Peter J. Smith IV, ISB #6997 FENNEMORE CRAIG, P.C. 418 E. Lakeside, Suite 224 Coeur d'Alene, Idaho 83814

T: (208) 956-0145

E: peter.smith@fennemorelaw.com

Attorneys for Concerned Citizens Against Additional 100 Boat Slips Added to Templins Resort on Spokane River Inc.

BEFORE THE IDAHO DEPARTMENT OF LANDS

In the Matter of the Application for Encroachment L95S6163A, a Community Dock.

River's Edge Apartments, LLC; Lanzce Douglass,

Applicant.

AGENCY Case No. PH-2025-NAV-22-005 OAH Case No. 25-320-07

DECLARATION

1.	I,	Barbara	J	James	 am	a
citizen of the	e State	of Idaho.				

- I am involved with and/or am a member of CONCERNED CITIZENS AGAINST
 ADDITIONAL 100 BOAT SLIPS ADDED TO TEMPLINS RESORT ON SPOKANE RIVER
 INC., an Idaho nonprofit corporation.
- 3. Pursuant to IDAPA 04.11.01.700 ("Intervention Generally"), I claim a direct and substantial interest in this proceeding concerning the River's Edge Apartments community dock application.
 - 4. My interests are not adequately represented by any existing party to this proceeding.

DECLARATION: 1 OF 6

Property Interest

5.	My property interest in relation to the Spokane River is as follows (check all that
apply):	
□P-5/	I own and reside on riparian (waterfront) property directly fronting the Spokane
River.	
_	I reside near the Spokane River but do not own waterfront property.
	Uses of the Spokane River
6.	I use the Spokane River for the following purposes (check all that apply):
风	Boating
	Fishing
	Kayaking
	Canoeing
	Paddleboarding
	Swimming
	Tubing
	Waterskiing / wakeboarding / wakesurfing
	Wildlife viewing / photography
	Other:

Substantial Interest

		Substantial Interest
	7.	The River's Edge Apartments community dock project will directly and
subst	antially	affect my interests.
	8.	The project will increase boat traffic and congestion on this section of the Spokane
River		
	9.	Increased congestion will reduce safety for all users, including myself and my
family	y.	
	10.	The project will interfere with my ability to use and enjoy the Spokane River.
	11.	The project will increase risks of collision or injury to non-motorized users.
	12.	Noise, wakes, and congestion will diminish the recreational value of this section of
the riv	er.	
	13.	Other impacts specific to me include:
		Adequacy of Representation
	14.	My interests as a property owner and/or river user are not adequately represente
y any e	existing	g party to this proceeding.
,		
,		

Verification

15.	I declare under penalty of perjury pursuant to the laws of the State of Idaho that the
foregoing is to	The and correct. D this
	Barbara James [Signature of Declarant]

DECLARATION: 4 OF 6

CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of August 2025, I cause to be served a true and correct copy of the foregoing document by the method indicated below, and addressed to the following:

Elizabeth A. Tellessen WINSTON & CASHATT, LAWYERS, P.S. 250 Northwest Boulevard, Suite 206 Coeur d'Alene, Idaho 83814 Telephone: (208) 667-2103 Facsimile: (208) 765-2121 Attorneys for River's Edge Apartments, LLC and Lanzce Douglass	☐ By U.S. Mail ☑ By Email eat@winstoncashatt.com
Lanzce Douglass 1402 E. Magnesium Rd. # 202 Spokane, WA 99217 (509) 951-4785 Applicant	☐ By U.S. Mail ■ By Email lanzce@lgdproperties.com
Cindy Richardson R&R Northwest 1857 W. Hayden Avenue, # 102 Hayden, ID 83835 (208) 818-6478 Agent for Applicant	☐ By U.S. Mail ■ By Email cindy.richardson@rrnorthwest.com
Coeur d'Alene Land Company John F. Magnuson 1250 Northwood Center Court, Ste. A Coeur d'Alene, ID 83816 (208) 667-0500 Counsel for Objector CDA Land Co.	☐ By U.S. Mail ☑ By Email john@magnusononline.com
Sheriff Robert B. Norris Kootenai County Sheriffs Office P.O. Box 9000 Coeur d'Alene, ID 83816 (208) 446-1300 Objector	☐ By U.S. Mail ☑ By Email kcso@kcgov.us

DECLARATION: 5 OF 6

Idaho Department of Lands	☐ By U.S. Mail
John Richards, General Counsel	☑ By Email
Kayleen Richter, Counsel	
300 N. 6th Street, Ste. 103	jrichards@idl.idaho.gov
Boise, ID 83702	krichter@idl.idaho.gov
(208) 334-0200	_
Counsel for IDL	
·	
Amidy Fuson	☐ By U.S. Mail
Lands Resource Specialist-Navigable Waters	☑ By Email
	•
Marde Mensinger	afuson@idl.idaho.gov
Program Manager for Navigable Waters	mmensinger@idl.idaho.gov
Kourtney Romine	☐ By U.S. Mail
Rachel King	■ By Email
Kayla Dawson	
Service Contacts for IDL	kromine@idl.idaho.gov
	rking@idl.idaho.gov
	kdawson@idl.idaho.gov
OAH	☐ By U.S. Mail
General Government Division	☑ By Email
P.O. Box 83720	-
Boise, ID 83720-0104	filings@oah.idaho.gov
(208) 605-4300	leslie.hayes@oah.idaho.gov
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Carah Www.de

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Attorneys for Concerned Citizens Against Additional 100 Boat Slips Added to Templins Resort on Spokane River Inc.

BEFORE THE IDAHO DEPARTMENT OF LANDS

In the Matter of the Application for Encroachment L95S6163A, a Community Dock,

River's Edge Apartments, LLC; Lanzce Douglass,

Applicant.

AGENCY Case No. PH-2025-NAV-22-005 OAH Case No. 25-320-07

DECLARATION

- 1. I, Barbara T Moen _____, am a citizen of the State of Idaho.
- 2. I am involved with and/or am a member of CONCERNED CITIZENS AGAINST ADDITIONAL 100 BOAT SLIPS ADDED TO TEMPLINS RESORT ON SPOKANE RIVER INC., an Idaho nonprofit corporation.
- 3. Pursuant to IDAPA 04.11.01.700 ("Intervention Generally"), I claim a direct and substantial interest in this proceeding concerning the River's Edge Apartments community dock application.
 - 4. My interests are not adequately represented by any existing party to this proceeding.

DECLARATION: 1 OF 6

Property Interest

5.	My property interest in relation to the Spokane River is as follows (check all that
apply):	
X	I own and reside on riparian (waterfront) property directly fronting the Spokane
River.	
	I reside near the Spokane River but do not own waterfront property.
	Uses of the Spokane River
6.	I use the Spokane River for the following purposes (check all that apply):
abla	Boating
$\checkmark\!\!\!\!\!/$	Fishing
	Kayaking
abla	Canoeing
\checkmark	Paddleboarding
\A	Swimming
abla	Tubing
abla	Waterskiing / wakeboarding / wakesurfing
${}^{\not}\!$	Wildlife viewing / photography
	Other:

DECLARATION: 2 OF 6

Substantial Interest

	7.	The River's Edge Apartments community dock project will directly and
substa	ntially	affect my interests.
	8.	The project will increase boat traffic and congestion on this section of the Spokane
River.		
	9.	Increased congestion will reduce safety for all users, including myself and my
family	·.	
	10.	The project will interfere with my ability to use and enjoy the Spokane River.
	11.	The project will increase risks of collision or injury to non-motorized users.
	12.	Noise, wakes, and congestion will diminish the recreational value of this section of
the riv	er.	
	13.	Other impacts specific to me include:
	Erc	osion of property's shoreline and existing dock due to increased wakes
		Adequacy of Representation
	14.	My interests as a property owner and/or river user are not adequately represented
by any	existir	ng party to this proceeding.
///		
///		
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///

///

Verification

15	5. I decla	are under penalty of pen	rjury pursua	ant to the laws of the	e State of Idaho that the
foregoing	g is true and	correct.			
D.	ATED this _	19th day of August,	2025, at	Coeur d'Alene	, Idaho.
			Z	Mora J.	Mara
			[Signature	of Declarant]	

CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of August 2025, I cause to be served a true and correct copy of the foregoing document by the method indicated below, and addressed to the following:

Elizabeth A. Tellessen WINSTON & CASHATT, LAWYERS, P.S. 250 Northwest Boulevard, Suite 206 Coeur d'Alene, Idaho 83814 Telephone: (208) 667-2103 Facsimile: (208) 765-2121 Attorneys for River's Edge Apartments, LLC and Lanzce Douglass	☐ By U.S. Mail ☑ By Email eat@winstoncashatt.com
Lanzce Douglass 1402 E. Magnesium Rd. # 202 Spokane, WA 99217 (509) 951-4785 Applicant	☐ By U.S. Mail ■ By Email lanzce@lgdproperties.com
Cindy Richardson R&R Northwest 1857 W. Hayden Avenue, # 102 Hayden, ID 83835 (208) 818-6478 Agent for Applicant	☐ By U.S. Mail ■ By Email cindy.richardson@rrnorthwest.com
Coeur d'Alene Land Company John F. Magnuson 1250 Northwood Center Court, Ste. A Coeur d'Alene, ID 83816 (208) 667-0500 Counsel for Objector CDA Land Co.	☐ By U.S. Mail ☑ By Email john@magnusononline.com
Sheriff Robert B. Norris Kootenai County Sheriffs Office P.O. Box 9000 Coeur d'Alene, ID 83816 (208) 446-1300 Objector	☐ By U.S. Mail ☑ By Email kcso@kcgov.us

DECLARATION: 5 OF 6

Idaho Department of Lands	☐ By U.S. Mail
John Richards, General Counsel	☑ By Email
Kayleen Richter, Counsel	
300 N. 6th Street, Ste. 103	jrichards@idl.idaho.gov
Boise, ID 83702	krichter@idl.idaho.gov
(208) 334-0200	_
Counsel for IDL	
·	
Amidy Fuson	☐ By U.S. Mail
Lands Resource Specialist-Navigable Waters	☑ By Email
	•
Marde Mensinger	afuson@idl.idaho.gov
Program Manager for Navigable Waters	mmensinger@idl.idaho.gov
Kourtney Romine	☐ By U.S. Mail
Rachel King	■ By Email
Kayla Dawson	
Service Contacts for IDL	kromine@idl.idaho.gov
	rking@idl.idaho.gov
	kdawson@idl.idaho.gov
OAH	☐ By U.S. Mail
General Government Division	☑ By Email
P.O. Box 83720	-
Boise, ID 83720-0104	filings@oah.idaho.gov
(208) 605-4300	leslie.hayes@oah.idaho.gov
, , , , , , , , , , , , , , , , , , , ,	

Carah Www.de

53062104.1

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Attorneys for Concerned Citizens Against Additional 100 Boat Slips Added to Templins Resort on Spokane River Inc.

BEFORE THE IDAHO DEPARTMENT OF LANDS

In the Matter of the Application for Encroachment L95S6163A, a Community Dock,	AGENCY Case No. PH-2025-NAV-22-005 OAH Case No. 25-320-07		
River's Edge Apartments, LLC; Lanzce Douglass,	DECLARATION		
Applicant.			
C Thoma 1. I,Hoag	s, am a		
citizen of the State of Idaho.			

ADDITIONAL 100 BOAT SLIPS ADDED TO TEMPLINS RESORT ON SPOKANE RIVER INC., an Idaho nonprofit corporation.

I am involved with and/or am a member of CONCERNED CITIZENS AGAINST

- 3. Pursuant to IDAPA 04.11.01.700 ("Intervention Generally"), I claim a direct and substantial interest in this proceeding concerning the River's Edge Apartments community dock application.
 - 4. My interests are not adequately represented by any existing party to this proceeding.

DECLARATION: 1 OF 6

2.

Property Interest

	5.	My property interest in relation to the Spokane River is as follows (check all that
apply):	:	
	X	I own and reside on riparian (waterfront) property directly fronting the Spokane
River.		
		I reside near the Spokane River but do not own waterfront property.
		Uses of the Spokane River
	6.	I use the Spokane River for the following purposes (check all that apply):
	x	Boating
	X	Fishing
	X	Kayaking
	x	Canoeing
	X	Paddleboarding
	X	Swimming
	x	Tubing
	x	Waterskiing / wakeboarding / wakesurfing
		Wildlife viewing / photography
		Other:
	Sight	seeing
	-	

DECLARATION: 2 OF 6

Substantial Interest

7	. Th	ne I	River's	Edge	Apartments	community	dock	project	will	directly	and
substanti	ally affe	ct m	y intere	ests.							

8. The project will increase boat traffic and congestion on this section of the Spokane River.

- 9. Increased congestion will reduce safety for all users, including myself and my family.
 - 10. The project will interfere with my ability to use and enjoy the Spokane River.
 - 11. The project will increase risks of collision or injury to non-motorized users.
- 12. Noise, wakes, and congestion will diminish the recreational value of this section of the river.

Other impacts specific to me include:

I have	I have lost 75 Sq. Ft. of my river front yard to erosion				

Adequacy of Representation

14.	My interests	as a property	y owner	and/or	river use	er are not	adequately	represented
by any existin	g party to this	proceeding.						

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///
///

13.

///

Verification

	15.	I declare under penalty of perjury	pursuant to the laws of the S	State of Idaho that the
foregoi	ing is tr	rue and correct.		
	DATE	D this 21 day of August, 2025	, at Post Falls	_, Idaho.
		СТ	homas Hoag	
		Sig	gnature of Declarant]	

DECLARATION: 4 OF 6

CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of August 2025, I cause to be served a true and correct copy of the foregoing document by the method indicated below, and addressed to the following:

Elizabeth A. Tellessen WINSTON & CASHATT, LAWYERS, P.S. 250 Northwest Boulevard, Suite 206 Coeur d'Alene, Idaho 83814 Telephone: (208) 667-2103 Facsimile: (208) 765-2121 Attorneys for River's Edge Apartments, LLC and Lanzce Douglass	☐ By U.S. Mail ☑ By Email eat@winstoncashatt.com
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Coeur d'Alene Land Company John F. Magnuson 1250 Northwood Center Court, Ste. A Coeur d'Alene, ID 83816 (208) 667-0500 Counsel for Objector CDA Land Co.	☐ By U.S. Mail ☑ By Email john@magnusononline.com
Sheriff Robert B. Norris Kootenai County Sheriffs Office P.O. Box 9000 Coeur d'Alene, ID 83816 (208) 446-1300 Objector	☐ By U.S. Mail ☑ By Email kcso@kcgov.us

DECLARATION: 5 OF 6

Idaho Department of Lands	☐ By U.S. Mail
John Richards, General Counsel	☑ By Email
Kayleen Richter, Counsel	
300 N. 6th Street, Ste. 103	jrichards@idl.idaho.gov
Boise, ID 83702	krichter@idl.idaho.gov
(208) 334-0200	_
Counsel for IDL	
·	
Amidy Fuson	☐ By U.S. Mail
Lands Resource Specialist-Navigable Waters	☑ By Email
	•
Marde Mensinger	afuson@idl.idaho.gov
Program Manager for Navigable Waters	mmensinger@idl.idaho.gov
Kourtney Romine	☐ By U.S. Mail
Rachel King	■ By Email
Kayla Dawson	
Service Contacts for IDL	kromine@idl.idaho.gov
	rking@idl.idaho.gov
	kdawson@idl.idaho.gov
OAH	☐ By U.S. Mail
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P.O. Box 83720	-
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(208) 605-4300	leslie.hayes@oah.idaho.gov
, , , , , , , , , , , , , , , , , , , ,	

Carah Www.de

53062104.1

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Attorneys for Concerned Citizens Against Additional 100 Boat Slips Added to Templins Resort on Spokane River Inc.

BEFORE THE IDAHO DEPARTMENT OF LANDS

In the Matter of the Application for Encroachment L95S6163A, a Community Dock,

River's Edge Apartments, LLC; Lanzce Douglass,

Applicant.

AGENCY Case No. PH-2025-NAV-22-005 OAH Case No. 25-320-07

DECLARATION

- 1. I, Cheryl Hollenback _____, am a citizen of the State of Idaho.
- 2. I am involved with and/or am a member of CONCERNED CITIZENS AGAINST ADDITIONAL 100 BOAT SLIPS ADDED TO TEMPLINS RESORT ON SPOKANE RIVER INC., an Idaho nonprofit corporation.
- 3. Pursuant to IDAPA 04.11.01.700 ("Intervention Generally"), I claim a direct and substantial interest in this proceeding concerning the River's Edge Apartments community dock application.
 - 4. My interests are not adequately represented by any existing party to this proceeding.

DECLARATION: 1 OF 6

Property Interest

5.	My property interest in relation to the Spokane River is as follows (check all that
apply):	
	I own and reside on riparian (waterfront) property directly fronting the Spokane
River.	
	I reside near the Spokane River but do not own waterfront property.
	Uses of the Spokane River
6.	I use the Spokane River for the following purposes (check all that apply):
	Boating
	Fishing
	Kayaking
	Canoeing
	Paddleboarding
	Swimming
	Tubing
	Waterskiing / wakeboarding / wakesurfing
	Wildlife viewing / photography
	Other:

DECLARATION: 2 OF 6

Substantial Interest

- 7. The River's Edge Apartments community dock project will directly and substantially affect my interests.
- 8. The project will increase boat traffic and congestion on this section of the Spokane River.
- 9. Increased congestion will reduce safety for all users, including myself and my family.
 - 10. The project will interfere with my ability to use and enjoy the Spokane River.
 - 11. The project will increase risks of collision or injury to non-motorized users.
- 12. Noise, wakes, and congestion will diminish the recreational value of this section of the river.
 - 13. Other impacts specific to me include:

Property destruction, erosion of property, damage to
protective boom log system, expense for repair of above.

Adequacy of Representation

	14.	My interests as a property owner and/or river user are not adequately represented
by any	existin	g party to this proceeding.
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///		
///		

DECLARATION: 3 OF 6

///

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Verification

15. I declare under penalty of perjury pursuant to the laws of the State of Idaho that the foregoing is true and correct.

 ${}_{DATED\;this}\;\underline{\textbf{21}}_{day\;of\;August,\;2025,\;at}\;\underline{\textbf{Coeur}\;d\;\textbf{Alene}}_{,\;Idaho.}$

Cheryl Hollenback Digitally signed by Cheryl Hollenback Date: 2025.08.22 08:05:24 -07'00'

[Signature of Declarant]

DECLARATION: 4 OF 6

CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of August 2025, I cause to be served a true and correct copy of the foregoing document by the method indicated below, and addressed to the following:

Elizabeth A. Tellessen WINSTON & CASHATT, LAWYERS, P.S. 250 Northwest Boulevard, Suite 206 Coeur d'Alene, Idaho 83814 Telephone: (208) 667-2103 Facsimile: (208) 765-2121 Attorneys for River's Edge Apartments, LLC and Lanzce Douglass	☐ By U.S. Mail ☑ By Email eat@winstoncashatt.com
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DECLARATION: 5 OF 6

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	•
Marde Mensinger	afuson@idl.idaho.gov
Program Manager for Navigable Waters	mmensinger@idl.idaho.gov
Kourtney Romine	☐ By U.S. Mail
Rachel King	■ By Email
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Carah Www.de

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BEFORE THE IDAHO DEPARTMENT OF LANDS

In the Matter of the Application for Encroachment L95S6163A, a Community Dock,	AGENCY Case No. PH-2025-NAV-22-005 OAH Case No. 25-320-07
River's Edge Apartments, LLC; Lanzce Douglass,	DECLARATION
Applicant.	*
1. I, Craig T citizen of the State of Idaho.	Sheppard, am a

- I am involved with and/or am a member of CONCERNED CITIZENS AGAINST
 ADDITIONAL 100 BOAT SLIPS ADDED TO TEMPLINS RESORT ON SPOKANE RIVER
 INC., an Idaho nonprofit corporation.
- 3. Pursuant to IDAPA 04.11.01.700 ("Intervention Generally"), I claim a direct and substantial interest in this proceeding concerning the River's Edge Apartments community dock application.
 - 4. My interests are not adequately represented by any existing party to this proceeding.

DECLARATION: 1 OF 6

Property Interest

5.	My property interest in relation to the Spokane River is as follows (check all that				
apply):	apply):				
শ্ব	I own and reside on riparian (waterfront) property directly fronting the Spokane				
River.					
	I reside near the Spokane River but do not own waterfront property.				
	Uses of the Spokane River				
6.	I use the Spokane River for the following purposes (check all that apply):				
四	Boating				
Ø	Fishing				
恩	Kayaking				
	Canoeing				
Ø	Paddleboarding				
Æ	Swimming				
粒	Tubing				
	Waterskiing / wakeboarding / wakesurfing				
Ø	Wildlife viewing / photography				
	Other:				
	·				

DECLARATION: 2 OF 6

Substantial Interest

- 7. The River's Edge Apartments community dock project will directly and substantially affect my interests.
- 8. The project will increase boat traffic and congestion on this section of the Spokane River.
- 9. Increased congestion will reduce safety for all users, including myself and my family.
 - 10. The project will interfere with my ability to use and enjoy the Spokane River.
 - 11. The project will increase risks of collision or injury to non-motorized users.
- 12. Noise, wakes, and congestion will diminish the recreational value of this section of the river.
 - 13. Other impacts specific to me include:

Erosin of soil - ch	emicals harmfal
to others and wild life	

Adequacy of Representation

14. My interests as a property owner and/or river user are not adequately represented by any existing party to this proceeding.

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Verification

15.	I declare under penalty of perjury pursuant to the laws of the State of Idaho that the
foregoing is	rue and correct.
DATE	ED this August, 2025, at Post Falls, Idaho.
	[Signature of Declarant]

CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of August 2025, I cause to be served a true and correct copy of the foregoing document by the method indicated below, and addressed to the following:

Elizabeth A. Tellessen WINSTON & CASHATT, LAWYERS, P.S. 250 Northwest Boulevard, Suite 206 Coeur d'Alene, Idaho 83814 Telephone: (208) 667-2103 Facsimile: (208) 765-2121 Attorneys for River's Edge Apartments, LLC and Lanzce Douglass	☐ By U.S. Mail ☑ By Email eat@winstoncashatt.com
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DECLARATION: 5 OF 6

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Kayleen Richter, Counsel	
300 N. 6th Street, Ste. 103	jrichards@idl.idaho.gov
Boise, ID 83702	krichter@idl.idaho.gov
(208) 334-0200	_
Counsel for IDL	
·	
Amidy Fuson	☐ By U.S. Mail
Lands Resource Specialist-Navigable Waters	☑ By Email
	•
Marde Mensinger	afuson@idl.idaho.gov
Program Manager for Navigable Waters	mmensinger@idl.idaho.gov
Kourtney Romine	☐ By U.S. Mail
Rachel King	■ By Email
Kayla Dawson	
Service Contacts for IDL	kromine@idl.idaho.gov
	rking@idl.idaho.gov
	kdawson@idl.idaho.gov
OAH	☐ By U.S. Mail
General Government Division	☑ By Email
P.O. Box 83720	-
Boise, ID 83720-0104	filings@oah.idaho.gov
(208) 605-4300	leslie.hayes@oah.idaho.gov
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Peter J. Smith IV, ISB #6997 FENNEMORE CRAIG, P.C. 418 E. Lakeside, Suite 224 Coeur d'Alene, Idaho 83814

T: (208) 956-0145

E: peter.smith@fennemorelaw.com

Attorneys for Concerned Citizens Against Additional 100 Boat Slips Added to Templins Resort on Spokane River Inc.

BEFORE THE IDAHO DEPARTMENT OF LANDS

In the Matter of the Application for Encroachment L95S6163A, a Community Dock,

River's Edge Apartments, LLC; Lanzce Douglass,

Applicant.

AGENCY Case No. PH-2025-NAV-22-005
OAH Case No. 25-320-07

DECLARATION

	1.	I, _	Dale F James	 n	a
citizer	n of th	e State o	f Idaho		

- I am involved with and/or am a member of CONCERNED CITIZENS AGAINST
 ADDITIONAL 100 BOAT SLIPS ADDED TO TEMPLINS RESORT ON SPOKANE RIVER
 INC., an Idaho nonprofit corporation.
- 3. Pursuant to IDAPA 04.11.01.700 ("Intervention Generally"), I claim a direct and substantial interest in this proceeding concerning the River's Edge Apartments community dock application.
 - 4. My interests are not adequately represented by any existing party to this proceeding.

DECLARATION: 1 OF 6

Property Interest

5.	My property interest in relation to the Spokane River is as follows (check all that		
apply):			
A	I own and reside on riparian (waterfront) property directly fronting the Spokane		
River.			
	I reside near the Spokane River but do not own waterfront property.		
	Uses of the Spokane River		
6.	I use the Spokane River for the following purposes (check all that apply):		
B	Boating		
	Fishing		
	Kayaking		
	Canoeing		
	Paddleboarding		
	Swimming		
	Tubing		
	Waterskiing / wakeboarding / wakesurfing		
	Wildlife viewing / photography		
	Other:		

Substantial Interest

		Substantial Interest
	7.	The River's Edge Apartments community dock project will directly and
substa	antially	affect my interests.
	8.	The project will increase boat traffic and congestion on this section of the Spokane
River		
	9.	Increased congestion will reduce safety for all users, including myself and my
family	7.	
	10.	The project will interfere with my ability to use and enjoy the Spokane River.
	11.	The project will increase risks of collision or injury to non-motorized users.
	12.	Noise, wakes, and congestion will diminish the recreational value of this section of
the riv	er.	
	13.	Other impacts specific to me include:
		Adequacy of Representation
	14.	My interests as a property owner and/or river user are not adequately represented
by any	existin	ng party to this proceeding.
///		
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///		
///		

Verification

1:	5. I de	I declare under penalty of perjury pursuant to the laws of the State of Idaho that the		
		nd correct.		
D	ATED thi	is 22 day of August, 2025, at Post Falls	, Idaho.	

[Signature of Declarant]

CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of August 2025, I cause to be served a true and correct copy of the foregoing document by the method indicated below, and addressed to the following:

Elizabeth A. Tellessen WINSTON & CASHATT, LAWYERS, P.S. 250 Northwest Boulevard, Suite 206 Coeur d'Alene, Idaho 83814 Telephone: (208) 667-2103 Facsimile: (208) 765-2121 Attorneys for River's Edge Apartments, LLC and Lanzce Douglass	☐ By U.S. Mail ☑ By Email eat@winstoncashatt.com
Lanzce Douglass 1402 E. Magnesium Rd. # 202 Spokane, WA 99217 (509) 951-4785 Applicant	☐ By U.S. Mail ■ By Email lanzce@lgdproperties.com
Cindy Richardson R&R Northwest 1857 W. Hayden Avenue, # 102 Hayden, ID 83835 (208) 818-6478 Agent for Applicant	☐ By U.S. Mail ■ By Email cindy.richardson@rrnorthwest.com
Coeur d'Alene Land Company John F. Magnuson 1250 Northwood Center Court, Ste. A Coeur d'Alene, ID 83816 (208) 667-0500 Counsel for Objector CDA Land Co.	☐ By U.S. Mail ☑ By Email john@magnusononline.com
Sheriff Robert B. Norris Kootenai County Sheriffs Office P.O. Box 9000 Coeur d'Alene, ID 83816 (208) 446-1300 Objector	☐ By U.S. Mail ☑ By Email kcso@kcgov.us

DECLARATION: 5 OF 6

Idaho Department of Lands	☐ By U.S. Mail
John Richards, General Counsel	☑ By Email
Kayleen Richter, Counsel	
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Boise, ID 83702	krichter@idl.idaho.gov
(208) 334-0200	_
Counsel for IDL	
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Amidy Fuson	☐ By U.S. Mail
Lands Resource Specialist-Navigable Waters	☑ By Email
	•
Marde Mensinger	afuson@idl.idaho.gov
Program Manager for Navigable Waters	mmensinger@idl.idaho.gov
Kourtney Romine	☐ By U.S. Mail
Rachel King	■ By Email
Kayla Dawson	
Service Contacts for IDL	kromine@idl.idaho.gov
	rking@idl.idaho.gov
	kdawson@idl.idaho.gov
OAH	☐ By U.S. Mail
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P.O. Box 83720	-
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Carah Www.de

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(208) 956-0145

E:

peter.smith@fennemorelaw.com

Attorneys for Concerned Citizens Against Additional 100 Boat Slips Added to Templins Resort on Spokane River Inc.

