



City of Seattle

Gregory J. Nickels, Mayor
Department of Planning and Development
D. M. Sugimura, Director

**CITY OF SEATTLE
ANALYSIS AND DECISION OF THE DIRECTOR OF
THE DEPARTMENT OF PLANNING AND DEVELOPMENT**

Application Number: 3003442
Council File Number: CF #307855
Applicant Name: David Graves for Seattle Department of Parks and Recreation
Address of Proposal: 2101 Northwest 77th Street

SUMMARY OF PROPOSED ACTION

Council Land Use Action to remove six existing athletic field lights and install eight new light poles up to 100 ft. in height (Loyal Heights Playfield). Resurfacing the playfield with synthetic turf and remodeling bathrooms will be under separate action.

A Determination of Non-Significance was previously prepared and issued by the Seattle Department of Parks and Recreation.*

*Note: The project description has been revised from the original notice of application.

The following approval is required:

Council Land Use Action – Council Concept Approval to waive or modify development standards for a City facility (installation of light poles and fixtures) SMC 23.44.036A; specifically to allow additional height for structures in a single-family zone (maximum allowed, 30 feet; proposed, 100 feet, SMC 23.44.012A).

SEPA – To impose conditions – (Chapter 25.05, Seattle Municipal Code.)

SEPA DETERMINATION: [] Exempt [X] DNS* [] MDNS [] EIS
[] DNS with conditions

[] DNS involving non exempt grading or demolition or involving another agency with jurisdiction.

*Determination of Non-Significance issued by the Seattle Department of Parks and Recreation on October 3, 2005.

BACKGROUND INFORMATION

Site and Vicinity Description

The project site is the Loyal Heights Playfield located in the Ballard neighborhood of Seattle. This property is bounded by 22nd Avenue Northwest on the west, 20th Avenue Northwest on the east, Northwest 77th Street to the north and Northwest 75th Street to the south.

This rectangular-shaped site is approximately six acres. Development on the entire subject site consists of a community center (Loyal Heights Community Center) situated at the northeast corner; a play area with asphalt walkways at the northwest corner; and an athletic playfield (almost three acres) covering the southern portion of the site. This athletic playfield has a natural turf surface with a baseball infield and backstop located at the southwest corner, a softball infield and backstop located at the northeast corner, and a football/soccer field overlay oriented northwest to southeast. The athletic playfield is currently illuminated by six 80' tall light poles. Twenty (20) existing angled surface parking spaces are situated along the site's westerly boundary line and are accessed via Northwest 77th Street.

All four streets-22nd Avenue Northwest, 20th Avenue Northwest, Northwest 77th Street and Northwest 75th Street-are classified as non-arterials, improved with curbs, sidewalks and gutters.

The zoning classification for this site and the surrounding residential properties is Single Family 5000 (SF 5000). Uses immediately west, east, north and south are single family residences. Three public schools (Loyal Heights Elementary, Whittier Elementary and Ballard High School) are within one (1) mile radius of the subject site.

As a result of a pre-application site visit conducted by a DPD site inspector, portions of the site (specifically along the east property line and south of the existing play area) were identified as Environmentally Critical Area (ECA)-Steep Slope. The applicant applied for an ECA exemption and DPD determined that no ECA review is required. Per the DPD geotechnical reviewer, "Based on the submitted document, any 'steep slope' designation for the subject site appeared to be a mapping error. The site does not appear to contain any 'steep slope areas' as defined by SMC 25.09.02."

Proposal Background

The portion of Loyal Heights Playfield to be improved through this proposal is the athletic playfield area. *The Loyal Heights Playfield Improvements*, presented in the SEPA DNS issued on October 3, 2005, proposed three play fields with new synthetic turf playing surfaces and all illuminated with 10 new 80 ft. tall lighting poles. Following an appeal of the adequacy of the SEPA DNS, and a remand by the

City Hearing Examiner, the Parks Department elected to modify the original proposal by decreasing the proposed amount of lighting poles to eight and increasing the lighting poles' height to a maximum of 100 ft.

