Confederated Tribes and Bands
of the Yakama Nation

Established by the
Treaty of June 9, 1855

September 16, 2025

The Honorable Bruce Westerman
Chairman
House Committee on Natural Resources
1324 Longworth House Office Building
Washington, D.C., 20515

The Honorable Jared Huffman
Ranking Member
House Committee on Natural Resources
1332 Longworth House Office Building
Washington, D.C., 20515

The Honorable Harriet Hageman
Chair
House Committee on Natural Resources
Water, Wildlife, & Fisheries Subcommittee
1324 Longworth House Office Building
Washington, D.C., 20515

The Honorable Val Hoyle
Ranking Member
House Committee on Natural Resources
Water, Wildlife, & Fisheries Subcommittee
1332 Longworth House Office Building
Washington, D.C., 20515

RE: Opposition to H.R. 2073, the Defending Our Dams Act

Dear Chairs Westerman and Hageman, Ranking Members Huffman and Doyle and Committee Members,

Thank you for the opportunity to submit testimony for inclusion in the Subcommittee's hearing record regarding H.R. 2073, the Defending Our Dams Act. I write on behalf of the Confederated Tribes and Bands of the Yakama Nation ("Yakama Nation") to express our strong opposition to this bill, and to respectfully recommend that it not receive further action.

In a time of dynamic change for the Pacific Northwest's energy system and hydrological cycles, and of increasing knowledge about salmon science, this bill asks Congress to disregard best available science and innovative solutions, and to instead lock in outdated infrastructure and hydro operations approaches. Rather than empowering federal, state, and tribal entities to work collaboratively with regional stakeholders to solve the complex natural resource, energy, and infrastructure issues facing the Columbia Basin, this bill aims to tie the region's hands. Ultimately, this bill would undermine critical efforts to protect and restore Columbia Basin salmon and steelhead populations that are central to our region's culture, economy, and tribal communities. The Yakama Nation respectfully urges members of this Subcommittee to support comprehensive, science-driven strategies that can rebuild salmon abundance while honoring tribal sovereignty.

BACKGROUND

Yakama Nation is a sovereign Native Nation comprised of the confederated peoples of fourteen historic tribes and bands from the Columbia River Basin. Our inherent sovereign rights and privileges – including our reserved right to catch 50% of the harvestable adult salmon returning to the Columbia River each year – are recognized and guaranteed by the Treaty we signed with the United States in 1855.[1] The U.S. Constitution requires that our Treaty rights be upheld and respected as the supreme law of the land here in these United States of America.[2]

The Yakama Nation exercises direct jurisdiction over about 1.4 million acres in Central Washington, including the Yakama Reservation and multiple off-reservation trust allotments. Pursuant to its status as a sovereign Native Nation and its Treaty-reserved authority, the Yakama Nation works to protect all of the natural and cultural resources in Yakama Nation's historic Treaty-territory, and to provide for the health, safety, and welfare of the more than 11,000 enrolled Yakama members. We also regulate our members' exercise of their Treaty-reserved rights off-reservation in our ceded lands, which comprise about one-third of the State of Washington, and at traditional use areas throughout the Northwest.

Since time immemorial, the strength of the Yakama Nation and its People have come from Nch'í Wána – the Columbia River – and its tributaries, and from the fish, game, roots and berries nourished by their waters. Today, the majority of tribal fishermen on the Columbia River are Yakama ; and Yakama Nation Fisheries operates one of the largest and most sophisticated fisheries management and restoration programs in the Nation.

We are Salmon People; but we are also farmers, ranchers, loggers, and entrepreneurs. For example, the Yakama Nation government owns and operates tribal enterprises, including: Yakama Forest Products, which harvests and mills millions of board feet of lumber each year; Yakama Nation Farms, which cultivates nearly 2000 acres and produces organic and conventionally grown fresh produce crops for wholesale and community food distribution purposes; and Yakama Power, which delivers electricity to more than 3000 customers located on the Yakama Reservation, and is the only tribal electric utility with membership in the regional Public Power Council.

Yakama Nation works closely with the federal agencies responsible for operating the fourteen federal hydropower dams that comprise the Columbia River System ("CRS"). The annual operating plans and in-season management forums rely strongly on cooperative input from the states, tribes, and federal agencies to set priorities and balance multiple interests. Unfortunately,

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[1] U.S. Treaty with the Yakamas of June 9, 1855 (12 Stat. 951) (ratified Mar. 8, 1859), Art. III. Treaty fishing rights were also reserved by the Umatilla, Warm Springs, and Nez Perce tribes (together with the Yakama Nation, the "Columbia River Treaty Tribes"). *See,* Treaty of June 25, 1855, with the Tribes of Middle Oregon (12 Stat. 963); Treaty of June 9, 1855, with the Umatilla Tribe (12 Stat. 945); Treaty of June 11, 1855, with the Nez Perce Tribe (12 Stat. 957).