BEFORE THE IDAHO DEPARTMENT OF LANDS

In the Matter of the Application for Encroachment L95S6163A, a Community Dock,

River's Edge Apartments, LLC; Lanzce Douglass,

Applicant.

AGENCY Case No. PH-2025-NAV-22-005

OAH Case No. 25-320-07

DECLARATION

- 1. I, Daniel F. Loughlin, am a citizen of the State of Idaho.
- I am involved with and/or am a member of CONCERNED CITIZENS AGAINST
 ADDITIONAL 100 BOAT SLIPS ADDED TO TEMPLINS RESORT ON SPOKANE RIVER
 INC., an Idaho nonprofit corporation.
- 3. Pursuant to IDAPA 04.11.01.700 ("Intervention Generally"), I claim a direct and substantial interest in this proceeding concerning the River's Edge Apartments community dock application.
 - 4. My interests are not adequately represented by any existing party to this proceeding.

Property Interest

DECLARATION: 1 OF 6

	5.	My property interest in relation to the Spokane River is as follows (check all that
apply):	:	
		I own and reside on riparian (waterfront) property directly fronting the Spokane
River.		
		I reside near the Spokane River but do not own waterfront property.
		Uses of the Spokane River
	6.	I use the Spokane River for the following purposes (check all that apply):
		Boating
		Fishing
		Kayaking
		Canoeing
		Paddleboarding
		Swimming
		Tubing
		Waterskiing / wakeboarding / wakesurfing
	P	Wildlife viewing / photography
		Other:

Substantial Interest

DECLARATION: 2 OF 6

	7.	The River's Edge Apartments community dock project will directly and
substa	ntially	affect my interests.
	8.	The project will increase boat traffic and congestion on this section of the Spokane
River.		
	9.	Increased congestion will reduce safety for all users, including myself and my
family	·.	
	10.	The project will interfere with my ability to use and enjoy the Spokane River.
	11.	The project will increase risks of collision or injury to non-motorized users.
	12.	Noise, wakes, and congestion will diminish the recreational value of this section of
the riv	er.	
	13.	Other impacts specific to me include:
		Adequacy of Representation
	14.	My interests as a property owner and/or river user are not adequately represented
by any	existi	ng party to this proceeding.
///		
///		
///		
///		
///		

Verification

DECLARATION: 3 OF 6

15.	I declare under penalty of perjury pursuant to the laws of the State of Idaho that the
foregoing is to	rue and correct.

DATED this 21 day of August, 2025, at Post FALS, Idaho.

[Signature of Declarant]

CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of August 2025, I cause to be served a true and correct copy of the foregoing document by the method indicated below, and addressed to the following:

Elizabeth A. Tellessen WINSTON & CASHATT, LAWYERS, P.S. 250 Northwest Boulevard, Suite 206 Coeur d'Alene, Idaho 83814 Telephone: (208) 667-2103 Facsimile: (208) 765-2121 Attorneys for River's Edge Apartments, LLC and Lanzce Douglass	☐ By U.S. Mail ☑ By Email eat@winstoncashatt.com
Lanzce Douglass 1402 E. Magnesium Rd. # 202 Spokane, WA 99217 (509) 951-4785 Applicant	☐ By U.S. Mail ■ By Email lanzce@lgdproperties.com
Cindy Richardson R&R Northwest 1857 W. Hayden Avenue, # 102 Hayden, ID 83835 (208) 818-6478 Agent for Applicant	☐ By U.S. Mail ■ By Email cindy.richardson@rrnorthwest.com
Coeur d'Alene Land Company John F. Magnuson 1250 Northwood Center Court, Ste. A Coeur d'Alene, ID 83816 (208) 667-0500 Counsel for Objector CDA Land Co.	☐ By U.S. Mail ☑ By Email john@magnusononline.com
Sheriff Robert B. Norris Kootenai County Sheriffs Office P.O. Box 9000 Coeur d'Alene, ID 83816 (208) 446-1300 Objector	☐ By U.S. Mail ☑ By Email kcso@kcgov.us

DECLARATION: 5 OF 6

Idaho Department of Lands	☐ By U.S. Mail
John Richards, General Counsel	☑ By Email
Kayleen Richter, Counsel	
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(208) 334-0200	_
Counsel for IDL	
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Amidy Fuson	☐ By U.S. Mail
Lands Resource Specialist-Navigable Waters	☑ By Email
	•
Marde Mensinger	afuson@idl.idaho.gov
Program Manager for Navigable Waters	mmensinger@idl.idaho.gov
Kourtney Romine	☐ By U.S. Mail
Rachel King	■ By Email
Kayla Dawson	
Service Contacts for IDL	kromine@idl.idaho.gov
	rking@idl.idaho.gov
	kdawson@idl.idaho.gov
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Carah Www.de

53062104.1

Peter J. Smith IV, ISB #6997 FENNEMORE CRAIG, P.C. 418 E. Lakeside, Suite 224 Coeur d'Alene, Idaho 83814

T: (208) 956-0145

E: peter.smith@fennemorelaw.com

Attorneys for Concerned Citizens Against Additional 100 Boat Slips Added to Templins Resort on Spokane River Inc.

BEFORE THE IDAHO DEPARTMENT OF LANDS

In the Matter of the Application for Encroachment L95S6163A, a Community Dock,

River's Edge Apartments, LLC; Lanzce Douglass,

Applicant.

AGENCY Case No. PH-2025-NAV-22-005

OAH Case No. 25-320-07

DECLARATION

- I am involved with and/or am a member of CONCERNED CITIZENS AGAINST ADDITIONAL 100 BOAT SLIPS ADDED TO TEMPLINS RESORT ON SPOKANE RIVER INC., an Idaho nonprofit corporation.
- Pursuant to IDAPA 04.11.01.700 ("Intervention Generally"), I claim a direct and substantial interest in this proceeding concerning the River's Edge Apartments community dock application.
 - My interests are not adequately represented by any existing party to this proceeding.

DECLARATION: 1 OF 6

Property Interest

5.	My property interest in relation to the Spokane River is as follows (check all that
apply):	
	I own and reside on riparian (waterfront) property directly fronting the Spokane
River.	
Į X C	I reside near the Spokane River but do not own waterfront property.
	Uses of the Spokane River
6.	I use the Spokane River for the following purposes (check all that apply):
A	P Boating
	Fishing
(B)	Kayaking
(A)	Canoeing
) BD	Paddleboarding
	Swimming
	Tubing
	Waterskiing / wakeboarding / wakesurfing
B	Wildlife viewing / photography
	Other:
-	

DECLARATION: 2 OF 6

Substantial Interest

	7.	The River's Edge Apartments community dock project will directly and
substa	ntially	affect my interests.
	8.	The project will increase boat traffic and congestion on this section of the Spokane
River.		
	9.	Increased congestion will reduce safety for all users, including myself and my
family		
	10.	The project will interfere with my ability to use and enjoy the Spokane River.
	11.	The project will increase risks of collision or injury to non-motorized users.
	12.	Noise, wakes, and congestion will diminish the recreational value of this section of
the riv	er.	
	13.	Other impacts specific to me include:
	_	
		Adequacy of Representation
	14.	My interests as a property owner and/or river user are not adequately represented
by any	existi	ng party to this proceeding.
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///		
111		

Verification

15. I declare under penalty of perjury pursuant to the laws of the State of Idaho that the foregoing is true and correct.

DATED this 21 day of August, 2025, at POST FALLS, Idaho.

[Signature of Declarant]

DECLARATION: 4 OF 6

CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of August 2025, I cause to be served a true and correct copy of the foregoing document by the method indicated below, and addressed to the following:

Elizabeth A. Tellessen WINSTON & CASHATT, LAWYERS, P.S. 250 Northwest Boulevard, Suite 206 Coeur d'Alene, Idaho 83814 Telephone: (208) 667-2103 Facsimile: (208) 765-2121 Attorneys for River's Edge Apartments, LLC and Lanzce Douglass	☐ By U.S. Mail ☑ By Email eat@winstoncashatt.com
Lanzce Douglass 1402 E. Magnesium Rd. # 202 Spokane, WA 99217 (509) 951-4785 Applicant	☐ By U.S. Mail ■ By Email lanzce@lgdproperties.com
Cindy Richardson R&R Northwest 1857 W. Hayden Avenue, # 102 Hayden, ID 83835 (208) 818-6478 Agent for Applicant	☐ By U.S. Mail ■ By Email cindy.richardson@rrnorthwest.com
Coeur d'Alene Land Company John F. Magnuson 1250 Northwood Center Court, Ste. A Coeur d'Alene, ID 83816 (208) 667-0500 Counsel for Objector CDA Land Co.	☐ By U.S. Mail ☑ By Email john@magnusononline.com
Sheriff Robert B. Norris Kootenai County Sheriffs Office P.O. Box 9000 Coeur d'Alene, ID 83816 (208) 446-1300 Objector	☐ By U.S. Mail ☑ By Email kcso@kcgov.us

DECLARATION: 5 OF 6

Idaho Department of Lands	☐ By U.S. Mail
John Richards, General Counsel	☑ By Email
Kayleen Richter, Counsel	
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Carah Www.de

53062104.1

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E: peter.smith@fennemorelaw.com

Attorneys for Concerned Citizens Against Additional 100 Boat Slips Added to Templins Resort on Spokane River Inc.

BEFORE THE IDAHO DEPARTMENT OF LANDS

In the Matter of the Application for Encroachment L95S6163A, a Community Dock,

River's Edge Apartments, LLC; Lanzce Douglass,

Applicant.

AGENCY Case No. PH-2025-NAV-22-005 OAH Case No. 25-320-07

DECLARATION

1.	1, Clinton	Allert	,	am	a
citizen of t	he State of Idaho.				

- I am involved with and/or am a member of CONCERNED CITIZENS AGAINST ADDITIONAL 100 BOAT SLIPS ADDED TO TEMPLINS RESORT ON SPOKANE RIVER INC., an Idaho nonprofit corporation.
- Pursuant to IDAPA 04.11.01.700 ("Intervention Generally"), I claim a direct and substantial interest in this proceeding concerning the River's Edge Apartments community dock application.
 - My interests are not adequately represented by any existing party to this proceeding.

DECLARATION: 1 OF 6

Property Interest

	5.	My property interest in relation to the Spokane River is as follows (check all that
apply)		
		I own and reside on riparian (waterfront) property directly fronting the Spokane
River.		
,		I reside near the Spokane River but do not own waterfront property.
		Uses of the Spokane River
	6.	I use the Spokane River for the following purposes (check all that apply):
	×	Boating
	×	Fishing
		Kayaking
		Canoeing
		Paddleboarding
	X	Swimming
		Tubing
		Waterskiing / wakeboarding / wakesurfing
		Wildlife viewing / photography
		Other:
	-	

DECLARATION: 2 OF 6

Substantial Interest

- 7. The River's Edge Apartments community dock project will directly and substantially affect my interests.
- The project will increase boat traffic and congestion on this section of the Spokane
 River.
- Increased congestion will reduce safety for all users, including myself and my family.
 - The project will interfere with my ability to use and enjoy the Spokane River.
 - 11. The project will increase risks of collision or injury to non-motorized users.
- Noise, wakes, and congestion will diminish the recreational value of this section of the river.
 - 13. Other impacts specific to me include:

the Piven stressy has to many bonts to be safe for swimmig and Paddle boarding.

Adequacy of Representation

14. My interests as a property owner and/or river user are not adequately represented by any existing party to this proceeding.

III sherett don't Protest 11% hoshiold.

III unfafe Lon Rids to Swim.

///

Verification

	15.	I declare under penalty of perjury pursuant to the laws of the State of Idano that the
forego	ing is tr	rue and correct.
	DATE	D this 2 (day of August, 2025, at dd -, Idaho.
		Signature of Declarant

DECLARATION: 4 OF 6

CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of August 2025, I cause to be served a true and correct copy of the foregoing document by the method indicated below, and addressed to the following:

Elizabeth A. Tellessen WINSTON & CASHATT, LAWYERS, P.S. 250 Northwest Boulevard, Suite 206 Coeur d'Alene, Idaho 83814 Telephone: (208) 667-2103 Facsimile: (208) 765-2121 Attorneys for River's Edge Apartments, LLC and Lanzce Douglass	☐ By U.S. Mail ☑ By Email eat@winstoncashatt.com
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Cindy Richardson R&R Northwest 1857 W. Hayden Avenue, # 102 Hayden, ID 83835 (208) 818-6478 Agent for Applicant	☐ By U.S. Mail ■ By Email cindy.richardson@rrnorthwest.com
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DECLARATION: 5 OF 6

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	•
Marde Mensinger	afuson@idl.idaho.gov
Program Manager for Navigable Waters	mmensinger@idl.idaho.gov
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Service Contacts for IDL	kromine@idl.idaho.gov
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P.O. Box 83720	-
Boise, ID 83720-0104	filings@oah.idaho.gov
(208) 605-4300	leslie.hayes@oah.idaho.gov
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Carah Www.de

53062104.1

Peter J. Smith IV, ISB #6997 FENNEMORE CRAIG, P.C. 418 E. Lakeside, Suite 224 Coeur d'Alene, Idaho 83814					
T: (208) 956-0145					
E: peter smith or femion pretay com					
Attorneys for Concerned Citizens Against Additional 100 Boat Slips Added to Templins Resort on Spokane River Inc.					
BEFORE THE IDAHO DE In the Matter of the Application for Encroachment L95S6163A, a Community Dock, River's Edge Apartments, LLC;	AGENCY Case No. PH-2025-NAV-22-005 OAH Case No. 25-320-07				
Lanzce Douglass,	DECLARATION				
Applicant.					
1. I, Darci Allert State of Idaho. 2. I am involved with and/or am a membad ADDITIONAL 100 BOAT SLIPS ADDED TO INC., an Idaho nonprofit corporation. 3. Pursuant to IDAPA 04.11.01.700 ("Interventi interest in this proceeding concerning the River's 4. My interests are not adequately represented by	TEMPLINS RESORT ON SPOKANE RIVER on Generally"), I claim a direct and substantial Edge Apartments community dock application.				
	Interest				
5. My property interest in relation to the Spokane I own and reside on riparian (w	raterfront) property directly fronting the Spokane				
River. I reside near the Spokane River but do not own waterfront property. Uses of the Spokane River					
6. I use the Spokane River for the following purp					
Boating Fishing Kayaking Canoeing Paddleboarding Swimming Tubing Waterskiing / wakeboarding / w Wildlife viewing / photography Other:	-				

Substantial Interest 7. The River's Edge Apartments community dock project will directly and substantially affect my interests. 8. The project will increase boat traffic and congestion on this section of the Spokane River. 9. Increased congestion will reduce safety for all users, including myself and my family. 10. The project will interfere with my ability to use and enjoy the Spokane River. 11. The project will increase risks of collision or injury to non-motorized users. 12. Noise, wakes, and congestion will diminish the recreational value of this section of the river. 13. Other impacts specific to me include: Adequacy of Representation 14. My interests as a property owner and/or river user are not adequately represented by any existing party to this proceeding. /// /// /// /// /// Verification 15. I declare under penalty of perjury pursuant to the laws of the State of Idaho that the foregoing DATED this 21 day of August, 2025, at Rost Fales, Idaho. is true and correct. [Signature of Declarant] CERTIFICATE OF SERVICE I hereby certify that on the day of ______, 2025, I cause to be served a true and correct copy of the foregoing document by the method indicated below, and addressed to the following: Elizabeth A. Tellessen " By U.S. Mail WINSTON & CASHATT, LAWYERS, P.S. y By Email 250 Northwest Boulevard, Suite 206 Coeur d'Alene, Idaho 83814 Telephone: (208) 667-2103

Facsimile: (208) 765-2121

CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of August 2025, I cause to be served a true and correct copy of the foregoing document by the method indicated below, and addressed to the following:

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Cindy Richardson R&R Northwest 1857 W. Hayden Avenue, # 102 Hayden, ID 83835 (208) 818-6478 Agent for Applicant	☐ By U.S. Mail ■ By Email cindy.richardson@rrnorthwest.com
Coeur d'Alene Land Company John F. Magnuson 1250 Northwood Center Court, Ste. A Coeur d'Alene, ID 83816 (208) 667-0500 Counsel for Objector CDA Land Co.	☐ By U.S. Mail ☑ By Email john@magnusononline.com
Sheriff Robert B. Norris Kootenai County Sheriffs Office P.O. Box 9000 Coeur d'Alene, ID 83816 (208) 446-1300 Objector	☐ By U.S. Mail ☑ By Email kcso@kcgov.us

DECLARATION: 5 OF 6

Idaho Department of Lands	☐ By U.S. Mail
John Richards, General Counsel	☑ By Email
Kayleen Richter, Counsel	
300 N. 6th Street, Ste. 103	jrichards@idl.idaho.gov
Boise, ID 83702	krichter@idl.idaho.gov
(208) 334-0200	_
Counsel for IDL	
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Amidy Fuson	☐ By U.S. Mail
Lands Resource Specialist-Navigable Waters	☑ By Email
	•
Marde Mensinger	afuson@idl.idaho.gov
Program Manager for Navigable Waters	mmensinger@idl.idaho.gov
Kourtney Romine	☐ By U.S. Mail
Rachel King	■ By Email
Kayla Dawson	
Service Contacts for IDL	kromine@idl.idaho.gov
	rking@idl.idaho.gov
	kdawson@idl.idaho.gov
OAH	☐ By U.S. Mail
General Government Division	☑ By Email
P.O. Box 83720	-
Boise, ID 83720-0104	filings@oah.idaho.gov
(208) 605-4300	leslie.hayes@oah.idaho.gov
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53062104.1

Peter J. Smith IV, ISB #6997 FENNEMORE CRAIG, P.C. 418 E. Lakeside, Suite 224 Coeur d'Alene, Idaho 83814

T: (208) 956-0145

E: peter.smith@fennemorelaw.com

Attorneys for Concerned Citizens Against Additional 100 Boat Slips Added to Templins Resort on Spokane River Inc.

BEFORE THE IDAHO DEPARTMENT OF LANDS

In the Matter of the Application for Encroachment L95S6163A, a Community Dock,

River's Edge Apartments, LLC; Lanzce Douglass,

Applicant.

AGENCY Case No. PH-2025-NAV-22-005 OAH Case No. 25-320-07

DECLARATION

1.	I,	Marc	Allert	 am	a
citizen of the	State	e of Idaho.			

- I am involved with and/or am a member of CONCERNED CITIZENS AGAINST ADDITIONAL 100 BOAT SLIPS ADDED TO TEMPLINS RESORT ON SPOKANE RIVER INC., an Idaho nonprofit corporation.
- Pursuant to IDAPA 04.11.01.700 ("Intervention Generally"), I claim a direct and substantial interest in this proceeding concerning the River's Edge Apartments community dock application.
 - 4. My interests are not adequately represented by any existing party to this proceeding.

DECLARATION: 1 OF 6

Property Interest

5.	My property interest in relation to the Spokane River is as follows (check all that
apply):	
×	I own and reside on riparian (waterfront) property directly fronting the Spokane
River.	
	I reside near the Spokane River but do not own waterfront property.
	Uses of the Spokane River
6.	I use the Spokane River for the following purposes (check all that apply):
×	Boating
×	Fishing
X	Kayaking
	Canoeing
	Paddleboarding
×	Swimming
×	Tubing
	Waterskiing / wakeboarding / wakesurfing
	Wildlife viewing / photography
	Other:
_	

DECLARATION: 2 OF 6

Substantial Interest

- 7. The River's Edge Apartments community dock project will directly and substantially affect my interests.
- The project will increase boat traffic and congestion on this section of the Spokane
 River.
- Increased congestion will reduce safety for all users, including myself and my family.
 - 10. The project will interfere with my ability to use and enjoy the Spokane River.
 - 11. The project will increase risks of collision or injury to non-motorized users.
- 12. Noise, wakes, and congestion will diminish the recreational value of this section of the river.
 - 13. Other impacts specific to me include:

7	n of strong	

Adequacy of Representation

14.	My interests	as a property	owner	and/or	river	user	are no	ot adequate	ly re	presented
by any existin	g party to this	proceeding.								

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Verification

	15.	I declare under penalty of perjury pursuant to the laws of the State of Idaho that the
foregoi	ing is t	rue and correct.
	DATE	D this 21 day of August, 2025, at Post Falls, Idaho.
		[Signature of Declarant]

DECLARATION: 4 OF 6

CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of August 2025, I cause to be served a true and correct copy of the foregoing document by the method indicated below, and addressed to the following:

Elizabeth A. Tellessen WINSTON & CASHATT, LAWYERS, P.S. 250 Northwest Boulevard, Suite 206 Coeur d'Alene, Idaho 83814 Telephone: (208) 667-2103 Facsimile: (208) 765-2121 Attorneys for River's Edge Apartments, LLC and Lanzce Douglass	☐ By U.S. Mail ☑ By Email eat@winstoncashatt.com
Lanzce Douglass 1402 E. Magnesium Rd. # 202 Spokane, WA 99217 (509) 951-4785 Applicant	☐ By U.S. Mail ■ By Email lanzce@lgdproperties.com
Cindy Richardson R&R Northwest 1857 W. Hayden Avenue, # 102 Hayden, ID 83835 (208) 818-6478 Agent for Applicant	☐ By U.S. Mail ■ By Email cindy.richardson@rrnorthwest.com
Coeur d'Alene Land Company John F. Magnuson 1250 Northwood Center Court, Ste. A Coeur d'Alene, ID 83816 (208) 667-0500 Counsel for Objector CDA Land Co.	☐ By U.S. Mail ☑ By Email john@magnusononline.com
Sheriff Robert B. Norris Kootenai County Sheriffs Office P.O. Box 9000 Coeur d'Alene, ID 83816 (208) 446-1300 Objector	☐ By U.S. Mail ☑ By Email kcso@kcgov.us

DECLARATION: 5 OF 6

Idaho Department of Lands	☐ By U.S. Mail
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Kayleen Richter, Counsel	
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Boise, ID 83702	krichter@idl.idaho.gov
(208) 334-0200	_
Counsel for IDL	
·	
Amidy Fuson	☐ By U.S. Mail
Lands Resource Specialist-Navigable Waters	☑ By Email
	•
Marde Mensinger	afuson@idl.idaho.gov
Program Manager for Navigable Waters	mmensinger@idl.idaho.gov
Kourtney Romine	☐ By U.S. Mail
Rachel King	■ By Email
Kayla Dawson	
Service Contacts for IDL	kromine@idl.idaho.gov
	rking@idl.idaho.gov
	kdawson@idl.idaho.gov
OAH	☐ By U.S. Mail
General Government Division	☑ By Email
P.O. Box 83720	-
Boise, ID 83720-0104	filings@oah.idaho.gov
(208) 605-4300	leslie.hayes@oah.idaho.gov
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Carah Www.de

53062104.1

FENNEMORE CRAIG, P.C. 418 E. Lakeside, Suite 224 Coeur d'Alene, Idaho 83814 T: (208) 956-0145 E: peter smithto fennemore law.com Attorneys for Concerned Citizens Against Additional 100 Boat Slips Added to Templins Resort on Spokane River Inc. BEFORE THE IDAHO DEPARTMENT OF LANDS In the Matter of the Application for AGENCY Case No. PH-2025-NAV-22-005 Encroachment L95S6163A, a Community OAH Case No. 25-320-07 Dock, River's Edge Apartments, LLC; DECLARATION Lanzce Douglass, Applicant. am a citizen of the 1. I. State of Idaho. I am involved with and/or am a member of CONCERNED CITIZENS AGAINST ADDITIONAL 100 BOAT SLIPS ADDED TO TEMPLINS RESORT ON SPOKANE RIVER INC., an Idaho nonprofit corporation. 3. Pursuant to IDAPA 04.11.01.700 ("Intervention Generally"), I claim a direct and substantial interest in this proceeding concerning the River's Edge Apartments community dock application. 4. My interests are not adequately represented by any existing party to this proceeding. Property Interest 5. My property interest in relation to the Spokane River is as follows (check all that apply): I own and reside on riparian (waterfront) property directly fronting the Spokane River. I reside near the Spokane River but do not own waterfront property. \mathbf{Z} Uses of the Spokane River 6. I use the Spokane River for the following purposes (check all that apply): Boating Z Z Fishing Kayaking Canoeing Paddleboarding Swimming X Waterskiing / wakeboarding / wakesurfing Wildlife viewing / photography

Peter J. Smith IV, ISB #6997

Other:

П

Substantial Interest 7. The River's Edge Apartments community dock project will directly and substantially affect my interests. 8. The project will increase boat traffic and congestion on this section of the Spokane River. 9. Increased congestion will reduce safety for all users, including myself and my family. 10. The project will interfere with my ability to use and enjoy the Spokane River. 11. The project will increase risks of collision or injury to non-motorized users. 12. Noise, wakes, and congestion will diminish the recreational value of this section of the river. 13. Other impacts specific to me include: Adequacy of Representation 14. My interests as a property owner and/or river user are not adequately represented by any existing party to this proceeding. III/// /// /// /// Verification 15. I declare under penalty of perjury pursuant to the laws of the State of Idaho that the foregoing is true and correct. DATED this 2 day of August, 2025, at Courd alene gnature of Declarant CERTIFICATE OF SERVICE ne

I hereby certify that on the and correct copy of the foregoing do following:		, 2025, I cause to be served a true method indicated below, and addressed to the
Elizabeth A. Tellessen	" By U	.S. Mail

WINSTON & CASHATT, LAWYERS, P.S. y By Email

250 Northwest Boulevard, Suite 206

Coeur d'Alene, Idaho 83814

Telephone: (208) 667-2103 Facsimile: (208) 765-2121

CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of August 2025, I cause to be served a true and correct copy of the foregoing document by the method indicated below, and addressed to the following:

Elizabeth A. Tellessen WINSTON & CASHATT, LAWYERS, P.S. 250 Northwest Boulevard, Suite 206 Coeur d'Alene, Idaho 83814 Telephone: (208) 667-2103 Facsimile: (208) 765-2121 Attorneys for River's Edge Apartments, LLC and Lanzce Douglass	☐ By U.S. Mail ☑ By Email eat@winstoncashatt.com
Lanzce Douglass 1402 E. Magnesium Rd. # 202 Spokane, WA 99217 (509) 951-4785 Applicant	☐ By U.S. Mail ■ By Email lanzce@lgdproperties.com
Cindy Richardson R&R Northwest 1857 W. Hayden Avenue, # 102 Hayden, ID 83835 (208) 818-6478 Agent for Applicant	☐ By U.S. Mail ☑ By Email cindy.richardson@rrnorthwest.com
Coeur d'Alene Land Company John F. Magnuson 1250 Northwood Center Court, Ste. A Coeur d'Alene, ID 83816 (208) 667-0500 Counsel for Objector CDA Land Co.	☐ By U.S. Mail ■ By Email john@magnusononline.com
Sheriff Robert B. Norris Kootenai County Sheriffs Office P.O. Box 9000 Coeur d'Alene, ID 83816 (208) 446-1300 Objector	☐ By U.S. Mail ■ By Email kcso@kcgov.us

DECLARATION: 5 OF 6

☐ By U.S. Mail
▼ By Email
jrichards@idl.idaho.gov
krichter@idl.idaho.gov
_
☐ By U.S. Mail
▼ By Email
afuson@idl.idaho.gov
mmensinger@idl.idaho.gov
☐ By U.S. Mail
▼ By Email
kromine@idl.idaho.gov
rking@idl.idaho.gov
kdawson@idl.idaho.gov
☐ By U.S. Mail
■ By Email
filings@oah.idaho.gov
leslie.hayes@oah.idaho.gov

Carah Www.de

53062104.1

Peter J. Smith IV, ISB #6997 FENNEMORE CRAIG, P.C. 418 E. Lakeside, Suite 224 Coeur d'Alene, Idaho 83814

T: (208) 956-0145

E: peter.smith@fennemorelaw.com

Attorneys for Concerned Citizens Against Additional 100 Boat Slips Added to Templins Resort on Spokane River Inc.

