

SCOTT AND SHERYL SCOFIELD
JOSE JARA AND RICHARD TEICH
Dba Concerned Citizens Against Additional 100
Boat Slips Added To Templin's Resort On Spokane River
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Objectors

BEFORE THE STATE BOARD OF LAND COMMISSIONERS
STATE OF IDAHO

In the Matter of Application to Permit the
Expansion of a Commercial Marina,
Reconfigure Existing Fuel Lines, and Build
a New Ship Store on Spokane River,

414 PF Hospitality, LLC,

Applicant.

AGCY. CASE NO. PH-2024-NAV-
22-004

OAH Case No. 24-320-09

**OBJECTORS' CLOSING
STATEMENT**

Objectors Scott and Sheryl Scofield, and Jose Jara and Richard Teich (dba Concerned Citizens Against Additional 100 Boat Slips Added to Templin's Resort on Spokane River), on behalf of local residents, and in accordance with the Hearing Officer's request, jointly submit the following Closing Statement for the above-entitled matter.

I. BACKGROUND

The Objectors did not file a Pre-Hearing Statement, but they incorporate by reference the factual background in their submitted correspondence and testimonies into this Closing Statement, as permitted. Additionally, since the record remained open after the Applicant's Pre-Hearing Statement was filed, the Objectors note the following additional facts that have been incorporated into the record since that time:

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On December 19, 2024, a public hearing was held at Coeur d'Alene High School Auditorium in Coeur d'Alene, Idaho. After representatives for the Applicant and Idaho Department of Lands ("IDL") presented their materials, the public was called to testify. Twelve individuals with interests in the expansion were sworn in and provided factual testimony at the hearing. Approximately seventy-five (75) members of the surrounding community also attended, but the rest declined to provide testimony at the hearing. It was then announced that written comments would continue to be accepted by the Department until December 27, 2024. After the public hearing, IDL received multiple written comments from the public opposing this application. IDL also received many requests for a new hearing, with many residents being out of town or otherwise occupied by holiday events, because it was held so close to Christmas.

II. STANDARDS FOR DECISION

The operative standard for a decision on the Application is admittedly, "[i]f . . . following a public hearing, the Department determines that the benefits, whether public or private, to be derived from allowing such encroachment exceed its detrimental effects, the permit will be granted". IDAPA 20.03.04.30.10. However, the rule also clearly requires the department to "consider unreasonable adverse effect[s] upon adjacent properties and undue interference with navigation the most important factors to be considered in granting or denying an application..." under certain circumstances. *Id.* While it could be disputed that the consideration of adverse effects and interference to navigation is not paramount in all cases, the Objectors in this case argue that the Judge should not ignore these important impacts, or any other detrimental effects, but should rather give them the proper weight.

The Applicant argues that the project will create additional recreational and economic

benefits, but it ignores the many detriments created by added congestion on the river, increased pollution, even greater encroachment on navigation, and the effects on neighboring landowners, among other concerns required to be considered under any truly thorough benefit-versus-detriment analysis. This comports with IDAPA standards, which state:

It is the express policy of the State of Idaho that the public health, interest, safety and welfare requires that all encroachments upon, in or above the beds or 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 weighed against the navigational or economic necessity or justification for, or benefit to be derived from the proposed encroachment.

IDAPA 20.03.04.012.01

Furthermore:

Encroachments not in aid of navigation in navigable lakes will normally not be approved by the Department and will be considered only in cases involving major environmental, economic, or social benefits to the general public.

IDAPA 20.03.04.30.02.

The Objectors argue that the Applicant's requested commercial navigational encroachment does not align with this policy in the areas of attempting to expand its footprint out to the (unpermitted) log boom, altering the already-set Line of Navigability, safety of the public, encroachment into the west adjacent neighbor's waters (Greenview Condos) and invading their riparian and/or littoral lines and rights, impaired and diminished recreation on the river and No-Wake Zone, as well as increased boat traffic on a river that is approaching or already exceeding maximum carrying capacity, resulting in amplified damage to property, shorelines, possibly aquatic life, and diminished aesthetic beauty.

These policies would each apply to the proposed marina project in this case, because its

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approval would create a 320-foot navigational choke-point at the rocky cliff of the private residences directly across from the enlarged Ship Store and twin fueling stations that will be located to the southeast. This choke-point will most likely cause undue interference with navigation due to this all-points “intersection” where boats will be attempting to navigate into the two new fueling stations, separated only by a corner. The new navigational areas would protrude into this choke-point. (See Attachment #1). This area must also accommodate the passage of other boats entering and exiting the river or No-Wake Zone, and since it would be narrowed drastically, with the opposite side being a shallow rocky point, that choke-point would significantly interfere with navigation on the river.

