



**METROPOLITAN DEVELOPMENT COMMISSION  
HEARING EXAMINER**

**MARCH 14, 2024**

<b>Case Number:</b>	2024-APP-003
<b>Property Address:</b>	1550 County Line Road and 8615 Shelby Street
<b>Location:</b>	Perry Township; Council District #23
<b>Petitioner:</b>	Community Health Network & Community Health Network Foundation, Inc.
<b>Current Zoning:</b>	HD-2 (FW)(FF)
<b>Request:</b>	Hospital district Two Approval to provide for a 58,576-square-foot expansion of the existing Cancer Center and additional parking.
<b>Current Land Use:</b>	Hospital Campus
<b>Staff Recommendations:</b>	Approval, subject to commitments.
<b>Staff Reviewer:</b>	Kathleen Blackham, Senior Planner

**PETITION HISTORY**

This is the first public hearing on this petition

**STAFF RECOMMENDATION**

Approval, subject to the following commitments being reduced to writing on the Commission's Exhibit "B" forms at least three days prior to the MDC hearing:

1. Development of the site shall be in substantial compliance with the site plan and elevations file dated February 12, 2024.
2. A tree inventory, tree assessment and preservation plan prepared by a certified arborist shall be submitted for Administrator Approval prior to preliminary plat approval and prior to any site preparation activity or disturbance of the site. This plan shall, at a minimum: a) indicate proposed development; b) delineate the location of the existing trees, c) characterize the size and species of such trees, d) indicate the wooded areas to be saved by shading or some other means of indicating tree areas to be preserved and e) identify the method of preservation (e.g. provision of snow fencing or staked straw bales at the individual tree's dripline during construction activity). All trees proposed for removal shall be indicated as such.

**PETITION OVERVIEW**

This approximately 33.59-acre site, zoned HD-2 (FW)(FF) is developed with a medical office building and parking currently functioning as cancer center. It is surrounded by multi-family dwellings to the north,

zoned D-P; medical offices to the south, zoned HD-2; parking lot to the east, zoned HD-1; and vacant land to the west, zoned HD-2.

## **HOSPITAL DISTRICT TWO APPROVAL**

This request would provide for Hospital District Two Approval to provide for a 58,576-square foot addition to the cancer center building and additional parking.

Land in the development plan districts is subject to the following site and development requirements. In review of the proposed Site and Development Plan, the Commission must assess whether the Site and Development Plan, proposed use, buildings and structures must:

- a. Be so designed as to create a superior land development plan, in conformity with the Comprehensive Plan;
- b. Create and maintain a desirable, efficient and economical use of land with high functional and aesthetic value, attractiveness and compatibility of land uses, within the development plan district and with adjacent uses;
- c. Provide sufficient and adequate multi-modal access, such as parking and loading areas, transit provisions, and bicycle facilities;
- d. Integrate a multi-modal transportation network using active and passive traffic control with the existing and planned public streets and interior roads;
- e. Provide adequately for sanitation, drainage and public utilities in a sustainable, low-impact manner;
- f. Allocate adequate sites for all uses proposed - the design, character, grade, location and orientation thereof to be appropriate for the uses proposed, logically related to existing and proposed topographical and other conditions, and consistent with the Comprehensive Plan; and
- g. Provide pedestrian accessibility and connectivity, which may be paths, trails, sidewalks, or combination thereof. Pedestrian accessibility to available public transit must be provided. Sidewalks along eligible public streets consisting of the walkway and any curb ramps or blended transitions must be provided. If sidewalks are required to be installed, the Administrator or the Commission must be guided by the provisions of Section 744-304 for the installation of sidewalks.

“The Commission may consider and act upon any such proposed use and Site and Development Plan, approve the same in whole or in part, and impose additional development standards, requirements, conditions, or commitments thereon at any public hearing of the Commission. The Commission must, also make written findings concerning any decision to approve or disapprove a Site and Development Plan.”

The Comprehensive Plan recommends regional special use for the eastern portion of the site where the existing building and proposed expansion would be located. This portion of the site would be consistent with the Plan recommendation. The proposed parking lot located on the western portion of the site has a recommendation of suburban neighborhood typology.

