MEF Design Reviews
Policy, Procedures, Application, & Sample Documentation

March 2015
This policy sets forth the requirements for the documentation, review, and approval of “maximum extent feasible” (MEF) design decisions for the occasional case where a pedestrian facility in the public right-of-way cannot be altered to comply fully with accessibility standards. Requests for MEF design reviews shall not be approved where there is an attempt to justify acceptance of pedestrian facilities that were improperly designed or constructed. The “maximum extent feasible” that can be achieved must be determined and approved in accordance with this policy, and the following accessibility standards and guidelines:


The preceding accessibility standards and guidelines are subject to change at any time as they are revised and updated by the agencies responsible for issuing and enforcing them.

1. **Background**

According to the WSDOT Design Manual Chapter 1510:

- **New construction** projects address the construction of a new roadway, interchange, or other transportation facility where none existed before.”

- An alteration project is “[a]ny project that affects or could affect the usability of a pedestrian facility [. . . ].”

For alterations the Code of Federal Regulations (28 CFR 35.151(b)) states:

“(1) Each facility or part of a facility altered by, on behalf of, or for the use of a public entity in a manner that affects or could affect the usability of the facility or part of the facility shall, to the maximum extent feasible,
be altered in such a manner that the altered portion of the facility is readily accessible to and usable by individuals with disabilities, if the alteration was commenced after January 26, 1992.”

“Maximum extent feasible” is defined in ADA Title III (28 CFR 36.402(c)):

“The phrase ‘to the maximum extent feasible,’ as used in this section, applies to the occasional case where the nature of an existing facility makes it virtually impossible to comply fully with applicable accessibility standards through a planned alteration. In these circumstances, the alteration shall provide the maximum physical accessibility feasible. Any altered features of the facility that can be made accessible shall be made accessible. If providing accessibility in conformance with this section to individuals with certain disabilities (e.g., those who use wheelchairs) would not be feasible, the facility shall be made accessible to persons with other types of disabilities (e.g., those who use crutches, those who have impaired vision or hearing, or those who have other impairments).”

2. Responsibility for Compliance

Design Engineers or Project Managers who are responsible for designing pedestrian facilities to be altered in the public right-of-way shall be responsible for:

A. Understanding and complying with the accessibility standards and guidelines identified in this policy.

B. Identifying during the design phase the pedestrian facilities located in the public right-of-way within the scope of their projects that cannot be altered to fully comply with the applicable accessibility standards due to existing conditions, and designing those facilities to comply with the standards to the maximum extent feasible.

C. Submitting an MEF Design Review Application (MEF Application) with supporting documents (MEF Documentation) to the County Traffic Engineer, or his/her designee, and obtaining approval for the pedestrian facilities that cannot be altered to fully comply with the applicable accessibility standards before final construction plans are approved.

D. Ensuring that Construction Engineers or Inspectors receive copies of the approved MEF Applications and Documentation and are aware of the pedestrian facilities that will not fully comply with applicable standards.

E. Obtaining approval from the County Traffic Engineer, or his/her designee, for field changes to approved pedestrian facility designs due to unforeseen field conditions before final inspection and project close-out.

Construction Engineers or Inspectors who are responsible for overseeing the alteration of pedestrian facilities located in the public right-of-way shall primarily be responsible for:

A. Understanding and complying with the accessibility standards and guidelines identified in this policy.

B. Ensuring that pedestrian facilities altered in the public right-of-way are altered according to approved plans and notifying the Design Engineer or Project Manager when unforeseen field conditions necessitate changes to the approved plans.

3. MEF Documentation Requirements

A. Engineers or Project Managers should submit one MEF Application per project (to the extent practicable). The MEF Documentation can include multiple pedestrian facilities to be reviewed for the same project.
B. MEF Documentation must be stamped and signed by a Professional Engineer licensed to practice in the State of Washington.

