



AGENDA MEMO - COMMUNITY DEVELOPMENT

CITY COUNCIL MEETING DATE: APRIL 19, 2023

DEPARTMENT: COMMUNITY DEVELOPMENT

**ITEM DESCRIPTION: APPLICANT: WESTERN TRADES CONSTRUCTION, LLC -
OWNER: SQUARE TRADE HOLDINGS, LLC**

**** STAFF RECOMMENDATION(S) ****

CASE NUMBER	RECOMMENDATION	REQUIRED FOR APPROVAL
22-0675-WVR1	Staff recommends APPROVAL, subject to conditions:	
22-0675-SDR1	Staff recommends APPROVAL, subject to conditions:	22-0675-WVR1

**** NOTIFICATION ****

NEIGHBORHOOD ASSOCIATIONS NOTIFIED 19

NOTICES MAILED 196 (by City Clerk)

PROTESTS 2

APPROVALS 2

**** CONDITIONS ****

22-0675-WVR1 CONDITIONS

Planning

1. Approval of and conformance to the Conditions of Approval for Site Development Plan Review (22-0675-SDR1) shall be required, if approved.
2. This approval shall be void two years from the date of final approval, unless exercised pursuant to the provisions of LVMC Title 19.16. An Extension of Time may be filed for consideration by the City of Las Vegas.
3. All necessary building permits shall be obtained and final inspections shall be completed in compliance with Title 19 and all codes as required by the Department of Building and Safety.
4. These Conditions of Approval shall be affixed to the cover sheet of any plan set submitted for building permit.
5. All City Code requirements and design standards of all City departments must be satisfied, except as modified herein.

22-0675-SDR1 CONDITIONS

Planning

1. Approval of and conformance to the Conditions of Approval for Waiver (22-0675-WVR1) shall be required, if approved.
2. This approval shall be void two years from the date of final approval, unless exercised pursuant to the provisions of LVMC Title 19.16. An Extension of Time may be filed for consideration by the City of Las Vegas.
3. All development shall be in conformance with the site plan, landscape plan, and building elevations, date stamped 12/08/22, except as amended by conditions herein.

Conditions Page Two
April 19, 2023 - City Council Meeting

4. Pursuant to Title 19 Appendix F Area 2 Development Standards, a Waiver from Title 19.06.110 is hereby approved to allow a zero-foot perimeter buffer along a portion of the east and west property lines where 10 feet is required.
5. Pursuant to Title 19 Appendix F Area 2 Development Standards, a Waiver from 19.06.110 is hereby approved to allow a zero-foot perimeter buffer along portions of the north and south property lines where six feet is required.
6. Pursuant to Title 19 Appendix F Area 2 Development Standards, a Waiver from Title 19.12 is hereby approved to allow six parking spaces where 12 spaces are required.
7. An Exception from Title 19.06.040 is hereby approved to allow zero 24-inch box trees within perimeter landscape buffers where 12 trees are required. [36-inch box size trees shall be planted.](#)
8. All necessary building permits shall be obtained and final inspections shall be completed in compliance with Title 19 and all codes as required by the Department of Building and Safety.
9. These Conditions of Approval shall be affixed to the cover sheet of any plan set submitted for building permit.
10. Pursuant to LVMC Title 19.08.040.G for commercial and industrial properties, a perimeter wall shall be constructed adjacent to any residential zoning district or property used solely for residential purposes. The wall or fence is intended to screen the commercial or industrial activity from the residential property, and shall be of a solid decorative material that is a minimum of six feet in height measured from the side of the commercial or industrial property. In no case shall the wall or fence exceed the overall height limitation applicable to the adjacent zoning district or property unless approved through a Variance or other applicable means. The overall height of a wall or fence shall be measured from the side with the greatest vertical exposure above finished grade.
11. All utility or mechanical equipment shall comply with the provisions of the Interim Downtown Las Vegas Development Standards, unless approved by a separate Waiver.
12. A technical landscape plan, signed and sealed by a Registered Architect, Landscape Architect, Residential Designer or Civil Engineer, must be submitted prior to or at the same time application is made for a building permit. A permanent underground sprinkler system is required, which shall be permanently maintained in a satisfactory manner; the landscape plan shall include irrigation specifications. Installed landscaping shall not impede visibility of any traffic control device.

