My name is Kevin Garcia and I am a resident of Brooklyn, New York, where I am a graduate student in the City and Regional Planning program at Pratt Institute. I have lived in a few cities, including my hometown of Bridgeport, Connecticut, Los Angeles, California, and now, New York City. I have been a public transit rider since I was twelve years old and in each of these cities, I have relied on public transit to get to work, school, doctor's appointments, grocery shopping, and visiting family and friends. While each of these cities has different practices, I have experienced the benefits of some better practices that make traveling via public transit easier, such as express bus service, dedicated bus lanes, and modern fare payment infrastructure. Given all of this, I am writing to you today in regards to FHWA-2020-0001-0019, the revisions to the National Standards for Traffic Control Devices: Manual on Uniform Traffic Control Devices for Streets and Highways, and the impacts of the changes to the bus lane regulations. These revisions introduce new barriers to install environmentally responsible transportation infrastructure, do not help to reverse historic and growing inequities, and juxtapose President Biden's administration's climate and equity goals in the transportation system.

The novel coronavirus pandemic has nearly brought transportation to a screeching halt. Early in the pandemic, transit agencies across the world witnessed steep ridership declines and vehicle traffic decreased so much that some drivers took advantage of the empty roads to fuel their needs for speed.[1] However, throughout the pandemic, it has become clear the importance of public transit, in particular bus service. Although many state governors enacted stay-at-home executive orders, essential

[1] https://nyc.streetsblog.org/2020/04/05/speed-demons-the-scourge-of-reckless-driving-is-way-worse-than-we-thought/

workers were unable to remain home and had to continue traveling to work to help keep many of us safe while combatting the spread of the virus. Many of these frontline workers come from Black and Brown communities, are transit-dependent, are women, and rely on local bus service to get to work. It is critical to make sure that they have fast, reliable bus service now and after the pandemic. The key to making buses faster and reliable is separating them from gridlock.

If there was any doubt about the effectiveness of public transit, the novel coronavirus pandemic has demonstrated the benefits of fast, reliable public transit. As evidenced by the Metropolitan Transportation Authority[2], buses were able to move faster during the pandemic and it was the reduction in car congestion, from the disappearance of privately-owned vehicles, that allowed buses to travel faster. Furthermore, before the pandemic, it was evident in New York City that dedicating entire streets to buses allowed for the state agency to provide faster, more reliable, and safer transit.[3] Moreover, a graphic from the National Association of City Transportation Officials (NACTO), illustrates people driving in private cars can transport around 600 to 1,600 people per hour but with fewer cars on the road and more bikes and buses, that number skyrockets to about 10,000 to 25,000 people per hour.[4] While we are at a global standstill, the pandemic does present a prime opportunity for cities and states to look at retrofitting their streets and improving bus speeds everywhere.

Good public transit is a powerful tool to lift people out of poverty: it expands "circles of opportunity," providing access to a greater range of housing, jobs, and the

[2] https://www.nydailynews.com/coronavirus/ny-coronavirus-mta-bus-speeds-20200517-tbnem4wrbjdaramxkfu54y3twm-story.html
[3] https://nyc.streetsblog.org/2019/10/29/new-data-shows-no-seriously-the-busway-is-working/
[4] https://twitter.com/NACTO/status/1176923819472248833

now more than ever important healthcare options for car-free households. But you cannot have good public transit without the proper infrastructure in place. One bus does the job of as many as 55 single-occupancy cars, bringing commuters to work, students to school, shoppers to small businesses, and visitors to vibrant and thriving destinations. Public transit is often treated as an afterthought in street design across the country. This was true before the coronavirus pandemic and is still true today as traffic congestion returns to pre-pandemic levels across the nation.[5] However, as we continue to navigate through this pandemic, it is important to make it easier to retrofit our streets and design transit priority streets.

The red pavement markings are a proven tool to improve compliance with bus lanes and increase bus speeds. The draft MUTCD includes restrictions on the application of red bus lanes that will be detrimental to transit performance and transit riders, impeding efforts to make transportation systems more equitable and curb greenhouse gas emissions. Because cities rely on federal funds for most transit priority projects, and the release of federal grant funding is predicated on adherence to the MUTCD, compliance with these unnecessary mandates would be a prerequisite for cities to move forward with red bus lanes. The MUTCD rules would be a drag on improving bus service, instead of giving cities the freedom and flexibility to quickly prioritize transit on the street.

As highlighted by TransitCenter,[6] you should

[5] https://inrix.com/scorecard/
[6] https://transitcenter.org/end-the-red-tape-for-red-bus-lanes/

- remove the requirement for an engineering study before implementation of red bus lanes. Instead, enumerate the benefits of red bus lanes to transit performance;
- Remove the stipulation that red pavement cannot be used for part-time bus lanes, allow pick-ups and drop-offs, or allow motorists to make right turns.
- Remove the stipulation that red pavement cannot be used for part-time bus lanes, allow pick-ups and drop-offs, or allow motorists to make right turns.

If we fail to redesign streets to include bus lanes to accommodate riders' needs now and post-pandemic, the status quo will continue: reduced speeds due to traffic congestion, crowded buses, extended commute times, and riders confused about their bus arrival times. This is worst during peak travel hours when roads are most crowded, but bus riders need timely service most. Prioritizing infrastructure for buses reduces traffic, makes buses faster and more reliable, grows ridership, and reduces carbon emissions. Improved bus speeds can help transit agencies keep their riders, capture new customers, and help the country become a leader in the transit world. But all of this is not possible if the revisions to the MUTCD are passed. Thank you for your time.