

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 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:

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 true and correct.

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

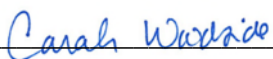
Barbara J. Gomez
[Signature of Declarant]

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 <i>Attorneys for River's Edge Apartments, LLC and Lanzce Douglass</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email eat@winstoncashatt.com
Lanzce Douglass 1402 E. Magnesium Rd. # 202 Spokane, WA 99217 (509) 951-4785 <i>Applicant</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email lanzce@lgdproperties.com
Cindy Richardson R&R Northwest 1857 W. Hayden Avenue, # 102 Hayden, ID 83835 (208) 818-6478 <i>Agent for Applicant</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email cindy.richardson@rnnorthwest.com
Coeur d'Alene Land Company John F. Magnuson 1250 Northwood Center Court, Ste. A Coeur d'Alene, ID 83816 (208) 667-0500 <i>Counsel for Objector CDA Land Co.</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> 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 <i>Objector</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email kcsso@kcgov.us

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


 Carah Woodside

53062104.1

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

OAH Case No. 25-320-07

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☐ 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:

Erosion 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 existing party to this proceeding.

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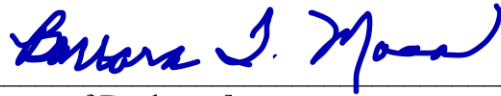
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Verification

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 19th day of August, 2025, at Coeur d'Alene, Idaho.



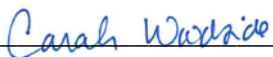
[Signature of Declarant]

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OAH General Government Division P.O. Box 83720 Boise, ID 83720-0104 (208) 605-4300	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email filings@oah.idaho.gov leslie.hayes@oah.idaho.gov


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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, C Thomas Hoag, 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
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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:

Sight seeing

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:

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

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 true and correct.

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

C Thomas Hoag

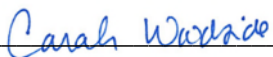
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Dock,

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.

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:

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 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 true and correct.

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

Cheryl Hollenback

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

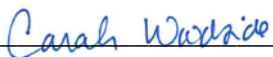
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OAH Case No. 25-320-07

DECLARATION

1. I, Craig T Sheppard, am a
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2. I am involved with and/or am a member of CONCERNED CITIZENS AGAINST
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☒ Wildlife viewing / photography

☐ Other:

Substantial Interest

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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:

Erosion of soil - chemicals harmful
to others and wildlife

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

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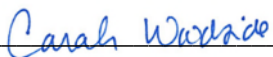
Craig T. Sheppard
[Signature of Declarant]

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 <i>Attorneys for River's Edge Apartments, LLC and Lanzce Douglass</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email eat@winstoncashatt.com
Lanzce Douglass 1402 E. Magnesium Rd. # 202 Spokane, WA 99217 (509) 951-4785 <i>Applicant</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email lanzce@lgdproperties.com
Cindy Richardson R&R Northwest 1857 W. Hayden Avenue, # 102 Hayden, ID 83835 (208) 818-6478 <i>Agent for Applicant</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email cindy.richardson@rnnorthwest.com
Coeur d'Alene Land Company John F. Magnuson 1250 Northwood Center Court, Ste. A Coeur d'Alene, ID 83816 (208) 667-0500 <i>Counsel for Objector CDA Land Co.</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> 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 <i>Objector</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email kcsso@kcgov.us

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


 Carah Woodside

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Peter J. Smith IV, ISB #6997
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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. I, Dale F James, 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:

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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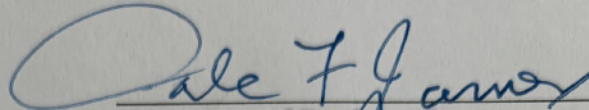
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Verification

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.

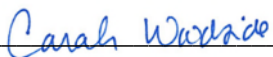

[Signature of Declarant]

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Kourtney Romine Rachel King Kayla Dawson <i>Service Contacts for IDL</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email kromine@idl.idaho.gov rking@idl.idaho.gov kdawson@idl.idaho.gov
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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.
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:

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 true and correct.

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

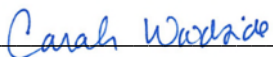

[Signature of Declarant]

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Lanzce Douglass 1402 E. Magnesium Rd. # 202 Spokane, WA 99217 (509) 951-4785 <i>Applicant</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email lanzce@lgdproperties.com
Cindy Richardson R&R Northwest 1857 W. Hayden Avenue, # 102 Hayden, ID 83835 (208) 818-6478 <i>Agent for Applicant</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email cindy.richardson@rnnorthwest.com
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Attorneys for Concerned Citizens Against Additional 100 Boat Slips Added to Templins Resort on Spokane River Inc.

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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, DAVID S. MAGBER, 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.

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Uses of the Spokane River

6. I use the Spokane River for the following purposes (check all that apply):

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☐ 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.

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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.

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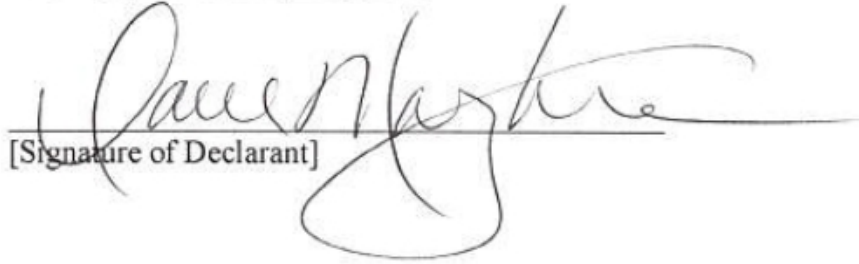
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Verification

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 POST FALLS, Idaho.

