

TECHNICAL BULLETIN

TO: FILE

SUBJECT: Curb Ramp Technical Infeasibility

Approved By: 
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Effective Date: **January 23, 2026**

Purpose

To inform city staff of the City of Oakland’s procedure for documenting technical infeasibility specific to curb ramp design. Technical infeasibility is defined by the Public Right Of Way Accessibility Guidelines (PROWAG) as a design that has little likelihood of being accomplished because existing physical or site constraints prohibit modification or addition of elements, spaces, or features that are in full and strict compliance with the minimum requirements.

Policy

Curb ramp design considerations must follow specific guidelines to ensure accessibility and safety for all users. New curb ramps constructed within the City of Oakland Public Right of Way shall conform to the latest City of Oakland Standard (“[Standard Curb Ramp Plans](#)”).

This bulletin reflects requirements from the California Building Standards Code (Cal. Code Regs., Title 24) and the Americans with Disabilities Act (ADA). Under CBC §11B-202.3, compliance must be achieved to the maximum extent feasible, and equivalent facilitation (§11B-103) may be used if it provides equal or greater access. Similarly, ADA Title II regulations at 28 C.F.R. §35.151(b) require that alterations provide accessibility to the maximum extent feasible (MEF), while ensuring meaningful access under 28 C.F.R. §35.150. Together, these standards establish the legal framework for evaluating and documenting technical infeasibility in curb ramp construction.

The following key principles are to be considered during curb ramp design and construction.

- A. **Maximum Extent Feasible (MEF):** Even if technical infeasibility is found, all elements must be designed and constructed to the maximum extent feasible in compliance with accessibility standards.
- B. **Equivalent Facilitation:** CBC §11B-103 and ADA Title II allow for alternative designs that provide substantially equivalent or greater access. Engineers and designers should document how the alternative design achieves meaningful access.
- C. **Meaningful Access:** Facilities must provide disabled individuals with meaningful—not minimal—access to public rights-of-way.

Procedure

Every reasonable effort should be made to design and build “Case A” directional ramps serving each direction of pedestrian travel. In most cases this means that two ramps are installed per corner, one per crosswalk. If existing site conditions precludes a double “Case A” curb ramp layout, it is acceptable to use the remaining layout designs presented in the Standard Curb Ramp Plans. Curb ramp layout sheets in the Standard Curb Ramp Plans are ordered from highest to lowest allowable design. The highest ordered layout that fits within site constraints shall be used.

In recognition that in some instances it may be technically infeasible to comply with all requirements in the Standard Curb Ramp Plans, this bulletin provides guidance for documenting and receiving approval through technical infeasibility determination (“TID”).

On occasion where substantial existing constraints limit the ability to construct a curb ramp in accordance with the Standard Curb Ramp Plans, and after all design alternatives have been deemed infeasible, the Engineer of Record (California Licensed Professional Engineer) can appropriately document and submit a request for a TID.

Examples of substantial existing constraints resulting in a TID include, but are not limited to, sub-surface basements directly below the ramp area, large utility pull boxes or vaults (larger than standard number 5 PG&E box) in proposed areas of change in plane, catch basin located in proposed ramp area, utility pole or fire hydrant conflicts, narrow sidewalk (less than 5 feet in width), building entrance or driveway conflicts, excessive running slope, excessive cross slope, and large trees. In the circumstances involving existing utility conflicts, the utility provider must be contacted to determine if relocation is feasible and their response must be documented.

The following are examples of circumstances that would not be considered valid reasons to make a TI determination: planned new utilities in the area of a Standard Curb Ramp Design, extra cost to design and implement an alternative design, or existence of other non-compliant ramps in the area. It is the responsibility of the engineer of record to ensure that curb ramps designs meet accessibility requirements and, when necessary, prepare a TI determination following the procedure below.

Documentation for TID

To submit a request for a TID before a project enters construction, the project Engineer of Record shall prepare and submit a Curb Ramp - Technical Infeasibility inspection work order (TI work order) in the City’s asset management system (Cityworks), associated with the appropriate curb ramp asset. (See *PROW Construction Manual: Curb Ramp Technical Feasibility Form* for detailed instructions on accessing and completing the form.) The TI work order must be completely filled out and convey the following:

1. The ramp location
2. Detailed design constraints
3. Design alternatives considered

4. Proposed design, and
5. Documentation of correspondence with utility companies
6. Exhibits and/or photos
7. Stamp of Engineer of Record; and
8. Any other information that may help in justifying a variance.

The TI work order is submitted through Cityworks to the Engineer of Record for review and the ADA Programs Division Manager or City Engineer for approval and sign-off. The project engineer must stamp the TID and certifies accuracy of design analysis and alternative explored. The ADA Programs Division Manager and City Engineer ensure ADA compliance and access obligations are addressed. TID documentation (copies of files above and PDF of the TI work order) shall also be saved in the project folder.

In cases where any feature of a curb ramp does not meet the requirements in the Standard Plans or the construction plans, the deviations must be documented in the following manner:

1. If a non-compliant curb ramp was originally approved as a TID but can be constructed to comply with Standard Curb Ramp Plans by making field adjustments, it is acceptable to document the change in the as-built record drawings. Construction inspector will complete a curb ramp inspection and the ramp will be recorded as compliant, superseding the TID.
2. If a curb ramp was designed to be compliant with the Standard Plans but due to unforeseen circumstances cannot be constructed per the design or Curb Ramp Standard Plans, any proposed design change must be reviewed by the Engineer of Record, who shall submit a TI work order request, as detailed above.

Additional Information

Existing ramps that do not comply with City standards but have been recently built to comply to the maximum extent feasible and are supported by a TID, are not required to be removed and replaced if no improvement can be made to the existing ramp.

The TID remains active until re-evaluation is triggered by redevelopment, capital improvements, permits, or removal of constraints. The public right-of-way may include curb ramps that have been recently re-built to improve their level of compliance with the Curb Ramp Standard Plans yet are not fully compliant and do not have an associated TID. These ramps shall be analyzed to determine if further improvements are feasible or a TI determination is needed, following the policies and process described earlier in this document. All documentation related to an existing or new TID determination shall be saved in the project folder.

Resources and References

1. City of Oakland Standard Details for Public Works Construction
<https://www.oaklandca.gov/resources/standard-details-for-public-works-construction>
2. City of Oakland Standard Curb Ramp Plans

<https://cao-94612.s3.us-west-2.amazonaws.com/resources/Oakland-Curb-Ramp-Standard-Plans.pdf>

3. American With Disability Act Standards for Accessible Design
<https://www.ada.gov/law-and-regs/design-standards/>
4. Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way Alterations
<https://www.access-board.gov/prowag/complete.html#r202-alterations>
5. California Building Standards Code (Cal. Code Regs., Title 24) 11B-202.3 – Alterations & Technical Infeasibility
<https://www.dgs.ca.gov/bsc/codes>

Attachments:

- [Curb Ramp Technical Infeasibility Work Order Form](#)