

ADA Compliance & Hardship Worksheet

11B-202.4 Path of Travel Requirements in Alterations, Additions and Structural Repairs

**INFORMATION
GUIDELINE**

2026

B

Path of Travel Requirements

The provisions of Section 11B-202.4 Exception 8 apply to existing buildings or facilities used as public buildings, public accommodations, commercial buildings, or public housing. When these buildings or facilities undergo alterations, structural repairs, or additions, an accessible path of travel must be provided to the specific area of construction.

When the adjusted construction cost of alterations, structural repairs, or additions to existing buildings and facilities **EXCEEDS** a valuation threshold of **\$209,208.00 ****, an accessible path of travel to the specific area of alteration or additional shall be provided. All elements along the path of travel shall meet full compliance with the current edition of the California Building Code.

When the adjusted construction cost of alterations, structural repairs, or additions to existing buildings and facilities **DOES NOT** exceed a valuation threshold of \$209,208.00 **, the cost of compliance with Section 11B-202.4 of the California Building Code shall be limited to 20% of the adjusted construction cost of alterations, structural repairs or additions.

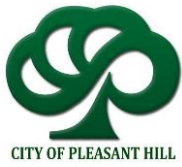
If the alteration **DOES NOT** exceed a valuation threshold of \$209,208.00 **, please complete the attached worksheet, and prepare a site and floor plan of the existing and proposed accessibility improvements and submit them to the Building and Safety Division as part of your plan review. The worksheet and plans must be signed and approved prior to plan check approval and permit issuance. The worksheet and plans must be attached and made part of the Building Plans for reference.

In choosing which accessible elements to provide, priority should be given to those elements that will provide the greatest access in the following order:

1. An accessible entrance
2. An accessible route to the area of alteration, structural repair, or addition (see definition of accessible route Section 202 & 11B-206.2.1 for more information on accessible routes and site arrival points)
3. At least one accessible restroom for each sex serving the area of alteration, structural repair or addition
4. Accessible telephones, if provided, serving the area of alteration, structural repair, or addition
5. Accessible drinking fountains, if provided, serving the area of alteration, structural repair, or addition
6. When possible, additional accessible elements such as additional parking, storage, signs and alarms

Informational Note: Barrier removal is an ongoing obligation for ADA and this application does not exempt the applicant of any obligations to removing barriers in a reasonable time frame and by signing this report you understand that this 20% is for this addition/alteration alone.

** Valuation threshold based on Department of State Architect Valuation Threshold effective January 19, 2026



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Documents cannot be restricted by digital signatures or otherwise.

A. Project Information

Submittal: A completed ADA Compliance and Hardship Worksheet along with any required attachments must be included. **Request:** CBC 11B-202.4 Exception 8 unreasonable hardship which will not limit or absolve liability under the Americans with Disability Act.

Accessible Path of Travel Requirements in Alterations, Additions and Structural Repairs: When alterations or additions are made to existing buildings or facilities, an accessible path of travel to the specific area of alteration or addition shall be provided. When the adjusted construction cost, as defined, exceeds the current valuation threshold, as defined, and the enforcing agency determines the cost of compliance with Section 11B-202.4 is an unreasonable hardship, as defined, full compliance with Section 11B-202.4 shall not be required.

When alterations, structural repairs or additions are made to existing buildings or facilities, the term "path of travel" also includes the toilet and bathing facilities, telephones, drinking fountains and signs serving the area of work.

Brief Project

Description: _____

Project Address: _____

Permit No.: _____

APN: _____

Property Owner or Authorized Agent

Name/Signature: _____

Date: _____

Design Professional

Name/Signature: _____

License No.: _____

Date: _____

B. Analysis

B1: DSA Valuation Threshold. Enter the [DSA valuation threshold](#) (see link). (\$209,208.00 for 2026)
If B4 exceeds the threshold, full compliance is required unless determined an unreasonable hardship.

\$

B2: Projects During the Last Three Years.

