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**

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

1. I, SHARON M. GOLDWALD, 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:

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_____

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**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 collisions 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:

Dangerous boating practices and damage to my boat and dock.

**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 2nd 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:

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

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

Carah Woodside

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