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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

NATIONAL WILDLIFE FEDERATION, et al.,

Plaintiffs,

v.

NATIONAL MARINE FISHERIES SERVICE, et al.,

Defendants.

Case No.: 3:01-CV-00640-SI

FEDERAL DEFENDANTS' NOTICE RE: EXHIBITS USED AT THE JUNE 23, 2015 SUMMARY JUDGMENT HEARING

Pursuant to the Court's request at the June 23, 2015, summary judgment hearing, Federal Defendants attach as exhibits the graphics and visual aids used during the hearing. *See* Exhibits 1-6 (containing a brief description of the source of or information presented in the graphics, followed by the graphics).

Dated June 30, 2015

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CERTIFICATE OF SERVICE

I certify that on June 30, 2015, the foregoing was electronically filed through the Court's electronic filing system, which will generate automatic service upon on all Parties enrolled to receive such notice. I also certify that the following will be manually served via overnight mail:

Dr. Howard F. Horton, Ph.D.
U.S. Court Technical Advisor
Professor Emeritus of Fisheries
Department of Fisheries and Wildlife
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Corvallis, Oregon, 97331-3803
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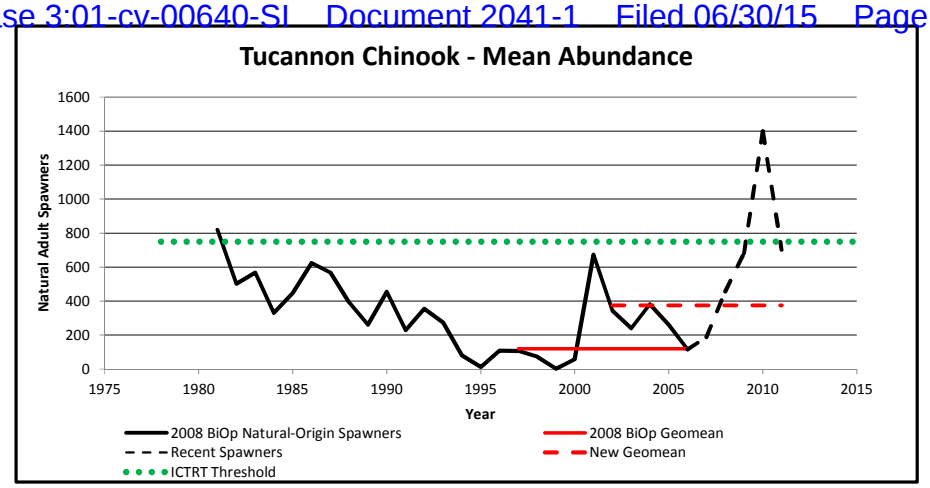
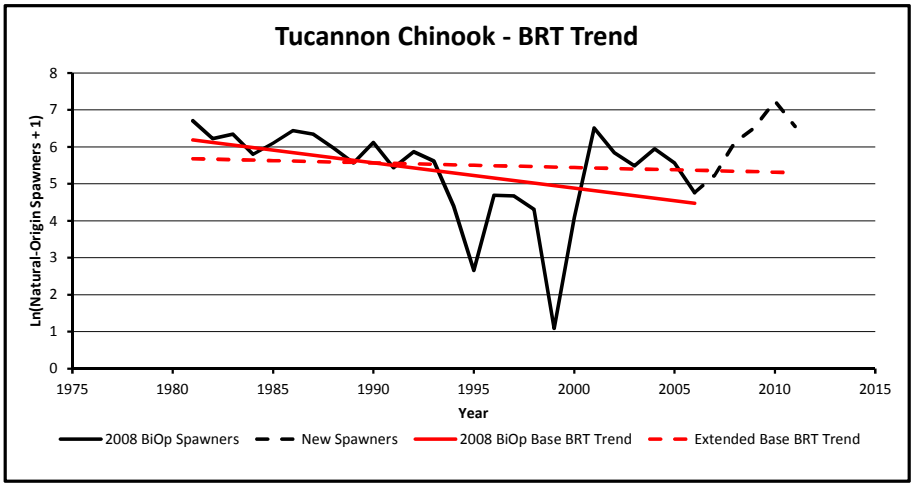
/s/ Michael R. Eitel
Michael R. Eitel
Trial Attorney, USDOJ