BEFORE THE IDAHO DEPARTMENT OF LANDS

In the Matter of the Application for Encroachment L95S6163A, a Community Dock,

River's Edge Apartments, LLC; Lanzce Douglass,

Applicant.

AGENCY Case No. PH-2025-NAV-22-005

OAH Case No. 25-320-07

DECLARATION

	1	1, Diana J	Sullivan		
	1.	1, Maria	Julivare	 am	a
citizen	of the	e State of Idaho			

- I am involved with and/or am a member of CONCERNED CITIZENS AGAINST ADDITIONAL 100 BOAT SLIPS ADDED TO TEMPLINS RESORT ON SPOKANE RIVER INC., an Idaho nonprofit corporation.
- Pursuant to IDAPA 04.11.01.700 ("Intervention Generally"), I claim a direct and substantial interest in this proceeding concerning the River's Edge Apartments community dock application.
 - My interests are not adequately represented by any existing party to this proceeding.

DECLARATION: 1 OF 6

Property Interest

	5.	My property interest in relation to the Spokane River is as follows (check all that
apply)	:	
		I own and reside on riparian (waterfront) property directly fronting the Spokane
River.		
	×	I reside near the Spokane River but do not own waterfront property.
		Uses of the Spokane River
	6.	I use the Spokane River for the following purposes (check all that apply):
	X	Boating
		Fishing
	X	Kayaking
	ο.	Canoeing
	×	Paddleboarding
	×	Swimming
	×	Tubing
		Waterskiing / wakeboarding / wakesurfing
	X	Wildlife viewing / photography
		Other:
	-	
	-	

DECLARATION: 2 OF 6

Substantial Interest

- The River's Edge Apartments community dock project will directly and substantially affect my interests.
- The project will increase boat traffic and congestion on this section of the Spokane
 River.
- Increased congestion will reduce safety for all users, including myself and my family.
 - The project will interfere with my ability to use and enjoy the Spokane River.
 - The project will increase risks of collision or injury to non-motorized users.
- Noise, wakes, and congestion will diminish the recreational value of this section of the river.

13. Other impacts specific to me include:
Pinerside Harbor Will increase
due to erosion of beach land which

Adequacy of Representation

14	ł.	My interests as a property owner and/or river user are not adequately represented
by any ex	cisting	g party to this proceeding.
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Verification

15.	I declare under penalty of perjury pursuant to the laws of the State of Idano that the
foregoing is t	rue and correct. ED this 22 day of August, 2025, at BST Fa//5, Idaho.
DATE	D this A day of August, 2025, at 105/ 10/15, Idaho.
	[Signature of Declarant]
	[Signature of Declarant]

DECLARATION: 4 OF 6

I hereby certify that on the 22nd day of August 2025, I cause to be served a true and correct copy of the foregoing document by the method indicated below, and addressed to the following:

Elizabeth A. Tellessen WINSTON & CASHATT, LAWYERS, P.S. 250 Northwest Boulevard, Suite 206 Coeur d'Alene, Idaho 83814 Telephone: (208) 667-2103 Facsimile: (208) 765-2121 Attorneys for River's Edge Apartments, LLC and Lanzce Douglass	☐ By U.S. Mail ☑ By Email eat@winstoncashatt.com
Lanzce Douglass 1402 E. Magnesium Rd. # 202 Spokane, WA 99217 (509) 951-4785 Applicant	☐ By U.S. Mail ■ By Email lanzce@lgdproperties.com
Cindy Richardson R&R Northwest 1857 W. Hayden Avenue, # 102 Hayden, ID 83835 (208) 818-6478 Agent for Applicant	☐ By U.S. Mail ■ By Email cindy.richardson@rrnorthwest.com
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Sheriff Robert B. Norris Kootenai County Sheriffs Office P.O. Box 9000 Coeur d'Alene, ID 83816 (208) 446-1300 Objector	☐ By U.S. Mail ☑ By Email kcso@kcgov.us

Idaho Department of Lands	☐ By U.S. Mail
John Richards, General Counsel	☑ By Email
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300 N. 6th Street, Ste. 103	jrichards@idl.idaho.gov
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Counsel for IDL	
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Amidy Fuson	☐ By U.S. Mail
Lands Resource Specialist-Navigable Waters	☑ By Email
	•
Marde Mensinger	afuson@idl.idaho.gov
Program Manager for Navigable Waters	mmensinger@idl.idaho.gov
Kourtney Romine	☐ By U.S. Mail
Rachel King	■ By Email
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Service Contacts for IDL	kromine@idl.idaho.gov
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	kdawson@idl.idaho.gov
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P.O. Box 83720	-
Boise, ID 83720-0104	filings@oah.idaho.gov
(208) 605-4300	leslie.hayes@oah.idaho.gov
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Peter J. Smith IV, ISB #6997
FENNEMORE CRAIG, P.C.
418 E. Lakeside, Suite 224
Coeur d'Alene, Idaho 83814
T: (208) 956-0145
E: peter.smith@fennemorelaw.com
Attorneys for Concerned Citizens Against A on Spokane River Inc.

Attorneys for Concerned Citizens Against Additional 100 Boat Slips Added to Templins Resort on Spokane River Inc.

:	BEFORE THE IDAHO DE	
In the Matter of the		AGENCY Case No. PH-2025-NAV-22-005
Encroachment L95S Dock,	6163A, a Community	OAH Case No. 25-320-07
River's Edge Apartn Lanzce Douglass,	nents, LLC;	DECLARATION
	Applicant.	
		1
1. I, Dor	ng HORDE	A am a citizen of the
State of Idaho.	/	A CONTRED CITIZENIC ACADICT
2. I am involved	with and/or am a memb	oer of CONCERNED CITIZENS AGAINST TEMPLINS RESORT ON SPOKANE RIVER
INC., an Idaho nonp		TENT ENTO RESOLUTION OF STEEL STEEL
3. Pursuant to IDAI	PA 04.11.01.700 ("Interventi	on Generally"), I claim a direct and substantial
interest in this proce	eding concerning the River's	Edge Apartments community dock application.
4. My interests are n	ot adequately represented by	any existing party to this proceeding.
	Property	Interest
5. My property inter	est in relation to the Spokano	e River is as follows (check all that apply):
□ Io	wn and reside on riparian (w	raterfront) property directly fronting the Spokane
River.		
		but do not own waterfront property.
	Uses of the Sp	
	River for the following purp	boses (check all that apply):
	pating	
	shing nyaking	
	noeing	
	ddleboarding	
y Sw	imming	
	ibing	ral racourfin a
□ Wa	terskiing / wakeboarding / w	
	ldlife viewing / photography her:	
ų Oi	HCI.	
	Substanti	al Interest

- 7. The River's Edge Apartments community dock project will directly and substantially affect my interests.
- 8. The project will increase boat traffic and congestion on this section of the Spokane River.
- 9. Increased congestion will reduce safety for all users, including myself and my family.
- 10. The project will interfere with my ability to use and enjoy the Spokane River.
- 11. The project will increase risks of collision or injury to non-motorized users.
- 12. Noise, wakes, and congestion will diminish the recreational value of this section of the river.

I hereby certify that on the 22nd day of August 2025, I cause to be served a true and correct copy of the foregoing document by the method indicated below, and addressed to the following:

Elizabeth A. Tellessen WINSTON & CASHATT, LAWYERS, P.S. 250 Northwest Boulevard, Suite 206 Coeur d'Alene, Idaho 83814 Telephone: (208) 667-2103 Facsimile: (208) 765-2121 Attorneys for River's Edge Apartments, LLC and Lanzce Douglass	☐ By U.S. Mail ☑ By Email eat@winstoncashatt.com
Lanzce Douglass 1402 E. Magnesium Rd. # 202 Spokane, WA 99217 (509) 951-4785 Applicant	☐ By U.S. Mail ■ By Email lanzce@lgdproperties.com
Cindy Richardson R&R Northwest 1857 W. Hayden Avenue, # 102 Hayden, ID 83835 (208) 818-6478 Agent for Applicant	☐ By U.S. Mail ■ By Email cindy.richardson@rrnorthwest.com
Coeur d'Alene Land Company John F. Magnuson 1250 Northwood Center Court, Ste. A Coeur d'Alene, ID 83816 (208) 667-0500 Counsel for Objector CDA Land Co.	☐ By U.S. Mail ☑ By Email john@magnusononline.com
Sheriff Robert B. Norris Kootenai County Sheriffs Office P.O. Box 9000 Coeur d'Alene, ID 83816 (208) 446-1300 Objector	☐ By U.S. Mail ☑ By Email kcso@kcgov.us

Idaho Department of Lands	☐ By U.S. Mail
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Amidy Fuson	☐ By U.S. Mail
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	•
Marde Mensinger	afuson@idl.idaho.gov
Program Manager for Navigable Waters	mmensinger@idl.idaho.gov
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	rking@idl.idaho.gov
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Peter J. Smith IV, ISB #6997 FENNEMORE CRAIG, P.C. 418 E. Lakeside, Suite 224 Coeur d'Alene, Idaho 83814

T. (200) 056 0145

T: (208) 956-0145

E: <u>peter.smith@fennemorelaw.com</u>

Attorneys for Concerned Citizens Against Additional 100 Boat Slips Added to Templins Resort on Spokane River Inc.

BEFORE THE IDAHO DEPARTMENT OF LANDS

In the Matter of the Application for Encroachment L95S6163A, a Community Dock,

River's Edge Apartments, LLC; Lanzce Douglass,

Applicant.

AGENCY Case No. PH-2025-NAV-22-005 OAH Case No. 25-320-07

DECLARATION

1.	I, DOYLE KING	 am	а
citizen of th	e State of Idaho.		

- I am involved with and/or am a member of CONCERNED CITIZENS AGAINST ADDITIONAL 100 BOAT SLIPS ADDED TO TEMPLINS RESORT ON SPOKANE RIVER INC., an Idaho nonprofit corporation.
- Pursuant to IDAPA 04.11.01.700 ("Intervention Generally"), I claim a direct and substantial interest in this proceeding concerning the River's Edge Apartments community dock application.
 - My interests are not adequately represented by any existing party to this proceeding.

Property Interest

	5.	My property interest in relation to the Spokane River is as follows (check all that				
apply)						
		I own and reside on riparian (waterfront) property directly fronting the Spokane				
River.						
	Ø	I reside near the Spokane River but do not own waterfront property.				
Uses of the Spokane River						
	6.	I use the Spokane River for the following purposes (check all that apply):				
	Ø	Boating				
	X	Fishing				
		Kayaking				
		Canoeing				
	X	Paddleboarding				
	K	Swimming				
		Tubing				
		Waterskiing / wakeboarding / wakesurfing				
	×	Wildlife viewing / photography				
		Other:				
	_					
	_					
	_					

Substantial Interest

	7.	The River's Edge Apartments community dock project will directly and
substa	ntially a	affect my interests.
	8.	The project will increase boat traffic and congestion on this section of the Spokane
River.		
	9.	Increased congestion will reduce safety for all users, including myself and my
family		
	10.	The project will interfere with my ability to use and enjoy the Spokane River.
	11.	The project will increase risks of collision or injury to non-motorized users.
	12.	Noise, wakes, and congestion will diminish the recreational value of this section of
the riv	er.	
	13.	Other impacts specific to me include:
		Adequacy of Representation
	14.	My interests as a property owner and/or river user are not adequately represented
by an	y existi	ng party to this proceeding.
///		
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Verification

15. I declare under penalty of perjury pursuant to the laws of the State of Idaho that the foregoing is true and correct.

DATED this Z1 27 day of August, 2025, at Coeur d'alone Idaho.

[Signature of Declarant]

I hereby certify that on the 22nd day of August 2025, I cause to be served a true and correct copy of the foregoing document by the method indicated below, and addressed to the following:

Elizabeth A. Tellessen WINSTON & CASHATT, LAWYERS, P.S. 250 Northwest Boulevard, Suite 206 Coeur d'Alene, Idaho 83814 Telephone: (208) 667-2103 Facsimile: (208) 765-2121 Attorneys for River's Edge Apartments, LLC and Lanzce Douglass	☐ By U.S. Mail ☑ By Email eat@winstoncashatt.com
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Cindy Richardson R&R Northwest 1857 W. Hayden Avenue, # 102 Hayden, ID 83835 (208) 818-6478 Agent for Applicant	☐ By U.S. Mail ■ By Email cindy.richardson@rrnorthwest.com
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300 N. 6th Street, Ste. 103	jrichards@idl.idaho.gov
Boise, ID 83702	krichter@idl.idaho.gov
(208) 334-0200	_
Counsel for IDL	
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Amidy Fuson	☐ By U.S. Mail
Lands Resource Specialist-Navigable Waters	☑ By Email
	•
Marde Mensinger	afuson@idl.idaho.gov
Program Manager for Navigable Waters	mmensinger@idl.idaho.gov
Kourtney Romine	☐ By U.S. Mail
Rachel King	■ By Email
Kayla Dawson	
Service Contacts for IDL	kromine@idl.idaho.gov
	rking@idl.idaho.gov
	kdawson@idl.idaho.gov
OAH	☐ By U.S. Mail
General Government Division	☑ By Email
P.O. Box 83720	-
Boise, ID 83720-0104	filings@oah.idaho.gov
(208) 605-4300	leslie.hayes@oah.idaho.gov
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Peter J. Smith IV, ISB #6997 FENNEMORE CRAIG, P.C. 418 E. Lakeside, Suite 224 Coeur d'Alene, Idaho 83814

T: (208) 956-0145

E: peter.smith@fennemorelaw.com

Attorneys for Concerned Citizens Against Additional 100 Boat Slips Added to Templins Resort on Spokane River Inc.

BEFORE THE IDAHO DEPARTMENT OF LANDS

In the Matter of the Application for Encroachment L95S6163A, a Community Dock,

River's Edge Apartments, LLC; Lanzce Douglass,

Applicant.

AGENCY Case No. PH-2025-NAV-22-005 OAH Case No. 25-320-07

DECLARATION

1.	I,	Eric Hirst		am	8
citizen of the	State	of Idaho.			

- 2. I am involved with and/or am a member of CONCERNED CITIZENS AGAINST ADDITIONAL 100 BOAT SLIPS ADDED TO TEMPLINS RESORT ON SPOKANE RIVER INC., an Idaho nonprofit corporation.
- 3. Pursuant to IDAPA 04.11.01.700 ("Intervention Generally"), I claim a direct and substantial interest in this proceeding concerning the River's Edge Apartments community dock application.
 - 4. My interests are not adequately represented by any existing party to this proceeding.

Property Interest

	5.	My property interest in relation to the Spokane River is as follows (check all that
apply)	:	
	X	I own and reside on riparian (waterfront) property directly fronting the Spokane
River.		
		I reside near the Spokane River but do not own waterfront property.
		Uses of the Spokane River
	6.	I use the Spokane River for the following purposes (check all that apply):
	X	Boating
		Fishing
		Kayaking
		Canoeing
		Paddleboarding
	\square	Swimming
		Tubing
		Waterskiing / wakeboarding / wakesurfing
	×	Wildlife viewing / photography
		Other:

Substantial Interest

	7.	The River's Edge Apartments community dock project will directly and		
substa	ntially a	affect my interests.		
	8.	The project will increase boat traffic and congestion on this section of the Spokane		
River.				
	9.	Increased congestion will reduce safety for all users, including myself and my		
family				
	10.	The project will interfere with my ability to use and enjoy the Spokane River.		
	11.	The project will increase risks of collision or injury to non-motorized users.		
	12.	Noise, wakes, and congestion will diminish the recreational value of this section of		
the riv	er.			
	13. Other impacts specific to me include:			
		Adequacy of Representation		
	14.	My interests as a property owner and/or river user are not adequately represented		
by any	existin	ng party to this proceeding.		
///				
///				
///				
/// ///				

Verification

15.	I declare un	der penalty of perjury pursu	uant to the laws of the S	State of Idaho that the
foregoing is t	rue and corre	ct.		
DATE	ED this	_ day of August, 2025, at _	Post Falls	_, Idaho.
			Hirst Hirst re of Declarant]	

I hereby certify that on the 22nd day of August 2025, I cause to be served a true and correct copy of the foregoing document by the method indicated below, and addressed to the following:

Elizabeth A. Tellessen WINSTON & CASHATT, LAWYERS, P.S. 250 Northwest Boulevard, Suite 206 Coeur d'Alene, Idaho 83814 Telephone: (208) 667-2103 Facsimile: (208) 765-2121 Attorneys for River's Edge Apartments, LLC and Lanzce Douglass	☐ By U.S. Mail ☑ By Email eat@winstoncashatt.com
Lanzce Douglass 1402 E. Magnesium Rd. # 202 Spokane, WA 99217 (509) 951-4785 Applicant	☐ By U.S. Mail ■ By Email lanzce@lgdproperties.com
Cindy Richardson R&R Northwest 1857 W. Hayden Avenue, # 102 Hayden, ID 83835 (208) 818-6478 Agent for Applicant	☐ By U.S. Mail ■ By Email cindy.richardson@rrnorthwest.com
Coeur d'Alene Land Company John F. Magnuson 1250 Northwood Center Court, Ste. A Coeur d'Alene, ID 83816 (208) 667-0500 Counsel for Objector CDA Land Co.	☐ By U.S. Mail ☑ By Email john@magnusononline.com
Sheriff Robert B. Norris Kootenai County Sheriffs Office P.O. Box 9000 Coeur d'Alene, ID 83816 (208) 446-1300 Objector	☐ By U.S. Mail ☑ By Email kcso@kcgov.us

Idaho Department of Lands	☐ By U.S. Mail
John Richards, General Counsel	☑ By Email
Kayleen Richter, Counsel	
300 N. 6th Street, Ste. 103	jrichards@idl.idaho.gov
Boise, ID 83702	krichter@idl.idaho.gov
(208) 334-0200	_
Counsel for IDL	
·	
Amidy Fuson	☐ By U.S. Mail
Lands Resource Specialist-Navigable Waters	☑ By Email
	•
Marde Mensinger	afuson@idl.idaho.gov
Program Manager for Navigable Waters	mmensinger@idl.idaho.gov
Kourtney Romine	☐ By U.S. Mail
Rachel King	■ By Email
Kayla Dawson	
Service Contacts for IDL	kromine@idl.idaho.gov
	rking@idl.idaho.gov
	kdawson@idl.idaho.gov
OAH	☐ By U.S. Mail
General Government Division	☑ By Email
P.O. Box 83720	-
Boise, ID 83720-0104	filings@oah.idaho.gov
(208) 605-4300	leslie.hayes@oah.idaho.gov
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Peter J. Smith IV, ISB #6997 FENNEMORE CRAIG, P.C.

418 E. Lakeside, Suite 224

Coeur d'Alene, Idaho 83814

T: (208) 956-0145

E: peter.smith@fennemorelaw.com

Attorneys for Concerned Citizens Against Additional 100 Boat Slips Added to Templins Resort on Spokane River Inc.

BEFORE THE IDAHO DEPARTMENT OF LANDS

In the Matter of the Application for Encroachment L95S6163A, a Community Dock,

River's Edge Apartments, LLC; Lanzce Douglass.

Applicant.

AGENCY Case No. PH-2025-NAV-22-005

OAH Case No. 25-320-07

DECLARATION

1. I, <u>Grica Sheppard</u>, am a citizen of the State of Idaho.

- 2. I am involved with and/or am a member of CONCERNED CITIZENS AGAINST ADDITIONAL 100 BOAT SLIPS ADDED TO TEMPLINS RESORT ON SPOKANE RIVER INC., an Idaho nonprofit corporation.
- 3. Pursuant to IDAPA 04.11.01.700 ("Intervention Generally"), I claim a direct and substantial interest in this proceeding concerning the River's Edge Apartments community dock application.
 - My interests are not adequately represented by any existing party to this proceeding.

Property Interest

5.	My property interest in relation to the Spokane River is as follows (check all that
apply):	I own and reside on riparian (waterfront) property directly fronting the Spokane
River.	I reside near the Spokane River but do not own waterfront property
	Uses of the Spokane River
6.	I use the Spokane River for the following purposes (check all that apply):
×	Boating
X	Fishing
X	Kayaking
	Canacing
X	Paddleboarding
×	Swimming
×	Tubing
	Waterskiing / wakeboarding / wakesurfing
X	Wildlife viewing / photography
	Other:

Substantial Interest

- The River's Edge Apartments community dock project will directly and substantially affect my interests.
- 8. The project will increase boat traffic and congestion on this section of the Spokane River.
- 9. Increased congestion will reduce safety for all users, including myself and my
 - 10. The project will interfere with my ability to use and enjoy the Spokane River.
 - 11. The project will increase risks of collision or injury to non-motorized users.
- 12. Noise, wakes, and congestion will diminish the recreational value of this section of the river.

13.	Other impacts specific	to me include:	with &	sediments	_
		railer.	which	may be	

Adequacy of Representation

14.	My interests as a property owner and/or river user are not adequately represented
by any existi	ng party to this proceeding.

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Verification

15. I declare under penalty of perjury pursuant to the laws of the State of Idaho that the foregoing is true and correct.

DATED this 215th day of August, 2025, at POST Falls, Idaho.

Signature of Declarant,

I hereby certify that on the 22nd day of August 2025, I cause to be served a true and correct copy of the foregoing document by the method indicated below, and addressed to the following:

Elizabeth A. Tellessen WINSTON & CASHATT, LAWYERS, P.S. 250 Northwest Boulevard, Suite 206 Coeur d'Alene, Idaho 83814 Telephone: (208) 667-2103 Facsimile: (208) 765-2121 Attorneys for River's Edge Apartments, LLC and Lanzce Douglass	☐ By U.S. Mail ☑ By Email eat@winstoncashatt.com
Lanzce Douglass 1402 E. Magnesium Rd. # 202 Spokane, WA 99217 (509) 951-4785 Applicant	☐ By U.S. Mail ■ By Email lanzce@lgdproperties.com
Cindy Richardson R&R Northwest 1857 W. Hayden Avenue, # 102 Hayden, ID 83835 (208) 818-6478 Agent for Applicant	☐ By U.S. Mail ■ By Email cindy.richardson@rrnorthwest.com
Coeur d'Alene Land Company John F. Magnuson 1250 Northwood Center Court, Ste. A Coeur d'Alene, ID 83816 (208) 667-0500 Counsel for Objector CDA Land Co.	☐ By U.S. Mail ☑ By Email john@magnusononline.com
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Idaho Department of Lands	☐ By U.S. Mail
John Richards, General Counsel	☑ By Email
Kayleen Richter, Counsel	
300 N. 6th Street, Ste. 103	jrichards@idl.idaho.gov
Boise, ID 83702	krichter@idl.idaho.gov
(208) 334-0200	_
Counsel for IDL	
·	
Amidy Fuson	☐ By U.S. Mail
Lands Resource Specialist-Navigable Waters	☑ By Email
	•
Marde Mensinger	afuson@idl.idaho.gov
Program Manager for Navigable Waters	mmensinger@idl.idaho.gov
Kourtney Romine	☐ By U.S. Mail
Rachel King	■ By Email
Kayla Dawson	
Service Contacts for IDL	kromine@idl.idaho.gov
	rking@idl.idaho.gov
	kdawson@idl.idaho.gov
OAH	☐ By U.S. Mail
General Government Division	☑ By Email
P.O. Box 83720	-
Boise, ID 83720-0104	filings@oah.idaho.gov
(208) 605-4300	leslie.hayes@oah.idaho.gov
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Peter J. Smith IV, ISB #6997 FENNEMORE CRAIG, P.C. 418 E. Lakeside, Suite 224 Coeur d'Alene, Idaho 83814

T: (208) 956-0145

E: peter.smith@fennemorelaw.com

Attorneys for Concerned Citizens Against Additional 100 Boat Slips Added to Templins Resort on Spokane River Inc.

BEFORE THE IDAHO DEPARTMENT OF LANDS

In the Matter of the Application for Encroachment L95S6163A, a Community Dock,

River's Edge Apartments, LLC; Lanzce Douglass,

Applicant.

AGENCY Case No. PH-2025-NAV-22-005 OAH Case No. 25-320-07

DECLARATION

- 1. I, Erin Hirst _____, am a citizen of the State of Idaho.
- 2. I am involved with and/or am a member of CONCERNED CITIZENS AGAINST ADDITIONAL 100 BOAT SLIPS ADDED TO TEMPLINS RESORT ON SPOKANE RIVER INC., an Idaho nonprofit corporation.
- 3. Pursuant to IDAPA 04.11.01.700 ("Intervention Generally"), I claim a direct and substantial interest in this proceeding concerning the River's Edge Apartments community dock application.
 - 4. My interests are not adequately represented by any existing party to this proceeding.

Property Interest

	5.	My property interest in relation to the Spokane River is as follows (check all that
apply)):	
	×	I own and reside on riparian (waterfront) property directly fronting the Spokane
River.		
		I reside near the Spokane River but do not own waterfront property.
		Uses of the Spokane River
	6.	I use the Spokane River for the following purposes (check all that apply):
	×	Boating
	×	Fishing
	×	Kayaking
		Canoeing
		Paddleboarding
	×	Swimming
	×	Tubing
		Waterskiing / wakeboarding / wakesurfing
	×	Wildlife viewing / photography
		Other:

Substantial Interest

- 7. The River's Edge Apartments community dock project will directly and substantially affect my interests.
- 8. The project will increase boat traffic and congestion on this section of the Spokane River.
- 9. Increased congestion will reduce safety for all users, including myself and my family.
 - 10. The project will interfere with my ability to use and enjoy the Spokane River.
 - 11. The project will increase risks of collision or injury to non-motorized users.
- 12. Noise, wakes, and congestion will diminish the recreational value of this section of the river.
 - 13. Other impacts specific to me include:

The affect to the well being and health of the wildlife that is dependant on the rive			
for its sustenance			

Adequacy of Representation

	14.	My interests	as a prop	erty own	er and/o	r river	user	are not	adequately	y repres	sented
by any	existing	party to this	proceedi	ng.							

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Verification

15.	I declare under penalty of perjury pursuant to the laws of the State of Idaho that the	е
foregoing is t	rue and correct.	
DATE	D this 21 day of August, 2025, at Post Falls , Idaho.	
	[Signature of Declarant]	

I hereby certify that on the 22nd day of August 2025, I cause to be served a true and correct copy of the foregoing document by the method indicated below, and addressed to the following:

Elizabeth A. Tellessen WINSTON & CASHATT, LAWYERS, P.S. 250 Northwest Boulevard, Suite 206 Coeur d'Alene, Idaho 83814 Telephone: (208) 667-2103 Facsimile: (208) 765-2121 Attorneys for River's Edge Apartments, LLC and Lanzce Douglass	☐ By U.S. Mail ☑ By Email eat@winstoncashatt.com
Lanzce Douglass 1402 E. Magnesium Rd. # 202 Spokane, WA 99217 (509) 951-4785 Applicant	☐ By U.S. Mail ■ By Email lanzce@lgdproperties.com
Cindy Richardson R&R Northwest 1857 W. Hayden Avenue, # 102 Hayden, ID 83835 (208) 818-6478 Agent for Applicant	☐ By U.S. Mail ☑ By Email cindy.richardson@rrnorthwest.com
Coeur d'Alene Land Company John F. Magnuson 1250 Northwood Center Court, Ste. A Coeur d'Alene, ID 83816 (208) 667-0500 Counsel for Objector CDA Land Co.	☐ By U.S. Mail ■ By Email john@magnusononline.com
Sheriff Robert B. Norris Kootenai County Sheriffs Office P.O. Box 9000 Coeur d'Alene, ID 83816 (208) 446-1300 Objector	☐ By U.S. Mail ■ By Email kcso@kcgov.us

☐ By U.S. Mail
▼ By Email
jrichards@idl.idaho.gov
krichter@idl.idaho.gov
_
☐ By U.S. Mail
▼ By Email
afuson@idl.idaho.gov
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☐ By U.S. Mail
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rking@idl.idaho.gov
kdawson@idl.idaho.gov
☐ By U.S. Mail
▼ By Email
filings@oah.idaho.gov
leslie.hayes@oah.idaho.gov

Peter J. Smith IV, ISB #6997 FENNEMORE CRAIG, P.C. 418 E. Lakeside, Suite 224 Coeur d'Alene, Idaho 83814

T: (208) 956-0145

E: peter.smith@fennemorelaw.com

Attorneys for Concerned Citizens Against Additional 100 Boat Slips Added to Templins Resort on Spokane River Inc.

