



Energizing Life in Our Communities

June 10, 2025

VIA ELECTRONIC FILING

Debbie-Anne A. Reese, Secretary
Federal Energy Regulatory Commission (FERC)
888 First Street NE
Washington, DC 20426

**Re: Jackson Hydroelectric Project, FERC No. 2157
Fish Habitat Enhancement Plan 2024 Annual Report
License Appendix G A-LA 12**

Dear Secretary Reese:

Enclosed is Public Utility District No. 1 of Snohomish County's *Fish Habitat Enhancement Plan (FHEP) 2024 Annual Report* pursuant to the Jackson Hydroelectric Project's License Appendix G A-LA12. The draft report was provided to the Aquatic Resource Committee for review and comment on April 29 for a 30-day review and comment period; no comments were received. Consultation documentation is included in the report's Appendix A.

If you have any questions on the FHEP 2024 Annual Report, please contact Dawn Presler, Lead – Licensing & Compliance, at (425) 783-1709 or DJPresler@snopud.com.

Sincerely,

/s/ *Andrew McDonnell*

Andrew McDonnell
Manager, Natural Resources
(425) 783-1841
AWMcDonnell@snopud.com

Enclosed: Fish Habitat Enhancement Plan 2024 Annual Report

cc: Aquatic Resource Committee

Henry M. Jackson Hydroelectric Project

(FERC No. 2157)



Fish Habitat Enhancement Plan: 2024 Annual Report (A-LA 12)



Everett, WA

June 2025

FINAL – This document has been prepared by Snohomish PUD based on information known at the time of its preparation and with that understanding is considered complete. The document may be cited as:

Public Utility District No. 1 of Snohomish County (Snohomish PUD). 2025. Fish Habitat Enhancement Plan: 2024 Annual Report (A-LA 12) for the Henry M. Jackson Hydroelectric Project, FERC No. 2157. June 2025.

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APPENDICES

Appendix A Consultation Documentation Regarding Draft Report

LIST OF ACRONYMS

A-LA 12	Aquatic License Article 12: Fish Habitat Enhancement Plan
ARC	Aquatic Resource Committee
FERC	Federal Energy Regulatory Commission
FHE	Fish Habitat Enhancement
HEA	Habitat Enhancement Account
Project	Henry M. Jackson Hydroelectric Project, FERC No. 2157
Snohomish PUD	Public Utility District No. 1 of Snohomish County

1.0 INTRODUCTION

Public Utility District No. 1 of Snohomish County (Snohomish PUD) received a license on September 2, 2011 (License), from the Federal Energy Regulatory Commission (FERC) for the Henry M. Jackson Hydroelectric Project (Project). License Ordering Paragraphs D (Washington Department of Ecology 401 Water Quality Certification conditions) and E (U.S. Forest Service section 4(e) conditions) require Snohomish PUD to implement Aquatic License Article 12: Fish Habitat Enhancement Plan (A-LA 12) as detailed in License Appendix G. Snohomish PUD filed the Fish Habitat Enhancement Plan (FHE Plan) with the FERC on November 19, 2010.

As indicated in the FHE Plan, funded projects will be designed to provide additional Project-related enhancements to aquatic resources and hydrologic processes focused in the Sultan River basin; thereby, providing considerable benefits to aquatic habitat and anadromous and resident fish populations throughout the License term. These additional habitat enhancement projects, working in conjunction with other protection, mitigation, and enhancement measures, such as improved side channel connectivity, increased instream flows, and implementation of fish passage at the Diversion Dam, will likely substantially increase the quantity and quality of aquatic habitat and performance of anadromous and resident fish populations in the lower Sultan River. Establishment of the ongoing FHE Plan and Habitat Enhancement Account (HEA) will also allow for adaptive management as conditions in the basin change. The mitigation provided through the fund will best be able to address long-term habitat enhancement and restoration needs by allowing flexibility to ensure that projects are developed and implemented during the License term.

Pursuant to Section 6.2 of the FHE Plan, Snohomish PUD is to prepare a report by June 30 of each year detailing activities that occurred the previous year and activities planned for the present year as they relate to implementation of FHE Plan-approved projects. This FHE Plan Annual Report covers activities conducted in 2024 and planned for 2025.

The draft report was provided to the Aquatic Resource Committee (ARC) on April 29, 2025, for a 30-day review and comment period; no comments were received. The ARC consists of the City of Everett, City of Sultan, Snohomish County, Washington Department of Ecology, Washington Department of Fish and Wildlife, Tulalip Tribes, U.S. Forest Service, National Marine Fisheries Service, U.S. Fish and Wildlife Service, and American Whitewater. Documentation of consultation with the ARC regarding the report is included in Appendix A.

2.0 ACTIVITIES FOR YEAR 2024

2.1 Project Selection

In 2024, the ARC agreed to fund the pursuit of an 8.3-acre property acquisition near the new side channel project along the lower Sultan River. This would include acquisition along with access rights to the land-locked parcel, real estate fees, some restoration plantings, and funds for future use in case of vandalism, invasive weeds, etc.

2.2 Project Implementation

2.2.1 Land Restoration on Acquired Carlson Property

Snohomish PUD removed features from the acquired property, including removing horse fencing, a shed, septic, a patio, and a mobile home. Site visits and discussion with neighbors occurred. Some blackberries were removed along property lines.

2.2.2 Land Acquisition – 8.3-acre Property

The ARC agreed to acquire an 8.3-acre parcel connected to new side channel on the lower river. Initial investigation was begun by Snohomish PUD Real Estate staff.

