







Memorandum

Date: June 28, 2018

To: SOUTHERN NEVADA DISTRICT BOARD OF HEALTH

From: Jeremy Harper, REHS, *Environmental Health Supervisor* 
Karla Shoup, REHS, *Environmental Health Manager* 
Herb Sequera, REHS, *Director of Environmental Health* 
Joseph P. Iser, MD, DrPH, MSc, *Chief Health Officer* 

Subject: Variance Request to Operate three Public Bathing Places not in Compliance with the Nevada Administrative Code (NAC) 444.128, 444.442, and 444.454; FP Holdings LP, dba Palms Casino Resort, located at 4321 West Flamingo Road, Las Vegas, Nevada 89103; [Assessor's Parcel Number (APN) 162-19-501-004] for Health Permits PR0124011, Scott Zucker and Desmond Stevens, for the Owner(s), FP Holdings LP.

I. BACKGROUND:

FP Holdings LP, dba Palms Casino Resort is petitioning for a variance as requested by Scott Zucker of Station Casinos and Desmond Stevens of STO Design Group, representatives for the owner, to construct and operate one public swimming pool not in compliance with the following: Nevada Administrative Code (NAC) **444.128.7**, which states that "All stairs entering a pool must be recessed into the walls of the pool and a guardrail must be provided in the walkway around the stairwell. An exception to this will permit the construction of steps at the shallow end of the pool."

In addition, Palms Casino Resort is petitioning for a variance to construct and operate two public spas not in compliance with NAC **444.442.1**, which states that "Spa steps, ladders or recessed treads must be provided when the spa is more than 2 feet (61 cm) deep;" **444.442.2**, which states that "A spa must be equipped with at least one handrail (or ladder equivalent) for each 50 feet of perimeter or portion thereof, to designate the point or points of entry and exit;" and **444.454.1**, which states that "A continuous, unobstructed deck at least 4 feet wide, including the coping, must be provided around at least half of the perimeter of the spa."

The public bathing places are located on APN 162-19-501-004, at 4321 West Flamingo Road, Las Vegas, Nevada.

II. DISCUSSION:

For the public swimming pool, the petitioner is requesting a variance from NAC 444.128, which would allow them to construct East Pool at the property with a set of stairs in the deep area, without the stairs being recessed into the wall. The top tread of the proposed stairs is an extended shelf and is uniformly submerged at the 7" water depth. An additional set of wall step treads is also provided for exiting from the deep water of the pool. The footprint of the pool lies mostly within an existing structural depression. The depression floor slopes downward from east to west which predicates the respective locations of the shallow and deep ends. It is not possible to recess the proposed deep end stairs into the pool wall as the pool depth abruptly decreases to 7" only, to negotiate the perimeter wall of the depression. In addition to the stairs, a recessed step tread ladder set of pool steps is provided from the deep end of the pool to the surrounding deck.

For the public spas, the petitioner is requesting a variance from NAC 444.442 and 444.454, which would allow them to construct two identical spas. The spas are located in the men's and women's hot lounges, and are raised 18" above the surrounding deck to maintain headroom beneath at level 1 by averting intrusion of the spa shell into that space. Headroom would otherwise be significantly reduced.

While the raised condition obstructs the spas' perimeter, there is a minimum 4' wide unobstructed deck for 38% of the perimeter immediately adjacent to the obstruction. The maximum distance from the perimeter length of deck for any bather cannot exceed 7'-9" from any location within the body of water.

The evidence presented for granting a variance to permit FP Holdings LP to deviate from NAC 444.128, 444.442, and 444.454, is listed below.

The petitioner states the following in regard to this requirement:

1. There must be circumstances or conditions which are unique to the applicant, and do not generally affect other persons subject to the regulation:

East Pool:

The pool is located partially within and partially outside a structural depression. The depression's as-built floor slopes downward in the east to west direction, which precludes locating stairs in a 3'-6" shallow end depth and providing a 4'-1" deep area, because the pool floor would necessarily intersect the existing structural slab.

The proposed maximum pool depth is only 4'-1" and the stairs in that location are thus categorized as not being in the "shallow end" of the pool. The stairs' deviation from NAC 444.128.7 is from not being recessed into the pool wall. This is not feasible due to the pool's edge being beyond the vertical wall of the depression. This existing condition was resolved by transitioning to a 7" water depth extended shelf on the deep end stairs. The 7" water depth mitigates the need for a guardrail around the proposed stairs.

The unique configuration of the existing structure is a project specific condition. The pool will in all respects, other than the stairs not being recessed into a pool wall, comply with the requirements for ladders, stairs, decks, markings, recirculation, etc.

Granting a variance will not affect other persons subject to regulations for minimum depth since this relates to existing structures and circumstances at Palms Casino Resort. The design of the water body will comply in all respects with the requirements of Nevada Administrative Code, Chapter 444.

Public Spas:

The spas are located on a second, elevated floor, and have a water depth of 3.5 ft. and 6" of freeboard. Without raising the spa wall adjacent the deck by 18", the floor of the basins would project into the headroom at the lower level. The raised wall does provide ADA compliant access to the spa for a bather, by sitting on the wall cap and rotation of the body [*Note added by staff: SNHD does not determine or enforce ADA compliance*].

A 4' minimum width deck abuts the open, 10' long run of the spas' front walls.

The percentage of adjacent perimeter deck is 38%, slightly less than 50%, but by its small size, a bather can never be further than 7'-9" from the deck.

Granting a variance will not affect other persons subject to regulations for spa decks since the circumstances of both limited headroom beneath and confined horizontal space are a project specific condition at Palms Casino Resort. The design of the water body will comply in all respects other than those cited in the variance application with the requirements of Nevada Administrative Code, Chapter 444.

2. There must be circumstances or conditions which make compliance with the regulation unduly burdensome and cause a hardship to and abridge a substantial property right of the applicant, and the variance is necessary to render substantial justice to and preserve the property rights of the applicant:

Compliance with the current regulations would be unduly burdensome, cause hardship, and is necessary for Palms Casino Resort for the following reasons:

East Pool:

- a. Design of the pool area is now far advanced and the requirement to reverse the existing slope of the structural depression will be exorbitantly costly and necessitate extensive re-design; construction and design costs estimated at \$1,150,000.
- b. In the increasingly competitive Las Vegas market, limiting the East Pool's depth would detract from guests' enjoyment by failing to provide the expected summer bathing experience. The East Pool's important marketing role would be impaired by such a deficiency. The hardships incurred by compliance with the regulation would be lessened project visibility, reduced property occupancy, and decreased revenues, estimated at \$5.5 million per annum.

- c. Additional re-design, resubmittal, and permitting time to Clark County Building Department would be an estimated four months.

Public Spas:

- a. Design of the pool area is now far advanced and without accommodation of the raised edge, a substantial redesign of the entire space will be necessary. Additional design and construction costs for the upper level structural modifications are estimated at \$475,000.
 - b. In the increasingly competitive Las Vegas market, the raises fronts of the spas significantly enhance their functionality also serve an important role in marketing value. The hardships incurred by compliance with the regulation would be lessened project visibility, reduced property occupancy, and decreased revenues, estimated at \$1.5 million per annum.
 - c. Additional re-design, resubmittal, and permitting time to Clark County Building Department would be an estimated four months.
3. Granting the variance will not be detrimental or pose a danger to the public health and safety:

East Pool:

The variance will not be detrimental or pose a danger to public health and safety; as "deep end stairs" are a common feature and the depth at that point is only 4'-0". The pool will be designed incorporating all necessary and NAC intended safety provisions, subscribing in all other respects to the requirements of Nevada Administrative Code, Chapter 444.

Public Spas:

The variance will not be detrimental or pose a danger to public health and safety, since a minimum 4ft. width deck is provided no further than 7"-9'. from any bather; the raised edge meeting ADA Code and providing a means of access for all bathers and being of no hinderance.

All aspects pertaining to ease of access, high visibility and safety of bathers are addressed in the design.

III. RECOMMENDATION:

1. With regard to a variance from NAC 444.128 regarding the stairs in the East Pool, staff is of the opinion that circumstances exist which satisfy the requirements for a variance, and that granting a variance from these regulations will not be detrimental or pose a danger to public health and safety.

2. With regard to a variance from NAC 444 for deck obstructions for the two public spas, staff is of the opinion that circumstances exist which satisfy the requirements for a variance, and that granting a variance from these regulations will not be detrimental or pose a danger to public health and safety.

Staff recommends approval of a variance with the conditions outlined below.

IV. CONDITIONS

1. The petitioner agrees to maintain the walkway area around the spas accessible and free from obstructions;
2. The petitioner agrees to adhere to all other applicable requirements of the Public Bathing Places Public Spas Regulations, NAC 444;
3. Failure of the petitioner to prevent public health and safety issues, as determined by the health authority, will result in the voiding of this variance;
4. This variance is automatically terminated without further notice upon the closing of any sale transaction involving the subject property, or upon petitioner leasing or assigning operation of these public bathing pools and spas to any other person or entity.

JH

Attachments:

- A. Nevada Secretary of State Corporate Information
- B. Variance Application Letter
- C. Variance Candidate Worksheet
- D. Assessor's Parcel Information
- E. Assessor's Map
- F. Area Plans and Architectural Details
- G. Public Notice

ATTACHMENT

A

FP HOLDINGS, L.P.

