

ARTHUR M. BISTLINE
BISTLINE LAW, PLLC
1205 N. 3rd Street
Coeur d'Alene, Idaho 83814
(208) 665-7270
(208) 665-7290 (fax)
iCourt e-service: service@bistlinelaw.com
ISB: 5216

Attorney for Objector, Williams

IDAHO DEPARTMENT OF LANDS

In the Matter of the Application for
Encroachment L9652863A, for construction of
two boat garages at existing dock,

Patrick Lewis E. Trust,

Applicant.

AGENCY Case No. PH-2026-NAV-20-001

OAH Case No. 26-320-03

OBJECTOR'S WITNESS LIST AND
EXHIBIT LIST

COMES NOW, the Objector, Margaret Williams by and through her attorney of record Arthur M. Bistline of the law firm BISTLINE LAW, PLLC, and hereby files her witness list as follows:

1. Margaret & Kevin Williams, (208)946-7105, 29 Eagle Cove, Sandpoint, ID, 83864. Margaret will testify to her objection she has filed with the Idaho Department of Lands.

Objection, Williams reserves the right to cross-examine any of Applicant's witnesses in this matter. Objector, Williams reserves the right to call additional rebuttal witnesses identified by the Applicant. Objector, Williams reserves the right to supplement this list in advance prior to the hearing.

Objector, Williams submits the following exhibit list:

Exhibit No.	Description	Bates No.
OBJ-W-1	Margaret Williams' objection	1-12

Objector, Williams reserves the right to supplement this list in advance prior to the hearing.

DATED this 13th day of February 2026.


ARTHUR M. BISTLINE
Attorney for Objector, Williams

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 13th day of February 2026, I caused to be served a true and correct copy of the foregoing document to be forwarded, with all required charges prepaid, by the method indicated below, to the following:

Patrick Lewis E. Trust
P.O. Box 14136
Scottsdale, AZ 95267

Sent via email: lew@patrickproperty.com

Bob Presta
CE Kramer Crane and Contracting
46820 Hwy 2
Hope, ID 83836

Sent via email: bob@cekramer.com

Idaho Department of Lands
Amidy Fuson
Marde Mesinger
Rachel King

Sent via email: afuson@idl.idaho.gov
mmensing@idl.idaho.gov
rking@idl.idaho.gov

Kourtney Romine
Kayla Dawson
Idaho Department of Lands
300 N. 6th Street, Ste. 103
Boise, ID 83702

Sent via email : kromine@idl.idaho.gov
kdawson@idl.idaho.gov

OAH
General Government Division
P.O. Box 83720
Boise, ID 83729

Sent via email : filings@oah.idaho.gov
Leslie.hayes@oah.idaho.gov

/s/Nichole Foreman
NICHOLE FOREMAN

STATE OF IDAHO

**DEPARTMENT OF LANDS
ATTACHMENT FOR ENCROACHMENT**

JAN 15 2026

BOAT GARAGE REQUIREMENTS

PEND OREILLE LAKE AREA

General requirements are as follows (IDAPA 20.03.04.015.05):

1. Boat garages are considered nonnavigational encroachments.
2. 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.
3. Existing permitted boat garages may be maintained or replaced with the current square footage of their existing footprint and height.
4. Relocation of an existing boat garage will require a permit.
5. Presumed Adverse Effect. It will be presumed, subject to rebuttal, that single-family and two-family navigational encroachments will have an adverse effect upon adjacent littoral rights if located closer than ten (10) feet from adjacent littoral right lines, and that commercial navigational encroachments, community docks or nonnavigational encroachments will have a like adverse effect upon adjacent littoral rights if located closer than twenty-five (25) feet to adjacent littoral right lines. Written consent of the adjacent littoral owner or owners will automatically rebut the presumption. All boat lifts and other structures attached to the encroachments are subject to the above presumptions of adverse effects.