[Signature of Declarant]

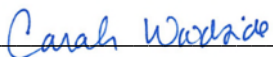


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Dock,

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, Clinton Allert, 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
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☐ Wildlife viewing / photography

☐ Other:

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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 River already has too many
boats to be safe for swimming
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.

/// Sheriff don't protect like he should.
/// unsafe for kids to swim.
///
///

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 ADA -, Idaho.

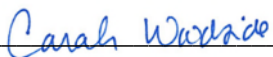

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AGENCY Case No. PH-2025-NAV-22-005

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DECLARATION

1. I, Darci Allert, 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:

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 true and correct.

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

Dan A. Allert

[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. By Email

250 Northwest Boulevard, Suite 206

Coeur d'Alene, Idaho 83814

eat@winstoncashatt.com

Telephone: (208) 667-2103

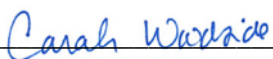
Facsimile: (208) 765-2121

CERTIFICATE OF SERVICE

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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 <i>Attorneys for River's Edge Apartments, LLC and Lanzce Douglass</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email eat@winstoncashatt.com
Lanzce Douglass 1402 E. Magnesium Rd. # 202 Spokane, WA 99217 (509) 951-4785 <i>Applicant</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email lanzce@lgdproperties.com
Cindy Richardson R&R Northwest 1857 W. Hayden Avenue, # 102 Hayden, ID 83835 (208) 818-6478 <i>Agent for Applicant</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email cindy.richardson@rnnorthwest.com
Coeur d'Alene Land Company John F. Magnuson 1250 Northwood Center Court, Ste. A Coeur d'Alene, ID 83816 (208) 667-0500 <i>Counsel for Objector CDA Land Co.</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> 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 <i>Objector</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email kcsso@kcgov.us

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


 Carah Woodside

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Peter J. Smith IV, ISB #6997
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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, Marc Allert, 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:

Excessive erosion of shoreline

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 true and correct.

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

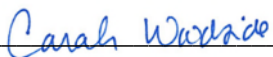
Marc Allert
[Signature of Declarant]

CERTIFICATE OF SERVICE

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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 <i>Attorneys for River's Edge Apartments, LLC and Lanzce Douglass</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email eat@winstoncashatt.com
Lanzce Douglass 1402 E. Magnesium Rd. # 202 Spokane, WA 99217 (509) 951-4785 <i>Applicant</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email lanzce@lgdproperties.com
Cindy Richardson R&R Northwest 1857 W. Hayden Avenue, # 102 Hayden, ID 83835 (208) 818-6478 <i>Agent for Applicant</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email cindy.richardson@rnnorthwest.com
Coeur d'Alene Land Company John F. Magnuson 1250 Northwood Center Court, Ste. A Coeur d'Alene, ID 83816 (208) 667-0500 <i>Counsel for Objector CDA Land Co.</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> 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 <i>Objector</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email kcsso@kcgov.us

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


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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 D. Allert, 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:

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 true and correct.

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


[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

eat@winstoncashatt.com

Telephone: (208) 667-2103

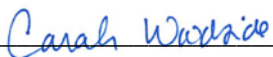
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Lanzce Douglass 1402 E. Magnesium Rd. # 202 Spokane, WA 99217 (509) 951-4785 <i>Applicant</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email lanzce@lgdproperties.com
Cindy Richardson R&R Northwest 1857 W. Hayden Avenue, # 102 Hayden, ID 83835 (208) 818-6478 <i>Agent for Applicant</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email cindy.richardson@rnnorthwest.com
Coeur d'Alene Land Company John F. Magnuson 1250 Northwood Center Court, Ste. A Coeur d'Alene, ID 83816 (208) 667-0500 <i>Counsel for Objector CDA Land Co.</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> 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 <i>Objector</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email kcsso@kcgov.us

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


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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, Diana J Sullivan, 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:

I believe my HOA fees for
Riverside Harbor will increase
due to erosion of beach land which
can cause more costs to homeowners

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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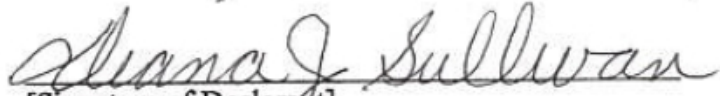
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Verification

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.

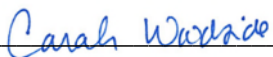

[Signature of Declarant]

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Lanzce Douglass 1402 E. Magnesium Rd. # 202 Spokane, WA 99217 (509) 951-4785 <i>Applicant</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email lanzce@lgdproperties.com
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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, Doug Hordcastle, 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):
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- ☐ 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:

Noise WAKE DAMAGE

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 true and correct.

DATED this 20 day of August, 2025, at 704 E. Packer Way ^{Pilot Falls} Idaho.