Business Entity Information			
Status:	Active	File Date:	5/16/2011
Type:	Limited Partnership (ULPA)	Entity Number:	E0280362011-7
Qualifying State:	NV	List of Officers Due:	5/31/2019
Managed By:		Expiration Date:	
NV Business ID:	NV20111330639	Business License Exp:	5/31/2019

Additional Information	
Central Index Key:	

Registered Agent Information			
Name:	STATION CASINOS LLC	Address 1:	1505 S PAVILION CENTER DR
Address 2:		City:	LAS VEGAS
State:	NV	Zip Code:	89135
Phone:		Fax:	
Mailing Address 1:		Mailing Address 2:	
Mailing City:		Mailing State:	NV
Mailing Zip Code:			
Agent Type:	Commercial Registered Agent		
Status:	Active		

Financial Information			
No Par Share Count:	0	Capital Amount:	\$ 0
No stock records found for this company			

- Officers		<input type="checkbox"/> Include Inactive Officers	
General Partner - FIESTA PARENTCO, L.L.C.			
Address 1:	1505 S PAVILION CENTER DRIVE	Address 2:	
City:	LAS VEGAS	State:	NV
Zip Code:	89135	Country:	
Status:	Active	Email:	

- Actions\Amendments			
Action Type:	Certificate of Limited Partnership		
Document Number:	20110364170-05	# of Pages:	1
File Date:	5/16/2011	Effective Date:	
(No notes for this action)			

Action Type:	Miscellaneous		
Document Number:	20110364174-49	# of Pages:	2
File Date:	5/16/2011	Effective Date:	
(No notes for this action)			
Action Type:	Initial List		
Document Number:	20110404118-22	# of Pages:	1
File Date:	5/31/2011	Effective Date:	
(No notes for this action)			
Action Type:	Amendment		
Document Number:	20110580191-38	# of Pages:	2
File Date:	8/4/2011	Effective Date:	
(No notes for this action)			
Action Type:	Merge In		
Document Number:	20110842453-60	# of Pages:	6
File Date:	11/30/2011	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20120327245-48	# of Pages:	1
File Date:	5/8/2012	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20130231957-43	# of Pages:	1
File Date:	4/8/2013	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20140324767-36	# of Pages:	1
File Date:	5/1/2014	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20150248609-27	# of Pages:	1
File Date:	6/1/2015	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20160210436-65	# of Pages:	1
File Date:	5/9/2016	Effective Date:	
(No notes for this action)			
Action Type:	Registered Agent Change		
Document Number:	20170234626-83	# of Pages:	1
File Date:	4/25/2017	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		

Document Number:	20170237488-62	# of Pages:	1
File Date:	5/31/2017	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20180247414-13	# of Pages:	1
File Date:	5/31/2018	Effective Date:	
(No notes for this action)			

ATTACHMENT

B

STATION CASINOS

March 14, 2018

Ms. Jacqueline Reszetar, Environmental Health Division Dir.
Southern Nevada Health District
Environmental Health Division - Pool Plan Desk
330 S. Valley View Blvd.
Las Vegas, NV 89152

**Subject: Palms Casino Resort
4321 W. Flamingo Road
Las Vegas, NV 89103
EAST POOL - Variance Application**

Dear Ms. Reszetar:

Please accept this letter and a Variance Candidate worksheet, together with plans and sections of the referenced project's "East Pool", as a request to grant a variance to deviate from NAC section 444.128.7 - "Ladders and stairs" - requiring that stairs be recessed into the walls of the pool and a guardrail provided in the walkway around the stairwell.

Specifically, the variance application is to grant conditions that:

The proposed pool may have a set of stairs in its deep area, (where the water depth is 4'-1"), without these stairs being recessed into the pool wall or the requirement for a guardrail in the walkway around the stairwell. The top tread of the proposed stairs is an extended shelf and uniformly submerged at the 7" water depth. An additional set of wall step treads is also provided for exiting from the deep water end of the pool.

Please note the following project information:

Business Address of Owner:

FP Holdings LP
1505 S. Pavilion Center Dr.
Las Vegas, NV 89135

Project Location:

4321 W. Flamingo Road
Las Vegas, NV 89103

Assessor's Parcel Number:

162-19-501-004

Operator:

Palms Casino Resort
4321 W. Flamingo Road
Las Vegas, NV 89103
(702) 942-7777

Contact name for the Owner:

Name: Scott Zucker, Sr. Project Director
Cell phone: (702) 286-3826

Per the concept plan presented and discussed with SNHD pool review staff on March 7, 2018, the resort's intent is that the two largest water bodies on the project's primary recreational deck are pools with areas of 4+/- ft. water depth, being the norm and expected bathing experience in Las Vegas casino resort environments.

The proposed profile of the East Pool deviates from NAC 444 in one respect, thus:

Section 444.128.7 requires that stairs entering a pool must be recessed into the walls of the pool and a guardrail must be provided in the walkway around the stairwell. There is an exception to this in the code, for steps at the shallow end of a pool. However, an existing structural condition precludes locating stairs in the shallow end of the pool.

The footprint of the 3,674 sq.ft. water surface area pool, 'egg-shaped' in plan view, lies mostly within, but also partially outside, an existing structural depression. The depression floor slopes downward from east to west which predicates the respective locations of the shallow and deep ends. It is not possible to recess the proposed deep end (i.e. > 3'-6" water depth) stairs into the pool wall as the pool depth abruptly decreases to 7" only, to negotiate the perimeter wall of the depression. In addition to the stairs, a recessed step tread ladder set of pool steps is provided from the deep water end of the pool to the surrounding deck.

The following lists the conditions, circumstances and issues that support granting a variance to the project, thus:

EVIDENCE SUBMITTED FOR GRANTING A VARIANCE:

The evidence presented for granting a variance to permit Palms Casino Resort to deviate from NAC regulations 444.128.7 is as follows:

(1) There are circumstances or conditions which are unique to the applicant, thus:

- a. The pool is located partially within and partially outside an existing structural depression. The depression's as-built floor slopes downwards in the east to west direction, which precludes locating stairs in a 3'-6" shallow end depth and providing a 4'-1" deep area, because the pool floor would necessarily intersect the existing structural slab.
- b. The proposed maximum pool depth is only 4'-1" and the stairs in that location are thus categorized as not being in the "shallow end" of the pool. The stairs' deviation from NAC 444.128.7 is from not being recessed into the pool wall. This is not feasible, due to the pool's edge being beyond the vertical wall of the depression. (This existing condition was resolved by transitioning to a 7" water depth extended shelf on the deep end stairs). The 7" water depth mitigates the need for a guardrail around the proposed stairs.
- c. The unique configuration of the existing structure is a project specific condition. The pool will in all respects, other than the stairs not being recessed into a pool wall, comply with the requirements for ladders, stairs, decks, markings, recirculation, etc.

(2) Do not generally affect other persons subject to regulations:

Granting a variance will not affect other persons subject to regulations for minimum depth since this relates to existing structures and circumstances at Palms Casino Resort. The design of the water body will comply in all respects with the requirements of Nevada Administrative Code, Chapter 444.

(3) Make compliance with the regulation unduly burdensome, cause hardship and granting the variance is necessary to render substantial justice to the applicant and enable their preserving and enjoying a property right:

Compliance with the current regulations would be unduly burdensome, cause hardship and is necessary for Palms Casino Resort for the following reasons -

- a. Design of the pool area is now far advanced and the requirement to reverse the existing slope of the structural depression will be exorbitantly costly and necessitate extensive re-design; construction and design costs estimated at \$1,150,000
- b. In the increasingly competitive Las Vegas market, limiting the East Pool's depth would detract from guests' enjoyment by failing to provide the expected summer bathing experience. The East Pool's important marketing role will be impaired by such a deficiency. The hardships incurred by compliance with the regulation would be

lessened project visibility, reduced property occupancy and decreased revenues, estimated at \$5.5 million per annum.

- c. Additional re-design, resubmittal and permitting time to Clark County Bldg. Dept. would be an estimated four months.

(4) Granting the Variance will not be detrimental or pose a danger to public health and safety:

The variance will not be detrimental or pose a danger to public health and safety; as "deep end stairs" are a common feature and the depth at that point is only 4'-0". The pool will be designed incorporating all necessary and NAC intended safety provisions, subscribing in all other respects to the requirements of Nevada Administrative Code, Chapter 444.

Enclosed herein are:

1. Plans and sections of the pool
2. Variance Candidate Worksheet
3. Variance Application Letter
4. Variance Application Fee of \$1,181.00

Please contact me if you require any further information for your consideration of this variance request.

Sincerely



Matthew L. Heinhold – Authorized Signatory, FP Holdings, L.P.

cc: Scott Zucker, Station Casinos
Desmond Stevens, STO Design Group

1505 S. Pavilion Center Dr. Las Vegas, Nevada 89135 Ph 495-3657

STATION CASINOS

March 14, 2018

Ms. Jacqueline Reszetar, Environmental Health Division Dir.
Southern Nevada Health District
Environmental Health Division - Pool Plan Desk
330 S. Valley View Blvd.
Las Vegas, NV 89152

**Subject: Palms Casino Resort
4321 W. Flamingo Road, Las Vegas, NV 89103
HEALTH SPA – Men's & Women's Lounges Hot Spas - Variance
Application**

Dear Ms. Reszetar:

Please accept this letter and Variance Candidate worksheet, together with plans and sections of the referenced project's two identical spas in the Men's and Women's Wet Lounges, as a request to grant a variance to deviate from NAC section 444.442 - "Steps, ladders, treads and handrails required" – (subsections 444.442.1 and 444.442.2) and section 444.454.1 - "Decks: Dimensional design". These spas are raised 18" above the surrounding deck, to maintain headroom beneath at Level I, by averting intrusion of the spa shell into that space - which would otherwise be significantly reduced.

While the raised condition obstructs the spas' perimeter, there is a minimum 4 ft. wide, unobstructed and uninterrupted deck for 38% of their perimeter, immediately adjacent the obstruction. Further, while approximately 60% of the spas' perimeters are inaccessible, a bather's max. distance from the (38%) perimeter length of deck cannot exceed 7'-9" feet at any location within the water body.

The recessed spa basins are approximately circular; a constraint imposed by the limited available area on the building's second level. The rectilinear front wall of each spa is 18" high, facing the main lounge area, and meets all the requirements as a "transfer wall" for ADA Code compliance. It can be readily used by any guest for access or egress to/from the water body.

The raised edge of the spas resolves the intrusion into the headroom of the floor below.

Please note the following project information:

Business Address of Owner:

FP Holdings LP
1505 S. Pavillon Center Dr.
Las Vegas, NV 89135

Project Location:

4321 W. Flamingo Road
Las Vegas, NV 89103

Assessor's Parcel Number:

162-19-501-004

Operator:

Palms Casino Resort
4321 W. Flamingo Road
Las Vegas, NV 89103
(702) 942-7777

Contact name for the Owner:

Name: Scott Zucker, Sr. Project Director
Cell phone: (702) 286-3826

Per the concept plan presented and discussed with SNHD pool review staff on March 7, 2018, the two identical spas deviate from NAC 444 as follows:

Section 444.442.1 requires that "Spa steps, ladders or recessed treads must be provided when the spa is more than 2 feet deep." In this instance, an ADA compliant "Transfer Wall" is proposed as the means of entry/exit to and from the spas for all bathers, in lieu of steps, ladders or recessed treads.

Section 444.442.2 requires that "A spa must be equipped with at least one handrail (or ladder equivalent) for each 50 ft. of perimeter or portion thereof, to designate the point or points of entry and exit." These spas, (total perimeter only 26 ft.) will have an ADA handicapped "Transfer Wall" with a grab rail, in lieu of stairs with a handrail.

Section 444.454.1 requiring "A continuous unobstructed deck at least 4 feet wide, including the coping, must be provided around at least half of the perimeter of the spa."

The spas are mostly circular, approx. 8' in diameter with one corner chamfered to accommodate a skimmer; the opposing corner chamfered for symmetry. The water surface of each is 52 sq.ft. While steps are required every 50 ft. of perimeter by code, the total perimeter

is 26 ft. of which 10 ft. - (38% of the spa's perimeter) - is an 18" raised wall adjacent an unobstructed, 4 ft. min. width deck.