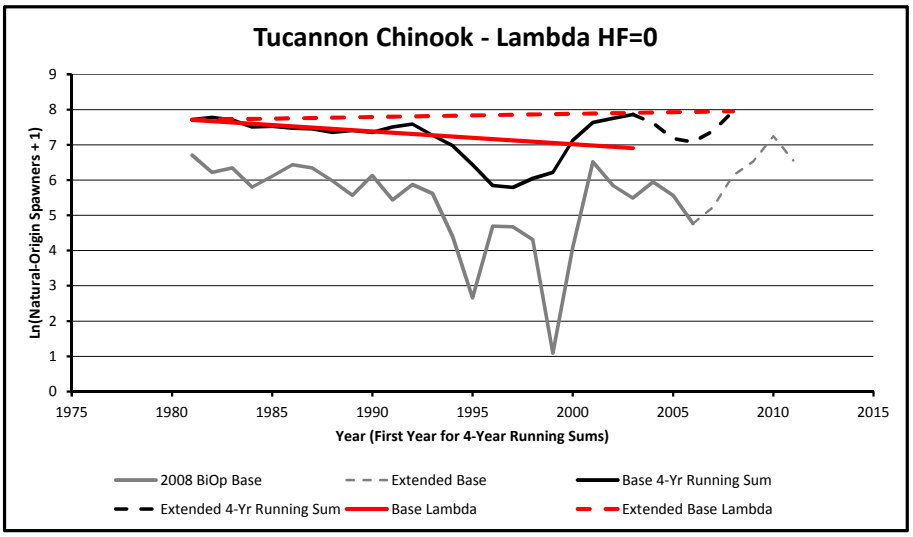
EXHIBIT 1

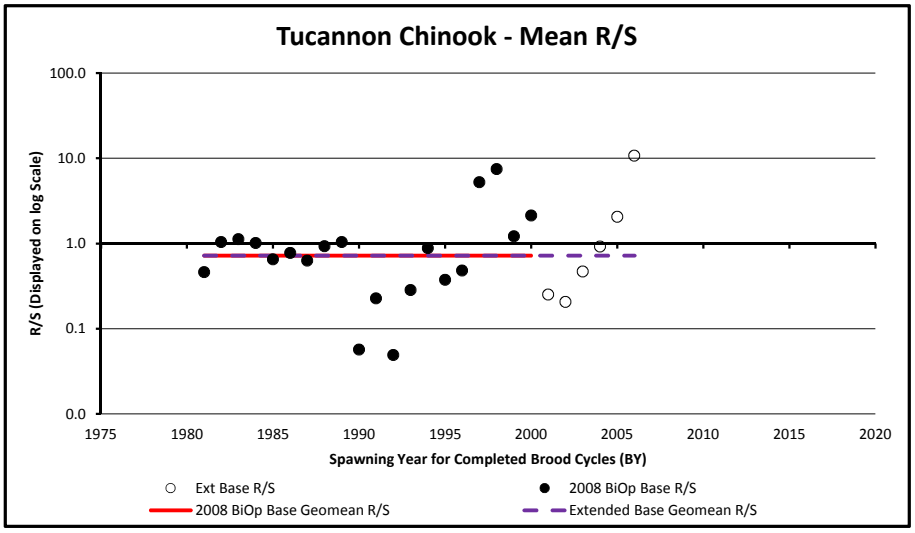
Tucannon Population of Snake River spring/summer Chinook. Figures 2.1-4, 2.1-5, 2.1-6, 2.1-8, and 2.1-9 from the 2014 Supplemental Biological Opinion (note: Figure 2.1-4 supplemented to include the Interior Columbia Technical Recovery Team's recovery abundance threshold).

[2014 NOAA A1 at 57-65]









