

LA Metro Public Code of Conduct Review

LA Metro is assessing its public-facing code of conduct with the goal of reimagining a code of conduct that is more accessible and customer centric. The review presented in this document includes an evaluation of codes of conducts across different industries, including public transportation, for their content, distribution methods, accessibility, and reach in both physical and digital space. This review identified a few key areas in which LA Metro could focus its code of conduct assessment efforts.

1 Code of Conduct Comparison

Codes of conduct (see Section 1.1 for other commonly used terms), should be a concise list of rules that are used to control the safety, security, and quality of life of people while utilizing the space to which they apply. Codes of conduct can be backed by an administrative or civil penalty and enforced by security, police, and/or a combination of staff. Most U.S. public transportation agencies have similar baseline rules enhanced by whatever specific rules are required for that particular system, such as tunnel trespassing or ferry operations. New rules may also be added by an entity in response to a changing environment, such as requiring a mask or face covering and prohibiting sneezing and coughing on others as a result of public health emergencies (see Section 1.3 for additional discussion). Table 1 outlines various common code of conduct areas covered by a range of example transit agencies who post their codes of conduct online. Table 2 provides two examples of codes of conduct from the mall industry that are available online.

Table 1. Example Common Code of Conduct Areas by Transit Agency

Conduct Area	Transit Agency										
	BART	CATS	MCTS	MSP Metro	NY MTA	SACRT	Sound Transit	TriMet	UTA	Valley Metro	WMATA
Designated seating			X	X	X	X	X	X			X
Distract, disrupt driver or service	X		X	X	X		X	X	X	X	
Eating, drinking restrictions	X		X	X	X	X	X	X	X	X	X
Flammable substances, hazardous materials	X	X			X	X	X		X	X	

Conduct Area	Transit Agency										
	BART	CATS	MCTS	MSP Metro	NY MTA	SACRT	Sound Transit	TriMet	UTA	Valley Metro	WMATA
Harass, disrupt others ¹	X					X	X	X		X	
Correct Fare, Paid Fare Area	X		X	X	X	X	X	X		X	
Littering	X	X			X	X	X			X	X
Loitering, vagrancy		X			X					X	
Loud music, conversation, noise	X	X	X	X	X	X	X	X	X	X	X
More than one seat			X	X	*		*		*		
Non-service animal restrictions	X	X	X	X	X	X	X	X		X	
Required clothing, shoes	X		X	X		X	X		X	X	X
Respect the ride, others			X	X	X	X	X				
Skateboarding, scooters, rollerblades		X			X	X			X	X	
Soliciting, non-transit activities	X	X			X	X	X			X	
Spit, urinate, defecate	X	X				X			X	X	
Smoking, alcohol, other drug use	X	X	X	X	X	X	X	X	X	X	X
Stroller, carts, baggage storage			X	X	X	X	X	X	X	X	
Trespass	X	X			X						
Vandalism, graffiti	X	X			X	X			X	X	
Violence, including threat of	X		X		X	X			X	X	
Vulgar language, gestures	X	X	X	X	X				X	X	
Weapons	X	X			X		X				

See Appendix B for additional references and links to code of conduct.

* Agencies with the asterisk reference no lying down or feet on seats but do not specify more than 1 seat as a blanket statement.

¹ Between its 2013 posted code of conduct and its 2021 update, BART added to its list of prohibited acts “sexual harass[ment of] a BART employee or passenger (non-criminal)” in addition to the previously included prohibition of “treaten[ing], harm[ing] or assault[ing] a BART employee or passenger.” This addition could be considered an example of a transit agency updating its code of conduct in response to a changing environment, as the transit industry as a whole has seen an increase trend in harassment and assault of its operators over the past several years and especially during the COVID-19 pandemic.