Proposal

Seattle Parks and Recreation proposes to remove six athletic light poles and install a new lighting system consisting of eight new light poles measured 80'-100' in height, supporting adjustable 1,000 watt (W) High Intensity Discharge (HID) metal halide luminaires (light fixtures) and security lighting at Loyal Heights Playfield. Underground wiring surrounding the entire athletic playfield area will be routed to a new lighting control cabinet installed behind the proposed softball field backstop. Additional underground wiring will be routed to an existing lighting control cabinet in a storage room located in the community center building.

The lighting system is designed to limit spill light and glare by raising the floodlight mounting heights from the code maximum 30' to a height of 80'-100'. This would allow a more direct downward lighting of the play surface with steeper floodlight aiming angles. The lamps themselves are proposed to be shielded luminaires, including hoods and louvers that will provide necessary on-field lighting levels and will comply with Illumination Engineering Society of North America (IENSA) recommended specifications for a Class IV or "recreational" facility.

Class IV is the lowest of the four light levels. This design level would provide an average light level at the playing field surface of 20 to 30 foot-candles (a foot-candle, or fc, being defined as a lighting level of one lumen distributed uniformly over an area of one square foot), depending on the specific requirements for each field. The soccer and football fields would require 20 fcs average maintained; whereas the baseball/softball fields would require 30 fcs average maintained for the infield areas and 20 fcs average maintained for outfield areas.

The lighting system would be operated by an automatic programmable lighting control system. The lights for each field would be operated separately so that lights could be turned off when a particular field was not in use. The system would have the capability of being operated from a remote location and on-site with a secured manual override capability.

Public Comments

The required public comment period ended on March 8, 2006. DPD received no written comments regarding this proposal.

Additionally, prior to application with DPD, the Seattle Parks Department undertook substantial public outreach which included the following actions:

- Project information posted on the Parks Department website, given to local media outlets, posted at the site and mailed to over 3,000 neighbors and interested parties.

- Three public meetings held in the months of March 2005, April 2005 and June 2005 facilitated by Parks Department Staff. Two additional public meetings were held in the months of December 2005 and January 2006 to specifically discuss the lighting upgrades.

Additional Background Information

Athletic fields have always been an important part of the City of Seattle's Parks system. Beginning in the late 1970s, however, the Parks Department found that demand had grown due to increases in adult sports leagues and especially by the participation by women and girls in a variety of sports, a trend which appears to have continued. In addition, demand for sports facilities to serve soccer, ultimate frisbee, rugby, and lacrosse has driven the need for additional field capacity. This expansion in participants has been accompanied by a demand for increased year-round rather than single-season participation in most of the sports activities.

Because of the limited availability of new open spaces for active recreation within the City and the need to increase scheduling capacity, the Parks Department commissioned a lighting study to develop a predictable method for the planning, design, and development of athletic field lighting systems within the City of Seattle. A portion of the study (McGowan Broz Engineers/DMD, 2001) analyzed the impacts of extending sports play into the evening at City-owned facilities and included a section on Recommended Sportsfield Lighting Performance Standards. These standards focus specifically on a portion of the study titled *Light Trespass – Spill Light*. The standards are described as follows:

“The maximum maintained vertical illuminance level for spill light must not exceed 0.8fc (initial 1.1fc) at the residential property line.

“The designer shall undertake initial vertical illuminance calculations on a line along the edge of the properties and roadways as defined by the City to establish compliance with the 0.8fc level. The levels shall be calculated at five feet above grade.”

In 2003, the Parks Department authored a document titled *Design Standards for Athletic Field Lighting* (<http://www.seattle.gov/parks/projects/standards/design.asp>). This document outlines issues that should be considered during the design phase of an athletic field lighting project and design standards on technical issues such as field lighting levels and obtrusive light.

For this project, the Parks Department considers these recommendations/standards for the primary design and performance parameters. Parks has incorporated equipment specifications and calculations of the predicted levels of illuminance at the residential property lines surrounding the project site to fall within those recommended in the study.