The following lists the conditions, circumstances and issues that support granting a variance to the project, thus:

EVIDENCE SUBMITTED FOR GRANTING A VARIANCE:

The evidence presented for granting a variance to permit Palms Casino Resort to deviate from NAC regulations 444.442.2 and 444.454.1 is as follows:

(1) There are circumstances or conditions which are unique to the applicant, thus:

- a. The spas are located on a second, elevated floor and have a water depth of 3.5 ft. and 6" of freeboard. Without raising the spa wall adjacent the deck by 18", the floor of the basins would project into the headroom at the lower level. (The raised wall does provide ADA compliant access to the spa for a bather, by sitting on the wall cap and rotating the body).
- b. A 4 ft. minimum width deck abuts the open, 10 ft. long run of the spas' front walls.
- c. The percentage of adjacent perimeter deck is 38%, slightly less than 50%, but by its small size, a bather can never be further than 7'-9" from the deck.

(2) Do not generally affect other persons subject to regulations:

Granting a variance will not affect other persons subject to regulations for spa decks since the circumstances of both limited headroom beneath and confined horizontal space are a project specific condition at Palms Casino Resort. The design of the water body will comply in all respects other than those cited in the variance application with the requirements of Nevada Administrative Code, Chapter 444.

(3) Make compliance with the regulation unduly burdensome, cause hardship and granting the variance is necessary to render substantial justice to the applicant and enable their preserving and enjoying a property right:

Compliance with the current regulations would be unduly burdensome, cause hardship and is necessary for Palms Casino Resort for the following reasons -

- a. Design of the Health Spa is now far advanced and without accommodation of the spas' raised edges, a substantial redesign of the entire space will be necessary. Additional design and increased construction costs for the upper level structural modifications are estimated at \$475,000.
- b. In the increasingly competitive Las Vegas market, the raised fronts of the spas significantly enhance their functionality and also serve an important role in marketing value. The hardships incurred by compliance with the regulation would be lessened

project visibility, reduced property occupancy and decreased revenues, estimated at \$1.5 million per annum.

- c. Additional re-design, resubmittal and permitting time to Clark County Bldg. Dept. would be an estimated four months.

(4) Granting the Variance will not be detrimental or pose a danger to public health and safety:

The variance will not be detrimental or pose a danger to public health and safety, since a minimum 4 ft. width deck is provided no further than 7'-9" from any bather; the raised edge meeting ADA Code, providing a means of access to the basin for all bathers and being of no hindrance.


All aspects pertaining to ease of access, high visibility and safety of bathers are addressed in the design.

Enclosed herein are:

1. Plans and sections of a typical spa
2. Variance Candidate Worksheet
3. Variance Application Letter
4. Variance Application Fee of \$1,181.00

Please contact me if you require any further information for your consideration of this variance request.

Sincerely



Matthew L. Heinhold – Authorized Signatory, FP Holdings, L.P.

cc: Scott Zucker, Stations Casinos
Desmond Stevens, STO Design Group

1505 S. Pavilion Center Dr. Las Vegas, Nevada 89135 Ph 495-3657

ATTACHMENT

C



VARIANCE CANDIDATE WORKSHEET

PART I:

ESTABLISHMENT INFORMATION

Name of Facility/Establishment: Palms Casino Resort
Health Permit Number: _____ Date of Inquiry: March 7, 2018
Name of Operator/Agent: Samuel Tiano - Nightlife/pool Manager
Address of Operator/Agent: 4321 W. Flamingo Rd., Las Vegas, NV 89103
Contact Information of Operator/Agent:
Office Phone: (702) 942-7777 Cell Phone: _____
Fax Number: _____ Email Address: samuel.tiano@stationcasinos.com
If corporation, the name/title of individual to sign for Variance document:
Name: Matthew Heinhold
Title: Authorized Signatory

OWNER INFORMATION

Name of Property Owner: FP Holdings LP
Address of Property Owner: 1501 S. Pavilion Center Drive, Las Vegas, NV 89135
Contact Information of Property Owner: Scott Zucker
Office Phone: (702) 495-3000 Cell Phone: (702) 286-3826
Fax Number: _____ Email Address: Scott.Zucker@stationcasinos.com

PROPERTY INFORMATION

Property Address: 4321 W. Flamingo Road, Las Vegas, NV 89103
Assessor's Parcel Number (APN): 162-19-501-004
Describe location within larger facility (i.e. hotel/casino/resort, etc.):
East Pool of the Main Pool Deck within Palms Casino Resort.
The 3,674 sq.ft. water surface area pool will be a tension edge type - (i.e. water surface at the surrounding deck elevation),
The pool will have a recessed tread ladder at the shallow (east) end and one recessed tread ladder plus a set of stairs at its deep (west) end.
The proposed pool's footprint falls mostly within, but also partially outside, an existing structural depression which in longitudinal profile slopes downward in the east to west direction - (Reversing this relatively steep slope would entail extensive demolition and structural rework).
The pool is one of seven water bodies, (in addition to another pool and five spas), on the main level of the Pool Deck.

Describe Variance Issue (s): (Include sections of the Regulation or Nevada Administrative Code that applies to the request for a variance)

NAC 444.128.7 - Stairs are located in the pool's deep end, but cannot be recessed into the pool wall to meet the Code section provisions.
This is because the perimeter wall of the structural depression bunker abruptly steps up its full height, within the pool footprint.
The stairs ascend from the pool floor - (at the deep, 4'-1" max. water depth) - to a large, extended top tread with only 7" water depth, so bridging over the perimeter of the structural depression's wall perimeter. The shallow and deep ends of the pool are not interchangeable.
If the 3'-6" shallow depth was located at the west end of the pool, the depth could only increase by 1", moving east, before intersecting with the existing depression's concrete slab floor. For bather enjoyment and guest experience, a 4 ft.+ water depth area is essential.

PART II:

Nevada Administrative Code 439.240 states in general that certain conditions or circumstances must be shown to exist in order for a Board of Health to approve a request for a Variance from adopted public health regulations. A variance application letter (as noted below in PART III) MUST specifically address each of the following issues:

1. There must be circumstances or conditions which are unique to the applicant, and do not generally affect other persons subject to the regulation. Please indicate how your request is unique to your situation and is, therefore, not likely to affect other persons subject to the regulations:

The pool is located partially within a depression which has a structural concrete slab floor that rises in the west to east direction. This precludes locating a 3'-6" depth "Shallow end" in the west end of the pool and deepening that to a 4' + depth in an east "Deep end".
The desired depth profile can be achieved deepening the pool from east to west, but the deep end stairs cannot be recessed into the pool wall per NAC 444.128.7 because of the interference with the wall of the vertical depression.
The existing structural depression's profile is a unique condition and thereby not likely to affect other persons subject to the regulations.
The proposed deep end stairs are only 6" taller than 3'-6" which is allowed by Code in the shallow of pools and do not require being recessed into the wall. Further, the top tread of these stairs is an extended shallow shelf with 7" depth water, which mitigates the need for a guardrail around stairs recessed into a pool wall. The pool will in all other respects comply with requirements for ladders, stairs, markings, recirculation, etc.

2. There must be circumstances or conditions which make compliance with the regulation unduly burdensome and cause a hardship to and abridge a substantial property right of the applicant, and the variance is necessary to render substantial justice to and preserve the property rights of the applicant. Please indicate in what manner compliance with the regulation would be burdensome or cause a hardship on your business or how the free use of your property may be affected (if economic factors are an issue, please include estimates regarding the costs that would incurred by compliance):

Design of the Pool Area is far advanced and the requirement to reverse the existing slope of the structural depression floor slab will necessarily entail substantial re-design of the pool and structural depression rework, at an estimated additional design and construction costs of \$1,150,000.
Compliance with the current regulation would be burdensome and cause hardship on The Palms business in the increasingly competitive Las Vegas resort market. Limiting the East Pool's water depth to only 3'-6" does not provide the expected summer bathing experience for Las Vegas resort guests and the East Pool's important marketing role will be significantly impaired with a depth limitation. The hardships incurred by compliance with the regulation would be lessened project visibility, reduced property occupancy and decreased revenues, estimated at \$5.5 million per annum.
Additional re-design, resubmittal and permitting time to Clark County Bldg. Dept. would be an estimated four months.

3. Granting the variance will not be detrimental or pose a danger to the public health and safety. Please provide evidence that the variance request, if approved, will not adversely affect the safe and sanitary operation of the applicant(s) pool, spa, or food establishment:

The variance will not be detrimental or pose a danger to public health and safety, as "deep end" stairs are a common feature in resort pools, and the stairs proposed are also integral with a shallow water Baja shelf. The pool will be designed incorporating all necessary and NAC Ch. 444 safety provisions. Granting the variance will not affect other persons subject to regulations.

NAC 439.240 Approval by State Board of Health. (NRS 439.150, 439.190, 439.200)

1. The State Board of Health will grant a variance from a regulation only if it finds from the evidence presented at the hearing that:
 - (a) There are circumstances or conditions which:
 - (1) Are unique to the applicant;
 - (2) Do not generally affect other persons subject to the regulation;
 - (3) Make compliance with the regulation unduly burdensome; and
 - (4) Cause a hardship to and abridge a substantial property right of the applicant; and
 - (b) Granting the variance:
 - (1) Is necessary to render substantial justice to the applicant and enable the applicant to preserve and enjoy his or her property right; and
 - (2) Will not be detrimental or pose a danger to public health and safety.
2. Whenever an applicant for a variance alleges that he or she suffers or will suffer economic hardship by complying with the regulation, the applicant must submit evidence demonstrating the costs of compliance with the regulation. The Board will consider the evidence and determine whether those costs are unreasonable.
[Bd. of Health, Variances Reg. §§ 2.7-2.8, eff. 10-16-80; A 2-5-82; 1-19-84]

PART III:

A **Variance Application Letter**, which includes all information provided by the applicant on his worksheet, must be submitted in writing to the Environmental Health Division (EHD) Director no later than 40 days before the monthly Board of Health Meeting. The Application letter must be on the owner's letterhead signed by the Owner/Corporate Officer specifically listing which part(s) of the Regulation the proposed Variance covers with this completed Worksheet as an attachment. The written Application Letter must take particular care in providing statements and evidence of circumstances or conditions and reasons why the District Board of Health should grant the Variance as listed in NAC 439.240 as shown at the top of this page. *ALL information you have provided in PART I and II of this Worksheet must be included in the body of the letter.* The evidence required may include 8 1/2" x 11" or 11" x 17" detailed drawings and/or photographs.

The Variance process is outlined in Nevada Administrative Code (NAC) 439.200 through 439.260 with the exception that an application fee is payable to SOUTHERN NEVADA HEALTH DISTRICT (SNHD).

This section to be completed by SNHD staff ONLY

Next closing date is: _____ for the _____ BOH Meeting.