Please check one and initial:

I have reviewed the application, including the scope and location of the proposed encroachment as depicted. **I consent** to the application and do not wish to participate in a public hearing. _____ (initial)

I have reviewed the application, including the scope and location of the proposed encroachment as depicted. **I object to the application and request a Public Hearing** in which I will be named as an objecting party. I have attached a summary of my objection to this form on a separate page **and a \$75 publication fee**. I UNDERSTAND THAT I AM REQUIRED TO SUBMIT MY CONTACT INFORMATION (NAME, PHONE NUMBER, EMAIL ADDRESS) IN ORDER TO SET A HEARING DATE. _____(initial)

***IF YOU HAVE ANY QUESTIONS PLEASE CONTACT TYLER WARNER, RESOURCE SPECIALIST., AT TWARNER@IDL.IDAHO.GOV OR 208-263-5104 AS SOON AS POSSIBLE.**

1/15/2024
Date

MARGARET R. WILLIAMS, MANAGER, W.H. WILLIAMS FAMILY LLC
Name

29 Eagle Cove Sandpoint ID. 83864
Address City State Zip

208-944-7105 mrwlaw1315@gmail.com
Phone Number Email Address

Idaho Department of Lands
Pend Oreille Lake Supervisory Area
2550 Highway 2 West
Sandpoint, ID 83864-7305
Phone (208) 263-5104
Fax (208) 263-0724



Dustin T. Miller, Director
Working Lands, Trusted Stewards

State Board of Land Commissioners
Brad Little, Governor
Phil McGrane, Secretary of State
Raúl R. Labrador, Attorney General
Brandon D Woolf, State Controller
Debbie Critchfield, Sup't Public Instruction

IDAHO DEPARTMENT OF LANDS

JAN 15 2026

PEND OREILLE LAKE AREA

December 11, 2025

Kevin Chadwick
2365 E Tennessee Ave.
Denver, CO 80209

Ruth Williams
29 Eagle Cove
Sandpoint, ID 83864

Re: Notification of Application for Encroachment L96S2863A

To Whom it May Concern:

This letter is to inform you as a courtesy that your adjacent neighbor **Patrick Lewis E Trust** has applied for a permit with Idaho Department of Lands (IDL) to rebuild two boat garages on Lake Pend Oreille. The enclosed application shows the location, dimensions, and distances to your mutual littoral right line. Because you are immediately adjacent to the proposed project, you are asked to provide your consent or objection by filling out and returning the enclosed forms to IDL within the timelines stated in this letter. **Please review the application and all materials carefully.**

After reviewing the application, if you **do not** have an objection to the proposed project, please check the box(es) indicating your consent, initial, and return.

If you **object** to the proposed boat garage application and would like to **request a public hearing**, in which you will be named as the objecting party, please complete and return the attached form(s) to IDL. State law IDAPA 20.03.04.030.04 requires you submit your written objection(s) (specifically asking for a public hearing) and a **\$75 fee** to cover the cost of publishing notice of hearing **within thirty (30) days of the first date of publication** (the first date it appears in the local newspaper advertising the application). Please ensure the Department receives this information by **January 15, 2026**. Objections should be based on the standards for commercial, community, or nonnavigational encroachments, which can be found here: <https://adminrules.idaho.gov/rules/current/20/200304.pdf>. Failure to provide contact information may result in dismissal of the objection due to strict timelines for hearings.

No response will be considered consent. If you have any questions, please reach out to me directly.

Best,

Tyler Warner
Lands Resource Specialist - Navigable Waters
TWarner@idl.idaho.gov

Enclosures



JAN 15 2026



PEND OREILLE LAKE AREA

0006541640



STATE OF IDAHO
 Office of the secretary of state, Phil McGrane
ANNUAL REPORT AMENDMENT

Idaho Secretary of State
 PO Box 83720
 Boise, ID 83720-0080
 (208) 334-2301
 Filing Fee: \$0.00

For Office Use Only
-FILED-
 File #: 0006541640
 Date Filed: 11/28/2025 3:13:19 PM

Entity Name and Mailing Address:

Entity Name: W. H. WILLIAMS FAMILY L.L.C.
 The file number of this entity on the records of the Idaho Secretary of State is: 0000030469
 Address: 29 EAGLE CV
 SANDPOINT, ID 83864-9600

Entity Details:

Entity Status: Active-Existing
 This entity is organized under the laws of: IDAHO
 If applicable, the old file number of this entity on the records of the Idaho Secretary of State was: W5384

The registered agent on record is:

Registered Agent: MARGARET WILLIAMS
 Registered Agent
 Physical Address: 1132 W ODEN BAY RD
 SANDPOINT, ID 83864
 Mailing Address:

Limited Liability Company Managers and Members

Name	Title	Business Address
Margaret Williams	Manager	1132 W ODEN BAY RD SANDPOINT, ID 83864
Jeffrey Williams	Manager	122 N. 100TH ST. SEATTLE, WA 98133
<input checked="" type="checkbox"/> David Williams	Manager	4210 DOGWOOD HILL RD. SW PORT ORCHARD, WA 98366
<input checked="" type="checkbox"/> Mary Williams	Manager	4880 WEATHERFORD RD FLAGSTAFF, AZ 86001

The annual report must be signed by an authorized signer of the entity.
 Job Title: Manager

Margaret R. Williams _____ 11/28/2025
 Sign Here _____ Date

B1068-0887 11/28/2025 3:13 PM Received by Office of the Idaho Secretary of State

JAN 15 2026

Filed for Record at Request of:
Joseph A. Esposito
Attorney at Law
421 W. Riverside Ave., #960
Spokane WA 99201-0407

PEND OREILLE LAKE AREA

FILED BY
Williams
JAN 12 A 10:37
Ed
SCOTT
COUNTY RECORDER

517258

QUIT CLAIM DEED

DEPUTY

FOR AND IN CONSIDERATION OF LOVE AND AFFECTION, WILLIAM H. WILLIAMS and RUTH B. WILLIAMS, husband and wife, whose address is 221 W. 37th Ave., Spokane WA 99203, do hereby convey, release, remise and forever quit claim unto the W H. WILLIAMS FAMILY L.L.C., the address of which is 3595 W. Oden Bay Rd., Sandpoint ID 83864, the following described premises, to-wit:

See Exhibit "A" Attached Hereto

the real property address commonly known as 3595 W. Oden Bay Rd., Sandpoint ID 83864,
together with their appurtenances.

DATED this 30th day of December, 1997.

William H. Williams

WILLIAM H. WILLIAMS

Ruth B. Williams

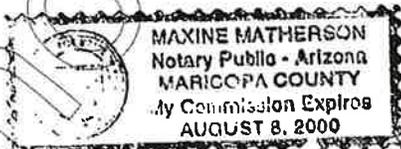
RUTH B. WILLIAMS

STATE OF ARIZONA

County of Maricopa) ss.

On this day personally appeared before me WILLIAM H. WILLIAMS and RUTH B. WILLIAMS, husband and wife, know to be the individuals who executed the within and foregoing instrument, and acknowledged to me that they signed the same as their free and voluntary act and deed for the uses and purposes therein mentioned.

DATED this 30th day of December, 1997.



Maxine Matherson
Notary Public in and for the State of Arizona,
residing at: Chandler Bay
My commission expires: Aug 8, 2000

JAN 15 2026

PEND OREILLE LAKE AREA

W.H. Williams, LLC
29 Eagle Cove
Sandpoint, Idaho
83864

Kevin Chadwick
2365 E Tennessee Ave.
Denver, CO 80209

Dated: January 15, 2026

RE: Objection to Application for Boat Garages and Dock Modification
Lake Pend Oreille – Lew Patrick Trust, Permit #: L96S2863A

To Whom It May Concern:

We submit this letter as a formal objection to the application seeking approval to install two boat garages on the applicant's existing dock on Lake Pend Oreille.

1. Existing Dock Size Violation and Noncompliance

The applicant's dock was originally permitted at 700 square feet. During the 2025 summer season, the dock was expanded to approximately 900 square feet through the addition of roughly 200 square feet of decking. This was a clear violation of the existing permit. This expanded decking area configuration remained in place throughout the summer.

Although the applicant removed the additional decking a few weeks prior to filing the current application, the metal framing supporting the expanded dock footprint remains in place, and the removed decking is currently stacked on the dock. The timing of the removal of the decking and application for the boat garages strongly suggests an effort to temporarily mask a noncompliant dock configuration immediately prior to seeking further authorization.

IDL should consider the applicant's documented history of noncompliance when evaluating the present request. IDL should also consider that the materials submitted in support of the application do not accurately depict the existing dock configuration. The dock diagram provided by the applicant reflects the permitted 700-square-foot dock footprint, but does not account for the remaining metal framing supporting the expanded configuration, the blocked kayak slips, or the recently removed additional decking stored on the dock that is ready for reinstallation to expand the dock back to the 900 square feet as soon as boat garage permits are secured.