Despite the conflict with the Comprehensive Plan related to the suburban neighborhood typology recommendation, staff believes the proposed expansion would be acceptable with minimal impact on surrounding land uses. Staff would note that the floodplain of Buffalo Creek would provide an appropriate buffer to the residential land uses to the west along Shelby Street. Furthermore, the required stream protection corridor would limit development within 50 feet of the top of the creek bank.

The proposed building 58,576 square-foot addition would be an expansion along the west façade of the existing building and would encroach into the existing parking lot. Due to the location of and square footage of the expansion, additional parking would be provided on the western portion of the site, a portion of which fronts on Shelby Street.

Exterior materials of the proposed building expansion would consist of glazing, metal panels and brick to match those materials on the existing building.

The additions would allow for expanded patient and staff services while maintaining the aesthetic value, attractiveness, and compatibility of the hospital complex, as well as surrounding land uses. Staff, therefore, recommends approval of the proposed expansion of the existing building and additional parking.

#### Overlays

This site is also located within an overlay, specifically the Environmentally Sensitive Areas (ES) Overlay. “Overlays are used in places where the land uses that are allowed in a typology need to be adjusted. They may be needed because an area is environmentally sensitive, near an airport, or because a certain type of development should be promoted. Overlays can add uses, remove uses, or modify the conditions that are applied to uses in a typology.”

The Environmentally Sensitive Areas (ES) Overlay is intended for areas containing high quality woodlands, wetlands, or other natural resources that should be protected. The purpose of this overlay is to prevent or mitigate potential damage to these resources caused by development. This overlay is also appropriate for areas that present an opportunity to create a new environmental asset. This overlay is not intended for the preservation of open space.

The western portion of the site (fronting on Shelby Street) is located within the floodway and floodway fringe of Buffalo Creek. Tributary of Fountain Creek is located along the eastern boundary of this site, but it lies within the 500-year floodplain that is unregulated.

#### Floodway / Floodway Fringe

This site has a secondary zoning classification of a Floodway (FW) and Floodway Fringe (FF). The Floodway (FW) is the channel of a river or stream and those portions of the floodplains adjoin the channels which are reasonably required to efficiently carry and discharge the peak flood flow of the

base flood of any river or stream. The Floodway Fringe (FF) is the portion of the regulatory floodplain that is not required to convey the 100-year frequency flood peak discharge and lies outside of the floodway.

The purpose of the floodway district is to guide development in areas identified as a floodway. The Indiana Department of Natural Resources (IDNR) exercises primary jurisdiction in the floodway district under the authority of IC 14-28-1.

The designation of the FF District is to guide development in areas subject to potential flood damage, but outside the Floodway (FW) District. Unless otherwise prohibited, all uses permitted in the primary zoning district (HD-2 in this request) are permitted, subject to certain development standards of the Flood Control Secondary Zoning Districts Ordinance.

Stream Protection Corridor

Stream Protection Corridor

A stream protection corridor consists of a strip of land, extending along both sides of all streams, with measurements taken from the top of the bank on either side. The width of the corridor is based upon whether the stream is designated as a Category One or Category Two. Category One streams have a corridor width of 60 feet in the compact context area and 100 feet in the metro context area. Category Two streams have a corridor width of 25 feet in the compact context area and 50 feet in the metro context area.

The vegetative target for the Stream Protection Corridor is a variety of mature, native riparian tree and shrub species that can provide shade, leaf litter, woody debris, and erosion protection to the stream, along with appropriate plantings necessary for effective stream bank stabilization.

The Stream Protection Corridor is defined as:

“A vegetated area, including trees, shrubs, and herbaceous vegetation, that exists or is established to protect a stream system, lake, or reservoir, and where alteration is strictly limited. Functionally, stream protection corridors provide erosion control, improve water quality (lower sedimentation and contaminant removal) offer flood water storage, provide habitat, and improve aesthetic value.”

Stream is defined as “a surface watercourse with a well-defined bed and bank, either natural or artificial that confines and conducts continuous or periodic flowing water.”

Stream Bank is defined as “the sloping land that contains the stream channel and the normal flows of the stream.”