Conditions Page Three
April 19, 2023 - City Council Meeting

13. A fully operational fire protection system, including fire apparatus roads, fire hydrants and water supply, shall be installed and shall be functioning prior to construction of any combustible structures.
14. Prior to the submittal of a building permit application, the applicant shall meet with Department of Planning staff to develop a comprehensive address plan for the subject site. A copy of the approved address plan shall be submitted with any future building permit applications related to the site.
15. All City Code requirements and design standards of all City Departments must be satisfied, except as modified herein.

Public Works

16. The sidewalk adjacent to this site shall meet Public Right-of-Way Accessibility Guidelines (PROWAG) in accordance with code requirements of Title 13.56.040 to the satisfaction of the City Engineer concurrent with development of this site. Grant any Pedestrian Access Easement needed to complete this requirement.
17. Landscape and maintain all unimproved right-of-way adjacent to this site. All landscaping and private improvements installed with this project shall be situated and maintained so as to not create sight visibility obstructions for vehicular traffic at all development access drives and abutting street intersections.
18. Submit a License Agreement for landscaping and private improvements in the Ninth Street public rights-of- way, if any, prior to the issuance of permits for these improvements. If requested by the City, the applicant shall remove property within the public right-of-way at the applicant's expense pursuant to the terms of the City's License Agreement. The installation and maintenance of all private improvements in the public right of way shall be the responsibility of the applicant and any successors in interest to the property and assigns pursuant to the terms of the License Agreement. Coordinate all requirements for the License Agreement with the Land Development Section of the Department of Building and Safety (702-229-4836).
19. Meet with the Flood Control Section of the Department of Public Works for assistance with establishing finished floor elevations and drainage paths for this site prior to submittal of construction plans, the issuance of any building or grading permits [or the submittal of a map for this site], whichever may occur first. Provide and improve all drainage ways as recommended.

**** STAFF REPORT ****

PROJECT DESCRIPTION

The applicant is seeking to construct a two-story, eight-unit multi-family residential development on 0.16 acres of undeveloped land on the east side of 9th Street, approximately 50 feet south of Wilson Avenue.

ISSUES

- A prior Site Development Plan Review (SDR-76888) was approved for a similar multi-family residential project on this site in 2019, which expired on 11/20/21.
- The submitted site plan indicates that three parking spaces back out into the 9th Street public right-of-way. As this site is located within Area 2 of the Downtown Las Vegas Overlay District, a Waiver of Title 19.08.110.C may be requested pursuant to Title 19 Appendix F.A.8 and F.C.2. Staff recommends approval of the requested Waiver (22-0675-WVR1).
- A Waiver is requested with the Site Development Plan Review to allow six parking spaces where 12 spaces are required for a multi-family residential development based on eight, one-bedroom units. Staff recommends approval of the requested Waiver.
- A Waiver is requested with the Site Development Plan Review to allow a zero-foot perimeter buffer along a portion of the east and west property line where 10 feet is required. Staff recommends approval of the requested Waiver.
- A Waiver is requested with the Site Development Plan Review to allow a zero-foot perimeter buffer along portions of the north and south property line where six feet is required. Staff recommends approval of the requested Waiver.
- An Exception is requested to allow no trees within perimeter landscape buffers where 12 trees are required. Staff approves the Exception.
- A public sidewalk is not required by the Department of Public Works, as this layout is consistent with neighboring properties along 9th Street. A pedestrian easement for a private sidewalk is required to be granted as a condition of approval.

ANALYSIS

The subject site is one of four undeveloped parcels on the same block. This neighborhood is predominately multi-family residential, with mostly duplexes and one- and two-story four plexes on 50-foot wide lots zoned R-3 (Medium Density Residential). This zoning district conforms to the current MXU (Mixed Use) designation on the parcel, which allows for a range of residential densities and zoning districts. The proposed density of this site is 50 units per acre, which defines the upper limit for projects in the R-3 zoning district.

Staff Report Page Two
April 19, 2023 - City Council Meeting

In 2019, a similar multi-family residential development was proposed for this site and was approved by the City Council (SDR-76888). However, permits for construction were not obtained within the required two-year approval period and the entitlement expired. Staff had recommended denial of SDR-76888, citing the lack of parking without consideration of future application of Form-Based Code parking requirements.