ANALYSIS—LAND USE DECISION

Public parks are City facilities permitted outright in SF 5000 zones. As is the case with many public facilities, the development standards of this zone constrain the facility in ways that hamper their fundamental purpose; to provide recreational opportunities. The Seattle Land Use Code sets a base height limit for structures in Single Family Zones at 30' (SMC 23.44.012). The Seattle Parks

Department seeks a Council modification of the height development standards of the Single Family Zone as they relate to the proposed light poles. The proposed luminaries are designed to function properly at a mounting height of 80' to 100' in order to reduce the impacts of spill light and to provide adequate illumination for sports play at this location. If the proposed lighting system pole height was limited to 30' it would not function properly. 30' tall poles would not provide enough height allowance in order to aim fixtures more accurately downward onto the athletic field; thus, spill light and glare lighting onto surrounding residential properties would not be improved. It is for situations like this that section 23.76.064 of the Seattle Municipal Code includes provisions for the City Council to waive or modify applicable development standards, accessory use requirements, special use requirements or conditional use criteria for City facilities.

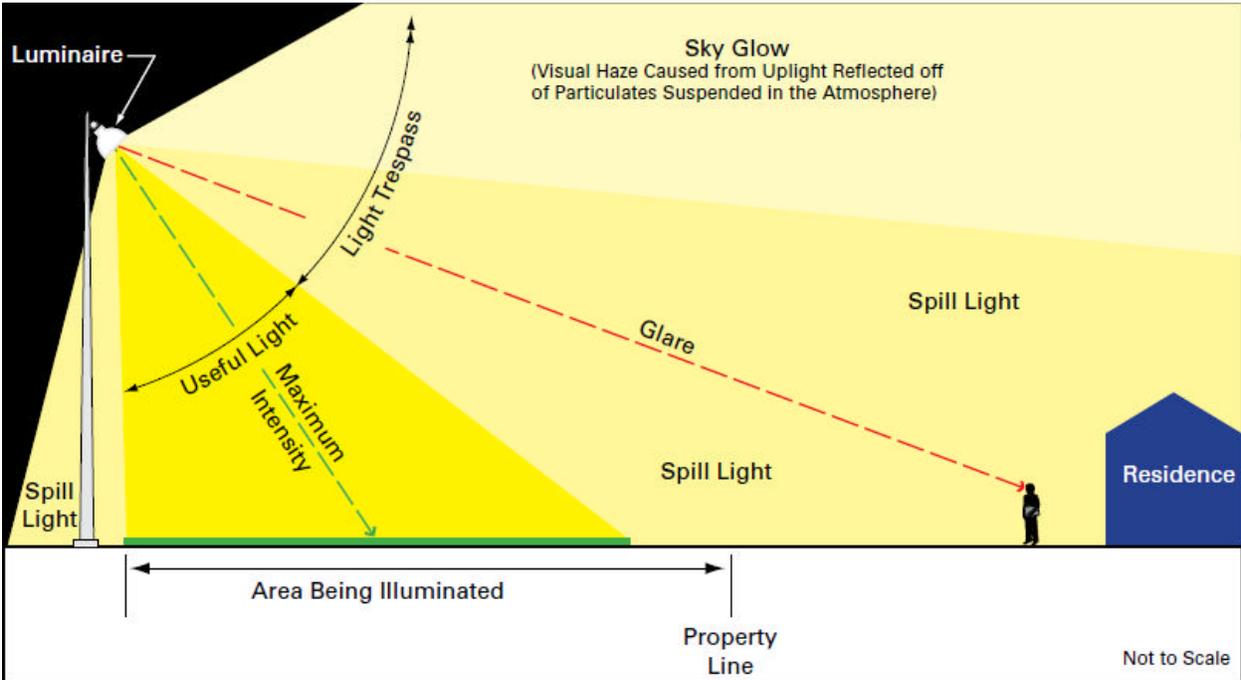
In making a recommendation to Council, SMC 23.76.050 charges the Director to draft an evaluation of the proposal based on the standards and criteria for the approval sought and consistency with the applicable goals and objectives of Seattle's land use policies as referenced in SMC Chapter 23.12, the City's SEPA policies and any other applicable official City policies.