Table 2. Example Codes of Conduct from the Mall Industry

Simon Mall Properties, Indianapolis, IN ²
<p>Thank you for choosing a Simon shopper center as your destination for shopping, great food, and entertainment. It is our desire to provide you with an enjoyable and delightful shopping experience. We ask all of our guests to conduct themselves in a respectful way in accordance with the code of conduct and all laws and local ordinances.</p> <ul style="list-style-type: none"> • Wear appropriate clothing. Hoodies are acceptable. • Disruptive behavior is prohibited. • No weapons. • Possession of open alcoholic beverages, except in designated areas, is prohibited. • No solicitation. • No pets (except service animals). • Engaging in non-commercial expressive activity, not sponsored by the center, is prohibited. • Smoking, except in designated areas, is prohibited. • No loitering. • No photographs or video recordings of any kind for commercial use. Video is acceptable for non-commercial and non-disruptive purposes. • Use of transmitters, radar, lasers, beacons, cellular triangulation, GPS, Wi-Fi, Bluetooth, magnetic or barometric technologies, or geographic information systems of any kind to capture geographic location or spatial data for commercial use is prohibited.
West Roads Mall, Omaha, NE ³
<p>This center is committed to providing an enjoyable shopping experience for our guests.</p> <p>While visiting this mall, the following general activities will not be accepted:</p> <ul style="list-style-type: none"> • Violations of the law • Any activity that threatens the safety of our guests, tenants and/or employees • Any activity that threatens the well-being of the property • Any activity that disrupts our pleasant, family-oriented shopping environment • Any activity inconsistent with the general purpose of the property, which is shopping, dining, visiting theaters or offices for business purposes • Any activity that would disrupt the legitimate business of the property and its tenants <p>Examples of specific activities that are prohibited include but are not limited to:</p> <ul style="list-style-type: none"> • Disruptive profanity, vulgar or threatening language • Unnecessarily blocking walkways, roadways, or storefronts • Running, horseplay or disorderly conduct of any nature • Excessive loitering • Operating unauthorized recreational and/or personal transportation devices in the shopping center • No firearms or illegal weapons

1.1 Ownership and Control of Codes of Conduct

Where a transit agency’s code of conduct resides within the agency and who “owns” it can impact the code’s content, format, distribution, and overall effectiveness. In a search of codes of conduct available online, ownership was not always clear, but it generally appears that the transit agency itself owns and controls the code of conduct,

² <https://www.simon.com/legal/code-of-conduct>

³ <https://www.westroadsmall.com/en/code-of-conduct.html>

typically through the Office of the CEO/General Manager, though other departments or divisions may be engaged in updates or revisions. It is typical that the agency board of directors has the ultimate approval of code updates or changes. This is true even when the underlying code or law is owned by another agency such as a city or State. In TriMet's case, the agency controls its code of conduct, which is backed up by TriMet code and City code. Information on this topic is limited online; additional information on code of conduct ownership and control is pending further input directly from transit agencies.

1.2 Terms for Code of Conduct

Terms for codes of conduct vary by organization and across industries. Common terms are listed below.

- Code of Behavior
- Rules of Conduct
- Abide to Ride
- Rules and Etiquette
- Standard Procedures
- Rules Conduct and Behavior
- Code of Ethics
- Guidelines
- Code of Practice
- Common Sense Guidelines⁴

1.3 Updating Codes of Conduct in Response to the COVID-19 Pandemic

Due to the current COVID-19 pandemic risks and new information for rider and operator health and safety, some transit agencies are updating their codes of conduct and adding precautions to protect passengers and staff. Figure 1 shows an example sign about wearing a face covering.

⁴ King Metro Guidelines <https://kingcounty.gov/depts/transportation/metro/about/safety-security/code-of-conduct.aspx>

Figure 1. Example Communication for Wearing a Face Covering on a Transit Vehicle*New Jersey Transit advertisement to riders (April 2020)*

The American Public Transportation Association (APTA) published a guide⁵ to safeguarding riders and employees during the COVID-19 pandemic. The guide includes recommendations that can be incorporated into transit agency codes of conduct and communication strategies. Examples include:

- Identify and implement persuasive messaging to encourage rider vigilance with wearing masks/face coverings and physical distancing, considering the CERC framework as a resource: <https://emergency.cdc.gov/cerc/>
- Adapt and apply the communication tools and resources provided by CDC: <https://www.cdc.gov/coronavirus/2019-ncov/communication>
- Communicate boarding considerations such as “rear door boarding only” and/or “face covering required” on transit vehicles with the destination sign and automatic voice announcements inside/outside of vehicle at every stop.
 - Frequent operator and station announcements (through the public address system) about:
 - (1) Precautionary measures the agency is taking.
 - (2) The value of passengers maintaining a log of their transit trips, including time of trip, vehicle number, route, seating position, number of riders, etc.; riders with smartphones can document with one or two photos when on the vehicle.
- Create a COVID-19 “Rider Responsibility” campaign, using all available media, centered on the following messages:
 - Do not ride if you have any indication that you might be ill or have been exposed to someone with COVID-19; if riding transit is your only way to get help, wear a mask/face covering, cough into your elbow, and minimize touching surfaces with your hands.
 - During any local “stay-at-home” period, only use public transit for essential trips.