Referred by: _____

(Print Name of REHS)

Completed by: _____ Date: _____

(Print Name of REHS if not by supervisor)

Received by: _____ Date: _____

(Owner/Operator/Agent)

Reviewed by: _____ Date: _____

(Signature of SNHD Manager)



VARIANCE CANDIDATE WORKSHEET

PART I:

ESTABLISHMENT INFORMATION

Name of Facility/Establishment: Palms Casino Resort
Health Permit Number: _____ Date of Inquiry: March 7, 2018
Name of Operator/Agent: Samuel Tiano - Nightlife/pool Manager
Address of Operator/Agent: 4321 W. Flamingo Rd., Las Vegas, NV 89103
Contact Information of Operator/Agent:
Office Phone: (702) 942-7777 Cell Phone: _____
Fax Number: _____ Email Address: samuel.tiano@stationcasinos.com
If corporation, the name/title of individual to sign for Variance document:
Name: Matthew Heinhold
Title: Authorized Signatory

OWNER INFORMATION

Name of Property Owner: FP Holdings LP
Address of Property Owner: 1501 S. Pavilion Center Drive, Las Vegas, NV 89135
Contact Information of Property Owner: Scott Zucker
Office Phone: (702) 495-3000 Cell Phone: (702) 286-3826
Fax Number: _____ Email Address: Scott.Zucker@stationcasinos.com

PROPERTY INFORMATION

Property Address: 4321 W. Flamingo Road, Las Vegas, NV 89103
Assessor's Parcel Number (APN): 162-19-501-004
Describe location within larger facility (i.e. hotel/casino/resort, etc.):
Men's & Women's Wet Lounge hot spas, Palms Casino Resort Health Spa.
The Men's & Women's Lounge identical hot spas in the Palms Health Spa are small, 52 sq.ft basins, each with eight hydrotherapy jets.
The spas, recessed into alcoves, are approximately circular but have a straight, 18" raised wall facing the respective lounges. This wall is compliant
with requirements for ADA access as a "Transfer Wall" and is intended for use by all bathers, for access into and out of the spas.
The raised front walls of the spas run for 38% of the total 26 ft. spa perimeter and are immediately adjacent 4 ft. minimum width
unobstructed decks.

Describe Variance Issue (s): (Include sections of the Regulation or Nevada Administrative Code that applies to the request for a variance)

NAC 444.442.1 - requires "Spa steps, ladders or recessed treads must be provided when the spa is more than 2 feet deep". In this instance,
an ADA compliant "Transfer Wall" is proposed as the means of entry/exit to and from the spas for all bathers, in lieu of steps, ladders or recessed treads.
NAC 444.442.2 - requires "A spa must be equipped with at least one handrail (or ladder equivalent) for each 50 ft. of perimeter". These
spas, (total perimeter length only 26 ft.) will have an ADA handicapped "Transfer Wall" with a grab rail, in lieu of stairs with a handrail.
NAC 444.454.1 - requires "A continuous unobstructed deck at least 4 ft. wide, including the coping, must be provided around at least
half of the perimeter of the spa".

PART II:

Nevada Administrative Code 439.240 states in general that certain conditions or circumstances must be shown to exist in order for a Board of Health to approve a request for a Variance from adopted public health regulations. A variance application letter (as noted below in PART III) MUST specifically address each of the following issues:

1. There must be circumstances or conditions which are unique to the applicant, and do not generally affect other persons subject to the regulation. Please indicate how your request is unique to your situation and is, therefore, not likely to affect other persons subject to the regulations:

The spas are located on the second floor of the building and have a 3'-6" depth and 6" of freeboard.
Without raising the spas' front walls adjacent the deck by 18", the floors of the basins would intrude into the headroom below at Level 1.
A 4 ft. minimum width deck abuts the open, straight, 10 ft. run of 18" high wall on the spas.
The 18" high wall meets all ADA requirements as a "Transfer Wall" and can be readily used by all bathers for ingress and egress into and out of the spas.
There is 4 ft. minimum width, unobstructed deck around 38% of the total 26 lineal ft. of the spas' perimeters.
The small, 52 sq.ft. water surface area of the spas is confined in approximately 8 ft. diameter circular basin configurations.
The maximum distance between a bather and the deck adjacent the front "Transfer Wall" of the spa is 7'-9"

2. There must be circumstances or conditions which make compliance with the regulation unduly burdensome and cause a hardship to and abridge a substantial property right of the applicant, and the variance is necessary to render substantial justice to and preserve the property rights of the applicant. Please indicate in what manner compliance with the regulation would be burdensome or cause a hardship on your business or how the free use of your property may be affected (if economic factors are an issue, please include estimates regarding the costs that would be incurred by compliance):

Design of the Health Spa is far advanced and without accommodation of the front raised walls on the spas, substantial re-design of the entire space will be necessary. Additional design and increased construction costs are estimated at \$475,000.
Compliance with the current regulation would be burdensome and cause hardship on The Palms business in the increasingly competitive Las Vegas resort market. The spas' raised front walls increase their functionality and enhance their marketing value.
The hardships incurred by compliance with the regulation would be lessened project visibility, reduced property occupancy and decreased revenues, estimated at \$1.5 million per annum.
Additional re-design, resubmittal and permitting time to Clark County Bldg. Dept. would be an estimated four months.

3. Granting the variance will not be detrimental or pose a danger to the public health and safety. Please provide evidence that the variance request, if approved, will not adversely affect the safe and sanitary operation of the applicant(s) pool, spa, or food establishment:

The variance will not be detrimental or pose a danger to public health and safety because spa access is provided along 38% of the spas' perimeters by an ADA recognized "Transfer Wall", adjacent which is a compliant 4 ft. minimum width deck, from which a bather's separation cannot exceed 7'-9".

NAC 439.240 Approval by State Board of Health. (NRS 439.150, 439.190, 439.200)

1. The State Board of Health will grant a variance from a regulation only if it finds from the evidence presented at the hearing that:
 - (a) There are circumstances or conditions which:
 - (1) Are unique to the applicant;
 - (2) Do not generally affect other persons subject to the regulation;
 - (3) Make compliance with the regulation unduly burdensome; and
 - (4) Cause a hardship to and abridge a substantial property right of the applicant; and
 - (b) Granting the variance:
 - (1) Is necessary to render substantial justice to the applicant and enable the applicant to preserve and enjoy his or her property right; and
 - (2) Will not be detrimental or pose a danger to public health and safety.
2. Whenever an applicant for a variance alleges that he or she suffers or will suffer economic hardship by complying with the regulation, the applicant must submit evidence demonstrating the costs of compliance with the regulation. The Board will consider the evidence and determine whether those costs are unreasonable.

[Bd. of Health, Variances Reg. §§ 2.7-2.8, eff. 10-16-80; A 2-5-82; 1-19-84]

PART III:

A Variance Application Letter, which includes all information provided by the applicant on his worksheet, must be submitted in writing to the Environmental Health Division (EHD) Director no later than 40 days before the monthly Board of Health Meeting. The Application letter must be on the owner's letterhead signed by the Owner/Corporate Officer specifically listing which part(s) of the Regulation the proposed Variance covers with this completed Worksheet as an attachment. The written Application Letter must take particular care in providing statements and evidence of circumstances or conditions and reasons why the District Board of Health should grant the Variance as listed in NAC 439.240 as shown at the top of this page. *ALL information you have provided in PART I and II of this Worksheet must be included in the body of the letter.* The evidence required may include 8 1/2" x 11" or 11" x 17" detailed drawings and/or photographs.

The Variance process is outlined in Nevada Administrative Code (NAC) 439.200 through 439.260 with the exception that an application fee is payable to SOUTHERN NEVADA HEALTH DISTRICT (SNHD).

This section to be completed by SNHD staff ONLY

Next closing date is: _____ for the _____ BOH Meeting.

Referred by: _____

(Print Name of REHS)

Completed by: _____ Date: _____

(Print Name of REHS if not by supervisor)

Received by: _____ Date: _____

(Owner/Operator/Agent)

Reviewed by: _____ Date: _____

(Signature of SNHD Manager)

ATTACHMENT

D

GENERAL INFORMATION	
PARCEL NO.	162-19-501-004
OWNER AND MAILING ADDRESS	F P HOLDINGS L P %VP FIN 4321 W FLAMINGO RD LAS VEGAS NV 89103-3903
LOCATION ADDRESS CITY/UNINCORPORATED TOWN	4321 W FLAMINGO RD PARADISE
ASSESSOR DESCRIPTION	PARCEL MAP FILE 109 PAGE 99 LOT 1
RECORDED DOCUMENT NO.	* 20111130:03441
RECORDED DATE	Nov 30 2011
VESTING	NS

*Note: Only documents from September 15, 1999 through present are available for viewing.

ASSESSMENT INFORMATION AND VALUE EXCLUDED FROM PARTIAL ABATEMENT	
TAX DISTRICT	470
APPRAISAL YEAR	2017
FISCAL YEAR	2018-19
SUPPLEMENTAL IMPROVEMENT VALUE	4384733
INCREMENTAL LAND	0
INCREMENTAL IMPROVEMENTS	0

REAL PROPERTY ASSESSED VALUE		
FISCAL YEAR	2017-18	2018-19
LAND	8692809	10204601
IMPROVEMENTS *	96493055	90679144
PERSONAL PROPERTY	0	0
EXEMPT	0	21653099
GROSS ASSESSED (SUBTOTAL)	105185863	100883746
TAXABLE LAND+IMP (SUBTOTAL)	300531037	288239274
COMMON ELEMENT ALLOCATION ASSD	0	0
TOTAL ASSESSED VALUE	105185863	100883746
TOTAL TAXABLE VALUE	300531037	288239274

ESTIMATED LOT SIZE AND APPRAISAL INFORMATION	
ESTIMATED SIZE	24.79 Acres
ORIGINAL CONST. YEAR	2001
LAST SALE PRICE MONTH/YEAR SALE TYPE	0
LAND USE	42.310 - Casino or Hotel Casino. Hotels - Class 1 Resort
DWELLING UNITS	470

PRIMARY RESIDENTIAL STRUCTURE

1ST FLOOR SQ. FT.	0	CASITA SQ. FT.	0	ADDN/CONV	
2ND FLOOR SQ. FT.	0	CARPORT SQ. FT.	0	POOL	YES
3RD FLOOR SQ. FT.	0	STYLE	Casino, Category I	SPA	NO
UNFINISHED BASEMENT SQ. FT.	0	BEDROOMS	0	TYPE OF CONSTRUCTION	
FINISHED BASEMENT SQ. FT.	0	BATHROOMS	0	ROOF TYPE	
BASEMENT GARAGE SQ. FT.	0	FIREPLACE	0		
TOTAL GARAGE SQ. FT.	0				

ATTACHMENT

E

ASSESSOR'S PARCELS - CLARK CO., NV.
Michele W. Shafe - Assessor

162-19-5

19

T21S R61E

Scale: 1" = 200'

Rev: 5/1/2018

MAP LEGEND

NOTES

This map is for assessment use only and does NOT represent a survey. No liability is assumed for the accuracy of the data delineated herein. Information on roads and other non-assessed parcels may be obtained from the Road Document Listing in the Assessor's Office. This map is compiled from official records, including surveys and deeds, but only contains the information required for assessment. See the recorded documents for more detailed legal information.

