


CITY OF LOS ANGELES
INTER-DEPARTMENTAL MEMORANDUM

Date: December 4, 2025

To: Honorable City Council
c/o City Clerk, Room 395, City Hall
Attention: Honorable Heather Hutt, Chair, Transportation Committee

From: Laura Rubio-Cornejo, General Manager 
Department of Transportation

Subject: **COST ANALYSIS AND METHODS OF ALTERNATIVE RESPONSE MODELS TO SUPPORT SAFETY OF BUS DRIVERS AND RIDERS ON THE TRANSIT SYSTEM**

SUMMARY

In response to Council File (CF) [24-0562](#), this report provides an assessment of various response models to support a safer environment for bus drivers that operate the Los Angeles Department of Transportation (LADOT) Transit Services and the transit riding public.

RECOMMENDATION

That the City Council NOTE and FILE this report.

BACKGROUND

LADOT has been actively working on strategies to improve bus driver and passenger safety. As reported in September 2024 ([Council File 24-0562 misc 09-26-24](#)), since 2023 there has been an alarming increase in assaults on bus drivers and passengers. As part of the response to address the escalation of these incidents, LADOT had re-initiated discussions with the Los Angeles Police Department (LAPD) Transit Services Division (TSD) to devise strategies and provide patrols and/or other services on DASH buses through a new Memorandum of Agreement (MOA).

In April 2025 ([Council File 24-0562 rpt dot 4-2-25](#)), LADOT provided an update on the status of safety measures underway that would improve safety of bus drivers and riders on LADOT Transit Services. The Transportation Committee of Council directed LADOT and the LAPD in consultation with the Chief Legislative Analyst (CLA) and the City Administrative Officer (CAO) to include in the security services plan the utilization of unarmed crisis response resources such as the Unarmed Model of Crisis Response (UMCR), and training for LADOT staff and contracted bus drivers on how to respond to incidents.

DISCUSSION

LADOT is required by the Federal Transit Administration (FTA) pursuant to 49 Code of Federal Regulations (CFR) 673 to manage safety risks on the transit system and has adopted a Public Transit Agency Safety Plan (PTASP) to memorialize our oversight responsibilities. To meet our obligations under the PTASP, LADOT convenes quarterly Safety Committee meetings, in part composed of front line bus drivers to help identify safety risk mitigations. In their General Directive No. 24-1, FTA has further required recipient agencies to complete and submit to the FTA a safety risk assessment related to assaults on transit

workers. Through the Safety Committee, front line bus drivers have expressed desire for LADOT to work with LAPD to create greater security presence on DASH buses to help deter assaults. While the LADOT and LAPD are developing a new MOA, LADOT staff and LAPD senior commanders continue to coordinate on non-patrol strategies; for example, improved communications, de-escalation, signage, and other calming strategies.

Description and Costs of Alternative Safety Models

To address the increase of incidents on DASH, LADOT has explored several options to address the types of incidents. The following summarizes each response model as a stand alone solution; however, the approach that LADOT elects may include hybrid solutions that take from each method to most effectively address the need.

LAPD Sworn Officer Patrols Option

This option would involve deploying sworn LAPD officers on buses as needed to establish greater operational awareness of the system, enforce the Rider Code of Conduct, and generally create a reassuring presence of safety for the riding public. LAPD would additionally provide support and training to drivers for better radio communication, de-escalation, when to access unarmed response services needed for crisis intervention, how to properly report a crime in progress, and how to handle special situations, such as hijacking, or customers refusing to exit a bus.

The advantages of contracting with LAPD are that police can enforce laws, including the Rider Code of Conduct. The presence of law enforcement can create a sense of assurance for bus drivers, transit workers, and law-abiding bus riding public, furthering LADOT’s zero tolerance for threatening behavior on the City’s transit services. Targeted deployment can identify specific solutions and call in resources when unarmed response is necessary to address the needs of bus riders who may be experiencing crises, while random deployment helps create an expectation that a law enforcement officer could board a bus.

LADOT is aware that law enforcement officers may not be best suited to address unhoused individuals in crisis on transit systems because they are not historically trained in mental health or social services. Alternative crisis response teams can offer more effective, compassionate support while reducing strain on policing resources. Partnering with LAPD would enable partnership with LAPD’s Systemwide Mental Assessment Response Team (SMART), a specialized unit that responds to mental health-related calls on an as needed basis.