It should also be noted that the Spokane River is dam-controlled, and its water level fluctuates throughout the seasons in this area, creating artificial high (or low) water marks. The fluctuating water levels, in combination with the enormous, immovable cliff that also has a naturally occurring shallow, underwater, rocky point, being across from the Ship Store / fuel station, the proposed increased enter/exit traffic and fueling-station congestion - all being positioned at this 320-foot choke-point - is a dangerous plan that will negatively impact both navigability and emergency response times on the river. The Department is encouraged to deny any expansion outside of the original footprint for these reasons. If the Applicant receives approval to expand outside of the original footprint, there is simply no environmental or social benefit for the public or the Objectors. The public would benefit more with the Applicant maintaining its original footprint and one fuel pump. There is another pump at The PF Landing Marina just on the other side of the Spokane Bridge, so adding a pump here is unnecessary. The public will benefit more if the current No-Wake Zone is maintained.

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There is really only one benefit here: a financial benefit to the Applicant and its business. The public will face only detrimental consequences, with the Objectors and neighboring landowners, up and down the river, left to bear the impact and deal with the consequences.

III. OBJECTORS' ANALYSIS OF COMPLIANCE WITH THE LPA AND RULES

The Objectors' concerns fall into five categories: a) Unpermitted Encroachment Outside of Footprint, b) Line of Navigability, c) Safety, d) Greenview Condos, and e) Erosion.

a. Unpermitted Encroachment Outside of Footprint

The Applicant is planning on encroaching to the west, south and the east of the current marina footprint. In the Applicant's Pre-Hearing Statement, in Section 5.1.5, the Applicant states "The log boom is a defined boundary of the existing encroachment permit". Attorney Hislop repeated that claim a number of times while presenting his material at the December 19, 2024, hearing. During the hearing, and referencing its recording, a discussion began about 1 hour and 25 minutes into the meeting about what exactly the Applicant's current permit encompasses. At about 1 hour and 29 minutes, it was admitted that the log boom encroachment is not currently permitted as part of the Applicant's marina, and it never has been part of any marina permit in the past. Because the log boom is not in fact a defined boundary under the current permit, it is not a transferred right of encroachment. Immediately following this admission, IDL employees stated they disagreed with Mr. Hislop's claim about maintaining the original footprint of the encroachment permit. Mr. Ahmer with IDL then confirmed that the new design (the extended docks, enlarged ship store and the surrounding walkway/breakwater) would reset the marina footprint. It is therefore clear that the Applicant is attempting to claim navigable waterways out to and beyond the current log boom; a significant increase.

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This new encroachment would amount to a 2+ acre water grab that would directly conflict with the IDL's responsibility to rule in the public's interest and for the public's use, especially when it is weighed between profit of big business (economic benefit) versus the public navigating and recreating in the designated area. IDAPA 20.03.04.012.01. If the encroachment is granted and they are allowed to extend the log boom line to the east, The Applicant will create a dangerous 320-foot choke-point and obstruction at the entrance/exit point of the river and No-Wake Zone; this will be addressed in Safety. (see Attachment #1). This does not comply with the applicable rules.

b. Line of Navigability (LON)

"Line of navigability" is defined by Idaho Law as "a line located at such distance waterward of the low water mark established by the length of existing legally permitted encroachments, water depths waterward of the low water mark, and by other relevant criteria determined by the board when a line has not already been established for the body of water in question." Idaho Code § 58-1302(g). More practically, it is considered to be the point at which a body of water is deep enough for a boat to pass through or moor. The Applicant's attorney, Mr. Hislop, stated that enlarging and moving the ship store and fueling pumps out to the furthest southeast point of the encroachment is beneficial. We disagree and it is our position that extending all the docks, moving the ship store to the furthest southeast point and adding the 16' walkway/breakwater out past the (unpermitted) log boom requires a change of the already narrow Line of Navigability in the area, determined by three points; 1) the footprint of the original marina 2) the area where vessels currently navigate through the deep middle of the river, and 3) the log boom itself. No structure may extend beyond the normal LON established

through use. This is supported by the IDAPA:

Docks, piers, or other works may extend to a length that will provide access to a water depth that will afford sufficient draft for water craft customarily in use on the particular body of water, except that no structure may extend beyond the normal accepted Line of Navigability (LON) established through use unless additional length is authorized by permit or order of the Director.

IDAPA 20.03.04.015.13.d.

