



**King County**  
Department of Development  
and Environmental Services  
900 Oakesdale Avenue Southwest  
Renton, WA 98055-1219

## FINAL CODE INTERPRETATION L03CI001

### Background

By letter dated January 15, 2003, Mr. Mel Daley of DMP, Inc. requested a code interpretation of K.C.C. 21A.12.050.

Mr. Daley's request is as follows:

Must the described circle be fully contained within **ALL** boundaries of the lot? At issue is the use of cul-de-sac lots and lots with pan handles in developing a subdivision. In each situation, there are portions of the lot which are smaller than the described circle. (Emphasis in original)

Letter from Mel Daley to DDES, January 15, 2003. Mr. Daley specifically asks whether K.C.C. 21A.12.050B prohibits the creation of either a "flag lot" or a cul-de-sac lot which have portions of the lot that are narrower than the prescribed circle.

This code interpretation request does not relate to a development application.

### Discussion

King County Code chapter 21A.12 establishes standards for, among other things, setbacks, height, density, and lot dimensions. K.C.C. 21A.12.030 establishes densities and dimensions for residential zones. K.C.C. 21A.12.040 establishes standards for resource, commercial, and industrial zones.

K.C.C. 21A.12.050 describes how to make measurements for some of the standards, including setbacks and minimum lot widths. K.C.C. 21A.12.050B provides:

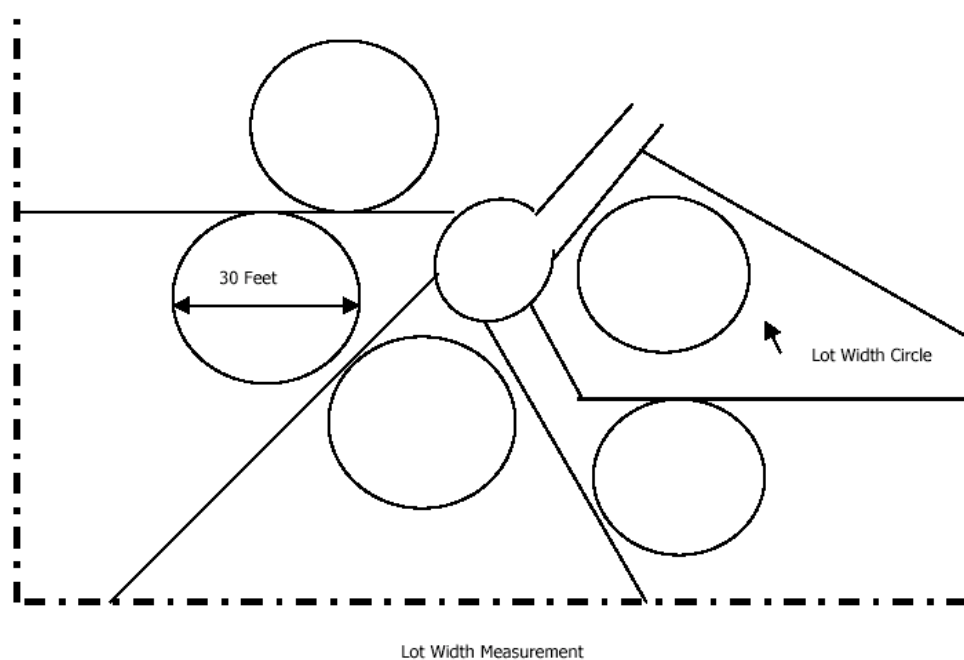
**Measurement methods.** The following provisions shall be used to determine compliance with this title:

...

B. Lot widths shall be measured by scaling a circle of the applicable diameter within the boundaries of the lot, provided that an access easement shall not be included within the circle;

....

K.C.C. 21A.12.030 establishes a minimum lot width of 30 feet in zones R-4 through R-48. The RA zones all have minimum width of 135 feet. In the R-4 zone, this means that a circle of 30 feet must fit inside the boundaries of a lot. The following illustration, included in the subdivision dimension and density checklist provided by the Department, shows one application of this requirement:



K.C.C. 21A.12.050B. does not require that the circle fit within all of the boundaries of a lot, i.e. that it be able to touch all of the boundaries of the lot. K.C.C. 21A.12.050B. specifically recognizes that in the case of an access easement, this requirement does not apply. In addition, a requirement that the circle be able to touch all of the boundaries of the lot would be inconsistent with the purpose of K.C.C. Chapter 21A.12 to provide flexibility in project design and maintain privacy. K.C.C. 21A.12.010. In RA zoned properties, with a minimum width of 135 feet, such a requirement could be difficult to implement, particularly in situations where parcel boundaries may be uneven, such as along a stream or lake. Similar problems could arise in R zones, where it would be difficult to achieve the zoned density under such a requirement.

This interpretation is also consistent with established DDES practice, as evidenced by the graphic provided as part of the densities and dimensions checklist.