BEFORE THE IDAHO DEPARTMENT OF LANDS

In the Matter of the Application for Encroachment L95S6163A, a Community Dock.

River's Edge Apartments, LLC; Lanzce Douglass,

Applicant.

AGENCY Case No. PH-2025-NAV-22-005 OAH Case No. 25-320-07

DECLARATION

- 1. I, Gary L. Maddock, am a citizen of the State of Idaho.
- 2. I am involved with and/or am a member of CONCERNED CITIZENS AGAINST ADDITIONAL 100 BOAT SLIPS ADDED TO TEMPLINS RESORT ON SPOKANE RIVER INC., an Idaho nonprofit corporation.
- 3. Pursuant to IDAPA 04.11.01.700 ("Intervention Generally"), I claim a direct and substantial interest in this proceeding concerning the River's Edge Apartments community dock application.
 - 4. My interests are not adequately represented by any existing party to this proceeding.

Property Interest

	5.	My property interest in relation to the Spokane River is as follows (check all that
apply)):	
	X	I own and reside on riparian (waterfront) property directly fronting the Spokane
River.		
		I reside near the Spokane River but do not own waterfront property.
		Uses of the Spokane River
	6.	I use the Spokane River for the following purposes (check all that apply):
	Χ	Boating
		Fishing
	X	Kayaking
		Canoeing
	Х	Paddleboarding
	Х	Swimming
		Tubing
		Waterskiing / wakeboarding / wakesurfing
	Х	Wildlife viewing / photography
		Other:
	4	

Substantial Interest

- 7. The River's Edge Apartments community dock project will directly and substantially affect my interests.
- 8. The project will increase boat traffic and congestion on this section of the Spokane River.
- 9. Increased congestion will reduce safety for all users, including myself and my family.
 - 10. The project will interfere with my ability to use and enjoy the Spokane River.
 - 11. The project will increase risks of collision or injury to non-motorized users.
- 12. Noise, wakes, and congestion will diminish the recreational value of this section of the river.
 - 13. Other impacts specific to me include:

The excessive traffic on the River and wakes even now, without the more traffic that would result from the approval of more boat slips on the River, has caused by dock to be damage,

1) loosened and broke deck planks and siding (repairs cost \$7,000+), 2) loosened and damaged wooden poles and ripped metal holding bracket from dock (replacement cost \$9,000+) and 3) damage to boat from sever waives and rocking (est \$10,000).

Adequacy of Representation

14. My interests as a property owner and/or river user are not adequately represented by any existing party to this proceeding.

Verification

15. I declare under penalty of perjury pursuant to the laws of the State of Idaho that the foregoing is true and correct.

DATED this 21st day of August, 2025, at Post Falls, Idaho.

[Signature of Declarant]

I hereby certify that on the 22nd day of August 2025, I cause to be served a true and correct copy of the foregoing document by the method indicated below, and addressed to the following:

Elizabeth A. Tellessen WINSTON & CASHATT, LAWYERS, P.S. 250 Northwest Boulevard, Suite 206 Coeur d'Alene, Idaho 83814 Telephone: (208) 667-2103 Facsimile: (208) 765-2121 Attorneys for River's Edge Apartments, LLC and Lanzce Douglass	☐ By U.S. Mail ☑ By Email eat@winstoncashatt.com
Lanzce Douglass 1402 E. Magnesium Rd. # 202 Spokane, WA 99217 (509) 951-4785 Applicant	☐ By U.S. Mail ■ By Email lanzce@lgdproperties.com
Cindy Richardson R&R Northwest 1857 W. Hayden Avenue, # 102 Hayden, ID 83835 (208) 818-6478 Agent for Applicant	☐ By U.S. Mail ☑ By Email cindy.richardson@rrnorthwest.com
Coeur d'Alene Land Company John F. Magnuson 1250 Northwood Center Court, Ste. A Coeur d'Alene, ID 83816 (208) 667-0500 Counsel for Objector CDA Land Co.	☐ By U.S. Mail ■ By Email john@magnusononline.com
Sheriff Robert B. Norris Kootenai County Sheriffs Office P.O. Box 9000 Coeur d'Alene, ID 83816 (208) 446-1300 Objector	☐ By U.S. Mail ■ By Email kcso@kcgov.us

☐ By U.S. Mail
▼ By Email
jrichards@idl.idaho.gov
krichter@idl.idaho.gov
_
☐ By U.S. Mail
▼ By Email
afuson@idl.idaho.gov
mmensinger@idl.idaho.gov
☐ By U.S. Mail
▼ By Email
kromine@idl.idaho.gov
rking@idl.idaho.gov
kdawson@idl.idaho.gov
☐ By U.S. Mail
▼ By Email
filings@oah.idaho.gov
leslie.hayes@oah.idaho.gov

Peter J. Smith IV, ISB #6997 FENNEMORE CRAIG, P.C. 418 E. Lakeside, Suite 224 Coeur d'Alene, Idaho 83814

T: (208) 956-0145

E: peter.smith@fennemorelaw.com

Attorneys for Concerned Citizens Against Additional 100 Boat Slips Added to Templins Resort on Spokane River Inc.

BEFORE THE IDAHO DEPARTMENT OF LANDS

In the Matter of the Application for Encroachment L95S6163A, a Community Dock,

River's Edge Apartments, LLC; Lanzce Douglass,

Applicant.

AGENCY Case No. PH-2025-NAV-22-005 OAH Case No. 25-320-07

DECLARATION

1.	I,	Cina Magbee	 am	a
citizen of the	e State	e of Idaho.		

- I am involved with and/or am a member of CONCERNED CITIZENS AGAINST
 ADDITIONAL 100 BOAT SLIPS ADDED TO TEMPLINS RESORT ON SPOKANE RIVER
 INC., an Idaho nonprofit corporation.
- Pursuant to IDAPA 04.11.01.700 ("Intervention Generally"), I claim a direct and substantial interest in this proceeding concerning the River's Edge Apartments community dock application.
 - My interests are not adequately represented by any existing party to this proceeding.

DECLARATION: 1 OF 6

Property Interest

	5.	My property interest in relation to the Spokane River is as follows (check all that
apply)		
		I own and reside on riparian (waterfront) property directly fronting the Spokane
River.	,	
		I reside near the Spokane River but do not own waterfront property.
		Uses of the Spokane River
	6.	I use the Spokane River for the following purposes (check all that apply):
	d	Boating
		Fishing
	Ø	Kayaking
	d	Canoeing
	d	Paddleboarding
	d	Swimming
		Tubing
	0 /	Waterskiing / wakeboarding / wakesurfing
	V	Wildlife viewing / photography
		Other:
	0	
	_	

Substantial Interest

substantially affect my interests. 8. The project will increase boat traffic and congestion on this section of the Spoka River. 9. Increased congestion will reduce safety for all users, including myself and a family. 10. The project will interfere with my ability to use and enjoy the Spokane River. 11. The project will increase risks of collision or injury to non-motorized users. 12. Noise, wakes, and congestion will diminish the recreational value of this section	
9. Increased congestion will reduce safety for all users, including myself and refamily. 10. The project will interfere with my ability to use and enjoy the Spokane River. 11. The project will increase risks of collision or injury to non-motorized users.	
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family. 10. The project will interfere with my ability to use and enjoy the Spokane River. 11. The project will increase risks of collision or injury to non-motorized users.	my
 The project will interfere with my ability to use and enjoy the Spokane River. The project will increase risks of collision or injury to non-motorized users. 	
11. The project will increase risks of collision or injury to non-motorized users.	
12. Noise, wakes, and congestion will diminish the recreational value of this section	
	of
the river.	
13. Other impacts specific to me include:	
Adequacy of Representation	_
14. My interests as a property owner and/or river user are not adequately represen	ted
by any existing party to this proceeding.	
<i>III</i>	
///	
/// ///	

Verification

I declare under penalty of perjury pursuant to the laws of the State of Idaho that the 15. foregoing is true and correct.

DATED this 2 day of August, 2025, at Post Falls, Idaho.

Signature of Declarant

CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of August 2025, I cause to be served a true and correct copy of the foregoing document by the method indicated below, and addressed to the following:

Elizabeth A. Tellessen WINSTON & CASHATT, LAWYERS, P.S. 250 Northwest Boulevard, Suite 206 Coeur d'Alene, Idaho 83814 Telephone: (208) 667-2103 Facsimile: (208) 765-2121 Attorneys for River's Edge Apartments, LLC and Lanzce Douglass	☐ By U.S. Mail ☑ By Email eat@winstoncashatt.com
Lanzce Douglass 1402 E. Magnesium Rd. # 202 Spokane, WA 99217 (509) 951-4785 Applicant	☐ By U.S. Mail ■ By Email lanzce@lgdproperties.com
Cindy Richardson R&R Northwest 1857 W. Hayden Avenue, # 102 Hayden, ID 83835 (208) 818-6478 Agent for Applicant	☐ By U.S. Mail ■ By Email cindy.richardson@rrnorthwest.com
Coeur d'Alene Land Company John F. Magnuson 1250 Northwood Center Court, Ste. A Coeur d'Alene, ID 83816 (208) 667-0500 Counsel for Objector CDA Land Co.	☐ By U.S. Mail ☑ By Email john@magnusononline.com
Sheriff Robert B. Norris Kootenai County Sheriffs Office P.O. Box 9000 Coeur d'Alene, ID 83816 (208) 446-1300 Objector	☐ By U.S. Mail ☑ By Email kcso@kcgov.us

DECLARATION: 5 OF 6

Idaho Department of Lands	☐ By U.S. Mail
John Richards, General Counsel	☑ By Email
Kayleen Richter, Counsel	
300 N. 6th Street, Ste. 103	jrichards@idl.idaho.gov
Boise, ID 83702	krichter@idl.idaho.gov
(208) 334-0200	_
Counsel for IDL	
·	
Amidy Fuson	☐ By U.S. Mail
Lands Resource Specialist-Navigable Waters	☑ By Email
	•
Marde Mensinger	afuson@idl.idaho.gov
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Service Contacts for IDL	kromine@idl.idaho.gov
	rking@idl.idaho.gov
	kdawson@idl.idaho.gov
OAH	☐ By U.S. Mail
General Government Division	☑ By Email
P.O. Box 83720	-
Boise, ID 83720-0104	filings@oah.idaho.gov
(208) 605-4300	leslie.hayes@oah.idaho.gov
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Carah Www.de

53062104.1

Peter J. Smith IV, ISB #6997 FENNEMORE CRAIG, P.C. 418 E. Lakeside, Suite 224 Coeur d'Alene, Idaho 83814

T: (208) 956-0145

E: <u>peter.smith@fennemorelaw.com</u>

Attorneys for Concerned Citizens Against Additional 100 Boat Slips Added to Templins Resort on Spokane River Inc.

BEFORE THE IDAHO DEPARTMENT OF LANDS

In the Matter of the Application for Encroachment L95S6163A, a Community Dock,

River's Edge Apartments, LLC; Lanzce Douglass,

Applicant.

AGENCY Case No. PH-2025-NAV-22-005
OAH Case No. 25-320-07

DECLARATION

	1	L	JASONI	LUCAS	am	8
citizer		and a	e of Idaho.			

- I am involved with and/or am a member of CONCERNED CITIZENS AGAINST ADDITIONAL 100 BOAT SLIPS ADDED TO TEMPLINS RESORT ON SPOKANE RIVER INC., an Idaho nonprofit corporation.
- 3. Pursuant to IDAPA 04.11.01.700 ("Intervention Generally"), I claim a direct and substantial interest in this proceeding concerning the River's Edge Apartments community dock application.
 - 4. My interests are not adequately represented by any existing party to this proceeding.

DECLARATION: 1 OF 6

Property Interest

	5.	My property interest in relation to the Spokane River is as follows (check all that
apply)		
		I own and reside on riparian (waterfront) property directly fronting the Spokane
River.		
	×	I reside near the Spokane River but do not own waterfront property.
		Uses of the Spokane River
	6.	I use the Spokane River for the following purposes (check all that apply):
	×	Boating
		Fishing
		Kayaking
		Canoeing
		Paddleboarding
		Swimming
	•	Tubing
		Waterskiing / wakeboarding / wakesurfing
	•	Wildlife viewing / photography
i.	×	Other:
		WORK VIA BAREE

DECLARATION: 2 OF 6

Substantial Interest

- 7. The River's Edge Apartments community dock project will directly and substantially affect my interests.
- 8. The project will increase boat traffic and congestion on this section of the Spokane River.
- Increased congestion will reduce safety for all users, including myself and my family.
 - 10. The project will interfere with my ability to use and enjoy the Spokane River.
 - 11. The project will increase risks of collision or injury to non-motorized users.
- 12. Noise, wakes, and congestion will diminish the recreational value of this section of the river.

WILL HINDER AND ENDANGER
PROFESSIONAL INDUSTRIAL BOAT +
BARGE BASED WORK PROJECTS

FOR SHORE & WATER WORK.

While Little

Other impacts specific to me include:

Adequacy of Representation

14. My interests as a property owner and/or river user are not adequately represented by any existing party to this proceeding.

///

13.

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Verification

raceing is true and correct	f perjury pursuant to the laws of the State of Idaho th
A 9	DATILOANIA
DATED this day of Augu	ust, 2025, at RATHOLUM, Idaho.
	INTON UCHT
	[Signature of Declarant]
	4. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1.

WILL HIMDER AND INDANCEDIC PROJECTS INDONE PROJECTS IN COME THOSE TO SAME THOSE THOSE TO SAME THOSE THOSE TO SAME THOSE THOSE TO SAME THOSE TH

DECLARATION: 4 OF 6

CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of August 2025, I cause to be served a true and correct copy of the foregoing document by the method indicated below, and addressed to the following:

Elizabeth A. Tellessen WINSTON & CASHATT, LAWYERS, P.S. 250 Northwest Boulevard, Suite 206 Coeur d'Alene, Idaho 83814 Telephone: (208) 667-2103 Facsimile: (208) 765-2121 Attorneys for River's Edge Apartments, LLC and Lanzce Douglass	☐ By U.S. Mail ☑ By Email eat@winstoncashatt.com
Lanzce Douglass 1402 E. Magnesium Rd. # 202 Spokane, WA 99217 (509) 951-4785 Applicant	☐ By U.S. Mail ■ By Email lanzce@lgdproperties.com
Cindy Richardson R&R Northwest 1857 W. Hayden Avenue, # 102 Hayden, ID 83835 (208) 818-6478 Agent for Applicant	☐ By U.S. Mail ■ By Email cindy.richardson@rrnorthwest.com
Coeur d'Alene Land Company John F. Magnuson 1250 Northwood Center Court, Ste. A Coeur d'Alene, ID 83816 (208) 667-0500 Counsel for Objector CDA Land Co.	☐ By U.S. Mail ☑ By Email john@magnusononline.com
Sheriff Robert B. Norris Kootenai County Sheriffs Office P.O. Box 9000 Coeur d'Alene, ID 83816 (208) 446-1300 Objector	☐ By U.S. Mail ☑ By Email kcso@kcgov.us

DECLARATION: 5 OF 6

Idaho Department of Lands	☐ By U.S. Mail
John Richards, General Counsel	☑ By Email
Kayleen Richter, Counsel	
300 N. 6th Street, Ste. 103	jrichards@idl.idaho.gov
Boise, ID 83702	krichter@idl.idaho.gov
(208) 334-0200	_
Counsel for IDL	
·	
Amidy Fuson	☐ By U.S. Mail
Lands Resource Specialist-Navigable Waters	☑ By Email
	•
Marde Mensinger	afuson@idl.idaho.gov
Program Manager for Navigable Waters	mmensinger@idl.idaho.gov
Kourtney Romine	☐ By U.S. Mail
Rachel King	■ By Email
Kayla Dawson	
Service Contacts for IDL	kromine@idl.idaho.gov
	rking@idl.idaho.gov
	kdawson@idl.idaho.gov
OAH	☐ By U.S. Mail
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P.O. Box 83720	-
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, , , , , , , , , , , , , , , , , , , ,	

Carah Www.de

53062104.1

Peter J. Smith IV, ISB #6997 FENNEMORE CRAIG, P.C. 418 E. Lakeside, Suite 224 Coeur d'Alene, Idaho 83814

T: (208)

(208) 956-0145

E:

peter.smith@fennemorelaw.com

Attorneys for Concerned Citizens Against Additional 100 Boat Slips Added to Templins Resort on Spokane River Inc.

BEFORE THE IDAHO DEPARTMENT OF LANDS

In the Matter of the Application for Encroachment L95S6163A, a Community Dock.

River's Edge Apartments, LLC; Lanzce Douglass,

Applicant.

AGENCY Case No. PH-2025-NAV-22-005

OAH Case No. 25-320-07

DECLARATION

1.	Ι, _	Joseph	V.	PARRISH	,	am	а
citizen of th	e State	of Idaho.		~			

- I am involved with and/or am a member of CONCERNED CITIZENS AGAINST ADDITIONAL 100 BOAT SLIPS ADDED TO TEMPLINS RESORT ON SPOKANE RIVER INC., an Idaho nonprofit corporation.
- Pursuant to IDAPA 04.11.01.700 ("Intervention Generally"), I claim a direct and substantial interest in this proceeding concerning the River's Edge Apartments community dock application.
 - My interests are not adequately represented by any existing party to this proceeding.

DECLARATION: 1 OF 6

Property Interest

	5.	My property interest in relation to the Spokane R	iver is as	follows	(check al	ll that
apply)	:					
River.		I own and reside on riparian (waterfront) property	directly	fronting	the Spoke	ane
		I reside near the Spokane River but do not own wa	aterfront	property.		
		Uses of the Spokane River				
	6.	I use the Spokane River for the following purposes	s (check	all that a	pply):	
		Boating				
	ď	Fishing				
		Kayaking				
		Canoeing				
		Paddleboarding				
		Swimming				
	Ø	Tubing				
		Waterskiing / wakeboarding / wakesurfing				
		Wildlife viewing / photography				
		Other:				
		relaxing on my dack			-	
					-1	

Substantial Interest

	7.	The	River's	Edge	Apartments	community	dock	project	will	directly	and
substan	tially a	affect	my intere	ests.							

- The project will increase boat traffic and congestion on this section of the Spokane
 River.
- Increased congestion will reduce safety for all users, including myself and my family.
 - 10. The project will interfere with my ability to use and enjoy the Spokane River.
 - 11. The project will increase risks of collision or injury to non-motorized users.
- Noise, wakes, and congestion will diminish the recreational value of this section of the river.
 - 13. Other impacts specific to me include:

PERSON	USALETY	when a	ISING MO	y dock.	due to	EXCOS
WAKES	DISALETY aur) clan	RIOUS G	arditars	on the	doce du	eto
Ditchin	and roll	in				
1	4 10111	4	-			

Adequacy of Representation

	14.	Му	interests	as	a property	owner	and/or	river	user	are not	adequately	represented
by any	existing	g par	ty to this	pro	ceeding.							

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Verification

15. I declare under penalty of perjury pursuant to the laws of the State of Idaho that the foregoing is true and correct.

DATED this 2/5 day of August, 2025, at 543) E. MARON ET Idaho.

ignature of Declarant]

CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of August 2025, I cause to be served a true and correct copy of the foregoing document by the method indicated below, and addressed to the following:

Elizabeth A. Tellessen WINSTON & CASHATT, LAWYERS, P.S. 250 Northwest Boulevard, Suite 206 Coeur d'Alene, Idaho 83814 Telephone: (208) 667-2103 Facsimile: (208) 765-2121 Attorneys for River's Edge Apartments, LLC and Lanzce Douglass	☐ By U.S. Mail ☑ By Email eat@winstoncashatt.com
Lanzce Douglass 1402 E. Magnesium Rd. # 202 Spokane, WA 99217 (509) 951-4785 Applicant	☐ By U.S. Mail ■ By Email lanzce@lgdproperties.com
Cindy Richardson R&R Northwest 1857 W. Hayden Avenue, # 102 Hayden, ID 83835 (208) 818-6478 Agent for Applicant	☐ By U.S. Mail ■ By Email cindy.richardson@rrnorthwest.com
Coeur d'Alene Land Company John F. Magnuson 1250 Northwood Center Court, Ste. A Coeur d'Alene, ID 83816 (208) 667-0500 Counsel for Objector CDA Land Co.	☐ By U.S. Mail ☑ By Email john@magnusononline.com
Sheriff Robert B. Norris Kootenai County Sheriffs Office P.O. Box 9000 Coeur d'Alene, ID 83816 (208) 446-1300 Objector	☐ By U.S. Mail ☑ By Email kcso@kcgov.us

DECLARATION: 5 OF 6

Idaho Department of Lands	☐ By U.S. Mail
John Richards, General Counsel	☑ By Email
Kayleen Richter, Counsel	
300 N. 6th Street, Ste. 103	jrichards@idl.idaho.gov
Boise, ID 83702	krichter@idl.idaho.gov
(208) 334-0200	_
Counsel for IDL	
·	
Amidy Fuson	☐ By U.S. Mail
Lands Resource Specialist-Navigable Waters	☑ By Email
	•
Marde Mensinger	afuson@idl.idaho.gov
Program Manager for Navigable Waters	mmensinger@idl.idaho.gov
Kourtney Romine	☐ By U.S. Mail
Rachel King	■ By Email
Kayla Dawson	
Service Contacts for IDL	kromine@idl.idaho.gov
	rking@idl.idaho.gov
	kdawson@idl.idaho.gov
OAH	☐ By U.S. Mail
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P.O. Box 83720	-
Boise, ID 83720-0104	filings@oah.idaho.gov
(208) 605-4300	leslie.hayes@oah.idaho.gov
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Carah Www.de

53062104.1

Peter J. Smith IV, ISB #6997 FENNEMORE CRAIG, P.C. 418 E. Lakeside, Suite 224 Coeur d'Alene, Idaho 83814

T: (208) 956-0145

E: peter.smith@fennemorelaw.com

Attorneys for Concerned Citizens Against Additional 100 Boat Slips Added to Templins Resort on Spokane River Inc.

BEFORE THE IDAHO DEPARTMENT OF LANDS

In the Matter of the Application for Encroachment L95S6163A, a Community Dock,

River's Edge Apartments, LLC; Lanzce Douglass,

Applicant.

AGENCY Case No. PH-2025-NAV-22-005 OAH Case No. 25-320-07

DECLARATION

- 1. I, John Shappenel , am a citizen of the State of Idaho.
- 2. I am involved with and/or am a member of CONCERNED CITIZENS AGAINST ADDITIONAL 100 BOAT SLIPS ADDED TO TEMPLINS RESORT ON SPOKANE RIVER INC., an Idaho nonprofit corporation.
- Pursuant to IDAPA 04.11.01.700 ("Intervention Generally"), I claim a direct and substantial interest in this proceeding concerning the River's Edge Apartments community dock application.
 - 4. My interests are not adequately represented by any existing party to this proceeding.

DECLARATION: 1 OF 6

Property Interest

	5.	My property interest in relation to the Spokane River is as follows (check all that
apply):	
		I own and reside on riparian (waterfront) property directly fronting the Spokane
River.		
	A	I reside near the Spokane River but do not own waterfront property.
		Uses of the Spokane River
	6.	I use the Spokane River for the following purposes (check all that apply):
	×	Boating
	×	Fishing
	×	Kayaking
		Canoeing
	×	Paddleboarding
	×	Swimming
		Tubing
		Waterskiing / wakeboarding / wakesurfing
	A	Wildlife viewing / photography
		Other:

Substantial Interest

- 7. The River's Edge Apartments community dock project will directly and substantially affect my interests.
- The project will increase boat traffic and congestion on this section of the Spokane
 River.
- Increased congestion will reduce safety for all users, including myself and my family.
 - 10. The project will interfere with my ability to use and enjoy the Spokane River.
 - 11. The project will increase risks of collision or injury to non-motorized users.
- 12. Noise, wakes, and congestion will diminish the recreational value of this section of the river.
 - 13. Other impacts specific to me include:

Damage	to	river	banks	and	w	:1d/fc
ares						
areg						
aveg	200516	//) 6				

Adequacy of Representation

14. My interests as a property owner and/or river user are not adequately represented by any existing party to this proceeding.

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Verification

15.	I declare under penalty of perjury pursuant to the laws of the State of Idaho that the
foregoing is t	rue and correct.
DATE	ED this 21st day of August, 2025, at PostPuls, Idaho.
	Signature of Declarant]

CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of August 2025, I cause to be served a true and correct copy of the foregoing document by the method indicated below, and addressed to the following:

Elizabeth A. Tellessen WINSTON & CASHATT, LAWYERS, P.S. 250 Northwest Boulevard, Suite 206 Coeur d'Alene, Idaho 83814 Telephone: (208) 667-2103 Facsimile: (208) 765-2121 Attorneys for River's Edge Apartments, LLC and Lanzce Douglass	☐ By U.S. Mail ☑ By Email eat@winstoncashatt.com
Lanzce Douglass 1402 E. Magnesium Rd. # 202 Spokane, WA 99217 (509) 951-4785 Applicant	☐ By U.S. Mail ■ By Email lanzce@lgdproperties.com
Cindy Richardson R&R Northwest 1857 W. Hayden Avenue, # 102 Hayden, ID 83835 (208) 818-6478 Agent for Applicant	☐ By U.S. Mail ■ By Email cindy.richardson@rrnorthwest.com
Coeur d'Alene Land Company John F. Magnuson 1250 Northwood Center Court, Ste. A Coeur d'Alene, ID 83816 (208) 667-0500 Counsel for Objector CDA Land Co.	☐ By U.S. Mail ☑ By Email john@magnusononline.com
Sheriff Robert B. Norris Kootenai County Sheriffs Office P.O. Box 9000 Coeur d'Alene, ID 83816 (208) 446-1300 Objector	☐ By U.S. Mail ☑ By Email kcso@kcgov.us

DECLARATION: 5 OF 6

Idaho Department of Lands	☐ By U.S. Mail
John Richards, General Counsel	☑ By Email
Kayleen Richter, Counsel	
300 N. 6th Street, Ste. 103	jrichards@idl.idaho.gov
Boise, ID 83702	krichter@idl.idaho.gov
(208) 334-0200	_
Counsel for IDL	
·	
Amidy Fuson	☐ By U.S. Mail
Lands Resource Specialist-Navigable Waters	☑ By Email
	•
Marde Mensinger	afuson@idl.idaho.gov
Program Manager for Navigable Waters	mmensinger@idl.idaho.gov
Kourtney Romine	☐ By U.S. Mail
Rachel King	■ By Email
Kayla Dawson	
Service Contacts for IDL	kromine@idl.idaho.gov
	rking@idl.idaho.gov
	kdawson@idl.idaho.gov
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(208) 605-4300	leslie.hayes@oah.idaho.gov
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Carah Www.de

53062104.1

FENNEM 418 E. La	nith IV, ISB #6997 IORE CRAIG, P.C. keside, Suite 224 Mene, Idaho 83814						
T:	(208) 956-0145	8) 956-0145					
E:	peter.smith@fennemorelaw.com						
	for Concerned Citizens Against Additio ne River Inc.	nal 100 Boat Slips Added to Templins Resort					
BEFORE THE IDAHO DEPARTMENT OF LANDS In the Matter of the Application for Encroachment L95S6163A, a Community Dock, River's Edge Apartments, LLC; Lanzce Douglass, Applicant. DECLARATION 1. I,							
4. My int	erests are not adequately represented by	any existing party to this proceeding.					
	Froperty Interest 5. My property interest in relation to the Spokane River is as follows (check all that apply): I own and reside on riparian (waterfront) property directly fronting the Spokane						
River.	I reside near the Spokane River	but do not own waterfront property.					
	Uses of the Sp	ookane River					
	ne Spokane River for the following purp Boating	oses (check an that apply).					
<u> </u>							
Ū		y .					
	~ :						
12	Paddleboarding						
Ū	Swimming						
<u>-</u>	Tubing						
V		akesurfing					
	Wildlife viewing / photography Other:						
7 The R		al Interest ock project will directly and substantially affect					
	my interests.						