C. MEF Documentation shall provide sufficient detail to clearly identify the location of each pedestrian facility to be evaluated, and:
   i. Reference the applicable accessibility standard for each pedestrian facility where standards cannot be fully complied with;
   ii. Describe the circumstances that make it virtually impossible to achieve full compliance;
   iii. Document design alternatives that were considered in an attempt to comply with standards;
   iv. Describe how accessibility standards are met to the “maximum extent feasible”; and,
   v. Attach drawings, engineering calculations, or other data to substantiate the request.

4. **MEF Design Review and Approval**

MEF Applications and Documentation shall be submitted to the County Traffic Engineer or his/her designee. The County Traffic Engineer, or his/her designee, shall approve, approve with conditions, or disapprove each MEF Application based on the MEF Documentation submitted for review. Approval shall be obtained before plans are approved for construction. Program Planning will archive approved MEF Applications and Documentation and update the County’s pedestrian facility inventory database and maps.

A change to one or more elements of an approved pedestrian facility design due to unforeseen field conditions requires the approval of the County Traffic Engineer, or his/her designee, if the one or both of the following criteria are met:

A. A change will cause one or more elements of a pedestrian facility to be non-compliant with the applicable accessibility standards when the element, or elements, would have otherwise been compliant if altered according to the approved plans.

B. A change will cause a reduction in the required accessibility of one or more elements of a pedestrian facility beyond what was already approved during the MEF Design Review process.

Approval is not required for changes that increase the accessibility of one or more elements of a pedestrian facility beyond what was already approved during the MEF Design Review process. Approved MEF Applications and Documentation shall be revised and resubmitted to the County Traffic Engineer, or his/her designee, and approval obtained for field adjusted designs before final inspection and project close.

Pedestrian facilities altered in the public right-of-way for which MEF Applications and Documentation have not been approved shall be altered to fully comply with the applicable accessibility standards and guidelines. Pedestrian facilities in the public right-of-way for which MEF Applications and Documentation have been approved shall only be altered as approved.

5. **Appeals Process**

The decision of the County Traffic Engineer, or his/her designee, may be appealed to the County Engineer. Requests shall be made in writing to the County Traffic Engineer, or his/her designee, and include (1) the original MEF Application and Documentation provided to the County Traffic Engineer, or his/her designee, and (2) a statement of the engineering reasons why the decision should be reconsidered. The County Traffic Engineer, or his/her designee, shall then forward the request, MEF Application and Documentation to the County Engineer for review. The County Engineer will return his/her decision to the Engineer or Project Manager within 14 calendar days.
## PROCEDURE-4400 REVIEW AND DOCUMENTATION OF PEDESTRIAN FACILITIES ALTERED IN THE PUBLIC RIGHT-OF-WAY TO THE MAXIMUM EXTENT FEASIBLE

<table>
<thead>
<tr>
<th>Action By:</th>
<th>Action:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Design Engineer or Project Manager</td>
<td>1. Understand and comply with the accessibility standards, responsibilities, and documentation requirements identified in Policy - 4400.</td>
</tr>
<tr>
<td></td>
<td>2. Identify pedestrian facilities located in the public right-of-way within the scope of the project that cannot be altered to fully comply with the applicable accessibility standards due to existing conditions, and prepare designs for those facilities that will comply with the standards to the maximum extent feasible.</td>
</tr>
<tr>
<td>County Traffic Engineer, or his/her designee</td>
<td>3. Submit an MEF Design Review Application (MEF Application) with supporting documents (MEF Documentation) to the County Traffic Engineer, or his/her designee, for pedestrian facilities that cannot be altered to fully comply with the applicable accessibility standards, and obtain approval before final construction plans are approved. Design Engineers or Project Managers shall submit MEF Applications and Documentation to the County Traffic Engineer, or his/her designee, during the regularly scheduled Engineering Design and Development Standards (EDDS) deviation meeting.</td>
</tr>
<tr>
<td></td>
<td>4. Ensure that the Construction Engineer or Inspector receives a copy of the approved MEF Application and Documentation and is aware of the pedestrian facilities that will not fully comply with applicable standards.</td>
</tr>
<tr>
<td></td>
<td>5. a. Review the MEF Applications and Documentation to ensure that all applicable accessibility standards are met to the maximum extent feasible.</td>
</tr>
</tbody>
</table>
|                             | b. Upon making a determination, check the appropriate box on the MEF Application, add comments to the application as needed, and sign and
<table>
<thead>
<tr>
<th><strong>Program Planning</strong></th>
<th>6.</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Program Planning will assign a file number to approved MEF Applications and Documentation and provide a copy of the approved MEF Application and Documentation to the Design Engineer or Project Manager who submitted the MEF Application.</td>
<td></td>
</tr>
<tr>
<td>b. For MEF Applications and Documentation that are approved with conditions, Program Planning will coordinate with the Design Engineer or Project Manager to ensure that the terms set forth by the County Traffic Engineer, or his/her designee, are met.</td>
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<tr>
<td>c. MEF Applications and Documentation that are submitted to Program Planning that have not been approved shall be returned to the Design Engineer or Project Manager who submitted the MEF Application.</td>
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</table>