2014 BiOp at 57-63

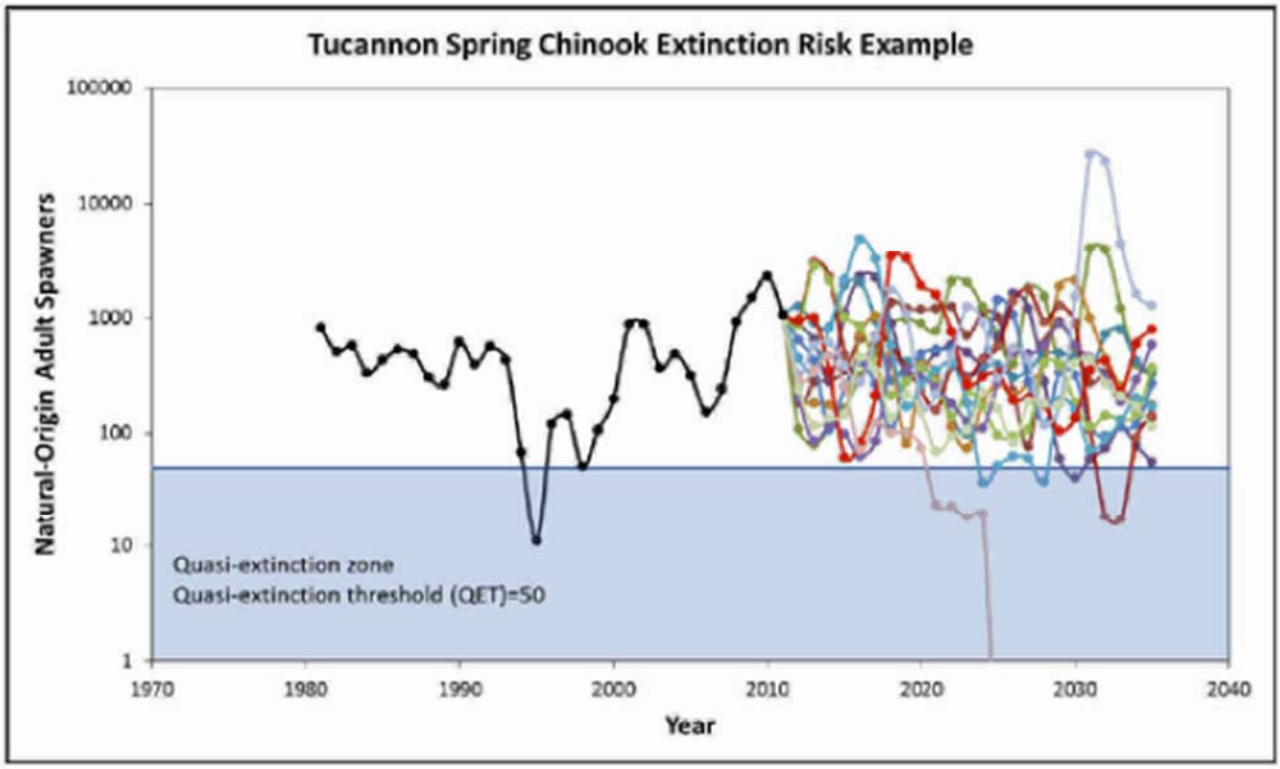


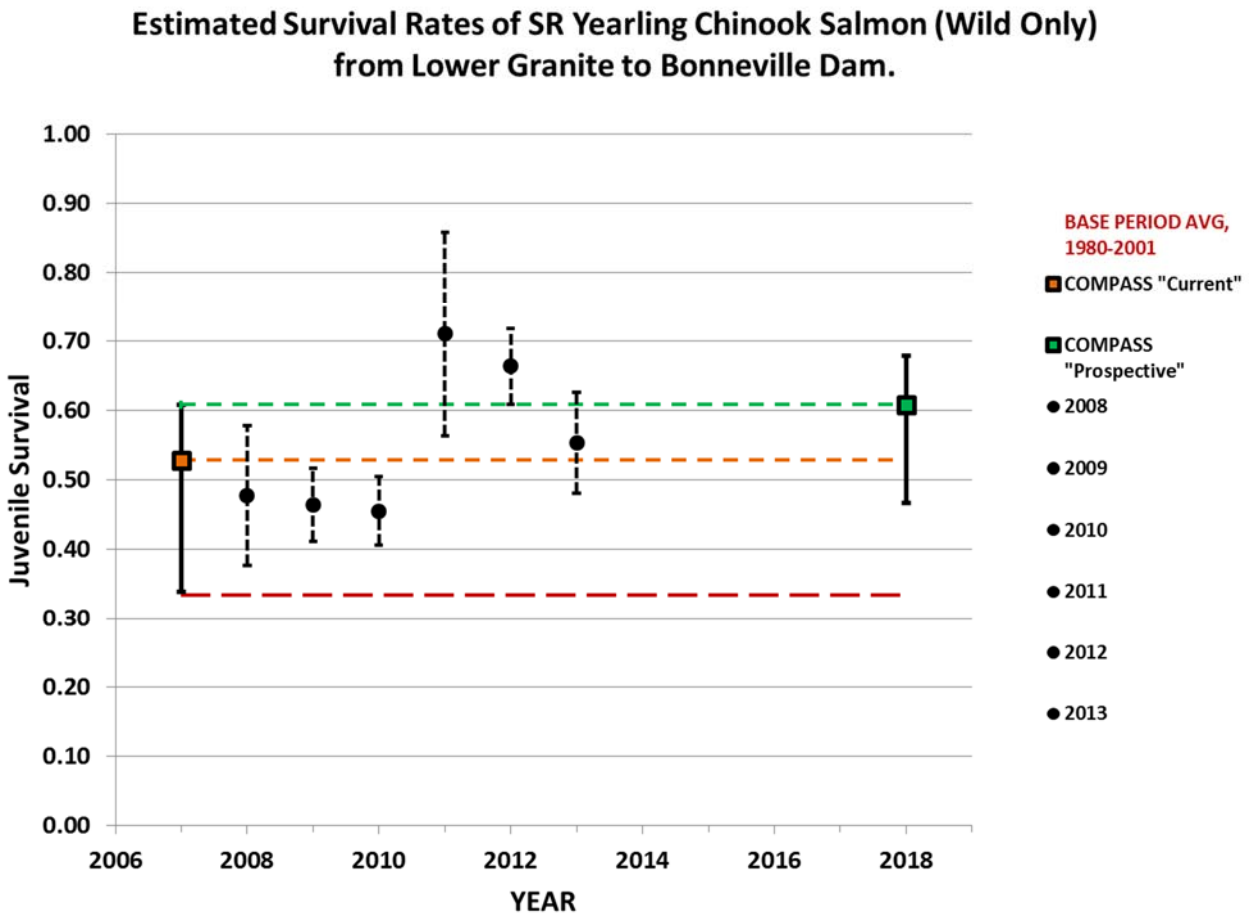
Figure 2.1-9 Example of method used to calculate the quasi-extinction risk of the Tucannon River Chinook population, from Hinrichsen (2013; included as Appendix B in this Supplemental Opinion). The black line indicates empirical estimates of adult spawners through 2012. Fourteen simulations of abundance from 2013–2037 (24 years) are shown in various colors. One of these simulations drops below a QET of 50 fish for four consecutive years, so for this simulation the population is considered "extinct." The risk of 24-year extinction shown in this example is 7% (1/14); the estimate we use for this Supplemental Opinion is 3%, based on thousands of simulations (Table 2.1-7).