Outside of consistency with the SEPA policies, which are adequately described in the Parks Department's Determination of Non-Significance, the Land Use Code and Comprehensive Plan policies do not speak directly to issues of exterior lighting as described in SMC 23.44.008H except to reduce the adverse impacts from incompatible land uses. In this case, the park use is both permitted and compatible with surrounding residential uses. The general development standards for uses permitted outright simply state that "Exterior lighting shall be shielded and directed away from residentially zoned lots". However, applicable code and policy language does exist within SMC 23.44 to inform the Director's evaluation of this project.

On Feb 20, 2001 Ordinance 120266 was adopted by Council to allow taller lighting standards for public school playfield lighting where necessary to improve safety for athletic participants and minimize impacts of light trespass and glare. Set forth in this Ordinance and the amended Land Use Code sections are criteria that represent the most recent thinking with regard to this issue. Section 23.44.017B6 of the Code reads:

Light standards for illumination of athletic fields on new and existing public school sites will be allowed to exceed the maximum permitted height, up to a maximum height of one hundred (100) feet, where determined by the Director to be necessary to ensure adequate illumination and where the Director determines that impacts from light and glare are minimized to the greatest extent practicable. The applicant must submit an engineer's report demonstrating that impacts from light and glare are minimized to the greatest extent practicable. When proposed light standards are reviewed as part of a project being reviewed pursuant to Chapter 25.05, Environmental Policies and Procedures, and requiring a SEPA determination, the applicant must demonstrate that the additional height contributes to a reduction in impacts from light and glare.

This application is not a Public School site and therefore, is not eligible for the special exception process. However, with regards to the project’s anticipated impacts, this code section is informative as it describes a situation under which additional pole height should be granted. The Director finds this section to be the code or policy language that is most apposite and that upon which a recommendation might be predicated. The following is a brief response to those impact areas that should be considered as described by the Single Family section of the code. Additionally, the illustration below (provided by the lighting consultant) is provided to assist in illustrating technical terms that will be discussed throughout this report.



Spill Light

The term “spill light” is defined as illuminance (light) falling beyond the area being illuminated. Spill light is expressed in foot-candles (fc) and is normally measured in the vertical plane. It is Park’s goal to reduce the opportunity of spill light onto the surrounding residential properties. Diagrams submitted by the Parks Department’s lighting consultant, (DMD) demonstrate when additional mounting height for field lighting is permitted, the light is allowed to focus in a more vertical direction; thus, containing more light on the athletic field. Parks predicts that the majority of the spill light coming directly from the sports field luminaires would land on areas immediately adjacent to the fields, inside the park boundaries and onto the adjacent paved roadways. No spill light is predicted to extend onto the surrounding residential properties. Additional mitigating measures to reduce potential spill light such as vegetative screening consisting of tall shrubs and trees along the southern and northern athletic field boundaries and the installation of adjustable luminaires are also proposed.

As noted above, under “Additional Background Information,” the Parks Department has adopted a sports field lighting standard with a guideline that the maximum light level at the nearest residential

property line should not exceed 0.8 vertical foot-candles maximum maintained (1.1 foot-candles initial). All the sports fields included in this application as proposed to be developed with new light standards and luminaires would appear to meet this standard. Consequently, the proposed action would not result in adverse spill light impacts for residential properties adjacent to the park and project site.

Glare

Glare is light that hinders or bothers the human eye due to the eye's difficulty in adjusting to different levels of light. Direct glare from a light source is typically an important issue in the design and operation of athletic field lighting installations, both in terms of players and nearby populations. Topography and vegetation can change the impacts of glare. There is no industry standard for measuring glare once a project is completed. However, there may be design steps that may mitigate the effects of glare such as increased pole height and minimizing direct view of the lamps.

The Parks Department's goal is for the new lighting system to "reduce the level of objectionable neighborhood glare". Per the document *'Design Standards for Athletic Field Lighting'*, a glare analysis should occur during the design phase. This analysis should include the lighting designer reviewing candlepower curves and determining the appropriate luminaire mounting height and optical system so that no greater than 12,000 candlepower from any given luminaire is visible from the residential property line. This document also specifies the engineer shall measure and record all illumination levels in accordance with IESNA LM-5 guidelines. Per Parks, if the lighting performance does not equal this guidelines or the performance expected by the citizens, the Design Engineer and Contractor must respond with adjustments or modifications that within reason both meet objective criteria and any unresolved community needs regarding control or elimination of objectionable light.