IDL regulations require that permit applications be accurate and complete so that the Department may evaluate existing conditions and the full scope of impacts to public trust resources. Because the application is based on drawings and representations that materially understate the existing and readily restorable noncompliant dock footprint, it is misleading and does not provide IDL with an adequate basis for review. As a result, the application should be deemed incomplete and void, or, at a minimum, denied.

2. Prohibition on New Boat Garages on Lake Pend Oreille

IDL rules governing Lake Pend Oreille expressly prohibit new boat garages except in narrow circumstances not applicable here. IDAPA 20.03.04.015.05(b) provides that applications for permits to construct new boat garages will not be accepted, except to support local emergency services.

The applicant's property has no existing permitted boat garage. The proposal – whether framed as relocation or reuse – would result in the creation of not one, but two new boat garages on this site.

3. Improper Attempt to Relocate and Aggregate Boat Garages

It is our understanding that the applicant has acquired multiple boat garages from other properties on Lake Pend Oreille. For purposes of this objection, and without conceding the point, we assume that the two boat garages the applicant proposes to place on this site were lawfully permitted and constructed on separate properties under separate dock permits. Even under that assumption, the applicant's proposal is not permissible.

The applicant asserts that because the two proposed boat garages were lawfully permitted on other properties, they are therefore eligible for relocation to this site. This framing misunderstands the scope, intent, and limitations of the original permits.

Each of the two boat garages was permitted as an accessory structure to a separate dock on a specific parcel. Neither permit authorized, contemplated, or evaluated the placement of two boat garages on a single residential dock or site. The permits were site-specific and use-specific, tied to the scale, visual impact, and overwater encroachment of an individual dock – not transferable components that may be combined to create a more intensive use elsewhere. Under IDAPA 20.03.04, relocation of an overwater structure does not permit an increase in the number of structures, intensity of use, or cumulative overwater impacts at a single site, and previously permitted structures may not be recombined to create a configuration that was never reviewed or approved.

Relocating both garages to a single property would fundamentally alter the intensity and character of shoreline development that was originally reviewed and approved. In effect, the applicant is attempting to convert two distinct, limited approvals into a single, more impactful shoreline installation, something that was never evaluated under the original permits and would not be permissible if proposed as new construction.

That the applicant proposes to place the garages on opposite sides of the dock does not cure this defect. IDL evaluates shoreline impacts by site and cumulative overwater encroachment, not by whether structures are physically connected. The result is still two enclosed boat garages occupying public trust waters at a location where no boat garage has ever been permitted.

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PEND OREILLE LAKE AREA

4. Excessive Visual, Structural, Shoreline and Overwater Impacts Inconsistent with Lake Pend Oreille Standards

The applicant's property has never historically supported a boat garage, let alone two. The proposed construction would therefore represent a fundamental change in the character and intensity of shoreline development at this site, rather than the continuation of an existing, lawfully established use.

Two covered boat garages on a single residential dock would create a visually dominant, large-scale installation that is out of proportion to surrounding development and plainly inconsistent with the scenic values of Lake Pend Oreille. Unlike open slips or uncovered docks, enclosed boat garages introduce substantial vertical mass, solid wall planes, and rooflines that block shoreline views, interrupt sightlines across the water, and create the appearance of a private boathouse complex extending into public waters.

The resulting impacts include, but are not limited to:

- A dramatic increase in visual bulk and structural mass over state-owned submerged lands.
- Permanent obstruction of natural shoreline views from the water and neighboring properties.
- Increased overwater shading and physical encroachment; and
- A marked escalation in the privatization and enclosure of public trust waters.

These impacts are not merely incremental. The proposal would introduce enclosed overwater structures where none have ever existed, resulting in an intensification of private use that is excessive, unnecessary, and incompatible with the lake's scenic and recreational character.

Lake Pend Oreille is subject to heightened regulatory scrutiny precisely because of its exceptional natural beauty and public value. Allowing two covered boat garages on a single residential dock would set a precedent that normalizes bulky, enclosed shoreline structures and undermines the very standards IDL is charged with enforcing.

5. Public Trust Doctrine Considerations

Lake Pend Oreille is held by the State of Idaho in trust for the benefit of the public. Under public trust doctrine, IDL has an affirmative duty to protect public interests in navigation, recreation, and scenic enjoyment. Allowing construction of two new boat garages on a single residential dock – particularly following documented noncompliance – would improperly expand private use of state-owned submerged lands at the expense of these public trust values.