An evaluation of the cost effectiveness of deploying uniformed LAPD officers on buses demonstrates it as a resource intensive option given hourly compensation, which can be mitigated by paying the fully-burdened overtime hours as opposed to a fully-burdened regular hourly rate. LADOT would need to reimburse LAPD for the fully-burdened regular hourly rate if LAPD were to deploy officers on straight time, which adds the full costs of fringe benefits that include pensions. **Table 1** below provides the base hourly rate, the fully burdened hourly rate, the base overtime rate, and the fully burdened overtime rate as determined by the Cost Allocation Plan (CAP) for the likely assigned police officer classification under the new proposed MOA.

Table 1. below-shows 2025-26 rates.

	Hourly Rate	Fully Burdened Hourly Rate	Overtime Rate (1.5)	Fully Burdened Overtime Rate
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Police Officer II	\$64	\$162	\$96	\$105
Police Officer III	\$75	\$190	\$112	\$125

Assuming a deployment of 30 hrs per week per officer, LADOT would be able to fund up to 11 Police Officer IIs within the assumed annual budget of \$1,825,000, which is the annual allocation of Proposition C (Prop C) Five Percent Transit Security Funds that LADOT expects to receive from Metro. Under the terms of a new MOA, LADOT looks to coordinate with LAPD on strategic targeted deployment as a means to keep costs low while achieving greater security presence on buses, which could leave available funds for a hybrid approach that also funds contracted security discussed below. Under a hybrid option of deploying sworn police officers on buses and private contract security at layovers, LADOT would be able to budget seven Police Officer IIs, while having nearly \$675,000 per year to pay for private security at layovers.

LADOT has increased coordination with LAPD as a safety risk mitigation to address the recent increase in assaults on bus drivers. This coordination includes preparing de-escalation training guide, video, and presentation for bus drivers, gathering specific details for crimes that transpire on DASH buses, and coordinating field visits to plan for potential LAPD deployment on buses.

Contracted Security Services Option

LAPD has a separate security services division, Security Services Division (SECS), which vets and approves private security companies, as it is their responsibility pursuant to Los Angeles Administrative Code (LAAC) Section 22.225.1 to provide building and facilities security services to non-proprietary departments. These non-sworn security guards may be armed or unarmed. Security guards are well suited to protect fixed posts, such as layovers. They may also patrol in their marked cars in situations where crime prevention and deterrence are preferable to a police response or presence.

Deploying contract security can be a cost effective solution to provide security presence at a single post, such as a bus layover, whereas police officers must respond to radio calls and critical situations. However, security officers cannot apprehend, arrest, or enforce the law, unless a felony occurs in their plain view. They may employ physical force only when there is an open and obvious fear of great bodily harm or death to them or others. They are not trained in mental health or social services and cannot enforce the Rider Code of Conduct.

Table 2 below shows the hourly rates for various levels of security guards that could be deployed for security services. If used with a private-security-owned car, the rate could be as high as \$80 per hour, depending on the level of security guard as shown below. Assuming a deployment of 40 hrs per week, LADOT could deploy up to 25 armed security guards or 17 professional security guards within the assumed annual budget of \$1,825,000. However, LADOT could maximize coverage as needed at the most problematic layover locations thereby reducing the total hours and personnel. Under a hybrid option of deploying sworn police officers on buses and private contract security at layovers, LADOT would be able to deploy up to four armed security guards, two armed security field supervisors, and two professional security guards within the assumed annual budget of \$675,000 per year to pay for private security at layovers.