The proposed lamps would be visible from the surrounding residential properties. However, certain mitigation measures have been built into the design of the lighting systems in order to minimize glare impacts in the surrounding neighborhood. These include:

- use of shielded aimable lighting fixtures which are adjustable;
- installing taller poles and increasing luminaire mounting heights to permit more downward aiming angles and greater control of the light;
- performance verification of the lighting system that allows for final adjustments of the luminaires after installation to address possible issues of glare.

Sky Glow

Sky glow is defined as "the haze or glow of light emitted above the lighting installation and reduces the ability to view the darkened nighttime sky. This is a combination of light emitted directly from the light source and reflected light that casts upward from the surface being illuminated. The level of sky glow is also impacted by atmospheric conditions; clouds and moisture increase the effects of sky glow". Parks' design standards require a sky glow assessment during the design stage. However, Parks recognizes that this method does not account for the reflected light from the field surface or the atmospheric conditions. Therefore, reflected light off of the lighted surface remains a concern.

It has been the experience of DPD in the evaluation of other sports field lighting proposals and the Parks Department that it is possible to reduce additional sport field lighting impacts through operational mitigation measures—specifically, restricting the hours and days of sports field operation. This proposal includes the following mitigation measures:

- The athletic field lights will be turned off at 10:00 p.m.
- Parks will not schedule games or practices for Sunday evenings.

DPD finds that a Parks policy for a scheduled cut-off for field illumination and a dark night on Sundays will effectively mitigate most of the impacts of sky glow.

Noise, Traffic and Parking

This application is to remove six (6) 80' tall athletic light poles and install a new lighting system consisting of eight (8) new light poles measured 80'-100' in height above the finished grade at the edges of the playfields. While clearly this request for concept approval of the proposed lighting standards is more directly related to environmental issues such as glare, spill light and sky glow; elements of traffic, noise and parking are indirectly impacted by allowing additional play time enabled by enhanced artificial illumination.

The Seattle Noise Ordinance regulates “unreasonable noises”, including unamplified human voices between the hours of 10:00 p.m. and 7:00 a.m. (SMC 25.08.500). It is expected that noise associated with sports play at this field and vehicular noise would not increase due in part to extended play time allowed in the evenings. Current playfield scheduling allows for two (2) baseball or softball games to be played concurrently, or one (1) soccer game. Parks states the athletic field will continue in use at the same level of play. Additionally, Seattle Parks Department states in the submitted environmental documents that no games or practices will be scheduled on Sunday evenings.

Heffron Transportation, Inc. prepared a Supplemental Parking and Transportation Impact Analysis (dated March 14, 2006) for this proposal. The transportation consultant provided the following key findings:

- Peak traffic and parking conditions occur during fall Saturdays when numerous and consecutive youth football games occur at the subject site.
- There is adequate on-street parking supply adjacent to the park to accommodate the new activities expected during winter season.
- The four (4) intersections surrounding the site would operate very well (Level of Service (LOS) A will little delay) with the project.

In summary, the proposed field improvements would not change the capacity of the field or the field orientation in anyway that would increase the peak season activity of youth football games occurring during the fall months. As a result, the playfield improvement project is not expected to exacerbate the existing conditions. However, seasonal activity and high-attendance events were identified as existing impacts in the report that should be addressed. Therefore, Parks will schedule high-attendance events (such as tournament games) and fall football games at least one (1) hour apart to allow participants and

spectators from one (1) event to leave prior to spectators and participants from the next arriving to warm up.

Impacts associated with traffic, parking and noise are not anticipated to be significant in the Parks Department Environmental analysis-especially with the previously mentioned mitigation in place. The Director concurs with the Parks Department's findings in its SEPA analysis that no additional conditioning is warranted

Conclusion

In making a recommendation to Council, SMC 23.76.050 charges the Director to draft an evaluation of the proposal based on the standards and criteria for the approval sought and consistency with the applicable goals and objectives of Seattle's land use policies as referenced in SMC Chapter 23.12, the City's SEPA policies and any other applicable official City policies.