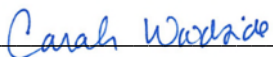
[Signature]
[Signature of Declarant]

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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 <i>Attorneys for River's Edge Apartments, LLC and Lanzce Douglass</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email eat@winstoncashatt.com
Lanzce Douglass 1402 E. Magnesium Rd. # 202 Spokane, WA 99217 (509) 951-4785 <i>Applicant</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email lanzce@lgdproperties.com
Cindy Richardson R&R Northwest 1857 W. Hayden Avenue, # 102 Hayden, ID 83835 (208) 818-6478 <i>Agent for Applicant</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email cindy.richardson@rnnorthwest.com
Coeur d'Alene Land Company John F. Magnuson 1250 Northwood Center Court, Ste. A Coeur d'Alene, ID 83816 (208) 667-0500 <i>Counsel for Objector CDA Land Co.</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> 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 <i>Objector</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email kcsso@kcgov.us

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


 Carah Woodside

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Peter J. Smith IV, ISB #6997

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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, DOYLE KING, 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:

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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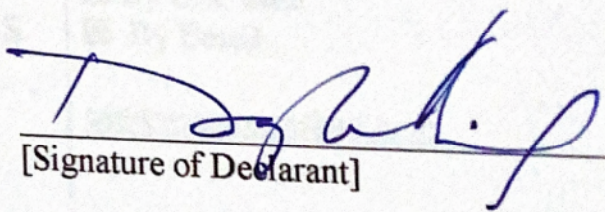
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Verification

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 Coeur d'Alene Idaho.

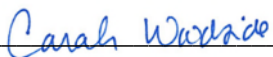

[Signature of Declarant]

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Amidy Fuson <i>Lands Resource Specialist-Navigable Waters</i> Marde Mensinger <i>Program Manager for Navigable Waters</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email afuson@idl.idaho.gov mmensinger@idl.idaho.gov
Kourtney Romine Rachel King Kayla Dawson <i>Service Contacts for IDL</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email kromine@idl.idaho.gov rking@idl.idaho.gov kdawson@idl.idaho.gov
OAH General Government Division P.O. Box 83720 Boise, ID 83720-0104 (208) 605-4300	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email filings@oah.idaho.gov leslie.hayes@oah.idaho.gov


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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. I, Eric 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:

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 true and correct.

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

Eric Hirst

Eric Hirst

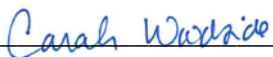
[Signature of Declarant]

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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 <i>Attorneys for River's Edge Apartments, LLC and Lanzce Douglass</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email eat@winstoncashatt.com
Lanzce Douglass 1402 E. Magnesium Rd. # 202 Spokane, WA 99217 (509) 951-4785 <i>Applicant</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email lanzce@lgdproperties.com
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 Carah Woodside

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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;
Lance Douglass.

Applicant.

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

OAH Case No. 25-320-07

DECLARATION

1. I, Erica Sheppard, 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:

Erosion of soil, with sediments
stirred in river, which may be
harmful to river users.

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 true and correct.

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

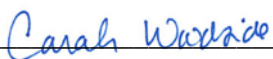
Eva Sheppard
[Signature of Declarant]

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BEFORE THE IDAHO DEPARTMENT OF LANDS

In the Matter of the Application for
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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 river
for its sustenance

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 true and correct.

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

Erin Hirst

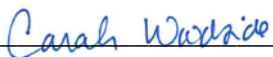
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Lanzce Douglass,

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):

☒ 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 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.

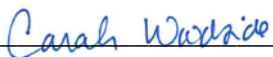

[Signature of Declarant]

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 <i>Attorneys for River's Edge Apartments, LLC and Lanzce Douglass</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email eat@winstoncashatt.com
Lanzce Douglass 1402 E. Magnesium Rd. # 202 Spokane, WA 99217 (509) 951-4785 <i>Applicant</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email lanzce@lgdproperties.com
Cindy Richardson R&R Northwest 1857 W. Hayden Avenue, # 102 Hayden, ID 83835 (208) 818-6478 <i>Agent for Applicant</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email cindy.richardson@rnnorthwest.com
Coeur d'Alene Land Company John F. Magnuson 1250 Northwood Center Court, Ste. A Coeur d'Alene, ID 83816 (208) 667-0500 <i>Counsel for Objector CDA Land Co.</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> 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 <i>Objector</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email kcsso@kcgov.us

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


 Carah Woodside

53062104.1

Peter J. Smith IV, ISB #6997
FENNEMORE CRAIG, P.C.
418 E. Lakeside, Suite 224
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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, Gina Magbee, 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:

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 true and correct.

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

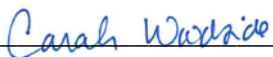
Ama Maghee
[Signature of Declarant]

CERTIFICATE OF SERVICE

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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 <i>Attorneys for River's Edge Apartments, LLC and Lanzce Douglass</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email eat@winstoncashatt.com
Lanzce Douglass 1402 E. Magnesium Rd. # 202 Spokane, WA 99217 (509) 951-4785 <i>Applicant</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email lanzce@lgdproperties.com
Cindy Richardson R&R Northwest 1857 W. Hayden Avenue, # 102 Hayden, ID 83835 (208) 818-6478 <i>Agent for Applicant</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email cindy.richardson@rnnorthwest.com
Coeur d'Alene Land Company John F. Magnuson 1250 Northwood Center Court, Ste. A Coeur d'Alene, ID 83816 (208) 667-0500 <i>Counsel for Objector CDA Land Co.</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> 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 <i>Objector</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email kcsso@kcgov.us

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


 Carah Woodside

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Peter J. Smith IV, ISB #6997
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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, JASON LUCAS, 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:

WORK VIA BARGE

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:

WILL HINDER AND ENDANGER
PROFESSIONAL INDUSTRIAL BOAT &
BARGE BASED WORK PROJECTS
FOR SHORE & WATER WORK.