[2] U.S. Const. art. VI, cl. 2. Treaties between Indian tribes and the United States are within the ambit of the supremacy clause of the Constitution. *Worcester v. Georgia*, 31 U.S. 515, 559 (1832) ("The constitution, by declaring treaties already made, as well as those to be made, to be the supreme law of the land, has adopted and sanctioned the previous treaties with the Indian nations and consequently, admits their rank among those powers who are capable of making treaties."); *Menominee Tribe v. United States,* 391 U.S. 404, 412 (1968) ("The Treaty of Wolf River was, under Article VI of the Constitution, the 'supreme law of the land.'").

H.R. 2073 would significantly undermine the collaborative efforts to balance the many demands on the CRS, and ultimately impede the protection and restoration of Pacific Northwest salmon.

OBJECTIONS TO H.R. 2073

1. Prohibition on Studying Lower Snake River Dam Removal

Section 2(a) of H.R. 2073 would bar the use of federal funds to authorize, plan for, or even *study* the potential removal of the four Lower Snake River Dams (Ice Harbor, Lower Monumental, Little Goose, and Lower Granite). This provision runs contrary to the recommendations of the Columbia Basin Restoration Initiative ("CBRI")[3] – which reflects the consensus of the majority of tribal and state fisheries managers in the region — and the federal government's own report on Rebuilding Columbia Basin Salmon & Steelhead (NOAA 2022).[4] Both documents highlight that breaching the four lower Snake River dams ("LSRD's") is a centerpiece action necessary for ensuring the rebuilding of healthy and harvestable Snake River salmon and steelhead runs. The CBRI also highlights the urgent need to evaluate how we can replace the energy, transportation, water, and other services currently being provided by the LSRD's, so that we can take the actions we need to for fish.

Avoiding hard conversations about lower Snake River dam breach does not avoid the very real and present danger of Snake River salmon extinction; and sovereigns and stakeholders in the Pacific Northwest have made it clear that extinction is not an option they are willing to accept. By foreclosing science-based studies and shutting down federal conversation about replacement services and long-term solutions, H.R. 2073 would set the stage for continued litigation over Endangered Species Act compliance (which has been ongoing now for 30+ years) and other legal challenges instead of fostering collaborative approaches to achieving abundance. This legislation would prevent proposed studies that identify options for how we could provide LSRD replacement services *prior to* Congressional authorization of dam removal.

2. Vague, Overbroad Prohibition of "Functional Alterations" to the Dams

H.R. 2073's prohibition on funding any "functional alteration" of the dams is unclear and overly broad. This provision could be read in a manner that could impede necessary operations and maintenance actions at the lower Snake River dams, thereby weakening current hydrosystem functionality, and undermining both fish operations and energy reliability. For instance, the installation of a screen intended to divert downstream migrating salmon away from hydroelectric turbines could arguably qualify as a functional alteration of the dam.

3. Impractical Hydro Operations Provisions

H.R. 2073's hydro-operations provisions are vague, impractical, and could yield unintended consequences:

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[3] https://critfc.org/wp-content/uploads/2024/02/CBRI-overview.pdf
[4] https://repository.library.noaa.gov/view/noaa/46461

- *Disregard for other applicable law:* The bill does not identify how its directives would align with existing obligations and processes under the Northwest Power Act, the ESA, the Clean Water Act, and other federal laws.

- *Impractical approval framework:* Requiring both the Secretary of the Army and the Administrator of the Bonneville Power Administration to approve every operational change at the lower Snake River dams would undermine the day-to-day flexibilities necessary for appropriate adaptive management. Current adaptive management processes have been developed by the federal agencies in partnership with states and tribes. Spillage of water over the dams, and the timing of it, is essential for downstream salmon migration. Does it make any sense to replace existing collaborative forums that include regional fishery managers and dam operators that have access to daily fish counts and related data (i.e. water supply and temperature) as key decision makers and alternatively have that decision making placed into the hands of the BPA Administrator (who has many conflicting interests) and the Secretary of the Army who is 3,000 miles removed from our region and likely dealing with other critical issues? Complex dam operations for fish, energy, and other purposes should not be made on a political basis.

- *Risk of obstructing innovation:* The bill's rigid approach could prevent implementation of non-breach fish operation measures that have recently been advanced by Idaho, Washington, Oregon, and several Columbia Basin tribes through the Northwest Power & Conservation Council's Fish & Wildlife Program update process.