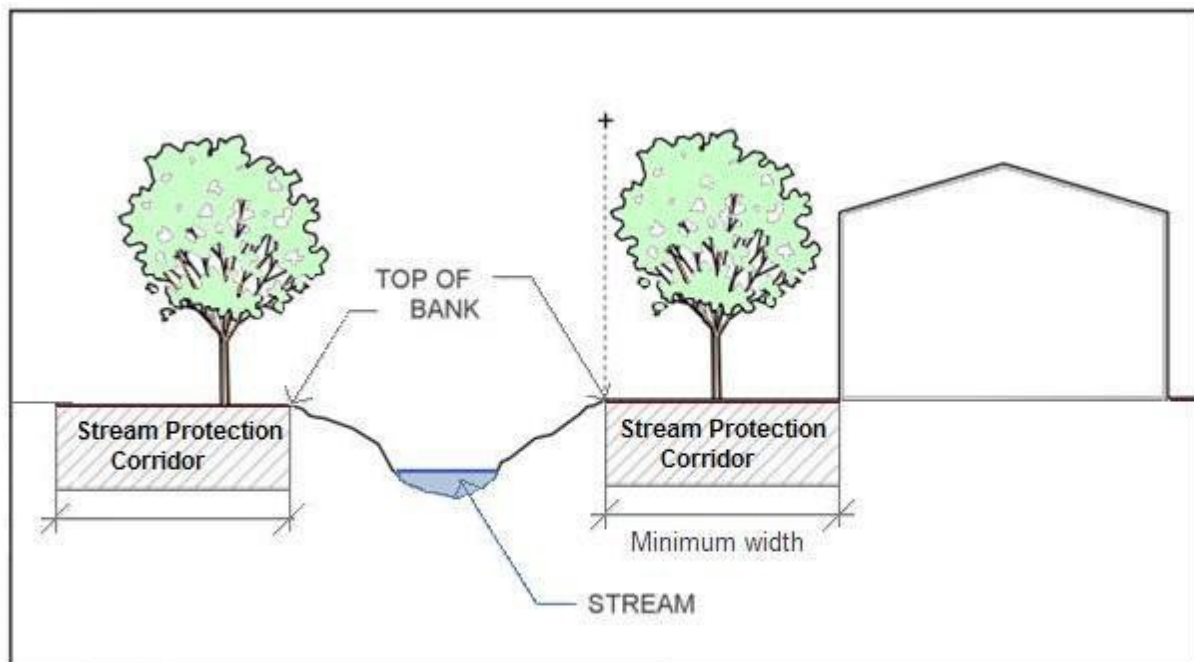
Stream Channel is defined as “part of a watercourse that contains an intermittent or perennial base flow of groundwater origin.”

There are two types of categories of Streams: Category One Streams and Category Two Streams. Category One Stream is defined as: “A perennial stream that flows in a well-defined channel throughout most of the year under normal climatic conditions. Some may dry up during drought periods or due to excessive upstream uses. Aquatic organism such as some fish are normally present and easily found in these streams. The Category One Streams are listed in Table 744-205-2: Category One Streams.”

A Category Two Stream is defined as: “An intermittent stream that flows in a well-defined channel during wet seasons of the year but not necessarily for the entire year. These streams generally exhibit signs of water velocity sufficient to move soil, material, litter, and fine debris. Aquatic organisms, such as fish, are often difficult to find or not present at all in these streams. These streams are identified on the United States Geological Survey (USGS) topographic maps and on the Department of Natural Resources Conservation Service (NRCS) soils maps.”

There are 34 Category One streams listed in the Ordinance. The stream protection corridor is a strip of land on both sides of the stream whose width varies according to whether it is within the Compact or Metro Context Area and whether it is a Category One or Category Two Stream.

This portion of Buffalo Creek lies within the Metro Context Area and is located along the western portion of the site. It is designated as a Category Two stream requiring a 50-foot-wide stream protection corridor on both sides of the stream, as measured parallel from the top of the bank. Top of the bank is not defined by the Ordinance, other than by Diagram UU, Stream Protection Corridor Cross-section, as shown below:



**Stream Protection Corridor**



Tree Preservation / Heritage Tree Conservation

There are significant amounts of natural vegetation and trees located on the western undeveloped portion of the site. Due to their inherent ecological, aesthetic, and buffering qualities, the maximum number of these existing trees should be preserved on the site.

