



## DPW Order No: 184350

ESTABLISHING REGULATIONS AND GUIDELINES FOR THE EVALUATION AND CONSTRUCTION OF NEW CURB RAMPS OR RECONSTRUCTION/UPGRADE OF EXISTING CURB RAMPS AND ADDITIONAL PEDESTRIAN SAFETY IMPROVEMENTS WHEN STREET EXCAVATIONS OCCUR AT ANGULAR RETURNS OR IN THE CROSSWALK.

Edwin M. Lee  
Mayor

Mohammed Nuru  
Director

San Francisco Public Works  
1 Dr. Carlton B. Goodlett Pl.  
Room 348  
San Francisco, CA 94102  
tel 415-554-6920

[sfpublicworks.org](http://sfpublicworks.org)  
[facebook.com/sfpublicworks](https://facebook.com/sfpublicworks)  
[twitter.com/sfpublicworks](https://twitter.com/sfpublicworks)  
[twitter.com/mrcleansf](https://twitter.com/mrcleansf)

This DPW Order Supersedes DPW Order No. 182,003: ESTABLISHING REGULATIONS AND GUIDELINES FOR THE CONSTRUCTION OF NEW CURB RAMPS OR RECONSTRUCTION/UPGRADE OF EXISTING CURB RAMPS AT ANGULAR RETURNS WHEN STREET EXCAVATION OCCURS AT THE ANGULAR RETURNS OR IN THE CROSSWALK.

### I. PURPOSE:

- A. The Federal Americans with Disabilities Act (ADA), and the 2010 ADA Standards (2010 ADAS) require curb ramp upgrades/replacements when there is new construction or alteration of the roadway adjacent to the intersection. Public Works policy requires that upon performing any excavation within a marked or unmarked crosswalk within the public right-of-way, all affected curb ramps shall be evaluated and/or reconstructed/upgraded per current DPW Standards. Section 98.1 of the San Francisco Administrative Code requires that, in accordance with the Better Streets Plan, all City departments shall prioritize pedestrian safety, enjoyment, and comfort when considering an approval or decision concerning any public and private project that impacts or is adjacent to a publicly-accessible right-of-way. This Public Works Order provides details on said guidelines.
- B. DPW has both anecdotal and actual information indicating that excavators in the public right-of-way were modifying the scope and physical location of their projects to avoid the curb ramp reconstruction requirements in DPW Order No. 179,254 (2011). DPW believes that this Order properly balances competing policy needs of private and public sector excavators and will enhance and support ADA compliance when there is new construction or alteration of the roadway adjacent to the intersection or in angular curb returns.

### II. DEFINITIONS:

- A. **Crosswalk.** A crosswalk includes any marked or unmarked pedestrian crossing between two (2) angular returns. The width of an unmarked crosswalk shall be defined as the arc of an angular return.
- B. A **crosswalk** also includes an MTA approved mid-block crosswalk; e.g. between public office buildings, schools, hospitals, and any other facility that serves the public.
- C. **Angular return.** An angular return is the portion of the sidewalk at an intersection, measured as a 90 degree arc from the corner of the adjacent private property to the constructed curb line.
- D. **Technically infeasible.** Per section 106.5 of the 2010 ADAS technically infeasible means, with respect to an alteration of a facility, that it has little likelihood of being accomplished because "existing physical or site constraints prohibit modification or addition of elements, spaces, or features which are in full and strict compliance with the minimum requirements for new construction and which are necessary to provide accessibility."

### III. GUIDELINES Triggering Curb Ramp Construction:

- A. **Excavation within the Crosswalk** - Upon performing any excavation work within a crosswalk, an evaluation of the angular returns at each end of the affected crosswalk shall be conducted. If curb ramps do not exist or existing curb ramps are not

constructed per current DPW Standards, then barring technical infeasibility, the excavator shall construct curb ramps necessary to complete the path of travel across the affected crosswalk. See Figure 1. Curb ramps shall be constructed to current DPW Standards (see [DPW Standard Plans](#) for current curb ramp design).

