

Cultural Resource Damages

Breathing Some Life Into CERCLA (if you know where to look)

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Over the last two decades, a series of cases spearheaded by the Confederated Tribes of the Colville Reservation have redefined major aspects of CERCLA caselaw. This litigatory saga has recently spat out a new holding in the Ninth Circuit's opinion on *Confederated Tribes of the Colville Reservation v. Teck Cominco Metals, Ltd.*¹ In this case, the appeals court held that CERCLA permits the recovery of natural resource damages (NRDs) with a "cultural use component," reversing the lower court's opinion that cultural resource damages (CRDs) are not authorized under CERCLA.² This blog aims to examine the ramifications of this holding; first by contextualizing it within the greater case; then by examining it as a fixture of CERCLA caselaw; and finally by speculating on how this decision may affect potential future litigation. This blog, in its limited scope, argues that Tribes now have an opportunity to rectify decades of uncompensated CRDs, expand the scope of CERCLA risk assessments, and hold polluters accountable for increased sums of damages. To fully capitalize on these recent shifts, Tribes should consider attaching dollar values to the "cultural components" of damaged natural resources when litigating, and should leverage this new claim type when negotiating with potential polluters on or around their lands.

HISTORY

Like many environmental cases involving NRDs on tribal lands, the *Teck Cominco* case has had a complicated and protracted history. The Ninth Circuit's 2025 ruling, therefore, cannot be effectively viewed in a vacuum, but ought to be placed into the context of the broader case before being analyzed.

Teck Cominco Metals is a Canadian diversified natural resources company which has engaged in mining and smelting for over a century.³ In 2004, the company was sued by the Confederated Tribes of the Colville Reservation for decades of alleged damages to the Upper Columbia River, which runs from British Columbia to the Pacific Ocean, forming much of the border between Washington and Oregon.⁴ The generative suit alleged that between 1930 and 1995, the company's smelter in Trail, B.C. directly discharged 400 tons of slag daily into the river,⁵ as well as roughly 132,000 tons of hazardous waste via effluent discharge between 1923 and 2005.⁶

¹ *Confederated Tribes of the Colville Reservation v. Teck Cominco Metals, Ltd.* No. 24-5565, 2025 WL 2525853 (9th Cir. Sept. 3, 2025) ("*Pakootas VI*").

² Ninth Circuit Expands Scope of Recoverable Natural-Resource Damages Under CERCLA, MGK Litigation Blog (Sept. 4, 2025), <https://www.mgkflitigationblog.com/Ninth-Circuit-Confederated-Tribes-Teck-CERCLA-NRD> (last visited Dec. 4, 2025).

³ Founded in 1913, and headquartered in Vancouver, British Columbia, Teck Resources Limited merged with longtime-associate Cominco, a mining and smelting operation, in 2001 to form Teck Cominco Metals, Ltd. See *Pakootas VI*, *supra* note 1 at 1-2.

⁴ *Pakootas v. Teck Cominco Metals Ltd.*, 473 F.3d 979 (9th Cir. 2007) ("*Pakootas I*").

⁵ Petitioners claim that total river contamination totaled nearly 10 million tons, including 7,300 tons of lead and 255,000 tons of zinc. *Id.* at 4.

⁶ Including 108,000 tons of zinc, 22,000 tons of lead, 200 tons of mercury, 1,700 tons of cadmium, and 270 tons of arsenic. *Id.* at 4-5.

The Colville Reservation is bordered on two sides by the Upper Columbia, and the river is a key fixture of culture and livelihood for the tribes living there.⁷ As the Tribes' "lifeblood" became a toxic dumping ground, many of their aquatic cultural practices diminished alongside income-generating activities, fomenting a century of disputes between the Tribes, Washington State, and Teck.⁸ In 2003, upon the Tribes' petition,⁹ EPA conducted an assessment of the Upper Columbia, found that it was eligible for listing on the National Priorities List,¹⁰ and ordered Teck to perform a RI/FS pursuant to CERCLA.¹¹ Teck did not comply, leading Joseph Pakootas and other enrolled members of the Colville Tribes to file a CERCLA §9659(a)(1) citizen suit seeking injunctive relief to enforce EPA's RI/FS order and impose penalties for non-compliance and cost-recovery.¹² The District Court trifurcated the suit to sequentially determine: (1) "whether Teck was liable as a potentially responsible party" (PRP);¹³ (2) "Teck's liability for response [and] cleanup... costs;"¹⁴ and (3) "Teck's liability for natural resource damages."¹⁵