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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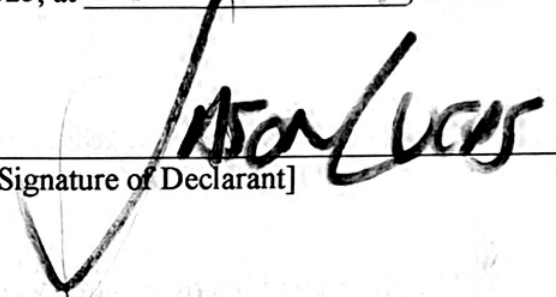
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Verification

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 RATHDRUM, Idaho.

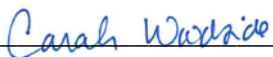

[Signature of Declarant]

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Lanzce Douglass 1402 E. Magnesium Rd. # 202 Spokane, WA 99217 (509) 951-4785 <i>Applicant</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email lanzce@lgdproperties.com
Cindy Richardson R&R Northwest 1857 W. Hayden Avenue, # 102 Hayden, ID 83835 (208) 818-6478 <i>Agent for Applicant</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email cindy.richardson@rnnorthwest.com
Coeur d'Alene Land Company John F. Magnuson 1250 Northwood Center Court, Ste. A Coeur d'Alene, ID 83816 (208) 667-0500 <i>Counsel for Objector CDA Land Co.</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> 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 <i>Objector</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email kcsso@kcgov.us

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


 Carah Woodside

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, Joseph V. Parrish, 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:

relaxing on my dock

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:

PERSONAL SAFETY when using my dock due to excessive wakes and dangerous conditions on the dock due to pitching and rolling

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 true and correct.

DATED this 21st day of August, 2025, at 5432 E. MARION CT Idaho.

POST HOLE!

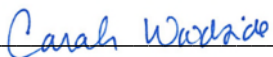
Joseph V. Beaul
[Signature of Declarant]

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Lanzce Douglass 1402 E. Magnesium Rd. # 202 Spokane, WA 99217 (509) 951-4785 <i>Applicant</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email lanzce@lgdproperties.com
Cindy Richardson R&R Northwest 1857 W. Hayden Avenue, # 102 Hayden, ID 83835 (208) 818-6478 <i>Agent for Applicant</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email cindy.richardson@rorthwest.com
Coeur d'Alene Land Company John F. Magnuson 1250 Northwood Center Court, Ste. A Coeur d'Alene, ID 83816 (208) 667-0500 <i>Counsel for Objector CDA Land Co.</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> 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 <i>Objector</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email kcsso@kcgov.us

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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, Joshua Sheppard, 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
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application.

4. My interests are not adequately represented by any existing party to this proceeding.

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☒ Kayaking

☐ Canoeing

☒ Paddleboarding

☒ Swimming

☐ Tubing

☐ Waterskiing / wakeboarding / wakesurfing

☒ Wildlife viewing / photography

☐ Other:

Substantial Interest

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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:

Damage to river banks and wildlife
areas such as grassland and forested
area erosion.

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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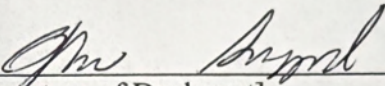
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Verification

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 Falls, Idaho.

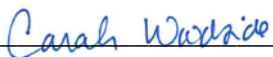

[Signature of Declarant]

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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 <i>Attorneys for River's Edge Apartments, LLC and Lanzce Douglass</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email eat@winstoncashatt.com
Lanzce Douglass 1402 E. Magnesium Rd. # 202 Spokane, WA 99217 (509) 951-4785 <i>Applicant</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email lanzce@lgdproperties.com
Cindy Richardson R&R Northwest 1857 W. Hayden Avenue, # 102 Hayden, ID 83835 (208) 818-6478 <i>Agent for Applicant</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email cindy.richardson@rnnorthwest.com
Coeur d'Alene Land Company John F. Magnuson 1250 Northwood Center Court, Ste. A Coeur d'Alene, ID 83816 (208) 667-0500 <i>Counsel for Objector CDA Land Co.</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> 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 <i>Objector</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email kcsso@kcgov.us

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


 Carah Woodside

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Peter J. Smith IV, ISB #6997
FENNEMORE CRAIG, P.C.
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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, Linda Hardcastle, 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:

We had to put a boat lift
to keep our boat safe from the large waves

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 true and correct.

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

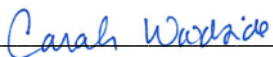
L. Q. Henderson
[Signature of Declarant]

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 <i>Attorneys for River's Edge Apartments, LLC and Lanzce Douglass</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email eat@winstoncashatt.com
Lanzce Douglass 1402 E. Magnesium Rd. # 202 Spokane, WA 99217 (509) 951-4785 <i>Applicant</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email lanzce@lgdproperties.com
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Amidy Fuson <i>Lands Resource Specialist-Navigable Waters</i> Marde Mensinger <i>Program Manager for Navigable Waters</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email afuson@idl.idaho.gov mmensinger@idl.idaho.gov
Kourtney Romine Rachel King Kayla Dawson <i>Service Contacts for IDL</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email kromine@idl.idaho.gov rking@idl.idaho.gov kdawson@idl.idaho.gov
OAH General Government Division P.O. Box 83720 Boise, ID 83720-0104 (208) 605-4300	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email filings@oah.idaho.gov leslie.hayes@oah.idaho.gov


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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. 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.

