



South Carolina
Department of Transportation

October 25, 2002

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

Subject: AASHTO Comments on Proposed ADA Guidelines

Dear Members of the Compliance Board:

Reference is made to the "Comments and Recommendations on the Draft Guidelines for Accessible Public Rights-of-Way" dated October 2002, submitted to you by the AASHTO Board of Directors. The South Carolina Department of Transportation (SCDOT) offers strong support of these comments and recommendations. There are several areas that need to be emphasized.

The cost associated with meeting the proposed ADA guidelines will increase the project cost thereby reducing the funding for future projects. SCDOT urges the Compliance Board to demonstrate the absolute need of implementing these ADA guidelines or provide rational guidance in their application. We desire to provide equitable access when and where the need exist. Reasonable tolerances of all criteria should be discussed in your final publication. This will provide the transportation designer knowledgeable variances where right-of-way or other limitations exist.

Other areas we would like to emphasize are addressed by Section and shown below:

Section 1102.11 Handrails should be expanded by adding the following statement: "Pedestrian rails on bridges shall comply with AASHTO Bridge Design Specifications (Latest Edition).

Section 1103.3 Clear Width should provide an absolute minimum width at a single point when unable to provide the full width throughout the pedestrian access route. We recommend that a width of 32 inches at a single point occurring no closer than 50 feet apart be added to this section.

Section 1104.3.1 Width is recommended to be changed from 48 inches to 36 inches as in previous draft guidelines. Typically, sidewalks will be four to eight feet wide, but it is not reasonable to mandate a width greater than what is absolutely necessary.

Section 1108.1 Detachable Warning Surfaces needs to be limited in its application to approaches to rail systems and other highly potentially dangerous areas. The use of these domes has potential to be high cost for installation, materials and litigation. As public access routes



reaches higher volumes of aging pedestrians, it is a concern that domes or some irregularity on the surface may cause unsteadiness, increasing the potential for falling.

Section 1108.1.3 Contrast is recommended to be removed due to extraordinarily high cost due to the additional time and labor involved. The benefit versus the cost is questionable.

Section 1108.2.2 Rail Crossings needs to add the dimensions of the vehicle dynamic envelope.

SCDOT appreciates the opportunity to participate in this review process. Compliance with "ADA Guidelines" as presented has significant cost, time and manpower implications to our statewide operation. Revisions to these guidelines in terms of reasonable conformity and allowable dimensional variances would assist us in meeting these requirements more readily. Please advise if you have any questions concerning the above.

Sincerely,


D. H. Freeman
State Highway Engineer

DHF:afg

cc:

Jim McDonnell, P. E., Associate Program Dir. of Engrg.

File:PC/ESE

CTS No. 10244