PHASE 1

2006 - Teck moved to dismiss for lack of jurisdiction, arguing that CERCLA cannot apply extraterritorially. The Ninth Circuit held that so long as pollution "comes to rest" within the United States, PRPs can be held liable as arrangers under CERCLA §107(a)(3), and thus the Court has personal jurisdiction over Teck.¹⁶

PHASE 2

2018 - Washington State settles its claim for past response costs, while the Tribes proceed to trial. The District Court heightened the PRP burden to show divisibility of harm and awarded the Tribes \$8,597,976. The Ninth Circuit affirmed, finding Teck "jointly and severally liable to the Tribes and the State in any subsequent actions to recover past or future response costs under CERCLA §107(a)(4)(A)."¹⁷

PHASE 3

2024 - The Tribes and the State brought joint NRD claims based on "injury to benthic organisms in the river sediment and elevated mercury levels in fish," interim lost use of natural resources, and

⁷ *"Pakootas VI"*, *supra* note 1 at 7.

⁸ *Id.*

⁹ Pursuant to 42 U.S.C. § 9605 (2018).

¹⁰ *"Pakootas I"*, *supra* note 4 at 8-9.

¹¹ 40 C.F.R. § 300.430 (2025).

¹² *"Pakootas I"*, *supra* note 4 at 10.

¹³ *Pakootas v. Teck Cominco Metals, Ltd.*, 452 F.3d 1066 (9th Cir. 2006), Columbia Climate Law Website, <https://climate.law.columbia.edu/content/pakootas-v-teck-cominco-metals-ltd> (last visited Dec. 4, 2025).

¹⁴ *"Pakootas VI"*, *supra* note 1 at 7.

¹⁵ *Id.* at 8.

¹⁶ *"Pakootas I"*, *supra* note 4. In 2011, after EPA refused to collect penalties on the 892 days Teck had been in noncompliance with the initial RI/FS, the Ninth Circuit held that citizen penalty claims for noncompliance under the Unilateral Administrative Order are barred by CERCLA §113(h). *Pakootas v. Teck Cominco Metals, Ltd.*, 646 F.3d 1214 (9th Cir. 2011) (*"Pakootas II"*). Then, in 2016, the same court held that air emissions "merely settling" in U.S. waters do not constitute "arrangement for disposal" under CERCLA. *Pakootas v. Teck Cominco Metals, Ltd.*, 830 F.3d 975 (9th Cir. 2016) (*"Pakootas III"*).

¹⁷ *Pakootas v. Cominco Teck Metals, Ltd.* 905 F.3d 565, 574, 596 (9th Cir. 2018). (*"Pakootas IV"*)

restoration/replacement costs of those natural resources.¹⁸ The District Court denied Teck’s motion for dismissal, holding that NRD regulations in CERCLA are not strictly mandatory— natural resource claims can present a range of possible costs.¹⁹

Teck then moved for partial summary judgment on the Tribes’ separate NRD claims, arguing that CERCLA does not authorize NRDs for cultural service losses. The District Court granted the motion, and the Tribes appealed to the Ninth Circuit, emphasizing that “they sought natural resource damages [with a cultural component,] not cultural resource damages.”²⁰ Only one other court has spoken on this issue,²¹ and the Ninth Circuit reviewed de novo a grant of summary judgment.

CONFEDERATED TRIBES V. TECK COMINCO METALS, LTD. (9TH CIR. 2025)

At issue in this case is a complicated question: “can the Tribes claim ‘lost use of the injured natural resources for cultural purposes’ as natural resource damage when determining PRP liability costs under CERCLA §9607(a)(4)(C)?”²² The Tribes separately pursued claims for 3 ‘buckets’ of natural resources damages: (1) reduced tribal fishing trips due to state-issued advisories concerning unsafe mercury levels in fish; (2) the interim lost use of an uncontaminated river; and (3) the interim lost use of the injured natural resources for cultural purposes.²³ While the Tribes argued that the first two ‘buckets’ also contained cultural elements, it is the third claim which the District Court scrutinized in its ruling that CERCLA does not permit recovery for CRDs.

