

3.) Attached to this affidavit as Exhibit A is a copy of an aerial photograph previously located in Potlatch's records, but that was donated to the University of Idaho in 2013 where it currently resides. Exhibit A shows a portion of Potlatch's lands in Township 45 North, Range 3 East, B.M. During my employment with Potlatch, I have visited some or all of the lands shown in this photograph and attest that this photograph accurately depicts lands owned by Potlatch. This photograph is one of many previously and currently maintained 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 the one in Exhibit A, are regularly produced in the ordinary course of Potlatch's business and not in anticipation of trial. I located the original of the photograph in Exhibit A in good condition where I expected to find it in the Archives section of the University of Idaho Library on the Moscow, Idaho campus. Portions of Potlatch's aerial photography collection, including the photograph in Exhibit A, were donated to the University of Idaho Library in September 2013.

4.) The photograph in Exhibit A shows, among other things, roads used to access Potlatch's forest lands for logging purposes, specifically in the lower left and lower right of the photograph.

5.) The photograph in Exhibit A contains a date stamp of "8-26-69", which corresponds to the August 26, 1969 date the photograph was taken according to the procedures specified in the aerial photo collection contract (a copy of which is on file at Potlatch). The photograph also contains an identifying code "PFI-69 126-X2-3", which corresponds to the project name, flight path, and photo number of the flight path. "PFI" stands for Potlatch Forests, Inc., the name of the corporation before a name change to Potlatch Corporation. "-69" corresponds to the year of the photo collection project.

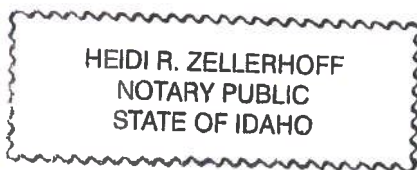
6.) I have marked on the photograph in Exhibit A the location of the point of diversion claimed for water right no. 91-7726. Water diversions are made where the logging road crosses the stream, allowing a water truck to access the stream with a suction hose. I did not make the handwritten notation on the photograph that apparently was intended to depict the corners of Sections 25, 36, 30, and 31, but that does not appear to be accurate.

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 photograph in Exhibit A, 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 (August 26, 1969).

DATED this 17 day of November, 2014.


BRANT STEIGERS

SUBSCRIBED AND SWORN to before me this 17 day of November, 2014.




NOTARY PUBLIC FOR Idaho
Residing at CK, WA
Commission expires: 06/06/2018

101 304.83

PFI-69 126-X2

26-69

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Exhibit A

91-7726
Diversion Point

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