4. Apparent Reliance on Misleading Salmon Statistics

Yakama Nation is deeply concerned that H.R. 2073's policy approach is built upon a false perception that Columbia Basin salmon are doing well. We were especially concerned by misleading testimony provided by Northwest River Partners during the September 3, 2025 hearing. We submit the following testimony as Columbia Basin fish managers to set the record straight; and we encourage the Subcommittee to reexamine misleading assertions that Columbia Basin salmon are recovered rather than – for many populations – at high risk of extinction.

a. Historic abundance

Claims that salmon returns have "tripled" in the past century ignore the fact that historic runs totaled 10–16 million annually when Yakama Nation signed its Treaty with the United States in 1855, and reserved fishing rights to half of those runs. Today, the Columbia River is lucky to see 1-2 million fish crossing Bonneville Dam. Yakama Nation is not receiving the benefit of their Treaty bargain. Northwest River Partners disingenuously begins its historic revisionism by using 1938 as a starting date, five years after construction of Bonneville, Rock Island, and Grand Coulee dams began. In 1938, Columbia River salmon had been tremendously overfished by non-Indian commercial fishermen. In 1883 there were 39 canneries on the Columbia River and fishing was without limitation. Irrigation, mining, logging, water and tributary dams (Little Falls Dam was built in 1910) all contributed to the huge decline of salmon runs but eventually the

realization hit that those practices could not continue and by and large most were significantly curtailed, and regulations were implemented in an effort to build the runs back up. For NW River Partners to suggest that the dams built shortly thereafter have had no impact on efforts to restore the once great salmon and steelhead runs defies logic. As discussed below, the Northwest Power and Conservation Council (established by the Northwest Power Act and funded by the Bonneville Power Administration) has found that the hydropower system throughout the Basin causes losses of 5–11 million salmon and steelhead annually. Certainly, those losses cannot be attributed only to the Lower Snake River dams; but suggestions that those dams have played no role in the demise of Snake River runs is contrary to science and defies common sense.

b. Failure to meet regional restoration goals

Not only are salmon runs well below historic levels, they are also well below healthy and harvestable abundance levels. In 1987, the Northwest Power and Conservation Council ("NPCC") set an interim goal of five million fish returning to the Basin each year. Current Basin-wide returns are less than half that goal. In 2020, The multi-sovereign and stakeholder Columbia Basin Partnership Phase 2 Report,[5] published by the Marine Fisheries Advisory Committee for NOAA Fisheries , established nonpartisan, science-based low-, mid-, and high-level abundance levels for each Columbia Basin salmon and steelhead stock. Wild (natural)-origin abundance in 19 of 27 stocks does not even meet low-level goals. Only the upper Columbia River fall Chinook stock has reached its high-level goal. Our Columbia Basin fisheries – and Snake River fisheries in particular – are nowhere near where our region needs and wants them to be.

The NPCC has assessed that the hydropower system causes losses of 5–11 million salmon and steelhead annually, and has thus anchored its aggregate interim mitigation goals to the 5-million fish number.[6] Addressing these significant hydrosystem impacts is critical to salmon restoration; but Yakama Nation objects to Northwest River Partner's allegations in their testimony that "nearly all the focus is placed on the dams."

Tribal, state, and federal fish managers, as well as salmon advocates, continue to work across all the "four H's" of salmon conservation — habitat, hatcheries, harvest, and hydrosystem (and also, in the face of climate change, are working to address a fifth "H", heat). For example, the Columbia Basin Restoration Initiative underscores that rebuilding salmon runs requires a multi-pronged approach: modernizing and maintaining hatcheries, scaling up habitat restoration (particularly in the mid-Columbia mainstem and tributaries), and addressing hydrosystem impacts, while continuing appropriate harvest management through established forums. Increasing water temperatures due to climate change are exacerbating the impact of the dams and making recovery increasingly difficult.

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[5] NOAA Fisheries Marine Fisheries Advisory Committee; Columbia Basin Task Force Phase II Report; A Vision for Salmon and Steelhead: https://www.fisheries.noaa.gov/vision-salmon-and-steelhead-goals-restore-thriving-salmon-and-steelhead-columbia-river-basin

[6] *See e.g.,* NPCC, *A Retrospective of the Council's Fish & Wildlife Program 1980-2022,* at 5 (available at https://www.nwcouncil.org/fs/18802/retrospective.pdf) (2024).

c. *Wild stocks in crisis*

Today, the vast majority of salmon and steelhead returning to the Columbia Basin are hatchery fish, whereas historically, and at the times the dams were built, most fish were wild. We would refer you to the Columbia Basin Partnership Phase I Report, Figure 3.[7] We would also highly recommend a close review of the Columbia Basin Partnership Phase II Report. There is significant information in that report, which notes that "[a]n overarching message from the Partnership members is a strong sense of urgency that immediate action is needed to address salmon and steelhead declines."