<table>
<thead>
<tr>
<th><strong>Construction Engineer or Inspector</strong></th>
<th>7.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Understand and comply with the accessibility standards, responsibilities, and documentation requirements identified in Policy - 4400.</td>
<td></td>
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</table>

<table>
<thead>
<tr>
<th><strong>Design Engineer or Project Manager</strong></th>
<th>9.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Obtain approval from the County Traffic Engineer, or his/her designee, for revisions to approved pedestrian facility designs due to unforeseen field conditions before the final inspection and project close-out.</td>
<td></td>
</tr>
</tbody>
</table>
### Appeals Procedure

10. Appeals shall be handled as follows:

a. The Design Engineer or Project Manager shall send a letter to the County Traffic Engineer, or his/her designee, including the original MEF Application and Documentation, and a statement of the engineering reasons why the County Traffic Engineer’s (or his/her designee’s) decision should be reconsidered.

b. The County Traffic Engineer, or his/her designee, shall then forward the request and documents to the County Engineer for review.

c. The County Engineer will return his/her decision to the Design Engineer or Project Manager within 14 calendar days.

d. The County Engineer shall forward approved MEF Applications and Documentation to Program Planning to be processed according to the steps outlined in Action 6, above.

Attachments: MEF Design Review Application for Pedestrian Facilities Altered in the Public Right-of-Way
A. INSTRUCTIONS

(1) This application is to request an official County review of “maximum extent feasible” (MEF) design documentation for the occasional case where a pedestrian facility in the public right-of-way cannot be altered to comply fully with accessibility standards. The “maximum extent feasible” that can be achieved shall be determined and approved by the County Traffic Engineer, or his/her designee.

(2) Any features of a pedestrian facility that can be made accessible shall be made accessible regardless of whether or not some features cannot be altered to fully comply with applicable accessibility standards. MEF Applications and supporting documentation shall not be approved where there is an attempt to justify acceptance of pedestrian facilities that were improperly designed or constructed.

(3) MEF documentation must be stamped and signed by a Professional Engineer licensed to practice in the State of Washington.

(4) Applicants for County capital projects and Road Maintenance projects shall bring their MEF Design Review Applications and supporting MEF documentation to the regularly scheduled MEF Design Review meeting, and can call (425) 388-6438 for more information about meeting dates, times, and locations.

(5) Applicants for private development or utility franchise projects shall submit MEF Design Review Applications and supporting MEF documentation to the Planning and Development Services project manager or reviewer assigned to their project.

(6) Submit one MEF Design Review Application per project (to the extent practicable). The supporting MEF documentation can include multiple pedestrian facilities to be reviewed for the same project.

(7) MEF documentation shall provide sufficient detail to clearly identify the location of each pedestrian facility to be evaluated, and:
   a. Reference the applicable accessibility standard for each pedestrian facility where standards cannot be fully complied with;
   b. Describe the circumstances that make it virtually impossible to achieve full compliance;
   c. Document design alternatives that were considered in an attempt to comply with standards;
   d. Describe how accessibility standards are met to the “maximum extent feasible”; and,
   e. Attach drawings, engineering calculations, or other data to substantiate the request.