During the Site Walk-Through on December 20, 2024, Attorney Hislop was asked by the Objectors if the Applicant plans to continue renting moorage on the surrounding breakwater/walkway to large yachts and houseboats. Mr. Hislop took a lengthy pause and answered that they did not know at this time. However, since it is currently being done and it would be an additional revenue stream, it is safe to assume that they would indeed continue doing so in the future. This would add to the further encroachment into the No-Wake Zone. We oppose this extensive encroachment as it will have a great impact on the No-Wake Zone.

Extending the marina out to the log boom, adding a 16' walkway/breakwater thereafter, mooring large yachts or houseboats on the exterior of the breakwater, and finally allowing for a safe distance between any moving vessel, FORCIBLY REDIRECTS the Line of Navigability (LON), southwards. This would force many boats, and the navigation path itself, south into the shallower recreation area, where it is not uncommon to encounter dead-head logs that project out of the water, presenting a serious navigation hazard and safety issue for boaters. We have estimated that the new navigational path will extend a minimum of 211' – 261' further out into the No-Wake Zone from the original footprint of the marina. That is an extreme amount of space since the No-Wake Zone is already so small, at roughly a ½ mile radius. As a recreation area for local families to anchor and swim, for paddleboarders and kayakers to paddle safely,

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and for anglers to slowly motor around while fishing; it is the safest portion of the river. Indeed, it is not unusual for 20 to 40 boats to anchor there each day. A *much smaller* No-Wake Zone resulting from the Applicant's expansion would be an enormous detriment to the public, without any significant public benefit.

c. Safety

Safety is of the utmost importance on the Spokane River, and for the greatest public benefit under IDAPA policy, it needs to be carefully protected by the IDL. There are many safety issues, but three (3) elements will be addressed for this permit discussion: 1) maximum carrying capacity ("MCC") of boats on the river, 2) oversaturation of boat slips in about a ½ mile radius, and 3) the relocation of the sheriff's garage.

1. Maximum Carrying Capacity

MCC can be defined as the maximum number of boats that can safely navigate the Spokane River, without unnecessarily putting lives in jeopardy or destroying shorelines and docks. Adding another hundred easy-to-access boats to this end of the river will only further compound congestion, boat traffic, and pollution. Many residents believe that our river reached MCC a few years ago, or if not, is rapidly approaching MCC, even without new berths being added. Consequently, local residents will not allow their families to navigate the river on weekends, holidays and peak hours because of added traffic and increased danger. The Spokane River is extremely narrow and shallow in many places, so when boaters are unfamiliar with the river, such as short-term vacationers, this adds a critical element of risk.

The sheriff has made no comment, other than claiming that there have been no major accidents on the river. But local residents know better. There is actually no reporting system for

near misses or non-injury accidents. And since the marine deputies only patrol sporadically, the department does not even know about all incidents that occur on the river regularly. If given more time, public testimony would yield more evidence of such incidents. During the December 19, 2024 hearing, we heard about two incidents. As we went door to door, we were told story after story of children and adults being swept off docks by waves, children and grandchildren not being able to swim in front of personal property, close calls while paddling on the river, and near misses with wave-runners. These experiences would have been better communicated had the Applicant's development plan been better communicated to the public in a more transparent manner, and if the hearing was not held the week before Christmas.

2. Oversaturation of boat slips in a ½ mile radius No-Wake Zone

The No-Wake Zone is, at best, ½ mile radius and could be less. Yet, it houses 361 slips between Templin's Marina, Greenview Condos, and the PF Landing Marina just west of the Spokane Bridge, as well as 19 private resident docks. That is 380 total slips and/or docks in one, tiny No-Wake Zone: *three hundred and eighty*. During the December 19, 2024, public hearing, another commentor testified that he attempted to count the total number of docks on the Spokane River, estimating 512. In a comparison between the No-Wake Zone and the rest of the 10-mile-long river, the number of boat slips in the ½ mile No-Wake Zone accounts for about 43% of all the slips on the river. The No-Wake Zone has 380 and the entirety of the Spokane River has 512. The Applicant is applying to add 100 additional boat slips, bringing the No-Wake Zone total to 480 boats slips. That would increase the No-Wake Zone to 49% of the river's entire river's boat slips. The Applicant and IDL need to tell us why they think it's a good idea and safe for *nearly ½ of all the boats on the entire river(49%)*, to be housed in the very

small, no-wake zone. This added capacity will only further congest boat traffic and exacerbate safety issues on the river.