Most wild salmon and steelhead runs persist at only a fraction of their historic abundance and geographic distribution, and some (including three of five in the Snake River) persist at less than one percent of their historic abundance with less than half of the historical populations remaining in the Columbia watersheds. For example, of the 35 extant Snake River Spring/summer Chinook populations, eight (24%) had fewer than 50 spawners (quasi-extinction) return in 2024. For wild Snake River steelhead, three out of 21 (14%) of populations had fewer than 50 spawners.

Using only select low and high data points from aggregated total dam counts – which include both wild and hatchery fish – to talk about the health and status of Columbia Basin salmon and steelhead is misleading because it obscures the critical fact that many ESA-listed and interior Columbia stocks remain in crisis. Aggregate dam counts can provide useful information, but they are of very limited value when it comes to assessing the status of the individual runs. Salmon are managed, and progress toward recovery is assessed, on a stock-by-stock basis by looking at spawner counts.

Stock-by-stock spawner counts show us that most individual stocks of naturally reproducing salmon and steelhead in the interior Columbia Basin are struggling. The multi-sovereign and stakeholder Columbia Basin Partnership Phase 2 report, published by the Marine Fisheries Advisory Committee to NOAA Fisheries, lays out the following with respect to the status of interior Columbia Basin salmon and steelhead stocks currently listed under the federal Endangered Species Act[8]:

Stock	Historic abundance	Columbia Basin Partnership mid-level abundance goal	Current natural origin fish abundance and percentage of historic numbers
Upper Columbia steelhead	1,121,400	31,000	**1,480 – 0.1%**
Upper Columbia spring Chinook	259,450	19,840	**1,430 – 0.6%**
Mid-Columbia steelhead	132,800	43,850	**18,155 – 13.7%**

[7] https://media.fisheries.noaa.gov/dam-migration/mafac_report_cbp_phase_1_recommendations_full_report.pdf
[8] https://www.fisheries.noaa.gov/vision-salmon-and-steelhead-goals-restore-thriving-salmon-and-steelhead-columbia-river-basin, Table 8.

Snake River fall Chinook	500,000	10,780	**8,360 – 1.7%**
Snake River sockeye	84,000	15,750	**100 – 0.1%**
Snake River steelhead	600,000	75,000	**28,000 – 4.7%**
Snake River spring/summer chinook	1,000,000	98,750	**6,988 – 0.7%**
Interior Columbia ESA-listed aggregate	***3,697,000***	***294,970***	***64,513 – 1.7%***

It would be unreasonable to examine these numbers and conclude that we are anywhere close to "mission accomplished" when it comes to recovering Columbia Basin salmon and steelhead. What these numbers illustrate is a crisis, with four of seven interior ESA-listed stocks below 1% of their historical population, and only one above 10% of that measure.

NOAA Fisheries recently conducted their 5-Year Status Review of each of these stocks and none of them have improved enough to modify their listing status. In fact, spring Chinook and steelhead in the upper Columbia and spring/summer Chinook and steelhead in the Snake basin are getting worse.[9]

Certain non-ESA-listed stocks, such as Okanagan sockeye and Hanford Reach fall Chinook are doing well, due to significant hatchery support and helpful tributary (sockeye) and mainstem (Hanford flow agreement) dam operations. Hanford Reach fall Chinook are the primary source for lower river tribal and non-tribal harvest. The tribes' current harvest levels are at less than 10% of their historic catch – and tribal harvest of spring Chinook, sockeye, and fall Chinook remain restricted due to the poor status of Snake River populations.

Additionally, Snake River fall Chinook remain listed under the ESA, but are doing better than other Snake River stocks, thanks in part to hatchery support. These fall Chinook remain listed as threatened because they lack the spawning habitat necessary to sufficiently reduce their extinction risk.

CONCLUSION

H.R. 2073 is not a balanced or science-based policy. By foreclosing scientific study, introducing impractical and vague operational restrictions, and disregarding the federal government's treaty and trust obligations, the bill would set back—not advance—the cause of salmon recovery, long-term energy reliability and affordability, and regional collaboration. The

[9] Report Card on Recovery: Reviews Assess 28 Salmon and Steelhead Species Returning to West Coast Rivers: https://www.fisheries.noaa.gov/west-coast/endangered-species-conservation/report-card-recovery-reviews-assess-28-salmon-and

Yakama Nation respectfully urges the members of this Subcommittee to reject H.R. 2073 and instead support comprehensive, science-driven strategies that can rebuild salmon abundance while honoring tribal sovereignty.

Thank you for your attention to these concerns and for including this testimony in the official hearing record regarding H.R. 2073.