Table 2. Security Guard Rates

Position	Security Guard		Security Guard / Bike		Security Guard / Vehicle	
	Regular	Overtime	Regular	Overtime	Regular	Overtime
Unarmed Security Guard	\$31.24	\$46.86	\$32.74	\$48.23	\$34.24	\$51.36
Armed Security Guard	\$34.73	\$52.10	\$36.23	\$53.48	\$37.73	\$56.60
Armed Security Shift Supervisor	\$37.66	\$56.49	\$39.16	\$57.86	\$40.66	\$60.99
Armed Security Field Supervisor	\$37.66	\$56.49	\$39.16	\$57.86	\$40.66	\$60.99
Post Commander	\$39.15	\$58.73	\$40.65	\$60.09	\$42.15	\$63.23
Professional Security Guard	\$50.84	\$76.26	\$52.34	\$77.63	\$53.84	\$80.76

Unarmed Crisis Response Services Option (supplementary to above services)

The Unarmed Model of Crisis Response (UMCR) pilot is a 24/7 program that deploys trained mutli-disciplinary teams to respond to 9-1-1 calls for service to support people experiencing different forms of behavioral distress. The UMCR teams include members that are trained to de-escalate encounters with distressed individuals. The UMCR team responds to 9-1-1 calls that involve mental health crises, well-being checks, drug use, indecent exposure, or when an individual is causing a disturbance of peace. The UMCR team does not respond to:

- acts of violence or threats of violence
- the incident requires medical attention
- the incident involves three or more individuals
- the person involved is confirmed to be under the age of 18

The Crisis and Incident Response through Community Lead Engagement (CIRCLE) Program acts in a similar capacity in different service areas in the City. [Attachment 1](#) shows the current UMCR and CIRCLE geographic coverage in the City.

LADOT met with UMCR leads in the CAO Office and CIRCLE leads in the Mayor’s Office to verify how these programs can be integrated as a response to increase safety on the LADOT Transit System. Based on their feedback, LADOT staff concluded that unarmed crisis response models could be best integrated into a hybrid security service model that leverages the strengths of each service as part of a transit safety ecosystem. LAPD TSD could train MV Transportation and LADOT Transit personnel on circumstances when transit workers should call in requests to 9-1-1 to access unarmed crisis response to support people in distress on the LADOT Transit system and further memorializes respective roles and strategies in the Standard Operating Procedures.

At this time, the unarmed crisis response models that the City relies on are limited in their ability to provide a proactive security presence on buses since these services are only deployed in response to calls to the 9-1-1 dispatch system where a trained Police Service Representative (PSR) directs the calls

based on the severity of the situation. They also cannot enforce the Rider Code of Conduct (See [Attachment 2](#)) or intervene when an assault is in progress. Since LADOT would not be able to enlist the two unarmed crises response models on a pro-active patrol basis, they were not included in the cost analysis. Further, LADOT would not be expected to reimburse these programs for calls for service since responding to such calls already falls within their programmatic mission.

Transit Ambassadors Option

The Los Angeles County Metropolitan Transportation Authority's (Metro) Transit Ambassadors Program, launched as a pilot in 2022, is a solution that provides a visible presence, builds relationship with passengers of a transit system by helping them navigate the system (ie. wayfinding), and in limited circumstances, provides support for riders experiencing crises. Since their main role is to provide a customer facing support in helping people navigate the system, they are typically deployed at rail platforms as opposed to buses, since customers on buses have already decided their needed service to reach their destination. Their role is both meaningful and limited in addressing riders experiencing crises since they are but one part in Metro's public safety eco-system that supports safety of both transit workers and the riding public. They are helpful 'eyes and ears' and can report threats in the Transit Watch App, though they can not enforce the Rider Code of Conduct or intervene when there is a threat of violence. They are equipped with a Naloxone nasal spray and have been able to revive passengers that have overdosed on opioids though they rely on other support teams at Metro to respond to customers experiencing a mental health crisis.

The Transit Ambassador model would be more limited on LADOT's Transit system, since there is no optimal location to provide a human wayfinding presence. Their presence may falsely imply a crime-suppression component, which may put them at risk of an assault rather than the means necessary to deter or resolve situations. However, they could be a solution to provide a presence on DASH buses to proactively identify passengers in need of social services and to potentially provide a greater sense of safety to riders by serving as 'eyes and ears', though that may be their only role.