USE THIS SCALE FEET WHEN MAP REDUCED FROM LIST ORIGINAL

0 100 200 300 400 500

PARCEL BOUNDARY
 SUB BOUNDARY
 PMAID BOUNDARY
 ROAD EASEMENT
 MATCH / LEADER LINE
 HISTORIC LOT LINE
 HISTORIC SUB BOUNDARY
 HISTORIC PMAID BOUNDARY
 SECTION LINE

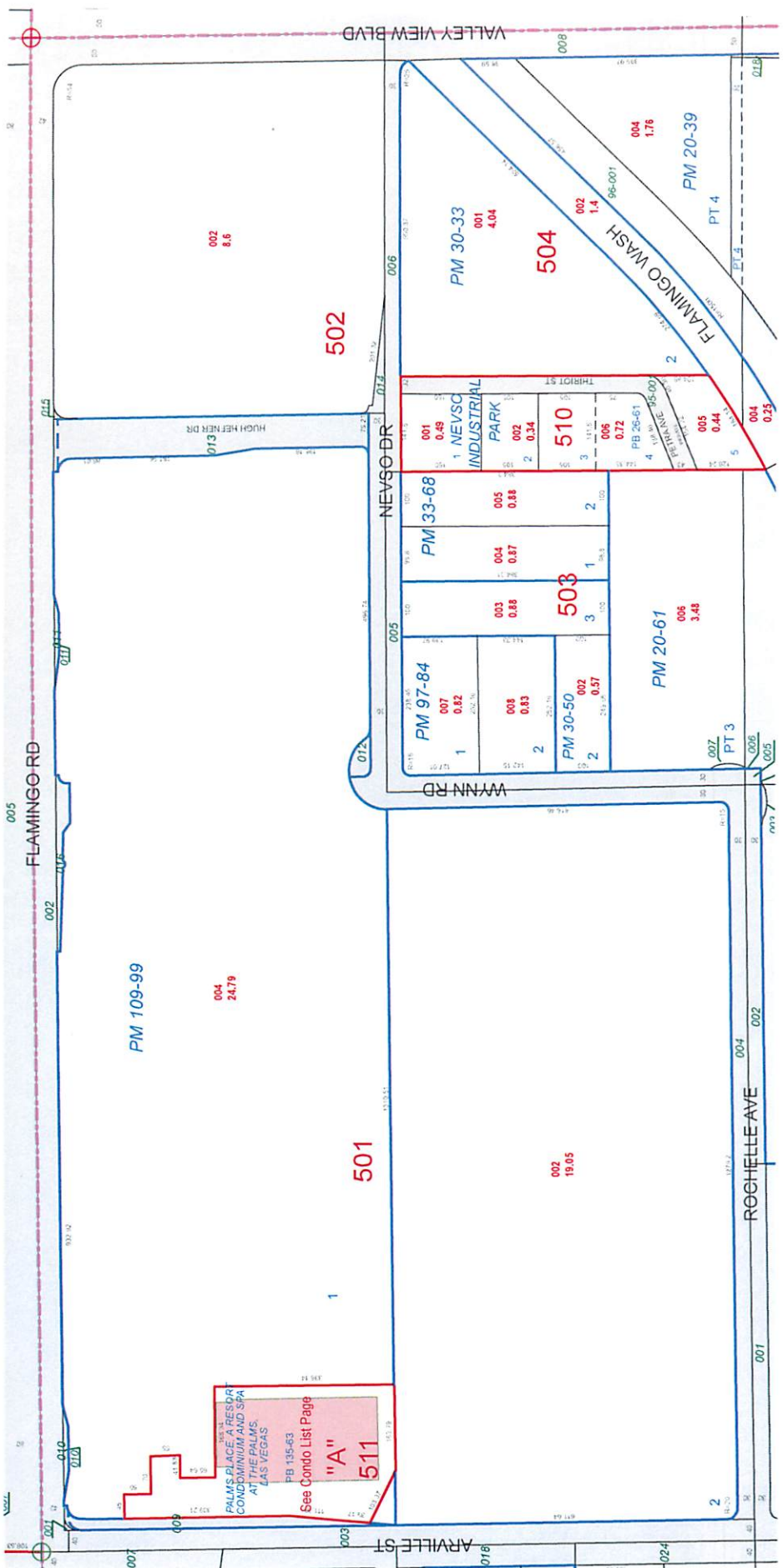
CONDOMINIUM UNIT
 AIR SPACE PCL
 RIGHT OF WAY PCL
 SUB-SURFACE PCL

007 ROAD PARCEL NUMBER
 001 PARCEL NUMBER
 1.00 ACREAGE
 202 PARCEL SUBSEQ NUMBER
 PB 24-45 PLAT RECORDING NUMBER
 5 BLOCK NUMBER
 5 LOT NUMBER
 G.L.S. GGV LOT NUMBER

1	2	3	4	5	6	7	8	9	10
11	12	13	14	15	16	17	18	19	20
21	22	23	24	25	26	27	28	29	30
31	32	33	34	35	36	37	38	39	40
41	42	43	44	45	46	47	48	49	50
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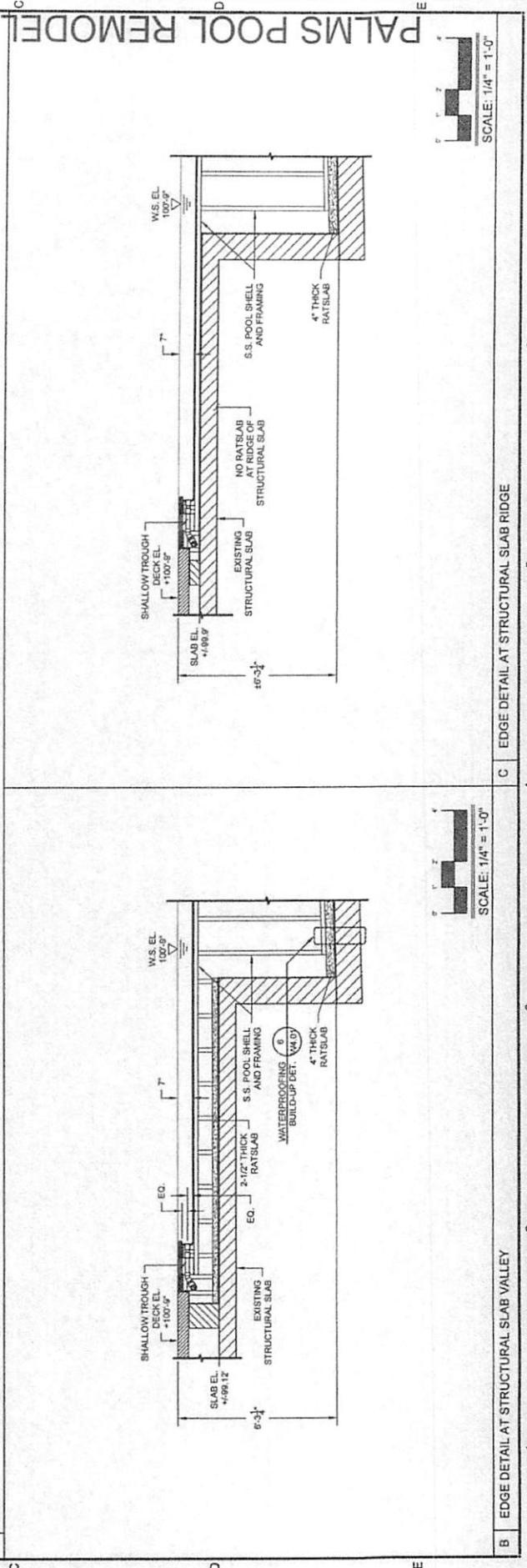
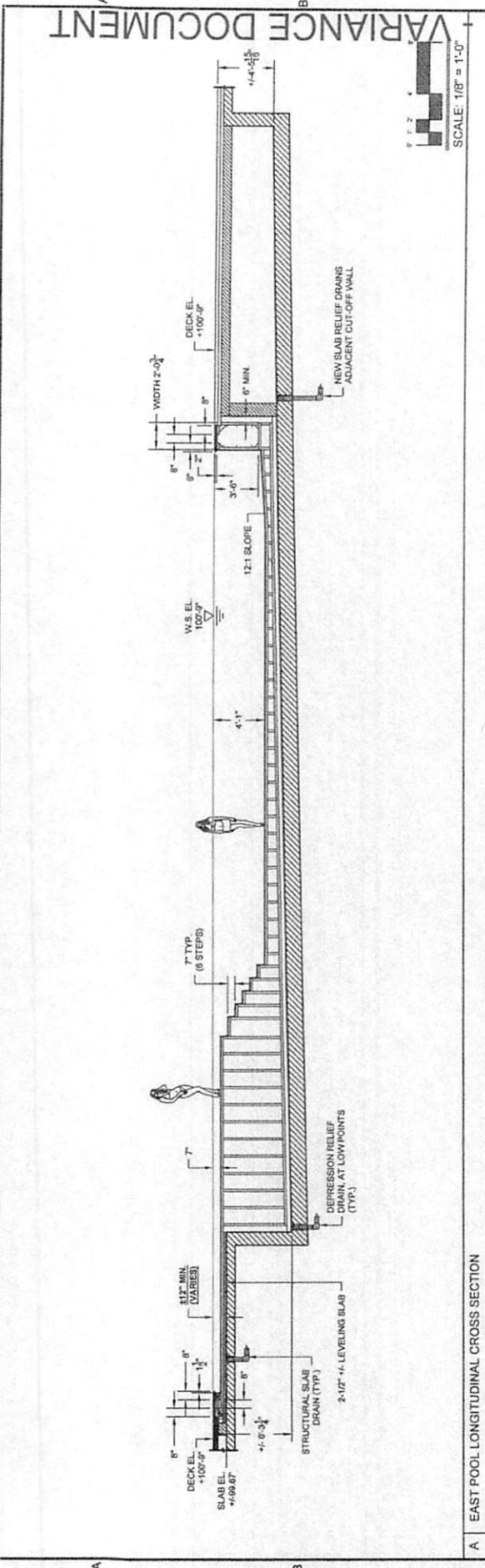
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TAX DIST 470

