## DEPARTMENT OF TRANSPORTATION

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October 28, 2002

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

Dear Sirs:

The California Department of Transportation (Department) wishes to thank the Architectural and Transportation Barriers Compliance Board for the opportunity to comment on the Draft Guidelines for Accessible Public Rights-of-Way. The Department fully supports the recommendations of the American Association of State Highway and Transportation Officials (AASHTO), which were approved on October 14, 2002. The comments enclosed underscore a number of these recommendations and provide additional comments we felt needed further consideration by the Board.

As a general comment, the Department would like to see a distinction in the final rules between new construction standards and alteration (or retrofit) standards (see enclosed comments for some specific examples). The Department recognizes the value of some of the proposed standards for new construction, but to require these same standards for retrofit conditions would prove costly and could divert limited funds from higher priority needs to locations where improvement would provide a marginal benefit. We recommend retrofit standards be developed that provide flexibility to transportation agencies to maximize benefits to all of the traveling public.

If you have any questions, please call Tim Craggs, Division of Design, at (916) 653-1027.

Sincerely,

BRENT FELKER Chief Engineer

Enclosure