All development shall be in a manner that causes the least amount of disruption to the trees.

A tree inventory, tree assessment and preservation plan prepared by a certified arborist shall be submitted for Administrator Approval prior to preliminary plat approval and prior to any site preparation activity or disturbance of the site. This plan shall, at a minimum: a) indicate proposed development, b) delineate the location of the existing trees, c) characterize the size and species of such trees, d) indicate the wooded areas to be saved by shading or some other means of indicating tree areas to be preserved and e) identify the method of preservation (e.g. provision of snow fencing or staked straw bales at the individual tree's dripline during construction activity). All trees proposed for removal shall be indicated as such.

If any of the trees are heritage trees that would be impacted, then the Ordinance requires that the Administrator, Urban Forester or Director of Public Works determine whether the tree(s) would be preserved or removed and replaced.

The Ordinance defines “heritage tree” as a tree over 18 inches Diameter at Breast Height (DBH) and one of the Heritage tree species. Heritage tree species include: Sugar Maple (*Acer saccharum*), Shagbark Hickory (*Carya ovata*), Hackberry (*Celtis occidentalis*), Yellowwood (*Cladrastus kentukea*), American Beech (*Fagus grandifolia*), Kentucky Coffeetree (*Gymnocladus dioica*), Walnut or Butternut (*Juglans*), Tulip Poplar (*Liriodendron tulipifera*), Sweet Gum (*Liquidambar styraciflua*), Black Gum (*Nyssa sylvatica*), American Sycamore (*Platanus occidentalis*), Eastern Cottonwood (*Populus deltoides*), American Elm (*Ulmus americana*), Red Elm (*Ulmus rubra*) and any oak species (*Quercus*, all spp.)

The Ordinance also provides for replacement of heritage trees if a heritage tree is removed or dies within three years of the Improvement Location issuance date. See Exhibit A, Table 744-503-3: Replacement Trees.

**GENERAL INFORMATION**

<b>Existing Zoning</b>	HD-2	
<b>Existing Land Use</b>	Medical office / parking / undeveloped land	
<b>Comprehensive Plan</b>	Regional special use / suburban neighborhood	
<b>Surrounding Context</b>	<b>Zoning</b>	<b>Land Use</b>
North:	D-P	Multi-family dwellings
South:	HD-2	Medical offices
East:	HD-1	Parking lot
West:	HD-2	Vacant land

Thoroughfare Plan		
County Line Road	Primary arterial	Existing 115-foot right-of-way and proposed 102-foot right-of-way
Shelby Street	Primary collector	Existing and proposed 90-foot right-of-way
<b>Context Area</b>	Metro	
<b>Floodway / Floodway Fringe</b>	Yes	
<b>Overlay</b>	Yes. Environmentally Sensitive Area (ES)	
<b>Wellfield Protection Area</b>	No	
<b>Site Plan</b>	February 12, 2024	
<b>Site Plan (Amended)</b>	N/A	
<b>Elevations</b>	February 12, 2024	
<b>Elevations (Amended)</b>	N/A	
<b>Landscape Plan</b>	February 12, 2024	
<b>Findings of Fact</b>	February 12, 2024	
<b>Findings of Fact (Amended)</b>	N/A	
<b>C-S/D-P Statement</b>	N/A	

**COMPREHENSIVE PLAN ANALYSIS**

**Comprehensive Plan**

- The Comprehensive Land Use Plan (2018) recommends regional special use for the eastern portion of the site and suburban neighborhood for the western portion of the site.
- Regional Special Use “provides for public-semi-public and private land uses that serve a specific institutional purpose for a significant portion of the county. Examples are large scale, generally stable institutional uses such as cemeteries, hospitals, universities, high school, government complexes, large museums, the Indiana State Fairgrounds, and the Indianapolis Motor Speedway.”
- “The Suburban Neighborhood typology is predominantly made up of single-family housing, but is interspersed with attached and multifamily housing where appropriate. This typology should be supported by a variety of neighborhood-serving businesses, institutions, and amenities. Natural Corridors and natural features such as stream corridors, wetlands, and woodlands should be treated as focal points or organizing systems for development. Streets should be well-connected and amenities should be treated as landmarks that enhance navigability of the development. This typology generally has a residential density of 1 to 5 dwelling units per acre, but a higher density is recommended if the development is within a quarter mile of a frequent transit line, greenway, or park.”