6. Conclusion

For the reasons set forth above, the application should be denied in its entirety. The proposal

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PEND OREILLE LAKE AREA

relies on a dock with a documented history of noncompliance, seeks approval for boat garages expressly prohibited by rule, improperly attempts to aggregate previously permitted structures to intensify private use of public trust waters, and would result in excessive visual and overwater impacts inconsistent with Lake Pend Oreille's heightened regulatory standards.

Attached hereto and incorporated by reference are the following materials, which further document these concerns:

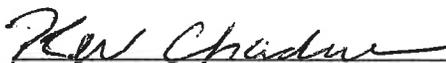
- A satellite image showing the dock built as originally permitted.
- A satellite image showing the expanded dock configuration in place during the 2025 summer season; and
- Photographs showing the remaining metal framing and stacked decking currently present on the dock.

Thank you for your consideration.

Dated: 01/15/2026



Margaret R. Williams, Manager
W.H. Williams Family LLC
29 Eagle Cove
Sandpoint, Idaho 83864



Kevin Chadwick
2365 E Tennessee Ave.
Denver, Colorado 80209

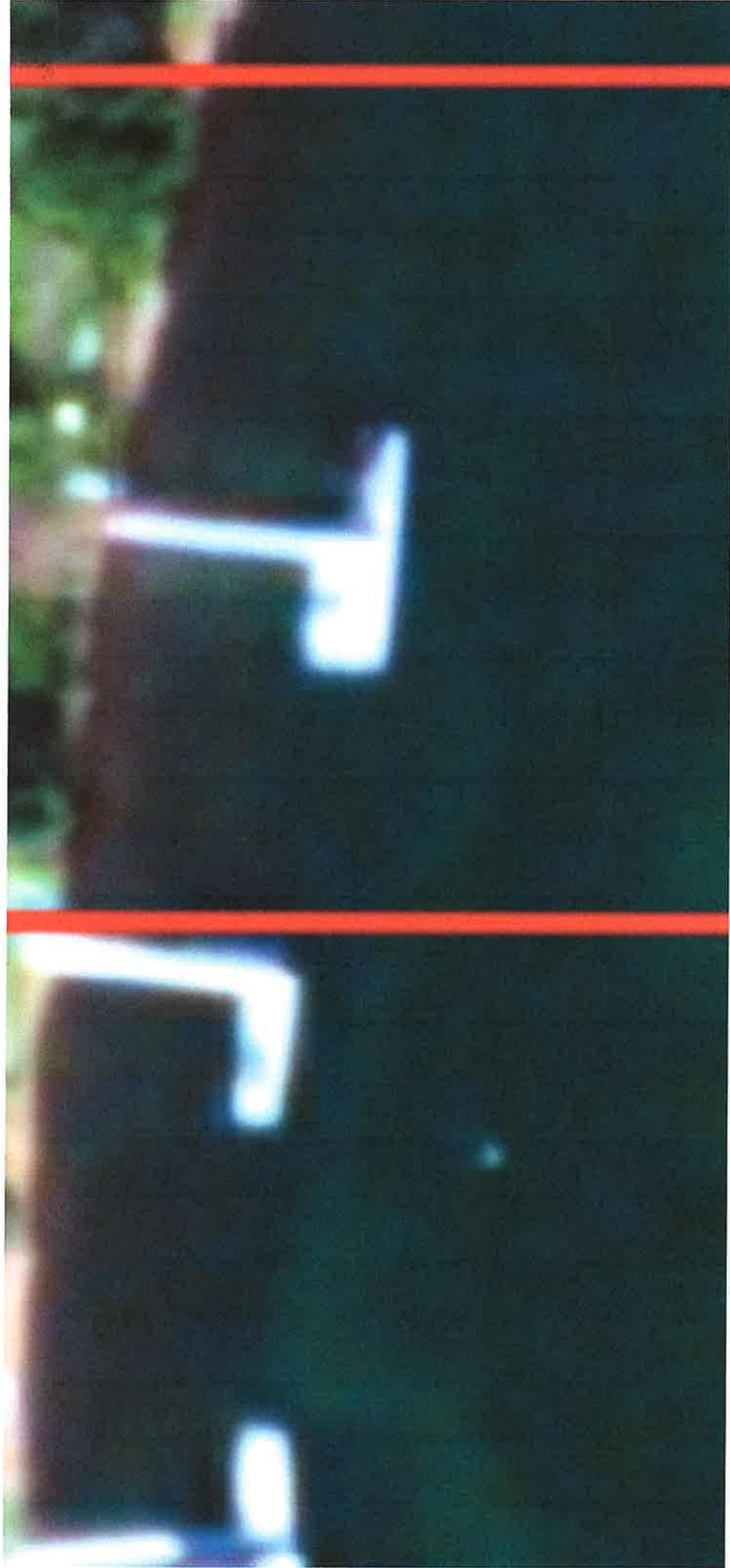
JAN 15 2026

PEND OREILLE LAKE AREA



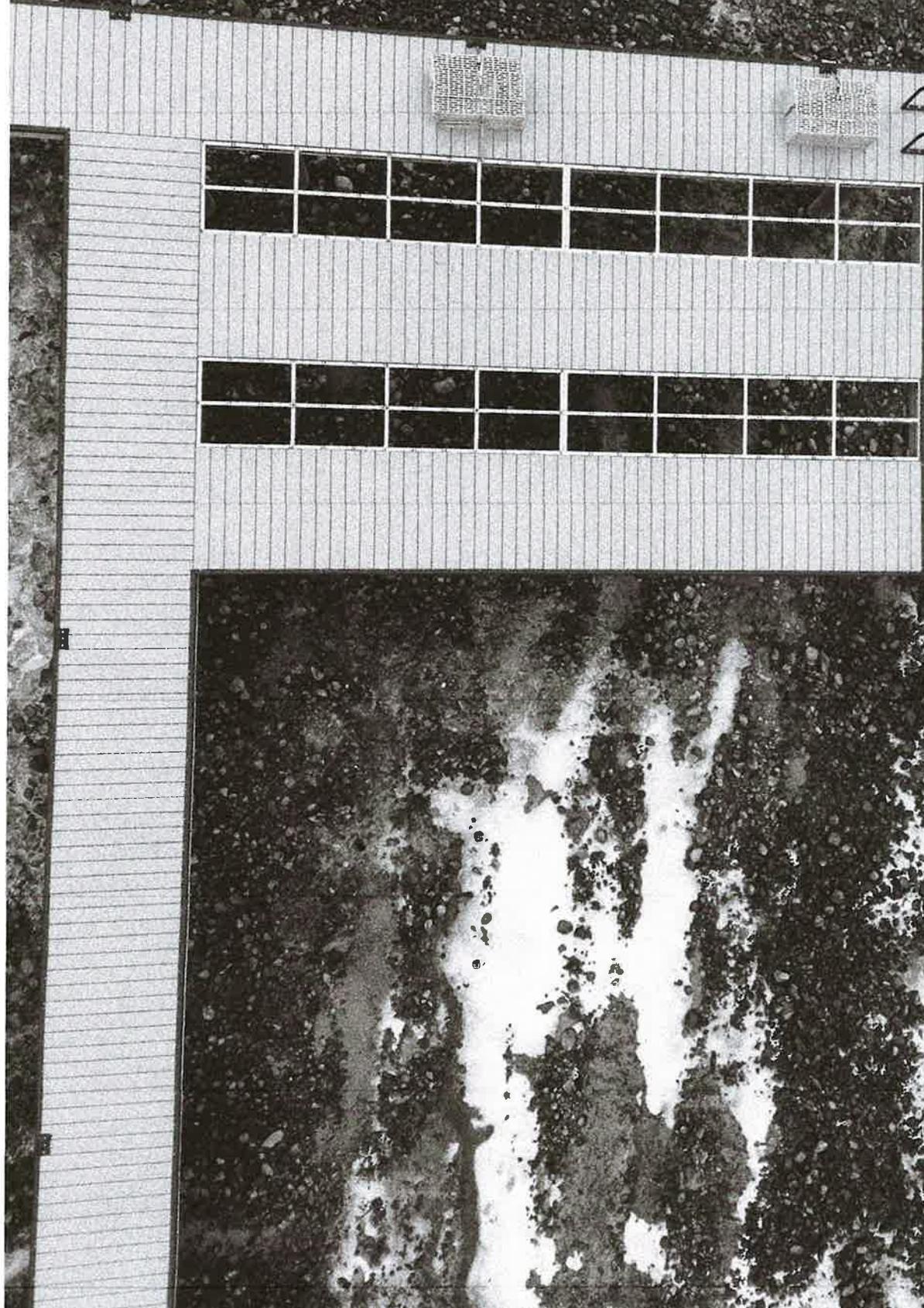
JAN 15 2026

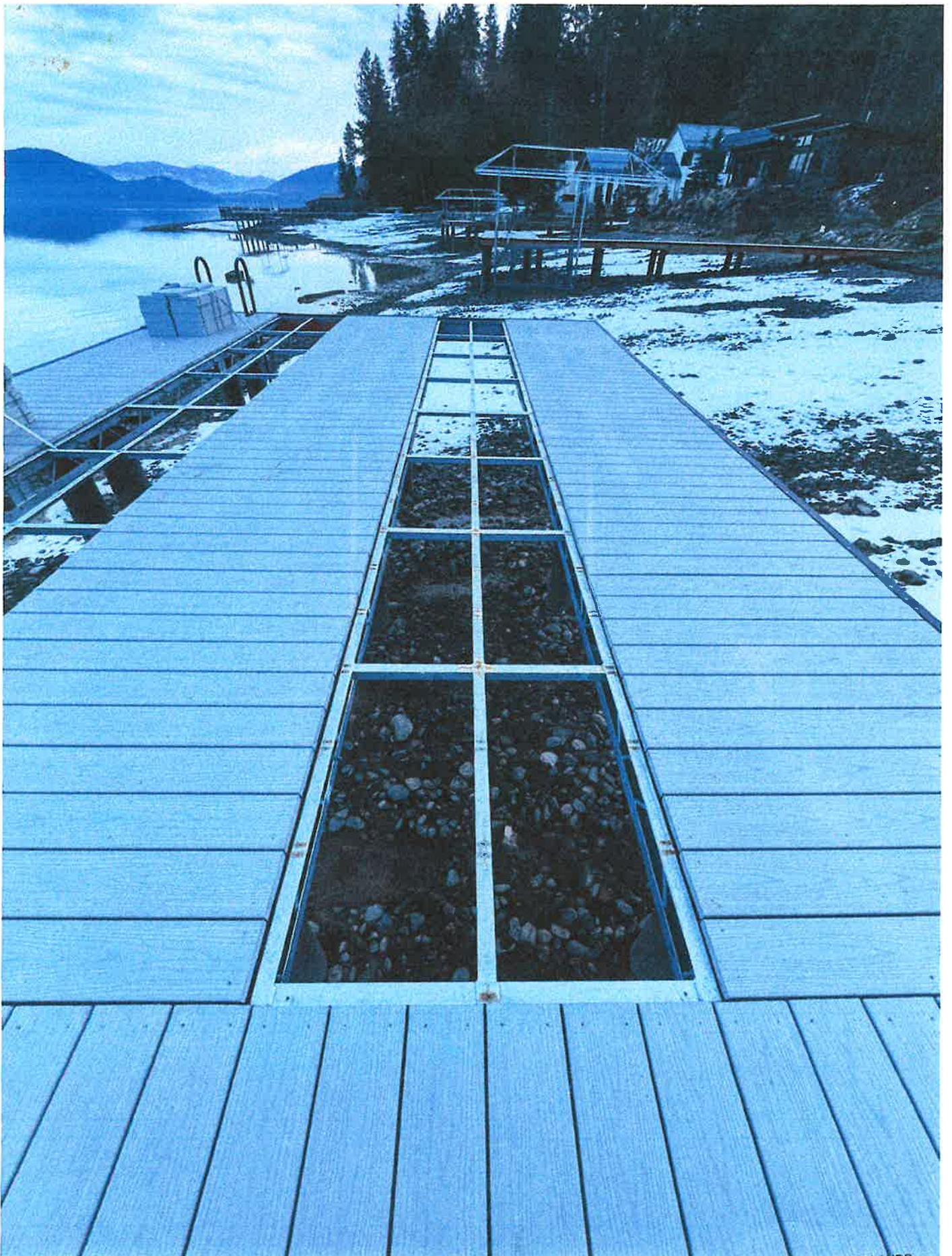
END OREILLE LAKE AREA



JAN 15 2026

PEND Oreille Lake Area





IDAHO DEPARTMENT OF LANDS

JAN 15 2026

Exhibit 1
PEND OREILLE LAKE AREA
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