



Gayle A. Kern, Esq.  
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Reply to: Reno

December 5, 2025

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Eric Young, Senior Planner [eyoung@washoecounty.gov](mailto:eyoung@washoecounty.gov)

Re: *Northstar Ranch Maintenance Association, Inc*  
Sanctuary of God Special Use Permit  
Appeal Number WSUP25-0013  
Hearing Date: 12/16/2025

Dear Commissioners and Mr. Young:

This firm represents Northstar Ranch Homeowners Association ("Association"). I have been retained by the Board of Directors to object to the appeal filed following the denial of the Special Use Permit by the Board of Adjustment.

My client objects to this proposed project for several reasons and various members of the Association are expected to attend the hearing on the appeal. However, the purpose of this letter is to address the prior condition recommended by staff related to the addition of an emergency access/evacuation route. It is my understanding that the engineering department has removed their condition for a secondary access. However, out of an abundance of caution, my client wants to ensure that the Commissioners are aware that to the extent the condition would be reconsidered and such proposed emergency access would cross property owned by the Association, the Association will never agree to such access or emergency easement. After reviewing the recorded documents, no easement exists granting such access over the Association's common area. The deed from the Declarant to Northstar Ranch does not reference any easement benefiting the Church Parcel, nor does the deed for the Church Parcel itself. If the Applicant asserts that there is a separately recorded easement, they will need to provide a copy immediately so that we may review it. However, assuming that there is no recorded easement, then it is important to note that none will be granted by the Association.

Absent a recorded easement, neither the Applicant nor the County can compel the Association to grant a secondary emergency access easement over its property. Doing so would constitute an unlawful taking and violate established property rights under Nevada law.

Thank you for your consideration. Please contact us if you require additional information.

Sincerely,

A handwritten signature in dark ink, appearing to read "Gayle A. Kern", with a long horizontal flourish extending to the right.

Gayle A. Kern, Esq./electronically signed

c. Applicant  
Client