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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

DECLARATION

1. I, Terrie Kavan, 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 The Estates at Waterstone Homeowners Association, Inc.'s 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 The Estates at Waterstone Homeowners Association, Inc. 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 20 day of September, 2025, at Coeur d'Alene, Idaho.

Tennie Kaur
[Signature of Declarant]

□

CERTIFICATE OF SERVICE

I hereby certify that on the 20 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

Agent for Applicant

~ By U.S. Mail

~ By Email

jason@wesslen.com
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Idaho Department of Lands

John Richards, General Counsel

Kayleen Richter, Counsel

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Boise, ID 83702

(208) 334-0200

Counsel for Idaho Department of Lands

~ By U.S. Mail

~ By Email

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Please Save our River !
It's so dangerous
and surf boats are
ruining our
banks.

Marde Mensinger

Program Manager for Navigable Waters

~ By U.S. Mail

~ By Email

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Kourtney Romine

~ By U.S. Mail

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Carah Woodside

DECLARATION : 5 OF 9



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FOREVER USA

DEPT. OF LANDS

SEP 25 2025

BOISE, IDAHO

Attention

Kayleen Richer

Dept of Lands

300 North 6 Street #103

Boise, Idaho

83702

83702-603828

