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*Attorneys for Idaho Department of Lands, Navigable Waterways Program*

**BEFORE THE STATE BOARD OF LAND COMMISSIONERS  
STATE OF IDAHO**

IN THE MATTER OF

Encroachment Permit Application  
No. L95S6163A

River's Edge Apartments, LLC,  
Lanzce Douglass,

Applicant.

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

OAH Case No. 25-320-07

**IDAHO DEPARTMENT OF LANDS'  
WITNESS AND EXHIBIT LIST**

The Idaho Department of Lands ("IDL"), by and through its counsel of record Kayleen Richter, submits the following Witness and Exhibit List in accordance with the *Scheduling Order* issued August 20, 2025. The following Exhibit List is intended to mirror the unofficial agency record posted online at <https://www.idl.idaho.gov/lakes-rivers/administrative-hearings/rivers-edge-apartments-llc/>. The website is updated on a continuous basis and will include any additional public comments that may be received.

**I. WITNESSES**

IDL is a neutral participant in this proceeding and does not intend to call any witnesses. IDL's prehearing statement summarizes the current record and highlights relevant facts included therein for ease of consideration by the Hearing Officer, the public, and the IDL Director. IDL reserves the right to call any witness that has been or will be identified or called by any other

party, or any other witness participating in the above captioned matter, and to cross-examine any party to this matter or any non-party witness called to testify during the public hearing. IDL reserves the right to amend or supplement this list in advance of hearing.

## **II. EXHIBITS**

IDL may present the following exhibits in this matter:

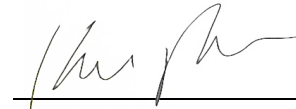
- **IDL-1** – OAH Transmittal Sheet
- **IDL-2** – Application L-95-S-6163A
- **IDL-3** – Comments from Kootenai County Sheriff
- **IDL-4** – Request for Public Notice, Coeur d’Alene Press
- **IDL-5** – Notice of Application to Neighbors
- **IDL-6** – Notice of Application to Agencies
- **IDL-7** – Legal Notice of Application Order Confirmation
- **IDL-8** – Objection to Application from John Magnuson, Coeur d’Alene Land Company
- **IDL-9** – Objection to Application from Kootenai County Sheriff
- **IDL-10** – Notice of Appointment of Hearing Officer
- **IDL-11** – Notice of Scheduling Conference
- **IDL-12** – Notice of Errata to Correct Case Numbers
- **IDL-13** – Comments, PC 0001-47
- **IDL-14** – Comments, PC 0048-68
- **IDL-15** – Notice of Appearance, Applicant
- **IDL-16** – Scheduling Order
- **IDL-17** – Comments, PC0069-70
- **IDL-18** – Petition to Intervene from Boardwalk & Docks LLC and Residences on the Spokane River LLC
- **IDL-19** – Petition to Intervene from Concerned Citizens Against Additional 100 Boat Slips Added to Templins Resort on Spokane River, Inc.
- **IDL-20** – Memorandum in Support of Petition to Intervene from Concerned Citizens Against Additional 100 Boat Slips Added to Templins Resort on Spokane River, Inc.
- **IDL-21** – Declarations in Support of Petition to Intervene from Concerned Citizens Against Additional 100 Boat Slips Added to Templins Resort on Spokane River, Inc.

- **IDL-22** – Objection to Application from Mill River Property Owner’s Association
- **IDL-23** – Objection to Application from Concerned Citizens Against Additional 100 Boat Slips Added to Templins Resort on Spokane River, Inc.
- **IDL-24** – Petition to Intervene from Coeur d’Alene Land Company
- **IDL-25** – Notice of Hearing Location
- **IDL-26** – Declaration of Sharon Grunwald
- **IDL-27** – Declaration of Jose Jara
- **IDL-28** – Declaration of Mary Linton
- **IDL-29** – Declaration of Dirk Linton
- **IDL-30** – Comments (Scofield, Nienau, King, Grunwald)
- **IDL-31** – Opposition to Petition to Intervene by Coeur d’Alene Land Company
- **IDL-32** – Comments, Mary Lee Linton
- **IDL-33** – Legal Notice of Public Hearing Order Confirmation

Copies of the identified exhibits are submitted concurrently with this Witness and Exhibit List. IDL reserves the right to utilize any item already in the administrative record, any item listed on any other party’s exhibit list, and to use demonstrative exhibits that may not be listed. Finally, IDL reserves the right to amend or supplement this list in advance of hearing.

DATED this 5<sup>th</sup> day of September, 2025.

IDAHO DEPARTMENT OF LANDS




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Kayleen Richter  
Counsel for IDL

### CERTIFICATE OF SERVICE

I hereby certify that on this 5<sup>th</sup> day of September, 2025, I caused to be served a true and correct copy of the foregoing 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, ID 83814 <i>Counsel for Applicant River's Edge Apartments and Lanzce Douglass</i>	<input checked="" type="checkbox"/> Email: eat@winstoncashatt.com clk@winstoncashatt.com lanzce@lgdproperties.com
Cindy and Brandon Richardson R & R Northwest 1857 W. Hayden Avenue, # 102 Hayden, ID 83835 <i>Agents for Applicant</i>	<input checked="" type="checkbox"/> Email: cindy.richardson@rrnorthwest.com
Coeur d'Alene Land Company John F. Magnuson 1250 Northwood Center Court, Suite A Coeur d'Alene, ID 83816 <i>Counsel for Objector CDA Land Co.</i>	<input checked="" type="checkbox"/> Email: john@magnusononline.com
Sheriff Robert B. Norris Kootenai County Sheriff's Office P.O. Box 9000 Coeur d'Alene, ID 83816 <i>Objector</i>	<input checked="" type="checkbox"/> Email: kcso@kcgov.us
Peter J. Smith IV Fennemore Craig, PC 418 E. Lakeside Avenue, Suite 224 Coeur d'Alene, ID 83814 <i>Counsel for Potential Intervenor Concerned Citizens</i>	<input checked="" type="checkbox"/> Email: peter.smith@fennemorelaw.com
Amidy Fuson Marde Mensinger Idaho Department of Lands 300 N. 6 <sup>th</sup> Street, Suite 103 Boise, ID 83702 <i>IDL Navigable Waterways Program</i>	<input checked="" type="checkbox"/> Email: afuson@idl.idaho.gov mmensinger@idl.idaho.gov

Kayla Dawson Rachel King Kourtney Romine Idaho Department of Lands 300 N. 6 <sup>th</sup> Street, Suite 103 Boise, ID 83702 <i>Service Contacts for IDL</i>	<input checked="" type="checkbox"/> Email: kdawson@idl.idaho.gov rking@idl.idaho.gov kromine@idl.idaho.gov
Leslie Hayes OAH, General Government Division P.O. Box 83720, Boise, ID 83720-0104 816 W. Bannock Street <i>Hearing Officer</i>	<input checked="" type="checkbox"/> Email: filings@oah.idaho.gov leslie.hayes@oah.idaho.gov

  
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Kayleen Richter  
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