

BEFORE THE IDAHO DEPARTMENT OF LANDS

RECONSIDERATION IN THE MATTER OF

Application for Encroachment L95S4970B, for
a single-family dock and boat garage,

Evan Brooks Laich Revocable Trust,

Appellant.

AGENCY Case No. RH-2026-NAV-22-001

OAH Case No. 26-320-02

FINAL ORDER

Applicant Evan Brooks Laich Revocable Trust (“Laich”) submitted an email request for reconsideration to Idaho Department of Lands (“IDL”) on January 7, 2026, regarding IDL’s decision denying Laich’s Application to permit the installation of a single-family dock and boat garage located in Mica Bay on Lake Coeur d’Alene. IDL held oral arguments via Zoom on February 6, 2026, conducted by the Office of Administrative Hearings (“OAH”). Chief Administrative Law Judge Bryan Nickels (“ALJ Nickels”) presided over the hearing. On February 24, 2026, ALJ Nickels issued a Findings of Fact, Conclusions of Law, and Recommended Order (“Recommended Order”).

As Director of IDL, my responsibility is to render a Final Order pursuant to Idaho Code § 58-1306(d) and IDAPA 20.03.04.030.08.b, on behalf of the State Board of Land Commissioners (“Board”) based on the record reviewed in the context of my personal expertise gained through education, training, and experience. I relied on, and examined the entire record, including the Recommended Order. For the reasons set forth below, IDL’s Denial Letter of December 1, 2025, is **AFFIRMED**.

I adopt ALJ Nickels’s evidentiary rulings as my rulings. Unless stated otherwise, the Findings of Fact and Conclusions of Law in this Order are substantially adopted from the Recommended Order.

EXHIBITS

The extant agency record in this matter was transmitted as a series of documents which were not formally identified by exhibit numbers. For ease of reference herein, those documents are identified by exhibit numbers as follows:

- **Exhibit 1** – “Other Case Transmittal Sheet,” .pdf name “REC OAH Transmittal Sheet – Laich”
- **Exhibit 2** – “Joint Application for Permits,” .pdf name “REC L95S4970B Application”
- **Exhibit 3** - Letter dated October 21, 2025, “Legal Notice of Application – L95S4970B,” .pdf name “REC Public Notice.”
- **Exhibit 4** – Memorandum dated October 20, 2025, “Notice of Application L95S4970B,” .pdf name “REC Agency notice.”
- **Exhibit 5** – “Order Confirmation,” .pdf name “REC CDA#15276 NOA - L95S4970B.”
- **Exhibit 6** – Press affidavit documents, .pdf name “REC L95S4970B_PressAffidavit.”
- **Exhibit 7** – October 20, 2025 “Courtesy Notification of Application for Encroachment L95S4970B” and completed attachments, .pdf name “REC Brooks Laich Encroachment Permit App - October 2025.”
- **Exhibit 8** – Email dated January 9, 2026 from Eric Valiquette to Colton Carlson, .pdf name “REC email from Valiquette 01092026 -Re_ Brooks Laich Revocable Trust Application L95S4970B.”
- **Exhibit 9** – Letter dated December 1, 2025, “L95S4970 – Application for Combined Boat Garages and Single-Family Dock,” .pdf name “REC L95S4970B BG Denial Letter.”

I. FINDINGS OF FACT

1. On August 13, 2025, IDL received a Joint Application for Permits from Laich, Encroachment No. L-95-S-4970B (“Application”), identifying the purpose of the application as follows: “[p]urpose is to replace the existing single family dock and boat garage” at 4622 W. Mica Shore Road, a lakeside property on Coeur d’Alene Lake (“Laich Property”). Ex. 2, p. 1.

2. The Application identified 2 existing permits (L95S-970A & LU300056) and provided a detailed description of the project as follows: “Remove existing dock system, expose [sic] of off-site. Float in new dock system. Drive piling to secure dock and boat garage in place. System to constructed [sic] off-site with galvanized steel frame, poly floats, and composite decking.” Ex. 2, pp. 2 & 3. The application further noted four impacts for the project: pile driving,

an 864 square foot (ft²) boat garage, a 700 ft² floating dock, and a 267 ft² boat garage. *Id.* at p. 3.

3. **Permit L95S4970A**. The first of these two permits, L95S4970A, related to an existing 864 ft² boat garage at the Laich Property. Ex. 2, pp. 1 & 3.