The site is located within the Downtown Las Vegas Area Plan of the Las Vegas 2050 Master Plan and the Cashman District as defined by the Vision 2045 Downtown Las Vegas Master Plan. According to the area plan, the Downtown area in the future must balance preservation in the historic neighborhoods with infill and redevelopment, with a focus on higher density mixed-use, transit-oriented development. The anticipated physical form of the built environment for this area is for compact development, with eventual regulation by a form-based code. The multi-family residential use is appropriate for this area, but in the future uses are expected to be less important than the character and vibe of the area. The site is located within 300 feet of Bonanza Road, which features a bus line.

The Downtown Master Plan encourages strategic infill, incentivizing development of vacant and underutilized properties within the urban core, which includes this site. Future development is focused on transportation hubs, which typically are catalysts for revitalization. Conceptually, this area is planned to remain residential with a transit hub envisioned nearby along Las Vegas Boulevard by the current Cashman complex. Higher density housing is promoted with the vision of creating a compact, walkable neighborhood connecting to the transit hub. The long-term vision for the Cashman area includes integrating a sports and entertainment venue into a mixed-use area.

Within the Downtown Las Vegas Overlay District, this site is located within Area 2, which is an expanded area subject to Title 19 development standards but is expected at a future date to be subject to the form-based code standards of Title 19.09. The anticipated standards are thus taken into consideration while reviewing the compatibility of a proposed development with the surrounding environment.

Access to the site is from 9th Street, a 78-foot public right-of-way of which only 60 feet is improved at this time. There are no sidewalks or amenity zones along the east side of the street. Access to three parking spaces is also provided from the rear alley. Three parking spaces are proposed in front of the proposed building that will require backing out into the street. Title 19.08.110.C requires that:

“All parking areas shall provide suitable maneuvering room so that all vehicles may enter an abutting street in a forward direction. The backing of a motor vehicle onto a public street from a parking area shall be prohibited, except for the following:

1. Existing commercial and industrial facilities parking areas not exceeding two spaces per property.

Staff Report Page Three
April 19, 2023 - City Council Meeting

In this case, the parking area is proposed, not existing, and exceeds two spaces.

2. Existing public and quasi-public use facilities not exceeding two spaces per property.”

This exception does not apply in this case.

Pursuant to Title 19 Appendix F, all development within Area 2 shall conform to Title 19 requirements. However, any deviation from Title 19 development standards that supports the City’s goals as expressed in the Vision 2045 Downtown Master Plan may only be granted by the City Council through approval of a Waiver. Staff supports the requested Waiver to allow backing out into the 9th Street right-of-way, as most properties along 9th Street already back out into the street. Many of the parking spaces on neighboring properties are partially located within the right-of-way. On the subject site, the three spaces backing out onto 9th Street are fully located onsite and are 20 feet long, but there is an additional 19 feet of unimproved right-of-way that may be used to maneuver vehicles into the travel lane.

The Department of Public Works is not requiring a public sidewalk on the east side of 9th Street adjacent to this site, as none currently exists to the north or south. Title 19.04.010 states that where a proposed development is adjacent to existing improvements, the Director of Public Works shall determine the extent to which it is appropriate to implement the standards outlined in Title 19.04 and approve, if necessary, designs for the transition from existing improvements to those that meet the standards in Title 19.04. A private sidewalk is proposed between the parking area and the building, for which a pedestrian easement should be granted.

The six parking spaces provided represents a 50 percent deviation from the Title 19 standard of 12 spaces based on the eight units proposed. As this site is within Area 2, consideration is given to future Form-Based Code parking standards, although they are not currently applied. The Form-Based Code standards only require 40 to 70 percent of the Title 19.12 parking requirement in this area, and the site is within proximity to a bus route; therefore, the 50 percent of spaces provided is considered to be appropriate for this site.

Some landscaping is provided on the perimeter; however, due to the provision of parking spaces along the front and rear property lines and sidewalks for pedestrian access along the side lot lines, portions of the perimeter landscape buffers are reduced to zero, with no trees provided. Trees have appropriately been located at the ends of each row of parking. The proposed landscaping materials adhere to the Southern Nevada Regional Planning Coalition Regional Plant List. Staff recommends approval of the requested Waiver, as it supports the type of development on this site and landscaping is provided wherever possible on the perimeter.