2.2.3 Ecology Grant for Side Channel Development in Land Conservation Easements

Side channel excavation and replanting was substantially completed in 2024; this occurred on the land conservation easements from Volunteers of America and private landowner Knowlton.

2.3 Project Monitoring

No monitoring of FHE Plan habitat projects was conducted beyond that already described above.

3.0 ACTIVITIES FOR YEAR 2025

3.1 Project Selection

Typically, new projects can be proposed as part of the ARC meeting in October 2025. Projects needing immediate attention can be brought before the ARC at any time.

3.2 Project Implementation

3.2.1 Land Restoration Plan on Acquired Carlson Property

Staff will continue to manage for a selection of invasive species on the property. A plan will be developed identifying potential additional restoration measures and presented to the ARC for discussion and approval of future activities.

3.2.2 Land Acquisition – 8.3-acre Property

Snohomish PUD Real Estate staff will continue to pursue the potential purchase with the landowner. If successful, Snohomish PUD staff will develop a plan for potential restoration efforts. Once developed, the plan will be presented to the ARC for approval.

3.2.3 Ecology Grant for Side Channel Development in Land Conservation Easements

Staff will finalize mulching and plantings in the conservation easements and monitor for plant survival and invasive weeds. The contractor will replace plants if a survival threshold is not met.

3.3 Project Monitoring

Staff will conduct an annual inspection of the ~30-acre “Hochfeld” property, and conservation easements along Volunteers of America and Knowlton properties associated with the side channel project, to assess for trespass or vandalism.

4.0 FUND BALANCE

The HEA was seeded with \$2.5 million upon License issuance. Starting the tenth anniversary after issuance of the License (Year 11) and annually thereafter for the term of the License, Snohomish PUD deposits \$200,000 (based on 2011 dollars) into the fund account per Section 5.1 of the FHE Plan.

As of December 31, 2024, the fund’s account balance was \$ 2,824,775.66. However, this balance does not reflect amounts not yet spent towards approved projects, debited from the fund, and reserves for potential slides. The balance of unallocated funds for use on future projects is approximately \$1.8 million, as follows:

Fund Start 2011	+\$ 2,500,000.00
September 2021 Annual Payment	+\$ 256,365.42
September 2022 Annual Payment	+\$ 279,539.79
September 2023 Annual Payment	+\$ 294,640.08
September 2024 Annual Payment	+\$ 303,818.47
Interest to-date (as of 12/31/24)	+\$ 473,225.53
Subtotal	+\$ 4,107,589.29 (deposits)
Confluence property acquisition	-\$ 4,861.38 (closed)
Lower Skykomish River restoration	-\$ 157,955.98 (closed)
Riparian restoration Sultan River	-\$ 219,491.25 (closed)
Riparian restoration Sultan River (2-yr extension)	-\$ 0 (closed)
Habitat Projects prioritization	-\$ 48,493.80 (closed)
LWD in Reaches 2 & 3	-\$ 100,000.00 (closed)
Conservation easement - Oster	-\$ 0 (closed)
Sonar Device (ARIS)	-\$ 149,684.81 (closed)
RCO Grant Match - 2022	-\$ 0 (closed)
8.3-acre Lower Sultan property acquisition	-\$ 195,000.00 (allocated)
Conservation easement – Knowlton	-\$ 45,000.00 (allocated)
Conservation easement – VOA	-\$ 27,000.00 (allocated)
Carlson property acquisition	-\$ 672,000.00 (allocated)
Hochfeld property acquisition	-\$ 173,300.00 (allocated)
Future slides reserve	-\$ 500,000.00 (allocated)
Subtotal	-\$ 2,292,787.22(spent or allocated)
Total	\$ 1,814,802.07 (unallocated balance)

5.0 FHE PLAN RECOMMENDATIONS

No recommendations for changes to the FHE Plan are being made at this time.

Appendix A

Consultation Documentation Regarding Draft Report

From: [Presler, Dawn](#)
To: [Anne Savery](#); [Anna Thelen](#); [Anne Baxter](#); [Applegate, Brock A \(DFW\)](#); [Elizabeth Babcock](#); [Jeff Garnett](#); [Mike Rustay](#); [Nate Morgan](#); [Pete Verhey](#); [Richard Vacirca](#); [Scott Bohling](#); [Tom O'Keefe](#)
Cc: [McDonnell, Andrew](#); [Nobles, Matthew](#); [Legare, Kyle](#)
Subject: Jackson Hydro (FERC No. 2157) - draft FHE Annual Rpt for your 30-day review and comment period
Date: Tuesday, April 29, 2025 4:25:00 PM
Attachments: [image001.png](#)
[2024 FHEP DRAFT Annual Report.pdf](#)

Dear ARC Members,

Attached is the Fish Habitat Enhancement (FHE) Plan DRAFT 2024 Annual Report for the Jackson Hydro Project for your 30-day review and comment period. Please provide comments, if any, back to me by May 29 end of day. As you will see from the report, there is ~\$1.8M for the ARC to spend towards future projects at this time; an additional ~\$300K (depends on CPI) will be deposited in September for the annual payment.

Let me know if you have any questions regarding this report or the FHE Plan. Thank you.

Cheers,

Dawn Presler, MSIM MSSM (she/her)

Lead – Environmental & Licensing Compliance
Natural Resources, Generation | Snohomish PUD

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Note: Emails and attachments sent to and from the PUD are public records and may be subject to disclosure.