

Allison Olson, ISB #11942  
Legal Counsel  
Idaho Department of Lands  
300 N. 6<sup>th</sup> St., Suite 103  
Boise, ID 83702  
(208) 334-0200  
aolson@idl.idaho.gov

*Attorney for Idaho Department of Lands, Navigable Waters Program*

BEFORE THE STATE BOARD OF LAND COMMISSIONERS  
STATE OF IDAHO

IN THE MATTER OF

Encroachment Permit Application No.  
L96S2798A

Valiant Idaho, LLC and Valiant Idaho II, LLC,  
  
Applicant.

Case No. PH-2024-NAV-20-002

OAH Case No. 24-320-05

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

The Idaho Department of Lands (IDL), by and through its counsel of record Allison Olson, counsel for the Department of Lands, and in accordance with the Hearing Officer's request, hereby submits the following Witness and Exhibit List for the above-entitled matter. This witness and exhibit list disclosure is subject to modification as the disclosure deadline set in the August 30, 2024, Scheduling Order is not until September 27, 2024. The following exhibit list is designed to mirror the unofficial agency record that is posted online at <https://www.idl.idaho.gov/lakes-rivers/administrative-hearings/idaho-club-trestle-creek-project/>. The website is updated on a continuous basis and will include all public comments once those become available to be posted.

/

/

/

## **Exhibit List**

- **IDL-001** – Valiant Idaho OAH Transmittal Sheet
- **IDL-002** – Agency notice
- **IDL-003** – Neighbor Notices
- **IDL-004** – Order confirmation, legal notice in paper
- **IDL-005** – L96S2798A – Application-2024-07-25-complete
- **IDL-006** – L96S2798A – Idaho Club Marina Application Appendices List
- **IDL-007** – L96S2798A – 1 – Easement Documents in Support of Restoration
- **IDL-008** – L96S2798A – 2 – East Branch Trestle Creek Restoration Plan
- **IDL-009** – L96S2798A – 3 – Test Excavation – Sediment Analysis
- **IDL-010** – L96S2798A – 4 – Wetland Delineation Report
- **IDL-011** – L96S2798A – 5 – Hydrogeology Report
- **IDL-012** – L96S2798A – 6 – Preliminary SWPPP and BMPS
- **IDL-013** – L96S2798A – 7 – Preliminary Interim Vegetation Restoration Planting Plan
- **IDL-014** – L96S2798A – 8 – Bonner County Planning Department Approval File
- **IDL-015** – L96S2798A – 9 – USCG Application Materials Bridge
- **IDL-016** – L96S2798A – Idaho Club – Marina Lakeshore Community-Sewell-Exhibits – June 2024-Final
- **IDL-017** – Notice of Appointment of Hearing Officer
- **IDL-018** – Notice of Scheduling Conference
- **IDL-019** – Scheduling Order
- **IDL-020** – Comments IDL – 00001-00016
- **IDL-021** – Comments Memo – 000001-2
- **IDL-022** – Comments Public Comment – 00001-145

IDL reserves the right to cross-examine any party to this matter, or any non-party witness called to testify during the contested case 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. Finally, IDL reserves the right to amend or supplement this list in advance of the hearing.

DATED this 20<sup>th</sup> day of September, 2024.



---

ALLISON OLSON  
Counsel for the Department of Lands

## **CERTIFICATE OF SERVICE**

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

Will Haberman Valiant Idaho, LLC & Valiant Idaho II, LLC 151 Clubhouse Way Sandpoint, ID 83864 (407) 973-7875 <i>Applicants</i>	✕ Email: <a href="mailto:wh@theidahoclub.com">wh@theidahoclub.com</a>
Jeremy Grimm Whiskey Rock Planning + Consulting 218 Cedar St., Suite 208 Sandpoint, ID 83864 (208) 946-9944 <i>Applicants' Agent</i>	✕ Email: <a href="mailto:jeremy@whiskeyrockplanning.com">jeremy@whiskeyrockplanning.com</a>
Allison Olson Idaho Department of Lands 300 N. 6 <sup>th</sup> St., Ste. 103 Boise, ID 83702 (208) 334-0200 <i>In-house Counsel for IDL</i>	✕ Email: <a href="mailto:aolson@idl.idaho.gov">aolson@idl.idaho.gov</a>
Marde Mensinger Idaho Department of Lands 300 N. 6 <sup>th</sup> St. Boise, ID 83720 (208) 334-0248 <i>IDL Program Manager for Navigable Waters</i>	✕ Email: <a href="mailto:mmensinger@idl.idaho.gov">mmensinger@idl.idaho.gov</a>
Kourtney Romine Kayla Dawson <i>Service Contact for IDL</i>	✕ Email: <a href="mailto:kromine@idl.idaho.gov">kromine@idl.idaho.gov</a> <a href="mailto:kdawson@idl.idaho.gov">kdawson@idl.idaho.gov</a>
OAH General Government Division P.O. Box 83720 Boise, ID 83720-0104 816 W. Bannock St. (208) 605-4300	✕ Email: <a href="mailto:filings@oah.idaho.gov">filings@oah.idaho.gov</a>

A handwritten signature in blue ink that reads "Allison Olson". The signature is written in a cursive, flowing style.

---

Allison Olson  
Counsel for IDL