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AFFIDAVIT OF BRANT STEIGERS

AFFIDAVIT OF BRANT STEIGERS - 1

exhibits attached to this affidavit are true, correct and complete copies of the documents represented to be contained therein.

3.) Attached to this affidavit as Exhibits A-1 and A-2 are copies of aerial photographs located in Potlatch's records showing a portion of Potlatch's lands in Township 43 North, Range 2 East, B.M. During my employment with Potlatch, I have visited some or all of the lands shown in these photographs and attest that these photographs accurately depict lands owned by Potlatch. These photographs are two of many in Potlatch's records of aerial photography that are regularly made, kept, and used to document the condition of Potlatch's lands. Such photographs, including those in Exhibits A-1 and A-2, are regularly produced in the ordinary course of Potlatch's business and not in anticipation of trial. I located the originals of the photographs in Exhibits A-1 and A-2 in good condition where I expected to find them in Potlatch's photograph repository in the basement of the Potlatch office building at 301 D Street, Suite A, Lewiston, ID 83535.

4.) The photographs in Exhibits A-1 and A-2 show, among other things, roads on Potlatch lands used to access Potlatch's forest lands for logging purposes. Exhibit A-1 shows lands and roads located to the south of those shown in Exhibit A-2, with the main road shown leaving the top-center of Exhibit A-1 being the same main road entering the bottom-left of Exhibit A-2. Two recently harvested clear-cuts are visible near the upper-center of the photograph in Exhibit A-2.

5.) The photographs in Exhibits A-1 and A-2 each contain a date stamp of "9-9-70", which corresponds to the September 9, 1970 date the photographs were taken. This method of date-stamping each photo is consistent with the procedures I have witnessed in the 20 years of working with aerial photographs with Potlatch. Exhibit A-1 contains an identifying code "PFI-

70 309-A3-5", and Exhibit A-2 contains an identifying code "PFI-70 309-A2-3", which correspond to the project name, flight path, and photo numbers of the flight path. "PFI" stands for Potlatch Forests, Inc., the name of the corporation before a name change to Potlatch Corporation. "-70" corresponds to the year of the photo collection project. The identifying codes on the photographs correspond to markings and information contained in a document entitled "Index to 1970 Aerial Photos" which is included in Potlatch's files with the photographs.

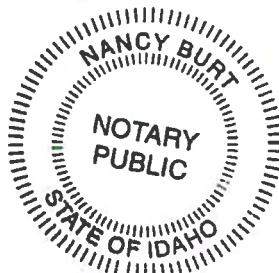
6.) I have marked with arrows on the photographs in Exhibits A-1 and A-2 the locations of the points of diversion claimed for water right no. 92-10878. Water diversions are made where the logging road crosses the stream, allowing a water truck to access the stream with a suction hose. (The red circle in the center of the photographs is a standard marking on all of the original photographs in this collection.)

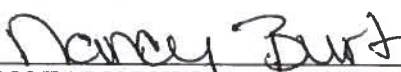
7.) Potlatch's normal operating practices require the use of water for industrial and fire protection uses associated with logging roads and logging activities including, without limitation, truck washing, dust abatement, chemical application, and fire suppression. Based on the roads and logging activities shown in the photographs in Exhibits A-1 and A-2, it is reasonable to infer that water was diverted from the claimed point of diversion for industrial and fire protection purposes at least as early as the date of the photograph (September 9, 1970).

DATED this 11 day of September, 2014.


BRANT STEIGERS

SUBSCRIBED AND SWORN to before me this 11th day of September, 2014.




NOTARY PUBLIC FOR IDAHO
Residing at Clarksville, WA
Commission expires: 6-22-19

PF1-70 309-A3-5

9-70



92-10878
Diversion Site



92-10878 Diversion Site

Exhibit A-2

92-10878
Diversion Site



PFI-70 92-10878

9-9-70