The hourly rate for Metro's Transit Ambassadors supplied by RMI International, Inc. was \$26 per hour, though that contract has since expired and they now rely on in-house personnel as their Transit Ambassadors. If LADOT were to rely on in-house labor for transit ambassador services, LADOT would need to hire Community Service Representatives, whose job duties include similar services performed by Metro transit ambassadors, or create a new classification that aligns with the transit ambassador duties. The maximum base hourly rate for one Community Service Representative (CSR) is \$37.27 or \$77,819.00 per year, while the burdened hourly rate is \$88.79 or \$185,400 per year. A modest ambassador program that deployed three pairs of CSRs working single eight-hour shifts seven days a week would require, at minimum, eight FTE positions, which could cost up to \$622,552 per year in base salary wages and \$1,483,200 in burdened costs. There are currently no budgeted positions for Community Service Representatives within LADOT. If LADOT were to rely on in-house services, positions would need to be authorized in the Budget.

If LADOT were to rely on transit ambassadors for some form of customer service presence on buses (either through a contracted service or providing in-house staffing similar to Metro's current program), we would need to rely on a different funding source, likely Proposition A Local Return, than the dedicated funding that is available for security services under the Prop C Five Percent Transit Security Funds. Metro reimburses transit operators with Prop C Five Percent Transit Security Funds for eligible security services adopted in a Security Plan. Since the role of Ambassadors would be customer support as opposed to security services, they would not likely be eligible for reimbursement from Prop C Five

Percent Transit Security Funds. Metro had funded their Ambassador Program through their marketing or public relations budget. If LADOT were to pursue hiring transit ambassadors to deploy on DASH buses, we would need to prepare and release a new request for proposal (RFP), which could take 18 to 24 months to execute as there are no active public agency contracts that are assignable.

Available Funding

LADOT would rely on Prop C Five Percent Transit Security Funds to cover eligible transit security program costs. Five percent of Prop C funds are mandated by legislation to be spent directly on bus and rail security. Eligible costs include labor, equipment, and overhead. The fundamental goal of this set-aside was to help assure safety and security on transit which was enabled by Prop C to improve rail and bus mobility. The funding amount is determined by formula for each municipality within Metro's purview. LADOT expects between \$1,700,000 and \$2,000,000 annually. Metro requires these funds to be used by the recipient directly, or be given to Metro to use at their discretion, on our behalf.

