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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.

Jose Jara

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

OAH Case No. 25-320-07

DECLARATION

Jose Jara

1. I, _____, am a
citizen of the State of Idaho.

2. I am involved with and/or am a member of CONCERNED CITIZENS AGAINST
ADDITIONAL 100 BOAT SLIPS ADDED TO TEMPLINS RESORT ON SPOKANE RIVER
INC., an Idaho nonprofit corporation.

3. Pursuant to IDAPA 04.11.01.700 ("Intervention Generally"), I claim a direct and
substantial interest in this proceeding concerning the River's Edge Apartments community dock
application.

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

Property Interest

5. My 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 black ink, consisting of several overlapping loops and a final horizontal stroke.

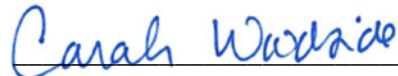
[Signature of Declarant]

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 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@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

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
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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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