All boaters that moor in the no-wake zone must travel down the entire length of the Spokane River to get to Lake Coeur d'Alene to recreate, to enjoy lakeside restaurants, to tour other bays on the lake, etc. These boats have to navigate through the families or individuals recreating in the No-Wake Zone in order to get on the river or go to Lake Coeur d'Alene. While they may not all be traveling at the same time, having potentially 480+ boats traveling through the No-Wake Zone, will be extreme. And that doesn't account for any of the many other boats launched at the Q'emiln Park Public launch.

Furthermore, if this Application is approved, it has come to our attention that the PF Landing Marina on the west side of the Spokane Bridge is considering applying for a permit with IDL, to also add additional boat slips. Would that be 25 more? 50 more? 100 more? If the Applicant's permit is approved, it could open the flood gates for further applications under a lax approval standard.

3. The relocation of the Sheriff's Boat Garage

In an emergency, response time is critical to favorable outcomes. In the Applicant's Pre-hearing Statement, and while presenting his material at the public hearing, Mr. Hislop stated that the sheriff's garage was being relocated to a 'better' location. According to the Applicant's permit drawings (see Attachment #1), the new location is in the middle of the reconfigured marina. In this new configuration, before responding to any emergency on the river, the Sheriff's boat would need to wait for any vessels that are already in the narrow, one way out, marina exit channel before proceeding. The sheriff's boat must then travel west to exit the

marina, and then turn left (to port), navigate past the breakwater and any vessels moored on the walkway/breakwater, turn left again (to port) and then weave through the boats that could be anchored in the No-Wake Zone, then finally navigate the chokepoint before exiting onto the river towards an emergency.

Relocating the Sheriff's garage further into the marina obstructs its exit path and will undoubtedly increase emergency response time. This relocation has significant safety implications for anyone needing assistance or medical attention on the river. Currently, the Sheriff's garage is in an excellent location on the southwest exterior portion of the current marina. In an emergency, the marine deputy can swiftly leave the marina, head east towards the river via the current line of navigation, and exit the No-Wake Zone, where there is currently no choke-point. The sheriff's garage is currently in a safe, prudent location. (See Attach #1 & 2).

The Applicant should explain the benefit of moving the sheriff's boat garage into the middle of the marina. It appears to be a detriment to the sheriff and the public, but a benefit to The Applicant since they have assigned a large percentage of the private boat slips to the outermost fingers of the marina. This would be in conflict with the following IDAPA policy: When private moorage is permitted; the public moorage must be of similar size and quality as private moorage. IDAPA.20.03.04.015.03.g. Here, private access is beneficially assigned nearest the exits. Not so for the public moorages and the sheriff's garage, which are relegated to the middle, with the longest exit and travel times. None of these comport with Idaho Law or IDAPA.20.03.04.012.01.

d. Greenview Condominiums

The Greenview Condominium owners, to the west of the Applicant's property, were

disproportionately impacted in two (2) ways in this case: Lack of Lawful and Equitable Notification, and Unfavorable Littoral or Riparian Lines/Rights.

It was discovered during Mr. Hislop's presentation of material at the public hearing, and through testimony by a Greenview Condominium owner, that the Applicant's official notice of the Application for Commercial Encroachment to the owners of the Greenview Condominiums was mailed to an incorrect address and Returned to Sender. Consequently, the Greenview Condominium owners were not properly informed of the Applicant's application in a lawful and timely manner. Similarly, the River Run Homeowners' Association, to the east of the Applicant were also not properly notified of the hearing date. In accordance with IDL policy, the Application must include Names and current mailing addresses of adjacent littoral landowners. IDAPA.20.03.04.20.07.a.vii. It was also disclosed that no further action was taken to follow up and send the Notice of Encroachment Application to the correct address (although IDL has the correct address for a bill they send annually). As a result, Greenview Condominium owners were unable to object to the encroachment via legal channels, because they simply did not receive adequate notification of the application and hearing.

Secondly, the littoral line proposed by The Applicant follows such a path that it would result in an easterly deviation at a 45-degree angle, rather than the characteristic 90-degree angle from the shoreline, which improperly encroaches on the Greenview Condominium's current littoral area. Almost the entire portion of marina Dock H encroaches into and in front of the east portion of the Greenview Condominiums, thus usurping their water, navigation space and obstructing their proximal sightline of the No-Wake Zone, once the largest boats are moored in the Applicant's new private slips. (See attachment #3). This does not comply with the IDAPA:

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“Where feasible, all docks, piers, or similar structures must be constructed so as to protrude as nearly as possible at right angles to the general shoreline, lessening the potential infringement on adjacent littoral rights.” ADAPA 20.03.04.015.13.c.i. Typically, littoral right lines extend waterward of the intersection lines between the artificial or ordinary high-water mark and an upland ownership boundary to the line of navigation and will generally be a right angle to the shoreline. IDAPA 20.03.04.010.34.

e. Erosion

Residents have testified at the public hearing as well as at other previous meetings or town hall meetings with Sheriff Norris. They have spoken with passion, frustration and sometimes even anger. Their testimonies tell us of damage to docks, shoreline and water quality, with increasingly exorbitant costs for repairs not reimbursed by the Applicant or public entities. Engineer Sue Stiger testified at the hearing that she has done research on erosion, water movement, water damage, etc. From hearing her testimony, it is clear that added traffic on the river, and the wake and wave effects caused by increased boating and recreation, especially in this narrow, high-concentrated area, would have even greater erosion impacts on the shoreline and negative consequences for the local community. The Judge should carefully consider her testimony of these impacts as part of her analysis.

A compelling point to add in regard to “experts” contributing powerful information to aid in this critical decision and discussion about the erosion impact on our river and shorelines, etc., is that thirteen (13) of Idaho’s most powerful and influential departments did not even give their input in this case. Only three (3) departments sent NO COMMENT. None of their expertise was added, so nothing in the record.

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The Objectors were most surprised that the Sheriff's Office, he supervises the river, responded No Comment. The other surprise was, nothing at all was received from The Army Corps of Engineers; they won't let any work or repairs be done at all until a great amount of waiting, writing (and pleading) has passed, so we expected input from that department as well. We kindly encourage the Judge and Director to take that into account when they consider our evidence and points of view.

IV. CONCLUSION

A portion of IDL's Mission Statement reads, "to provide professional assistance to the citizens of Idaho to use, protect, and sustain their natural resources," with a Vision to "prepare for tomorrow's natural resource challenges." A guiding principle asks, "whether a decision is informed by data and consistent with our policies and procedures." IDAPA standards should align with these ideals.

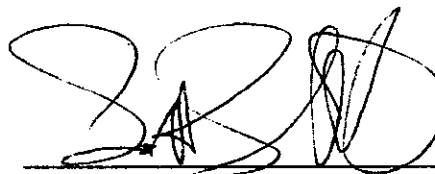
The Applicant claims they have met the IDAPA standards for a commercial marina encroachment permit, arguing the bar is low, requiring only pure determination of whether the public benefit outweighs the detriment. This misinterprets the law. Determining "benefit" and "detriment" involves multiple considerations beyond simple financial gain. Public benefit is not just profit for a private developer, or increased tax revenues or economic benefit for a municipality. Detriment includes impacts on property rights, navigability, safety, and the environment. Here, the public benefit is minimal—adding slips to a popular river, which could actually harm the public interest in the end, as many other over-visited tourist areas around the world have discovered in recent years. Most of the Applicant's cited benefits are, in fact, detriments that, if approved, will lead to further congestion on the Spokane River and be

difficult to reverse. Financial gain for a private party or municipality cannot outweigh the irreversible harm to the public.

For these reasons, the Objectors respectfully request denial of the encroachment permit for 414 PF Hospitality/Marina 33. Specifically, we request that the Applicant be limited to the current number of boat slips and the existing footprint of their encroachment permit. If they were to redesign and renovate within those limits, and the considerations and concerns raised herein, the Objectors would actually celebrate the Applicant's plans, rather than oppose them.

DATED this 14th day of January 2025.

By:



SCOTT SCOFIELD

Objector



SHERYL SCOFIELD

Objector



JOSE JARA

Objector



RICHARD TEICH

Objector

DBA Concerned Citizens Against Additional 100
Boat Slips Added To Templin's Resort On Spokane River

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CERTIFICATE OF MAILING

I hereby certify that on the 14th day of January, 2025, I served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

414 PF Hospitality, LLC Mitch Alhadeff 6710 E. Camelback Rd. Scottsdale, AZ 85251 (480) 315-9595 <i>Applicant</i>	<input type="checkbox"/> U.S. Mail, postage prepaid <input checked="" type="checkbox"/> Email: mitch@bridgerlp.com
Stancraft Scott Hislop Kenzie Ridgewell 2936 W. Dakota Ave. Hayden, ID 83835 (208) 818-6584 <i>Applicant's Agent</i>	<input type="checkbox"/> U.S. Mail, postage prepaid <input checked="" type="checkbox"/> Email: scott.h@stancraft.com kinzie.r@stancraft.com