The Ninth Circuit’s opinion, penned by Judge Gould, defends the concept of CRDs on two bases: (1) the D.C. Circuit’s opinion in *State of Ohio v DOI* (D.C. Cir. 1989),²⁴ and (2) the plain language of CERCLA and subsequent regulations. The court held that nothing in CERCLA, nor the caselaw, “suggests that interim lost uses of injured natural resources which have a cultural component... should be excluded... from lost use damages authorized by CERCLA.”²⁵

STATE OF OHIO v DOI

Judge Gould cites *State of Ohio* religiously in his Ninth Circuit opinion, noting that even the District Court, in granting partial summary judgment on the Tribes’ cultural resources claim, acknowledged that “there is conflict... [with] *State of Ohio*.”²⁶ While the Court in *State of Ohio* did not address a case

¹⁸ “*Pakootas VI*”, *supra* note 1 at 8.

¹⁹ *Pakootas v. Teck Cominco Metals, Ltd.*, No. 2:04-CV-00256-SAB, 2024 WL 627260 (E.D. Wash. Feb. 14, 2024). (“*Pakootas V*”) (Holding also that CERCLA regulations do not require certain compliance by the parties when evaluating NRD assessments.)

²⁰ “*Pakootas VI*”, *supra* note 1 at 9.

²¹ *Coeur D’Alene Tribe v. Asarco Inc.*, Nos. CV 91-0342-N-EJL, CV 96-0122-N-EJL, 280 F. Supp. 2d 1094 (D. Idaho 2003), at 11 (holding that “cultural uses of water and soil by [the] Tribe are not recoverable as natural resource damages”).

²² “*Pakootas VI*”, *supra* note 1 at 6.

²³ Brief for Appellant, *Pakootas v. Teck Cominco Metals Ltd.*, No. 24-5565 (9th Cir. Nov. 21, 2024), available at <https://turtletalk.blog/wp-content/uploads/2025/04/cct-opening-brief.pdf>.

²⁴ *State of Ohio v. U.S. Dep’t of the Interior*, 880 F.2d 432 (D.C. Cir. 1989).

²⁵ “*Pakootas VI*”, *supra* note 1 at 1-3.

²⁶ *Pakootas v. Teck Cominco Metals, Ltd.*, No. 2:04-CV-00256-SAB (E.D. Wash. Feb. 6, 2024), available at https://www.narf.org/nill/bulletins/federal/documents/pakootas_v_teck.pdf. See, *State of Ohio*, *supra* note 24.

involving cultural resources, it crucially held that ‘nonuse’ services are “actionable under CERCLA,”²⁷ including interim loss of use for “existence value”²⁸ and “option value.”²⁹ Judge Wald, writing for the majority in *State of Ohio*, argued that any regulation “which focuses exclusively on the market values” for NRD claims is not a reasonable interpretation of CERCLA.³⁰ The Ninth Circuit applied this reasoning to the Tribes’ three ‘buckets’ of claims, concluding that an enhanced cultural value for damages from reduced river fishing, a contingent valuation study based on the nonuse “existence value” of an uncontaminated river, and unique cultural-use damages for injured natural resources, must all be permissible under the *State of Ohio* nonuse rubric.³¹

CERCLA’s STATUTORY LANGUAGE

Judge Gould goes on to assess the Tribes’ claims as they relate to recoverable damages permissible under CERCLA and its amendments.³² First, the Court recognizes that natural resources are defined as specific, tangible elements of nature.³³ It then quickly points out that Congress instructed that NRDs “shall not be limited by the sums which can be used to restore or replace natural resources,”³⁴ indicating that NRDs “normally include restoration costs at a minimum, plus interim lost-use value in appropriate cases.”³⁵ The court bolsters this with the fact that CERCLA does not define “use value,”³⁶ and a plain meaning interpretation suggests that cultural components “fall [inside] the scope of recoverable lost uses damages” under §9651(c)(2).³⁷

Furthermore, the court noted that the 1986 SARA amendments to CERCLA proscribed “double recovery” for NRDs,³⁸ indicating that a regulation implementing a “rigid hierarchy of permissible methods for determining ‘use values,’ [or] limiting recovery to the price commanded on the open market” must be

²⁷ “*Pakootas VI*,” *supra* note 1 at 9.

²⁸ The money one is willing to pay simply for the knowledge that the resource will continue to exist in a given state of being. *State of Ohio*, *supra* note 24 at 441.