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:

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 true and correct.

DATED this 21st day of August, 2025, at COEUR D'ALENE Idaho.

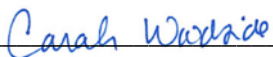

[Signature of Declarant]

CERTIFICATE OF SERVICE

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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 <i>Attorneys for River's Edge Apartments, LLC and Lanzce Douglass</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email eat@winstoncashatt.com
Lanzce Douglass 1402 E. Magnesium Rd. # 202 Spokane, WA 99217 (509) 951-4785 <i>Applicant</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email lanzce@lgdproperties.com
Cindy Richardson R&R Northwest 1857 W. Hayden Avenue, # 102 Hayden, ID 83835 (208) 818-6478 <i>Agent for Applicant</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email cindy.richardson@rnnorthwest.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 <i>Objector</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email kcsso@kcgov.us

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OAH General Government Division P.O. Box 83720 Boise, ID 83720-0104 (208) 605-4300	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email filings@oah.idaho.gov leslie.hayes@oah.idaho.gov


 Carah Woodside

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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, Mary K York, 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:

Keeping or Improving the health of the river
for us and the wildlife that use the river
for their survival.

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 true and correct.

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

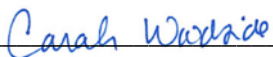
Mary R York
[Signature of Declarant]

CERTIFICATE OF SERVICE

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Lanzce Douglass 1402 E. Magnesium Rd. # 202 Spokane, WA 99217 (509) 951-4785 <i>Applicant</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email lanzce@lgdproperties.com
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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.

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:

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 true and correct.

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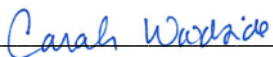
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River's Edge Apartments, LLC;
Lanzce Douglass,

Applicant.

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

OAH Case No. 25-320-07

DECLARATION

1. I, Michael K 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
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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:

Erosion of shoreline

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 true and correct.

DATED this 19th day of August, 2025, at Coeur d'Alene, Idaho.



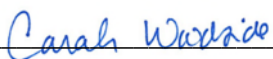
[Signature of Declarant]

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 <i>Attorneys for River's Edge Apartments, LLC and Lanzce Douglass</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email eat@winstoncashatt.com
Lanzce Douglass 1402 E. Magnesium Rd. # 202 Spokane, WA 99217 (509) 951-4785 <i>Applicant</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email lanzce@lgdproperties.com
Cindy Richardson R&R Northwest 1857 W. Hayden Avenue, # 102 Hayden, ID 83835 (208) 818-6478 <i>Agent for Applicant</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email cindy.richardson@rnnorthwest.com
Coeur d'Alene Land Company John F. Magnuson 1250 Northwood Center Court, Ste. A Coeur d'Alene, ID 83816 (208) 667-0500 <i>Counsel for Objector CDA Land Co.</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> 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 <i>Objector</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email kcsso@kcgov.us

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


 Carah Woodside

53062104.1

Peter J. Smith IV, ISB #6997
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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. 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.

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 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.

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

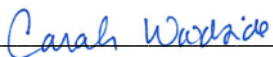
[Signature of Declarant] _____

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Amidy Fuson <i>Lands Resource Specialist-Navigable Waters</i> Marde Mensinger <i>Program Manager for Navigable Waters</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email afuson@idl.idaho.gov mmensinger@idl.idaho.gov
Kourtney Romine Rachel King Kayla Dawson <i>Service Contacts for IDL</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email kromine@idl.idaho.gov rking@idl.idaho.gov kdawson@idl.idaho.gov
OAH General Government Division P.O. Box 83720 Boise, ID 83720-0104 (208) 605-4300	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email filings@oah.idaho.gov leslie.hayes@oah.idaho.gov


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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. 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 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:

___Erosion _____ of
shoreline _____

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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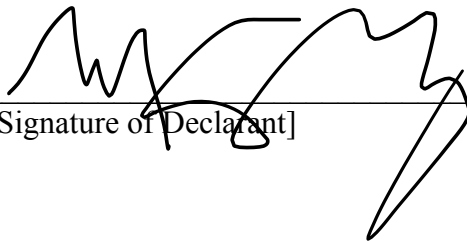
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Verification

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 __Post Falls_____,
Idaho.

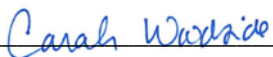

[Signature of Declarant]

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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 <i>Attorneys for River's Edge Apartments, LLC and Lanzce Douglass</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email eat@winstoncashatt.com
Lanzce Douglass 1402 E. Magnesium Rd. # 202 Spokane, WA 99217 (509) 951-4785 <i>Applicant</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email lanzce@lgdproperties.com
Cindy Richardson R&R Northwest 1857 W. Hayden Avenue, # 102 Hayden, ID 83835 (208) 818-6478 <i>Agent for Applicant</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email cindy.richardson@rnnorthwest.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 <i>Objector</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email kcsso@kcgov.us

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Amidy Fuson <i>Lands Resource Specialist-Navigable Waters</i> Marde Mensinger <i>Program Manager for Navigable Waters</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email afuson@idl.idaho.gov mmensinger@idl.idaho.gov
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OAH General Government Division P.O. Box 83720 Boise, ID 83720-0104 (208) 605-4300	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email filings@oah.idaho.gov leslie.hayes@oah.idaho.gov


 Carah Woodside

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Peter J. Smith IV, ISB #6997
FENNEMORE CRAIG, P.C.
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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, Paula 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 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:

___Erosion _____ of
shoreline _____

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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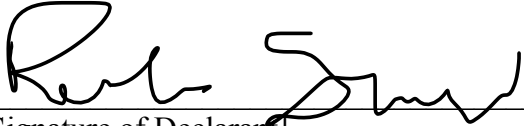
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Verification

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 Post Falls,
Idaho.