4. **Permit LU300065**. The second of the permits, LU300056, related to a boat garage which was originally moored at Heyburn State Park. Ex. 2, pp. 13-14.

a. In October 2024, IDL issued a “Notice of Assignment – Temporary Land Use Permit” (to wit, permit LU300056) “for maintenance of a boat garage footprint,” allowing for the transfer of the permit from one party (a Tayva Hart) to another (Bear Waterfront, LLC). Ex. 2, pp. 13-14.

b. The actual boat garage associated with permit LU300056 was demolished at some time prior to the issuance of permit LU300056 on October 15, 2024. Ex. 2, p. 14.

c. On September 17, 2025, Bear Waterfront, LLC assigned permit LU300056 to Laich for \$6,000, via a “Sale and Assignment Agreement for Boat Garage Permit” (“Assignment”). Ex. 2, pp. 16-18. Paragraph 7 of that Assignment provides that the assignment “shall become effective upon the issuance of a combined dock and boat house encroachment permit that incorporates the Permit is [sic] issued by Idaho Department of Lands.” *Id.*, p. 17.

5. A “Project Narrative,” submitted after filing of the Application – and after the assignment of permit LU300056 - was received by IDL on September 29, 2025, further illuminating the scope and intent of the project:

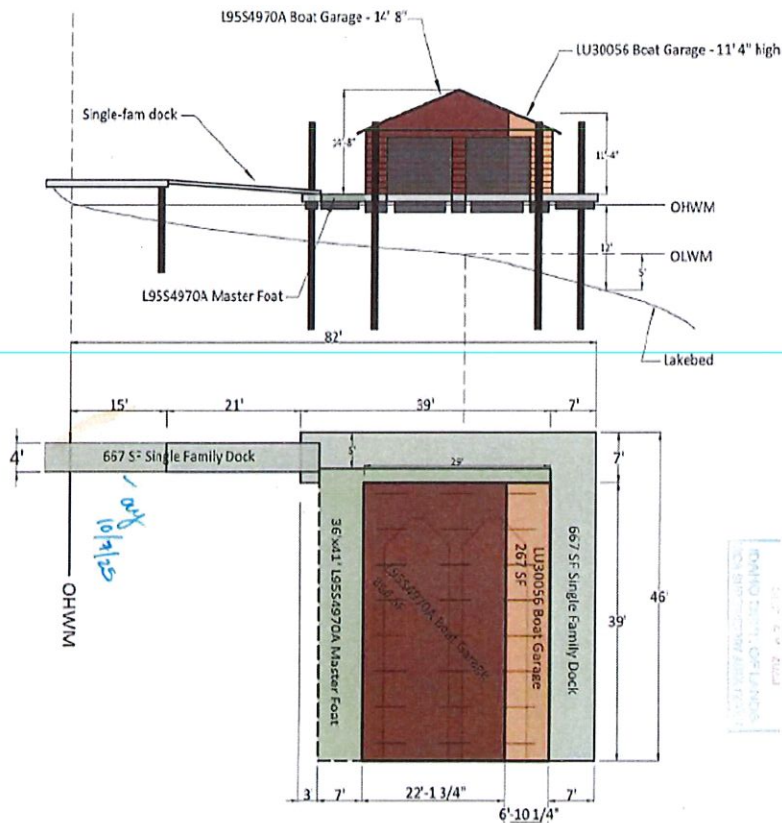
This application is being submitted for the replacement of a boat garage and single-family dock under permit L95S4970A. A second boat garage permit (LU300056) has been acquired by Mr. Laich **and is intended for use adjacent to the existing garage. Both garages will be rebuilt under this application.**

