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**Real Estate: Construction
Development
Investment
Management**

SDA

October 24, 2006

Nathan Goldberg
City of Las Vegas
Planning Department
731 S. Fourth
Las Vegas, Nevada 89101
Telephone: 702-229-5447
Facsimile: 702-385-7268

Re: Bridger Avenue Apartments, Variance Parking

Dear Mr. Goldberg:

This letter serves as our Justification Letter on the above referenced submittal, as described herein:

VARIANCE PARKING

Since this project targets 'downtown employees' and seniors, the need for parking spaces, in our opinion, is much smaller than prescribed by the City code requirement. We are proposing a parking need of 0.5 spaces per unit. Our building consists of 188 one-bedroom units and 112 studios. All units have the efficiency type arrangements for high density urban living. It is our opinion that most residents will not have a vehicle, using mass transportation or simply walking to work.

The precedent we set with the adjacent City Center Apartments proved that 0.5 parking spaces per unit seem sufficient. At the City Center Apartments, which has 300 units, there are 150 parking spaces and have never had a shortage of parking. We would like to reduce the parking count requirement for the new project to 150 spaces, the same level as it was approved for the City Center Apartments.

We request the relaxation of current parking requirements as it will allow us to proceed with a project that will not only become an integral part of the downtown Las Vegas urban fabric, but will also provide a customer base for future mixed-use developments in the area.

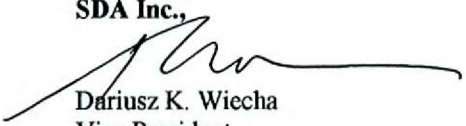
In addition to 200 parking spaces currently shown on our plans and dedicated for the new complex residents, we are making 33 additional spaces available to city employees via a direct agreement with the city.

This project fits the General Plan use. If approved, it will allow for construction of a multi-unit apartment complex, similar in nature to the neighboring City Center Apartment Complex, also owned by our company.

Based on the popularity of the City Center Apartments and virtually non-existing vacancy rates we are convinced that a property of similar character next door will greatly contribute to the urban success of downtown Las Vegas by providing affordable housing to inner city dwellers.

Sincerely,

SDA Inc.,


Dariusz K. Wiecha
Vice President

DKW/ls

ZON-17740 VAR-17741
VAR-17742 VAR-17743
SDR-17745 12/07/06 PC