Respectfully,

Gerald Lewis

Gerald Lewis, Chairman
Yakama Nation Tribal Council

Enclosure(s): (1) CBRI "Fish Facts" Sheet

NEZ PERCE • OREGON • UMATILLA • WARM SPRINGS • WASHINGTON • YAKAMA

Fish Facts

Columbia Basin Salmon, Steelhead, and Other Native Fish in Crisis

The Columbia River Basin once sustained 10-16 million salmon and steelhead, and a wide variety of other native fish species. Today over one-third of the historic salmon and steelhead populations are extinct and many of those remaining are considered quasi-extinct, with 50 or fewer wild fish returning to spawn each year. Of the 16 Columbia Basin salmon and steelhead stocks that originate above Bonneville Dam, 11 are either listed under the Endangered Species Act or have been extirpated. Other native fish (e.g., sturgeon and lamprey) have declined to alarmingly low levels. These declines have devastating consequences for Tribal Nations, recreational and commercial fishers, and all who call the Northwest home.

Of the 16 Columbia River salmon and steelhead stocks originating above Bonneville Dam, 4 are already gone and more than half of those remaining are listed under the Endangered Species Act.

Claims that Columbia Basin salmon are thriving and that abundance has increased since the construction of federal hydroelectric dams in the Columbia Basin are deeply misleading. In fact, to fully understand the status of each population of salmon and steelhead, multiple metrics must be used, of which abundance is only one (others are spatial structure, diversity, and population growth rate). A closer examination of abundance, along with the other metrics, shows that Columbia Basin salmon are in serious trouble.

HISTORIC LOWS ARE THE WRONG REFERENCE POINT

Measuring salmon abundance relative to a historical low point paints a false picture of growth. Relative to objective benchmarks, salmon abundance is abysmally low, even compared to levels required to keep species off the Endangered Species list. Objective reference points for current abundance include:

1 Historic declines

Salmon and steelhead abundance is down sharply from an estimated historic **10 to 16 million fish** returning each year[1]. Selectively looking at more recent returns obscures this broader picture of drastic declines (see graph below and map on next page).

