



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF TRANSPORTATION
HARRISBURG, PENNSYLVANIA 17120

OFFICE OF
SECRETARY OF TRANSPORTATION

October 25, 2002

Office of Technical and Informational Services
Architectural & Transportation Barriers Compliance Board
1331 F Street NW Suite 1000
Washington DC 20004-1111

Re: Review Comments on the
Draft Guidelines for Accessible
Public Rights-of-Way

Gentlemen:

We are forwarding the Pennsylvania Department of Transportation's (PENNDOT's) review comments for the subject Draft Guidelines by electronic mail. These comments reflect our agencies personal review and our agreement in many sections of the Guidelines with the review comments generated by the American Association of State Highway and Transportation Officials (AASHTO) and forwarded under separate cover.

Thank you for this opportunity to review and comment of this proposed ADAAG guidelines.

Sincerely,

A handwritten signature in black ink that reads "M.M. Ryan".

Michael M. Ryan, P.E.
Deputy Secretary
Highway Administration

Review Comments
on the
Draft Guidelines for
Accessible Public Rights-of-Way

Submitted to:
U.S. Architectural and Transportation Barriers
Compliance Board

By:
Pennsylvania Department of Transportation
Michael M. Ryan, P.E.
Deputy Secretary for Highway Administration
400 North Street - 8th Floor
Harrisburg PA 17120-0094

October 25, 2002

**Review Comments on the
Draft Guidelines for Accessible Public Rights-of-Way**

October 25, 2002

Introduction

We certainly appreciate the development of these guidelines since they help to better define accessibility features that were not addressed or had limited application to public rights-of-way issues in the original ADAAG.

We have been asked by FHWA and the American Association of State Highway and Transportation Officials (AASHTO) to forward any of our review comments and concerns to the Board. PENNDOT is a major transportation design/build state agency for highway construction. As a separate state entity concerned with providing accessibility to our highway customers, we are interested in the development of these guidelines.

We are also a major partner in the AASHTO organization and use their design guidelines in many applications. We do agree with a majority of the AASHTO comments and recommendations that have been forwarded to you separately and we are also including our concerns as listed below:

Broad Issues / Concern

1. Our major concerns is the 1106 Section dealing with Accessible Pedestrian Signal Systems. This Section is also of prime concern to AASHTO. The Introduction / Background and Discussion of Provisions of the Draft Guidelines downloaded from the www.access-board.gov internet site certainly helps to provide some guidance on interpreting the various sections. However, these discussions are not part of the guideline requirements and therefore can cause confusion in determining when and to what extent items need to be updated to the new standards especially for locations where existing ADA features are present. We do not interpret the Guidelines to require a complete new statewide installation program of the new features for all locations. New construction installation of the approved ADA features are generally not a problem.
2. We believe that a majority of the new requirements, especially for pedestrian crosswalk signage and signaling systems cannot be readily achieved with our normal alteration programs of Resurfacing, Restoration and Rehabilitation (3R) at existing intersections since any new signing and signaling systems provided can lead to non-consistent levels of accessibility systems operating at one time, at various intersections within the same municipality. This piecemeal arrangement of systems can cause undue confusion to the pedestrian using the signing / signaling systems. We interpret the Guidelines for compliance at existing intersections to be 'pro-rated' based on the extent of alteration work planned as described under "General Scoping". The Board's belief that access should be

required at all crossings equipped with pedestrian signals to ensure a consistent level of accessibility within a pedestrian network is not consistent with the 'pro-rated' concept of alteration work.

3. **Statewide Cost Implications.** We realize that cost concerns are not a justification for non-compliance with ADA features but the extent of items covered in these Guidelines can have far-reaching financial implications to all local municipalities and especially to state transportation agencies charged with statewide programs. Since most municipalities will not be able fund this type of work in a timely fashion, the installation of many new accessibility features can fall to the state level especially where state and local roadways merge. This scenario occurred when the original ADAAG curb ramp requirements were enacted and PENNDOT helped to alleviate the financial strain on local municipality budgets. Other state related highway construction and maintenance 3R projects were cancelled or delayed for several years to concentrate on the curb ramp installations. Unfunded federal mandate programs are not good programs for the organizations charged with compliance of the Guidelines.
4. **Proprietary Issues.** We are concerned that the pedestrian signal industry is not sufficiently developed with the new systems indicated in the Guidelines to allow the use of competitive bidding for all the systems identified in the Guidelines. Both state and federal laws prevent or discourage the use of sole source or proprietary manufacturers for federal or state funded construction projects.
5. We agree with AASHTO's concerns on the use and definition of highway terms provided in the Guidelines and desire that the terminology be consistent with normal highway usage.