⁵ [https://www.apta.com/wp-content/uploads/COVID-19 Transit Guide REVISION-2020_08_11.pdf](https://www.apta.com/wp-content/uploads/COVID-19_Transit_Guide_REVISION-2020_08_11.pdf)

- Wear a mask/face covering
- Physical distance from other customers.
- Avoid interactions with the operator/conductor/engineer and respect his/her need to distance from passengers.
- If you feel uncomfortable on a specific vehicle for whatever reason, get off and take the next vehicle.

1.4 Accessing Codes of Conduct Online

The example codes of conduct referenced in this section are all available online, but the ease of finding them varies. Table 3 summarizes the ease of accessing each of the codes of conduct included in Table 1 as well accessing LA Metro’s code of conduct. Ease of access is assigned a rough order of magnitude value evaluated using the combination of how many “clicks” it takes to navigate to the code of conduct from a transit agency’s home page. When codes of conduct could not be located by navigating the website, an attempt was made to search “code of conduct” and “rider rules” in the transit agency website’s search function. In several cases, the codes of conduct were only found using outside search engines (e.g., Google). In general, the most intuitive location for posting online codes of conducts was found to be under the agency’s equivalent of “How to Ride” or “Plan Your Trip.”

Table 3. Ease of Accessing Codes of Conduct Online

Transit Agency	Ease of Access	Location	Comments
LA Metro	Hard	*About Metro-Ethics *Safety/Security – Rider Safety *Riders with disabilities	Note there are three versions of “Code of Conduct” found on the LA Metro website. One is aimed at employee/contract ethics codes, one is a 26-page brochure: “Metro Customer Code of Conduct”, and one is 3-page brochure “Everyone Deserves to Enjoy the Ride”
BART	Easy	Using BART	
CATS	Hard	Not found	
MCTS	Easy	Rules for Riders	
MSP Metro	Easy	Help-How to ride	Includes the statement “Some parts of the code are just common sense; others are dictated by state law .”
NY MTA	Medium	Safety and security	Includes fines for violations and state law citations for the rules
SACRT	Hard	Safety>Rules and Regulations	Could not navigate to from homepage. Search function on website difficult to find at the very bottom of the page without the common magnifying glass icon. Code of conduct difficult to identify in search results.
Sound Transit	Easy	Ride with us-Rules and Etiquette	
TriMet	Easy	Guide>Rules for riding	Located via menu bar <i>Guide</i> dropdown and clicking <i>Rules for riding</i> . The bottom of the code of conduct includes link to TriMet Code and Portland City Code .

Transit Agency	Ease of Access	Location	Comments
UTA	Medium	How to ride-rider rules	
Valley Metro	Easy	How to ride-Respect the ride	
WMATA	Easy	Rider Guide-Rules and Manners	Includes versions of code of conduct for bus and rail.

2 Posting Physical Code of Conduct Signage

Posting codes of conduct online can be limited in impact in that, generally, people must know to look for them. In contrast, posting physical code of conduct signage helps deter negative behavior and communicate to each person what is expected of them while using the space. Codes of conduct can also communicate the potential consequences for violations. For public transportation, codes of conduct should be posted on system vehicles, trains, stops, platforms, and public buildings.

Consistent, clear, and well-maintained signage, including codes of conduct, throughout a transit system strengthens both real and perceived security of that system and its users. It is also important not to *over* post signage, which risks creating so much noise that users of a system tune out the signage altogether. Balance and strategic placement are key to effectively posting code of conduct signage, especially in busy public spaces like public transit.

2.1 Visual Design Components

The following attributes are widely recommended for code of conduct signage visual design components:

- Open location with adequate lighting
- Bright/exciting
- Include images and graphics
- Easy navigation
- Avoid mixed messages
- Align with company branding
- Reflect with the company culture

Refer to **Error! Reference source not found.** for visual examples of publicly posted codes of conduct.