### Pattern Book / Land Use Plan

- The Pattern Book lays out a land use classification system that guides the orderly development of the county, protects the character of neighborhoods, and serves as a policy guide for development or redevelopment of a site.

There are no guidelines or recommendations related to the regional special use non-typology land use but the following elements relate to the suburban neighborhood typology recommended for the western portion of the site:

*Conditions for All Land Use Types*

- All land use types except small-scale parks and community farms/gardens in this typology must have adequate municipal water and sanitary sewer.
- All development should include sidewalks along the street frontage.
- In master-planned developments, block lengths of less than 500 feet, or pedestrian cut-throughs for longer blocks, are encouraged.”

### Red Line / Blue Line / Purple Line TOD Strategic Plan

- Not Applicable to the Site.

### Neighborhood / Area Specific Plan

- Not Applicable to the Site.

### Infill Housing Guidelines

- Not Applicable to the Site.

### Indy Moves

(Thoroughfare Plan, Pedestrian Plan, Bicycle Master Plan, Greenways Master Plan)

- The Marion County Thoroughfare Plan (2019) “is a long-range plan that identifies the locations classifications and different infrastructure elements of roadways within a defined area.”
- The following listed items describes the purpose, policies and tools:



- Classify roadways based on their location, purpose in the overall network and what land use they serve.
- Provide design guidelines for accommodating all modes (automobile, transit, pedestrians, bicycles) within the roadway.
- Set requirements for preserving the right-of-way (ROW)
- Identify roadways for planned expansions or new terrain roadways
- Coordinate modal plans into a single linear network through its GIS database

## ZONING HISTORY

**2019-APP-001; 1550 East County Line Road**, requested Hospital District Two Approval to provide for building additions and accessory site modifications to an existing cancer center, **approved**.

**2018-APP-019; 1402, 1502 and 1550 East County Line Road**, requested Hospital District One Approval to provide for a 7,000-square foot addition to the main hospital, with modifications to the adjoining parking lot and pedestrian areas, **approved**.

**2017-APP-020; 1550 (1440 – building) East County Line Road** requested Hospital District-Two Approval to provide for a wall sign, **approved**.

**2014-APP-002 / 2014-VAR-002, 1550 (1440-building) East County Line Road**, requested Hospital District Two approval for three freestanding signs and a four wall signs and a variance of development standards of the Sign Regulations to provide for a 4.5-foot-tall sign within 170 feet of a protected district and two freestanding signs exceeding the permitted height and square footage, **approved and granted**.

**2012-APP-016; 1350 East County Line Road**, requested HD-2 approval to provide for the construction of a 57,500-square foot medical office building, **approved**.

## VICINITY

**2012-APP-2012; 1380 East County Line Road (south of site)**, requested Hospital District Two Approval to provide for a 10-foot tall, 46.25-square foot pylon sign, **approved**.

**2010-APP-024; 1380 East County Line Road (abutting site to south)**, requested Hospital District Two Approval to provide for a 16,773-square foot addition to an existing skilled nursing facility and to provide for additional off-street parking, **approved**.

**2007-APP-186; 1402 and 1550 East County Line Road**, requested Hospital district One and Hospital District Two approval to provide for a parking lot expansion with 317 parking spaces and to provide for an approximately 93,500-square foot, temporary gravel construction staging area for a period of 18 months, **approved**.

**2005-APP-837 / 2005-VAR-837; 1402 and 1550 East County Line Road**, requested Hospital district One approval to provide for a freestanding sign along U.S. Highway 31 and building identification signs for the Indiana Surgery Center and a variance of development standards of the Sign Regulations to provide for a 20-foot tall, 200-square foot illuminated pylon sign located five feet from a dwelling district, **approved and granted**.