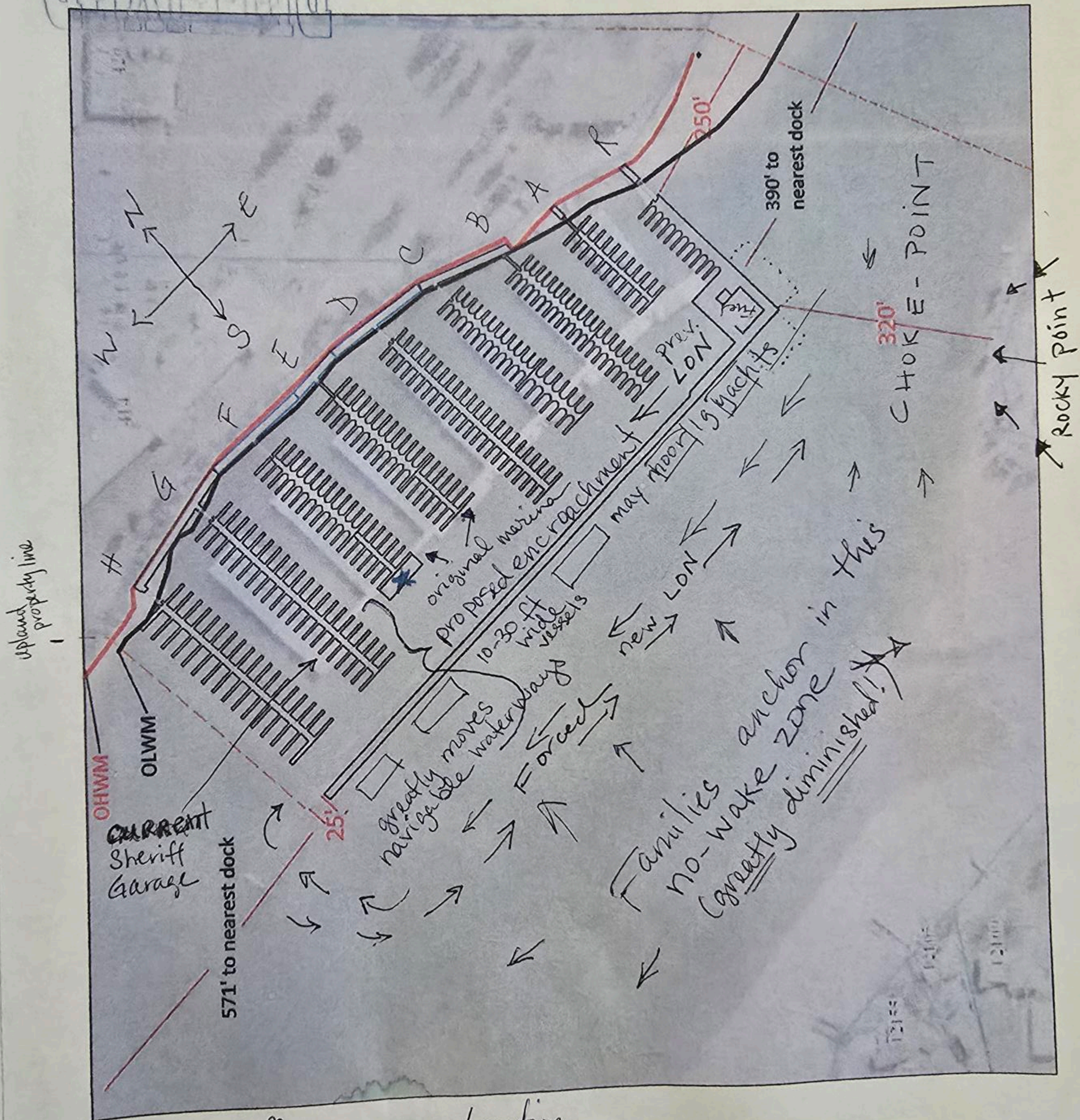
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John Richards, <i>General Counsel for IDL</i> Idaho Department of Lands 300 N. 6th Street Boise, ID 83720 (208) 334-0200	<input type="checkbox"/> U.S. Mail, postage prepaid <input checked="" type="checkbox"/> Email: jrichards@idl.idaho.gov
Marde Messinger Mike Ahmer Rachel King Idaho Department of Lands 300 N. 6th Street Boise, ID 83720 (208) 334-0200 <i>IDL</i>	<input type="checkbox"/> U.S. Mail, postage prepaid <input checked="" type="checkbox"/> Email: mmessinger@idl.idaho.gov mahmer@idl.idaho.gov rking@idl.idaho.gov
Kourtney Romine Idaho Department of Lands PO Box 83720 Boise ID 83720-0050 (208) 334-0200 <i>IDL Workflow Coordinator</i>	<input type="checkbox"/> U.S. Mail, postage prepaid <input checked="" type="checkbox"/> Email: kromine@idl.idaho.gov
OAH General Government Division P.O. Box 83720 Boise, ID 83720-0104 Located at: 350 N. 9th., Suite 300 (208) 605-4300	<input type="checkbox"/> U.S. Mail, postage prepaid <input checked="" type="checkbox"/> Email: filings@oah.idaho.gov