(8) By signing the application, the applicant acknowledges and agrees that the development application may be delayed by up to 21 calendar days to allow the County Traffic Engineer, or his/her designee, to review the MEF documentation.
B. APPLICANT INFORMATION
Name: ___________________________________________________ Phone: ____________________
Company/Agency/County Division_______________________________________________________
Address: ____________________________________    City: _________________  ZIP: __________
E-Mail Address: _______________________________________________________________________
Signature: __________________________________________________   Date: ____________________

C. PROJECT AND PEDESTRIAN FACILITY INFORMATION
Place a check mark in the box below that best describes the project being reviewed:
☐ Road Maintenance  ☐ County Capital  ☐ Private Development  ☐ Utility Franchise  ☐ Other: ___________

For Road Maintenance and County Capital projects, provide the following:
Project #:   RC/RM/RR/RO___________________________   UPI:  __________________________

For Private Development or Utility Franchise projects, provide the following:
PFN:___________________  Project Manager/Reviewer’s Name: __________________________

Project Name: _________________________________________________________________________
Facility Type(s): _______________________________________________________________________
Provide a description of the project location:
_____________________________________________________________________________________
_____________________________________________________________________________________

D. MEF DESIGN REVIEW DETERMINATION
The pedestrian facilities in the public right-of-way described in the Applicant’s supporting documentation comply with applicable accessibility standards to the “maximum extent feasible.”

☐ Approved       ☐ Approved with Conditions       ☐ Disapproved
Comments: ________________________________________________________________
_____________________________________________________________________________________
_____________________________________________________________________________________
_____________________________________________________________________________________
_____________________________________________________________________________________

County Traffic Engineer       Date
Maximum Extent Feasible Documentation

Project: 116th St SE/56th Ave SE
Project Limits: Intersection
UPI 10-0021-1: Funding code: RC1639
Prepared by: Sheela George, Project Engineer

Project Manager: Matt Ojala, P.E.

Owen B. Carter, P.E.
Snohomish County Engineer
Date 10/5/12
Project Description
116th St SE/56th Ave SE Intersection project will improve the sight distance at the intersection.

The existing curb ramps will be removed and new ADA-compliant curb ramps will be installed at the intersection.

Existing Conditions
The existing road grades at the intersection are as follows:

- 116th St SE (West Leg) = (-) 9.6% (Arterial)
- 116th St SE (East Leg) = (-) 13.1%
- 56th Ave SE (South Leg) = (+) 4.18%
- 56th Ave SE (North Leg) = (-) 5.36% (Arterial)

The south leg of the intersection was temporarily closed to traffic due to insufficient sight distance. A new development is being constructed at the northeast corner of the intersection. There are two retaining walls: one at the northeast corner and one at the southwest corner.

None of the existing ramps at the intersection met the current ADA standards (2005 PROWAG).

Proposed Improvements
To improve the sight distance and provide better traffic management and traffic control a mini roundabout was proposed at the intersection. The mini roundabout and the circulatory roadway were benched to provide a relatively flat slope at the intersection to provide sight distance and pedestrian access. The layout of the splitter islands along all legs of the intersection will better channel traffic through the intersection. The following are the proposed road grades:

- 116th St SE (West Leg) = (-) 12.65%
- 116th St SE (East Leg) = (-) 16.28%
- 56th Ave SE (South Leg) = (+) 4.18%
- 56th Ave SE (North Leg) = (-) 7.84%

The proposed road profile is steeper due to:
1. Benching for the mini roundabout
2. Match the project at the next intersections on 116th (east and west), without re-grading the road into the next intersections which is outside the project scope.