Outside of consistency with the SEPA policies, which are discussed at length in the environmental documents prepared by the Parks Department, the Land Use Code and Comprehensive Plan policies do not speak directly to issues of the height of lighting standards in City parks. SMC 23.44.017 B6 allows light standards for illumination of athletic fields on public school sites in single family zones to exceed the maximum permitted height (30') of the single family zone up to a maximum of 100', when it is demonstrated that the additional height would contribute to a reduction in impacts from light and glare.

Public or private parks and public playfields are principal uses permitted outright in single family zones. In this case, the play field use is both permitted and compatible with surrounding residential uses with impacts of height, bulk and scale adequately mitigated through siting and design considerations.

The proponent has considered the relationship of the project to the surrounding area in siting, design of the proposed light poles. The proponent's design constraints limit both spill light and glare and offer some mitigation for the effects of sky glow. As proposed, the use will be compatible with current and future uses in the vicinity and is consistent with the SEPA and Land Use Policies of the Seattle Municipal Code. The Director recommends that the modification for additional height for poles and luminaires along the margins of the various sports fields be granted, as proposed.

RECOMMENDED DECISION - COUNCIL CONCEPT APPROVAL

It is recommended that the proposed waiver to allow poles up to 100 feet in height at this City Facility be **GRANTED.**

ANALYSIS – STATE ENVIRONMENTAL POLICY ACT (SEPA)

The Loyal Heights Playfield Improvements Project, of which the proposed field lighting is a part, has undergone an environmental review in accordance with Washington State SEPA requirements. Project specific environmental impacts of the Loyal Heights Playfield Improvements proposal have been disclosed and analyzed in the environmental checklist prepared by the Seattle Department of Parks and Recreation, acting as Lead Agency. In October of 2005, the Parks Department issued a Determination of Non-significance (DNS) for the athletic playfield improvements which was appealed. The Hearing Examiner issued an order in January 2006 remanding the DNS back to the Parks Department for further analysis and review of potential impacts related to parking demand and traffic. After the Parks Department and the appellants submitted their response and comments, the Hearing Examiner affirmed the DNS with modifications in May 2006. These modifications (which will be noted as non-appealable conditions at the end of this document) did not identify any further impacts or mitigation measures associated with light and glare.

The SEPA Overview Policy (SMC 25.05.665) clarifies the relationship between codes, policies, and environmental review. Specific policies for each element of the environment, and certain neighborhood plans and other policies explicitly referenced, may serve as the basis for exercising substantive SEPA authority. The Overview Policy states, in part, "Where City regulations have been adopted to address an environmental impact, it shall be presumed that such regulations are adequate to achieve sufficient mitigation" subject to some limitations. Under such limitations or circumstances (SMC 25.05.665 D) mitigation can be considered. Short-term and long-term adverse impacts are anticipated from the proposal.

Short-term Impacts

The following temporary or construction activities on this site could result in the following adverse impacts: construction dust and stormwater runoff, erosion, emissions from construction machinery and vehicles, increased particulate levels, increased noise levels, occasional disruption of adjacent vehicular and pedestrian traffic, and public utilities; and a small increase in traffic and parking impacts due to construction related vehicles. Several construction-related impacts are mitigated by existing City codes and ordinances applicable to the project such as: the Noise Ordinance, the Stormwater Grading and Drainage Control Code, the Street Use Ordinance, and the Building Code. Compliance with these applicable codes and ordinances will be adequate to achieve sufficient mitigation and further mitigation by imposing specific conditions is not necessary for these impacts. In addition to these existing codes and policies, the Hearing Examiner has requested additional measures noted at the end of this proposal to further mitigate construction-related impacts. Therefore, further mitigation by imposing specific conditions is not necessary for these impacts.

Long-term Impacts

Long-term or use-related impacts anticipated from the proposal include: increased bulk and scale from the additional lighting standards; increased ambient noise due to increased play activity; and increased energy consumption. These long-term impacts are not considered significant because the impacts are minor in scope and are otherwise mitigated by project design constraints.