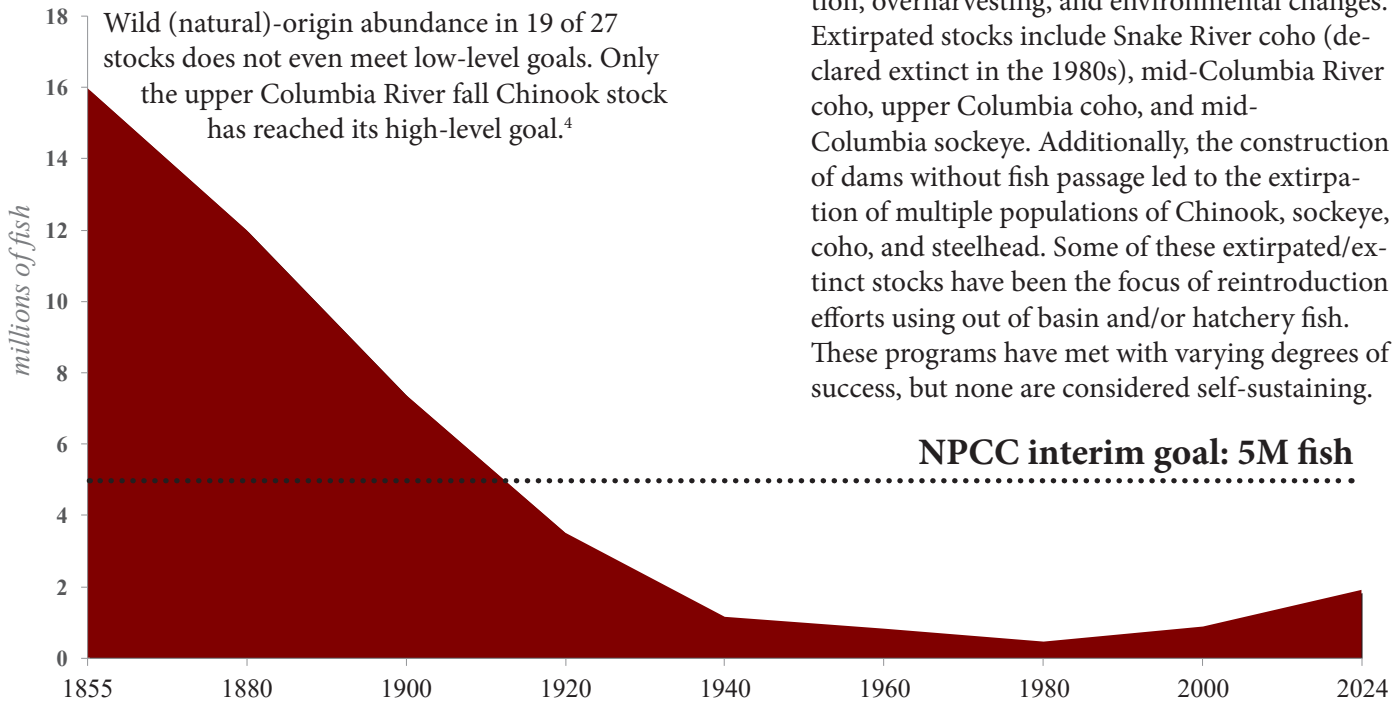
2 Healthy abundance

Salmon are well below healthy abundance levels. In 1987, the Northwest Power and Conservation Council (NPCC) set an interim goal of five million fish returning to the Basin[2]. Current Basin-wide returns are less than half that goal.[3] In 2020, the Columbia Basin Partnership Phase 2 Report established nonpartisan, science-based low-, mid-, and high-level abundance levels for each Columbia Basin salmon and steelhead stock. Wild (natural)-origin abundance in 19 of 27 stocks does not even meet low-level goals. Only the upper Columbia River fall Chinook stock has reached its high-level goal.[4]

3 ESA listing

Of the 16 salmon and steelhead stocks that historically returned to the Columbia River above Bonneville Dam , 7 persist at abundance so low they are listed for federal protection under the Endangered Species Act and four have been extirpated. Two of those stocks, upper Columbia River spring Chinook and Snake River sockeye are listed as "endangered" – the most severely imperiled ESA status. As of the most recent NOAA Fisheries status reviews, none of the ESA listed-listed salmon or steelhead populations in the Columbia Basin have been delisted or down-listed. NOAA concluded that all current listings remain warranted, with no changes in status recommended.[5]

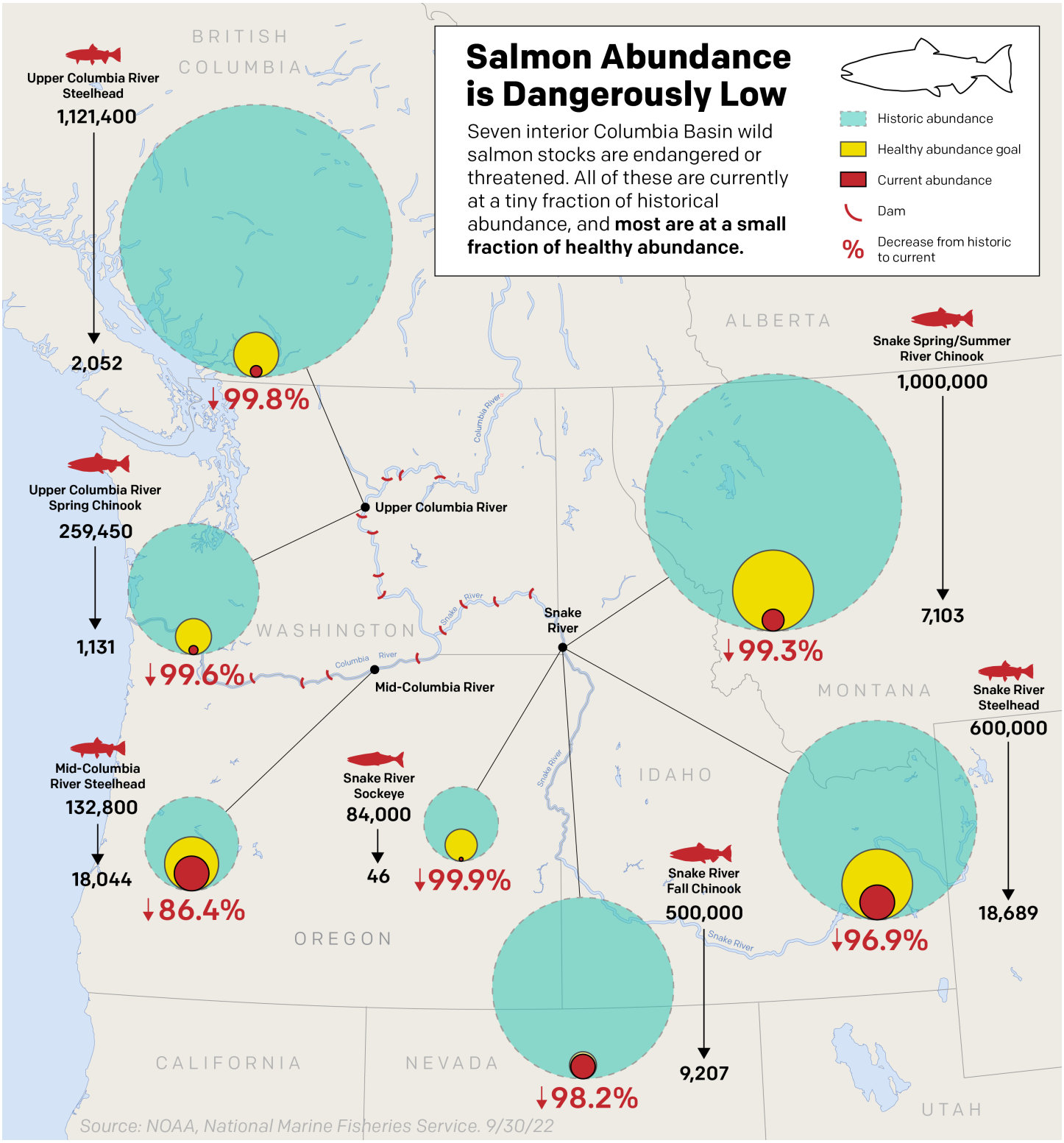
In addition to the ESA listings, four salmon and steelhead stocks have been extirpated due to factors such as dam construction, habitat degradation, overharvesting, and environmental changes. Extirpated stocks include Snake River coho (declared extinct in the 1980s), mid-Columbia River coho, upper Columbia coho, and mid-Columbia sockeye. Additionally, the construction of dams without fish passage led to the extirpation of multiple populations of Chinook, sockeye, coho, and steelhead. Some of these extirpated/extinct stocks have been the focus of reintroduction efforts using out of basin and/or hatchery fish. These programs have met with varying degrees of success, but none are considered self-sustaining.