ADA Compliance requirements
Compliance with ADA will control the design of six components of this project. The ADA design requirements are:
<table>
<thead>
<tr>
<th>Pedestrian Accessible Route: Width =4’ min.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sidewalks</td>
</tr>
<tr>
<td>Sidewalk grades</td>
</tr>
<tr>
<td>cross-grades</td>
</tr>
<tr>
<td>Ramps</td>
</tr>
<tr>
<td>Ramp grades</td>
</tr>
<tr>
<td>cross-grades</td>
</tr>
<tr>
<td>Landings</td>
</tr>
<tr>
<td>Counter slopes</td>
</tr>
</tbody>
</table>

**Justification for Maximum Extent Feasible**

Pedestrian crossing on the west leg of 116th St SE has been eliminated due to minimal sight distance and because of an existing retaining wall blocking the sight distance. A warning sign will be posted with a “Use Crosswalk” sign to direct pedestrians to the adjacent crosswalk.

The cross slope of 5% could not be met on the crosswalks due to the following reasons:

Even though the intersection was benched to improve the sight distance at the intersection, the benching could not be extended to the pedestrian crosswalk due to the project limit scope which would require extending the project limits into the next intersection (re-grading into the adjacent intersection) at the east and west project limits on 116th St SE. Due to the existing steep grades of the road profile, retaining walls at the northeast corner and northwest corner, and the limits of the projects scope, the standards for the cross walk grades could not be achieved. The cross walk follows the road profile and hence the cross walk slope does not meet the ADA grade of 5%.

However, the curb ramps and the pedestrian facilities, the crosswalk cross slopes and landing have been improved over the existing conditions, as shown in the attached spreadsheet. The cross walk grades were minimized to the maximum extent feasible by positioning these as close to the circulating roadway (roundabout) as possible.

The roundabout layout at the intersection improved the sight distance, pedestrian facility and better traffic control at the intersection from the existing conditions.
### 116th St SE/56th Ave SE Intersection Improvement