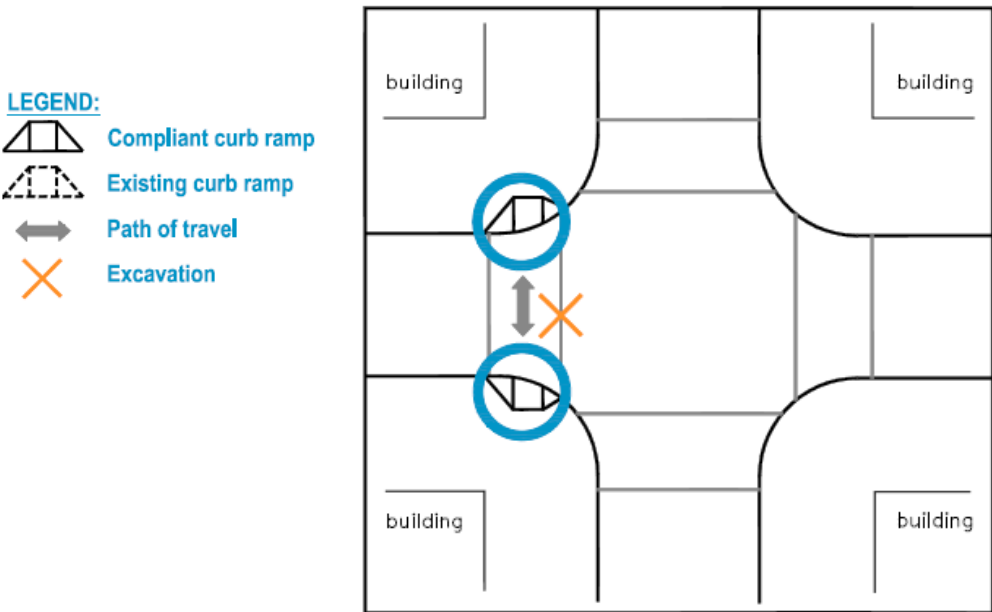
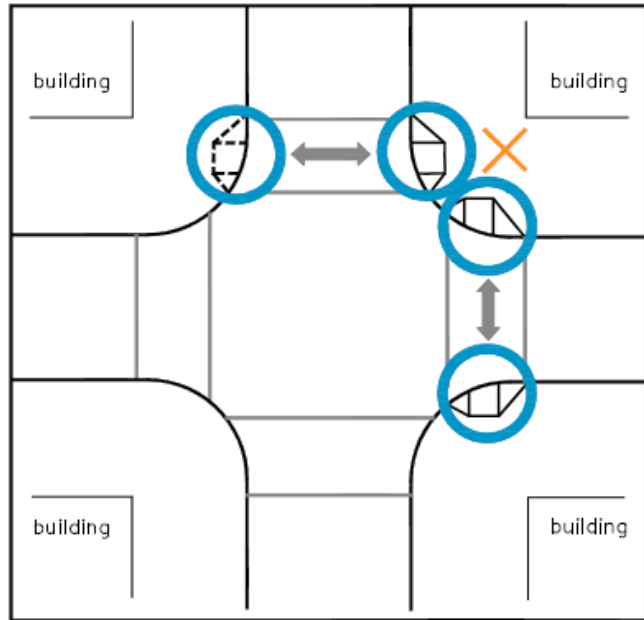
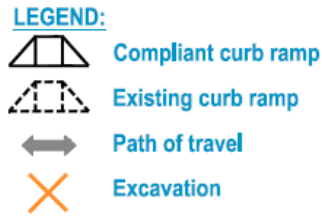


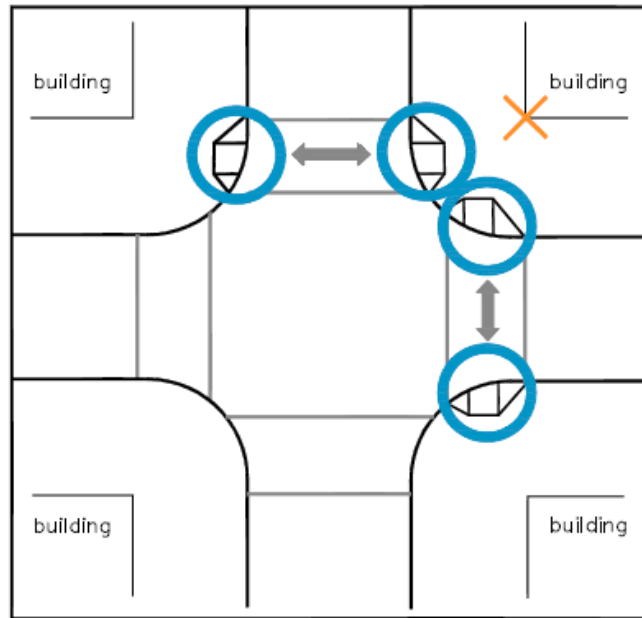
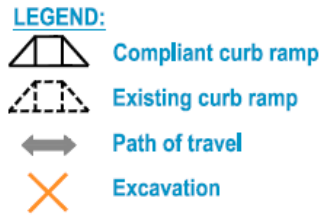
Figure 1:  
Excavation within the Crosswalk