Returning Columbia River salmon in 20-year snapshots, 1855-2024. 1855 data from NPCC historical run estimates; 1880-1920 data points extrapolated from Columbia River cannery output; 1940-present: dam counts & river mouth estimates

MOST POPULATIONS ARE DANGEROUSLY LOW

The chart below shows the annual populations of seven salmon and steelhead stocks in the Columbia Basin. The teal circles show the historic abundance of the stock; the yellow circles show the goal; and the red circles show the current population level. For example, Snake River spring/summer Chinook salmon have declined from 1 million fish to 7,103 fish—a 99.3% decline. Snake River sockeye have gone from 84,000 fish to only 46 fish—a drop of 99.9%.[6]



Different species, different geographic areas

Combining returns of all salmonids basin-wide is a coarse and incomplete way to evaluate salmon abundance. Species are not interchangeable—decreases in the number of Chinook (the largest "king" salmon), for example, cannot be offset by increases in smaller sockeye.

Similarly, increases in one geographic area can obscure continuing declines in others when all runs across the Basin are combined. For instance, due to improved tributary dam operations, habitat restoration, and hatchery programs (all occurring in Canada), Okanogan sockeye have seen significant increases in recent years. Meanwhile, Snake River sockeye remain dependent on a life support hatchery. In fact, despite the significant increases in Okanogan sockeye, sockeye harvest opportunities remain extremely limited in lower Columbia due to their intermingling with the nearly extinct Snake River sockeye salmon and the need to restrict harvest to protect these imperiled fish.

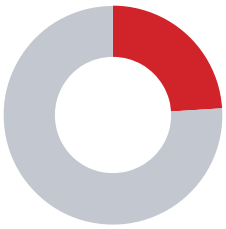
Fishers at Celilo Falls. 1951. CRITFC Matheny Collection

Tribal youth helping sort fish for spawning at Dworshak National Fish Hatchery. CRITFC.

WILD FISH AT RISK OF EXTINCTION

Most wild salmon and steelhead runs persist at a fraction of their historic abundance and geographic distribution, and some (including three of five in the Snake River) persist at less than one percent of their historic abundance[7] with less than half of the historical populations remaining in the Columbia watersheds. For example, of the 35 extant Snake River Spring/summer Chinook populations, eight (24%) had fewer than 50 spawners (quasi-extinction) return in 2024.[8] For wild Snake River steelhead, three out of 21 (14%) of populations had fewer than 50 spawners last year.

Combining returns of hatchery and wild fish obscures the low abundance and productivity decline in wild stocks. While hatchery production is important to allow for harvest opportunities that are culturally and economically important to the region, hatchery fish do not have the full genetic and geographic diversity of self-sustaining wild runs.



24% of Snake River spring/ summer Chinook are at the quasi-extinction threshold

14% of wild Snake River steelhead are at the quasi-extinction threshold

WILD FISH… AND HATCHERY FISH

Hatchery production

Hatchery production began in earnest to mitigate for dam construction in the 1940s. Prior to that, returns to the Columbia River were primarily wild fish. Today, "[h]atchery-origin fish … account for two-thirds of the average Columbia River return. Hatchery percentages are less than 10 percent for sockeye and chum salmon, but average 75 percent to over 90 percent for spring Chinook, summer Chinook, and coho salmon."[9]

Hatchery releases are concentrated in the lower portion of the basin; less than half of the Snake River populations have hatchery programs.