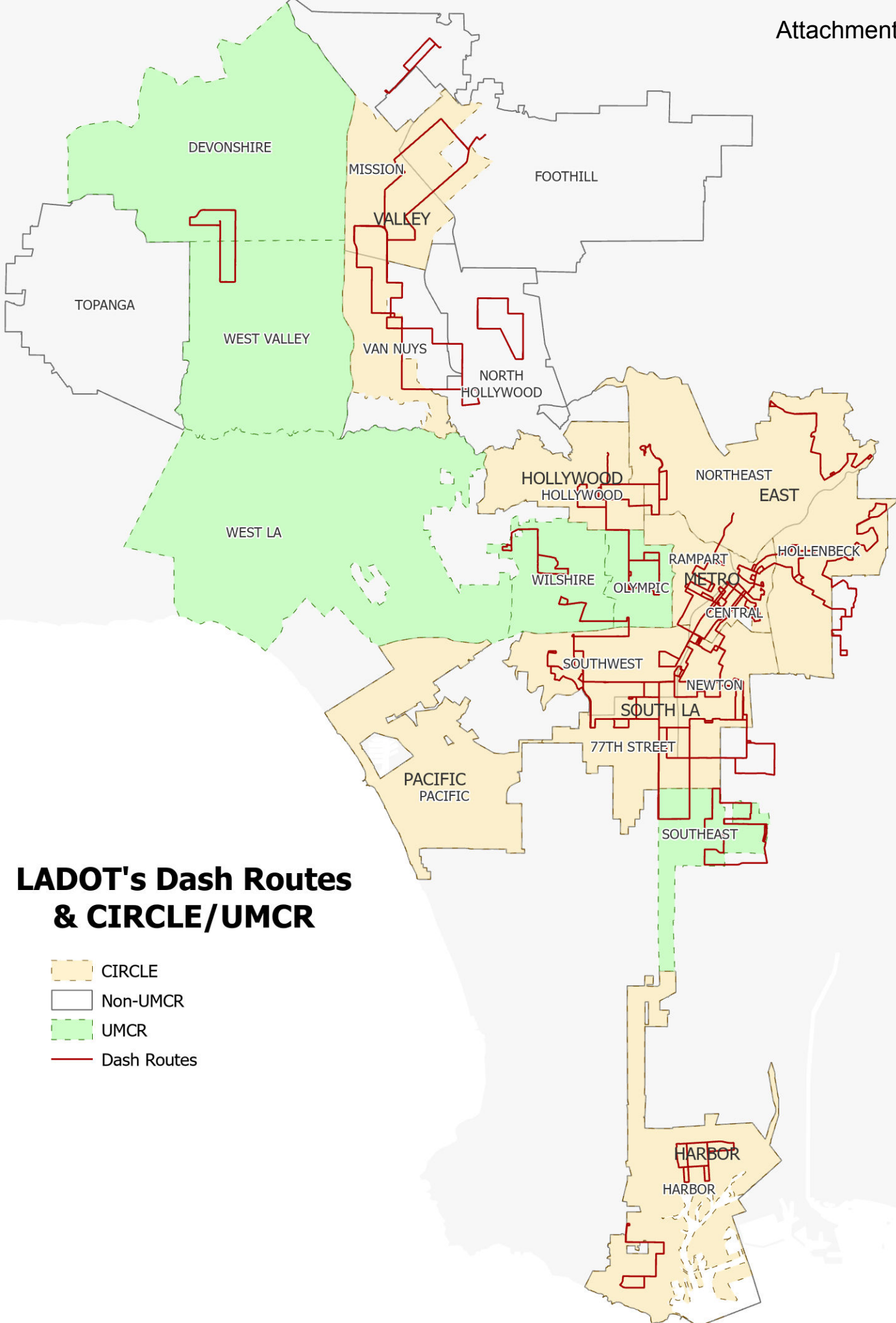
LADOT can leverage the best of the approaches described above within the available annual funds to ensure we are deploying the best tools to ensure a safe riding environment, increase safety for drivers when they are the most vulnerable, while also ensuring the riders experiencing crises are getting the support they need. Assuming an annual budget of \$1,825,000, LADOT could work with LAPD to deploy seven Police Officer IIs for 30 hours a week while leaving nearly \$675,000 available for contract security to deploy up to four armed security guards, two armed security field supervisors, and two professional security guards at fixed post locations at bus layovers. This hybrid approach would allow LADOT to work with LAPD to provide greater security presence, operational awareness, and help enforce Rider Code of Conduct, while leveraging private security for layover locations where drivers need support at the beginning or end of a shift. Additionally, under a new MOA, LADOT can work with LAPD, the CAO, and the Mayor's Office to train and develop operating procedures for our transit contractor on how to identify circumstances where the City's Unarmed Crises Response models can be relied on to support riders experiencing crises. As a next step, LADOT is routing the draft MOA with LAPD for review through different levels of approval, which will come before the City Council at the final stage.

FINANCIAL IMPACT





There is no impact to the General Fund. LADOT will front fund any costs for LAPD support and/or contract security services by Proposition A Fund 385, appropriation account 'Transit Bus Security Services'. LADOT will seek reimbursement for the security services by use of the Prop C Five Percent Transit Security Funds to cover eligible transit security program costs.

LRC:JK:bl:ds

Attachments



LADOT's Dash Routes & CIRCLE/UMCR

-  CIRCLE
-  Non-UMCR
-  UMCR
-  Dash Routes

LADOT TRANSIT
RIDER CODE of CONDUCT

Attachment 2

Welcome Aboard LADOT Transit!

The City of Los Angeles Department of Transportation – LADOT Transit (LADOT) has taken measures to make sure your travel with us is as safe and secure as possible. However, passengers also have a responsibility to themselves and others to ensure that everyone has a safe trip. In the interest of promoting a safe and pleasant journey for all those aboard, all passengers must abide by the LADOT Transit Code of Conduct. Any rider violating this code can be prohibited from using LADOT Transit services.

LADOT Transit will not tolerate violence of any form on its services. We are especially committed to the safety of those who provide your service, our Bus Operators. Any physical or verbal behavior that endangers or harms any of our employees or employees of our service providers constitutes a threat and will be prosecuted.

California Penal Codes 241.3/243.3/245.2 call for fines of up to \$10,000 and up to five years in jail for assault, battery or assault with a deadly weapon on a transportation worker.