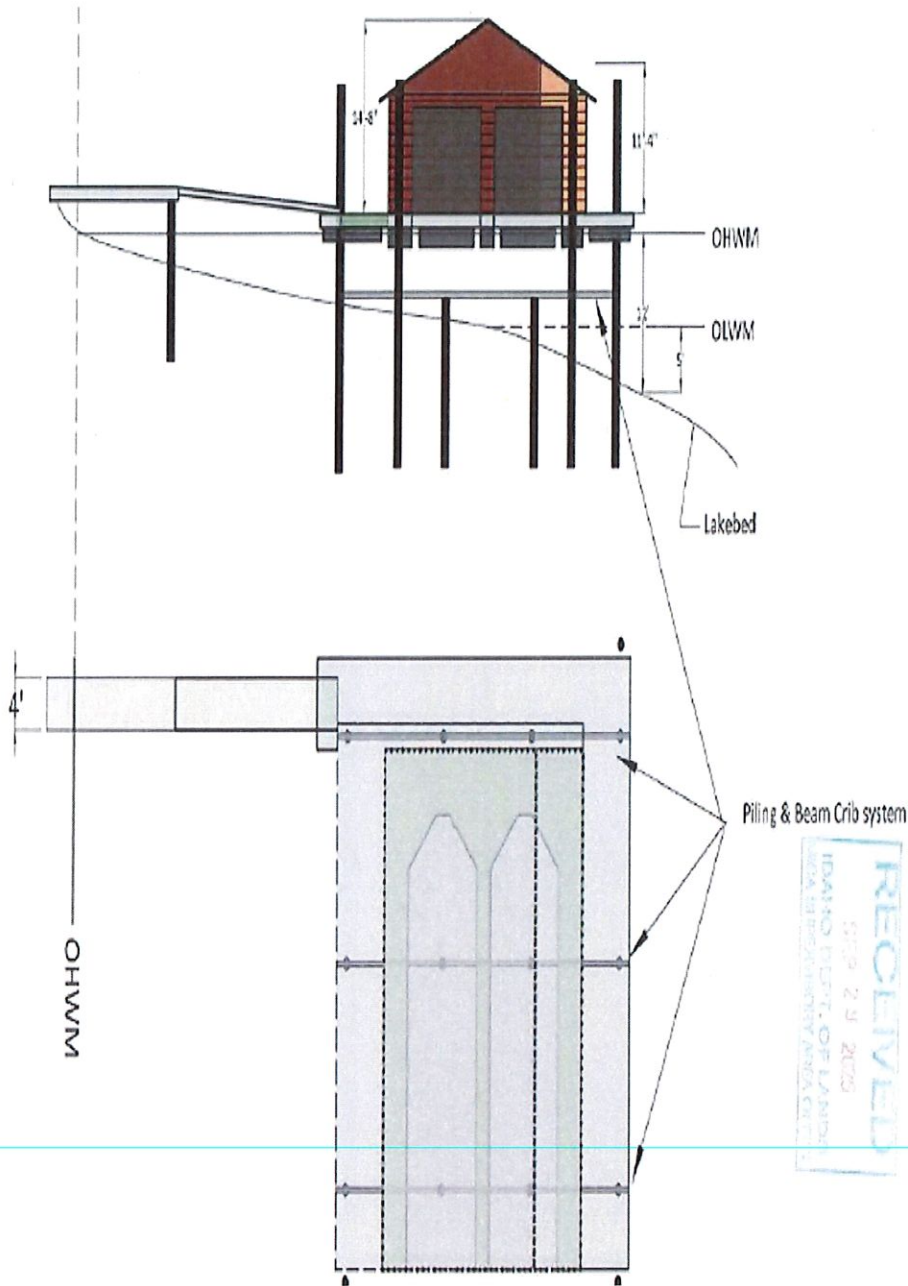
The master float square footage of the existing larger garage (L95S4970A) will be re-used, while the master float associated with the smaller garage (LU30056) will be surrendered. **In addition, the footprint of the second garage is being reduced from its originally permitted 306.375 square feet to 267 square feet.** As a result, the overall square footage of the proposed replacement is less than what could otherwise be constructed if both garages were rebuilt to their maximum allowable dimensions. Both garages will also be rebuilt to their originally permitted heights. This approach reduces garage coverage on Idaho waters and decreases the cumulative encroachment.

The associated single-family dock proposed with this project is limited to 667 square feet—below the 700 square feet otherwise authorized.

Ex. 2, p. 5 (emphasis added).

6. Included with the project narrative were drawings illustrating, as most relevant to this proceeding, that the 2 existing boat garage permits were to be combined to create a single boat garage:





Ex. 2, pp. 6-7.

7. The proposed project – which includes replacement of the single-family dock component as well – reduces the surface area of the original combined elements. Ex. 2, pp. 5. The original boat garage footprint of 864 ft² would be reused; however, the single family dock component would be reduced from 700 ft² to 667 ft², and the LU300056 boat garage footprint

would be reduced from 306.375 ft² to 267 ft² - a net total decrease of 72.375 ft². *Id.* at pp. 5 & 7; *accord*, Ex. 9.

