

March 2, 2026

Gardnerville Town Board
Attention: Erik Nilssen, P.E., Town Manager
1407 Highway 395 N.
Gardnerville, NV 89410

RE: VA Medical Clinic at Larson Way (APN 1220-10-510-012) – Major Design Review Application DP26-0003

Dear Mr. Nilssen and Members of the Town Board,

On behalf of the Owner, VA Larson Way Gardnerville, LLC, we submit this formal response regarding the Major Design Review (MDR) for the proposed 18,000-square-foot Veterans Affairs medical clinic. While the applicant concurs with the Staff’s finding that the project is a "welcome addition" to the South Gateway’s burgeoning medical hub, we must formally challenge recommended Conditions 6, 7, 8, and 10.

These conditions, while well-intentioned, fail to account for the "advisory" nature of the Gardnerville Design Guidelines and overlook the critical operational and safety requirements of a federal healthcare facility. Per the Introduction to the Guidelines (p. 7), the document is intended to "increase the amount of discussion about HOW projects address design policies" and serves as a "tool for discussion" rather than a set of mandatory, rigid codes.

Development Context Comparison

Reliance on Section 1.0 design metrics for a South Gateway institutional project creates a fundamental regulatory conflict. As noted on page 57 of the Design Guidelines, Section 5.0 explicitly distinguishes the South Gateway from the historic core to accommodate different scales and parking requirements. Many of the aspirational goals in Section 1.0—such as the p. 12 requirement for 'Commercial Storefront Uses'—are more appropriately suited for the Downtown Gardnerville district (Section 2.0). Applying these generic Section 1.0 goals to the South Gateway without regard for context ignores the specific character and intended use of this distinct area.

Development Context Comparison

Feature	Typical Old Town / Main Street Storefronts	South Gateway / Medical Campus Vision
Primary Use Type	Retail Storefronts & Mixed-Use	Professional Medical Office & Commercial (Section 5.0)
Building Setbacks	Aligned at sidewalk edge to create a "street wall"	Campus-style setbacks intended to support a regional "medical hub" (Staff Report p. 2)
Transparency	High degree for storefront retailing and window displays	Professional medical privacy requirements
Parking Orientation	Side or rear (Goal 1.2, p. 13)	Expected larger, visible lots to appeal to regional/pass-through traffic (Section 5.0, p. 8)
Connectivity	Pedestrian-scale "Main Street" experience	Focus on regional medical access and "Gateway" connectivity

ADA Realities and Patient Access Requirements

As healthcare planners, we must emphasize that for a VA Clinic serving mobility-impaired veterans, site design is a matter of clinical safety and federal mandate. The proposed site plan (Figure Six) prioritizes the following "Critical Operational Requirements":

- **Segregated Transit Modes:** The facility must separate high-acuity paratransit and emergency ambulance access from standard patient vehicles to ensure life-safety routes remain unobstructed.
- **ADA Proximity Requirements:** VA clinical standards and the ADA require parking in immediate proximity to the entrance. Forcing veterans with service-connected disabilities to navigate "subordinated" or hidden parking lots significantly increases the risk of patient confusion and falls.
- **Operational Safety:** On-street parking or "hidden" parking lots in a high-turnover medical setting create a "permanent potentially dangerous situation" (Staff Report p. 14). The proposed design ensures a controlled environment for vulnerable patients.

Technical Rebuttal of Access and Circulation Proposals

The Staff Report suggests shared access via Muller Parkway or alternative routes. These are technically and legally unfeasible:

- **Muller Parkway Status:** Per the "Plan for Prosperity," Muller Parkway is a regional bypass designed to divert through-traffic. Direct shared access for a high-volume clinic contradicts its status as a bypass and violates the County/Regional standards intended to maintain through-capacity.
- **Established Legal Access:** Figure Six and Figure Ten clearly identify the "**30' Private Access & Utility Easement**" on Virginia Ranch Road. This is a logical access point for the parcel. It also serves as a shared point of access for the vacant parcels that are situated north of the VA medical facility. There are no code restrictions for the proposed access location onto Larson, a local road.
- **Traffic Level of Service (LOS) and Mitigation:** Table Two of the Staff Report confirms that the "Left turn out of Virginia Ranch Road" onto US 395 operates at LOS D. Under NDOT and Douglas County standards, LOS D is acceptable for local intersections. Furthermore, the applicant is already addressing Finding C by providing a 12.58% pro-rata contribution to a future traffic signal (Staff Report p. 14).

Rebuttal of Recommended Conditions 6, 7, 8, and 10

We request the removal of these conditions based on the "qualitative expectations" framework of the Guidelines:

- **Conditions 6 & 7 (Materials):** Staff admits that the building is "architecturally complex" and "very similar to the CVVC" (Staff Report p. 13). Since the Town previously accepted these materials for the Carson Valley Veterinary Hospital, the same standard of consistency should apply. Staff has also conceded that the "**color of the building is acceptable**" (Staff Report p. 16). The use of "**tan aluminum siding**" and "**thin stone finish**" conveys the "quality and durability" required by page 17 of the Guidelines for modern medical architecture.
- **Condition 8 (Larson Way Driveway):** This condition forces a choice between elective landscaping and life-safety. Per page 11 of the Staff Report, the Town Manager acknowledges that trees in the "**sight distance triangle**" would create a danger. We maintain that the safety of veterans exiting onto Larson Way must supersede the elective placement of street trees.

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- **Condition 10 (Parking Placement):** While Goal 1.0 (p. 11) suggests parking should be subordinate, the South Gateway context (p. 57) explicitly expects visible parking for pass-through regional traffic. Our plan meets the *spirit* of the buffering requirement through the proposed "open space" and "crab apple" screening (Staff Report p. 11), which provides adequate visual softening without compromising veteran access. While we recognize the intent behind the guidelines regarding visible parking, we respectfully interpret their application differently for our project. The Design Guidelines, specifically in the introduction to Section 5, note that Commercial Corridors are characterized by larger parking lots intended to serve the region's pass-through traffic. The VA Clinic serves as a regional medical destination for veterans throughout Carson Valley and neighboring areas. Given the scale and purpose of the facility, and the necessity to provide ADA-compliant parking, it would not be feasible or contextually appropriate to locate all parking behind the building as one might for a smaller boutique in Old Town Gardnerville.

Conformance with Douglas County Code 20.614.040 (The Eight Findings)

The project successfully meets the criteria for MDR approval:

- **Finding C (Hazardous Traffic):** By utilizing the codified 30' Private Access & Utility Easement and contributing 12.58% to signalization, the applicant has mitigated potential impacts. The current design prioritizes "sight distance triangles" over landscaping to *eliminate* hazardous conflicts.
- **Finding G (Standards Compliance):** The project complies with the South Gateway's medical hub vision. The inability to meet specific street tree spacing on Larson Way is a direct consequence of prioritizing mandatory safety "sight triangles," which must take precedence over elective design tools.

Conclusion and Request for Recommendation

The Gardnerville VA Clinic is a critical community asset. The proposed design is architecturally consistent with the adjacent CVVC and provides the functional safety required for veteran healthcare. We respectfully request that the Town Board recommend approval to Douglas County Community Development **without Conditions 6, 7, 8, and 10**, thereby allowing this vital project to move forward as a high-quality addition to the South Gateway.

Respectfully submitted,

WILSON ENGINEERS, LLC



Keith Ruben, AICP
Director of Planning and Entitlements

Cc *Douglas County Community Development*
VA Larson Way Gardnerville, LLC