

December 19, 2024

**VIA ELECTRONIC UPLOAD**

City of Las Vegas Planning Department  
495 S. Main Street 3<sup>rd</sup> Floor  
Las Vegas, NV 89101

**Re: Justification Letter for Proposed Development on the former Badlands Golf Course  
APNs 138-31-201-005, 138-31-601-008, 138-31-702-003, 138-31-702-004, 138-31-801-002, 138-31-801-003, 138-32-301-007, 138-32-301-005, 138-32-210-008 138-31-712-004  
and 138-32-202-001**

To Whom It May Concern:

Please be advised our office represents the applicant Lennar Homes (“Applicant”) in the above-referenced matter. The Applicant is proposing to development approximately 255 acres, more particularly described as assessor’s parcel numbers 138-31201-005, 138-31-601-008, 138-31-702-003, 138-31-702-004, 138-31-801-002, 138-31-801-003, 138-32-301-007, 138-32-301-005, 138-32-210-008, 138-31-712-004 and 138-32-202-001 (the “Property”), for single family detached, single family attached and multifamily homes. The Property is currently zoned R-PD7 and R-3. In April, the Nevada Supreme Court upheld the lower court’s determination that R-PD7 zoning exists on the Property<sup>1</sup>. The lower court(s) specifically ruled that single family and multifamily residential uses were legally permissible uses in R-PD7 (allowing up to 7 units per acre) and in R-3 zones. The Applicant is now proposing a development that is consistent with the existing zoning with a proposed overall density well under 7 units per acre.

General Plan Amendment to Planned Community Development (PCD)

The Applicant is requesting an amendment to the general plan to PCD to allow for the proposed development of the Property with PD zoning. The existing zoning on the Property predated the PR-OS designation, so it is necessary and appropriate that the PR-OS be removed. The Nevada Supreme Court has specifically rejected “any assertion that the PR-OS land designation overrides the R-PD7 zoning<sup>2</sup>.” With the development of the entire Property under the requested PD zoning, it is appropriate that the land use designation be changed to PCD.

Zone Change to PD

The Applicant is requesting a zone change on the entire Property to PD zoning. Under Las Vegas Code 19.10.040, the intent of the PD zoning district is to allow comprehensively planned developments to provide for the orderly and creative arrangement of land uses that are harmonious and beneficial to the community, to provide for a variety of housing types, to provide flexibility in density, to provide for a uniform set of standards for development, and to contribute to the health, safety and general welfare of the community. The PD zoning designation is the most appropriate for the proposed development of this

<sup>1</sup> See *City of Las Vegas v. 180 Land Co., LLC*, 546 P.3d 1239 (Nev. 2024).

<sup>2</sup> Id. at 1248.

**24-0629**  
01/02/2025

Property because it will allow the flexibility to develop different housing types with a blend of densities that are compatible and harmonious to the area, and consistent with the pattern of development in the area. The Applicant is proposing a comprehensive development plan with a mix of lot sizes, housing types, and options for the benefit of the City. The Property has sat vacant and unused for several years. The proposed development will significantly contribute to the overall health, safety and welfare of the community.

The Applicant has submitted a Development with 1,480 homes. There will be varying single family detached homes throughout most the Property with the multifamily homes on the eastern end of the Property, consistent with the surrounding development. The overall density is approximately 5.84 units per acre, which is well below the current allowed density. There will be ample open space with over 100 acres of open space and with future resident amenities provided<sup>3</sup>. Access to the community will be via private gates off of Hualapai Way<sup>4</sup>, Alta Drive, Rampart Boulevard and Charleston Boulevard. The community will not share any access with the existing Queensridge development. The internal street network will be private and maintained by a new community HOA. Any cul de sacs over 600 feet will either have secondary access points or have the required 116-foot diameter turnaround. The perimeter of the community will have ample landscaping with community-themed features and walls. There will be significant buffer areas around the existing Queensridge homes including landscaped buffer areas, wide landscaped drainage areas, landscaped street networks, and varying elevations in grade. The Applicant is proposing its own Development Standards and Design Guidelines that will exceed the City's standards to create a special, new and unique community on the Property. The Design Guidelines provide exceptional architecture, design and overall concepts for the community. The Applicant has successfully developed the Master Planned Community of Sunstone within the City of Las Vegas with similar Design Guidelines. Overall, the proposed development plan will significantly improve the area with a new, updated, first-rate community that will complement the existing area.

#### Tentative Map

The Applicant has submitted a corresponding tentative map meeting all of the requirements of NRS 278 and Las Vegas Code 19.16.050. The tentative map conforms to the proposed PD zone and development plan.

#### Site Development Review

A site development plan review has been submitted for the project as required by Las Vegas Code 19.10. The plan is consistent with the PCD general plan and the PD zoning and development plan, most importantly the Development Standards and Design Guidelines. There are 1,480 homes proposed on the Property. Most of the Property (the western 2/3 of the Property) is planned for 559 single family detached homes with varying lot sizes and product types. The lots will range in size from 10,000 square foot lots near the larger existing adjacent homes to 3,600 square foot lots closer to the multifamily housing. There will be a variety of housing product options to create a truly balanced development plan. The Applicant has also provided and planned for buffer areas between the existing homes and the proposed new single family homes with landscaping, landscaped drainage areas, and elevation variation. The proposal is harmonious and compatible with the surrounding area and far less dense than what is currently allowed with the existing R-PD7 zoning.

---

<sup>3</sup> A credit will be given towards the open space calculations for certain encroachments onto the Property.

<sup>4</sup> Currently, the Hualapai access points will be right-in/right-out only.

24-0629  
01/02/2025

The eastern portion of the Property will have 921 single family attached homes and multifamily condominiums. Approximately 148 of the multifamily homes are for-sale, three story condominium homes proposed near the corner of Alta Drive and Rampart Boulevard, with access from both of those major streets. There will be four-plex and eight-plex condominium homes with modern architecture, natural earth tones and architectural enhancements. There is existing multifamily to the north with the high-rise Queensridge Towers. There is also existing for-rent multifamily to the east across Rampart Boulevard. The proposed multifamily is certainly appropriate and compatible in this area and is far less intense than the existing adjacent multifamily housing.

Overall, the proposed development plan on the Property is consistent, compatible and will be a tremendous asset to the surrounding area. There are varying housing options from high-end homes to multifamily condominiums. The development plan creates a unique, modern, state-of-art development that is compatible and harmonious with the existing housing options in the area.

Thank you in advance for your time and consideration regarding this application. Please feel free to contact me should you have any questions or concerns.

Sincerely,

Kaempfer Crowell



Stephanie H. Gronauer

24-0629  
01/02/2025