ATTACHMENT

F

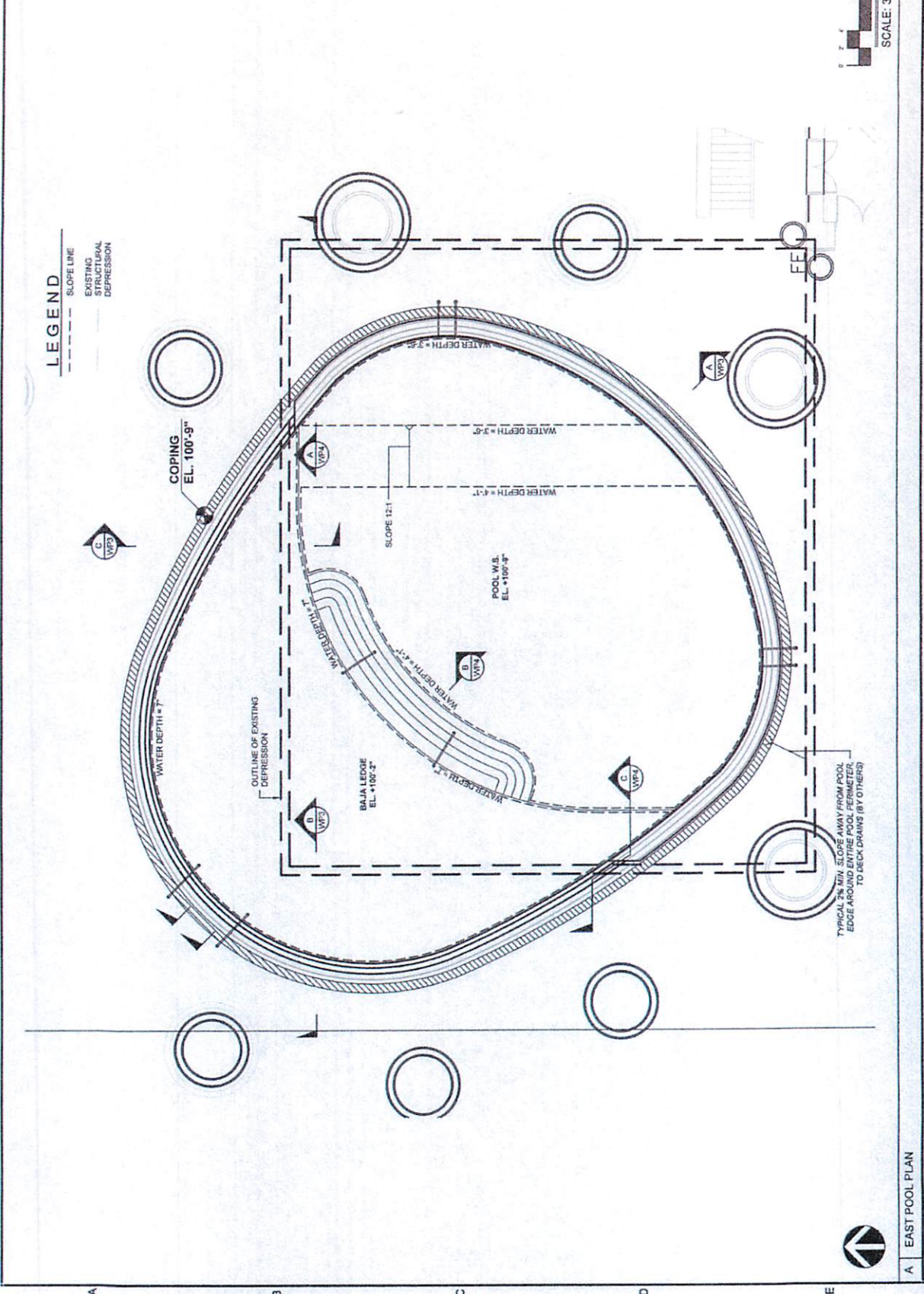


VARIANCE DOCUMENT

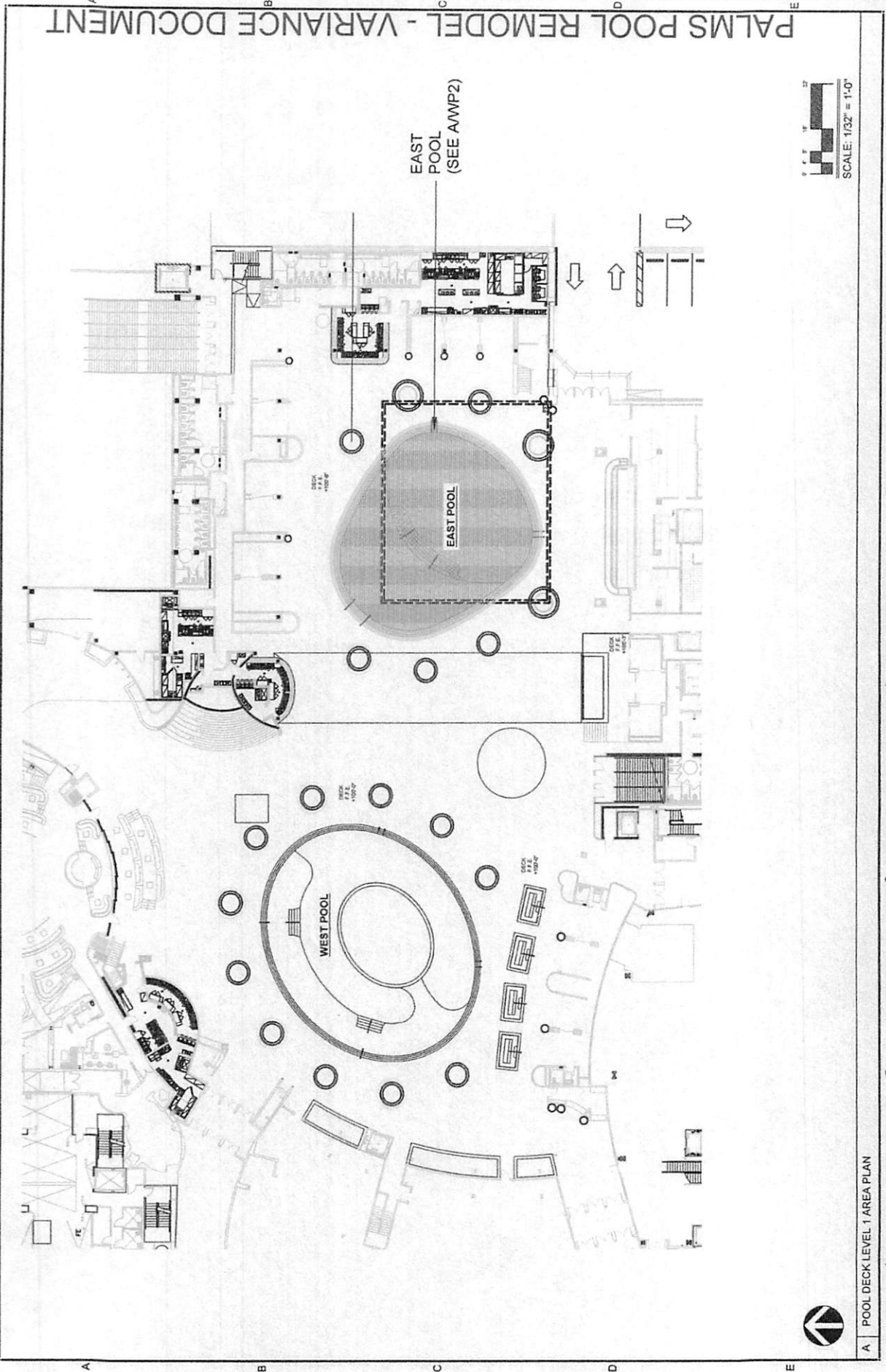
PALMS POOL REMODEL

1 2 3 4 5 6 7

A B C D E



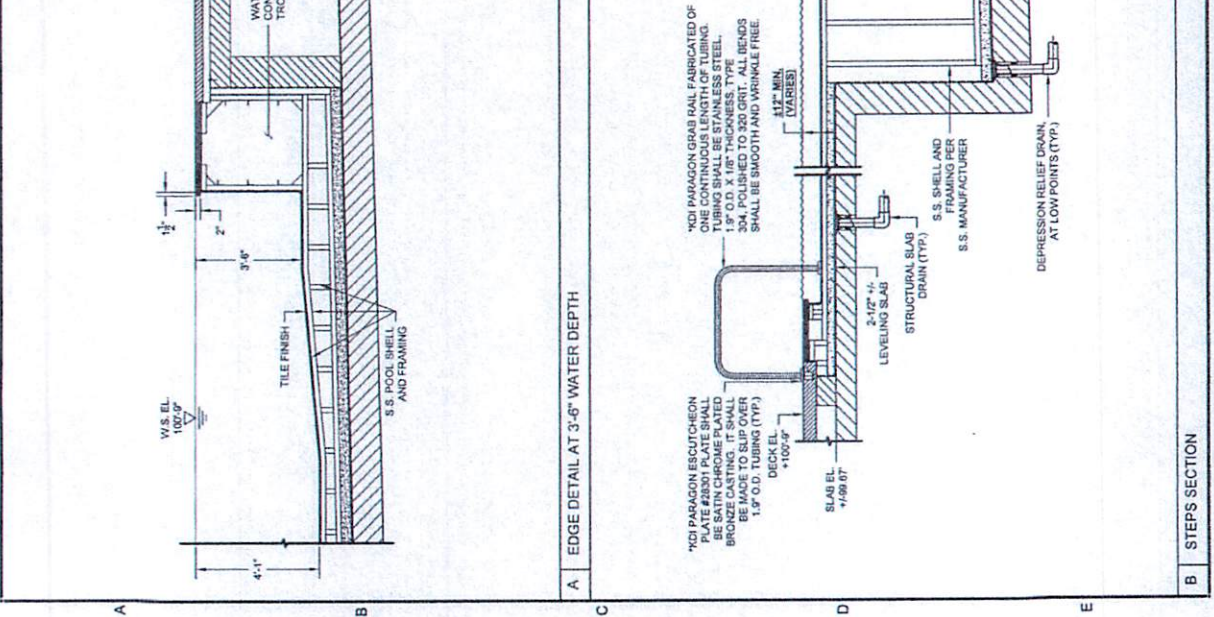
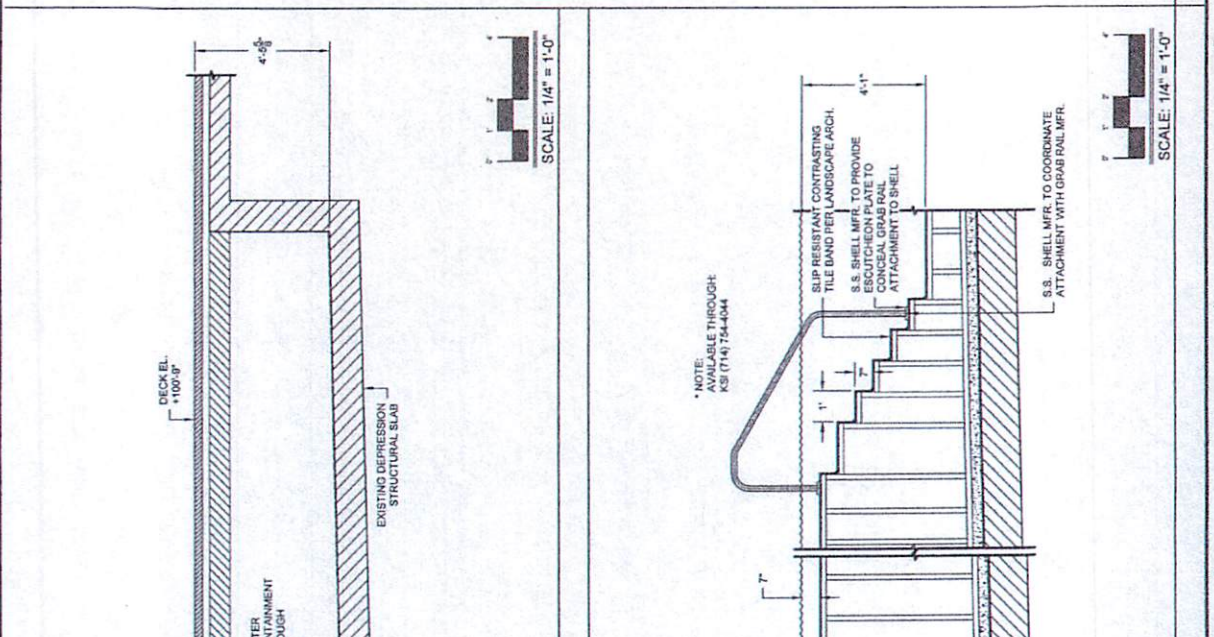
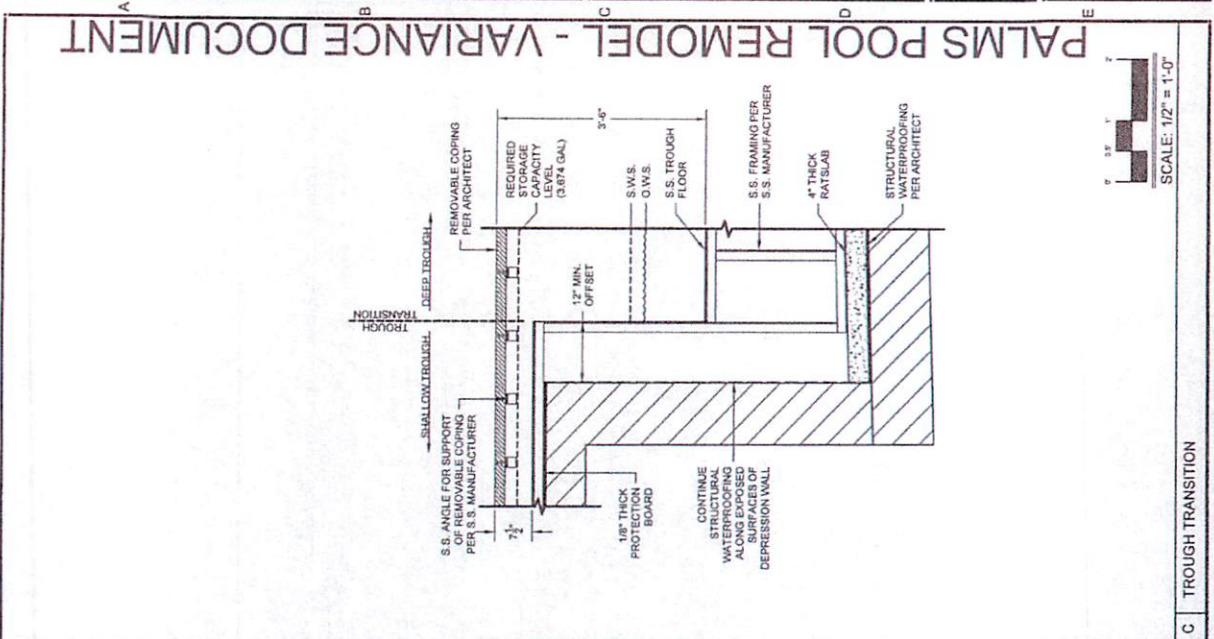
A EAST POOL PLAN



SCALE: 1/32" = 1'-0"
 NORTH ARROW



A POOL DECK LEVEL 1 AREA PLAN

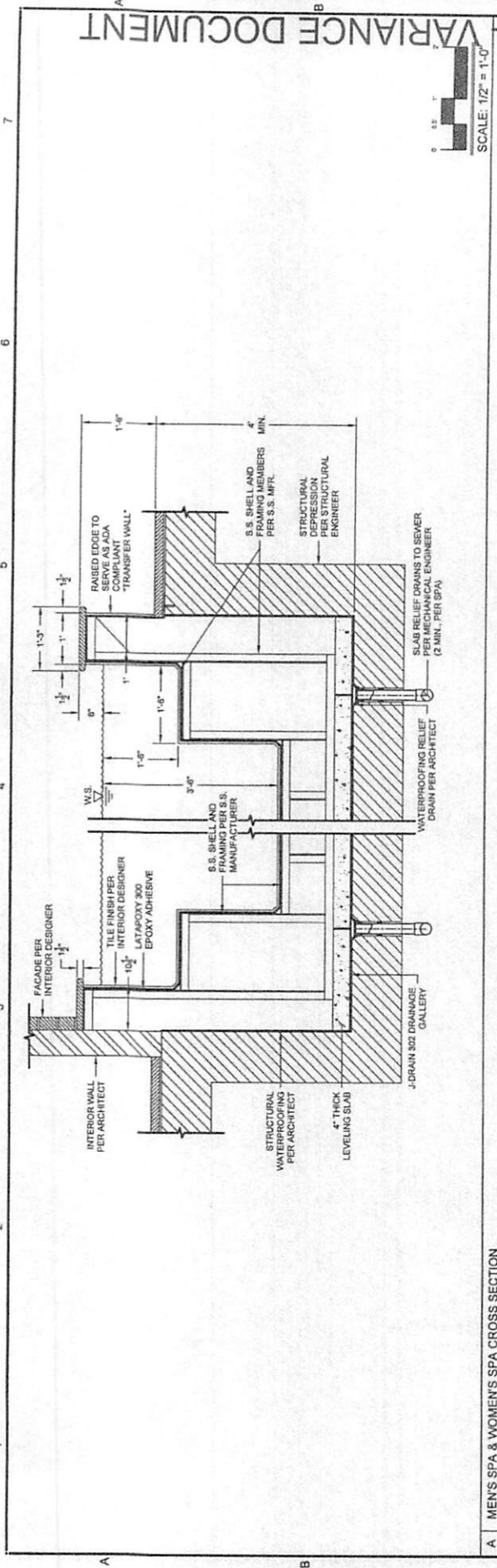


FRIEDRICH GROUP
 ARCHITECTURAL DESIGN & INTERIOR DESIGN