- 8. The project will increase boat traffic and congestion on this section of the Spokane River.
- 9. Increased congestion will reduce safety for all users, including myself and my family.
- 10. The project will interfere with my ability to use and enjoy the Spokane River.
- 11. The project will increase risks of collision or injury to non-motorized users.12. Noise, wakes, and congestion will diminish the recreational value of this section of the river.

13. Other impacts specific to me include:
to teepourbout she from me lang wakes
Adequacy of Representation
14. My interests as a property owner and/or river user are not adequately represented by any
existing party to this proceeding.
///
///
///
///
///
Verification 15. I declare under penalty of perjury pursuant to the laws of the State of Idaho that the foregoing is true and correct. DATED this 22 day of August, 2025, at 1051 Full 5, Idaho. [Signature of Declarant]

CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of August 2025, I cause to be served a true and correct copy of the foregoing document by the method indicated below, and addressed to the following:

Elizabeth A. Tellessen WINSTON & CASHATT, LAWYERS, P.S. 250 Northwest Boulevard, Suite 206 Coeur d'Alene, Idaho 83814 Telephone: (208) 667-2103 Facsimile: (208) 765-2121 Attorneys for River's Edge Apartments, LLC and Lanzce Douglass	☐ By U.S. Mail ☑ By Email eat@winstoncashatt.com
Lanzce Douglass 1402 E. Magnesium Rd. # 202 Spokane, WA 99217 (509) 951-4785 Applicant	☐ By U.S. Mail ■ By Email lanzce@lgdproperties.com
Cindy Richardson R&R Northwest 1857 W. Hayden Avenue, # 102 Hayden, ID 83835 (208) 818-6478 Agent for Applicant	☐ By U.S. Mail ☑ By Email cindy.richardson@rrnorthwest.com
Coeur d'Alene Land Company John F. Magnuson 1250 Northwood Center Court, Ste. A Coeur d'Alene, ID 83816 (208) 667-0500 Counsel for Objector CDA Land Co.	☐ By U.S. Mail ■ By Email john@magnusononline.com
Sheriff Robert B. Norris Kootenai County Sheriffs Office P.O. Box 9000 Coeur d'Alene, ID 83816 (208) 446-1300 Objector	☐ By U.S. Mail ■ By Email kcso@kcgov.us

DECLARATION: 5 OF 6

☐ By U.S. Mail
▼ By Email
jrichards@idl.idaho.gov
krichter@idl.idaho.gov
_
☐ By U.S. Mail
▼ By Email
afuson@idl.idaho.gov
mmensinger@idl.idaho.gov
☐ By U.S. Mail
▼ By Email
kromine@idl.idaho.gov
rking@idl.idaho.gov
kdawson@idl.idaho.gov
☐ By U.S. Mail
■ By Email
filings@oah.idaho.gov
leslie.hayes@oah.idaho.gov

Carah Www.de

53062104.1

Peter J. Smith IV, ISB #6997 FENNEMORE CRAIG, P.C. 418 E. Lakeside, Suite 224 Coeur d'Alene, Idaho 83814

T: (2

(208) 956-0145

E:

peter.smith@fennemorelaw.com

Attorneys for Concerned Citizens Against Additional 100 Boat Slips Added to Templins Resort on Spokane River Inc.

BEFORE THE IDAHO DEPARTMENT OF LANDS

In the Matter of the Application for Encroachment L95S6163A, a Community Dock,

River's Edge Apartments, LLC; Lanzce Douglass,

Applicant.

AGENCY Case No. PH-2025-NAV-22-005 OAH Case No. 25-320-07

DECLARATION

- 1. I, MARGO HARDING, am a citizen of the State of Idaho.
- 2. I am involved with and/or am a member of CONCERNED CITIZENS AGAINST ADDITIONAL 100 BOAT SLIPS ADDED TO TEMPLINS RESORT ON SPOKANE RIVER INC., an Idaho nonprofit corporation.
- 3. Pursuant to IDAPA 04.11.01.700 ("Intervention Generally"), I claim a direct and substantial interest in this proceeding concerning the River's Edge Apartments community dock application.
 - 4. My interests are not adequately represented by any existing party to this proceeding.

DECLARATION: 1 OF 6

Property Interest

	5.	My property interest in relation to the Spokane River is as follows (check all that
apply)):	
		I own and reside on riparian (waterfront) property directly fronting the Spokane
River.		
		I reside near the Spokane River but do not own waterfront property.
		Uses of the Spokane River
	6.	I use the Spokane River for the following purposes (check all that apply):
	½	Boating
	<u> </u>	Fishing
	7	Kayaking
		Canoeing
		Paddleboarding
		Swimming
		Tubing
		Waterskiing / wakeboarding / wakesurfing
	7	Wildlife viewing / photography
		Other:

DECLARATION: 2 OF 6

Substantial Interest

	7.	The River's Edge Apartments community dock project will directly and
substa	ntially	affect my interests.
	8.	The project will increase boat traffic and congestion on this section of the Spokane
River.		
	9.	Increased congestion will reduce safety for all users, including myself and my
family	7.	
	10.	The project will interfere with my ability to use and enjoy the Spokane River.
	11.	The project will increase risks of collision or injury to non-motorized users.
	12.	Noise, wakes, and congestion will diminish the recreational value of this section of
the riv	er.	
	13.	Other impacts specific to me include:
	Management of the Control of the Con	
		Adequacy of Representation
	14.	My interests as a property owner and/or river user are not adequately represented
by any	existin	ng party to this proceeding.
///		
///		
///		
///		
///		

DECLARATION: 3 OF 6

Verification

I declare under penalty of perjury pursuant to the laws of the State of Idaho that the 15. foregoing is true and correct.

DATED this 21 day of August, 2025, at COEAD ALENTOAho.

[Signature of Declarant]

DECLARATION: 4 OF 6

CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of August 2025, I cause to be served a true and correct copy of the foregoing document by the method indicated below, and addressed to the following:

Elizabeth A. Tellessen WINSTON & CASHATT, LAWYERS, P.S. 250 Northwest Boulevard, Suite 206 Coeur d'Alene, Idaho 83814 Telephone: (208) 667-2103 Facsimile: (208) 765-2121 Attorneys for River's Edge Apartments, LLC and Lanzce Douglass	☐ By U.S. Mail ☑ By Email eat@winstoncashatt.com
Lanzce Douglass 1402 E. Magnesium Rd. # 202 Spokane, WA 99217 (509) 951-4785 Applicant	☐ By U.S. Mail ■ By Email lanzce@lgdproperties.com
Cindy Richardson R&R Northwest 1857 W. Hayden Avenue, # 102 Hayden, ID 83835 (208) 818-6478 Agent for Applicant	☐ By U.S. Mail ☑ By Email cindy.richardson@rrnorthwest.com
Coeur d'Alene Land Company John F. Magnuson 1250 Northwood Center Court, Ste. A Coeur d'Alene, ID 83816 (208) 667-0500 Counsel for Objector CDA Land Co.	☐ By U.S. Mail ■ By Email john@magnusononline.com
Sheriff Robert B. Norris Kootenai County Sheriffs Office P.O. Box 9000 Coeur d'Alene, ID 83816 (208) 446-1300 Objector	☐ By U.S. Mail ■ By Email kcso@kcgov.us

DECLARATION: 5 OF 6

☐ By U.S. Mail
▼ By Email
jrichards@idl.idaho.gov
krichter@idl.idaho.gov
_
☐ By U.S. Mail
▼ By Email
afuson@idl.idaho.gov
mmensinger@idl.idaho.gov
☐ By U.S. Mail
▼ By Email
kromine@idl.idaho.gov
rking@idl.idaho.gov
kdawson@idl.idaho.gov
☐ By U.S. Mail
■ By Email
filings@oah.idaho.gov
leslie.hayes@oah.idaho.gov

Carah Www.de

53062104.1

Peter J. Smith IV, ISB #6997 FENNEMORE CRAIG, P.C. 418 E. Lakeside, Suite 224 Coeur d'Alene, Idaho 83814

T: (208) 956-0145

E: peter.smith@fennemorelaw.com

Attorneys for Concerned Citizens Against Additional 100 Boat Slips Added to Templins Resort on Spokane River Inc.

BEFORE THE IDAHO DEPARTMENT OF LANDS

In the Matter of the Application for Encroachment L95S6163A, a Community Dock.

River's Edge Apartments, LLC; Lanzce Douglass,

Applicant.

AGENCY Case No. PH-2025-NAV-22-005

DECLARATION

OAH Case No. 25-320-07

- 1. I, Mary K York ______, am a citizen of the State of Idaho.
- I am involved with and/or am a member of CONCERNED CITIZENS AGAINST
 ADDITIONAL 100 BOAT SLIPS ADDED TO TEMPLINS RESORT ON SPOKANE RIVER
 INC., an Idaho nonprofit corporation.
- Pursuant to IDAPA 04.11.01.700 ("Intervention Generally"), I claim a direct and substantial interest in this proceeding concerning the River's Edge Apartments community dock application.
 - My interests are not adequately represented by any existing party to this proceeding.

DECLARATION: 1 OF 6

Property Interest

5.	My property interest in relation to the Spokane River is as follows (check all that
:	
×	I own and reside on riparian (waterfront) property directly fronting the Spokane
	I reside near the Spokane River but do not own waterfront property.
	Uses of the Spokane River
6.	I use the Spokane River for the following purposes (check all that apply):
Ø	Boating
	Fishing
⊠-	Kayaking
Ø	Canoeing
Ø	Paddleboarding
\boxtimes	Swimming
Ø	Tubing
Ø	Waterskiing / wakeboarding / wakesurfing
\square	Wildlife viewing / photography
	Other:

Substantial Interest

- The River's Edge Apartments community dock project will directly and substantially affect my interests.
- The project will increase boat traffic and congestion on this section of the Spokane
 River.
- Increased congestion will reduce safety for all users, including myself and my family.
 - The project will interfere with my ability to use and enjoy the Spokane River.
 - The project will increase risks of collision or injury to non-motorized users.
- 12. Noise, wakes, and congestion will diminish the recreational value of this section of the river.
 - 13. Other impacts specific to me include:

for us and the wildlife that use the river for their survival.

Adequacy of Representation

14.	My interests a	as a property	owner	and/or river	user	are not	adequately	represented
by any exis	ting party to this	proceeding.						

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Verification

15. I declare under penalty of perjury pursuant to the laws of the State of Idaho that the
foregoing is true and correct.
DATED this day of August, 2025, at Post Falls, Idaho.
[Signature of Declarant]

CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of August 2025, I cause to be served a true and correct copy of the foregoing document by the method indicated below, and addressed to the following:

Elizabeth A. Tellessen WINSTON & CASHATT, LAWYERS, P.S. 250 Northwest Boulevard, Suite 206 Coeur d'Alene, Idaho 83814 Telephone: (208) 667-2103 Facsimile: (208) 765-2121 Attorneys for River's Edge Apartments, LLC and Lanzce Douglass	☐ By U.S. Mail ☑ By Email eat@winstoncashatt.com
Lanzce Douglass 1402 E. Magnesium Rd. # 202 Spokane, WA 99217 (509) 951-4785 Applicant	☐ By U.S. Mail ■ By Email lanzce@lgdproperties.com
Cindy Richardson R&R Northwest 1857 W. Hayden Avenue, # 102 Hayden, ID 83835 (208) 818-6478 Agent for Applicant	☐ By U.S. Mail ■ By Email cindy.richardson@rrnorthwest.com
Coeur d'Alene Land Company John F. Magnuson 1250 Northwood Center Court, Ste. A Coeur d'Alene, ID 83816 (208) 667-0500 Counsel for Objector CDA Land Co.	☐ By U.S. Mail ☑ By Email john@magnusononline.com
Sheriff Robert B. Norris Kootenai County Sheriffs Office P.O. Box 9000 Coeur d'Alene, ID 83816 (208) 446-1300 Objector	☐ By U.S. Mail ☑ By Email kcso@kcgov.us

DECLARATION: 5 OF 6

Idaho Department of Lands	☐ By U.S. Mail
John Richards, General Counsel	☑ By Email
Kayleen Richter, Counsel	
300 N. 6th Street, Ste. 103	jrichards@idl.idaho.gov
Boise, ID 83702	krichter@idl.idaho.gov
(208) 334-0200	_
Counsel for IDL	
·	
Amidy Fuson	☐ By U.S. Mail
Lands Resource Specialist-Navigable Waters	☑ By Email
	•
Marde Mensinger	afuson@idl.idaho.gov
Program Manager for Navigable Waters	mmensinger@idl.idaho.gov
Kourtney Romine	☐ By U.S. Mail
Rachel King	■ By Email
Kayla Dawson	
Service Contacts for IDL	kromine@idl.idaho.gov
	rking@idl.idaho.gov
	kdawson@idl.idaho.gov
OAH	☐ By U.S. Mail
General Government Division	☑ By Email
P.O. Box 83720	-
Boise, ID 83720-0104	filings@oah.idaho.gov
(208) 605-4300	leslie.hayes@oah.idaho.gov
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Carah Www.de

53062104.1

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T: (208) 956-0145

E: peter.smith@fennemorelaw.com

Attorneys for Concerned Citizens Against Additional 100 Boat Slips Added to Templins Resort on Spokane River Inc.

BEFORE THE IDAHO DEPARTMENT OF LANDS

In the Matter of the Application for Encroachment L95S6163A, a Community Dock,

River's Edge Apartments, LLC; Lanzce Douglass,

Applicant.

AGENCY Case No. PH-2025-NAV-22-005

OAH Case No. 25-320-07

DECLARATION

- 1. I, Michael High reside at 11992 W Span Way Rd Post Falls, ID 83854 _____, am a citizen of the State of Idaho.
- 2. I am involved with and/or am a member of CONCERNED CITIZENS AGAINST ADDITIONAL 100 BOAT SLIPS ADDED TO TEMPLINS RESORT ON SPOKANE RIVER INC., an Idaho nonprofit corporation.
- 3. Pursuant to IDAPA 04.11.01.700 ("Intervention Generally"), I claim a direct and substantial interest in this proceeding concerning the River's Edge Apartments community dock application.
 - 4. My interests are not adequately represented by any existing party to this proceeding.

DECLARATION: 1 OF 6

Property Interest

	5.	My property interest in relation to the Spokane River is as follows (check all that
apply)	:	
	X	I own and reside on riparian (waterfront) property directly fronting the Spokane
River.		
		I reside near the Spokane River but do not own waterfront property.
		Uses of the Spokane River
	6.	I use the Spokane River for the following purposes (check all that apply):
		Boating
	X	Fishing
	X	Kayaking
		Canoeing
	X	Paddleboarding
	X	Swimming
		Tubing
		Waterskiing / wakeboarding / wakesurfing
	X	Wildlife viewing / photography
		Other:

DECLARATION: 2 OF 6

Substantial Interest

	7.	The River's Edge Apartments community dock project will directly and
substa	ntially a	affect my interests.
	8.	The project will increase boat traffic and congestion on this section of the Spokane
River.		
	9.	Increased congestion will reduce safety for all users, including myself and my
family	′ .	
	10.	The project will interfere with my ability to use and enjoy the Spokane River.
	11.	The project will increase risks of collision or injury to non-motorized users.
	12.	Noise, wakes, and congestion will diminish the recreational value of this section of
the riv	er.	
	13.	Other impacts specific to me include:
		Adequacy of Representation
	14.	My interests as a property owner and/or river user are not adequately represented
by any	existir	ng party to this proceeding.
///		
///		
///		
///		

///

Verification

15.	I declare un	der penalty of perjury pursuant to the laws of	of the State of Idaho that the
foregoing is	true and corre	ct.	
DAT	ED this 21st	_ day of August, 2025, at Post Falls	, Idaho.
		luN	
		[Signature of Declarant]	

DECLARATION: 4 OF 6

CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of August 2025, I cause to be served a true and correct copy of the foregoing document by the method indicated below, and addressed to the following:

Elizabeth A. Tellessen WINSTON & CASHATT, LAWYERS, P.S. 250 Northwest Boulevard, Suite 206 Coeur d'Alene, Idaho 83814 Telephone: (208) 667-2103 Facsimile: (208) 765-2121 Attorneys for River's Edge Apartments, LLC and Lanzce Douglass	☐ By U.S. Mail ☑ By Email eat@winstoncashatt.com
Lanzce Douglass 1402 E. Magnesium Rd. # 202 Spokane, WA 99217 (509) 951-4785 Applicant	☐ By U.S. Mail ■ By Email lanzce@lgdproperties.com
Cindy Richardson R&R Northwest 1857 W. Hayden Avenue, # 102 Hayden, ID 83835 (208) 818-6478 Agent for Applicant	☐ By U.S. Mail ■ By Email cindy.richardson@rrnorthwest.com
Coeur d'Alene Land Company John F. Magnuson 1250 Northwood Center Court, Ste. A Coeur d'Alene, ID 83816 (208) 667-0500 Counsel for Objector CDA Land Co.	☐ By U.S. Mail ☑ By Email john@magnusononline.com
Sheriff Robert B. Norris Kootenai County Sheriffs Office P.O. Box 9000 Coeur d'Alene, ID 83816 (208) 446-1300 Objector	☐ By U.S. Mail ☑ By Email kcso@kcgov.us

DECLARATION: 5 OF 6

Idaho Department of Lands	☐ By U.S. Mail
John Richards, General Counsel	☑ By Email
Kayleen Richter, Counsel	
300 N. 6th Street, Ste. 103	jrichards@idl.idaho.gov
Boise, ID 83702	krichter@idl.idaho.gov
(208) 334-0200	_
Counsel for IDL	
·	
Amidy Fuson	☐ By U.S. Mail
Lands Resource Specialist-Navigable Waters	☑ By Email
	•
Marde Mensinger	afuson@idl.idaho.gov
Program Manager for Navigable Waters	mmensinger@idl.idaho.gov
Kourtney Romine	☐ By U.S. Mail
Rachel King	■ By Email
Kayla Dawson	
Service Contacts for IDL	kromine@idl.idaho.gov
	rking@idl.idaho.gov
	kdawson@idl.idaho.gov
OAH	☐ By U.S. Mail
General Government Division	☑ By Email
P.O. Box 83720	-
Boise, ID 83720-0104	filings@oah.idaho.gov
(208) 605-4300	leslie.hayes@oah.idaho.gov
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53062104.1

Peter J. Smith IV, ISB #6997 FENNEMORE CRAIG, P.C. 418 E. Lakeside, Suite 224 Coeur d'Alene, Idaho 83814

T: (208) 956-0145

E: peter.smith@fennemorelaw.com

Attorneys for Concerned Citizens Against Additional 100 Boat Slips Added to Templins Resort on Spokane River Inc.

BEFORE THE IDAHO DEPARTMENT OF LANDS

In the Matter of the Application for Encroachment L95S6163A, a Community Dock,	AGENCY Case No. PH-2025-NAV-22-005 OAH Case No. 25-320-07
River's Edge Apartments, LLC; Lanzce Douglass,	DECLARATION
Applicant.	

- 2. I am involved with and/or am a member of CONCERNED CITIZENS AGAINST ADDITIONAL 100 BOAT SLIPS ADDED TO TEMPLINS RESORT ON SPOKANE RIVER INC., an Idaho nonprofit corporation.
- 3. Pursuant to IDAPA 04.11.01.700 ("Intervention Generally"), I claim a direct and substantial interest in this proceeding concerning the River's Edge Apartments community dock application.
 - 4. My interests are not adequately represented by any existing party to this proceeding.

DECLARATION: 1 OF 6

Property Interest

	5.	My property interest in relation to the Spokane River is as follows (check all that
apply)):	
	×	I own and reside on riparian (waterfront) property directly fronting the Spokane
River.		
		I reside near the Spokane River but do not own waterfront property.
		Uses of the Spokane River
	6.	I use the Spokane River for the following purposes (check all that apply):
	$\not\succ$	Boating
	\mathbb{X}	Fishing
	×	Kayaking
	X	Canoeing
	$\not\bowtie$	Paddleboarding
	×	Swimming
	×	Tubing
	\times	Waterskiing / wakeboarding / wakesurfing
	×	Wildlife viewing / photography
		Other:

DECLARATION: 2 OF 6

Substantial Interest

	7.	The River's Edge Apartments community dock project will directly and				
substa	ntially	affect my interests.				
	8.	The project will increase boat traffic and congestion on this section of the Spokane				
River.						
	9.	Increased congestion will reduce safety for all users, including myself and my				
family						
	10.	The project will interfere with my ability to use and enjoy the Spokane River.				
	11.	The project will increase risks of collision or injury to non-motorized users.				
	12.	Noise, wakes, and congestion will diminish the recreational value of this section of				
the riv	er.					
	13.	Other impacts specific to me include:				
	Erosion of shoreline					
		Adequacy of Representation				
	14.	My interests as a property owner and/or river user are not adequately represented				
by any	existir	ng party to this proceeding.				
///						
///						
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///						

Verification

	15.	I declare under penalty of perjury pursuant to the laws of the State of Idaho that the
foregoi	ing is tr	rue and correct.
	DATE	D this 19th day of August, 2025, at Coeur d'Alene, Idaho.
Memor		
		[Signature of Declarant]

DECLARATION: 4 OF 6

CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of August 2025, I cause to be served a true and correct copy of the foregoing document by the method indicated below, and addressed to the following:

Elizabeth A. Tellessen WINSTON & CASHATT, LAWYERS, P.S. 250 Northwest Boulevard, Suite 206 Coeur d'Alene, Idaho 83814 Telephone: (208) 667-2103 Facsimile: (208) 765-2121 Attorneys for River's Edge Apartments, LLC and Lanzce Douglass	☐ By U.S. Mail ☑ By Email eat@winstoncashatt.com
Lanzce Douglass 1402 E. Magnesium Rd. # 202 Spokane, WA 99217 (509) 951-4785 Applicant	☐ By U.S. Mail ■ By Email lanzce@lgdproperties.com
Cindy Richardson R&R Northwest 1857 W. Hayden Avenue, # 102 Hayden, ID 83835 (208) 818-6478 Agent for Applicant	☐ By U.S. Mail ■ By Email cindy.richardson@rrnorthwest.com
Coeur d'Alene Land Company John F. Magnuson 1250 Northwood Center Court, Ste. A Coeur d'Alene, ID 83816 (208) 667-0500 Counsel for Objector CDA Land Co.	☐ By U.S. Mail ☑ By Email john@magnusononline.com
Sheriff Robert B. Norris Kootenai County Sheriffs Office P.O. Box 9000 Coeur d'Alene, ID 83816 (208) 446-1300 Objector	☐ By U.S. Mail ☑ By Email kcso@kcgov.us

DECLARATION: 5 OF 6

Idaho Department of Lands	☐ By U.S. Mail
John Richards, General Counsel	☑ By Email
Kayleen Richter, Counsel	
300 N. 6th Street, Ste. 103	jrichards@idl.idaho.gov
Boise, ID 83702	krichter@idl.idaho.gov
(208) 334-0200	_
Counsel for IDL	
·	
Amidy Fuson	☐ By U.S. Mail
Lands Resource Specialist-Navigable Waters	☑ By Email
	•
Marde Mensinger	afuson@idl.idaho.gov
Program Manager for Navigable Waters	mmensinger@idl.idaho.gov
Kourtney Romine	☐ By U.S. Mail
Rachel King	■ By Email
Kayla Dawson	
Service Contacts for IDL	kromine@idl.idaho.gov
	rking@idl.idaho.gov
	kdawson@idl.idaho.gov
OAH	☐ By U.S. Mail
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Carah Www.de

53062104.1

Peter J. Smith IV, ISB #6997 FENNEMORE CRAIG, P.C. 418 E. Lakeside, Suite 224 Coeur d'Alene, Idaho 83814

T: (208) 956-0145

E: peter.smith@fennemorelaw.com

Attorneys for Concerned Citizens Against Additional 100 Boat Slips Added to Templins Resort on Spokane River Inc.

BEFORE THE IDAHO DEPARTMENT OF LANDS

In the Matter of the Application for Encroachment L95S6163A, a Community Dock,

River's Edge Apartments, LLC; Lanzce Douglass,

Applicant.

AGENCY Case No. PH-2025-NAV-22-005 OAH Case No. 25-320-07

DECLARATION

- 1. I, Michele M. Maddock, am a permanent resident of the State of Idaho.
- 2. I am involved with and/or am a member of CONCERNED CITIZENS AGAINST ADDITIONAL 100 BOAT SLIPS ADDED TO TEMPLINS RESORT ON SPOKANE RIVER INC., an Idaho nonprofit corporation.
- 3. Pursuant to IDAPA 04.11.01.700 ("Intervention Generally"), I claim a direct and substantial interest in this proceeding concerning the River's Edge Apartments community dock application.
 - 4. My interests are not adequately represented by any existing party to this proceeding.

DECLARATION: 1 OF 6

Property Interest

	5.	My property interest in relation to the Spokane River is as follows (check all that
apply)	:	
	Χ	I own and reside on riparian (waterfront) property directly fronting the Spokane
River.		
		I reside near the Spokane River but do not own waterfront property.
		Uses of the Spokane River
	6.	I use the Spokane River for the following purposes (check all that apply):
	Χ	Boating
		Fishing
	X	Kayaking
		Canoeing
	X	Paddleboarding
	X	Swimming
		Tubing
		Waterskiing / wakeboarding / wakesurfing
	X	Wildlife viewing / photography
		Other:

DECLARATION: 2 OF 6

Substantial Interest

- 7. The River's Edge Apartments community dock project will directly and substantially affect my interests.
- 8. The project will increase boat traffic and congestion on this section of the Spokane River.
- 9. Increased congestion will reduce safety for all users, including myself and my family.
 - 10. The project will interfere with my ability to use and enjoy the Spokane River.
 - 11. The project will increase risks of collision or injury to non-motorized users.
- 12. Noise, wakes, and congestion will diminish the recreational value of this section of the river.
 - 13. Other impacts specific to me include:

The excessive traffic on the River and wakes even now, without the more traffic that would result from the approval of more boat slips on the River, has caused by dock to be damage,

1) loosened and broke deck planks and siding (repairs cost \$7,000+), 2) loosened and damaged wooden poles and ripped metal holding bracket from dock (replacement cost \$9,000+) and 3) damage to boat from sever waves and rocking (est \$10,000).

Adequacy of Representation

14. My interests as a property owner and/or river user are not adequately represented by any existing party to this proceeding.

Verification

15. I declare under penalty of perjury pursuant to the laws of the State of Idaho that the foregoing is true and correct.

DECLARATION: 3 OF 6

DATED this 21st day of August, 2025, at Post Falls, Idaho.