Potential long-term impacts that may occur as a result of this project include 1) increased bulk and scale from the additional lighting standards; 2) an increase in ambient noise due to increased play activity; and 3) increased energy consumption. The latter two impacts are only related indirectly to the height of the illumination, the subject of this application; they are more properly related to the presence and quantity of artificial illumination required by the overall project. Nevertheless, these long-term impacts are not considered significant because the impacts are minor in scope and are otherwise mitigated by constraints imposed through project design.

Other impacts not noted here as mitigated by codes or conditions (increased ambient noise; increased traffic and parking demand) are not sufficiently adverse to warrant further mitigation by condition. Impacts from light and glare, however, were noted in the SEPA checklist as to warrant conditioning, so a brief discussion of those impacts is warranted.

Light and Glare

SEPA policies state with regards to Light and Glare that:

It is the City's policy to minimize or prevent hazards and other adverse impacts created by light and glare. If a proposed project may create adverse impacts due to light and glare, the decisionmaker shall assess the impacts and the need for mitigation.

Mitigation of these impacts is subject to the Overview policy. If mitigation is warranted, SEPA provides that mitigation measures can be imposed that limit the area and intensity of illumination, limiting the location or angle of illumination, limiting the hours of illumination and requiring additional landscaping. The Parks Department has imposed several of these measures as design parameters for the project as described in the foregoing analysis, chief among them the height of the light standards themselves. Furthermore, as a recommended condition of the Council Approval of the waiver of development standards, the Parks Department would be required to provide an Illumination Management Plan to be instituted as part of any eventual construction approval. This Plan would describe technological and program controls to do the following: limit the lighting of each field to evenings when play is scheduled; limit play up to the hour of 10:00 p.m.; limit illumination of any of the playfields to 15 minutes after the 10:00 PM limit of play; and limit illumination of the playfields to Monday through Saturday evenings. With the recommended Illumination Management Plan in place, no further mitigation is warranted.

Summary

In conclusion, as disclosed in the environmental documents prepared by the applicant, several impacts on the environment would result from the proposed development. Existing codes and policies successfully address some of these impacts. Other impacts are mitigated by the design heights of the light standards themselves, as discussed above. Still other impacts, although significant and adverse, will be mitigated by the applicant's limiting the days and the hours of artificial illumination on the proposed play fields. Therefore both short term and long term impacts will be sufficiently mitigated.

RECOMMENDED CONDITION(S) - SEPA

None.

RECOMMENDED CONDITION(S) – COUNCIL CONCEPT APPROVAL

It is recommended that the Parks Department should be required to provide a detailed Illumination Management Plan to include detailed technological and programmatic controls on any lighting system that will be installed at Loyal Heights Playfield. This Plan should describe technological and program controls to limit the lighting of each field to evenings when play is scheduled, limit play to the hour of 10:00 p.m., and limit illumination of the playfields to Monday through Saturday evenings. It is further recommended that this Illumination Management Plan shall be appended to any building permit applications submitted to DPD for field lighting installation at Loyal Heights Playfield.

HEARING EXAMINER CONDITIONS – SEPA (Conditions Not Open to Appeal)

Prior to the issuance of the Building Permit

1. A construction management plan (CMP) shall be prepared by the selected contractor to address traffic, pedestrian, and parking control along the site particularly at locations where trucks would be entering the roadway. This CMP shall address lane closures, sidewalk closures, and parking restrictions, if any are required.

During Construction

2. Construction truck traffic shall be directed to access the site from Northwest 75th Street and use Northwest 75th Street to access either 15th or 24th Avenues Northwest.
3. Construction employees shall be directed to park along the site's frontage on the west side of 20th Avenue Northwest.
4. Construction activities shall be limited to the hours of 7:00 a.m. to 5:00 p.m. on non-holiday weekdays. No work shall occur on weekends or holidays unless authorized by the Park Engineer.

For Life of the Project

High attendance events (such as tournament games or those with equivalent attendance) if scheduled on weekends, and fall football games, shall be scheduled at least one hour apart.

Signature: (signature on file) Date: June 29, 2006
Tamara Garrett, Land Use Planner

Department of Planning and Development

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