



AND ASSOCIATES, INC.

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Vice President
Planning and Development Services

April 5, 2007

Planning Department
City of Las Vegas

Dear Ladies/Gentlemen:

Please accept this as a summary justification letter, supported by detailed studies separately submitted, for the creation of a Gaming Enterprise District within an overall approximate 70 acre mixed-use project in the area generally bounded by Charleston, Main, Wyoming and the UPRR. Only a portion of the described property is eligible for Gaming Enterprise District status; the applicant will provide appropriate legal descriptions and/or make such boundary line adjustments as are necessary to comply with all relevant separation standards.

The Nevada Revised Statutes set forth the standards by which local governments may create/expand Gaming Enterprise Districts. The applicant believes the subject application complies with those standards, as follows:

1. "The roads, water, sanitation, utilities and related services to the location are adequate". Separate reports are being prepared in the DINA format to demonstrate full compliance with these issues. The applicant understands that he will nonetheless be responsible for improvements to the infrastructure in the area as a result of the project's overall impacts. Pursuant to the NRS, if additional evidence is required it can and will be presented at the hearing on the project.
2. "The proposed establishment will not unduly impact public services, consumption of natural resources and the quality of life enjoyed by residents of the surrounding neighborhoods". The character of the neighborhood is already one of mixed commercial and residential uses. The subject project will simply replace older mixed uses with a coherent master-planned mixed-use project including a gaming component. A resort hotel with its typical amenities will enhance the neighborhood and quality of life for the pockets of residential uses within the area.
3. "The proposed establishment will enhance, expand and stabilize employment and the local economy". The separately-submitted economic analysis will show that the proposed project, including the gaming component, will be the major employment and economic force in this part of the City of Las Vegas for many years.
4. "The proposed establishment will be located in area planned or zoned for that purpose pursuant to NRS 278.010 to 278.630, inclusive". A General Plan Amendment will be processed to satisfy this requirement.

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GED justification

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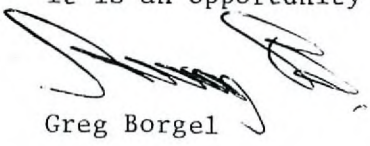
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5. "The proposed establishment will not be detrimental to the health, safety or general welfare of the community or be incompatible with the surrounding area". The gaming component will be fully integrated into the proposed mixed-use community and constructed to comply with all of the City's regulations as to health and safety. As an integrated element of an overall project, the gaming component will be designed to be fully compatible with its surroundings.

6. "On the date that the petition was filed, the property line of the proposed establishment was not less than: (1) Five hundred feet from the property line of a developed residential district; and (2) Fifteen hundred feet from the property line of a public school, private school or structure used primarily for religious services or worship". An appropriate survey is being provided demonstrating that the required separations will be met.

7. "The proposed establishment will not adversely affect: (1) a developed residential district; or (2) A public school, private school or structure use primarily for religious services, whose property line is within 2,500 feet from the property line of the proposed establishment." All such facilities are either already located in a mixed-use environment as described above, or are on the other side of UPRR/I-15 or across an arterial and therefore isolated from any negative impacts of the project. More generally, the overall project and its gaming component will bring additional residential, recreational, and commercial opportunities to the area and will therefore be a benefit rather than a detriment to the surroundings.

Finally, and independent of any showing required by statute, it should be noted that the Gaming Enterprise District is consistent with recent practice in the development of large mixed-use projects. Presently in nearby unincorporated Clark County two large similar projects (MGM City Center and Echelon) are underway with more than \$11 billion in investment contemplated. This type of integrated project relies on the gaming component and its amenities as attractions for the residents and visitors to the overall project. The subject site is one of a limited number of locations where the City of Las Vegas can benefit from such development; it is an opportunity that should be welcomed by the community.



Greg Borgel

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