²⁹ The money one would pay to reserve the option to use that resource in a certain state in the future. *Id.*

³⁰ *Id.* at 463. Judge Wald gives a simple example which illustrates the need for this rationale:

“Imagine a hazardous substance spill that kills a rookery of fur seals and destroys a habitat for seabirds at a sealife reserve. The lost use value of the seals and seabird habitat would be measured by the market value of the fur seals’ pelts (which would be approximately \$15 each) plus the selling price per acre of land comparable in value to that on which the spoiled bird habitat was located.” *Id.* at 442. Under a solely market-based valuation metric, even if a value turns out to be leagues less than the actual cost of restoring an affected area, there would be no other remedial measure available to the affected parties without non-use value calculations.

³¹ “*Pakootas VI*,” *supra* note 1 at 14.

³² To enforce the CERCLA provisions relating to monetary damage assessments (42 U.S.C. §9651(c) (1990)), Congress in 1990 mandated the development of two sets of procedures: Type A (small, limited-duration spills), and Type B (spill-specific). Department of Interior’s proposed regulations for Type B assessments were what was at stake in *State of Ohio*, where the Court held that CERCLA damages are required to cover the “cost of restoring all lost or impaired resource services.” Ellen Louderbough, *Role of Science in Valuing Natural Resources after State of Ohio*, 32 NAT. RES. J. 137 (1992). <https://digitalrepository.unm.edu/nrj/vol32/iss1/7> at 135-138.

³³ “Land, fish, wildlife, biota, air, water, ground water, drinking water supplies, and other such resources” 42 U.S.C. §9601(16); 43 C.F.R. §11.14(z).

³⁴ §9607(f)(1); bolstered by *State of Ohio*, which reasoned that “the measure of damages must not only be sufficient to cover the intended restoration or replacement uses in the usual case but may in some cases exceed restoration cost by incorporating interim lost use value as well.” *State of Ohio*, *supra* note 24 at 448.

³⁵ *Alaska Sport Fishing Ass’n v. Exxon Corp.*, 34 F.3d 769, 772 (9th Cir. 1994).

³⁶ §9651(c)(2).

³⁷ “*Pakootas VI*,” *supra* note 1 at 16.

³⁸ 42 U.S.C. §§ 9607(a), 9607(f)(1), 9607(f)(2)(C) (2018).

inherently contradictory to the statute.³⁹ Finally, a core pillar of CERCLA’s “restorative” purpose is to “assure that [responsible] parties [bear] the cost of remedying the conditions they created.”⁴⁰ Congress clearly aimed at providing full recovery for any damages to those harmed by the loss of natural resources, including damages “occasioned by lost human activities.”⁴¹ This is bolstered by subsequent federal regulations, which included “non-consumptive values” reflecting “utility derived by humans from a resource [which] ought to be included in a damage assessment.”⁴² In summation, cultural components, if reasonably calculable, *can* be counted amongst natural resource damages.

RAMIFICATIONS

It will likely be years before the ramifications of this Ninth Circuit ruling are fully understood. In the present case, Teck maintains that plaintiffs’ restoration cost estimates of \$315 million to \$413 million are uncertain, and it will be up to the District Court to formulate a test by which to weigh the “cultural” component of NRD claims.⁴³ Early analyses by legal scholars agree that if the Tribes can prove a “reliably calculated” value reflecting the “utility derived by humans from a resource,”⁴⁴ cultural components may be considered in the determination of damages stemming from lost use;⁴⁵ however, what that value is, and whether it will exceed traditional resource restoration costs is yet to be seen.

Clearly, the Ninth Circuit’s decision has expanded the scope of damages which can be recovered as NRDs—especially those associated with lost use—and some commentators argue that damages may be recoverable “even if the specific lost use is only ‘indirectly’ related to the injured natural resource.”⁴⁶ This

³⁹ *State of Ohio*, *supra* note 24 at 463.

⁴⁰ *Pinal Creek Grp. v. Newmont Mining Corp.*, 118 F.3d 1298, 1300 (9th Cir. 1997).

⁴¹ “*Pakootas VI*”, *supra* note 1 at 17.

⁴² *State of Ohio*, *supra* note 24 at 464.