[Signat

CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of August 2025, I cause to be served a true and correct copy of the foregoing document by the method indicated below, and addressed to the following:

Elizabeth A. Tellessen WINSTON & CASHATT, LAWYERS, P.S. 250 Northwest Boulevard, Suite 206 Coeur d'Alene, Idaho 83814 Telephone: (208) 667-2103 Facsimile: (208) 765-2121 Attorneys for River's Edge Apartments, LLC and Lanzce Douglass	☐ By U.S. Mail ☑ By Email eat@winstoncashatt.com
Lanzce Douglass 1402 E. Magnesium Rd. # 202 Spokane, WA 99217 (509) 951-4785 Applicant	☐ By U.S. Mail ■ By Email lanzce@lgdproperties.com
Cindy Richardson R&R Northwest 1857 W. Hayden Avenue, # 102 Hayden, ID 83835 (208) 818-6478 Agent for Applicant	☐ By U.S. Mail ■ By Email cindy.richardson@rrnorthwest.com
Coeur d'Alene Land Company John F. Magnuson 1250 Northwood Center Court, Ste. A Coeur d'Alene, ID 83816 (208) 667-0500 Counsel for Objector CDA Land Co.	☐ By U.S. Mail ☑ By Email john@magnusononline.com
Sheriff Robert B. Norris Kootenai County Sheriffs Office P.O. Box 9000 Coeur d'Alene, ID 83816 (208) 446-1300 Objector	☐ By U.S. Mail ☑ By Email kcso@kcgov.us

DECLARATION: 5 OF 6

Idaho Department of Lands	☐ By U.S. Mail
John Richards, General Counsel	☑ By Email
Kayleen Richter, Counsel	
300 N. 6th Street, Ste. 103	jrichards@idl.idaho.gov
Boise, ID 83702	krichter@idl.idaho.gov
(208) 334-0200	_
Counsel for IDL	
·	
Amidy Fuson	☐ By U.S. Mail
Lands Resource Specialist-Navigable Waters	☑ By Email
	•
Marde Mensinger	afuson@idl.idaho.gov
Program Manager for Navigable Waters	mmensinger@idl.idaho.gov
Kourtney Romine	☐ By U.S. Mail
Rachel King	■ By Email
Kayla Dawson	
Service Contacts for IDL	kromine@idl.idaho.gov
	rking@idl.idaho.gov
	kdawson@idl.idaho.gov
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P.O. Box 83720	-
Boise, ID 83720-0104	filings@oah.idaho.gov
(208) 605-4300	leslie.hayes@oah.idaho.gov
, , , , , , , , , , , , , , , , , , , ,	

Carah Www.de

53062104.1

Peter J. Smith IV, ISB #6997 FENNEMORE CRAIG, P.C. 418 E. Lakeside, Suite 224 Coeur d'Alene, Idaho 83814

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Attorneys for Concerned Citizens Against Additional 100 Boat Slips Added to Templins Resort on Spokane River Inc.

BEFORE THE IDAHO DEPARTMENT OF LANDS			
In the Matter of the Application for Encroachment L95S6163A, a Community Dock,	AGENCY Case No. PH-2025-NAV-22-005 OAH Case No. 25-320-07		
River's Edge Apartments, LLC; Lanzce Douglass,	DECLARATION		
Applicant.			
1. I,	Patrick		
Smyly	, am a citizen of the		
State of Idaho.			
2. I am involved with and/or am a	member of CONCERNED CITIZENS AGAINST		
ADDITIONAL 100 DO AT CLING ADDED	CO TEMPI DIG DEGODE ON CDOVANE DIVED		

- 2. I am involved with and/or am a member of CONCERNED CITIZENS AGAINST ADDITIONAL 100 BOAT SLIPS ADDED TO TEMPLINS RESORT ON SPOKANE RIVER INC., an Idaho nonprofit corporation.
- 3. Pursuant to IDAPA 04.11.01.700 ("Intervention Generally"), I claim a direct and substantial interest in this proceeding concerning the River's Edge Apartments community dock application.
 - 4. My interests are not adequately represented by any existing party to this proceeding.

DECLARATION: 1 OF 6

Property Interest

	5.	My property interest in relation to the Spokane River is as follows (check all tha
apply)	:	
	x□	I own and reside on riparian (waterfront) property directly fronting the Spokane
River.		
		I reside near the Spokane River but do not own waterfront property.
		Uses of the Spokane River
	6.	I use the Spokane River for the following purposes (check all that apply):
	x□	Boating
		Fishing
		Kayaking
		Canoeing
	x□	Paddleboarding
	x□	Swimming
		Tubing
		Waterskiing / wakeboarding / wakesurfing
		Wildlife viewing / photography
		Other:

DECLARATION: 2 OF 6

Substantial Interest

substantially affect my interests. 8. The project will increase boat traffic and congestion on this section of the Sport. River. 9. Increased congestion will reduce safety for all users, including myself and family.	and		
River. 9. Increased congestion will reduce safety for all users, including myself and			
9. Increased congestion will reduce safety for all users, including myself and	cane		
family.	my		
10. The project will interfere with my ability to use and enjoy the Spokane River.			
11. The project will increase risks of collision or injury to non-motorized users.			
12. Noise, wakes, and congestion will diminish the recreational value of this secti	n of		
the river.			
13. Other impacts specific to me include:	3. Other impacts specific to me include:		
Erosion of			
shoreline			
Adequacy of Representation			
14. My interests as a property owner and/or river user are not adequately represent	nted		
by any existing party to this proceeding.			

///	
///	

Verification

	15.	I declare under penalty of perjury pursuant to the laws of the State of Idaho that the
foreg	oing is t	rue and correct.

DATED this _21____ day of August, 2025, at __Post Falls_____,

Idaho.

Signature of Declarant]

CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of August 2025, I cause to be served a true and correct copy of the foregoing document by the method indicated below, and addressed to the following:

Elizabeth A. Tellessen WINSTON & CASHATT, LAWYERS, P.S. 250 Northwest Boulevard, Suite 206 Coeur d'Alene, Idaho 83814 Telephone: (208) 667-2103 Facsimile: (208) 765-2121 Attorneys for River's Edge Apartments, LLC and Lanzce Douglass	☐ By U.S. Mail ☑ By Email eat@winstoncashatt.com
Lanzce Douglass 1402 E. Magnesium Rd. # 202 Spokane, WA 99217 (509) 951-4785 Applicant	☐ By U.S. Mail ■ By Email lanzce@lgdproperties.com
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Sheriff Robert B. Norris Kootenai County Sheriffs Office P.O. Box 9000 Coeur d'Alene, ID 83816 (208) 446-1300 Objector	☐ By U.S. Mail ☑ By Email kcso@kcgov.us

DECLARATION: 5 OF 6

☐ By U.S. Mail
▼ By Email
jrichards@idl.idaho.gov
krichter@idl.idaho.gov
_
☐ By U.S. Mail
▼ By Email
afuson@idl.idaho.gov
mmensinger@idl.idaho.gov
☐ By U.S. Mail
▼ By Email
kromine@idl.idaho.gov
rking@idl.idaho.gov
kdawson@idl.idaho.gov
☐ By U.S. Mail
■ By Email
filings@oah.idaho.gov
leslie.hayes@oah.idaho.gov

Carah Www.de

53062104.1

Peter J. Smith IV, ISB #6997 FENNEMORE CRAIG, P.C. 418 E. Lakeside, Suite 224 Coeur d'Alene, Idaho 83814

T: (208) 956-0145

E: peter.smith@fennemorelaw.com

Attorneys for Concerned Citizens Against Additional 100 Boat Slips Added to Templins Resort on Spokane River Inc.

BEFORE THE IDAHO D	EPARTMENT OF LANDS
In the Matter of the Application for Encroachment L95S6163A, a Community Dock,	AGENCY Case No. PH-2025-NAV-22-005 OAH Case No. 25-320-07
River's Edge Apartments, LLC; Lanzce Douglass, Applicant.	DECLARATION
1. I, Smyly State of Idaho.	Paula , am a citizen of the
2 3 3 3 3 3 3 3 3 3 3	1 CONCERNED OFFICENCE ACADIGE

- 2. I am involved with and/or am a member of CONCERNED CITIZENS AGAINST ADDITIONAL 100 BOAT SLIPS ADDED TO TEMPLINS RESORT ON SPOKANE RIVER INC., an Idaho nonprofit corporation.
- 3. Pursuant to IDAPA 04.11.01.700 ("Intervention Generally"), I claim a direct and substantial interest in this proceeding concerning the River's Edge Apartments community dock application.
 - 4. My interests are not adequately represented by any existing party to this proceeding.

DECLARATION: 1 OF 6

Property Interest

	5.	My property interest in relation to the Spokane River is as follows (check all tha
apply)	:	
	x□	I own and reside on riparian (waterfront) property directly fronting the Spokane
River.		
		I reside near the Spokane River but do not own waterfront property.
		Uses of the Spokane River
	6.	I use the Spokane River for the following purposes (check all that apply):
	x□	Boating
		Fishing
		Kayaking
		Canoeing
	x□	Paddleboarding
	x□	Swimming
		Tubing
		Waterskiing / wakeboarding / wakesurfing
		Wildlife viewing / photography
		Other:

DECLARATION: 2 OF 6

Substantial Interest

substantially affect my interests. 8. The project will increase boat traffic and congestion on this section of the Sprace. 9. Increased congestion will reduce safety for all users, including myself at	nd my
River.	nd my
	J
9. Increased congestion will reduce safety for all users, including myself a	J
	r.
family.	r.
10. The project will interfere with my ability to use and enjoy the Spokane Rive	
11. The project will increase risks of collision or injury to non-motorized users.	
12. Noise, wakes, and congestion will diminish the recreational value of this sec	tion of
the river.	
13. Other impacts specific to me include:	
Erosion	of
shoreline	
Adequacy of Representation	
14. My interests as a property owner and/or river user are not adequately repre	sented
by any existing party to this proceeding.	

///	
///	

Verification

1	15.	I declare under penalty of perjury pursuant to the laws of the State of Idaho that the
foregoin	ng is tru	ue and correct.
I	DATE	D this _21 day of August, 2025, atPost Falls,
Idaho.		

[Signature of Declarant]

DECLARATION: 4 OF 6

CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of August 2025, I cause to be served a true and correct copy of the foregoing document by the method indicated below, and addressed to the following:

Elizabeth A. Tellessen WINSTON & CASHATT, LAWYERS, P.S. 250 Northwest Boulevard, Suite 206 Coeur d'Alene, Idaho 83814 Telephone: (208) 667-2103 Facsimile: (208) 765-2121 Attorneys for River's Edge Apartments, LLC and Lanzce Douglass	☐ By U.S. Mail ☑ By Email eat@winstoncashatt.com
Lanzce Douglass 1402 E. Magnesium Rd. # 202 Spokane, WA 99217 (509) 951-4785 Applicant	☐ By U.S. Mail ■ By Email lanzce@lgdproperties.com
Cindy Richardson R&R Northwest 1857 W. Hayden Avenue, # 102 Hayden, ID 83835 (208) 818-6478 Agent for Applicant	☐ By U.S. Mail ☑ By Email cindy.richardson@rrnorthwest.com
Coeur d'Alene Land Company John F. Magnuson 1250 Northwood Center Court, Ste. A Coeur d'Alene, ID 83816 (208) 667-0500 Counsel for Objector CDA Land Co.	☐ By U.S. Mail ■ By Email john@magnusononline.com
Sheriff Robert B. Norris Kootenai County Sheriffs Office P.O. Box 9000 Coeur d'Alene, ID 83816 (208) 446-1300 Objector	☐ By U.S. Mail ■ By Email kcso@kcgov.us

DECLARATION: 5 OF 6

☐ By U.S. Mail
▼ By Email
jrichards@idl.idaho.gov
krichter@idl.idaho.gov
_
☐ By U.S. Mail
▼ By Email
afuson@idl.idaho.gov
mmensinger@idl.idaho.gov
☐ By U.S. Mail
▼ By Email
kromine@idl.idaho.gov
rking@idl.idaho.gov
kdawson@idl.idaho.gov
☐ By U.S. Mail
■ By Email
filings@oah.idaho.gov
leslie.hayes@oah.idaho.gov

Carah Www.de

53062104.1

Peter J. Smith IV, ISB #6997 FENNEMORE CRAIG, P.C. 418 E. Lakeside, Suite 224 Coeur d'Alene, Idaho 83814

T: (208) 956-0145

E: peter.smith@fennemorelaw.com

Attorneys for Concerned Citizens Against Additional 100 Boat Slips Added to Templins Resort on Spokane River Inc.

BEFORE THE IDAHO DEPARTMENT OF LANDS

In the Matter of the Application for Encroachment L95S6163A, a Community Dock,

River's Edge Apartments, LLC; Lanzce Douglass,

Applicant.

AGENCY Case No. PH-2025-NAV-22-005 OAH Case No. 25-320-07

DECLARATION

- 1. I, Pauline Schindler , am a citizen of the State of Idaho.
- 2. I am involved with and/or am a member of CONCERNED CITIZENS AGAINST ADDITIONAL 100 BOAT SLIPS ADDED TO TEMPLINS RESORT ON SPOKANE RIVER INC., an Idaho nonprofit corporation.
- 3. Pursuant to IDAPA 04.11.01.700 ("Intervention Generally"), I claim a direct and substantial interest in this proceeding concerning the River's Edge Apartments community dock application.
 - 4. My interests are not adequately represented by any existing party to this proceeding.

DECLARATION: 1 OF 6

Property Interest

	5.	My property interest in relation to the Spokane River is as follows (check all that
pply):	:	
	□ <u>x</u>	I own and reside on riparian (waterfront) property directly fronting the Spokane
River.		My parents own property on the river across from the Red Lion Templins, we park our boat at their dock.
		I reside near the Spokane River but do not own waterfront property.
		Uses of the Spokane River
	6.	I use the Spokane River for the following purposes (check all that apply):
	□ x	Boating
	 	Fishing
		Kayaking
		Canoeing
	X	Paddleboarding
	X	Swimming
	X	Tubing
	Ŋ	Waterskiing / wakeboarding / wakesurfing
	□ĸ	Wildlife viewing / photography
		Other:

DECLARATION: 2 OF 6

Substantial Interest

	7.	The River's Edge Apartments community dock project will directly and				
substa	ntially	affect my interests.				
	8.	The project will increase boat traffic and congestion on this section of the Spokane				
River						
	9.	Increased congestion will reduce safety for all users, including myself and my				
family	у.					
	10.	The project will interfere with my ability to use and enjoy the Spokane River.				
	11.	The project will increase risks of collision or injury to non-motorized users.				
	12.	Noise, wakes, and congestion will diminish the recreational value of this section of				
the riv	ver.					
	13. Other impacts specific to me include:					
		Adequacy of Representation				
	14.	My interests as a property owner and/or river user are not adequately represented				
by an	y existi	ng party to this proceeding.				
///						
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///						

Verification

	15.	I declare	e unde	er penalty of pe	rjury pursu	ant to the	laws of the	State of Idaho	that the
foregoi	ng is tr	ue and co	orrect.						
	DATEI	D this	22	day of August,	2025, at _	Post Falls		, Idaho.	
						re of Decla		mele	<u></u>

I hereby certify that on the 22nd day of August 2025, I cause to be served a true and correct copy of the foregoing document by the method indicated below, and addressed to the following:

Elizabeth A. Tellessen WINSTON & CASHATT, LAWYERS, P.S. 250 Northwest Boulevard, Suite 206 Coeur d'Alene, Idaho 83814 Telephone: (208) 667-2103 Facsimile: (208) 765-2121 Attorneys for River's Edge Apartments, LLC and Lanzce Douglass	☐ By U.S. Mail ☑ By Email eat@winstoncashatt.com
Lanzce Douglass 1402 E. Magnesium Rd. # 202 Spokane, WA 99217 (509) 951-4785 Applicant	☐ By U.S. Mail ■ By Email lanzce@lgdproperties.com
Cindy Richardson R&R Northwest 1857 W. Hayden Avenue, # 102 Hayden, ID 83835 (208) 818-6478 Agent for Applicant	☐ By U.S. Mail ■ By Email cindy.richardson@rrnorthwest.com
Coeur d'Alene Land Company John F. Magnuson 1250 Northwood Center Court, Ste. A Coeur d'Alene, ID 83816 (208) 667-0500 Counsel for Objector CDA Land Co.	☐ By U.S. Mail ☑ By Email john@magnusononline.com
Sheriff Robert B. Norris Kootenai County Sheriffs Office P.O. Box 9000 Coeur d'Alene, ID 83816 (208) 446-1300 Objector	☐ By U.S. Mail ☑ By Email kcso@kcgov.us

DECLARATION: 5 OF 6

Idaho Department of Lands	☐ By U.S. Mail
John Richards, General Counsel	☑ By Email
Kayleen Richter, Counsel	
300 N. 6th Street, Ste. 103	jrichards@idl.idaho.gov
Boise, ID 83702	krichter@idl.idaho.gov
(208) 334-0200	_
Counsel for IDL	
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Amidy Fuson	☐ By U.S. Mail
Lands Resource Specialist-Navigable Waters	☑ By Email
	•
Marde Mensinger	afuson@idl.idaho.gov
Program Manager for Navigable Waters	mmensinger@idl.idaho.gov
Kourtney Romine	☐ By U.S. Mail
Rachel King	■ By Email
Kayla Dawson	
Service Contacts for IDL	kromine@idl.idaho.gov
	rking@idl.idaho.gov
	kdawson@idl.idaho.gov
OAH	☐ By U.S. Mail
General Government Division	☑ By Email
P.O. Box 83720	-
Boise, ID 83720-0104	filings@oah.idaho.gov
(208) 605-4300	leslie.hayes@oah.idaho.gov
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Carah Www.de

53062104.1

Peter J. Smith IV, ISB #6997 FENNEMORE CRAIG, P.C. 418 E. Lakeside, Suite 224 Coeur d'Alene, Idaho 83814

T:

(208) 956-0145

E:

peter.smith@fennemorelaw.com

Attorneys for Concerned Citizens

BEFORE THE IDAHO DEPARTMENT OF LANDS

In the Matter of the Application for Encroachment L95S6163A, a Community Dock.

River's Edge Apartments, LLC; Lanzce Douglass,

Applicant.

AGENCY Case No. PH-2025-NAV-22-005 OAH Case No. 25-320-07

PETITION TO INTERVENE (CONCERNED CITIZENS)

Concerned Citizens Against Additional 100 Boat Slips Added to Templins Resort on Spokane River, Inc. ("Concerned Citizens"), by and through undersigned counsel, respectfully petition to intervene in this contested case pursuant to IDAPA 62.01.01.325, IDAPA 62.01.01.700, and the Lake Protection Act, Idaho Code §§ 58-1301 et seq. This Petition is supported by the Memorandum in Support of the Petition filed herewith along with declarations filed in support of the Petition.

The members and supporters of Concerned Citizens use and enjoy the Spokane River in the vicinity of the proposed encroachment. Their interests in navigation, recreation, safety, and protection of public trust resources will be directly affected by the outcome of this proceeding. Existing parties do not adequately represent these interests, and intervention will not unduly delay or broaden the issues.

Accordingly, Concerned Citizens respectfully requests that the Hearing Officer grant this Petition to Intervene and allow it to participate fully as a party in this proceeding.

DATED this 22nd day of August 2025.

FENNEMORE CRAIG, P.C.

PETER J. SMITH IV, ISB #6997

Attorney for Concerned Citizens

I hereby certify that on the 22nd day of August 2025, I cause to be served a true and correct copy of the foregoing document by the method indicated below, and addressed to the following:

Elizabeth A. Tellessen WINSTON & CASHATT, LAWYERS, P.S. 250 Northwest Boulevard, Suite 206 Coeur d'Alene, Idaho 83814 Telephone: (208) 667-2103 Facsimile: (208) 765-2121 Attorneys for River's Edge Apartments, LLC and Lanzce Douglass	☐ By U.S. Mail ☑ By Email eat@winstoncashatt.com
Lanzce Douglass 1402 E. Magnesium Rd. # 202 Spokane, WA 99217 (509) 951-4785 Applicant	☐ By U.S. Mail ■ By Email lanzce@lgdproperties.com
Cindy Richardson R&R Northwest 1857 W. Hayden Avenue, # 102 Hayden, ID 83835 (208) 818-6478 Agent for Applicant	☐ By U.S. Mail ■ By Email cindy.richardson@rrnorthwest.com
Coeur d'Alene Land Company John F. Magnuson 1250 Northwood Center Court, Ste. A Coeur d'Alene, ID 83816 (208) 667-0500 Counsel for Objector CDA Land Co.	☐ By U.S. Mail ☑ By Email john@magnusononline.com
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Idaho Department of Lands	☐ By U.S. Mail
John Richards, General Counsel	☑ By Email
Kayleen Richter, Counsel	
300 N. 6th Street, Ste. 103	jrichards@idl.idaho.gov
Boise, ID 83702	krichter@idl.idaho.gov
(208) 334-0200	_
Counsel for IDL	
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Amidy Fuson	☐ By U.S. Mail
Lands Resource Specialist-Navigable Waters	☑ By Email
	•
Marde Mensinger	afuson@idl.idaho.gov
Program Manager for Navigable Waters	mmensinger@idl.idaho.gov
Kourtney Romine	☐ By U.S. Mail
Rachel King	■ By Email
Kayla Dawson	
Service Contacts for IDL	kromine@idl.idaho.gov
	rking@idl.idaho.gov
	kdawson@idl.idaho.gov
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P.O. Box 83720	-
Boise, ID 83720-0104	filings@oah.idaho.gov
(208) 605-4300	leslie.hayes@oah.idaho.gov
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Carah Waxaide

Carah Woodside

53084289.1

Peter J. Smith IV, ISB #6997 FENNEMORE CRAIG, P.C. 418 E. Lakeside, Suite 224 Coeur d'Alene, Idaho 83814

T: (

(208) 956-0145

E:

peter.smith@fennemorelaw.com

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BEFORE THE IDAHO DEPARTMENT OF LANDS

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River's Edge Apartments, LLC; Lanzce Douglass,

Applicant.

AGENCY Case No. PH-2025-NAV-22-005 OAH Case No. 25-320-07

DECLARATION

1.	I,	Ranky	Lewis	 am	8
citizen of the	e Star	te of Idaho.			

- I am involved with and/or am a member of CONCERNED CITIZENS AGAINST ADDITIONAL 100 BOAT SLIPS ADDED TO TEMPLINS RESORT ON SPOKANE RIVER INC., an Idaho nonprofit corporation.
- Pursuant to IDAPA 04.11.01.700 ("Intervention Generally"), I claim a direct and substantial interest in this proceeding concerning the River's Edge Apartments community dock application.
 - My interests are not adequately represented by any existing party to this proceeding.

DECLARATION: 1 OF 6

Property Interest

	5.	My property interest in relation to the Spokane River is as follows (check all that
apply):	:	
		I own and reside on riparian (waterfront) property directly fronting the Spokane
River.		
	0	I reside near the Spokane River but do not own waterfront property.
		Uses of the Spokane River
	6.	I use the Spokane River for the following purposes (check all that apply):
	0	Boating
	0	Fishing
	0	Kayaking
		Canoeing
	Ø	Paddleboarding
	0	Swimming
		Tubing
		Waterskiing / wakeboarding / wakesurfing
	П	Wildlife viewing / photography
		Other:
	-	

DECLARATION: 2 OF 6

Substantial Interest

- The River's Edge Apartments community dock project will directly and substantially affect my interests.
- The project will increase boat traffic and congestion on this section of the Spokane
 River.
- Increased congestion will reduce safety for all users, including myself and my family.
 - The project will interfere with my ability to use and enjoy the Spokane River.
 - The project will increase risks of collision or injury to non-motorized users.
- Noise, wakes, and congestion will diminish the recreational value of this section of the river.

13. Other impacts specific to me include:

There are presently t	00 many
boats on the Spokane river	affecting
the quality of time on our	Riverside
Harbor beach-	

Adequacy of Representation

	14.	My interests as a property owner and/or river user are not adequately represente
by any	existin	ng party to this proceeding.

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Verification

15. I declare under penalty of perjury pursuant to the laws of the State of Idaho that the foregoing is true and correct.

DATED this 22 day of August, 2025, at Post Falls, Idaho.

[Signature of Declarant]

I hereby certify that on the 22nd day of August 2025, I cause to be served a true and correct copy of the foregoing document by the method indicated below, and addressed to the following:

Elizabeth A. Tellessen WINSTON & CASHATT, LAWYERS, P.S. 250 Northwest Boulevard, Suite 206 Coeur d'Alene, Idaho 83814 Telephone: (208) 667-2103 Facsimile: (208) 765-2121 Attorneys for River's Edge Apartments, LLC and Lanzce Douglass	☐ By U.S. Mail ☑ By Email eat@winstoncashatt.com
Lanzce Douglass 1402 E. Magnesium Rd. # 202 Spokane, WA 99217 (509) 951-4785 Applicant	☐ By U.S. Mail ■ By Email lanzce@lgdproperties.com
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DECLARATION: 5 OF 6

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300 N. 6th Street, Ste. 103	jrichards@idl.idaho.gov
Boise, ID 83702	krichter@idl.idaho.gov
(208) 334-0200	_
Counsel for IDL	
·	
Amidy Fuson	☐ By U.S. Mail
Lands Resource Specialist-Navigable Waters	☑ By Email
	•
Marde Mensinger	afuson@idl.idaho.gov
Program Manager for Navigable Waters	mmensinger@idl.idaho.gov
Kourtney Romine	☐ By U.S. Mail
Rachel King	■ By Email
Kayla Dawson	
Service Contacts for IDL	kromine@idl.idaho.gov
	rking@idl.idaho.gov
	kdawson@idl.idaho.gov
OAH	☐ By U.S. Mail
General Government Division	☑ By Email
P.O. Box 83720	-
Boise, ID 83720-0104	filings@oah.idaho.gov
(208) 605-4300	leslie.hayes@oah.idaho.gov
, , , , , , , , , , , , , , , , , , , ,	

Carah Www.de

53062104.1

Peter J. Smith IV, ISB #6997 FENNEMORE CRAIG, P.C. 418 E. Lakeside, Suite 224 Coeur d'Alene, Idaho 83814

T:

(208) 956-0145

E:

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BEFORE THE IDAHO DEPARTMENT OF LANDS

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River's Edge Apartments, LLC; Lanzce Douglass,

Applicant.

AGENCY Case No. PH-2025-NAV-22-005

OAH Case No. 25-320-07

DECLARATION

1. Rebecca Frost

I,

- ____, am a citizen of the State of Idaho.
- 2. I am involved with and/or am a member of CONCERNED CITIZENS AGAINST ADDITIONAL 100 BOAT SLIPS ADDED TO TEMPLINS RESORT ON SPOKANE RIVER INC., an Idaho nonprofit corporation.
- 3. Pursuant to IDAPA 04.11.01.700 ("Intervention Generally"), I claim a direct and substantial interest in this proceeding concerning the River's Edge Apartments community dock application.
- 4. My interests are not adequately represented by any existing party to this proceeding.

Property Interest

5. My p	property interest in relation to the Spokane River is as
	(check all that apply):
X	I own and reside on riparian (waterfront) property
directly	fronting the Spokane River.
	I reside near the Spokane River but do not own
waterfr	ont property.
	Uses of the Spokane River
6. I use	the Spokane River for the following purposes (check all
that app	
\boxtimes	Boating
	Fishing
X	Kayaking
M	Canoeing
×	Paddleboarding
X	Swimming
	Tubing
	Waterskiing / wakeboarding / wakesurfing
Q	Wildlife viewing / photography
	Other:
0	
() -	
** <u></u>	
0	
	Substantial Interest
7. The 1	River's Edge Apartments community dock project will
4 4	and substantially affect my interests.

- 8. The project will increase boat traffic and congestion on this section of the Spokane River.
- 9. Increased congestion will reduce safety for all users, including myself and my family.
- 10. The project will interfere with my ability to use and enjoy the Spokane River.
- 11. The project will increase risks of collision or injury to nonmotorized users.
- 12. Noise, wakes, and congestion will diminish the recreational value of this section of the river.

13. Other impacts specific to me include:
Adequacy of Representation
14. My interests as a property owner and/or river user are no adequately represented by any existing party to this proceeding.
Verification
15. I declare under penalty of perjury pursuant to the laws of th
State of Idaho that the foregoing is true and correct.
DATED this 2/ day of August, 2025, at
POST Falls, Idaho.
Relicion Front
[Signature of Declarant]

I hereby certify that on the 22nd day of August 2025, I cause to be served a true and correct copy of the foregoing document by the method indicated below, and addressed to the following:

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DECLARATION: 5 OF 6

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Boise, ID 83702	krichter@idl.idaho.gov
(208) 334-0200	_
Counsel for IDL	
·	
Amidy Fuson	☐ By U.S. Mail
Lands Resource Specialist-Navigable Waters	☑ By Email
	•
Marde Mensinger	afuson@idl.idaho.gov
Program Manager for Navigable Waters	mmensinger@idl.idaho.gov
Kourtney Romine	☐ By U.S. Mail
Rachel King	■ By Email
Kayla Dawson	
Service Contacts for IDL	kromine@idl.idaho.gov
	rking@idl.idaho.gov
	kdawson@idl.idaho.gov
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P.O. Box 83720	-
Boise, ID 83720-0104	filings@oah.idaho.gov
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, , , , , , , , , , , , , , , , , , , ,	

Carah Www.de

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T: (208) 956-0145

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Applicant.