CODE OF CONDUCT / RIDER RULES

- 1** Disruptive conduct of any nature by a passenger will not be tolerated on LADOT Transit buses. Such conduct will result in the ejection of the disruptive passenger from the bus and possible prosecution under the City of Los Angeles Criminal Code. LADOT Transit and its contractors may deny passage to any person who is exhibiting disruptive or threatening behavior towards the bus, patrons, or operators.
- 2** No passenger shall interfere with the safe operation of any LADOT bus. Riders must comply with the instructions of the bus driver regarding the vehicle's operation and matters of safety. Riders must remain behind the yellow line at the front of the bus, and stay seated or hold onto a rail or stanchion while the bus is in motion.

- 3** Riders are expressly prohibited from defecating, urinating, or vomiting on the bus. A corollary intoxication likely to produce the above, is prohibited. LADOT Transit and its contractors may deny passage to any person who is exhibiting the above behaviors.
- 4** Sexual harassment directed at a fellow passenger, LADOT Contractors or LADOT Transit employee is strictly prohibited. This includes, but is not limited to, indecent exposure, groping, and any lewd physical or verbal harassment.
- 5** Refusing to pay the proper fare is unlawful, and can result in arrest, fines and/or ejection from the bus.
- 6** Riders must respect their fellow passengers. Fighting, vulgar language, harassing other passengers, shouting, spitting, throwing an object, and pushing other passengers are prohibited at all times on LADOT Transit buses.
- 7** Passengers must occupy only one seat. Riders cannot lay down or occupy multiple seats.
- 8** Strollers, walkers, scooters, and shopping carts are not allowed unless they can be folded or stored in such a way that does not block the aisles and doorways. Skateboards must be stored in such a way that does not block the aisles and doorways.
- 9** Scooters must be 55 lbs or less to be brought on board DASH buses. A scooter must be folded and kept under the seat or in front of its owner without blocking the aisles or doorways, or blocking the safety of others.
- 10** Motorized bicycles or any bicycle over 55 pounds will not be accommodated on DASH bus bike racks. Non-motorized folding bikes with 20-inch or smaller wheels can be taken on board, but must be folded and stored under a rear seat so as not to block aisles and doorways. Motorized folding bikes or hoverboards are not allowed.

- 11** Riders must maintain good personal hygiene to prevent spread of disease. Any individual whose bodily hygiene or scent is so pungent as to create a danger of biohazard may be denied passage.
- 12** Riders must wear appropriate clothing (shirt, pants, shorts, dress, and shoes) at all times while riding. Riders wearing clothing with offensive or obscene pictures or sayings may be asked to cover or remove these articles of clothing or will be required to leave the bus.
- 13** Flammable liquids, excessive cleaning chemicals, fireworks, car batteries with acid or lithium ion batteries, are not allowed on any LADOT Transit bus.
- 14** Smoking (including e-cigarettes and vaporizers), drinking, and eating on any LADOT Transit bus is prohibited. Consumption of illegal drugs is prohibited in any form. Open containers and alcoholic beverages are prohibited.
- 15** Possession of any article defined as a weapon including firearms, knives, sharp objects, or martial arts, and self-defense items are prohibited on all LADOT Transit buses.
- 16** Congregating or loitering on a bus near the doorways and aisles or at a bus stop in a way that causes an inconvenience to other passengers or blocks entry and exit to a bus is prohibited.
- 17** Videotaping or taking commercial photographs on any LADOT Transit vehicle is prohibited without the prior consent of LADOT Transit.
- 18** Conversations between passengers or on cell phones shall be kept at a reasonable volume to not disturb other riders and not distract the bus driver from hearing important audible cues. Using a cell phone's speaker to engage in phone conversation is prohibited.

