

April 15, 2013

Steve Swanton, AICP
Senior Planner
Department of Planning
City of Las Vegas
333 N. Rancho Drive
Las Vegas, NV 89106

Subject: Justification Letter

Project Description: DT3R Mixed Use Development – Stewart Ave and Casino Center Blvd

Parcels 139-34-501-004 and 139-34-501-008

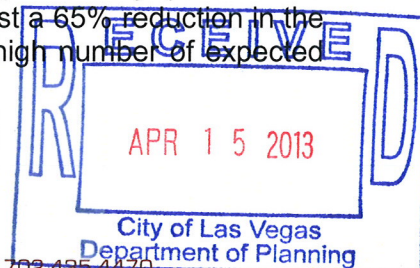
To Whom It May Concern,

Please accept this document as the required justification letter for the Site Development Plan Review for a Mixed Use development following the Disposition and Development Agreement between the City of Las Vegas and the CIM Group (POB Las Vegas LLC).

The proposed development located on the site of the Old Downtown Transportation Center shall include 80,000 square feet of Retail and Food & Beverage establishments and approximately 15,000 square feet of Conference Space as well as support functions. Although we discussed a larger project during our Pre-Application Conference on March 21, 2013, upon further consideration, we have opted to submit a project with slightly less density for this first phase so as to allow maximum flexibility to expand the project in future phases. The proposed development will further revitalize the downtown and invigorate the plaza surrounding the Mob Museum creating destinations for tourist and local pedestrian traffic from the Freemont and Third Street Hotels and nearby offices and residences.

As a large percentage of the customer base for this project will be from surrounding businesses such as the Downtown Grand, Zappo's, and other downtown hotels and casinos within walking distance, we request that the parking calculation reflect this. We have indicated in the parking calculation for the retail space, a factor of 3.5 spaces per 1000 square feet, which we understand to be the generally established "rule of thumb" for projects covered by the Downtown Centennial Plan. Furthermore, we have indicated in the parking calculation for the conference center a factor of 1 space per 100 square feet, which we understand to be the requirement for a banquet facility (there is no specific parking calculation for a conference center). We request a 65% reduction in the required parking spaces for the conference center due to the high number of expected pedestrian clientele from the surrounding downtown area.

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The CIM Group has developed several exciting projects in the Downtown area including the Triple George Grill at 201 N. Third Street, the Mob Bar located at 201 N. Third Street and the Downtown Grand 206 N. Third Street. The hours of operation and number of employees shall be determined by the final Tenants at the Retail and Food & Beverage Spaces. All required liquor and/or gaming licenses shall be the sole responsibility of the future tenants.

Should you have any questions or concerns, please do not hesitate to contact our office (702) 435-4448.

Sincerely,



Diana Payne
Associate Principal



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