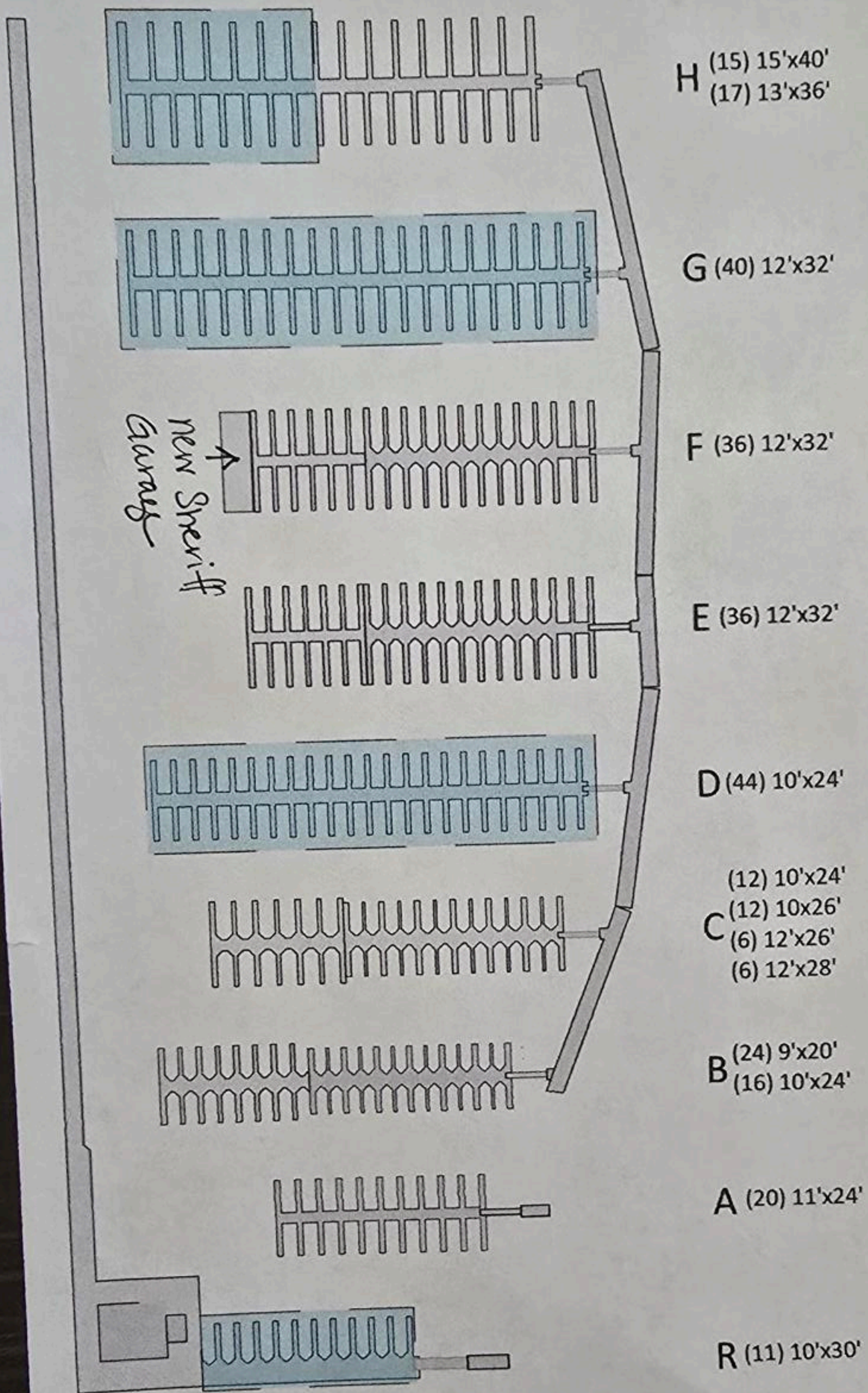
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Attachment 1