8. The peak height of the L95S4970A portion of the new boat garage would be 14' 8", and the peak height of the LU300056 component would be 11' 4" – each of their original permitted heights. Ex. 2, p. 5 & Ex. 9.

9. Laich also submitted additional information regarding the project, including distances to adjacent littoral lines, property and location maps, and a legal description of the Laich Property. Ex. 2, pp. 9-12.

10. On October 20, 2025, the neighbors adjacent to the Laich Property were notified of the Application, affording them the opportunity to object to the Application. Ex. 7. Both neighbors consented to the Application. *Id.* A Memorandum was also sent to other potentially interested parties; the record does not reflect that any objections were otherwise made. Ex. 4.

11. On October 23 and 30, 2025, IDL ran advertisements in the Coeur d'Alene Press regarding the Application; again, no objections were made. Exs. 3, 5-6, & 9.

12. On December 1, 2025, IDL approved the single-family dock component of the Application, but denied the boat garage component. Ex. 9 ("Denial Letter"). The boat garage component was denied on two grounds: first, the proposed structure would be an improper expansion; and second, the proposed structure would be an improper combination of two existing permit. *Id.*

- a. Improper expansion: The Denial Letter explained: "The L95S4970A boat garage has a height of 14'8", while the LU300056 boat garage has a height of 11'4". The footprint of the proposed boat garage would be larger than either of the existing permitted boat garages. IDAPA 20.03.04.015.05.b expressly states

that applications for permits to construct new boat garages or expand the total square footage of the existing footprint will not be accepted. Expansion is not permitted unless the application is submitted by, or on behalf of, local emergency services.” Ex. 9, p. 2.

- b. Improper combination: The Denial Letter further explained: “Your Application requests consideration that the footprint of the proposed boat garage would be 39.38 square feet less than the combined footprint of the two existing boat garages. However, this mischaracterizes the fact that the Application seeks to construct a new boat garage that expands beyond the total square footage of the current footprint of either of the existing permitted boat garages. Such encroachments are not allowable under IDAPA 20.03.04.015.05.b and d. This restriction is also consistent with IDL's current Policy and Procedures Manual, Section 25(K), "Boat Garage Standards and Requirements," which prohibits combining or enlarging existing boat-garage encroachments beyond their previously authorized dimensions.” Ex. 9, p. 2.

13. On January 7, 2026, Laich requested reconsideration of the Denial Letter. Ex. 8. Although the reconsideration request was made beyond the 20-day deadline provided for in IDAPA 20.03.04.030.08.b (as specified in the Denial Letter), IDL agreed to accept and consider the reconsideration request. *Id.*

II. CONCLUSIONS OF LAW

1. Although this matter is styled as a “reconsideration,” see IDAPA 20.03.04.030.08, no particular standard of review is provided by the governing regulation; as such, the default burden standard under Idaho’s Rules of Administrative Procedure, IDAPA 62.01.01.477 is used.

2. As Laich is the party requesting reconsideration of the action taken by IDL, Laich bears the burden of proof in this proceeding. *See, e.g., Intermountain Health Care, Inc. v. Bd. Of County Com'rs of Blaine County*, 109 Idaho 299, 303 (Ct. App. 1985); IDAPA 62.01.01.477.

3. The standard of proof by which Laich must prove its position is by a preponderance of the evidence. *See, e.g., Northern Frontiers, Inc. v. State ex rel. Cade*, 129 Idaho 437, 439 (Ct. App. 1996); IDAPA 62.01.01.477.

IDL's General Regulatory Authority

4. In 1974, the Idaho Legislature enacted the Lake Protection Act ("LPA"), Title 58, Chapter 13, Idaho Code, stating, in Idaho Code §58-1301, that:

The legislature of the state of Idaho hereby declares that the public health, interest, safety and welfare requires that all encroachments upon, in or above the beds of waters of navigable lakes of the state be regulated in order that the protection of property, navigation, fish and wildlife habitat, aquatic life, recreation, aesthetic beauty and water quality be given due consideration and weighted against the navigational or economic necessity or justification for, or benefit to be derived from the proposed encroachment. No encroachment on, in or above the beds or waters of any navigable lake in the state shall hereafter be made unless approval therefor has been given as provided in this act.