2.2 Accessibility Components

All types of signage on a system should meet baseline standards for accessibility, design, and branding and be detectable, conspicuous, legible, and comprehensible.

Factors to consider include font and size of text, language(s), symbols, placement and color scheme of the sign, and overall purpose of the sign (e.g., for security, for wayfinding, for general information, etc.). Standards are context-specific and dependent on the purpose and use of the sign.

In general, all types of signs are more user-friendly when they use fewer words and rely more heavily on common symbols and images to communicate. This is particularly important in multilingual spaces where English cannot be assumed to be a first language or spoken at all by users of the space. It is also helpful to consider how symbols could be interpreted in different cultural contexts, especially in spaces that see high numbers of international tourists.

For when text is used on posted signage, Table 4 outlines the general rule of thumb to increase lettering height by 1 inch for every 10 feet of viewing distance.

Table 4. Letter Height & Viewing Distance for Person with 20/20 Vision

Letter Height (in)	Ideal Readable Distance (ft)
3	30
4	40
5	50
6	60
7	70
8	80
9	90
10	100

Additional standards exist depending on the intended purpose of the signage, such as the Occupational Safety and Health Administration (OSHA)-endorsed American National Standards Institute (ANSI)/ National Electrical Manufacturers Association (NEMA) Z535 best practices for safety signage. ANSI/NEMA Z535 provides guidance on colors, symbols, application, and use for safety signage. In the California Manual on Uniform Traffic Control Devices (CA MUTCD, revised March 2020), the California Department of Transportation (Caltrans) provides guidance on the purpose and use of signs and on sign design such as shapes, colors, dimensions, symbols, location, and lettering size and style. The CA MUTCD also advises against excessive use of signs and how to avoid surpassing that threshold. It should be noted that the CA MUTCD is focused on roadway signage, though it does provide guidance for signage at transit and rail interfaces with roadways such as signage for rail grade crossings, for marking light rail transit vehicle dynamic envelopes, and for directing road users to a light rail transit station.

3 Assessment of LA Metro's Code of Conduct

3.1 LA Metro's Existing Code of Conduct

Preliminary review found that that LA Metro's code of conduct:

- Is not accessible in both the sense that is difficult to locate it online and there are three locations and multiple versions (not all focused on Customer Code of Conduct) and that the text and language is not user friendly. Finding the passenger code of conduct takes some hunting and does not easily come up when searching the website. The first search result returned provides the Ethics “code of conduct”, not the rider’s code of conduct. The other links were much more difficult to find.
 - Via Safety & Security on Metro: <https://www.metro.net/riding/safety-security/#:~:text=Customer%20Code%20of%20Conduct>
 - Via Accessibility on Metro: <https://www.metro.net/riding/riders-disabilities/#:~:text=Metro%20Customer%20Code%20of%20Conduct>
 - Note: The “English” link and the “Spanish” link both go to the English version of the Code. Unable to locate Spanish version except through the Metro Transit Court site.
 - Via LA Metro Ethics: <https://www.metro.net/about/ethics/> . This is the Ethics code of conduct, not a passenger “code of conduct.”

Within the current code, there are over 60 violations or warnings that are delineated. Several have multiple types within a category, such as “Unsafe Conduct” or “Failure to obey Signs”.

3.2 Legal Status of LA Metro’s Code of Conduct

LA Metro’s Code of Conduct is a mix of criminal and administrative violations. Approximately 33% of the code of conduct items are tied to the California Penal Code or California Public Utilities Code.

