





cropland tract is approximately  $\frac{3}{4}$  miles directly north of the furthest north Voigt hayfield in Section 31 and approximately three stream miles downstream.

4. That subirrigation, if present, would have been more likely in the Section 19/30 cropland tract rather than in Section 31 or any upstream areas to the south due to increased surface water contribution from two large drainages supplying surface water to Coyote Creek in the middle of Section 30. One of the drainages is located on the east side of Coyote Creek and the other drainage is located on the west side of Coyote Creek. Additionally, ground water contribution to the base flow of Coyote Creek would also be increased the further one travels downstream along Coyote Creek to the north. Both surface water and ground water contributions to Coyote Creek between the Section 31 alfalfa fields to the south and the Section 19/30 cropland tract to the north would increase the alluvial ground water levels downgradient (to the north) thereby significantly increasing the chances that subirrigation is occurring within the valley.
5. That based on the Reclamation Division's specific examination of vegetation and soils in the Section 19/30 field, subirrigation was not occurring.
6. That the 1978 OSM infrared remote imagery, specifically Casey Voigt Exhibit No. 18, encompassing Coyote Creek (photograph 291) depicts relative moisture content of vegetative growth within areas along Coyote Creek in addition to other adjacent upland areas, specifically the S1/2 of Section 29 and the NE1/4 of Section 32 which are approximately 130-150 feet above the elevation of Coyote Creek valley. These areas are readily observable on the exhibit and are located on uplands between one-half to one mile east of the Voigt alfalfa fields in Section

31. Cropland in the S1/2 of Section 29 and the NE1/4 of Section 32 are not underlain by alluvial soils and therefore cannot be subirrigated, and neither are the other upland areas on the map showing red coloration. Areas depicted as pink or red on the infrared imagery do not specifically depict areas of subirrigation.

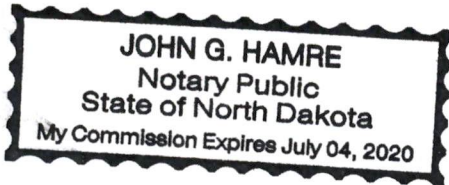
7. That additional satellite imagery submitted by both Mr. Norris and Dr. Bickel in their affidavits, if allowed as evidence, clearly shows a significant amount of upland cropland areas with actively growing vegetation (red colored areas) at the same time as the areas along Coyote Creek.
8. That page 1 of the 1985 OSM Guidelines - *Reconnaissance Maps to Assist in Identifying Alluvial Valley Floors*, Casey Voigt Exhibit No. 2, states that the objective of the study was *“to develop an understanding, from a regional perspective, of the types of stream valleys that may be studied further for consideration as alluvial valley floors.”* Continuing narrative on page 1 of the guidelines states that *“These maps represent only a reconnaissance-level effort in identification of areas which are likely to meet this definition, and these areas, therefore, are called potential alluvial valley floors.”* Further narrative on page 1 states that *“Because reconnaissance level data have been used in this study, it is recognized that detailed data collected for any specific area may more conclusively prove or disprove the alluvial valley floor findings made in this report.”*

9. That the detailed data collected and reviewed by environmental consultants and the Reclamation Division staff produced no discernible or defensible evidence that the valley of Coyote Creek is an AVF.

Dated this 2<sup>nd</sup> day of March 2015

Bruce Beechie  
Bruce E. Beechie

Subscribed and sworn before me  
this 2<sup>nd</sup> day of March, 2015.



John G. Hamre  
Notary Public