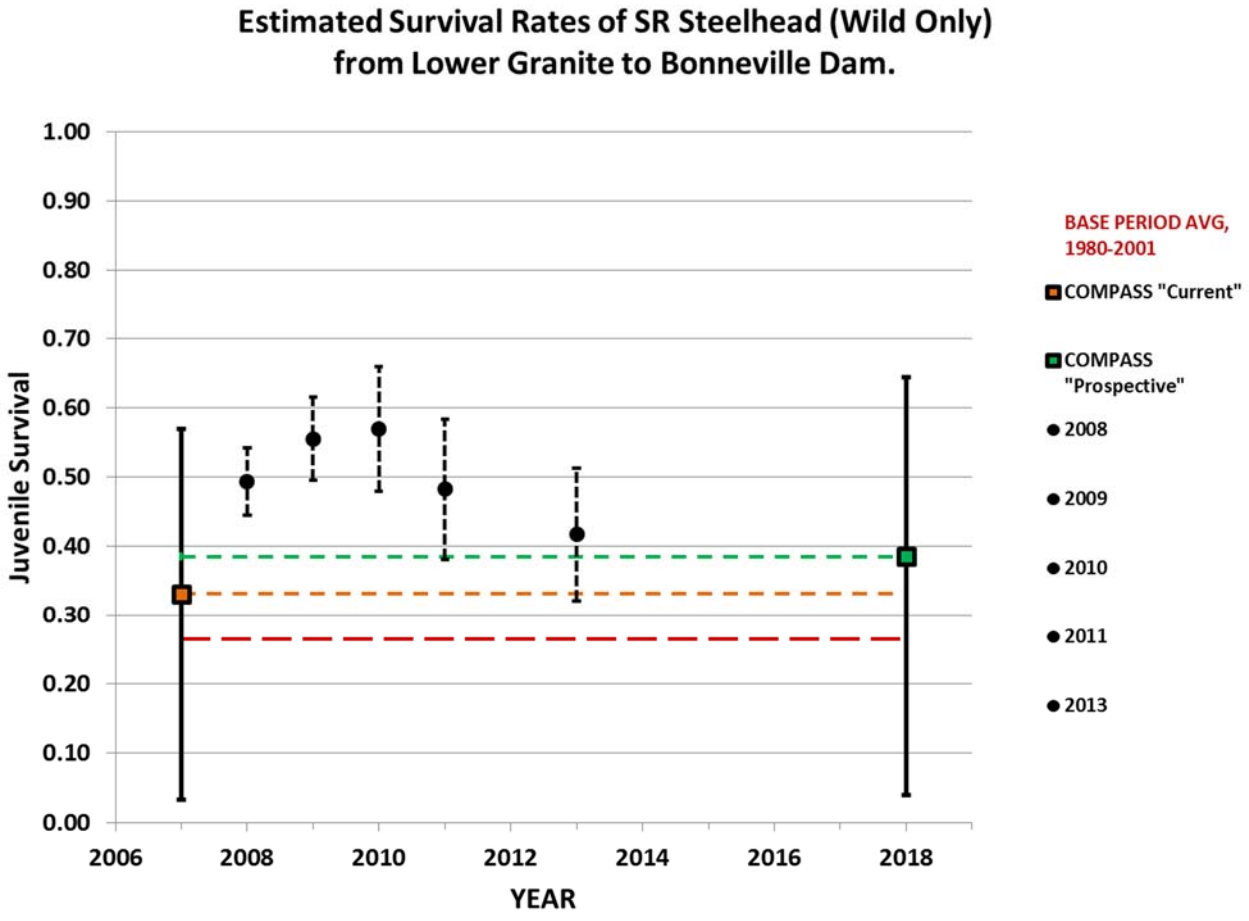
2014 BiOp 65

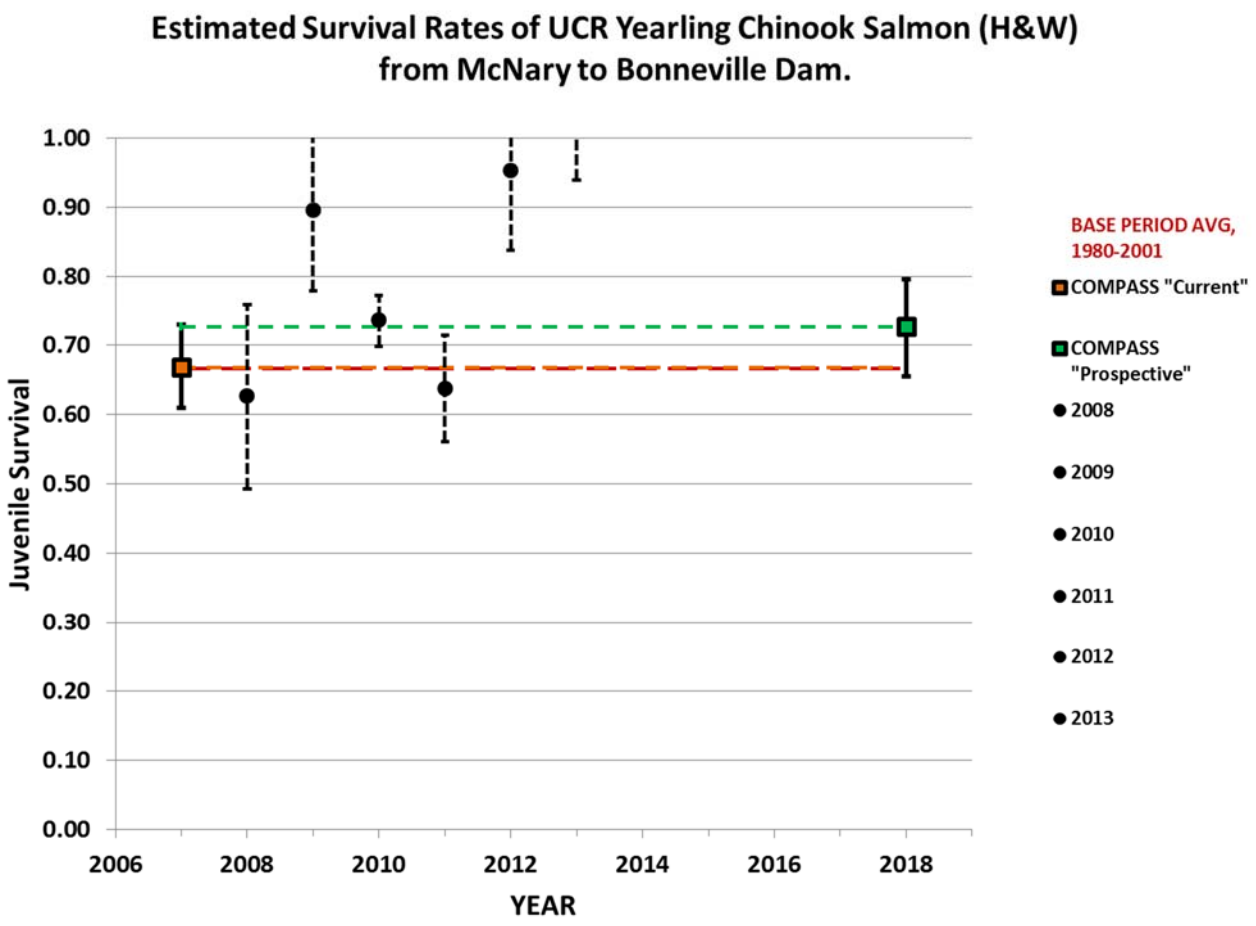
EXHIBIT 2

Reach survival for Snake River yearling Chinook salmon (wild), Snake River steelhead (wild), Upper Columbia River yearling Chinook (hatchery and wild), and Upper Columbia River steelhead (hatchery and wild). Figures 3.3-2, 3.3-3, 3.3-4, and 3.3-5 from the 2014 Supplemental Biological Opinion

[2014 NOAA A1 at 364-35]


Estimated Survival Rates of SR Yearling Chinook Salmon (Wild Only)
from Lower Granite to Bonneville Dam.
Juvenile Survival
1.00
0.90
0.80
0.70
0.60
0.50
0.40
0.30
0.20
0.10
0.00
2006
2008
2010
2012
2014
2016
2018
YEAR
BASE PERIOD AVG, 1980-2001
COMPASS "Current"
COMPASS "Prospective"
2008
2009
2010
2011
2012
2013


Estimated Survival Rates of SR Steelhead (Wild Only)
from Lower Granite to Bonneville Dam.
Juvenile Survival
1.00
0.90
0.80
0.70
0.60
0.50
0.40
0.30
0.20
0.10
0.00
2006
2008
2010
2012
2014
2016
2018
YEAR
BASE PERIOD AVG, 1980-2001
COMPASS "Current"
COMPASS "Prospective"
2008
2009
2010
2011
2013


Estimated Survival Rates of UCR Yearling Chinook Salmon (H&W) from McNary to Bonneville Dam.
Juvenile Survival
1.00
0.90
0.80
0.70
0.60
0.50
0.40
0.30
0.20
0.10
0.00
2006
2008
2010
2012
2014
2016
2018
YEAR
BASE PERIOD AVG, 1980-2001
COMPASS "Current"
COMPASS "Prospective"
2008
2009
2010
2011
2012
2013

