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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

Application for Permit to Install a Community
Dock, Encroachment L95S6181,

The Estates at Waterstone HOA, Inc., Jason
Garvey (Agent),

Applicant.

AGENCY Case No. PH-2025-NAV-22-0006

OAH Case No. 25-320-08

**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 5th day of September 2025.

FENNEMORE CRAIG, P.C.

A handwritten signature in blue ink, appearing to read "PJS IV", is positioned above a horizontal line.

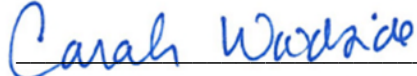
PETER J. SMITH IV, ISB #6997
Attorney for Concerned Citizens

CERTIFICATE OF SERVICE

I hereby certify that on the 5th day of September, 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:

The Estates at Waterstone HOA, Inc. Jason Garvey, Agent 1386 Northwest Blvd Coeur d'Alene, ID 83814 (208) 916-3647 <i>Agent for Applicant</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email jason@wesslen.com caseym@legacylw.com
Nathan S. Ohler Ohler Bean & Tinkey 1809 E. Sherman Ave., Ste. 101 Coeur d'Alene, ID 83814 (208) 444-8686 <i>Attorneys for Applicant</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email nathan@ohlerbean.com
Idaho Department of Lands John Richards, General Counsel Kayleen Richter, Counsel 300 N. 6 th Street, Ste. 103 Boise, ID 83702 (208) 334-0200 <i>Counsel for Idaho Department of Lands</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email jrichards@idl.idaho.gov krichter@idl.idaho.gov
Marde Mensinger <i>Program Manager for Navigable Waters</i>	<input type="checkbox"/> By U.S. Mail <input checked="" type="checkbox"/> By Email mmensinger@idl.idaho.gov
Kourtney Romine Rachel King Kayla Dawson <i>Service Contacts for Idaho Department of Lands</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

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