 1000 WEST FLORISSANT AVE. SUITE 200
 LAS VEGAS, NV 89102
 TEL: 702.735.1111 FAX: 702.735.1112

STO DESIGN GROUP, INC.
 1000 WEST FLORISSANT AVE. SUITE 200
 LAS VEGAS, NV 89102
 TEL: 702.735.1111 FAX: 702.735.1112

PALMS SPA REMODEL
 STATION CASINOS
 4321 W. FLORISSANT RD.
 LAS VEGAS, NV 89103

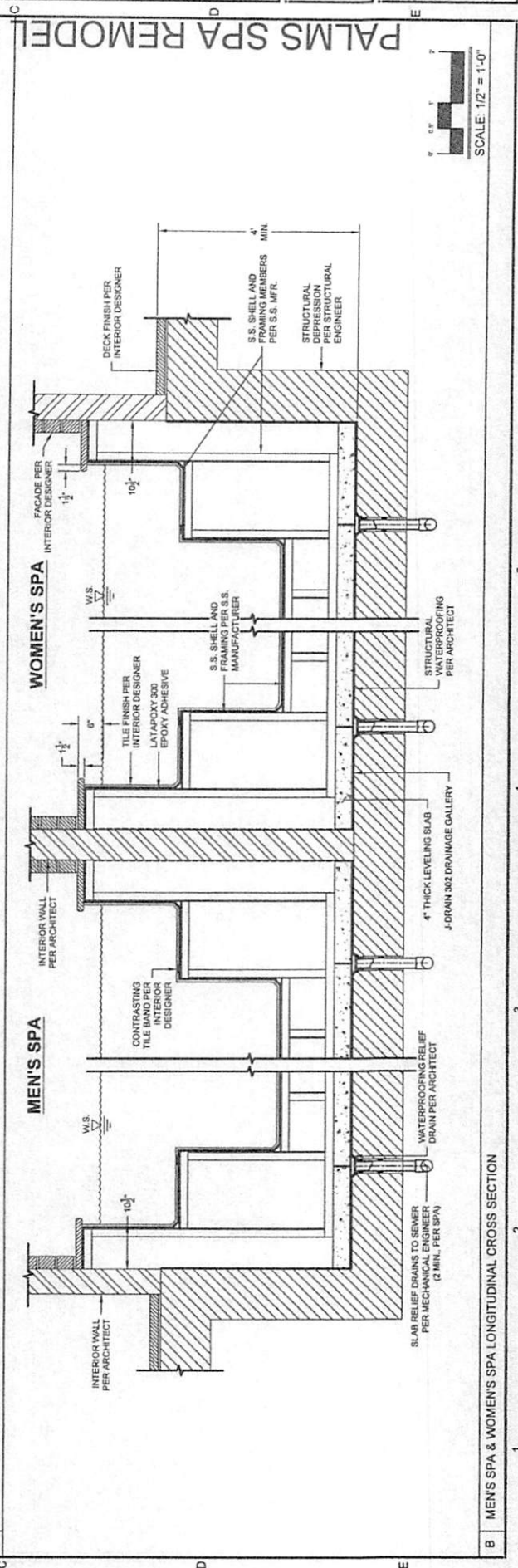
WSP
 WSP DESIGN GROUP
 1000 WEST FLORISSANT AVE. SUITE 200
 LAS VEGAS, NV 89102
 TEL: 702.735.1111 FAX: 702.735.1112