**Staff Report Page Four
April 19, 2023 - City Council Meeting**

The building façade will have Exterior Insulation Finishing System (EIFS) cladding (reinforced wall coating) and tile roof. The submitted floor plan depicts two levels with four one-bedroom units on each floor. Interior staircases are provided to reach the second floor units. The elevations provided indicate a building that is compatible with the multi-family residential buildings on neighboring lots.

According to the Traffic Engineering Section of the Department of Public Works, this project is expected to add an additional 54 trips per day on 9th Street, Wilson Avenue, Bonanza Road and Las Vegas Boulevard. Currently, Bonanza Road is at about 75 percent of capacity and Las Vegas Boulevard is at about 74 percent of capacity. With this project, these capacities are expected to be unchanged. Counts are not available for 9th Street or Wilson Avenue in this vicinity, but they are believed to be under capacity. Based on Peak Hour use, this development will add into the area roughly four additional peak hour trips, or about one every 15 minutes.

The Clark County School District (CCSD) has commented on the impact future development might have on the three levels of schools in the area. CCSD projects that approximately three additional primary and secondary school students would be generated by the proposed development on this site. According to CCSD, Squires Elementary School and Smith Middle School are each under capacity for the 2022-23 school year. Rancho High School is currently about 29 percent over capacity.

The site provides multi-family residential housing at a scale that is comparable to adjacent properties. As proposed, this development promotes the goals of the Vision 2045 Downtown Master Plan as well as the Downtown Las Vegas area plan of the Las Vegas 2050 Master Plan. Staff therefore recommends approval of these requests, subject to conditions.

FINDINGS (22-0675-WVR1)

There are no sidewalks adjacent to the subject site and adjacent properties, and other properties along the east side of 9th Street have a similar parking configuration as proposed by this project. Development of this project would have no negligible effect on traffic flows in this area, as indicated by Department of Public Works traffic projections. Staff therefore recommends approval of the requested Waiver to allow backing of vehicles into a public street.

FINDINGS (22-0675-SDR1)

In order to approve a Site Development Plan Review application, per Title 19.16.100(E) the Planning Commission and/or City Council must affirm the following:

1. **The proposed development is compatible with adjacent development and development in the area;**

The east side of 9th Street south of Wilson Avenue consists of a mix of one and two-story apartment buildings on small R-3-zoned lots with no sidewalks. The buildings are set back from the street, allowing for parking in the front yard. The proposed two-story multi-family residential development has similar characteristics to and shows compatibility with the adjacent development.

2. **The proposed development is consistent with the General Plan, this Title, and other duly-adopted city plans, policies and standards;**

The proposed development is consistent with the MXU (Mixed Use) General Plan land use plan designation and R-3 zoning standards. Reductions in landscape buffer widths and parking, and providing a parking area require Waivers of Title 19 standards, which are allowed in Downtown Las Vegas Overlay District Area 2. The type of development proposed conforms to policies recommended by the Las Vegas 2050 Master Plan. Staff therefore supports these Waiver requests.

3. **Site access and circulation do not negatively impact adjacent roadways or neighborhood traffic;**

Site access onto 9th Street is by a proposed parking area with three spaces. Alternate access is provided from the rear alley to three additional parking spaces. The Department of Public Works acknowledges that neighboring properties along 9th Street have a similar access and parking layout and projects only a marginal increase in traffic on area streets.

4. **Building and landscape materials are appropriate for the area and for the City;**

The proposed Exterior Insulation Finish System (EIFS) façade is compatible with the existing building materials of surrounding developments. The proposed landscape materials conform to the Southern Nevada Regional Planning Coalition Regional Plant List.

5. **Building elevations, design characteristics and other architectural and aesthetic features are not unsightly, undesirable, or obnoxious in appearance; create an orderly and aesthetically pleasing environment; and are harmonious and compatible with development in the area;**

The submitted building elevation design characteristics are not unsightly, undesirable or obnoxious in appearance. The proposed EIFS façade is compatible with existing development in the area.

Staff Report Page Six
 April 19, 2023 - City Council Meeting

6. **Appropriate measures are taken to secure and protect the public health, safety and general welfare.**

The proposed development will be subject to building permit review and inspection, thereby ensuring the protection of public health, safety and general welfare.