The use of AASHTO manuals and the Manual of Uniform Traffic Control Devices (MUTCD, 2000) should be consulted for consistency in terminology definitions and usage.

Exception: We do not agree with AASHTO's desire to eliminate the terms 'technically infeasible' and 'maximum extent feasible' from the Guidelines. We believe that these are helpful terms in utilizing the guidelines in difficult design/construction locations.

Technical Concerns:

1102.10 Stairs --

Stair treads to have a 2-inch strip of color contrasting with the tread and riser, the full width of the front edge of each tread.

Concern -- The length of the tread can greatly affect whether the 2-inch color strip is visually discernable for each step. We have experienced problems where narrow step treads with a colored edge strip cannot be visually discerned when walking down the

Concern – The length of the tread can greatly affect whether the 2-inch color strip is visually discernable for each step. We have experienced problems where narrow step treads with a colored edge strip cannot be visually discerned when walking down the steps, since the colored edge visually blends together causing confusion and uncertain foot placement.

1103.3 Minimum Clear Width –

The minimum clear width of a pedestrian access route shall be 48 inches, exclusive of the width of the curb.

Concern – Using the wider accessible route dimensions for alteration projects can create an extensive sidewalk patchwork of various width PAR's within a given community.

1103.4 Grade –

The grade of the pedestrian access route within a sidewalk shall not exceed the grade established for the adjacent roadway ...

Concern – Sidewalks paralleling roadways in hilly terrain may not meet the desired grade guidelines therefore making them ramps. Making the sidewalk a ramp and requiring ramp provisions of handrail on each side, edge protection and intermediate level landings are often impossible to construct along steep roadways if the sidewalk is adjacent to the curb and especially within limited R/W widths. This is even difficult to design for new construction projects. The less than 1:20 route slope limit for a parallel sidewalk is unrealistic in many hilly terrain locations. The handrail requirement for a ramp brings an unsafe element to vehicles if a car leaves the roadway and jumps the curb.

1103.8 Changes in Level –

Changes in level shall comply with 303.

Concern – We agree with AASHTO's comment that the ¼-inch change in level is very unrealistic to maintain especially in older existing sidewalks.

1105.2.1 Crosswalks – Width –

Marked crosswalks shall be 96 inches wide minimum.

Concern – We agree with AASHTO's comment that the extra 24 inch width requirement beyond the MUTCD standard of 72 inches is not necessary and excessive in most locations.

Recommendation - This guideline could be adjusted so that different widths are available to accommodate projected increased pedestrian usage in larger cities.

1105.2.2 Crosswalks – Cross Slope -

The cross slope shall be 1:48 maximum measured perpendicular to the direction of pedestrian travel.

Concern – Reducing the street profile grades to 1:48 at intersection crosswalks will lead to 'tabled areas' being created that are very difficult to form in steep or uneven terrain especially at existing intersections. We agree with AASHTO's concerns for this guideline.

1105.2.3 Crosswalk Running Slope –

Concern – We agree with AASHTO’s comment that this guideline cannot be achieved in some super-elevated sections of roadway.

1105.3 Pedestrian Signal Phase Timing -

All pedestrian signal phase timing shall be calculated using a pedestrian walk speed of 3.0 ft/sec maximum.

Concern – This guideline indicates all signals shall be... If these guidelines are to include alteration projects, there will be various timed sequences in place statewide that can create pedestrian confusion to intersections with one time sequence in one location and have a different time sequence further down the block. We also agree with AASHTO’s assessment of this guideline.

1105.5 Pedestrian Overpasses and Underpasses -

1105.5.2 The running slope shall not exceed 1:20 maximum.

Concern – The PAR’s can become excessively long at approaches and require extra physical effort to negotiate the longer distances. The 1:20 exception is too flat to effectively use in these locations for the heights to be overcome, especially at existing locations.

1105.5.3 Approach

... where the rise of a ramped approach exceeds 60 inches, an elevator ... shall be provided.

Concern – Elevator usage at these areas is generally infeasible to provide especially in suburban or rural locations. Their initial installation cost and long term maintenance cost cannot be justified in most places. We also agree with AASHTO’s assessment of this guideline.

1105.6 Roundabouts -

Concern - We agree with AASHTO’s assessment of this guideline.

1105.7 Turn Lanes at Intersections –

... crosswalks are provided at right and left turn slip lanes, pedestrian activated traffic signal ... shall be provided.

Concern – This provision can lead to various levels of signal systems being provided state wide. We also agree with AASHTO’s assessment of this guideline.

1106 Accessible Pedestrian Signal Systems –

Concern – We agree with AASHTO’s assessment of these guidelines for the entire Section.

1111.3 Location of Alternate Circulation Path –

Concern – We agree with AASHTO’s assessment of this guideline.