B. **Excavation at the Angular Return** - Any excavation within the angular return of any street segment shall require an evaluation of the angular return. If curb ramps do not exist or existing curb ramps are not constructed to current DPW Standards, then barring technical infeasibility, the excavator shall construct curb ramps. In addition, the excavator shall evaluate the two connecting angular returns to complete the paths of travel. If connecting curb ramps exist on the connecting angular returns, then the excavator is not required to construct connecting curb ramps. If connecting curb ramps do not exist on the connecting angular returns, then barring technical infeasibility, the excavator shall construct connecting curb ramps necessary to complete the paths of travel across the crosswalk See Figure 2. Curb ramps shall be constructed to current DPW Standards (see [DPW Standard Plans](#) for current curb ramp design).



**Figure 2:**  
Excavation at the Angular Return

- C. **Building Construction Affecting the Angular Return** - Any building construction that physically affects an angular return shall require an evaluation of the angular return. If curb ramps do not exist or existing curb ramps are not constructed to current DPW Standards, then barring technical infeasibility, the developer/property owner shall construct curb ramps . In addition, the developer/property owner shall also be required to evaluate the connecting angular returns to complete the paths of travel. If a compliant curb ramp does not exist on the connecting angular return, then barring technical infeasibility, the developer/property owner shall construct a compliant curb ramp necessary to complete the paths of travel and restripe the crosswalks. See Figure 3. Curb ramps shall be constructed to current DPW Standards (see [DPW Standard Plans](#) for current curb ramp design).



**Figure 3:  
Building Construction Affecting  
the Angular Return**

**D. Coordination with the City's ADA Transition Plan for Curb Ramp Construction -**

When utility excavation or building construction work under III A, B, or C above triggers the construction of a single curb ramp at any angular return as shown in Figures 1, 2, or 3 then the excavator or the developer/property owner shall coordinate their design to allow the future construction of the second curb ramp at each return. The City will seek additional funding through the City's ADA Transition Plan to complete the path of travel for the entire intersection.

**IV. GUIDELINES Triggering Pedestrian Safety Evaluation:**

**A. Excavation within the Crosswalk, Excavation at the Angular Return, and Building Construction Touching the Angular Return –** For any angular return where the City performs a curb ramp evaluation and determines that curb ramp construction is necessary, the City may also evaluate the intersection to assess the need for upgrades to improve pedestrian safety.

**V. EXCEPTIONS:**

**A.** In the evaluation of the angular returns, a request for exception to the installation of curb ramps requires a detailed identification of the existing conditions that could cause the design and construction of a complying curb ramp to be technically infeasible. In locations where a fully complying curb ramp is infeasible, evaluation will be made to determine if a non-compliant accessibility improvement is possible. The request for exception based upon technical infeasibility shall be in writing to the Director Public Works, identifying the nature of the infeasibility and evaluating construction alternatives. The Director of Public Works or his/her designee shall review this request for exception and provide written authorization or denial to the requested exception.

**B.** Replacing surface facilities in place, within its existing footprint, as part of routine maintenance and repair are exempt from curb ramp construction.

**C.** A declared emergency excavation that results in 1000 square feet or less of excavation. An emergency excavation is defined in the Public Works Code Sec.2.4.22 Emergency Excavation.

**D.** Excavation that results in 50 square feet or less of excavation.

VI. IMPLEMENTATION:

A. The Order establishes an effective date of January 1, 2016. All permits issued after this date shall comply with this DPW Order No. 184,350 for the evaluation, construction and upgrade of curb ramps and corresponding pedestrian safety improvements at angular returns. Permits issued before January 1, 2016 are subject to Public Works Order No. 182,003.

12/22/2015

X 

---

Sanguinetti, Jerry  
Bureau Manager  
Signed by: Sanguinetti, Jerry

12/22/2015

X 

---

Sweiss, Fuad  
Deputy Director and City Engineer  
Signed by: Sweiss, Fuad

12/23/2015

X Mohammed Nuru

---

Nuru, Mohammed  
Director, DPW  
Signed by: Nuru, Mohammed