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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. L-96-S-0206I

Sourdough Point Homeowner's
Association, Sherrel Rhys, President,

Applicant.

Agency Case No. PH-2026-NAV-20-002

OAH Case No. 26-320-06

**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 March 5, 2026. As the record remains open, IDL reserves the right to modify this witness and exhibit list prior to hearing. The following Exhibit List is intended to mirror the unofficial agency record posted online at <https://www.idl.idaho.gov/lakes-rivers/administrative-hearings/sourdough-point-hoa/>. The website is updated on a continuous basis and will include any additional public comments that may be received.

I. WITNESSES

IDL may call the following witnesses in this matter:

1. Mike Ahmer
Idaho Department of Lands – Resource Supervisor – Navigable Waters
3258 Industrial Loop, Coeur d'Alene, ID 83815
Phone: (208)769-1577
2. Any other witness that has been or will be identified or called by any other party,
or any other witness participating in the above-captioned matter.

II. EXHIBITS

IDL may present the following exhibits in this matter:

- **IDL-01** – Application L-96-S-0206I
- **IDL-02** – Legal Notice of Application, Request
- **IDL-03** – Articles of Amendment, Sourdough Point Owner’s Association, Inc.
- **IDL-04** – Notice of Application to Neighbors
- **IDL-05** – Notice of Application to Agencies
- **IDL-06** – Legal Notice of Application, Order Confirmation
- **IDL-07** – Consent for Application, Pamela Legg
- **IDL-08** – Agency Comment from Idaho Department of Fish and Game
- **IDL-09** – Adjacent Owner Objection, Kevin Palmer-Safe Harbor Holdings Corp.
- **IDL-10** – Public Comment, PC 0001-12
- **IDL-11** – Encroachment Permit L-96-S-0206H
- **IDL-12** – Legal Notice of Public Hearing, Order Confirmation

IDL reserves the right to cross-examine any party to this matter, or any non-party witness called to testify during the public hearing. IDL also reserves the right to reference or utilize any document in the record or identified as a possible exhibit by any party or non-party to this matter. IDL further reserves the right to call additional rebuttal witnesses, impeachment witnesses, and any witness identified by the Applicant. Finally, IDL reserves the right to amend or supplement this list in advance of the hearing.

DATED this 20th day of March, 2026.

IDAHO DEPARTMENT OF LANDS

/s/ Kayleen Richter

Kayleen Richter
Counsel for IDL

CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of March, 2026, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

<p>Sourdough Point Homeowner’s Association Sherrel Rhys, President P.O. Box 29 Sagel, ID 83860 (406) 431-8018 <i>Applicant</i></p>	<p><input type="checkbox"/> U.S. Mail <input checked="" type="checkbox"/> Email: sherrelrhys@gmail.com</p>
<p>Bob Presta Kramer Marine 46820 Highway 200 Hope, ID 83836 (208) 264-3021 <i>Agent for Applicant</i></p>	<p><input type="checkbox"/> U.S. Mail <input checked="" type="checkbox"/> Email: bob.cekramer3@me.com</p>
<p>Kevin Palmer Safe Harbour Holdings Corp. 3946 Edenstone Road NW Calgary AB, T3A 3Z6 Canada (403) 585-5588 <i>Objector</i></p>	<p><input type="checkbox"/> U.S. Mail <input checked="" type="checkbox"/> Email: kevin@palmermail.ca</p>
<p>Amidy Fuson Rachel King Marde Mensinger Idaho Department of Lands 300 N. 6th Street Boise, ID 83720 (208) 334-0248 <i>IDL Navigable Waterways Program Contacts</i></p>	<p><input type="checkbox"/> U.S. Mail <input checked="" type="checkbox"/> Email: afuson@idl.idaho.gov rking@idl.idaho.gov mmensing@idl.idaho.gov</p>
<p>Kourtney Romine Kayla Dawson <i>IDL Service Contacts</i></p>	<p><input type="checkbox"/> U.S. Mail <input checked="" type="checkbox"/> Email: kromine@idl.idaho.gov kdawson@idl.idaho.gov</p>
<p>OAH General Government Division P.O. Box 83720 Boise, ID 83720-0104 816 W. Bannock Street (208) 605-4300</p>	<p><input type="checkbox"/> U.S. Mail <input checked="" type="checkbox"/> Email: filings@oah.idaho.gov leslie.hayes@oah.idaho.gov</p>

/s/ Kayleen Richter
 Kayleen Richter
 Counsel for IDL