**2005-APP-075, 1402 and 1550 East County Line Road**, requested Hospital District-One Approval to provide for the expansion of the current parking lot, adding 166 new parking spaces, **approved**.



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**2005-ZON-103, 8616 U.S. Highway 31 South**, requested rezoning of 0.58 acre, being the D-A District, to the HD-1 classification to provide for the construction of an access drive from U.S. Highway 31 South to Community Hospital south, **approved**.

**2002-APP-029, 1402 East County Line Road**, requested HD-1 Approval to provide for the construction of a two-story, 28,300-square foot cardiovascular center, **approved**.

**2002-VAR-849, 1402 East County Line Road**, requested a variance of development standards of the Sign Regulations to provide for two, four-foot tall, 16-square foot direction signs, (maximum 2.5 feet in height, six square feet in area permitted) and a .6-foot tall, 1-3-square foot directional sign (maximum 2.5 feet in height permitted), **approved**.

**2001-APP-090, 1402 East County Line Road**, requested HD-1 Approval to provide for the construction of 52-off street parking spaces and eight handicap spaces, and a wet pond, **approved**.

**2001-APP-089, 1550 East County Line Road**, requested HD-1 Approval to provide for the construction of a three-story addition to the existing Indiana Surgery Center, with an ambulatory surgery center, medical office, and 278 off-street parking spaces, **approved**.

**95-AP-42, 1340-1350 East County Line Road**, requested HD-2 Approval for a sign program consisting of two 32-square foot, single-faced ground sign directories and multiple wall signs with individual, non-illuminated, letters for each tenant space within an existing office complex, **approved**.

**95-AP-23, 1380 East County Line Road**, requested HD-2 Approval to provide for the construction of a 1,500-square foot storage building for an existing nursing home, **approved**.

**94-AP-125, 1402 East County Line Road**, requested HD-1 Approval to provide for improvements to the Community Hospital South Campus, including the expansion of the surgical center and related offices, on the first, second, and third floor, moving and expansion of existing parking areas and signs previously approved by petition 90-AP-40, **approved**.

**93-AP-135, 1402 East County Line Road**, requested HD-1 Approval to provide for the construction of a 10,000-square foot emergency services addition and renovation, **approved**.

**93-AP-87, 1550 East County Line Road**, requested HD-1 Approval to provide for two non-illuminated wall signs constructed of plate aluminum, **approved**.

**91-AP184, 1402 East County Line Road**, requested HD-1 Approval to provide for an addition to the fourth and fifth floor, a boiler room addition, and expansion of parking, **approved**.

**90-AP-40, 1402 East County Line Road**, requested HD-1 and HD-2 Approval to provide for a sign program for the hospital, **approved**.



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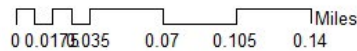
**90-V1-50, 1402 East County Line Road**, requested a variance of development standards of the Sign Regulations to permit a sign program for the hospital with signs in excess of height, number, and size, **approved**.

**2012-APP-2012; 1380 East County Line Road (south of site)**, requested Hospital District Two Approval to provide for a 10-foot tall, 46.25-square foot pylon sign, **approved**.

**2010-APP-024; 1380 East County Line Road (abutting site to south)**, requested Hospital District Two Approval to provide for a 16,773-square foot addition to an existing skilled nursing facility and to provide for additional off-street parking, **approved**.

**87-Z-10; 1350 East County Line Road (includes subject site)**, requested rezoning of 24 acres from HD-1 to HD-2, **approved**.

EXHIBITS



Petition Number \_\_\_\_\_

**METROPOLITAN DEVELOPMENT COMMISSION  
OF MARION COUNTY, INDIANA  
PETITION FOR UNIVERSITY QUARTER ONE/TWO APPROVAL  
PETITION FOR PARK DISTRICT ONE/TWO APPROVAL  
PETITION FOR HOSPITAL DISTRICT ONE/TWO APPROVAL**

**FINDINGS OF FACT**

The Metropolitan Development Commission finds that the site and development plan file-dated \_\_\_\_\_, 20\_\_\_\_

A. Has been designed to create a superior land development plan, in conformity with the Comprehensive Plan because:

This proposed expansion of the Community Health Network MD Anderson Cancer Center is part of a major hospital campus. Such use is compatible with nearby existing land uses, which are predominantly HD-1 and HD-2, and in conformity with the land uses suggested for such area under the Comprehensive Plan of Marion County, Indiana.

