

LAW OFFICES

BALLARD SPAHR ANDREWS & INGERSOLL, LLP

BANK OF AMERICA PLAZA
300 SOUTH FOURTH STREET, SUITE 1201
LAS VEGAS, NEVADA 89101
702-471-7000
FAX: 702-471-7070
WWW.BALLARDSPAHR.COM

PHILADELPHIA, PA
BALTIMORE, MD
BETHESDA, MD
DENVER, CO
LOS ANGELES, CA
PHOENIX, AZ
SALT LAKE CITY, UT
VOORHEES, NJ
WASHINGTON, DC
WILMINGTON, DE

BILL CURRAN

DIRECT DIAL: (702) 471-7000

PERSONAL FAX: (702) 471-7070

E-MAIL: CURRANB@BALLARDSPAHR.COM

September 10, 2007

By Hand Delivery

Margo Wheeler
Director
City of Las Vegas
Planning and Development Department
731 South Fourth Street
Las Vegas, NV 89101

Re: **JUSTIFICATION LETTER**
Application for General Plan Amendment, Rezoning and Site
Development Plan Review
APN: 139-19-705-001
SEC of Rancho Drive and Coran Lane

Included with this Justification Letter please find the required application materials for an application for the approval of a multifamily residential development proposed for the approximately 24.14 acre parcel located at the south east corner of Rancho Drive and Coran Lane within the City of Las Vegas (APN 139-19-705-001). The project proposes 23 buildings with a mix of 180 one bedroom and 373 two bedroom units, for a total of 552 units, or 22.87 dwelling units per gross acre. The application contemplates an amendment to the General Plan from the existing Service Commercial designation to Multifamily, a zone change from C-2 to R-3, and a Site Development Plan Review.

The density and intensity of the proposed amendment is compatible with the existing adjacent land use designations, and the approval of the GPA will assist the City in bringing conformity to an area in which the current zoning does not comply with the General Plan. Although the General Plan for the site is Service Commercial, the site is currently zoned C-2 dating back to the County's designation of Rancho Drive as a C-2 corridor. While the subject parcel is within the City of Las Vegas' limits, property in the immediately surrounding area is within the borders of the City of Las Vegas, Clark County and the City of North Las

ZON-24491
10/25/07 PC

RECEIVED
SEP 11 2007

Vegas. The borders of each jurisdiction are not particularly tidy (see attached zoning maps) making it a difficult area to promote a long term, cohesive plan. It is also significant that this is an in-fill project that will put a challenged parcel to productive use.

The R-3 multi-family use proposed for this project represents a use which will be compatible with the existing adjacent development. Several properties in the area carry similar multi-family designations, including the properties directly to the east of the subject parcel which carry zoning designations of R-4 and R-3. Several "mixed use" type projects have also been approved for area. A large multi-family complex also represents an appropriate buffer between the property developed as single family residential and the Texas Station which is directly north of the proposed project. The site design meets all required setbacks for the proposed zoning district, including any applicable residential adjacency standards from properties developed for single family residences.

The property's location on Rancho presents an ideal location for a multi-family complex with access to public transportation and services readily available. Further, with the recent changes in the real estate market, multi-family living is increasingly important for the City's growing work force as financing has become much less available to both developers and prospective purchasers of single family homes. The size of the property and number of units will help assure that there will be professional management to insure that the property is managed and maintained at a high level after it is developed.

Additional commercial development along Rancho would be difficult, not only because of the development of a nearby Wal-Mart, but because such a development would require numerous driveways with in and out traffic on a heavily traveled major thoroughfare. The requested multi-family development can be limited to a single access point on Rancho, with appropriate deceleration and acceleration lanes and a bus turnout.

A well-planned project on a long-vacant parcel promotes the public health, safety and welfare of the community. The transitional R-3 development will serve the area more appropriately than its existing C-2 designation, and will not burden the area in a manner which was not anticipated by the General Plan. The project will include a variety of amenities including open space designed for the enjoyment of the residents, such as pools, play areas, and a recreation building. The site meets the Title 19 parking standards with 970 spaces provided where 968 are required, as well as the requirements of the fire code.

Sincerely,



Bill Curran

WPC:cw
Enclosures

ZON-24491
10/25/07 PC

RECEIVED
SEP 11 2007