5. The Board of Land Commissioners, through IDL, "shall regulate, control and may permit encroachments in aid of navigation or not in aid of navigation on, in or above the beds of waters of navigable lakes." Idaho Code §58-1303; *see also* Idaho Code §58-119(1) and *Newton v. MJK/BJK, LLC*, 167 Idaho 236, 242 (2020).

6. Through its statutory authority, IDL has promulgated Rules for the Regulation of Beds, Waters and Airspace Over Navigable Lakes in the State of Idaho. See IDAPA 20.03.04.

7. Coeur d'Alene Lake is a navigable lake and is within IDL's authority to regulate encroachment permits. *See generally Lake CDA Invs., LLC v. Idaho Dep't of Lands*, 149 Idaho 274, 277, 233 P.3d 721, 724 (2010).

Boat Garages, Generally

8. Boat garages are defined as “[a] structure with one (1) or more slips that is completely enclosed with walls, roof, and doors, but no temporary or permanent residential area.”

IDAPA 20.03.04.010.06.

9. Boat garages are encroachments not in aid of navigation. IDAPA 20.03.04.010.16.

10. Permitting of boat garages is governed by IDAPA 20.03.04.015.05, which provides:

05. Boat Garage.

- a. Boat garages are considered nonnavigational encroachments.
- b. Applications for permits to construct new boat garages, expand the total square footage of the existing footprint, or raise the height will not be accepted unless the application is to support local emergency services.
- c. Existing permitted boat garages may be maintained or replaced with the current square footage of their existing footprint and height.
- d. Relocation of an existing boat garage will require a permit.

Relevant Guidance Materials

11. Per Idaho Code § 67-5250(3), agencies may create materials “that are intended to guide agency actions affecting the rights or interests of persons outside the agency.” These materials must be made available to the public via agency website. I.C. § 67-5250(4). While guiding agency actions, agency guidance documents generally do not have the force and effect of law. I.C. §67-5207A.

12. IDL’s Denial Letter references “Policy and Procedures Manual, Section 25(K), ‘Boat Garage Standards and Requirements,’ which is located under IDL’s “Agency Guidance Documents” webpage (<https://www.idl.idaho.gov/agency-guidance-documents/>) under the

“Protecting Natural Resources” menu, as the “Lakes and Rivers”/“Encroachments Procedures” submenu link. See <https://www.idl.idaho.gov/wp-content/uploads/sites/2/2026/01/EncroachmentsProceduresAndReferenceDocuments-Jan2026.pdf> (rev. July 2025) (last retrieved February 24, 2026) (“Encroachments Procedures”). Section 25(K)(1) provides, in relevant part: “Existing, permitted boat garages may not be combined to create larger boat garages.” *Id.*

13. This document complies with the requirements of I.C. § 67-5250(4) and, while not having the force and effect of law and not having any determinative effect in this matter, is consistent with IDL’s determination as reflected in the Denial Letter and, as discussed below, with governing statutes and regulations. *See generally* I.C. § 67-5250(3) (“‘Agency guidance’ means all written documents, other than rules, orders, and pre-decisional material, that are intended to guide agency actions affecting the rights or interests of persons outside the agency. ‘Agency guidance’ shall include memoranda, manuals, policy statements, interpretations of law or rules, and other material that are of general applicability, whether prepared by the agency alone or jointly with other persons.”).

Procedures Governing this Proceeding

14. As no objection was made to the Application in this matter and no hearing was held, this proceeding is governed by IDAPA 20.03.04.030.08, which provides:

08. Decision Where No Hearing.

- a. In the event no objection to the proposed encroachment is filed with IDL and no public hearing is requested under Subsection 030.04, or ordered by the Director under Subsection 030.01, IDL, based upon its investigation and considering the economics of the navigational necessity, justification or benefit, public or private, of such proposed encroachment as well as its detrimental effects, if any, upon adjacent real property and public trust values such as navigation, fish and wildlife habitat, aquatic life, recreation, aesthetic beauty,

water quality, etc. will prepare and forward to the applicant its decision.

- b. The applicant, if dissatisfied with the Director's decision, has twenty (20) days from the date of the Director's decision to request reconsideration thereof. If reconsideration is required, the Director will set a time and place for a reconsideration hearing, not to exceed thirty (30) days from receipt of the request, at which time and place the applicant may appear in person or through an authorized representative and present briefing and oral argument. Upon conclusion of reconsideration, the Director will, by personal service or by registered or certified mail, notify the applicant of his final decision.

