreasonably interferes with the use, operation, or enjoyment of the Metro facilities or vehicles for Metro representatives or patrons, or creates an unsafe condition. Notwithstanding the foregoing, this subsection shall not apply to persons with odors directly related to a disability or medical condition unless the odor is so severely disruptive that it interferes with the use or operation of the Metro facility or vehicle by Metro representatives or patrons, or creates direct threat or an unsafe condition.</i></p> <p><i>B. Extreme odors may arise from a variety of sources, including one's body, possessions, clothing, food, chemicals or accompanying animals.</i></p>
6-05-180.A-C	<p><i>A. A person may not photograph, film, duplicate, record, or sketch a Metro facility or vehicle for commercial purposes without first obtaining a Metro permit and any other required permits, and paying all required fees.</i></p> <p><i>A person who photographs, films, or records in a Metro facility or vehicle must comply with all Metro safety requirements, instructions, licenses, and applicable laws including copyright laws.</i></p> <p><i>C. A person may photograph, film, record, or sketch a Metro facility or vehicle for non-commercial purposes only in public areas, unless otherwise authorized by Metro, and in a manner, at a</i></p>

Section #	Description
	<p><i>time, and at a place that does not interfere with Metro operations, or create an unreasonable risk to the safety or well being of Metro representatives or patrons. Prohibited activities shall include use of a tripod, or laying of cord or cables, in a walkway; use of a flash bulb that is blinding to patrons or Metro representatives; or creating congestion during an emergency evacuation.</i></p>

10. Review and update the Code of Conduct annually: The Code of Conduct should be a regularly updated document. Metro should consider consulting PSAC or another community oversight body to review outcomes annually.

11. Perform detailed outreach to advocate and community groups: As demonstrated by the memorandum in “Attachment A” (pg. 9) drafted by CALIF-ILC, an independent living center that provides advocacy programs and services for people with disabilities, Metro should perform extensive and detailed outreach to stakeholder groups when revising the Code of Conduct. It is essential to gather input from a wide variety of perspectives and find consensus between the varied positions. The level of detail in the memorandum is exemplar for the kind of nuance needed to update a policy document that affects different communities in different ways.

Facilitator’s note: Attachment A does not represent the views of PSAC. It is an example of the kind of engagement PSAC recommends Metro engage in.

Programs to Support Code of Conduct Policies

12. Expand the use of applications to allow riders to document needs, report incidents, and connect with non-law enforcement alternatives: Metro should investigate opportunities to make rider-facing applications (e.g., TransitWatch) more responsive to riders needs, including those beyond safety and security. Data provided by riders can help inform the allocation of non-law enforcement resources. To support Code of Conduct goals, riders should be able to use an application (or a similar tool) to make requests beyond those related strictly to security or law enforcement. Riders should also be able to identify areas that may need cleaning, report items that are broken or in disrepair, and identify locations where a fellow rider may benefit from the intervention of a mental health or homeless outreach service provider. This application should capture anonymized incident reports from riders, track Metro’s response, and specify outcomes or resolutions (including incidents where law enforcement intervened). Finally, Metro

should consult a community oversight board to determine data gathering and retention protocols, report outcomes, and advise on the deployment of non-law enforcement resources.

- 13. Make bystander or “upstander” training a central program of advancing the Code of Conduct:** The committee calls for Metro to advance and expand their bystander training programs as a cornerstone of equitably implementing the Code of Conduct. These programs should have high levels of involvement with transit riders and be promoted widely. Additionally, the agency should think creatively to integrate multiple forms for riders to be involved. For precedent, see [Antanas Mockus, former mayor of Bogotá, who used street performers, soccer yellow cards, and other forms of resident involvement](#) to transform a city struggling with public safety issues.
- 14. Clearly and playfully communicate through signage and advertising:** All signage and advertising should be clear and fun in its communication. They should stand out by being memorable and noticeable, rather than instructive. Signage alone can not be the primary means of informing riders of the shared values and expectation. Metro should invest in advertisements, social media campaigns, public service announcements, and public art in addition to infrastructure investments (e.g., staffing, bathrooms, trash cans, etc.) to improve the rider experience. **The committee recommends that one of the key messages Metro advertises should promote safety for all users on the Metro system. This messaging should specifically call out riders, community members, Metro employees and vehicle operators.**

ATTACHMENT A

Metro Code of Conduct
A Disability Perspective from Advocates at:
Communities Actively Living Independent and Free (CALIF)

Metro Code of Conduct

6-05-040

Wheeled riding devices

The use of skateboards, skates and other wheeled devices are a hazard for people with disabilities and older adults who cannot get out of the way. We support the continued prohibition of these items.

6-05-050

Blocking

People with disabilities and older adults have limited energy and ability to do their targeted activities. Having to maneuver around people blocking our path of travel can make a trip using Metro overwhelming.