AGENCY Case No. PH-2025-NAV-22-005 OAH Case No. 25-320-07

DECLARATION

- I, Richard Teich

 am a citizen of the State of Idaho.
- I am involved with and/or am a member of CONCERNED CITIZENS AGAINST ADDITIONAL 100 BOAT SLIPS ADDED TO TEMPLINS RESORT ON SPOKANE RIVER INC., an Idaho nonprofit corporation.
- Pursuant to IDAPA 04.11.01.700 ("Intervention Generally"), I claim a direct and substantial interest in this proceeding concerning the River's Edge Apartments community dock application.
 - My interests are not adequately represented by any existing party to this proceeding.

DECLARATION: 1 OF 6

Property Interest

	5.	My property interest in relation to the Spokane River is as follows (check all that
apply):		
		I own and reside on riparian (waterfront) property directly fronting the Spokane
River.		
		I reside near the Spokane River but do not own waterfront property.
		Uses of the Spokane River
	6.	I use the Spokane River for the following purposes (check all that apply):
	X	Boating
	X	Fishing
		Kayaking
		Canoeing
		Paddleboarding
	X	Swimming
	X	Tubing
		Waterskiing / wakeboarding / wakesurfing
	X	Wildlife viewing / photography
		Other:

DECLARATION: 2 OF 6

Substantial Interest

	7	The Disser'	- Edea /	\tt		ما ما ما		J:	1
	7.	The River	s Eage A	Apartments	community	dock	project will	directly	and
substa	ntially	affect my inte	rests.						
	8.	The project	will increa	se boat traff	ic and conges	stion on	this section o	f the Spok	cane
River.									
	9.	Increased co	ongestion	will reduce	safety for al	ll users,	including m	yself and	my
family	·.								
	10.	The project	will interfe	ere with my	ability to use	and enj	oy the Spokar	ne River.	
	1·1.	The project	will increa	se risks of c	ollision or in	jury to 1	non-motorized	d users.	
	12.	Noise, wake	s, and cong	gestion will	diminish the	recreati	onal value of	this sectio	n of
the riv	er.			*					
	13.	Other impac	ts specific	to me inclu	de:				
	Safe	ety o	f	my	Children,	(Grandchildren	1	and
	Greatg	grandchildren							
	ę				ē				
	Fur	ther	degrad	ate	an	1	already	fra	gile
	river_	V						,	
	•		Ade	quacy of R	epresentatio	n			
	14.	My interests			-		not adequatel	v renreser	nted
					and/or river c	isci aic	not adequater	y represer	nea
by any	existin	ng party to this	proceeding	ıg.					
///									
///									
111									

///

Verification

15.	I declare under penalty of perjury pursuant to the laws of the State of Idaho that the
foregoing is t	true and correct.

	DATED this 21st day of August, 2025, at Post F	alls,ID,
Idaho.		

DECLARATION: 4 OF 6

I hereby certify that on the 22nd day of August 2025, I cause to be served a true and correct copy of the foregoing document by the method indicated below, and addressed to the following:

Elizabeth A. Tellessen WINSTON & CASHATT, LAWYERS, P.S. 250 Northwest Boulevard, Suite 206 Coeur d'Alene, Idaho 83814 Telephone: (208) 667-2103 Facsimile: (208) 765-2121 Attorneys for River's Edge Apartments, LLC and Lanzce Douglass	☐ By U.S. Mail ☑ By Email eat@winstoncashatt.com
Lanzce Douglass 1402 E. Magnesium Rd. # 202 Spokane, WA 99217 (509) 951-4785 Applicant	☐ By U.S. Mail ■ By Email lanzce@lgdproperties.com
Cindy Richardson R&R Northwest 1857 W. Hayden Avenue, # 102 Hayden, ID 83835 (208) 818-6478 Agent for Applicant	☐ By U.S. Mail ■ By Email cindy.richardson@rrnorthwest.com
Coeur d'Alene Land Company John F. Magnuson 1250 Northwood Center Court, Ste. A Coeur d'Alene, ID 83816 (208) 667-0500 Counsel for Objector CDA Land Co.	☐ By U.S. Mail ☑ By Email john@magnusononline.com
Sheriff Robert B. Norris Kootenai County Sheriffs Office P.O. Box 9000 Coeur d'Alene, ID 83816 (208) 446-1300 Objector	☐ By U.S. Mail ☑ By Email kcso@kcgov.us

DECLARATION: 5 OF 6

Idaho Department of Lands	☐ By U.S. Mail
John Richards, General Counsel	☑ By Email
Kayleen Richter, Counsel	
300 N. 6th Street, Ste. 103	jrichards@idl.idaho.gov
Boise, ID 83702	krichter@idl.idaho.gov
(208) 334-0200	_
Counsel for IDL	
·	
Amidy Fuson	☐ By U.S. Mail
Lands Resource Specialist-Navigable Waters	☑ By Email
	•
Marde Mensinger	afuson@idl.idaho.gov
Program Manager for Navigable Waters	mmensinger@idl.idaho.gov
Kourtney Romine	☐ By U.S. Mail
Rachel King	■ By Email
Kayla Dawson	
Service Contacts for IDL	kromine@idl.idaho.gov
	rking@idl.idaho.gov
	kdawson@idl.idaho.gov
OAH	☐ By U.S. Mail
General Government Division	☑ By Email
P.O. Box 83720	-
Boise, ID 83720-0104	filings@oah.idaho.gov
(208) 605-4300	leslie.hayes@oah.idaho.gov
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Carah Www.de

53062104.1

Peter J. Smith IV, ISB #6997 FENNEMORE CRAIG, P.C. 418 E. Lakeside, Suite 224 Coeur d'Alene, Idaho 83814

T: (208) 956-0145

E: peter.smith@fennemorelaw.com

Attorneys for Concerned Citizens Against Additional 100 Boat Slips Added to Templins Resort on Spokane River Inc.

BEFORE THE IDAHO DEPARTMENT OF LANDS

In the Matter of the Application for Encroachment L95S6163A, a Community Dock,

River's Edge Apartments, LLC; Lanzce Douglass,

Applicant.

AGENCY Case No. PH-2025-NAV-22-005 OAH Case No. 25-320-07

DECLARATION

1.	I	Scott Scotipld	aı	n a	a
citizen of th	e State o	of Idaho			

- I am involved with and/or am a member of CONCERNED CITIZENS AGAINST ADDITIONAL 100 BOAT SLIPS ADDED TO TEMPLINS RESORT ON SPOKANE RIVER INC., an Idaho nonprofit corporation.
- Pursuant to IDAPA 04.11.01.700 ("Intervention Generally"), I claim a direct and substantial interest in this proceeding concerning the River's Edge Apartments community dock application.
 - My interests are not adequately represented by any existing party to this proceeding.

DECLARATION: 1 OF 6

Property Interest

	5.	My property interest in relation to the Spokane River is as follows (check all that
apply)	. ,	
	T/	I own and reside on riparian (waterfront) property directly fronting the Spokane
River.		
		I reside near the Spokane River but do not own waterfront property.
		Uses of the Spokane River
	6.	I use the Spokane River for the following purposes (check all that apply):
	\square	Boating
	d	Fishing
	d	Kayaking
		Canoeing
		Paddleboarding
	N	Swimming
		Tubing - Igo to lake
		Waterskiing wakeboarding / wakeswifing
		Wildlife viewing / photography
		Other:
	-	

DECLARATION: 2 OF 6

Substantial Interest

	7.	The River's Edge Apartments community dock project will directly and	
substa	ntially a	affect my interests.	
	8.	The project will increase boat traffic and congestion on this section of the Spokane	
River.			
	9.	Increased congestion will reduce safety for all users, including myself and my	
family			
	10.	The project will interfere with my ability to use and enjoy the Spokane River.	
	11.	The project will increase risks of collision or injury to non-motorized users.	
	12.	Noise, wakes, and congestion will diminish the recreational value of this section of	
the riv	er.		
	13. Other impacts specific to me include:		
	_		
		Adequacy of Representation	
	14.	My interests as a property owner and/or river user are not adequately represented	
by any	y existi	ng party to this proceeding.	
///			
///			
///			
///			

Verification

15.	I declare under penalty of perjury pursuant to the laws of the State of Idaho that the
	true and correct.
DAT	ED this 21st day of August, 2025, at Yost Falls, Idaho.
	[Signature of Declarant]

I hereby certify that on the 22nd day of August 2025, I cause to be served a true and correct copy of the foregoing document by the method indicated below, and addressed to the following:

Elizabeth A. Tellessen WINSTON & CASHATT, LAWYERS, P.S. 250 Northwest Boulevard, Suite 206 Coeur d'Alene, Idaho 83814 Telephone: (208) 667-2103 Facsimile: (208) 765-2121 Attorneys for River's Edge Apartments, LLC and Lanzce Douglass	☐ By U.S. Mail ☑ By Email eat@winstoncashatt.com
Lanzce Douglass 1402 E. Magnesium Rd. # 202 Spokane, WA 99217 (509) 951-4785 Applicant	☐ By U.S. Mail ■ By Email lanzce@lgdproperties.com
Cindy Richardson R&R Northwest 1857 W. Hayden Avenue, # 102 Hayden, ID 83835 (208) 818-6478 Agent for Applicant	☐ By U.S. Mail ☑ By Email cindy.richardson@rrnorthwest.com
Coeur d'Alene Land Company John F. Magnuson 1250 Northwood Center Court, Ste. A Coeur d'Alene, ID 83816 (208) 667-0500 Counsel for Objector CDA Land Co.	☐ By U.S. Mail ■ By Email john@magnusononline.com
Sheriff Robert B. Norris Kootenai County Sheriffs Office P.O. Box 9000 Coeur d'Alene, ID 83816 (208) 446-1300 Objector	☐ By U.S. Mail ■ By Email kcso@kcgov.us

DECLARATION: 5 OF 6

☐ By U.S. Mail
▼ By Email
jrichards@idl.idaho.gov
krichter@idl.idaho.gov
_
☐ By U.S. Mail
▼ By Email
afuson@idl.idaho.gov
mmensinger@idl.idaho.gov
☐ By U.S. Mail
▼ By Email
kromine@idl.idaho.gov
rking@idl.idaho.gov
kdawson@idl.idaho.gov
☐ By U.S. Mail
▼ By Email
filings@oah.idaho.gov
leslie.hayes@oah.idaho.gov

Carah Www.de

53062104.1

Peter J. Smith IV, ISB #6997 FENNEMORE CRAIG, P.C. 418 E. Lakeside, Suite 224 Coeur d'Alene, Idaho 83814

T: (208) 956-0145

E: peter.smith@fennemorelaw.com

Attorneys for Concerned Citizens Against Additional 100 Boat Slips Added to Templins Resort on Spokane River Inc.

BEFORE THE IDAHO DEPARTMENT OF LANDS

In the Matter of the Application for Encroachment L95S6163A, a Community Dock,

River's Edge Apartments, LLC; Lanzce Douglass,

Applicant.

AGENCY Case No. PH-2025-NAV-22-005 OAH Case No. 25-320-07

DECLARATION

1.	I.	Shern	Scofield	am	a
citizen of th	e Stat	- 3			

- I am involved with and/or am a member of CONCERNED CITIZENS AGAINST ADDITIONAL 100 BOAT SLIPS ADDED TO TEMPLINS RESORT ON SPOKANE RIVER INC., an Idaho nonprofit corporation.
- Pursuant to IDAPA 04.11.01.700 ("Intervention Generally"), I claim a direct and substantial interest in this proceeding concerning the River's Edge Apartments community dock application.
 - My interests are not adequately represented by any existing party to this proceeding.

DECLARATION: 1 OF 6

Property Interest

	5.	My property interest in relation to the Spokane River is as follows (check all that		
apply):				
	\square	I own and reside on riparian (waterfront) property directly fronting the Spokane		
River.				
		I reside near the Spokane River but do not own waterfront property.		
		Uses of the Spokane River		
	6.	I use the Spokane River for the following purposes (check all that apply):		
	\triangleleft	Boating		
		Fishing		
	\square	Kayaking		
		Canoeing		
	Ø	Paddleboarding		
	a	Swimming		
		Tubing (1 go on the lake)		
		Waterskiing / wakeboarding / wakesurfing		
	d	Wildlife viewing / photography		
		Other:		

DECLARATION: 2 OF 6

Substantial Interest

- The River's Edge Apartments community dock project will directly and substantially affect my interests.
- The project will increase boat traffic and congestion on this section of the Spokane
 River.
- Increased congestion will reduce safety for all users, including myself and my family.
 - The project will interfere with my ability to use and enjoy the Spokane River.
 - 11. The project will increase risks of collision or injury to non-motorized users.
- Noise, wakes, and congestion will diminish the recreational value of this section of the river.
 - 13. Other impacts specific to me include:

possibly will increase my taxes when the city count	y
has to mitigate the evosion damage of allowing	U
221+ additional boatslips on the Spokane River.	
What % of these will be more wake surf boats?	
Adequacy of Representation 70%? 80%? 90%?	

14. My interests as a property owner and/or river user are not adequately represented by any existing party to this proceeding.

///

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111

111

Verification

15.	I declare under penalty of perjury pursuant to the laws of the State of Idaho that the
foregoing is	true and correct.
DATI	ED this 21 ST day of August, 2025, at Post Falls, Idaho.
	[Signature of Declarant]

I hereby certify that on the 22nd day of August 2025, I cause to be served a true and correct copy of the foregoing document by the method indicated below, and addressed to the following:

Elizabeth A. Tellessen WINSTON & CASHATT, LAWYERS, P.S. 250 Northwest Boulevard, Suite 206 Coeur d'Alene, Idaho 83814 Telephone: (208) 667-2103 Facsimile: (208) 765-2121 Attorneys for River's Edge Apartments, LLC and Lanzce Douglass	☐ By U.S. Mail ☑ By Email eat@winstoncashatt.com
Lanzce Douglass 1402 E. Magnesium Rd. # 202 Spokane, WA 99217 (509) 951-4785 Applicant	☐ By U.S. Mail ■ By Email lanzce@lgdproperties.com
Cindy Richardson R&R Northwest 1857 W. Hayden Avenue, # 102 Hayden, ID 83835 (208) 818-6478 Agent for Applicant	☐ By U.S. Mail ☑ By Email cindy.richardson@rrnorthwest.com
Coeur d'Alene Land Company John F. Magnuson 1250 Northwood Center Court, Ste. A Coeur d'Alene, ID 83816 (208) 667-0500 Counsel for Objector CDA Land Co.	☐ By U.S. Mail ■ By Email john@magnusononline.com
Sheriff Robert B. Norris Kootenai County Sheriffs Office P.O. Box 9000 Coeur d'Alene, ID 83816 (208) 446-1300 Objector	☐ By U.S. Mail ■ By Email kcso@kcgov.us

DECLARATION: 5 OF 6

Idaho Department of Lands	☐ By U.S. Mail
John Richards, General Counsel	☑ By Email
Kayleen Richter, Counsel	
300 N. 6th Street, Ste. 103	jrichards@idl.idaho.gov
Boise, ID 83702	krichter@idl.idaho.gov
(208) 334-0200	_
Counsel for IDL	
·	
Amidy Fuson	☐ By U.S. Mail
Lands Resource Specialist-Navigable Waters	☑ By Email
	•
Marde Mensinger	afuson@idl.idaho.gov
Program Manager for Navigable Waters	mmensinger@idl.idaho.gov
Kourtney Romine	☐ By U.S. Mail
Rachel King	■ By Email
Kayla Dawson	
Service Contacts for IDL	kromine@idl.idaho.gov
	rking@idl.idaho.gov
	kdawson@idl.idaho.gov
OAH	☐ By U.S. Mail
General Government Division	☑ By Email
P.O. Box 83720	-
Boise, ID 83720-0104	filings@oah.idaho.gov
(208) 605-4300	leslie.hayes@oah.idaho.gov
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Carah Www.de

53062104.1

Peter J. Smith IV, ISB #6997 FENNEMORE CRAIG, P.C. 418 E. Lakeside, Suite 224 Coeur d'Alene, Idaho 83814

T: (208) 956-0145

E: peter.smith@fennemorelaw.com

Attorneys for Concerned Citizens Against Additional 100 Boat Slips Added to Templins Resort on Spokane River Inc.

BEFORE THE IDAHO DEPARTMENT OF LANDS

In the Matter of the Application for Encroachment L95S6163A, a Community Dock,

River's Edge Apartments, LLC; Lanzce Douglass,

Applicant.

AGENCY Case No. PH-2025-NAV-22-005
OAH Case No. 25-320-07

DECLARATION

- 1. I, STEVEN SALTUS, am a citizen of the State of Idaho.
- I am involved with and/or am a member of CONCERNED CITIZENS AGAINST
 ADDITIONAL 100 BOAT SLIPS ADDED TO TEMPLINS RESORT ON SPOKANE RIVER
 INC., an Idaho nonprofit corporation.
- 3. Pursuant to IDAPA 04.11.01.700 ("Intervention Generally"), I claim a direct and substantial interest in this proceeding concerning the River's Edge Apartments community dock application.
 - 4. My interests are not adequately represented by any existing party to this proceeding.

DECLARATION: 1 OF 6

Property Interest

	5.	My property interest in relation to the Spokane River is as follows (check all that
apply)	:	
		I own and reside on riparian (waterfront) property directly fronting the Spokane
River.		
	×	I reside near the Spokane River but do not own waterfront property.
	•	Uses of the Spokane River
	6.	I use the Spokane River for the following purposes (check all that apply):
	*	Boating
	×	Fishing
		Kayaking
		Canoeing
	×	Paddleboarding
	×	Swimming
		Tubing
		Waterskiing / wakeboarding / wakesurfing
	X	Wildlife viewing / photography
	×	Other:
		PHOTOGRAPHY, FAMILY EVENTS, CHURCHT EVENTS, ETC. ALWRYS USING THE LIVERS & LAKES, ESPECIALLY, SPOKENE RIVER
		VENTS, ETC. ALWAYS USING THE
	[2	LIVERS & LAKES, ESPECIALLY, SPOKETE RIVER

Substantial Interest

- 7. The River's Edge Apartments community dock project will directly and substantially affect my interests.
- 8. The project will increase boat traffic and congestion on this section of the Spokane River.
- 9. Increased congestion will reduce safety for all users, including myself and my family.
 - 10. The project will interfere with my ability to use and enjoy the Spokane River.
 - 11. The project will increase risks of collision or injury to non-motorized users.
- 12. Noise, wakes, and congestion will diminish the recreational value of this section of the river.

13. Other impacts specific to me include:
SAFETY WITH SWINMING IN RIVER, TOO MMY
people ALREADY, NAMON RIVER WITH BONTS
ENVINOHENTAL CONCERNS WITH FUEL OIL IN RIVER FROM BORTS. ADD DOCKS = MONE BORTS = Adequacy of Representation poon WATER
ENVINOHENTAL GNEENS WITH FUEL /OIL IN RIVER
FROM BOATS. ADD DOCKS = MONE BOATS =
GUNZII
14. My interests as a property owner and/or river user are not adequately represented

by any existing party to this proceeding.

/// /// /// /// ///

Verification

15. I declare under penalty of perjury pursuant to the laws of the State of Idaho that the foregoing is true and correct.

DATED this 21 day of August, 2025, at Post FALLS, Idaho.

Signature of Declarant]

CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of August 2025, I cause to be served a true and correct copy of the foregoing document by the method indicated below, and addressed to the following:

Elizabeth A. Tellessen WINSTON & CASHATT, LAWYERS, P.S. 250 Northwest Boulevard, Suite 206 Coeur d'Alene, Idaho 83814 Telephone: (208) 667-2103 Facsimile: (208) 765-2121 Attorneys for River's Edge Apartments, LLC and Lanzce Douglass	☐ By U.S. Mail ☑ By Email eat@winstoncashatt.com
Lanzce Douglass 1402 E. Magnesium Rd. # 202 Spokane, WA 99217 (509) 951-4785 Applicant	☐ By U.S. Mail ■ By Email lanzce@lgdproperties.com
Cindy Richardson R&R Northwest 1857 W. Hayden Avenue, # 102 Hayden, ID 83835 (208) 818-6478 Agent for Applicant	☐ By U.S. Mail ■ By Email cindy.richardson@rrnorthwest.com
Coeur d'Alene Land Company John F. Magnuson 1250 Northwood Center Court, Ste. A Coeur d'Alene, ID 83816 (208) 667-0500 Counsel for Objector CDA Land Co.	☐ By U.S. Mail ☑ By Email john@magnusononline.com
Sheriff Robert B. Norris Kootenai County Sheriffs Office P.O. Box 9000 Coeur d'Alene, ID 83816 (208) 446-1300 Objector	☐ By U.S. Mail ☑ By Email kcso@kcgov.us

DECLARATION: 5 OF 6

Idaho Department of Lands	☐ By U.S. Mail
John Richards, General Counsel	☑ By Email
Kayleen Richter, Counsel	
300 N. 6th Street, Ste. 103	jrichards@idl.idaho.gov
Boise, ID 83702	krichter@idl.idaho.gov
(208) 334-0200	_
Counsel for IDL	
·	
Amidy Fuson	☐ By U.S. Mail
Lands Resource Specialist-Navigable Waters	☑ By Email
	•
Marde Mensinger	afuson@idl.idaho.gov
Program Manager for Navigable Waters	mmensinger@idl.idaho.gov
Kourtney Romine	☐ By U.S. Mail
Rachel King	■ By Email
Kayla Dawson	
Service Contacts for IDL	kromine@idl.idaho.gov
	rking@idl.idaho.gov
	kdawson@idl.idaho.gov
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P.O. Box 83720	-
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(208) 605-4300	leslie.hayes@oah.idaho.gov
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Carah Www.de

53062104.1

Peter J. Smith IV, ISB #6997 FENNEMORE CRAIG, P.C. 418 E. Lakeside, Suite 224 Coeur d'Alene, Idaho 83814

T:

(208) 956-0145

E:

peter.smith@fennemorelaw.com

Attorneys for Concerned Citizens Against Additional 100 Boat Slips Added to Templins Resort on Spokane River Inc.

BEFORE THE IDAHO DEPARTMENT OF LANDS

In the Matter of the Application for Encroachment L95S6163A, a Community Dock,

River's Edge Apartments, LLC; Lanzce Douglass,

Applicant.

AGENCY Case No. PH-2025-NAV-22-005

OAH Case No. 25-320-07

DECLARATION

- 1. I, Susan B. Loughlin, am a citizen of the State of Idaho.
- I am involved with and/or am a member of CONCERNED CITIZENS AGAINST
 ADDITIONAL 100 BOAT SLIPS ADDED TO TEMPLINS RESORT ON SPOKANE RIVER
 INC., an Idaho nonprofit corporation.
- 3. Pursuant to IDAPA 04.11.01.700 ("Intervention Generally"), I claim a direct and substantial interest in this proceeding concerning the River's Edge Apartments community dock application.
 - 4. My interests are not adequately represented by any existing party to this proceeding.

Property Interest

DECLARATION: 1 OF 6

	5.	My property interest in relation to the Spokane River is as follows (check all that
apply):	:	
		I own and reside on riparian (waterfront) property directly fronting the Spokane
River.		
		I reside near the Spokane River but do not own waterfront property.
		Uses of the Spokane River
	6.	I use the Spokane River for the following purposes (check all that apply):
		Boating
		Fishing
		Kayaking
		Canoeing
		Paddleboarding
		Swimming
		Tubing
		Waterskiing / wakeboarding / wakesurfing
	P	Wildlife viewing / photography
		Other:

Substantial Interest

DECLARATION: 2 OF 6

	7.	The River's Edge Apartments community dock project will directly and
substa	ntially	affect my interests.
	8.	The project will increase boat traffic and congestion on this section of the Spokane
River.		
	9.	Increased congestion will reduce safety for all users, including myself and my
family	<i>'</i> .	
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the riv	er.	
	13.	Other impacts specific to me include:
		,
	,	Adequacy of Representation
	14.	My interests as a property owner and/or river user are not adequately represented
by any	existi	ng party to this proceeding.
///		
///		
///		
///		
///		

Verification

15. I declare under penalty of perjury pursuant to the laws of the State of Idaho that the
foregoing is true and correct.
DATED this 21 day of August, 2025, at Post FACLS, Idaho.
[Signature of Declarant]

CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of August 2025, I cause to be served a true and correct copy of the foregoing document by the method indicated below, and addressed to the following:

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Lanzce Douglass 1402 E. Magnesium Rd. # 202 Spokane, WA 99217 (509) 951-4785 Applicant	☐ By U.S. Mail ■ By Email lanzce@lgdproperties.com
Cindy Richardson R&R Northwest 1857 W. Hayden Avenue, # 102 Hayden, ID 83835 (208) 818-6478 Agent for Applicant	☐ By U.S. Mail ■ By Email cindy.richardson@rrnorthwest.com
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Sheriff Robert B. Norris Kootenai County Sheriffs Office P.O. Box 9000 Coeur d'Alene, ID 83816 (208) 446-1300 Objector	☐ By U.S. Mail ☑ By Email kcso@kcgov.us

DECLARATION: 5 OF 6

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Boise, ID 83702	krichter@idl.idaho.gov
(208) 334-0200	_
Counsel for IDL	
·	
Amidy Fuson	☐ By U.S. Mail
Lands Resource Specialist-Navigable Waters	☑ By Email
	•
Marde Mensinger	afuson@idl.idaho.gov
Program Manager for Navigable Waters	mmensinger@idl.idaho.gov
Kourtney Romine	☐ By U.S. Mail
Rachel King	■ By Email
Kayla Dawson	
Service Contacts for IDL	kromine@idl.idaho.gov
	rking@idl.idaho.gov
	kdawson@idl.idaho.gov
OAH	☐ By U.S. Mail
General Government Division	☑ By Email
P.O. Box 83720	-
Boise, ID 83720-0104	filings@oah.idaho.gov
(208) 605-4300	leslie.hayes@oah.idaho.gov
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Carah Www.de

53062104.1

Peter J. Smith IV, ISB #6997 FENNEMORE CRAIG, P.C. 418 E. Lakeside, Suite 224 Coeur d'Alene, Idaho 83814

T: (208) 956-0145

E: peter.smith@fennemorelaw.com

Attorneys for Concerned Citizens Against Additional 100 Boat Slips Added to Templins Resort on Spokane River Inc.

BEFORE THE IDAHO DEPARTMENT OF LANDS

In the Matter of the Application for Encroachment L95S6163A, a Community Dock,

River's Edge Apartments, LLC; Lanzce Douglass,

Applicant.

AGENCY Case No. PH-2025-NAV-22-005 OAH Case No. 25-320-07

DECLARATION

- 1. I, Teveso Teich , am a citizen of the State of Idaho.
- I am involved with and/or am a member of CONCERNED CITIZENS AGAINST ADDITIONAL 100 BOAT SLIPS ADDED TO TEMPLINS RESORT ON SPOKANE RIVER INC., an Idaho nonprofit corporation.
- Pursuant to IDAPA 04.11.01.700 ("Intervention Generally"), I claim a direct and substantial interest in this proceeding concerning the River's Edge Apartments community dock application.
 - My interests are not adequately represented by any existing party to this proceeding.

DECLARATION: 1 OF 6

Property Interest

	5.	My property interest in relation to the Spokane River is as follows (check all that
apply):		
	•	I own and reside on riparian (waterfront) property directly fronting the Spokane
River.		
1		I reside near the Spokane River but do not own waterfront property.
		Uses of the Spokane River
(6.	I use the Spokane River for the following purposes (check all that apply):
•	3	Boating
•	•	Fishing
		Kayaking
. 1		Canoeing
1		Paddleboarding
4		Swimming
4	0	Tubing
I		Waterskiing / wakeboarding / wakesurfing
4	8	Wildlife viewing / photography
[Other:

DECLARATION: 2 OF 6

Substantial Interest

- The River's Edge Apartments community dock project will directly and substantially affect my interests.
- The project will increase boat traffic and congestion on this section of the Spokane
 River.
- Increased congestion will reduce safety for all users, including myself and my family.
 - 10. The project will interfere with my ability to use and enjoy the Spokane River.
 - 11. The project will increase risks of collision or injury to non-motorized users.
- 12. Noise, wakes, and congestion will diminish the recreational value of this section of the river.
 - 13. Other impacts specific to me include:

Inability to safely use the river by
my solf children durugepilgran
+ greatgrand children
,

Adequacy of Representation

1	4. M	y interests	as a p	property	owner	and/or	river	user	are no	adequately	represented
by any e	kisting p	arty to this	proce	eeding.							

