



King County

**Department of Permitting
and Environmental Review**

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**FINAL CODE INTERPRETATION
CINT-15-0004 (Snoqualmie Valley School District)**

Background

The Snoqualmie Valley School District (SVSD) has proposed to install field lights at Chief Kanim Middle School in Fall City to illuminate the track and football/soccer field in a public/private partnership with a local soccer club. The school and its athletic fields are located in the R-4 zone. The plan calls for five field light poles 60-70 feet in height with a bank of lights which will illuminate similar to daylight; three of the five light poles would be placed in the setback pursuant to King County Code (K.C.C.) 21A.12.170(H). For safety and functionality, the three lights on the west side of the track would end up being about 25 feet from the property line.

K.C.C. 21A.12.220.B states that the building setback line shall be 30 feet from property lines for non-residential land uses in the R-4 zone. **K.C.C. 21A.12.030** specifies that the base height for the R-4 district is 35 feet, with an allowance to go one foot higher for each foot of additional building setback.

K.C.C. 21A.12.170 Setbacks – projections and structures allowed, states “structures may extend into or be located in required setbacks, including setbacks as required by K.C.C. 21A.12.220.B,...” Then, under item H., the codes calls out the following structures, “H. Telephone, power, *light* (emphasis added) and flagpoles;....”

KCC 21A.12.180 Height – exception to limits, states “The following structures may be erected above the height limits of KCC 21A.13.030-.050.” Then, under item B., the code calls out the following structures, “B. Fire or parapet walls, skylights, flagpoles, chimneys, smokestacks, church steeples, crosses, spires, communication transmission and receiving structures, utility line towers and poles, *and similar structures* (emphasis added).”

KCC 21A.12.030.B.4 – Densities and dimensions – residential and rural zones states, “Height limits may be increased if portions of the structure that exceed the base height limit provide one additional foot of street or interior setback for each foot above the base height limit, but the maximum height may not exceed seventy-five feet.”

Discussion

K.C.C. 21A.12.170.H clearly allows telephone, power, and light poles within setbacks. There is not enough of a distinction in the code to regulate field lights separately from light poles.

On the issue of height, KCC 21A.12.180.B allows items generally attached to buildings or structures (such as fire or parapet walls, skylights, flagpoles, chimneys, smokestacks, church steeples, communication structures, and smokestacks), not usually visible at night (such as

utility line towers and poles) and similar structures to exceed the height requirements for the zone.

As depicted on the photometric imaging in Attachment B of the application for Code Interpretation prepared by Musco Lighting and submitted by the applicant, the proposed LED field lights appear to blend in to the night sky with the exception of a small bank of lights shielded and directed downward at the field.

This provision of the King County Code was written in 1993 when the technology for field lighting was different than it is today. At that time, field lights generally consisted of a bank of large lights which illuminated both the field and the areas adjacent to the field.

Today's lighting is smaller; when located at the top of a pole, it can be directed to specific locations. The poles themselves are generally thinner. The code provides flexibility for certain structures that, by their function or design, exceed the allowed base height in the zoning district where they are located. These are captured under the "similar structures" term in the list of allowable structures.


Additionally, the field has been in place for many years as have the setbacks. Placement of the light poles outside the setback area would locate them at the edge of the field which is a player safety issue; it would be easy for players to run into the poles during a game. A convoluted design of the pole to get the ground connection away from the field but the lighting out over the field is not practical.

Conclusion

Field lighting of the kind identified in the Musco Lighting photometric images does appear to be similar to the structures identified in K.C.C.21A.12.180.B because it utilizes a small bank of LED lights, the lights are shielded, and the structure blends into the night sky. The light poles proposed by the Snoqualmie Valley School District for installation around the Chief Kanim Middle School field do qualify as "similar structures" as identified in K.C.C. 21A.12.180.B. and may be located within the setback along the west side of the school property.

Finality of Code Interpretations

Under K.C.C. 2.100.050.A, the director's decision on a code interpretation is final. A code interpretation issued by the director governs all staff review and decisions unless withdrawn or modified by the director or modified or reversed on appeal by the King County hearing examiner, King County council, or an adjudicatory body (K.C.C.2.100.040.H).



John F. Starbard, Director
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Date