**Documentation of Maximum Extent Feasible for sidewalk curb ramps**

**As-Designed:** Sheila George  
**As-Built check:** Cola Estil

<table>
<thead>
<tr>
<th>Ramp #</th>
<th>Location</th>
<th>Parallel Ramp - Left or Single</th>
<th>Parallel Ramp - Right</th>
<th>Justification for Maximum Extent Feasible</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>(a) Width / Cross Slope</td>
<td>(b) Length / Running Slope</td>
<td>(c) Width / Cross Slope</td>
</tr>
<tr>
<td></td>
<td></td>
<td>(e) Flare Slope 10% Max</td>
<td>(f) Gutter Slope Counterslopes</td>
<td>(g) Width / Cross Slope</td>
</tr>
<tr>
<td></td>
<td></td>
<td>(i) Right</td>
<td></td>
<td>(j) Right</td>
</tr>
<tr>
<td></td>
<td></td>
<td>15' Max / 8.3%</td>
<td></td>
<td>15' Max / 8.3%</td>
</tr>
<tr>
<td>Northwest corner</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ramp 1</td>
<td>56th</td>
<td>Eliminated</td>
<td></td>
<td>Eliminated</td>
</tr>
<tr>
<td></td>
<td></td>
<td>6' 4'/1.5%</td>
<td>5'/0.2%</td>
<td>5'/1.5%</td>
</tr>
<tr>
<td></td>
<td></td>
<td>4'/1.5% 5'/0.2%</td>
<td></td>
<td>4'/1.5% 5'/0.2%</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Gutter slope follows the road. It is not feasible to provide crossing without re-grading road into the adjacent intersection.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ramp 2</td>
<td>116th</td>
<td>Eliminated</td>
<td></td>
<td>Eliminated</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Cross walk has been eliminated due to minimal right of way because of a retaining wall at the corner. &quot;No Ped Crossing&quot; sign installed to direct pedestrians to crosswalk.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Northeast corner</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ramp 1</td>
<td>56th</td>
<td>Eliminated</td>
<td></td>
<td>Eliminated</td>
</tr>
<tr>
<td></td>
<td></td>
<td>6' 4'/1.8%</td>
<td>6'/2.3%</td>
<td>6'/1.6%</td>
</tr>
<tr>
<td></td>
<td></td>
<td>4'/1.8% 6'/2.3%</td>
<td></td>
<td>4'/1.6% 6'/2.3%</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Gutter slope follows the road. It is not feasible to provide crossing without re-grading road into the adjacent intersection.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ramp 2</td>
<td>116th</td>
<td>Eliminated</td>
<td></td>
<td>Eliminated</td>
</tr>
<tr>
<td></td>
<td></td>
<td>6' 4'/1.8%</td>
<td>5'/0.9%</td>
<td>4'/1.9%</td>
</tr>
<tr>
<td></td>
<td></td>
<td>4'/1.8% 5'/0.9%</td>
<td></td>
<td>4'/1.9% 5'/0.9%</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Gutter slope follows the road. It is not feasible to provide crossing without re-grading road into the adjacent intersection.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Southwest corner</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ramp 1</td>
<td>56th</td>
<td>Eliminated</td>
<td></td>
<td>Eliminated</td>
</tr>
<tr>
<td></td>
<td></td>
<td>14.7' 6.7%</td>
<td>6%/0.8%</td>
<td>6'/1.7%</td>
</tr>
<tr>
<td></td>
<td></td>
<td>6'/1.7% 6%/0.8%</td>
<td></td>
<td>6'/1.7% 6%/0.8%</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Gutter slope follows the road. It is not feasible to provide crossing without re-grading road into the adjacent intersection.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ramp 2</td>
<td>116th</td>
<td>Eliminated</td>
<td></td>
<td>Eliminated</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Cross walk has been eliminated due to minimal right of way because of a retaining wall at the corner. &quot;No Ped Crossing&quot; sign installed to direct pedestrians to crosswalk.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Southeast corner</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ramp 1</td>
<td>56th</td>
<td>Eliminated</td>
<td></td>
<td>Eliminated</td>
</tr>
<tr>
<td></td>
<td></td>
<td>6' 4'/1.8%</td>
<td>4.5'/1%</td>
<td>4'/1.0%</td>
</tr>
<tr>
<td></td>
<td></td>
<td>4'/1.8% 4.5'/1%</td>
<td></td>
<td>4'/1.0% 4.5'/1%</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Gutter slope follows the road. It is not feasible to provide crossing without re-grading road into the adjacent intersection.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ramp 2</td>
<td>116th</td>
<td>Eliminated</td>
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<td></td>
<td></td>
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</tr>
</tbody>
</table>

*XX* Does not meet Standard  
[*] Ramp length held to 15-feet to prevent chailing grade (PROHIG688886.2.2.1)  
[**] Road profile is at 16.28% down M4. Using 15% rule to prevent chailing grade increased the running slope. It is not feasible to meet the standard without grading road into the adjacent intersection.
### 116th St SE/56th Ave SE Intersection Improvement

#### Crossing/Crosswalk Geometrics

<table>
<thead>
<tr>
<th>Crossing/ Crosswalk Label</th>
<th>Ramp to Ramp</th>
<th>Stop Controlled</th>
<th>Maximum Running Slope 5%</th>
<th>Maximum Cross Slope 2% [5% non-stop controlled]</th>
<th>Remarks</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>Existing</td>
<td>Proposed</td>
<td>Existing</td>
</tr>
<tr>
<td>56th Ave SE - North</td>
<td>No</td>
<td></td>
<td>3.1%</td>
<td>1.0%</td>
<td>9.6%</td>
</tr>
<tr>
<td>116th St SE - East Leg</td>
<td>No</td>
<td></td>
<td>2.0%</td>
<td>1.0%</td>
<td>9.8%</td>
</tr>
<tr>
<td>56th Ave SE - South Leg</td>
<td>No</td>
<td></td>
<td>4.6%</td>
<td>1.0%</td>
<td>5.4%</td>
</tr>
<tr>
<td>116th St SE - West Leg</td>
<td></td>
<td></td>
<td>1.1%</td>
<td>-</td>
<td>6.2%</td>
</tr>
</tbody>
</table>

XX Does not meet Standard