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///
///

Verification

15.	I declare under penalty of perjury pursuant to the laws of the State of Idaho that the
foregoing is	true and correct.

DATED this 21st day of August, 2025, at Post Fell, Idaho.

[Signature of Declarant]

DECLARATION: 4 OF 6

CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of August 2025, I cause to be served a true and correct copy of the foregoing document by the method indicated below, and addressed to the following:

Elizabeth A. Tellessen WINSTON & CASHATT, LAWYERS, P.S. 250 Northwest Boulevard, Suite 206 Coeur d'Alene, Idaho 83814 Telephone: (208) 667-2103 Facsimile: (208) 765-2121 Attorneys for River's Edge Apartments, LLC and Lanzce Douglass	☐ By U.S. Mail ☑ By Email eat@winstoncashatt.com
Lanzce Douglass 1402 E. Magnesium Rd. # 202 Spokane, WA 99217 (509) 951-4785 Applicant	☐ By U.S. Mail ■ By Email lanzce@lgdproperties.com
Cindy Richardson R&R Northwest 1857 W. Hayden Avenue, # 102 Hayden, ID 83835 (208) 818-6478 Agent for Applicant	☐ By U.S. Mail ■ By Email cindy.richardson@rrnorthwest.com
Coeur d'Alene Land Company John F. Magnuson 1250 Northwood Center Court, Ste. A Coeur d'Alene, ID 83816 (208) 667-0500 Counsel for Objector CDA Land Co.	☐ By U.S. Mail ☑ By Email john@magnusononline.com
Sheriff Robert B. Norris Kootenai County Sheriffs Office P.O. Box 9000 Coeur d'Alene, ID 83816 (208) 446-1300 Objector	☐ By U.S. Mail ☑ By Email kcso@kcgov.us

DECLARATION: 5 OF 6

Idaho Department of Lands	☐ By U.S. Mail
John Richards, General Counsel	☑ By Email
Kayleen Richter, Counsel	
300 N. 6th Street, Ste. 103	jrichards@idl.idaho.gov
Boise, ID 83702	krichter@idl.idaho.gov
(208) 334-0200	_
Counsel for IDL	
·	
Amidy Fuson	☐ By U.S. Mail
Lands Resource Specialist-Navigable Waters	☑ By Email
	•
Marde Mensinger	afuson@idl.idaho.gov
Program Manager for Navigable Waters	mmensinger@idl.idaho.gov
Kourtney Romine	☐ By U.S. Mail
Rachel King	■ By Email
Kayla Dawson	
Service Contacts for IDL	kromine@idl.idaho.gov
	rking@idl.idaho.gov
	kdawson@idl.idaho.gov
OAH	☐ By U.S. Mail
General Government Division	☑ By Email
P.O. Box 83720	-
Boise, ID 83720-0104	filings@oah.idaho.gov
(208) 605-4300	leslie.hayes@oah.idaho.gov
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Carah Www.de

53062104.1

Peter J. Smith IV, ISB #6997 FENNEMORE CRAIG, P.C. 418 E. Lakeside, Suite 224 Coeur d'Alene, Idaho 83814

T: (208) 956-0145

E: peter.smith@fennemorelaw.com

Attorneys for Concerned Citizens Against Additional 100 Boat Slips Added to Templins Resort on Spokane River Inc.

BEFORE THE IDAHO DEPARTMENT OF LANDS

In the Matter of the Application for Encroachment L95S6163A, a Community Dock,

River's Edge Apartments, LLC; Lanzce Douglass,

Applicant.

AGENCY Case No. PH-2025-NAV-22-005 OAH Case No. 25-320-07

DECLARATION

1. I.	Terri Skields	, am a
citizen of the State	1 (

- I am involved with and/or am a member of CONCERNED CITIZENS AGAINST ADDITIONAL 100 BOAT SLIPS ADDED TO TEMPLINS RESORT ON SPOKANE RIVER INC., an Idaho nonprofit corporation.
- Pursuant to IDAPA 04.11.01.700 ("Intervention Generally"), I claim a direct and substantial interest in this proceeding concerning the River's Edge Apartments community dock application.
 - My interests are not adequately represented by any existing party to this proceeding.

DECLARATION: 1 OF 6

Property Interest

	5.	My property interest in relation to the Spokane River is as follows (check all that
apply)	:	
	×	I own and reside on riparian (waterfront) property directly fronting the Spokane
River.		
		I reside near the Spokane River but do not own waterfront property.
		Uses of the Spokane River
	6.	I use the Spokane River for the following purposes (check all that apply):
	B	Boating
	区	Fishing
	Ø	Kayaking
	Ø	Canoeing
	A	Paddleboarding
	4	Swimming
	A	Tubing
	4	Waterskiing / wakeboarding / wakesurfing
	P	Wildlife viewing / photography
		Other:
	76	

DECLARATION: 2 OF 6

Substantial Interest

- The River's Edge Apartments community dock project will directly and substantially affect my interests.
- The project will increase boat traffic and congestion on this section of the Spokane
 River.
- Increased congestion will reduce safety for all users, including myself and my family.
 - The project will interfere with my ability to use and enjoy the Spokane River.
 - The project will increase risks of collision or injury to non-motorized users.
- Noise, wakes, and congestion will diminish the recreational value of this section of the river.

Pal	Other impa	nI	46	cale:	when	people	use
9h	river	a5	a 9	ofall 1	boilet.		

Adequacy of Representation

14.	My interests as a property owner	r and/or river user are not adequately represented
by any exi	sting party to this proceeding.	

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Verification

15.	I declare under penalty of perjury pursuant to the laws of the State of Idaho that the
foregoing is	rue and correct.
DAT	ED this 22 day of August, 2025, at Post Fall, Idaho.
	Pein Shields
	[Signature of Declarant]

CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of August 2025, I cause to be served a true and correct copy of the foregoing document by the method indicated below, and addressed to the following:

Elizabeth A. Tellessen WINSTON & CASHATT, LAWYERS, P.S. 250 Northwest Boulevard, Suite 206 Coeur d'Alene, Idaho 83814 Telephone: (208) 667-2103 Facsimile: (208) 765-2121 Attorneys for River's Edge Apartments, LLC and Lanzce Douglass	☐ By U.S. Mail ☑ By Email eat@winstoncashatt.com
Lanzce Douglass 1402 E. Magnesium Rd. # 202 Spokane, WA 99217 (509) 951-4785 Applicant	☐ By U.S. Mail ■ By Email lanzce@lgdproperties.com
Cindy Richardson R&R Northwest 1857 W. Hayden Avenue, # 102 Hayden, ID 83835 (208) 818-6478 Agent for Applicant	☐ By U.S. Mail ■ By Email cindy.richardson@rrnorthwest.com
Coeur d'Alene Land Company John F. Magnuson 1250 Northwood Center Court, Ste. A Coeur d'Alene, ID 83816 (208) 667-0500 Counsel for Objector CDA Land Co.	☐ By U.S. Mail ☑ By Email john@magnusononline.com
Sheriff Robert B. Norris Kootenai County Sheriffs Office P.O. Box 9000 Coeur d'Alene, ID 83816 (208) 446-1300 Objector	☐ By U.S. Mail ☑ By Email kcso@kcgov.us

DECLARATION: 5 OF 6

Idaho Department of Lands	☐ By U.S. Mail
John Richards, General Counsel	☑ By Email
Kayleen Richter, Counsel	
300 N. 6th Street, Ste. 103	jrichards@idl.idaho.gov
Boise, ID 83702	krichter@idl.idaho.gov
(208) 334-0200	_
Counsel for IDL	
·	
Amidy Fuson	☐ By U.S. Mail
Lands Resource Specialist-Navigable Waters	☑ By Email
	•
Marde Mensinger	afuson@idl.idaho.gov
Program Manager for Navigable Waters	mmensinger@idl.idaho.gov
Kourtney Romine	☐ By U.S. Mail
Rachel King	■ By Email
Kayla Dawson	
Service Contacts for IDL	kromine@idl.idaho.gov
	rking@idl.idaho.gov
	kdawson@idl.idaho.gov
OAH	☐ By U.S. Mail
General Government Division	☑ By Email
P.O. Box 83720	-
Boise, ID 83720-0104	filings@oah.idaho.gov
(208) 605-4300	leslie.hayes@oah.idaho.gov
, , , , , , , , , , , , , , , , , , , ,	

Carah Www.de

53062104.1

Peter J. Smith IV, ISB #6997 FENNEMORE CRAIG, P.C. 418 E. Lakeside, Suite 224 Coeur d'Alene, Idaho 83814

T: (

(208) 956-0145

E:

peter.smith@fennemorelaw.com

Attorneys for Concerned Citizens Against Additional 100 Boat Slips Added to Templins Resort on Spokane River Inc.

BEFORE THE IDAHO DEPARTMENT OF LANDS

In the Matter of the Application for Encroachment L95S6163A, a Community Dock,

River's Edge Apartments, LLC; Lanzce Douglass,

Applicant.

AGENCY Case No. PH-2025-NAV-22-005

OAH Case No. 25-320-07

DECLARATION

- 1. I, Traci M. Parrish , am a citizen of the State of Idaho.
- I am involved with and/or am a member of CONCERNED CITIZENS AGAINST ADDITIONAL 100 BOAT SLIPS ADDED TO TEMPLINS RESORT ON SPOKANE RIVER INC., an Idaho nonprofit corporation.
- Pursuant to IDAPA 04.11.01.700 ("Intervention Generally"), I claim a direct and substantial interest in this proceeding concerning the River's Edge Apartments community dock application.
 - My interests are not adequately represented by any existing party to this proceeding.

DECLARATION: 1 OF 6

Property Interest

5.	My property interest in relation to the Spokane River is as follows (check all that
apply):	
Říver.	I own and reside on riparian (waterfront) property directly fronting the Spokane
	I reside near the Spokane River but do not own waterfront property.
	Uses of the Spokane River
6.	I use the Spokane River for the following purposes (check all that apply):
	Boating
	Fishing
	Kayaking
	Canoeing
\square	Paddleboarding
	Swimming
□⁄	Tubing
	Waterskiing / wakeboarding / wakesurfing
\triangleleft	Wildlife viewing / photography
□ ✓	Other:
	Relaxing on the dock

Substantial Interest

- The River's Edge Apartments community dock project will directly and substantially affect my interests.
- The project will increase boat traffic and congestion on this section of the Spokane
 River.
- Increased congestion will reduce safety for all users, including myself and my family.
 - The project will interfere with my ability to use and enjoy the Spokane River.
 - The project will increase risks of collision or injury to non-motorized users.
- Noise, wakes, and congestion will diminish the recreational value of this section of the river.
 - 13. Other impacts specific to me include:

boots	and	walces	Pro	duc	ed i	mpacts	00	~
ability	to	safely	be	on	our	dode	do	10

Adequacy of Representation

	14.	My interests	as a	property	owner	and/or	river	user	are not	adequately	represented
by any	existin	g party to this	pro	ceeding.							

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Verification

I declare under	penalty of perjury pursuant to the laws of the State of Idaho that the
foregoing is true and correct.	5432 E. Marma Ct.
DATED this 21 st	ay of August, 2025, at Post Falls, Idaho.
A	
	Laci M. Parish
	[Signature of Declarant]

DECLARATION: 4 OF 6

CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of August 2025, I cause to be served a true and correct copy of the foregoing document by the method indicated below, and addressed to the following:

Elizabeth A. Tellessen WINSTON & CASHATT, LAWYERS, P.S. 250 Northwest Boulevard, Suite 206 Coeur d'Alene, Idaho 83814 Telephone: (208) 667-2103 Facsimile: (208) 765-2121 Attorneys for River's Edge Apartments, LLC and Lanzce Douglass	☐ By U.S. Mail ☑ By Email eat@winstoncashatt.com
Lanzce Douglass 1402 E. Magnesium Rd. # 202 Spokane, WA 99217 (509) 951-4785 Applicant	☐ By U.S. Mail ■ By Email lanzce@lgdproperties.com
Cindy Richardson R&R Northwest 1857 W. Hayden Avenue, # 102 Hayden, ID 83835 (208) 818-6478 Agent for Applicant	☐ By U.S. Mail ☑ By Email cindy.richardson@rrnorthwest.com
Coeur d'Alene Land Company John F. Magnuson 1250 Northwood Center Court, Ste. A Coeur d'Alene, ID 83816 (208) 667-0500 Counsel for Objector CDA Land Co.	☐ By U.S. Mail ■ By Email john@magnusononline.com
Sheriff Robert B. Norris Kootenai County Sheriffs Office P.O. Box 9000 Coeur d'Alene, ID 83816 (208) 446-1300 Objector	☐ By U.S. Mail ■ By Email kcso@kcgov.us

DECLARATION: 5 OF 6

☐ By U.S. Mail
▼ By Email
jrichards@idl.idaho.gov
krichter@idl.idaho.gov
_
☐ By U.S. Mail
▼ By Email
afuson@idl.idaho.gov
mmensinger@idl.idaho.gov
☐ By U.S. Mail
▼ By Email
kromine@idl.idaho.gov
rking@idl.idaho.gov
kdawson@idl.idaho.gov
☐ By U.S. Mail
▼ By Email
filings@oah.idaho.gov
leslie.hayes@oah.idaho.gov

Carah Www.de

53062104.1

Peter J. Smith IV, ISB #6997 FENNEMORE CRAIG, P.C. 418 E. Lakeside, Suite 224 Coeur d'Alene, Idaho 83814

T: (208)

(208) 956-0145

E: peter.smith@fennemorelaw.com

Attorneys for Concerned Citizens Against Additional 100 Boat Slips Added to Templins Resort on Spokane River Inc.

BEFORE THE IDAHO DEPARTMENT OF LANDS

In the Matter of the Application for Encroachment L95S6163A, a Community Dock,

River's Edge Apartments, LLC; Lanzce Douglass,

Applicant.

AGENCY Case No. PH-2025-NAV-22-005 OAH Case No. 25-320-07

DECLARATION

- 1. I, Vonda Manley , am a citizen of the State of Idaho.
- I am involved with and/or am a member of CONCERNED CITIZENS AGAINST ADDITIONAL 100 BOAT SLIPS ADDED TO TEMPLINS RESORT ON SPOKANE RIVER INC., an Idaho nonprofit corporation.
- Pursuant to IDAPA 04.11.01.700 ("Intervention Generally"), I claim a direct and substantial interest in this proceeding concerning the River's Edge Apartments community dock application.
 - My interests are not adequately represented by any existing party to this proceeding.

DECLARATION: 1 OF 6

Property Interest

5.	My property interest in relation to the Spokane River is as follows (check all that
apply):	
River.	I own and reside on riparian (waterfront) property directly fronting the Spokane Butlding home in next Sew years
×	I reside near the Spokane River but do not own waterfront property. Currently reside in Mill River facing river Uses of the Spokane River
6.	I use the Spokane River for the following purposes (check all that apply):
X	Boating
	Fishing
×	Kayaking
	Canoeing
×	Paddleboarding
P	Swimming
	Tubing
	Waterskiing / wakeboarding / wakesurfing
	Wildlife viewing / photography
	Other:
-	
-	

DECLARATION: 2 OF 6

Substantial Interest

- The River's Edge Apartments community dock project will directly and substantially affect my interests.
- The project will increase boat traffic and congestion on this section of the Spokane
 River.
- Increased congestion will reduce safety for all users, including myself and my family.
 - The project will interfere with my ability to use and enjoy the Spokane River.
 - 11. The project will increase risks of collision or injury to non-motorized users.
- Noise, wakes, and congestion will diminish the recreational value of this section of the river.
 - 13. Other impacts specific to me include:

	witness		
	vee fel		

Adequacy of Representation

14.	My interests as a property owner and/or river user are not adequately represented
by any existi	ng party to this proceeding.

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Verification

15. I declare under penalty of perjury pursuant to the laws of the State of Idaho that the foregoing is true and correct.

DATED this 21 day of August, 2025, at Coeur d Alene, Idaho.

[Signature of Declarant]

, water

CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of August 2025, I cause to be served a true and correct copy of the foregoing document by the method indicated below, and addressed to the following:

Elizabeth A. Tellessen WINSTON & CASHATT, LAWYERS, P.S. 250 Northwest Boulevard, Suite 206 Coeur d'Alene, Idaho 83814 Telephone: (208) 667-2103 Facsimile: (208) 765-2121 Attorneys for River's Edge Apartments, LLC and Lanzce Douglass	☐ By U.S. Mail ☑ By Email eat@winstoncashatt.com
Lanzce Douglass 1402 E. Magnesium Rd. # 202 Spokane, WA 99217 (509) 951-4785 Applicant	☐ By U.S. Mail ■ By Email lanzce@lgdproperties.com
Cindy Richardson R&R Northwest 1857 W. Hayden Avenue, # 102 Hayden, ID 83835 (208) 818-6478 Agent for Applicant	☐ By U.S. Mail ☑ By Email cindy.richardson@rrnorthwest.com
Coeur d'Alene Land Company John F. Magnuson 1250 Northwood Center Court, Ste. A Coeur d'Alene, ID 83816 (208) 667-0500 Counsel for Objector CDA Land Co.	☐ By U.S. Mail ■ By Email john@magnusononline.com
Sheriff Robert B. Norris Kootenai County Sheriffs Office P.O. Box 9000 Coeur d'Alene, ID 83816 (208) 446-1300 Objector	☐ By U.S. Mail ■ By Email kcso@kcgov.us

DECLARATION: 5 OF 6

☐ By U.S. Mail
▼ By Email
jrichards@idl.idaho.gov
krichter@idl.idaho.gov
_
☐ By U.S. Mail
▼ By Email
afuson@idl.idaho.gov
mmensinger@idl.idaho.gov
☐ By U.S. Mail
▼ By Email
kromine@idl.idaho.gov
rking@idl.idaho.gov
kdawson@idl.idaho.gov
☐ By U.S. Mail
▼ By Email
filings@oah.idaho.gov
leslie.hayes@oah.idaho.gov

Carah Www.de

53062104.1

Peter J. Smith IV, ISB #6997 FENNEMORE CRAIG, P.C. 418 E. Lakeside, Suite 224 Coeur d'Alene, Idaho 83814

T: (208) 956-0145

E: peter.smith@fennemorelaw.com

Attorneys for Concerned Citizens Against Additional 100 Boat Slips Added to Templins Resort on Spokane River Inc.

BEFORE THE IDAHO DEPARTMENT OF LANDS

In the Matter of the Application for Encroachment L95S6163A, a Community Dock,

River's Edge Apartments, LLC; Lanzce Douglass,

Applicant.

AGENCY Case No. PH-2025-NAV-22-005 OAH Case No. 25-320-07

DECLARATION

- 1. I, William A. & Lova L. Nienau, am a citizen of the State of Idaho.
- 2. I am involved with and/or am a member of CONCERNED CITIZENS AGAINST ADDITIONAL 100 BOAT SLIPS ADDED TO TEMPLINS RESORT ON SPOKANE RIVER INC., an Idaho nonprofit corporation.
- 3. Pursuant to IDAPA 04.11.01.700 ("Intervention Generally"), I claim a direct and substantial interest in this proceeding concerning the River's Edge Apartments community dock application.
 - 4. My interests are not adequately represented by any existing party to this proceeding.

DECLARATION: 1 OF 6

Property Interest

	5.	My property interest in relation to the Spokane River is as follows (check all that
apply):	:	
		I own and reside on riparian (waterfront) property directly fronting the Spokane
River.		
		I reside near the Spokane River but do not own waterfront property.
		Uses of the Spokane River
	6.	I use the Spokane River for the following purposes (check all that apply):
		Boating
,	\times	Fishing
	*	Kayaking
	X	Canoeing
	×	Paddleboarding
^ /	X	Swimming
		Tubing
		Waterskiing / wakeboarding / wakesurfing
		Wildlife viewing / photography
		Other:
,î		
	-	

DECLARATION: 2 OF 6

Substantial Interest

	7.	The River's Edge Apartments community dock project will directly and
substa	ntially	affect my interests.
	8.	The project will increase boat traffic and congestion on this section of the Spokane
River.		
	9.	Increased congestion will reduce safety for all users, including myself and my
family	· .	
	10.	The project will interfere with my ability to use and enjoy the Spokane River.
	11.	The project will increase risks of collision or injury to non-motorized users.
	12.	Noise, wakes, and congestion will diminish the recreational value of this section of
the riv		roise, wakes, and congestion will diminish the recreational value of this section of
lile iiv		
	13.	Other impacts specific to me include:

		Adequacy of Representation
	14.	My interests as a property owner and/or river user are not adequately represented
by any	existin	ng party to this proceeding.
///		
///		
///		
/// ///		

DECLARATION: 3 OF 6

Verification

15	. I declare under penalty of perjury pursuant to the laws of the State of Idaho that the
• •	is true and correct. ATED this 21 st day of August, 2025, at <u>POST FAILS</u> , Idaho.
D.	ATED this 21 day of August, 2025, at 1037 19115, Idaho.
	[Signature of Declarant]
	William a Menan
	0 0

DECLARATION: 4 OF 6

CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of August 2025, I cause to be served a true and correct copy of the foregoing document by the method indicated below, and addressed to the following:

Elizabeth A. Tellessen WINSTON & CASHATT, LAWYERS, P.S. 250 Northwest Boulevard, Suite 206 Coeur d'Alene, Idaho 83814 Telephone: (208) 667-2103 Facsimile: (208) 765-2121 Attorneys for River's Edge Apartments, LLC and Lanzce Douglass	☐ By U.S. Mail ☑ By Email eat@winstoncashatt.com
Lanzce Douglass 1402 E. Magnesium Rd. # 202 Spokane, WA 99217 (509) 951-4785 Applicant	☐ By U.S. Mail ■ By Email lanzce@lgdproperties.com
Cindy Richardson R&R Northwest 1857 W. Hayden Avenue, # 102 Hayden, ID 83835 (208) 818-6478 Agent for Applicant	☐ By U.S. Mail ☑ By Email cindy.richardson@rrnorthwest.com
Coeur d'Alene Land Company John F. Magnuson 1250 Northwood Center Court, Ste. A Coeur d'Alene, ID 83816 (208) 667-0500 Counsel for Objector CDA Land Co.	☐ By U.S. Mail ■ By Email john@magnusononline.com
Sheriff Robert B. Norris Kootenai County Sheriffs Office P.O. Box 9000 Coeur d'Alene, ID 83816 (208) 446-1300 Objector	☐ By U.S. Mail ■ By Email kcso@kcgov.us

DECLARATION: 5 OF 6

☐ By U.S. Mail
▼ By Email
jrichards@idl.idaho.gov
krichter@idl.idaho.gov
_
☐ By U.S. Mail
▼ By Email
afuson@idl.idaho.gov
mmensinger@idl.idaho.gov
☐ By U.S. Mail
▼ By Email
kromine@idl.idaho.gov
rking@idl.idaho.gov
kdawson@idl.idaho.gov
☐ By U.S. Mail
■ By Email
filings@oah.idaho.gov
leslie.hayes@oah.idaho.gov

Carah Www.de

53062104.1

Peter J. Smith IV, ISB #6997 FENNEMORE CRAIG, P.C. 418 E. Lakeside, Suite 224 Coeur d'Alene, Idaho 83814

T: (208)

(208) 956-0145

E: peter.smith@fennemorelaw.com

Attorneys for Concerned Citizens Against Additional 100 Boat Slips Added to Templins Resort on Spokane River Inc.

BEFORE THE IDAHO DEPARTMENT OF LANDS

In the Matter of the Application for Encroachment L95S6163A, a Community Dock,

River's Edge Apartments, LLC; Lanzce Douglass,

Applicant.

AGENCY Case No. PH-2025-NAV-22-005

OAH Case No. 25-320-07

DECLARATION

- 1. I, William Harding, am a citizen of the State of Idaho.
- I am involved with and/or am a member of CONCERNED CITIZENS AGAINST ADDITIONAL 100 BOAT SLIPS ADDED TO TEMPLINS RESORT ON SPOKANE RIVER INC., an Idaho nonprofit corporation.
- 3. Pursuant to IDAPA 04.11.01.700 ("Intervention Generally"), I claim a direct and substantial interest in this proceeding concerning the River's Edge Apartments community dock application.
 - 4. My interests are not adequately represented by any existing party to this proceeding.

DECLARATION: 1 OF 6

Property Interest

	5.	My property interest in relation to the Spokane River is as follows (check all that
apply):	:	
	\square	I own and reside on riparian (waterfront) property directly fronting the Spokane
River.		
		I reside near the Spokane River but do not own waterfront property.
		Uses of the Spokane River
	6.	I use the Spokane River for the following purposes (check all that apply):
		Boating
		Fishing
		Kayaking
		Canoeing
		Paddleboarding
		Swimming
		Tubing
		Waterskiing / wakeboarding / wakesurfing
		Wildlife viewing / photography
		Other:

DECLARATION: 2 OF 6

Substantial Interest

	7.	The River's Edge Apartments community dock project will directly and
substai	ntially a	affect my interests.
	8.	The project will increase boat traffic and congestion on this section of the Spokane
River.		
	9.	Increased congestion will reduce safety for all users, including myself and my
family		
	10.	The project will interfere with my ability to use and enjoy the Spokane River.
	11.	The project will increase risks of collision or injury to non-motorized users.
	12.	Noise, wakes, and congestion will diminish the recreational value of this section of
the riv	er.	
	13.	Other impacts specific to me include:
		Adequacy of Representation
	14.	My interests as a property owner and/or river user are not adequately represented
by any	y existii	ng party to this proceeding.
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/// ///		

Verification

15. I declare under penalty of perjury pursuant to the laws of the State of Idaho that	the
foregoing is true and correct.	
DATED this 21 day of August, 2025, at 40ew d'Alene, Idaho.	
[Signature of Declarant]	

CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of August 2025, I cause to be served a true and correct copy of the foregoing document by the method indicated below, and addressed to the following:

Elizabeth A. Tellessen WINSTON & CASHATT, LAWYERS, P.S. 250 Northwest Boulevard, Suite 206 Coeur d'Alene, Idaho 83814 Telephone: (208) 667-2103 Facsimile: (208) 765-2121 Attorneys for River's Edge Apartments, LLC and Lanzce Douglass	☐ By U.S. Mail ☑ By Email eat@winstoncashatt.com
Lanzce Douglass 1402 E. Magnesium Rd. # 202 Spokane, WA 99217 (509) 951-4785 Applicant	☐ By U.S. Mail ■ By Email lanzce@lgdproperties.com
Cindy Richardson R&R Northwest 1857 W. Hayden Avenue, # 102 Hayden, ID 83835 (208) 818-6478 Agent for Applicant	☐ By U.S. Mail ☑ By Email cindy.richardson@rrnorthwest.com
Coeur d'Alene Land Company John F. Magnuson 1250 Northwood Center Court, Ste. A Coeur d'Alene, ID 83816 (208) 667-0500 Counsel for Objector CDA Land Co.	☐ By U.S. Mail ■ By Email john@magnusononline.com
Sheriff Robert B. Norris Kootenai County Sheriffs Office P.O. Box 9000 Coeur d'Alene, ID 83816 (208) 446-1300 Objector	☐ By U.S. Mail ■ By Email kcso@kcgov.us

DECLARATION: 5 OF 6

☐ By U.S. Mail
▼ By Email
jrichards@idl.idaho.gov
krichter@idl.idaho.gov
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☐ By U.S. Mail
▼ By Email
afuson@idl.idaho.gov
mmensinger@idl.idaho.gov
☐ By U.S. Mail
▼ By Email
kromine@idl.idaho.gov
rking@idl.idaho.gov
kdawson@idl.idaho.gov
☐ By U.S. Mail
■ By Email
filings@oah.idaho.gov
leslie.hayes@oah.idaho.gov

Carah Www.de

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