ATTACHMENT A Transit Agencies Code of Conduct

Transit Agency	Level of accessibility	Location	Link	Agencies that include any requirements involving using more than 1 seat and or/ Excess luggage	Example
LA Metro	Hard	*Safety & Security/Rider *Resources About Metro-Ethics *Riders with Disabilities (FAQs)	https://www.metro.net/riding/safety-security/(Rider Safety Resources) https://www.metro.net/about/ethics/#code-of-conduct https://www.metro.net/riding/riders-disabilities/#:~:text=Metro%20Customer%20Code%20of%20Conduct	Yes	
BART, San Francisco	Easy	Using BART	https://www.bart.gov/sites/default/files/docs/Customer%20Code%20of%20Conduct%20Updated%204%202022%2021.pdf	No	
CAT, Charlotte, NC	Hard	Not found		No	
MCTS, Milwaukee, WI	Easy	Rules for Riders	https://www.ridemcts.com/how-to-ride/rules-for-riders	Yes	<ul style="list-style-type: none"> No riding for multiple roundtrips on the same bus. Riders may not lay down, place feet on seats, or take up more than one seat. Only service animals or animals in a closed pet carrier that fits on the passenger's lap are allowed.
MSP Metro, Minneapolis, MN	Easy	Help-How to ride	https://www.metrotransit.org/how-to-ride State law included as link	Yes	<ul style="list-style-type: none"> One seat per customer- Your bag belongs on your lap, not taking up the seat next to you.
NY MTA, NY, NY	Medium	Safety and security	https://new.mta.info/document/36821 State law included as link	No*	<ul style="list-style-type: none"> occupy more than one seat on a station, platform or conveyance when to do so would interfere or tend to interfere with the operation of the transit system or the comfort of other passengers; (2) place their foot on a seat on a station, platform or conveyance; (3) lie on the floor, platform,

					stairway, elevator, escalator, landing or conveyance; or (4) otherwise interfere with or impede the movement of passengers or personnel of the authority or the MTA in a station or on a stairway, elevator, escalator, platform or conveyance
SACRT, Sacramento, CA	Easy	Safety and Security- Abide 2ride	http://www.sacrt.com/safety/abide2ride.aspx	No	
Sound Transit, Seattle, WA	Easy	Ride with us-Rules and Etiquette	https://www.soundtransit.org/ride-with-us/know-before-you-go/rules-etiquette	No*	<ul style="list-style-type: none"> • Hold personal items, store in overhead racks or under the seat • Do not lie down or place feet on seats.
TriMet, Portland, OR	Easy	Guide-Rules for riding	https://trimet.org/guide/rules.htm State Law included as link	No	<ul style="list-style-type: none"> • Don't block the aisles or doors. • If you have a bag or bike, make sure it's not blocking the aisle or doorway. If you're standing, move back so others can board. On buses and MAX trains, we recommend using a folding "umbrella" style stroller. Large and double-wide strollers are not practical for use on TriMet. You can board the bus with your child in the stroller, and your baby or toddler may remain in the stroller if there is space in the priority seating area. Learn more about bringing a stroller on board.
UTA, Salt Lake City, UT	Medium	How to ride-rider rules	https://www.rideuta.com/Rider-Info/How-To-Ride/Rider-Rules	No*	<ul style="list-style-type: none"> • Strollers must be foldable and be able to fit safely on ramp platforms and vehicle lifts. • The placement of large items such as strollers is permissible in the securement area and priority seating only if riders in mobility devices do not need the area. • While riding the bus, federal law requires all riders to stay behind the white line located behind the driver. • All riders are required to obey reasonable requests from the vehicle operator or any other UTA representative. This includes whether carry-on items are acceptable. Conversations with the bus driver that

					<p>distract from the safe operation of the bus are prohibited.</p> <ul style="list-style-type: none"> Large items that do not block doors, aisles or priority seating and can be easily boarded through doors and aisles are permitted on buses and trains. Wet, leaking or items believed to contain hazardous substances are not permissible. Items must be able to be carried onto the vehicle by a single person in a single trip. On buses items must be loaded only through front doors. Passengers must control all items at all times.
Valley Metro	Easy	How to ride-Respect the ride	https://www.valleymetro.org/how-to-ride/respect-ride	No	<ul style="list-style-type: none"> Large items that do not block doors, aisles or priority seating and can be easily boarded through doors and aisles are permitted on buses and trains. Wet, leaking or items believed to contain hazardous substances are not permissible. Items must be able to be carried onto the vehicle by a single person in a single trip. On buses items must be loaded only through front doors. Passengers must control all items at all times. Large items that do not block doors, aisles or priority seating and can be easily boarded through doors and aisles are permitted on buses and trains. Wet, leaking or items believed to contain hazardous substances are not permissible. Items must be able to be carried onto the vehicle by a single person in a single trip. On buses items must be loaded only through front doors. Passengers must control all items at all times. Taking up more than one seat is prohibited. Saving or “holding” seats is also prohibited

WMATA	Easy	Rider Guide-Rules and Manners	https://www.wmata.com/rider-guide/rules/bus.cfm https://www.wmata.com/rider-guide/rules/rail.cfm	No	
-------	------	-------------------------------	--	----	--