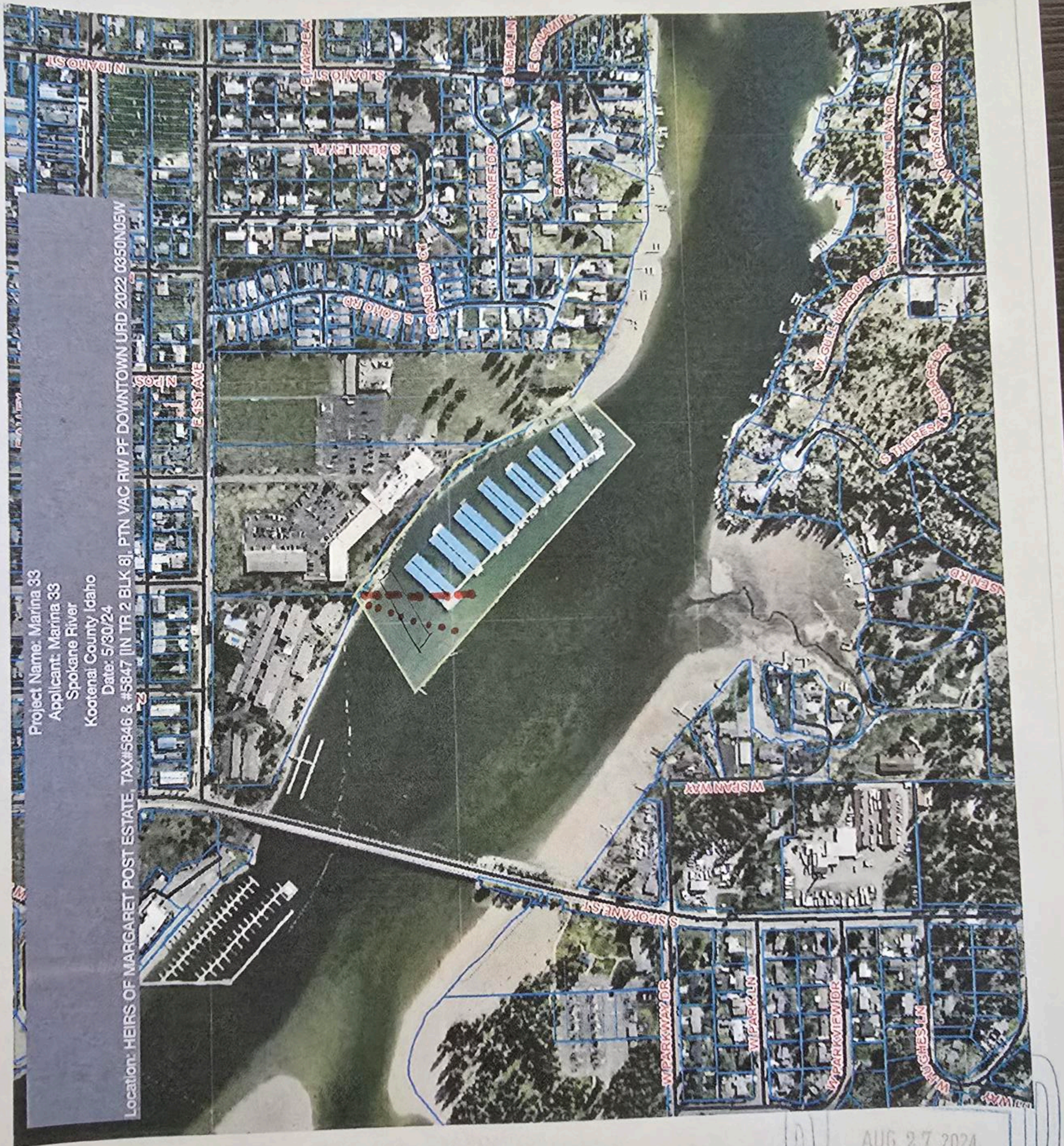
★ Sheriff garage re-location

Attachment 2



Slip Size (ft)	Private	Public	Total
20		24	24
24	44	28	72
24		20	20
26		12	12
26		6	6
28		6	6
30	11		11
32	40	72	112
36	8	9	17
40	7	8	15
Total	110	185	295

Attachment 3



Project Name: Marina 33
 Applicant: Marina 33
 Spokane River
 Kootenai County Idaho
 Date: 5/30/24

Location: HEIRS OF MARGARET POST ESTATE, TAX#5846 & #5847 (IN TR 2 BLK 8), PTN VAC RW PF DOWNTOWN URD 2022 0350N05W

AUG 27 2024

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Pg 20

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Rv