15. Based upon the December 1, 2025 Denial Letter, Laich had until December 21, 2025 to timely request reconsideration of the Denial Letter. Laich's January 7, 2026 request for reconsideration was untimely; however, IDL agreed to waive the December 21, 2025 deadline.

16. Based upon Laich's January 7, 2026 reconsideration request, the hearing upon the reconsideration request was to be held no later than February 6, 2026. As such hearing was held on February 6, 2026, the hearing was timely completed pursuant to IDAPA 20.03.04.030.08.b.

Discussion

17. No statute or regulation expressly authorizes, or prohibits, the combination of two existing boat garage permits into a new, single boat garage structure, whether permitted under a single permit or pursuant to the two existing permits.

18. To identify such basis, an initial question relevant to the resolution of this matter is which regulation governs: whether, under IDAPA 20.03.04.015.05, Laich's proposed project is to construct a new garage or expand the size of an existing garage (per subsection b, "to construct new boat garages, expand the total square footage of the existing footprint, or raise the height"), or is a project where two existing boat garages are simply being replaced with equally-sized replacements (per subsection c, "[e]xisting permitted boat garages may be maintained or replaced with the current square footage of their existing footprint and height."). However, resolution of this question does not necessarily hinge on which of these subsections apply; instead, the regulations'

definition of “boat garage” provides the answer under either subsection.

19. Laich’s project proposes to: 1) destroy the existing permitted boat garage at the Laich Property; 2) utilize the existing permitted footprint of the now-demolished Heyburn State Park boat garage; and 3) place the permitted footprints side-by-side within the slip portion of the single-family dock and build a new, single boat garage structure over the combined footprints.

20. By definition, a “boat garage,” as above, is “[a] structure with one (1) or more slips that is **completely enclosed with walls, roof, and doors**, but no temporary or permanent residential area.” IDAPA 20.03.04.010.06 (emphasis added). The necessity of being “completely enclosed” provides the necessary analytical framework under both 20.03.04.015.05.b and .c.

21. Laich’s Application proposes a single completely-enclosed structure, completely replacing the existing boat garage at the Laich Property with a new, larger structure, in conjunction with the complete replacement of the existing single-family dock. Thus, under subsection b, the proposal clearly proposes the construction of a new boat garage which also proposes to “expand the total square footage of the existing footprint.” A project under subsection b would be prohibited in the context of the Laich Property, as such project would not “support local emergency services,” as required by subsection b. On this basis alone, denial is proper.

22. However, in an attempt to accomplish through subsection c what subsection b will not permit, Laich essentially characterizes the new structure as being two abutting boat garages, each being equally- (or smaller-) sized replacements of their prior iterations within their originally-permitted footprints. This is problematic for the following reasons:

- a. If one were to view the two abutting permits’ proposed boat garages as independent, standalone, permitted structures, neither would actually be a legal “boat garage,” as neither are “completely enclosed” within their permitted

footprint. Instead, each must rely on the other for ‘complete enclosure’ – however, enclosure by some other structure outside of the permitted footprint of a permitted boat garage is plainly not contemplated by existing regulation, and nothing in existing law, or even guidance materials, suggest that such a construction is authorized. *Accord, generally*, Encroachments Standards 25(K)(2)(“Boat garage footprint: Area enclosed by the walls and roof.”). This would not only wholly untether the concept of a “footprint” with the governing permit, but would also otherwise disregard the plain meaning of the definition of “boat garage.” *See Stafford v. Idaho Dep’t of Health & Welfare*, 145 Idaho 530, 533, 181 P.3d 456, 459 (2008) (“Administrative regulations are subject to the same principles of statutory construction as statutes.”); *Verska v. Saint Alphonsus Reg’l Med. Ctr.*, 151 Idaho 889, 893, 265 P.3d 502, 506 (2011) (“The interpretation of a statute “must begin with the literal words of the statute; those words must be given their plain, usual, and ordinary meaning; and the statute must be construed as a whole. If the statute is not ambiguous, this Court does not construe it, but simply follows the law as written.”).

