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**IN THE DISTRICT COURT OF THE FIFTH JUDICIAL DISTRICT
OF THE STATE OF IDAHO, IN AND FOR THE COUNTY OF TWIN FALLS**

In Re CSRBA

Subcase No. 91-7724

Case No. 49576

**AFFIDAVIT OF
BRANT STEIGERS**

STATE OF IDAHO)
 ss.
County of Nez Perce)

BRANT STEIGERS, being first duly sworn upon oath, deposes and says as follows:

1. I am a Land Use Forester for Potlatch Corporation, and its subsidiary companies Potlatch Forest Holdings, Inc., Potlatch Land and Lumber, LLC, and Potlatch TRS Idaho, LLC (collectively, "Potlatch"), the claimants of water rights in the Coeur d'Alene-Spokane River Basin Adjudication.

2. I have personal knowledge of the facts herein and make this affidavit based on such personal knowledge and the records in my possession. All 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 Exhibit A-1 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-1 shows a portion of Potlatch's lands in Township 45 North, Range 2 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-1, 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-1 in good condition where I expected to find it in the Archives section of the University of Idaho Library on the Moscow, Idaho campus.

4. The photograph in Exhibit A-1 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-X1-14", 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.

5. Attached to this affidavit as Exhibit A-2 is a copy of an aerial photograph available for download from the USGS web site: <http://earthexplorer.usgs.gov>. The unique identification code assigned to this photograph is AR1VCAF00010024. Exhibit A-2 shows a portion of Potlatch's lands in Townships 44 and 45 North, Range 2 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.

6. The photograph in Exhibit A-2 contains a date stamp of "7-5-68" which, based on my experience with similar photographs, corresponds to the July 5, 1968 date the photo was taken.

7. The photographs in Exhibit A-1 and Exhibit A-2 shows, among other things, roads and skid trails used to access Potlatch's forest lands for logging purposes.

8. I have marked on the photographs in Exhibit A-1 and Exhibit A-2 the locations of the points of diversion claimed for water right no. 91-7724 in SWSW Sec. 4, T44N, R2E, and NENE Sec. 33, T45N, R2E, respectively. Water diversions are made where the logging roads cross the stream, allowing a water truck to access the stream with a suction hose. The point of diversion in SWSW Sec. 4 is near the same location as the dam and pond at historical "Camp 3" which, as described in "Land Use History: Mica Creek, a tributary of the St. Joe River" by Rosemarie Shultz (2000) (in the record for this subcase), is where a narrow gauge railroad transported logs to the head of a historical log flume.

9. 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 Exhibit A-1 and A-2, it is reasonable to infer that water was diverted from the claimed point of diversion into water trucks for industrial and fire protection purposes at least as early as the date of the photograph in Exhibit A-1 (August 26, 1969).

DATED this 22 day of May, 2016.

Brant Steigers
BRANT STEIGERS



SUBSCRIBED AND SWORN to before me this 23rd day of May, 2016.

Robin Christensen
NOTARY PUBLIC FOR Idaho
Residing at Clarkston, WA
Commission expires: 1-6-2018

Exhibit A-1

91-7724
Diversion Point



DFK-69 126-X1-1

8-26-69

7-5-68

1-24

GS-VCAF

Exhibit A-2

91-7724
Diversion Point