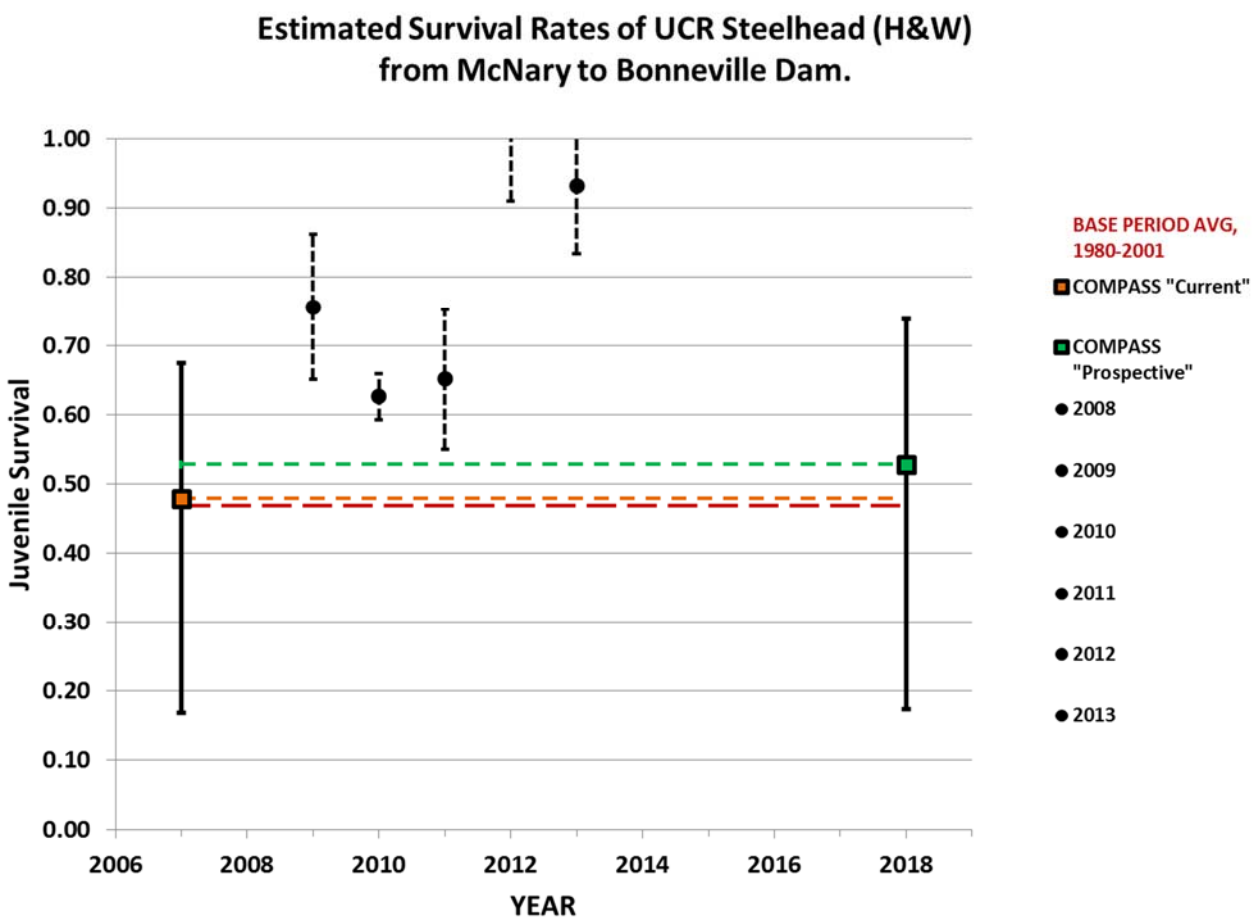
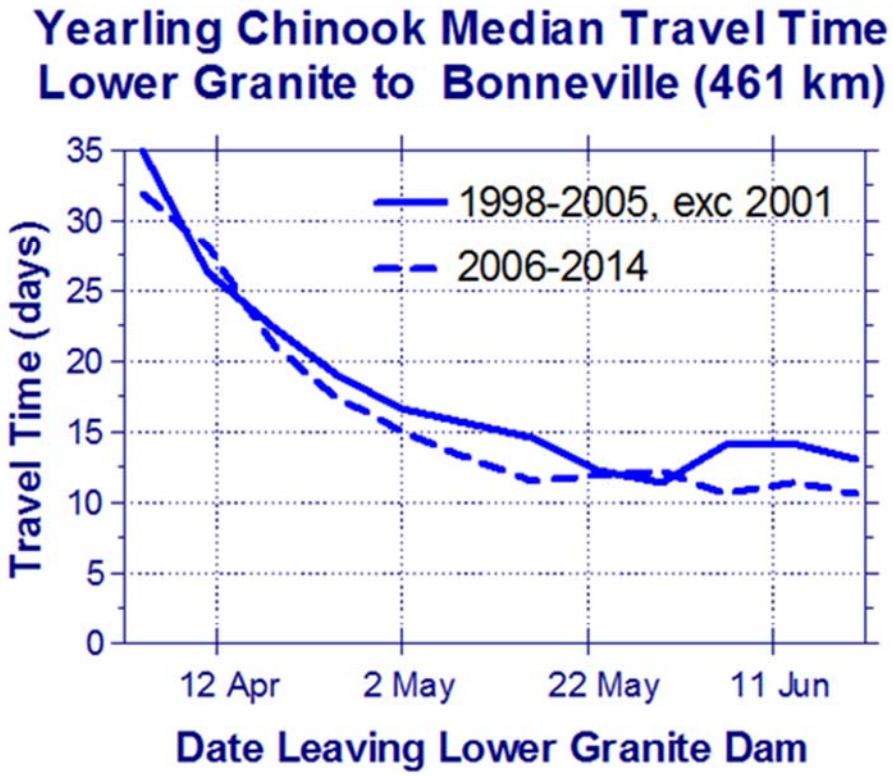
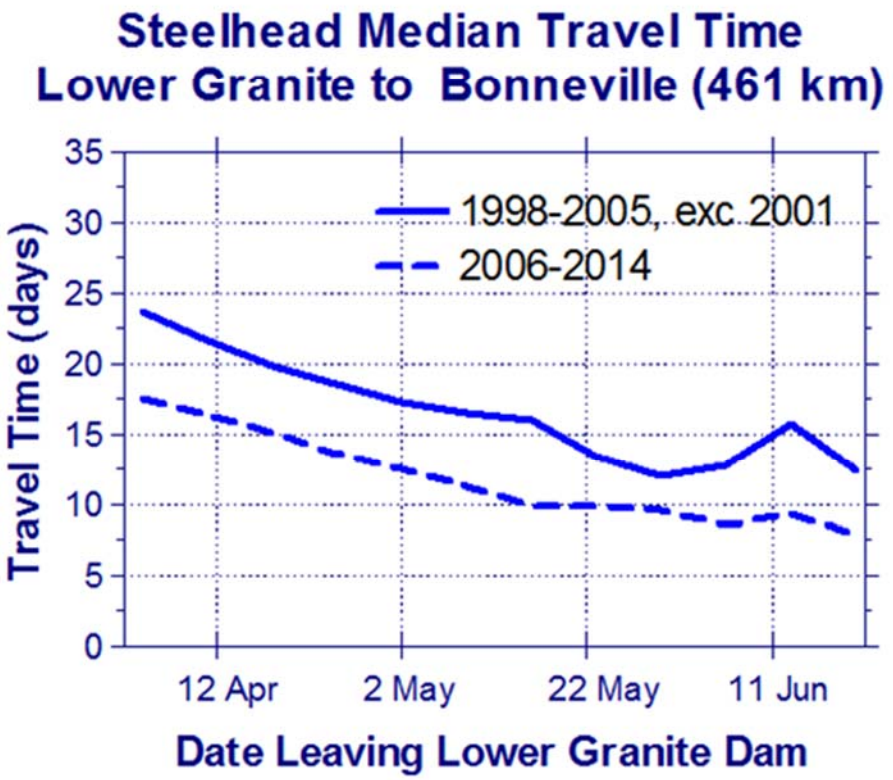

Estimated Survival Rates of UCR Steelhead (H&W) from McNary to Bonneville Dam.
Juvenile Survival
1.00
0.90
0.80
0.70
0.60
0.50
0.40
0.30
0.20
0.10
0.00
2006
2008
2010
2012
2014
2016
2018
YEAR
BASE PERIOD AVG, 1980-2001
COMPASS "Current"
COMPASS "Prospective"
2008
2009
2010
2011
2012
2013

EXHIBIT 3

Demonstrative graphics of juvenile yearling Chinook and steelhead travel time (containing updated information from 2014 NOAA C32881:275224-25 and 2014 NOAA B114:9253); Juvenile yearling Chinook and steelhead median travel times during recent low flow years (data and information from 2014 NOAA C4011:72845).