⁴³ Pakootas–Teck Natural Resource Damage Assessments — CERCLA, MGK Litigation Blog (Mar. 5, 2019), <https://www.mgkflitigationblog.com/Pakootas-Teck-natural-resource-damage-assessments-CERCLA> (last visited Dec. 4, 2025).

⁴⁴ *State of Ohio*, *supra* note 24 at 464.

⁴⁵ Federal Appellate Court Addresses Scope, Mitchell Williams Law (Apr. 10, 2025), <https://www.mitchellwilliamsllaw.com/natural-resource-damages/cercla-federal-appellate-court-addresses-scope> (last visited Dec. 4, 2025).

⁴⁶ 9th Circuit Expands Scope of Recoverable Natural-Resource Damages Under CERCLA, Lowenstein (Sept. 5, 2025), <https://www.lowenstein.com/news-insights/publications/client-alerts/9th-circuit-expands-scope-of-recoverable-natural-resource-damages-under-cercla-environmental> (last visited Dec. 4, 2025).

may broaden the scope of the ruling, opening a wider doorway for contingent valuation claims,⁴⁷ or it may simply be a clear win for Native communities, to many of whom natural resources “are and have always been cultural resources.”⁴⁸ If either proves to be the case, the decision will have massive ramifications for tribes alleging CRDs, as they will now have access to strong precedent in the Ninth Circuit to increase the scope of valuation of alleged damages— whether that be in negotiation or at trial.

Presently, there are a number of tribal cases underway regarding the destruction of sacred sites and/or cultural resources which employ a spectrum of causes of action and damage assessment rubrics. There exists a chance, therefore, for parties suing for CRDs to utilize the rationale of this recent decision to expand the scope of their claims. For instance, in *Quechan Indian Tribe v. United States* (S.D. Cal. 2024), the Quechan Tribe was awarded \$8.2 million in damages after a federal government construction project destroyed cultural and archaeological sites on the tribe's reservation in California. The Tribe brought successful claims under the Federal Tort Claims Act (FTCA) for negligent destruction, and the District Court expanded the judgement to signal a strengthening of NHPA §106, mandating stricter tribal consultation.⁴⁹ While not a CERCLA case, *Quechan Tribe* is currently on appeal to the Ninth Circuit, and plaintiffs ought to consider utilizing the recent *Teck Cominco* precedent to bolster their cultural damages claims.⁵⁰

⁴⁷ “Neither the regulations, any of the cases, nor the court’s reasoning in *Confederated Tribes* is limited to tribal cultural resources. That the claimed cultural value is ancient helps to prove that it is genuine and significant, but it is not necessary to the existence of the value. This is a slippery area with policy implications. Should the concept of value be adjusted somehow in the NRD statutes and regulations?”

Our environment is full of invasive species that we like... Injury from a release that adversely affected those favored invasive species might be valued differently from injury from an adverse effect to a disfavored invasive species. That is a cultural difference.

Contingent valuation is a controversial technique that ascribes a value to a loss by surveying those affected by that loss about their willingness to pay to avoid the loss without requiring any observation of actual behavior; economists conventionally look to behavior, not statements, as a way of understanding preferences.” David G. Mandelbaum, *The Cultural Value of Natural Resources*, *The Legal Intelligencer* (Oct. 2, 2025), https://www.gtlaw.com/en/-/media/files/insights/published-articles/2025/10/mandelbaum_the-cultural-value-of-natural-resources.pdf.

⁴⁸ Amicus Curiae Brief — CERCLA & Pakootas, NARF (Nat’l Am. Rts. Fund), <https://narf.org/amicus-cercla-pakootas/> (last visited Dec. 4, 2025).

⁴⁹ *Quechan Indian Tribe v. United States* (S.D. Cal. 2024).

⁵⁰ The District Court highlighted that a “lack of traditional measures of market value does not limit Plaintiff’s recovery for impacts to its cultural resources” when determining the best-suited damage calculation metric— ultimately settling on a modified Resource Equivalency Analysis which paid for a Tribal museum and 50 years of staffing costs. *Id.* at 7, ¶ 5, citing *Heninger v. Dunn*, 101 Cal.App.3d 858, 862 (1980).

Similarly, in *Hualapai Tribe v. Bureau of Land Management* (D. Ariz. 2024), the Hualapai brought dual NEPA and NHPA claims against BLM for failure to consult and failure to take a “hard look” at environmental impacts of lithium mining near a sacred spring in Arizona.

