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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

**CONCERNED CITIZENS WITNESS
AND EXHIBIT LIST**

COMES NOW Concerned Citizens Against Additional 100 Boat Slips, by and through
undersigned counsel, and files this witness and exhibit list.

Name	Address	Telephone Number	Nature of Testimony
Sheri Scofield	11927 W Span Way Post Falls, ID 838854	208-964-4037	See below
Scot Scofield	11927 W Span Way Post Falls, ID 838854	209-321-0975	See below
Jose Jara	325 S Simonsen Road Post Falls, ID 83854	909-648-2435	See below
Doug Parker		208-661-0322	See below
Vic Parrish	5432 E Marina Court Post Falls, ID 83854		See below

The anticipated testimony of residents and property owners will focus on the detrimental impacts of additional boat traffic. They are expected to testify that more boats from the proposed docks will accelerate shoreline erosion and damage existing docks. They will further explain that navigation and recreation are already strained during crowded summer weekends and would be significantly impaired by additional vessels. Finally, they are expected to testify that increased boat activity will elevate turbidity levels, thereby harming fish and wildlife habitat, aquatic life, water quality, and the scenic character of the river.

Exhibit No.	Description
INT-1	Video of river: https://www.reddit.com/r/SpokaneRiver/comments/1mwgibl/more_boat_slips/?utm_source=share&utm_medium=web3x&utm_name=web3xcss&utm_term=1&utm_content=share_button
INT-2	Photo of Shoreline
INT-3	Photo of Shoreline
INT-4	Photo of Shoreline
INT-5	Photo of Shoreline
INT-6	Box link containing 12 videos https://fclaw.box.com/s/qmpndemdpvfyrlydleafw2uog6m09j2

DATED this 5th day of September 2025.

FENNEMORE CRAIG, P.C.



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



INT - 2



INT - 3



INT - 4



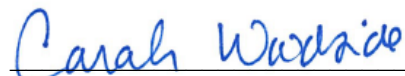
INT - 5

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:

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@rrnorthwest.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 elaine.maneck@oah.idaho.gov


Carah Woodside