BACKGROUND INFORMATION

<i>Related Relevant City Actions by Planning, Fire, Bldg., etc.</i>	
09/05/18	The City Council approved a request for a General Plan Amendment (GPA-73547) from PF (Public Facilities) to MXU (Mixed Use) at 638 North 9 th Street. The Planning Commission and staff recommended approval.
11/20/19	The City Council approved a request for a Site Development Plan Review (SDR-76888) for a proposed eight-unit multi-family residential development with Waivers to the Downtown Las Vegas Appendix F parking and landscaping requirements on 0.16 acres at 638 North 9th Street. The Planning Commission recommended approval; staff recommended denial. The approval expired 11/20/21.
02/14/23	<p>The Planning Commission voted (7-0) to recommend APPROVAL of the following Land Use Entitlement project requests on 0.16 acres on the east side of 9th Street, approximately 50 feet south of Wilson Avenue (APN 139-26-410-012), R-3 (Medium Density Residential) Zone, Ward 5 (Crear).</p> <p>22-0675-WVR1 - WAIVER - TO ALLOW THE BACKING OF MOTOR VEHICLES ONTO A PUBLIC STREET FROM A PARKING AREA WHERE SUCH IS PROHIBITED</p> <p>22-0675-SDR1 - SITE DEVELOPMENT PLAN REVIEW - FOR A PROPOSED TWO-STORY, EIGHT-UNIT MULTI-FAMILY RESIDENTIAL DEVELOPMENT WITH WAIVERS OF APPENDIX F INTERIM DOWNTOWN LAS VEGAS DEVELOPMENT STANDARDS FOR AREA 2</p>

<i>Most Recent Change of Ownership</i>	
05/11/18	A deed was recorded for a change in ownership.

Staff Report Page Seven
 April 19, 2023 - City Council Meeting

Related Building Permits/Business Licenses	
02/05/20	Civil Improvement Plans (L20-00226) were processed for offsite improvements for an 8-unit multi-family building at 638 North 9th Street. A permit has not been issued. The plans do not have final approval.
02/06/20	Application (C20-00640) was made for a building permit for an 8-unit multi-family building with onsite improvements at 638 North 9th Street. A permit has not been issued.

Pre-Application Meeting	
11/17/22	A pre-application meeting was held with the applicant to discuss submittal requirements for a Site Development Plan Review application. It was noted that similar plans will be submitted as for the previously approved project, which has now expired.

Neighborhood Meeting	
A neighborhood meeting was not required, nor was one held.	

Field Check	
01/05/23	The subject site is vacant with trash and debris on the north and south sides. A vehicle was parked on the lot at the time of inspection. There is an existing curb, fire hydrant and curb cut adjacent to this site, but no sidewalk, which is consistent for properties along the east side of 9th Street.

Details of Application Request	
Site Area	
Net Acres	0.16

Staff Report Page Eight
 April 19, 2023 - City Council Meeting

<i>Surrounding Property</i>	<i>Existing Land Use Per Title 19.12</i>	<i>Planned or Special Land Use Designation</i>	<i>Existing Zoning District</i>
Subject Property	Undeveloped	MXU (Mixed Use)	R-3 (Medium Density Residential)
North	Multi-Family Residential	PF (Public Facilities)	R-3 (Medium Density Residential)
South	Multi-Family Residential	PF (Public Facilities)	R-3 (Medium Density Residential)
East	Multi-Family Residential	PF (Public Facilities)	R-3 (Medium Density Residential)
West	Government Facility	PF (Public Facilities)	C-V (Civic)

<i>Master and Neighborhood Plan Areas</i>	<i>Compliance</i>
Las Vegas 2050 Master Plan Area: Downtown Las Vegas	Y
Vision 2045 Downtown Las Vegas Master Plan (Cashman District)	Y
Downtown North Land Use Plan	Y
<i>Special Area and Overlay Districts</i>	<i>Compliance</i>
A-O (Airport Overlay) District (200 Feet)	Y
DTLV-O (Downtown Las Vegas Overlay) District – Area 2	N
<i>Other Plans or Special Requirements</i>	<i>Compliance</i>
Trails	N/A
Las Vegas Redevelopment Plan Area – Area 1	Y
Interlocal Agreement	N/A
Project of Significant Impact (Development Impact Notification Assessment)	N/A
Project of Regional Significance	N/A

DEVELOPMENT STANDARDS

Pursuant to Title 19 Appendix F and Title 19.06, the following standards apply:

Standard	Required/Allowed	Provided	Compliance
Min. Lot Size	6,500 SF	7,000 SF	Y
Min. Lot Width	N/A	50 Feet	N/A
Min. Setbacks			
• Front	10 Feet	25 Feet	Y
• Side	5 Feet	6 Feet	Y
• Rear	20 Feet	22 Feet	Y
Max. Lot Coverage	N/A	39 %	N/A
Max. Building Height	5 Stories/55 Feet	2 Stories/ 24 Feet*	Y
Trash Enclosure	Screened, Gated, w/ a Roof or Trellis	Screened, Gated, w/ a Roof or Trellis	Y
Mech. Equipment	Screened	Screened	Y

*Defined per Title 19.18 as the midpoint between the base and peak of a sloped roof.

Pursuant to Title 19.06, the following standards apply:

Landscaping and Open Space Standards				
Standards	Required		Provided	Compliance
	Ratio	Trees		
Buffer Trees:				
• North	1 Tree / 20 Linear Feet	6 Trees	0 Trees	N
• South	1 Tree / 20 Linear Feet	6 Trees	0 Trees	N
• East	1 Tree / 20 Linear Feet	0 Trees	0 Trees	Y
• West	1 Tree / 20 Linear Feet	0 Trees	0 Trees	Y
TOTAL PERIMETER TREES		12 Trees	0 Trees	N*
Parking Area Trees	1 Tree / 6 Uncovered Spaces, plus 1 tree at the end of each row of spaces	4 Trees	4 Trees	Y
LANDSCAPE BUFFER WIDTHS				
Min. Zone Width				
• North	6 Feet		0 Feet	N*
• South	6 Feet		0 Feet	N*
• East	0 Feet (alley access)		0 Feet	Y
• West	10 Feet		0 Feet	N*
Wall Height	6 to 8 Feet Adjacent to Residential		Not Indicated	By Condition

*An Exception is required to allow a reduction in the number of trees provided in the perimeter buffers. See Exception table below.

Staff Report Page Ten
April 19, 2023 - City Council Meeting

***Waivers are requested to allow a reduction in the width of the perimeter landscape buffers. See Waiver table below.*

Street Name	Functional Classification of Street(s)	Governing Document	Actual Street Width (Feet)	Compliance with Street Section
9th Street	Local Street	Title 13	60	Y

Parking Requirement - Downtown (Areas 1-3)							
Use	Gross Floor Area or Number of Units	Required		Provided		Compliance	
		Parking Ratio	Parking		Parking		
			Regular	Handi-capped	Regular	Handi-capped	
Multi-Family Residential:							
1 BR	8 units	1.25 space per unit	10				
Guest	8 units	1 space per 6 units	2				
TOTAL SPACES REQUIRED (unweighted)			12				
TOTAL SPACES REQUIRED (weighted requirement, see below)			5-9		6		Y
Regular and Handicap Spaces Required			11	1	5	1	N*
Downtown Form Based Code Parking Standards - Title 19.09.100.G							
Parking Standards High Load – Zone 3			Between 40% and 70%		50%		Y

Projects located within the Downtown Las Vegas Overlay District may be evaluated based on a weighted parking requirement as detailed in Title 19.09.100. This table compares the Title 19.12 parking requirements for this project with the weighted requirement in Title 19.09, but is not determinative of code conformance. Projects located within the Downtown Las Vegas Overlay (Area 1) are not subject to the automatic application of parking requirements. However, the above table should be used to illustrate the requirements of an analogous project in another location in the City.

***A Waiver is requested. See Waiver table below.*

Staff Report Page Eleven
April 19, 2023 - City Council Meeting

<i>Waivers</i>		
<i>Requirement</i>	<i>Request</i>	<i>Staff Recommendation</i>
19.06.110 - 10-foot perimeter landscape buffer along ROW	To allow zero-foot perimeter buffer along a portion of the east and west property line	Approval
19.06.110 - 6-foot perimeter landscape buffer along interior lot lines	To allow zero-foot perimeter buffer along portions of the north and south property line	Approval
19.12.070 - 12 parking spaces based on Multi-Family Residential use	To allow six parking spaces	Approval

<i>Exceptions</i>		
<i>Requirement</i>	<i>Request</i>	<i>Staff Recommendation</i>
19.06.040 - (1) 24" box tree at 20-foot intervals within perimeter landscape buffers (total of 12 required)	To allow zero trees within perimeter landscape buffers	Approval