What is the total spent on construction for permitted projects along the same Path of Travel over the last three years at this site? *Attach a detailed estimate.*

\$

B3: Proposed Project Construction Cost.

What is the proposed cost of construction under this permit?

Exclude the cost of accessibility upgrades as allowed by CBC 11B-202.4. Attach a detailed estimate.

\$

B4: Total Valuation Amount. (B2 + B3)

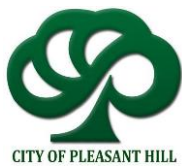
The adjusted construction cost of alterations, structural repairs or additions shall not include the cost of alterations to path of travel elements required to comply with Section 11B-202.4.

\$

B5: Required 20% Minimum for Accessible Elements. (B4 x 20%)

In no case shall the cost of compliance be less than 20 percent of the adjusted construction cost of alterations, structural repairs or additions.

\$



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C. Accessible Elements Along the Path of Travel

Priority should be given to those elements that will provide the greatest access in the order shown below.

Path of Travel Element	Accessible now?	Will it be accessible?	Estimated Cost?
C1. Entrance	☐ No ☐ Yes	☐ No ☐ Yes	\$
C2. Route to the altered area	☐ No ☐ Yes	☐ No ☐ Yes	\$
C3. At least one accessible restroom for each sex or one accessible unisex (single-user or family) restroom	☐ No ☐ Yes	☐ No ☐ Yes	\$
C4. Telephones	☐ No ☐ Yes	☐ No ☐ Yes	\$
C5. Drinking Fountains	☐ No ☐ Yes	☐ No ☐ Yes	\$
C6. Parking, signs, storage, alarms, etc.	☐ No ☐ Yes	☐ No ☐ Yes	\$
C7. Total Cost of Proposed Accessibility Improvements? (Sum C1 through C6) <i>Attach a detailed estimate.</i>			\$
C8. Total Cost Needed to Achieve Full Compliance? <i>Attach a detailed estimate.</i>			\$

D. Unreasonable Hardship or Technically Infeasible *Describe if applicable.*

- Address all the listed criteria for the selected option in your request for the unreasonable hardship.
- Place emphasis on the elements that provide the greatest improvements to disabled access.
- A disproportionate cost must be established to qualify as an unreasonable hardship.
- Details of the finding that full compliance is technically infeasible shall be maintained by the enforcing agency.

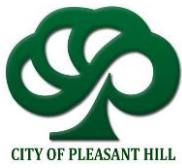
D1. Describe "unreasonable hardship" element and the equivalent facilitation or compliance to the greatest extent possible.

Path of Travel (11B-202.4, Exception 8)

Outdoor Developed Areas (11B-246.1, Exception 2)

Walking Surfaces (11B-403.5.1, Exception 3)

An overall evaluation is based on: The cost of providing access. The cost of all construction contemplated. The impact of proposed improvements on financial feasibility of the project. The nature of the accessibility which would be gained or lost. The nature of the use of the facility under construction and its availability to persons with disabilities.



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D. Unreasonable Hardship or Technically Infeasible *Describe if applicable.*

D2. Describe "technically infeasible" element per CBC 11B-202.3, Exception 2.

An alteration of a building or a facility, that has little likelihood of being accomplished because the existing structural conditions require the removal or alteration of a load-bearing member that is an essential part of the structural frame, or because other 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 for new construction and which are necessary to provide accessibility.

E. Determination *Department use only.*

☐

Request Acknowledged. The adjusted construction cost is less than or equal to the valuation threshold. The elements noted on this application shall comply with CBC 11B and shown on the construction plans.

☐

Request Granted. The adjusted construction cost exceeds the valuation threshold. The cost of compliance is determined to be an unreasonable hardship. The elements noted on this application shall comply with CBC 11B and shown on the construction plans.

☐

Request Denied. The adjusted construction cost exceeds the valuation threshold. The cost of compliance is determined NOT to be an unreasonable hardship. The elements noted on this application shall comply with CBC 11B and shown on the construction plans.

Building Official

Name or Initial: _____ Date: _____