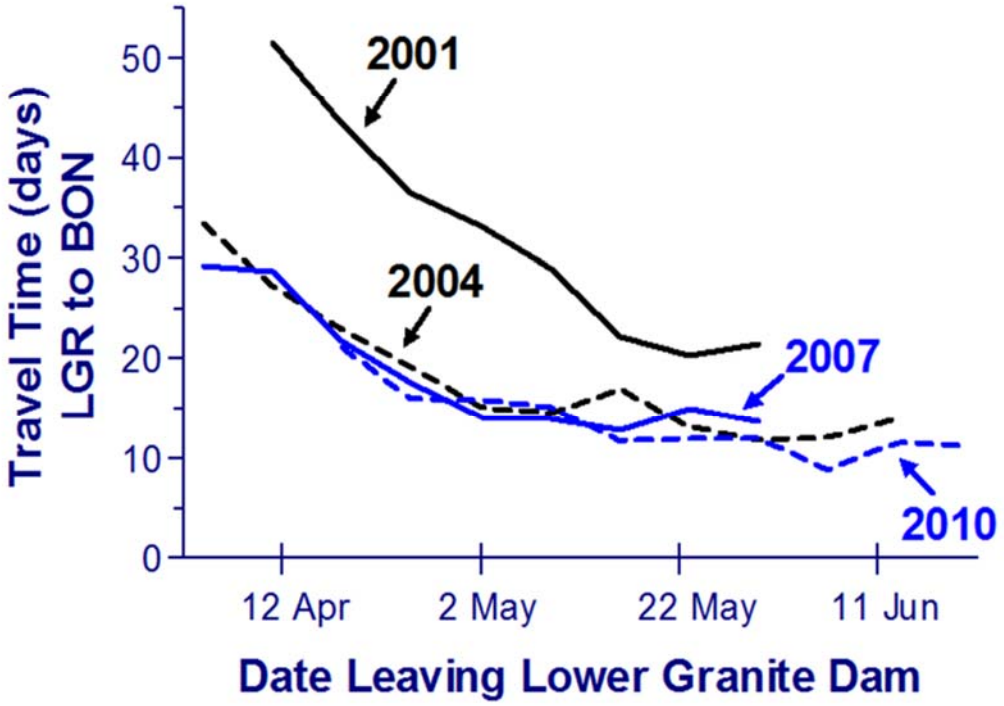
2006-2014 vs 1998-2005



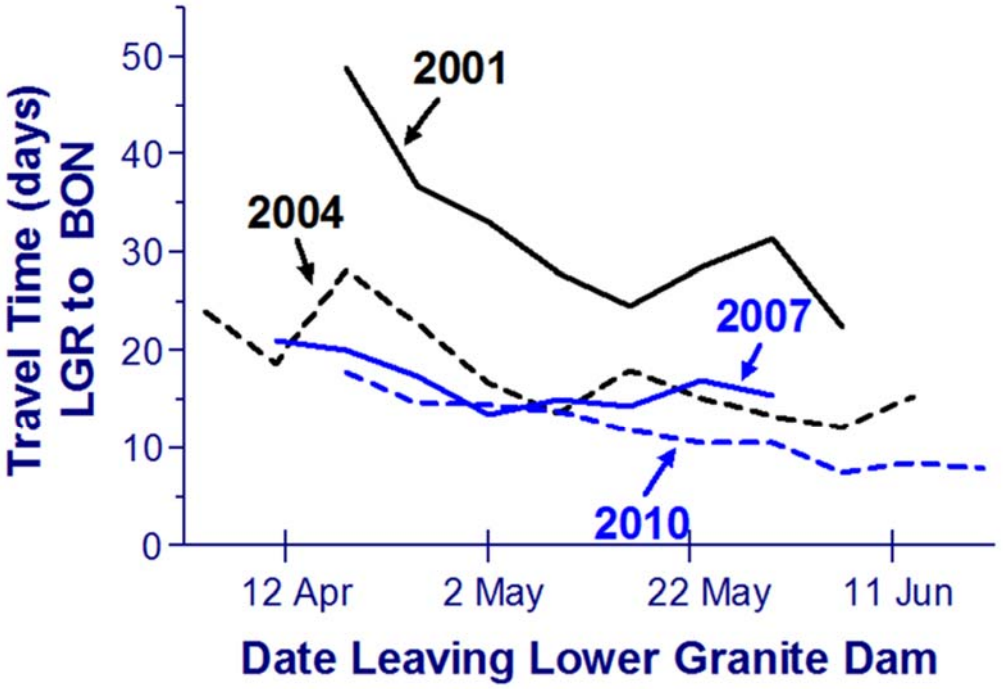


Updated from NOAA
C32881:275224-25;
B114:9253

Yearling Chinook Median Travel Time During Recent Low Flow Years



Steelhead Median Travel Time During Recent Low Flow Years



Source: C4011:72845

EXHIBIT 4

Overview of tributary habitat restoration projects in the Columbia basin. Map generated from www.cbfish.org/link.mvc/to/aprmap2007to2014 (last visited June 30, 2015). *See* Declaration of Michael Tehan ¶ 9 & n.4, Maps 1-2 (ECF 2006).