- 19** When utilizing the audio features of smartphones, tablets, and/or other sound generating devices, the earpiece of that device or a headphone/headset shall be used. The volume levels of any device or headphone/headset shall be kept at a level that is not heard by other riders.
- 20** Soliciting money or distributing literature on LADOT Transit buses is not allowed at any time.
- 21** Seats that are designated as Priority Seating must be made available for disabled and elderly passengers.
- 22** Pets and livestock are not allowed on LADOT Transit buses. However, service animals may accompany riders with disabilities. Riders are responsible for keeping service animals off the seats, ensuring the animals remain on the floor without blocking the aisle, and cleaning up after their animals. Service animals can be denied boarding if the animal is out of control or its owner cannot control the animal or if the animal poses a direct hazard to health and safety of the rest of the riders.
- 23** Any type of offensive behavior toward a fellow passenger, LADOT Transit employee, or LADOT transit contractor staff, including bus drivers based on that person's sex, race, color, national origin, religion, marital status, sexual orientation, gender identity, pregnancy, ancestry, age, military status, disability, genetic information, or any other status is prohibited by Federal, state and City of Los Angeles laws. Offenders may be subject to penalties or imprisonment under California Penal Code 243.4.

LADOT Transit reserves the right to modify and amend this Code of Conduct at any time. Please contact the LADOT Transit Customer Service Center at (213, 310, 323 or 818) 808-2273 to report any incident on an LADOT Transit bus or report it online at ladottransit.com/comments. In case of emergency dial 911.

TRANSIT SAFETY TIPS

Public safety is everyone's responsibility. If you see something, say something! Do your part to make it a safe trip. Be aware of your surroundings at the bus stop and on the bus, including the location of the nearest exit. Do not touch or move a suspicious package or substance, but do immediately notify the driver of the location of the package or substance. Keep personal belongings in your possession, and don't accept items from strangers.

Report suspicious behavior to your bus driver first. If you cannot notify your driver, call 911!

LADOT Transit's Code of Conduct are enforced through Federal and California State Law and Civil, Government, Penal, Public Utility and Vehicle Codes

<i>49 CFR 37.3</i>	<i>Penal Code §§ 243.3 & 243.35</i>
<i>ADA Title II, section 35.104</i>	<i>Public Utilities Code §99170(a)(4) 27</i>
<i>49 CFR 37.123</i>	<i>Penal Code §§ 640(b)(1) & (b)(3)</i>
<i>Civil Code § 54.25</i>	<i>Penal Code § 640(b)(1) B & P Code § 25662; H & S Code §§ 11350-11351, 11357</i>
<i>Civil Code §§ 54.1-54.2; 28 CFR 36.104</i>	<i>Penal Code § 647(f)</i>
<i>Penal Code § 640(b)(5)</i>	<i>Civil Code § 3479</i>
<i>Vehicle Code § 406</i>	<i>Government Code § 7597(a); Penal Code § 640(b)(3)</i>
<i>Penal Code § 640(d)(4)</i>	<i>Penal Code § 647(h) 34</i>
<i>Vehicle Code § 22500(i); Vehicle Code § 22523(b)</i>	<i>Penal Code § 647(e)</i>
<i>Public Utilities Code § 99170 Vehicle Code § 21701</i>	<i>Penal Code §§ 640(b)(2) & (d)(1)</i>
<i>Public Utilities Code § 99170(a)(2)</i>	<i>Vehicle Code §§ 21203 & 21712</i>
<i>Civil Code § 54.1</i>	<i>Penal Code § 625c</i>
<i>Penal Code §§ 241.3, 243.3, 243.35, 245.2, 640(b)(2) & 640(d)(1)</i>	<i>Penal Code § 647(c)</i>
<i>Penal Code § 602.7</i>	<i>Penal Code §§ 245.2, 247(b) & 171.7</i>
<i>Penal Code § 640(b)(4)</i>	<i>Penal Code § 171.7 41</i>
<i>Penal Code § 640(d)(2)</i>	<i>Penal Code § 640(c)</i>
<i>Penal Code § 640(d)(3)</i>	<i>Penal Code § 640(c)(3)</i>
<i>Penal Code § 640(d)(1)</i>	<i>Penal Code § 640(c)(2)</i>
<i>Penal Code §§ 241.3 & 245.2 21</i>	<i>Penal Code § 640(c)(1)</i>
<i>Penal Code § 647(a)</i>	<i>Penal Code § 640(e)</i>
<i>Penal Code § 647(b)</i>	
<i>Penal Code §§ 594, 640.5-640.8</i>	
<i>Penal Code § 374.4</i>	