We can't step over people and sometimes can't find a way around a person laying on the ground. Sometimes our movements around a person who is on the ground may be seen as aggressive and lead to a confrontation. We continue to support a prohibition on blocking.

6-05-060

Boarding, exiting, and seating

B. Maintaining control of children

At times, children block the paths of wheelchairs or jump out in front of an oncoming wheelchair. Parents need to control their children to keep them from getting injured. Children are also naturally curious and tend to grab the joysticks of power wheelchairs which causes our chairs to go out of control. This is especially dangerous at rail stations. We continue to support Metro's efforts to remind parents to maintain control of their children.

D. Yield priority, reserved, wheelchair or similarly designated seating to older adults and individuals with disabilities.

We continue to support Metro's efforts regarding the designated seating.

E. A Personal Care Attendant (PCA) must travel with a patron who displays an Access Services TAP card with a PCA eligible designation at all times when using the Metro bus and rail system, including boarding and exiting at the same location and traveling in the same bus or rail car.

We continue to support Metro's policy in accepting Access Services TAP cards for rider fare. However, we encourage Metro to move to a fareless system for all disabled riders and older adults. The use of TAP cards is not accessible to all riders. Many people cannot pass through the turnstiles while holding a TAP Card. It is an accessibility issue that denies some individuals the ability to ride on Metro.

6-05-080

Civility, compliance, and cooperation

F. Patrons unable to care for themselves, who do not exhibit an ability to comply with Metro's code, or who pose a safety risk, must be accompanied by a service animal or a responsible individual who can care for the patron when in a Metro facility or vehicle.

**** Disability issues should be put under a category of accessibility

This issue might have ADA violations. Who is to say who can take care of themselves and what is the criteria used to determine this? And why would a service animal matter? We recommend that this code is removed.

6-05-090

Commercial activity

We support the prohibition of vending on trains. Many times, illegal vending activities are centered around the wider wheelchair accessibility areas on trains. People bring wagons, trollies and large Igloo iceboxes

and block wheelchair access. This is a common problem on the Blue Line. We would like to see more enforcement of this code.

6-05-100
Disorderly conduct

J. Placing feet or shoes on seats or furnishings.

We support Metro in continuing to enforce the above item. Often buses and trains are at near capacity. This could end up denying someone who is an older adult or a person with a disability a seat. This could become a safety issue as it might lead to someone being forced to stand who cannot do so safely.

6-05-110
Food, alcohol, and drugs

E. Being under the influence of alcohol, a drug, a controlled substance, toluene, or any combination of those items, and unable to care for one's own safety or the safety of others, or interfering with the use of a Metro facility or vehicle.³⁰

We support Metro efforts to stop intoxicated individuals from riding Metro and entering Metro's facilities. But we want to express our concern that there are many types of disabilities that mimic behaviors of someone who is intoxicated. Care must be taken when trying to determine if someone is truly intoxicated or has a disability.

6-05-120
Loitering

We support the prohibition of loitering. Loitering creates barriers which hamper the ability of older adults and disabled people to ride Metro safely. We would encourage Metro to use more enforcement.

6-05-140
Miscellaneous

G. Individuals with disabilities may visit *metro.net*.....

**** Once again, we recommend a specific section on accessibility.

6-05-150
Noise

We support Metro's effort to limit loud noise. Individuals who have disabilities like autism, dementia and cerebral palsy can be adversely affected by it. However, we feel that Metro should include a sentence or two recognizing that certain disabilities can lead to someone talking loudly and or making noise. Under the ADA they are entitled to a reasonable accommodation.

6-05-160
Odors

A. A person may not be in a Metro facility or vehicle.....

We believe that even if the person has a disability, if the odor is bad enough, they should be asked to leave. From our Disability Point of View, we would recommend that the rule be enforced.

6-05-190

Safety

5. Standing, lying or climbing on a sign, bench, passenger shelter, trash container or planter.

We are concerned that someone with a disability or an older adult might need to lay down on a bench for a short period due to a disability or might be forced to sit on a trash container due to exhaustion. If they are there for a long period of time, they should be asked if they're okay. If they are just resting until their bus or train arrives, then it should be permitted.

Sections C and D:

We are willing to report situations to you, but you need to make a greater effort to have staff that can understand us. Phones and communication devices all need to be ADA compliant.

6-05-200

Signs

D. Persons shall also obey all other notices and signs posted by Metro in a Metro facility or vehicle.

We need better signage to help disabled people evacuate when needed. Signs need to be accessible and at a good eye level. We feel that the signage on Metro rail cars on what to do in an emergency is really lacking.

6-05-230

Fares

We would like Metro to go fareless for older adults and people with disabilities. Many in our community have great difficulty handling money and TAP cards. A fareless system would truly help to make Metro accessible.

6-05-240

Enforcement

When people break the rules, we would encourage those riders to be removed from the vehicle and made to take the next vehicle. We also support a loss of riding privileges.