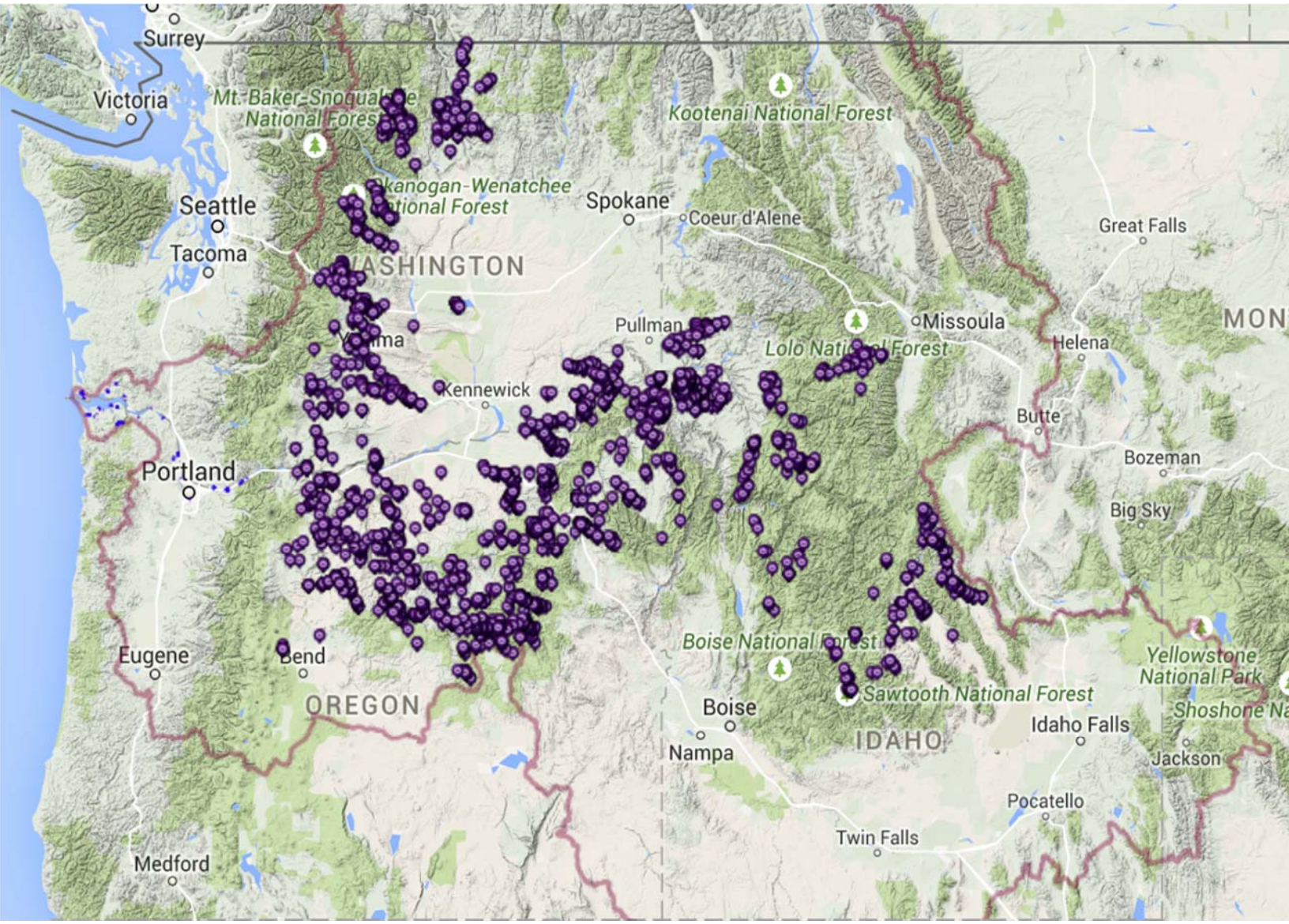
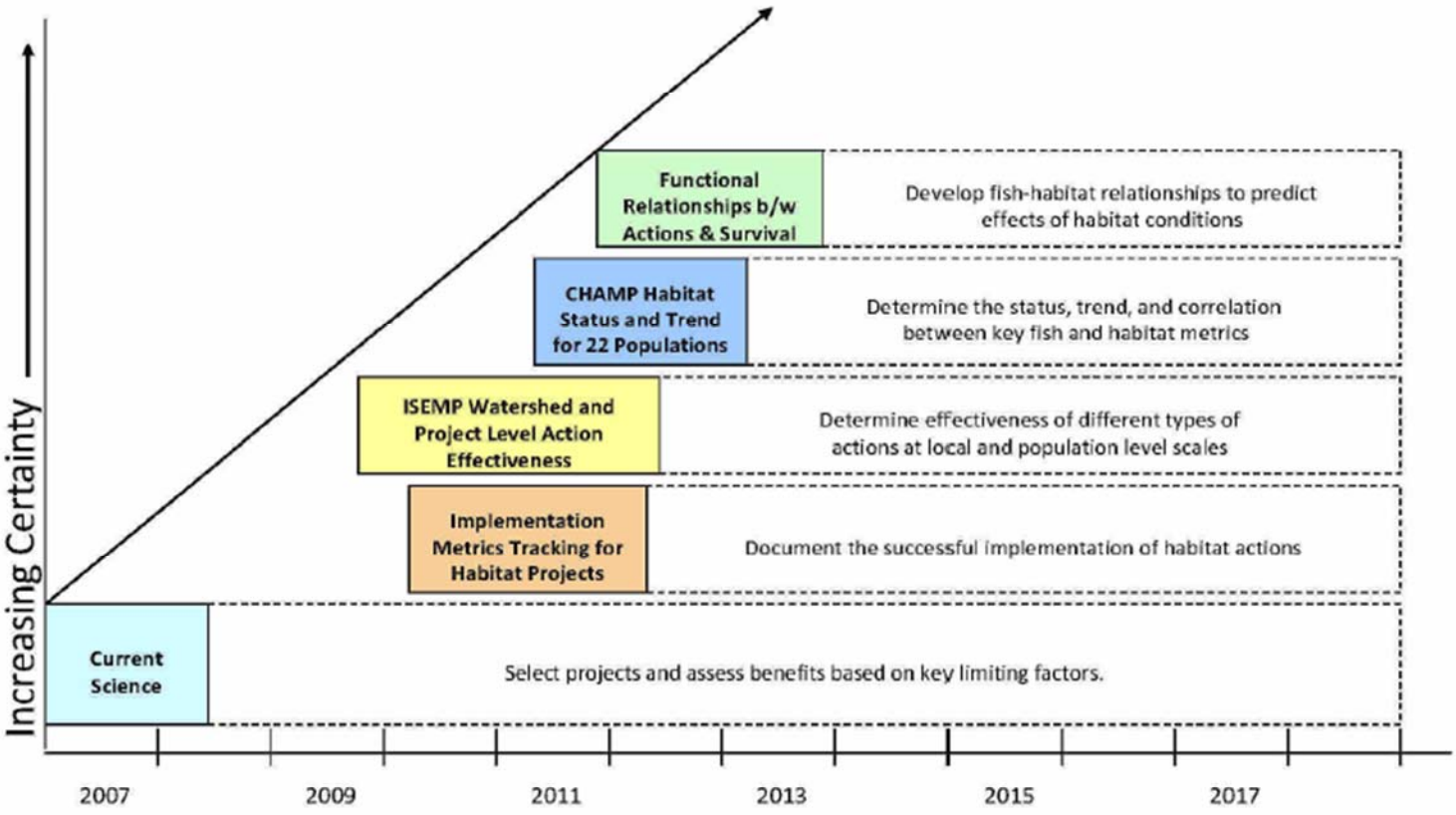