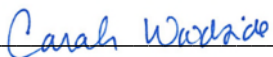

[Signature of Declarant]

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Lanzce Douglass 1402 E. Magnesium Rd. # 202 Spokane, WA 99217 (509) 951-4785 <i>Applicant</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email lanzce@lgdproperties.com
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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, 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.

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. 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):

☒ Boating

☒ Fishing

☐ Kayaking

☐ Canoeing

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☒ Wildlife viewing / photography

☐ Other:

Substantial Interest

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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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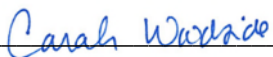
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Sheriff Robert B. Norris Kootenai County Sheriffs Office P.O. Box 9000 Coeur d'Alene, ID 83816 (208) 446-1300 <i>Objector</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email kcsso@kcgov.us

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


 Carah Woodside

53062104.1

Peter J. Smith IV, ISB #6997
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418 E. Lakeside, Suite 224
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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.



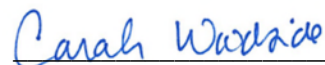
PETER J. SMITH IV, ISB #6997
Attorney for Concerned Citizens

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 <i>Attorneys for River's Edge Apartments, LLC and Lanzce Douglass</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email eat@winstoncashatt.com
Lanzce Douglass 1402 E. Magnesium Rd. # 202 Spokane, WA 99217 (509) 951-4785 <i>Applicant</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email lanzce@lgdproperties.com
Cindy Richardson R&R Northwest 1857 W. Hayden Avenue, # 102 Hayden, ID 83835 (208) 818-6478 <i>Agent for Applicant</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email cindy.richardson@rnnorthwest.com
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Amidy Fuson <i>Lands Resource Specialist-Navigable Waters</i> Marde Mensinger <i>Program Manager for Navigable Waters</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email afuson@idl.idaho.gov mmensinger@idl.idaho.gov
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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. I, Randy Lewis, 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:

There are presently too 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 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 true and correct.

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

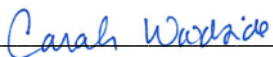

[Signature of Declarant]

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Lanzce Douglass 1402 E. Magnesium Rd. # 202 Spokane, WA 99217 (509) 951-4785 <i>Applicant</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email lanzce@lgdproperties.com
Cindy Richardson R&R Northwest 1857 W. Hayden Avenue, # 102 Hayden, ID 83835 (208) 818-6478 <i>Agent for Applicant</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email cindy.richardson@rnnorthwest.com
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Kourtney Romine Rachel King Kayla Dawson <i>Service Contacts for IDL</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email kromine@idl.idaho.gov rking@idl.idaho.gov kdawson@idl.idaho.gov
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 Carah Woodside

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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. I, Rebecca Frost, 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:

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 true and correct.

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

A handwritten signature in blue ink, appearing to read "Rebecca", is written over a horizontal line.

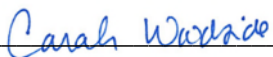
[Signature of Declarant]

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Lanzce Douglass 1402 E. Magnesium Rd. # 202 Spokane, WA 99217 (509) 951-4785 <i>Applicant</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email lanzce@lgdproperties.com
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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, Richard Teich _____,
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:

__Safety of my Children, Grandchildren and Greatgrandchildren_____

__Further degradate an already fragile river_____

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 true and correct.

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

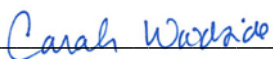
A handwritten signature in black ink, appearing to read "R. J. Smith", is written over a horizontal line. Below the line, the text "[Signature of Declarant]" is printed.

CERTIFICATE OF SERVICE

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Lanzce Douglass,

Applicant.

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

OAH Case No. 25-320-07

DECLARATION

1. I, Scott Scofield, 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
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application.

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6. I use the Spokane River for the following purposes (check all that apply):

☒ Boating

☒ Fishing

☒ Kayaking

☒ Canoeing

☒ Paddleboarding

☒ Swimming

☐ Tubing - I go to lake

☒ 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.

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13. Other impacts specific to me include:

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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 true and correct.

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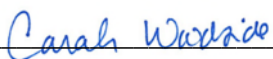
[Signature of Declarant]

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 <i>Attorneys for River's Edge Apartments, LLC and Lanzce Douglass</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email eat@winstoncashatt.com
Lanzce Douglass 1402 E. Magnesium Rd. # 202 Spokane, WA 99217 (509) 951-4785 <i>Applicant</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email lanzce@lgdproperties.com
Cindy Richardson R&R Northwest 1857 W. Hayden Avenue, # 102 Hayden, ID 83835 (208) 818-6478 <i>Agent for Applicant</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email cindy.richardson@rnnorthwest.com
Coeur d'Alene Land Company John F. Magnuson 1250 Northwood Center Court, Ste. A Coeur d'Alene, ID 83816 (208) 667-0500 <i>Counsel for Objector CDA Land Co.</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> 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 <i>Objector</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email kcsso@kcgov.us

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


 Carah Woodside

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Peter J. Smith IV, ISB #6997
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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. I, Sheryl Scofield, 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 (I go on the lake)

☐ 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:

possibly will increase my taxes when the city/county
has to mitigate the erosion damage of allowing
221+ additional boatslips on the Spokane River.
What % of these will be more wake surf boats?

