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August 27, 2024

VIA UPLOAD

CITY OF LAS VEGAS PLANNING AND ZONING
333 North Rancho Drive
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Las Vegas, Nevada 89106

**Re: *Justification Letter – General Plan Amendment, Zone Change,
Site Development Plan Review, and Special Use Permits to Allow
for On-Premises Consumption of Alcohol, Assisted Living,
Senior Citizen Apartments, and Convalescent Care/Nursing
Home
Confluent Development, LLC
APN: 138-31-210-008***

To Whom It May Concern:

This firm represents Confluent Development, LLC, (the "Applicant") in the above referenced matter. The proposed project is located on approximately 3.67 acres on Hualapai Way, just north of Alta Drive (the "Property"). The Property is more particularly described as Assessor's Parcel Number 138-31-210-008. The Property is zoned Medium Density Residential (R-3) with a general plan of High (H). By way of background, the Las Vegas City Council approved 21-0511-GPA changing the Property's general plan to H and 21-0511-SDR1 allowing a senior living development consisting of senior citizen apartments, assisted living apartments, and convalescent care units consisting of a total of 168-units.

The Applicant is nearly complete with the construction of the senior living development. In addition to the food plan the Applicant's residents may choose, the Applicant's would also like to have the ability to offer a beverage plans that includes on-premises consumption of alcohol. Even though the approved site plan remains exactly the same, the Applicant is requesting an amendment of the general plan to Service Commercial (SC) and a zone change to C-1 so that the Applicant can also request a special use permit to allow on-premises consumption of alcohol. A senior living development in the SC master plan and corresponding C-1 zoning district is compatible with surrounding medical uses.

GENERAL PLAN AMENDMENT & ZONE CHANGE

A change to the general plan to SC and the corresponding zone change to C-1 are appropriate and compatible for the following reasons:

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1. The Property is adjacent to commercial designated properties. Specifically, there are existing C-1 office complex to the south and vacant C-V zoned property to the north and east. An SC general plan and C-1 zoning are consistent with the intensity of the existing and proposed uses.
2. The Property is located on Hualapai Way. Hualapai Way is a 100', major arterial right-of-way specifically designed to accommodate slightly more intense uses such as office uses and commercial uses.
3. There are large buffer areas between the Property and existing single-family residential uses including Hualapai Way, Alta Drive, and the City's park/trail network to the north of the Property.

Therefore, a general plan amendment to SC and a zone change to C-1 are justified and reasonable.

SITE DEVELOPMENT PLAN REVIEW

As mentioned above, the construction of the senior living development is nearly complete. As a recap, the Applicant is building a 168-unit senior living development consisting of 95-senior apartments, 49-assisted living units, and 24-convalescent care units. The Applicant are two (2) driveways from Hualapai Way to the Property – one on the southern end of the Property and another one on the north end of the Property. The Applicant is constructing a single, four-story, 55' tall building located within the center of the Property. The building height and number of stories complies with the C-1 zoning district requirements. The building is comprised of painted stucco, cultured stone, large decorative windows and architectural pop outs and enhancements. There are 138 parking spaces provided where 116 are required. Landscaping is provided to meet or exceed code along the perimeter and through the Property to ensure adequate shading and visual relief. The project also includes various amenities for the residents, including a pool and indoor and outdoor activity spaces.

The impacts on the community will be significantly less, especially with respect to traffic (the majority of residents within the senior project do not drive or have cars) and noise. Therefore, the proposed site plan and senior living development is compatible with the area and appropriate for the Site.

SPECIAL USE PERMITS

- **Alcohol, On-Premises Full**

With a special use permit approval in a C-1 zoned district, on-premises consumption of alcohol is allowed. As part of the residents' food plan, the Applicant would also like to provide a beverage option that includes on-premises consumption of alcohol. This added amenity will make the development more competitive with other senior living facilities as well as provide the residents' and their guest a nice amenity. Further, the entire northeast corner of Hualapai Way and

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Alta Drive is commercially developed consisting of professional offices including medical and legal. The nearest residential property is separated by a Hualapai Way, a 100-foot right-of-way. Therefore, on-premises consumption of alcohol is compatible with the development and the area.

- **Assisted Living, Senior Citizen Apartment, and Covalence Care/Nursing Facility**

As indicated above, the approved senior living development is comprised of 95-senior apartments, 49-assisted living units, and 24-convalescent care units. The number of units and the design of the nearly completed project remains identical to the approval via 21-0511-SDR1. Rather, the only requested changes are to a commercial general plan and zoning to allow for the alcohol, on-premises full use on the Property. Like an alcohol, on-premises full use, with special use permit approval, an assisted living and convalescent care/nursing facility are allowed in a C-1 zone district. The proposed assisted living and convalesce care/nursing facility uses are compatible with the surrounding medical uses. A special use permit is also required for a senior citizen apartment since some of the units will be on the ground floor.

Thank you in advance for your consideration. Please do not hesitate to let me know if you have any questions or concerns.

Sincerely,

KAEMPFER CROWELL



Anthony J. Celeste

AJC/jmd

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