A MENS SPA & WOMEN'S SPA CROSS SECTION

SCALE: 1/2" = 1'-0"
 0 0.5 1 2

PALMS SPA REMODEL VARIANCE DOCUMENT

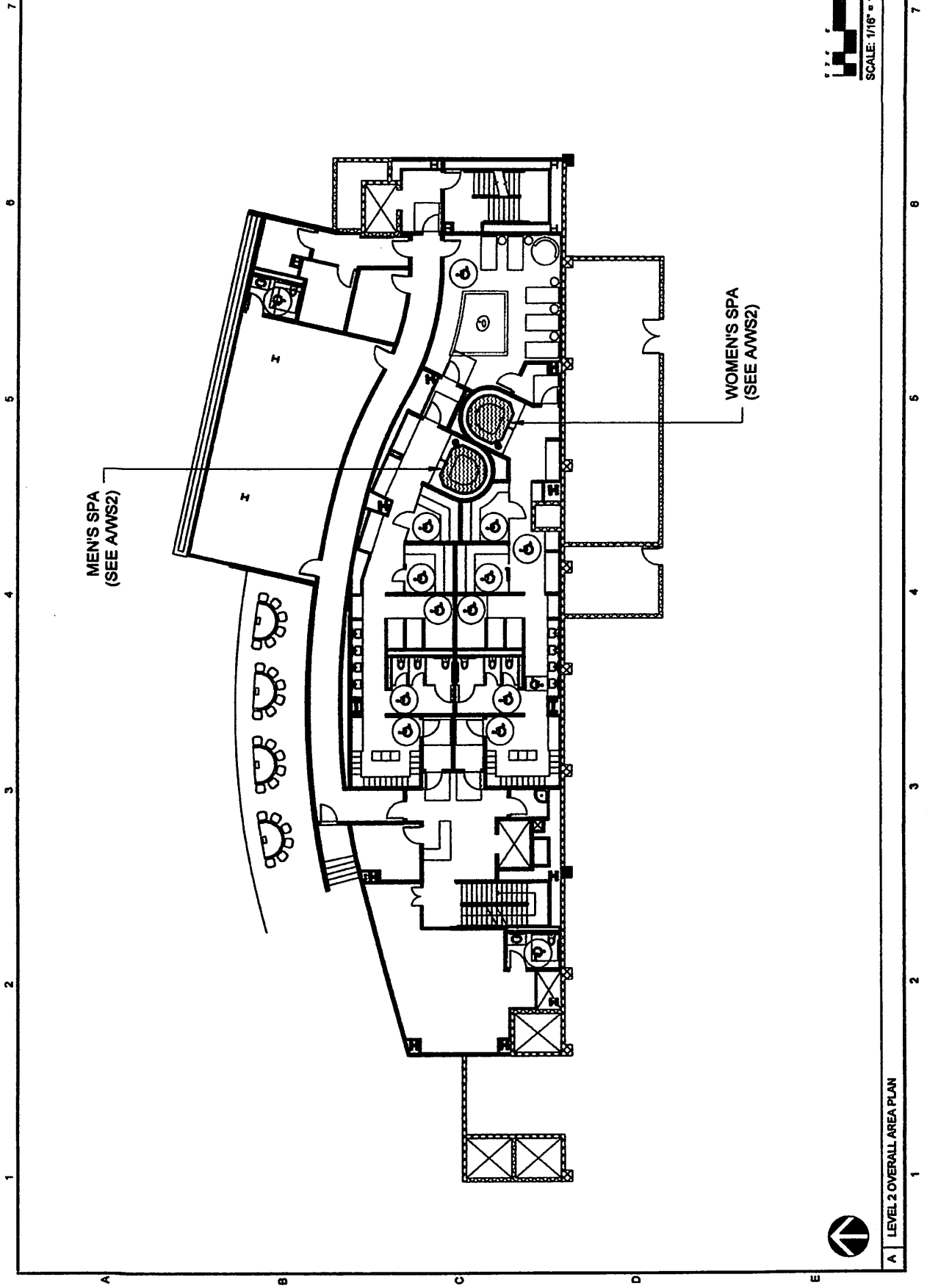


B MENS SPA & WOMEN'S SPA LONGITUDINAL CROSS SECTION

SCALE: 1/2" = 1'-0"
 0 0.5 1 2

WS1 DATE: 11/11/11 DRAWN BY: [illegible] CHECKED BY: [illegible]	PALMS SPA REMODEL STATION CASINOS 4271 W FLAMINGO AV LAS VEGAS, NV 89103	PALMS STATION CASINOS GROUP, INC. 1000 LAS VEGAS BLVD LAS VEGAS, NV 89101		
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PALMS SPA REMODEL - VARIANCE DOCUMENT

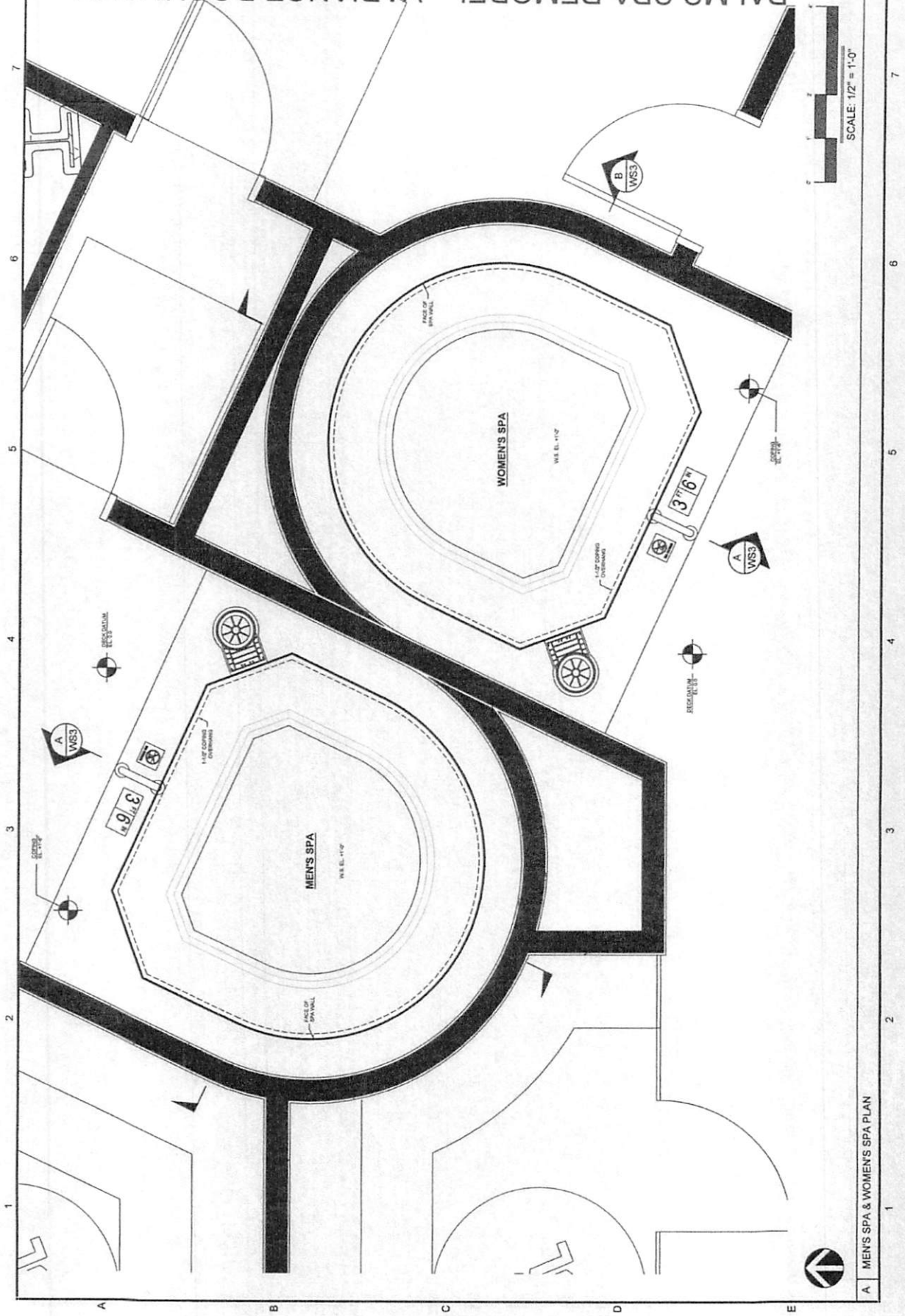


SCALE: 1/16" = 1'-0"

A LEVEL 2 OVERALL AREA PLAN

WS2 SPA PLAN STATION KANSAS ACT 14 - LAMARFIELD HLL LAS VEGAS, NV 89103 PALMS SPA REMODEL	PALMS STIO DESIGN GROUP, INC. 1000 S. LAS VEGAS BLVD. SUITE 100 LAS VEGAS, NV 89101 PHONE: 702-735-1234 FAX: 702-735-1235 WWW.PALMSDESIGN.COM		FRIEDMUTTER GROUP ARCHITECTS & INTERIORS 1000 S. LAS VEGAS BLVD. SUITE 100 LAS VEGAS, NV 89101 PHONE: 702-735-1234 FAX: 702-735-1235 WWW.FRIEDMUTTERGROUP.COM
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PALMS SPA REMODEL - VARIANCE DOCUMENT



SCALE: 1/2" = 1'-0"

A | MEN'S SPA & WOMEN'S SPA PLAN

ATTACHMENT

G



PUBLIC NOTICE

The Southern Nevada Health District Board of Health will conduct a PUBLIC HEARING on June 28, 2018 at 8:30 a.m. during its monthly meeting held at 280 S Decatur Blvd, Las Vegas, NV 89107, to approve or deny a variance request to operate public bathing places not in compliance for FP Holdings LP, DBA Palms Casino Resort, located at 4321 West Flamingo Rd, APN 162-19-501-004. Note, if this application is not presented at the June 28, 2018 meeting, it will be presented at the July 26, 2018 meeting.

The variance request is made to allow the Petitioner to operate public bathing places – the east pool as well as the men’s and women’s hot spas – not in accordance with the Nevada Administrative Code (NAC) 444 Public Bathing Places and Public Spas. The request allows the east pool to be constructed not in compliance with NAC 444.128.7 – ladders and stairs; and the hot spas to be constructed not in compliance with NAC 444.442 – Steps, ladders, treads and handrails required and NAC 444.454.1 – Decks: Dimensional design.

Interested persons may appear at the public hearing and present their views thereon. Written comments will also be considered by the Southern Nevada Health District Board of Health and must be forwarded to Jeremy Harper, Environmental Health Supervisor for the Aquatic Health Program, Southern Nevada Health District, P.O. Box 3902, Las Vegas, Nevada 89127-3902, or via email at harper@snhd.org, no later than June 21, 2018. The variance application request is available for review at the Southern Nevada Health District, Environmental Health Division, 333 N Rancho Drive, Las Vegas, NV 89106.

If there are special viewing needs, please contact Bonnie Archie at (702) 759-0572 or archie@snhd.org to schedule an appointment to review the permit application during normal business hours of 8:00 a.m. to 4:00 p.m. Copies of the documents may be requested during that time for \$1.00 per page.

-S-

Herbert L Sequera, Environmental Health Director
Southern Nevada Health District

June 7, 2018

Date