In another relevant case, the Sauk-Suiattle Tribe in Washington filed an action in September 2024 seeking to expand the boundaries of their “used and accustomed” fishing areas to include freshwater rivers and marine waters beyond the areas previously recognized. A key claim by the Tribe is that the City of Seattle operates hydroelectric dams which allegedly block salmon and steelhead passage— both of which, the Tribe argues, are culturally-significant natural resources. While this is still a developing case, and does not involve CERCLA claims, there may now be some precedent to assess damage claims under an expanded culturally-inclusive rubric. *See* Lowenstein, *supra* note 45.

Even under its most limited reading, *Teck Cominco* expands CERCLA NRD cases. While there is clearly a wider avenue by which tribes can prove the cultural significance of damaged natural resources, this case may be useful for a plethora of groups.⁵¹ Non-use is a term of art in NRD claims which still lacks a completely agreed-upon definition,⁵² yet courts agree that natural resource trustees may recover damages for the public's lost use and non-use values, provided those damages can be reliably calculated.⁵³ The *Teck Cominco* ruling prints in black letter law that cultural resources *can* be included as part of a non-use NRD claim— regardless of whether the affected party is tribal or non-tribal. This codification expands the list of viable recovery options under CERCLA in the Ninth Circuit, where a huge percentage of tribal NRD claims originate.⁵⁴

CONCLUSION

With this decision, all actors filing CERCLA citizen suits should rightly ask “is there a considerable cultural component to this resource?” and, if so, “would conducting a contingent valuation study result in a potentially-higher damage claim than simply assessing traditional lost-use value?” While a seasonal Alaskan kayaking company might lose \$40,000 in revenue from an arsenic spill, citizen suit members might collectively claim far more in NRDs for lost “non-consumptive” use value of a pristine river.⁵⁵ Similarly, while a tribe can already claim lost use damages for temporary commercial fishing furloughs, it might receive a higher payout when factoring in the cultural component of fish upon its members’ culture.

Tribes should add this cultural component of natural resource damages to their litigatory toolbox and hold polluters accountable for an increased sum of damages— be that via settlement, negotiation, or trial. Furthermore, polluting entities should be increasingly wary of the scope of damages which a tribe might claim should it come to trial. Teck, for their part, have already paid out well over \$200 million dollars in fines pre-remand, and will likely be held accountable for hundreds of millions more.⁵⁶

See also Sauk-Suiattle Tribe Files Suit to Reclaim Ancestral Fishing Rights in Puget Sound Area, mctlaw (Sept. 17, 2024), <https://www.mctlaw.com/indian-law/sauk-suiattle-tribe-represented-by-attorneys-at-mctlaw-file-suit-to-reclaim-ancestral-fishing-rights-in-puget-sound-area/> (last visited Dec. 4, 2025); *See also* Ian Smith, *Protecting Salmon and Upholding the Rights of Nature Against Greenwashing in the Pacific Northwest*, Civil Rights & Social Justice Section, American Bar Association (Oct. 2024), <https://www.americanbar.org/groups/crsj/resources/human-rights/2024-october/protecting-salmon-upholding-rights-nature> (last visited Dec. 4, 2025).

⁵¹ Cultural Value of Natural Resources, *supra* note 46 at 2.

⁵² Environmental Law and Policy: Nature, Law, and Society (Zygmunt J.B. Plater et al. 1992).

⁵³ Natural Resource Damages: Frequently Asked Questions, U.S. Environmental Protection Agency (last updated Sept. 17, 2025), <https://www.epa.gov/superfund/natural-resource-damages-frequently-asked-questions#12> (last visited Dec. 4, 2025).

⁵⁴ *See, e.g. Federal Resources Corporation v. Coeur d'Alenes Company*, No. 12-36065, 2014 WL 4658340 (9th Cir. Sept. 16, 2014); *See also* Israel, Brian D., *Natural Resource Damages*, in *Environmental and Natural Resources Law* Ch. 32B (Arnold & Porter LLP 2006).

⁵⁵ *State of Ohio*, *supra* note 24 at 462-468.

⁵⁶ Pact to Restore Columbia Basin Salmon Populations Signed in White House Ceremony, The Center Square (May 23, 2024), https://www.thecentersquare.com/washington/article_4223a51f-3fe3-4adb-9d41-ec5dac20a83a.html (last visited Dec. 4, 2025).