Unmet compensation goals

The promised level of hatchery-origin fish returning to make up for the impact of dams on wild fish (mitigation) is not being met (e.g. Lower Snake River Compensation Plan supported spring-summer Chinook salmon have never met their adult return goal established over 40 years ago). Even though hatchery production has increased, the majority of federal hatchery facilities in the Columbia Basin are not meeting and have never met their mitigation responsibilities in terms of adult returns and replacing lost fisheries opportunities.[10] Some hatcheries have had fish production reduced due to infrastructure constraints while other programs are still trying to develop hatchery production promised in mitigation commitments.

CONTRIBUTION TO MORTALITY

"Measuring" salmon abundance through selective and misleading numbers appears to be an attempt to support the false narrative that the federal hydrosystem does not harm salmon. But this narrative ignores the known and available information on the substantial role of the hydrosystem in salmon decline.

Pelican numbers are growing throughout the Columbia Basin due to the altered river environment created by the hydrosystem that is favorable to them. These fish-eating birds impact outmigating salmon smolts. ODFW.

Rebuilding report

Direct and indirect mortality associated with the hydrosystem is the largest freshwater limiting factor for upriver stocks. Hydrosystem-related alterations in the riverine environment (e.g., slower downstream migration times, warming water), avian bird colonies, and sea lion predation are the next largest freshwater limiting factors for most stocks (and still a major factor for the rest).[11]

Hydrosystem responsibility

The NPCC has estimated, through an exhaustive analysis with public review "declines in run size due to hydropower development and operation range from 5 to 11 million fish."[12] This compares with the total decline from all causes of about 7 million to 14 million adult fish."[13]

On the upper range of the NPCC estimate, the hydrosystem impact was responsible for 79% of the fish decline.

Failure to meet recovery targets

The Council set an interim goal at the low end of the range of losses caused by the hydropower system – **five million**. In 1987, the Council estimated the salmon population at 2.5 million returning fish. After 38 years, we are at about that same number,[14] even after significant reductions in salmon harvest and improvements in timber and mining practices.

[1] NPCC, Compilation of Information on Salmon and Steelhead Losses in the Columbia River Basin (March 1986), p.21. This was Appendix D of the 1987 PPCC Fish and Wildlife Program https://www.nwcouncil.org/reports/1987-columbia-river-basin-fishwildlife-program/.

[2] 1987 NPCC Fish and Wildlife Program, p.35, https://www.nwcouncil.org/sites/default/files/1987Program_0.PDF

[3] See Washington Department of Fish and Wildlife presentation: https://www.nwcouncil.org/fs/19333/2025_04_10.pdf.

[4] CPB Phase 2 Report page 47, Table 8, https://s3.amazonaws.com/media.fisheries.noaa.gov/2020-10/MAFAC_CRB_Phase2ReportFinal_508.pdf?null; Rebuilding Interior Columbia Basin Salmon and Steelhead, NOAA 2022 (Table 2).

[5] Interior Columbia and Snake River Salmon and Steelhead Maintain Listing Status, April 18, 2020, https://www.fisheries.noaa.gov/feature-story/interior-columbia-and-snake-river-salmon-and-steelhead-maintain-listing-status.

[6] Source: www.fisheries.noaa.gov/s3/2022-09/rebuilding-interior-columbia-basin-salmon-steelhead.pdf.

[7] Rebuilding Interior Columbia Basin Salmon and Steelhead, NOAA 2022 (Table 2).

[8] Nez Perce Tribe Department of Fisheries Resources Management, May 14, 2025, https://ryankinzer.github.io/SRAFS/.

[9] CPB Phase 2 Report at 42-43, https://s3.amazonaws.com/media.fisheries.noaa.gov/2020-10/MAFAC_CRB_Phase2ReportFinal_508.pdf?null. (Table 6)

[10] Tom Iverson, Yakama Nation Fisheries, personal communication.

[11] Rebuilding Interior Columbia Basin Salmon and Steelhead, NOAA 2022 (Table 3).

[12] 1987 NPCC Fish and Wildlife Program, p.38, https://www.nwcouncil.org/sites/default/files/1987Program_0.PDF

[13] 1987 NPCC Fish and Wildlife Program, p.38, https://www.nwcouncil.org/sites/default/files/1987Program_0.PDF

[14] https://www.nwcouncil.org/fs/19333/2025_04_10.pdf.