Adequacy of Representation

70%? 80%? 90%?
100%?

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 true and correct.

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

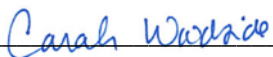

[Signature of Declarant]

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OAH General Government Division P.O. Box 83720 Boise, ID 83720-0104 (208) 605-4300	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email filings@oah.idaho.gov leslie.hayes@oah.idaho.gov


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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. I, STEVEN SALHUS, 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:

PHOTOGRAPHY, FAMILY EVENTS, CHURCH
EVENTS, ETC. ALWAYS USING THE
RIVERS & LAKES, ESPECIALLY, SPOKANE 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 SWIMMING IN RIVER, TOO MANY
PEOPLE ALREADY, NARROW RIVER WITH BOATS
& SEADOO'S COMING CLOSE TO SWIM AREAS,
ENVIRONMENTAL CONCERNS WITH FUEL/OIL IN RIVER
FROM BOATS. ADD DOCKS = MORE BOATS =
poor water quality.

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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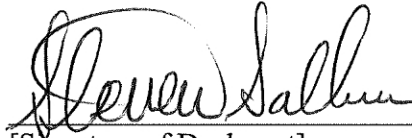
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Verification

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 POST FALLS, Idaho.

A handwritten signature in black ink, appearing to read "Steven Salhu", written over a horizontal line.

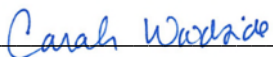
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Lanzce Douglass 1402 E. Magnesium Rd. # 202 Spokane, WA 99217 (509) 951-4785 <i>Applicant</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email lanzce@lgdproperties.com
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Amidy Fuson <i>Lands Resource Specialist-Navigable Waters</i> Marde Mensinger <i>Program Manager for Navigable Waters</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email afuson@idl.idaho.gov mmensinger@idl.idaho.gov
Kourtney Romine Rachel King Kayla Dawson <i>Service Contacts for IDL</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email kromine@idl.idaho.gov rking@idl.idaho.gov kdawson@idl.idaho.gov
OAH General Government Division P.O. Box 83720 Boise, ID 83720-0104 (208) 605-4300	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email filings@oah.idaho.gov leslie.hayes@oah.idaho.gov


 Carah Woodside

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Peter J. Smith IV, ISB #6997
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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. I, Susan B. Loughlin, 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:

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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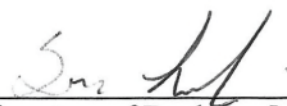
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Verification

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 POST FALLS, Idaho.



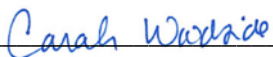
[Signature of Declarant]

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Lanzce Douglass 1402 E. Magnesium Rd. # 202 Spokane, WA 99217 (509) 951-4785 <i>Applicant</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email lanzce@lgdproperties.com
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Lanzce Douglass,

Applicant.

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

OAH Case No. 25-320-07

DECLARATION

1. I, Terese Teich, 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:

Inability to safely use the river by
myself, children, grandchildren
& great-grandchildren

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 true and correct.

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

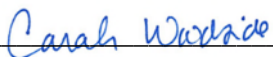
Amanda Peck
[Signature of Declarant]

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Amidy Fuson <i>Lands Resource Specialist-Navigable Waters</i> Marde Mensinger <i>Program Manager for Navigable Waters</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email afuson@idl.idaho.gov mmensinger@idl.idaho.gov
Kourtney Romine Rachel King Kayla Dawson <i>Service Contacts for IDL</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email kromine@idl.idaho.gov rking@idl.idaho.gov kdawson@idl.idaho.gov
OAH General Government Division P.O. Box 83720 Boise, ID 83720-0104 (208) 605-4300	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email filings@oah.idaho.gov leslie.hayes@oah.idaho.gov


 Carah Woodside

53062104.1

Peter J. Smith IV, ISB #6997
FENNEMORE CRAIG, P.C.
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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 Shields, am a
citizen of the State of Washington.

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:

Pollution of the river when people use
the river as a toilet.

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 true and correct.