B. Creates and maintains a desirable, efficient and economical use of land with high functional and aesthetic value, attractiveness and compatibility of land uses, within the development plan district and with adjacent uses because:

The expansion of the Community Health Network MD Anderson Cancer Center and expansion of the surface parking area onto the parcel to the west is the most efficient and economical use of the land. The design and aesthetics of the expanded Community Health Network MD Anderson Cancer Center, in conjunction with the extensive new landscaping plan, will enhance the aesthetic value of the site and the surrounding hospital facilities.

C. Provides sufficient and adequate multi-modal access, such as parking and loading areas, transit provisions, and bicycle facilities because:

Sufficient access to the expanded Community Health Network MD Anderson Cancer Center is provided via the existing access from US31 and E. County Line Road. Proposed expansion of the surface parking area will provide an increase from 288 parking spaces to 497 parking spaces, including 47 ADA compliant parking spaces.

D. Integrates a multi-modal transportation network using active and passive traffic control with the existing and planned public streets and interior roads because:

The expanded parking area will continue to be easily accessible from Bipin Way, which has access to both US31 and County Line Road, and IndyGo bus service via IndyGo Bus Route 31.

E. Provides adequately for sanitation, drainage, and public utilities in a sustainable, low-impact manner because:

The Community Health Network MD Anderson Cancer Center will utilize both the existing retention pond located to the south of the existing building and parking area, as well as a retention pond to the north of the expanded surface parking area.



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F. Allocates adequate sites for all uses proposed, - the design, character, grade, location, and orientation thereof to be appropriate for the uses proposed, logically related to existing and proposed topographical and other conditions, and consistent with the Comprehensive Plan, because:

The proposed use of of the site is consistent with the land uses for overall hospital campus as called for under the Comprehensive Plan and is designed in a manner to blend into the existing hospital campus.

G. Provides pedestrian accessibility and connectivity, which may be paths, trails, sidewalks (If sidewalks are required to be installed, the Administrator or the Commission must be guided by provisions of Section 744-304 for the installation of sidewalks), or combination thereof; provides pedestrian accessibility to available public transit; and provides sidewalks along eligible public streets consisting of the walkway and any curb ramps or blended transitions because:

Pedestrian accessibility already exists within the interior and exterior of the Community Hospital South campus, including connectivity from the main hospital and surgery center buildings to the Community Health Network MD Anderson Cancer Center.

**DECISION**

IT IS THEREFORE the decision of this body that this APPROVAL petition is APPROVED.

Adopted this \_\_\_\_\_ day of \_\_\_\_\_, 20 \_\_\_\_

\_\_\_\_\_  
Commission President/ Secretary

**Exhibit A**

**Heritage Tree Conservation**

Removal of any Heritage Tree is prohibited unless any of the following determinations are made before removal:

1. The Administrator or the city’s Urban Forester determines that the tree is dead, significantly and terminally diseased, a threat to public health or safety, or is of an undesirable or nuisance species.
2. The Director of the Department of Public Works determines that the tree interferes with the provision of public services or is a hazard to traffic.
3. The Administrator determines that the location of the tree is preventing development or redevelopment that cannot be physically designed to protect the tree.
4. The site from which the tree is removed is zoned D-A and the tree is harvested as timber or similar forestry product.

<b>Table 744-503-3: Replacement Trees</b>		
<b>Size of tree removed or dead (inches)</b>	<b>Number of Trees to be planted to replace a Heritage Tree</b>	<b>Number of Trees to be planted to replace an existing tree</b>
Over 36 DBH	15	10
25.5 to 36 DBH	11	8
13 to 25 DBH	8	6
10.5 to 12.5 DBH	6	4
8.5 to 10 DBH	5	4
6.5 to 8	3	2
4 to 6	2	2
2.5 to 3.5	1	1















View of site looking northeast



View of site looking northwest



View of site looking east



View from site looking northwest



View from site looking west



View from site looking north