- b. However, even were one to accept that a “boat garage” might be “completely enclosed” by some other structure outside of the boat garage’s own permitted footprint (here, to wit, by abutting two 3-walled structures against each other to create a ‘complete enclosure’), then the ‘enclosure’ as including the adjacent structure *ipso facto* runs afoul of subsection c. Subsection c unequivocally requires that a replacement of a boat garage must be to “the current square footage of their **existing footprint and height.**” (emphasis added). Looking

beyond the bounds of the permitted footprint to find the fourth wall (and related roof) to ensure a “complete enclosure” naturally requires a larger footprint than originally permitted. Moreover, and is clear here, for LU300056 to be “completely enclosed” under Laich’s proposal, it must rely on the structure – including the roof – of L95S4970A. That structure rises to a height of 14’8”, well above the existing permitted height of 11’4” for LU300056. That is, the rebuilt LU300056 boat garage would not be able to exist without reliance on an over-height structure outside of the existing permitted footprint. This plainly violates subsection c.

- c. Additionally, as a further aside, although not currently at issue in this proceeding, treating the proposed projects as separate, independent rebuilds of two different permitted “boat garages” also provides an answer to the overarching question. Were there to come a circumstance where one permit – but not the other – were to be assigned, revoked, etc., neither structure would be “completely enclosed” as required by regulation, thereby requiring a new, e.g., application and/or revocation process to remedy the deficient structures. *See generally, e.g., IDAPA 20.03.04.65 & 20.03.04.80.*

23. Finally, Laich’s arguments about the project reducing the cumulative encroachment on the lake, improving the aesthetics of the lake, and/or otherwise avoiding an illogical result (contending IDL’s position “incentivizes fragmentation of encroachments and discourages their reduction”, Laich’s Brief at p. 4), all allegedly inconsistent with policy regarding encroachments upon navigable waters, ultimately only raise policy concerns.

- a. First, the governing regulations – while not squarely addressing the exact

circumstance of a proposed combination of existing boat garage permits – are to be construed as written based upon their plain meaning, and here, such a reading supports IDL’s determination in this matter. Even if one is to perceive that the result of such a reading is “illogical,” under Idaho law, decisionmakers are to apply the laws as written, and leave policy decisions to those who make policy:

Thus, we have never revised or voided an unambiguous statute on the ground that it is patently absurd or would produce absurd results when construed as written, and we do not have the authority to do so. “The public policy of legislative enactments cannot be questioned by the courts and avoided simply because the courts might not agree with the public policy so announced.” Indeed, the contention that we could revise an unambiguous statute because we believed it was absurd or would produce absurd results is itself illogical.

Verska v. Saint Alphonsus Reg'l Med. Ctr., 151 Idaho at 896 (cleaned up). For this reason, the Director declines to override existing regulations to make a different policy determination to reach Laich’s desired result.

- b. Second, IDL is given broad authority to determine the appropriateness of encroachments, both by statute and regulation. See I.C. § 58-1303; IDAPA 20.03.04.012. Here, the ultimate disposition of boat garage permits transferred from Heyburn State Park is one for IDL to determine, including how those permits may be utilized in other navigable waterways in Idaho.

24. Thus, while there is no specific statutory or regulatory law expressly authorizing, or precluding, the combination of existing boat garage permits to construct a new, single boat garage, there is no viable path for such a project under the existing regulations.

25. For these reasons, IDL's denial of the Application is appropriately affirmed.

ORDER

Based on the foregoing Findings of Fact and Conclusions of Law, IT IS HEREBY ORDERED that IDL's Denial Letter of December 1, 2025, is **AFFIRMED**.

This is a final order of the agency. Pursuant to I.C. § 58-1306(d) and IDAPA 20.03.04.030.09, Appellant or any aggrieved party who appeared at the hearing has a right to have the proceedings and this Final Order reviewed by the district court in the county where the encroachment is proposed by filing a notice of appeal within thirty (30) days from the date of this Final Order.

Appellant is not required to post a bond with the court to prosecute an appeal. Any other aggrieved party shall be required to deposit an appeal bond with the court of not less than \$500 insuring payment to the applicant of damages caused by delay and costs and expenses, including reasonable attorney fees incurred on the appeal if the Final Order is sustained. The filing of a petition for judicial review does not itself stay the effectiveness or enforcement of this Final Order under appeal pursuant to I.C. § 67-5274.

IT IS SO ORDERED.

DATED this 5th day of March, 2026.

IDAHO DEPARTMENT OF LANDS



DUSTIN T. MILLER
Director

CERTIFICATE OF MAILING

I hereby certify that on this ___ 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:

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