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

Rene Shields

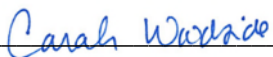
[Signature of Declarant]

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 <i>Attorneys for River's Edge Apartments, LLC and Lanzce Douglass</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email eat@winstoncashatt.com
Lanzce Douglass 1402 E. Magnesium Rd. # 202 Spokane, WA 99217 (509) 951-4785 <i>Applicant</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email lanzce@lgdproperties.com
Cindy Richardson R&R Northwest 1857 W. Hayden Avenue, # 102 Hayden, ID 83835 (208) 818-6478 <i>Agent for Applicant</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email cindy.richardson@rnnorthwest.com
Coeur d'Alene Land Company John F. Magnuson 1250 Northwood Center Court, Ste. A Coeur d'Alene, ID 83816 (208) 667-0500 <i>Counsel for Objector CDA Land Co.</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> 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 <i>Objector</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email kcsso@kcgov.us

Idaho Department of Lands John Richards, General Counsel Kayleen Richter, Counsel 300 N. 6th Street, Ste. 103 Boise, ID 83702 (208) 334-0200 <i>Counsel for IDL</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email jrichards@idl.idaho.gov krichter@idl.idaho.gov
Amidy Fuson <i>Lands Resource Specialist-Navigable Waters</i> Marde Mensinger <i>Program Manager for Navigable Waters</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email afuson@idl.idaho.gov mmensinger@idl.idaho.gov
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 Carah Woodside

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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, Traci M. Parrish, 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:

Relaxing on the (my) dock

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:

excessive wakes from both volume of
boats and wakes produced impacts our
ability to safely be on our dock do to
pitching and rolling.

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 true and correct.

5432 E. Marina Ct.

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

Laci M. Parrish

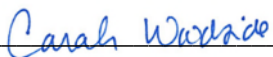
[Signature of Declarant]

CERTIFICATE OF SERVICE

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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 <i>Attorneys for River's Edge Apartments, LLC and Lanzce Douglass</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email eat@winstoncashatt.com
Lanzce Douglass 1402 E. Magnesium Rd. # 202 Spokane, WA 99217 (509) 951-4785 <i>Applicant</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email lanzce@lgdproperties.com
Cindy Richardson R&R Northwest 1857 W. Hayden Avenue, # 102 Hayden, ID 83835 (208) 818-6478 <i>Agent for Applicant</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email cindy.richardson@rnnorthwest.com
Coeur d'Alene Land Company John F. Magnuson 1250 Northwood Center Court, Ste. A Coeur d'Alene, ID 83816 (208) 667-0500 <i>Counsel for Objector CDA Land Co.</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> 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 <i>Objector</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email kcsso@kcgov.us

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


 Carah Woodside

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Peter J. Smith IV, ISB #6997
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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, Vonda Manley, 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. *Building home in next few 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):

☒ 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:

I have witnessed the erosion of
the river bank and saw one perfectly
healthy tree fall over into the river.

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 true and correct.

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

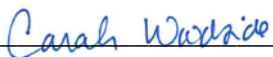
Vonda Manley
[Signature of Declarant]

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 <i>Attorneys for River's Edge Apartments, LLC and Lanzce Douglass</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email eat@winstoncashatt.com
Lanzce Douglass 1402 E. Magnesium Rd. # 202 Spokane, WA 99217 (509) 951-4785 <i>Applicant</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email lanzce@lgdproperties.com
Cindy Richardson R&R Northwest 1857 W. Hayden Avenue, # 102 Hayden, ID 83835 (208) 818-6478 <i>Agent for Applicant</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email cindy.richardson@rnnorthwest.com
Coeur d'Alene Land Company John F. Magnuson 1250 Northwood Center Court, Ste. A Coeur d'Alene, ID 83816 (208) 667-0500 <i>Counsel for Objector CDA Land Co.</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> 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 <i>Objector</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email kcsso@kcgov.us

Idaho Department of Lands John Richards, General Counsel Kayleen Richter, Counsel 300 N. 6th Street, Ste. 103 Boise, ID 83702 (208) 334-0200 <i>Counsel for IDL</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email jrichards@idl.idaho.gov krichter@idl.idaho.gov
Amidy Fuson <i>Lands Resource Specialist-Navigable Waters</i> Marde Mensinger <i>Program Manager for Navigable Waters</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email afuson@idl.idaho.gov mmensinger@idl.idaho.gov
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OAH General Government Division P.O. Box 83720 Boise, ID 83720-0104 (208) 605-4300	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email filings@oah.idaho.gov leslie.hayes@oah.idaho.gov


 Carah Woodside

53062104.1

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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. & Lora 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.

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:

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 true and correct.

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

Lora L. Menari
[Signature of Declarant]

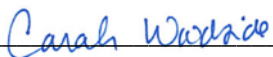
William C. Menari

CERTIFICATE OF SERVICE

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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 <i>Attorneys for River's Edge Apartments, LLC and Lanzce Douglass</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email eat@winstoncashatt.com
Lanzce Douglass 1402 E. Magnesium Rd. # 202 Spokane, WA 99217 (509) 951-4785 <i>Applicant</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email lanzce@lgdproperties.com
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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, William 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.

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:

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 true and correct.

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

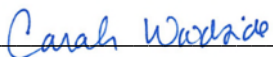

[Signature of Declarant]

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 <i>Attorneys for River's Edge Apartments, LLC and Lanzce Douglass</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email eat@winstoncashatt.com
Lanzce Douglass 1402 E. Magnesium Rd. # 202 Spokane, WA 99217 (509) 951-4785 <i>Applicant</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email lanzce@lgdproperties.com
Cindy Richardson R&R Northwest 1857 W. Hayden Avenue, # 102 Hayden, ID 83835 (208) 818-6478 <i>Agent for Applicant</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email cindy.richardson@rnnorthwest.com
Coeur d'Alene Land Company John F. Magnuson 1250 Northwood Center Court, Ste. A Coeur d'Alene, ID 83816 (208) 667-0500 <i>Counsel for Objector CDA Land Co.</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> 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 <i>Objector</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email kcsso@kcgov.us

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