Surrey
Victoria
Mt. Baker-Snoqualmie National Forest
Kootenai National Forest
Okanogan-Wenatchee National Forest
Seattle
Spokane
Coeur d'Alene
Great Falls
Tacoma
WASHINGTON
Pullman
Missoula
Lolo National Forest
Helena
Yakima
Kennewick
Butte
Bozeman
Portland
Big Sky
Boise National Forest
Yellowstone National Park
Eugene
Bend
Sawtooth National Forest
OREGON
Boise
Idaho Falls
Shoshone National
IDAHO
Nampa
Jackson
Pocatello
Twin Falls
Medford

EXHIBIT 5

Graphic of the building blocks for the tributary habitat Research, Monitoring, and Evaluation (RM&E) program,

[2014 NOAA B32:2357 (Columbia Basin Tributary Habitat Improvement: A Framework for Research, Monitoring and Evaluation (2013a))].

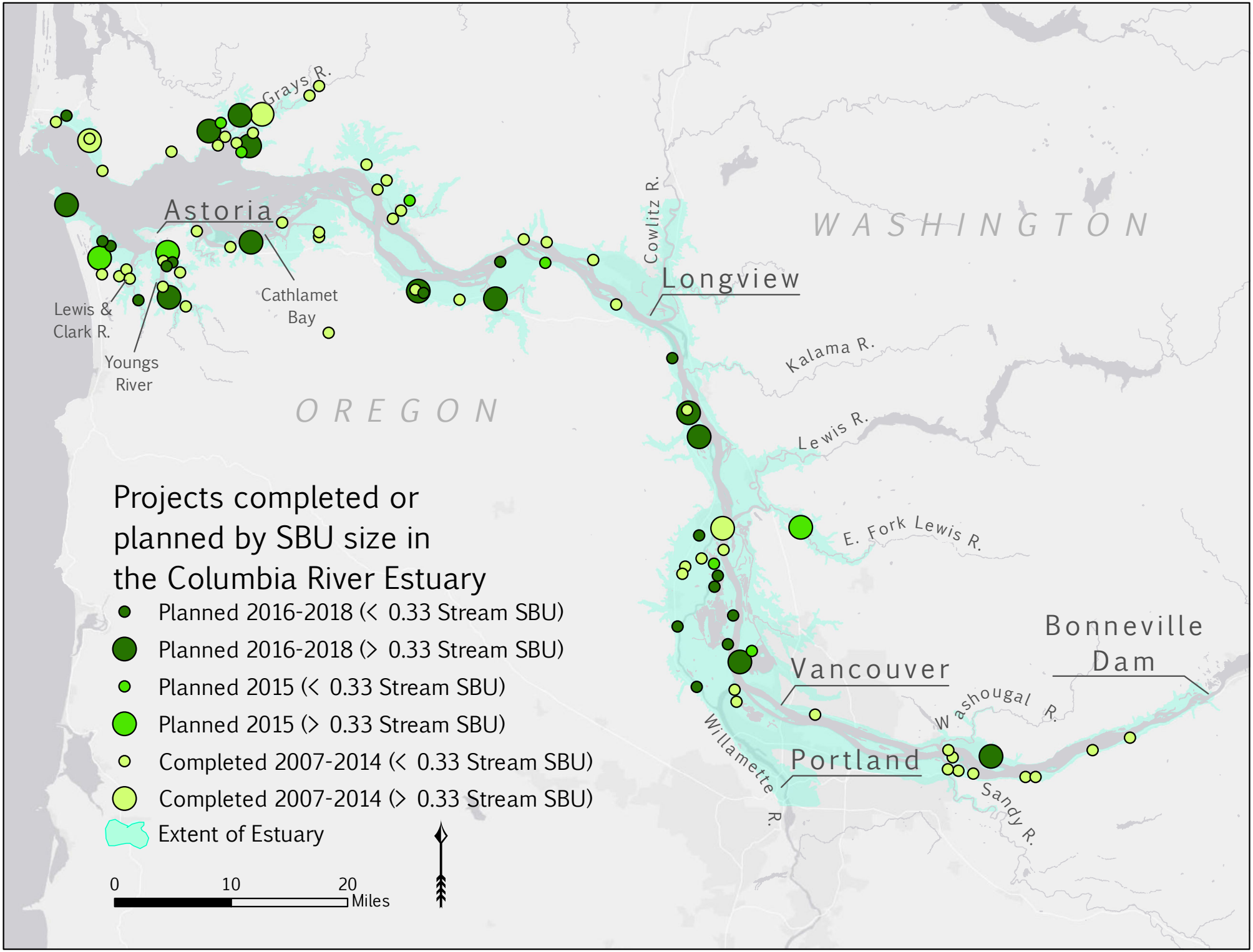
Science information improves over time



The building blocks of the RM&E program include complementary layers of research and analysis that will itself become more refined and focused over time to provide more detailed and accurate estimates of survival benefits. The improved estimates, in turn, will better inform the selection of habitat improvement projects.

EXHIBIT 6

Demonstrative map of estuary habitat restoration projects completed or planned, by survival benefit unit (SBU) size, in the Columbia River Estuary. Data for the estuary habitat projects, included SBU size, obtained from 2014 NOAA B47:4021-4033, 2014 NOAA B48:4339-4380, 4339-4380, and Reply Declaration of Dr. Krasnow, Exhibit 1 (ECF 2031).


Grays R.
Astoria
Cathlamet Bay
Lewis & Clark R.
Youngs River
OREGON
Cowlitz R.
Longview
WASHINGTON
Kalama R.
Lewis R.
E. Fork Lewis R.
Bonneville Dam
Vancouver
Washougal R.
Willamette R.
Portland
Sandy R.
Projects completed or planned by SBU size in the Columbia River Estuary
Planned 2016-2018 (< 0.33 Stream SBU)
Planned 2016-2018 (> 0.33 Stream SBU)
Planned 2015 (< 0.33 Stream SBU)
Planned 2015 (> 0.33 Stream SBU)
Completed 2007-2014 (< 0.33 Stream SBU)
Completed 2007-2014 (> 0.33 Stream SBU)
Extent of Estuary
0
10
20
Miles