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State Water Resource Control Board

June 30, 2026

Ms. Debbie-Anne Reese, Secretary  
Federal Energy Regulatory Commission  
888 First Street, NE  
Washington, D.C. 20426  
**Via e-filing**

**Monticello Power Plant Project  
Federal Energy Regulatory Commission Project No. 2780  
Napa, Solano, and Yolo Counties  
Putah Creek**

**MONTICELLO POWER PLANT RELICENSING PRE-APPLICATION DOCUMENT  
COMMENT LETTER**

Dear Secretary Reese:

On December 12, 2025, the Solano Irrigation District (SID) filed a Notice of Intent to prepare a license application and a Pre-Application Document (PAD) for the Monticello Power Plant Project. SID owns and operates the Monticello Power Plant Project, Federal Energy Regulatory Commission (FERC) Project No. 2780 (Project) located on Putah Creek. The Project is located at the base of Monticello Dam Lake Berryessa which is part of the by the United States Department of the Interior, Bureau of Reclamation's Solano Project and within Napa, Solano, and Yolo counties approximately 8.5 miles west of the City of Winters. The existing Project includes two penstocks, one powerhouse containing three turbine-generator units (two with a FERC authorized installed capacity of 5 megawatts (MW) and one with a 1.5 MW capacity), and one switchyard. The Project's switchyard provides power to the grid via Pacific Gas and Electric's (PG&E) existing Monticello Tap, FERC Project No. 5828.

On December 12, 2025, SID filed a request with FERC to use the Traditional Licensing Process (TLP) for relicensing of the Monticello Power Plant (Project). On February 25, 2026, FERC granted SID their request to use the TLP. On April 7, 2026, State Water Resources Control Board (State Water Board) staff attended a site visit and virtual public meeting hosted by SID to discuss the Project relicensing and information contained in the PAD. The public meeting began the comment period in which interested parties could submit comments on the Project's PAD and request additional studies. State Water Board staff hereby submits the enclosed *Attachment A: Comments on Pre-Application Document for Monticello Power Plant Relicensing*.

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E. JOAQUIN ESQUIVEL, CHAIR | ERIC OPPENHEIMER, EXECUTIVE DIRECTOR

If you have questions regarding this letter or the attachment please contact Wilhelmina Chon, Project Manager, by email at [Wilhelmina.Chon@waterboards.ca.gov](mailto:Wilhelmina.Chon@waterboards.ca.gov). Written correspondence should be directed to:

State Water Resources Control Board  
Division of Water Rights – Water Quality Certification Program  
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Sincerely,

*Wilhelmina Chon*

Wilhelmina Chon, Environmental Scientist  
Division of Water Rights

Attachment:

A – Comments on the Pre-Application Document for Monticello Power Plant Relicensing

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**ATTACHMENT A**  
**COMMENTS ON THE PRE-APPLICATION DOCUMENT FOR**  
**MONTICELLO POWER PLANT RELICENSING**

**Background and Regulatory Authority**

Section 401 of the Clean Water Act (CWA) requires any applicant for a federal license or permit for an activity that may result in any discharge to navigable waters to obtain certification from the State that the activity will comply with the applicable water quality requirements, including the requirements of section 303 of the Clean Water Act for water quality standards and implementation plans. CWA section 401 directs that certifications shall prescribe effluent limitations and other conditions necessary to ensure compliance with the CWA and with any other appropriate requirements of state law. Conditions of certification shall become a condition of any federal license or permit subject to certification. The Project will result in an activity that may result in discharge to navigable waters and must obtain certification from the State Water Resources Control Board (State Water Board) as part of relicensing for continued operations.

A certification issued by the State Water Board for the Project must ensure compliance with applicable water quality standards in the Central Valley Regional Water Board's Water Quality Control Plan for the Sacramento River Basin and the San Joaquin River Basin (Central Valley Basin Plan) (Central Valley Regional Water Board 2019). Water quality control plans designate the beneficial uses of water that are to be protected, water quality objectives for the reasonable protection of the beneficial uses and the prevention of nuisance, and a program of implementation to achieve the water quality objectives. (Cal. Wat. Code, §§ 13241, 13050, subds. (h), (j).) The beneficial uses, together with the water quality objectives contained in the water quality control plans, and applicable anti-degradation requirements, constitute California's water quality standards for purposes of the CWA. In issuing water quality certification for a project, the State Water Board must ensure consistency with the designated beneficial uses of waters affected by the project, the water quality objectives developed to protect those uses, and anti-degradation requirements. (*PUD No. 1 of Jefferson County v. Washington Dept. of Ecology* (1994) 511 U.S. 700, 714-719.)

Project facilities are located on Putah Creek immediately downstream of Monticello Dam. The Central Valley Basin Plan identifies Putah Creek from Lake Berryessa to the Yolo Bypass as having the following beneficial uses: municipal and domestic supply; hydropower generation; water contact recreation; non-contact water recreation; warm freshwater habitat; spawning – warm freshwater habitat; wildlife habitat; agricultural supply; and potential cold freshwater habitat.

Information collected through the implementation of study plans in the Federal Energy Regulatory Commission (FERC) relicensing process will be used by FERC to develop license conditions and fulfill its obligations under the National Environmental Policy Act (NEPA), and by other agencies that must take permitting actions during relicensing proceedings. Study plan information will assist the State Water Board in developing water quality certification conditions to ensure compliance with the CWA and appropriate requirements of state law.

As an agency with authority to impose mandatory conditions in FERC's relicensing process, the State Water Board will act in an advisory role to inform SID of information

necessary to fulfill the requirements of the water quality certification process. The State Water Board exercises independent authority in issuing water quality certifications; therefore, its role in any pre-decisional activities is advisory, rather than necessarily reflective of the State Water Board's ultimate determinations.

In this advisory role, State Water Board staff will participate in the relicensing process and submit study plan requests and comments in accordance with the TLP. If the study plans implemented do not cover the requests of State Water Board staff, or are otherwise insufficient to provide information needed in connection with the issuance of the water quality certification, or its determined that additional information is necessary to inform the certification process, the State Water Board may choose to request such information under the Porter-Cologne Water Quality Control Act, Water Code section 13383, or other applicable authority. To avoid unnecessary delays in the Project's relicensing process, State Water Board staff strongly encourage SID to work collaboratively with State Water Board staff and other relicensing participants to resolve differences. When possible, working collaboratively with all relicensing participants often allows for expedited resolution of issues.

### **General Comments**

Compliance with the California Environmental Quality Act (CEQA) is required as part of the water quality certification process. CEQA requires the lead agency to evaluate a project's potential impacts to environmental resources as well as identify mitigation measures and alternatives to reduce project impacts. CEQA also requires public input on identified impacts and mitigation measures. CEQA documentation must analyze and evaluate the Project's impact to all relevant resources, including aquatic biological resources, special status species, water quality standards, and water quality control plans. Information from studies and data gathering during FERC relicensing informs CEQA document development.

CEQA defines the lead agency as "the public agency which has the principal responsibility for carrying out or approving a project." (Cal. Code Regs., tit. 14, § 15367). SID is a public agency with the primary responsibility for developing and implementing the Project. It is State Water Board staff's understanding that SID will act as the CEQA lead agency for the Project. State Water Board staff request SID confirm that it is the CEQA lead agency for the Project.

Additionally, the State Water Board strongly encourages SID to proceed with the CEQA process early in relicensing; specifically, prior to submitting a water quality certification application. The CEQA process can occur independently of FERC's NEPA process and will inform the State Water Board of potential water quality impacts associated with the Project. Without adequate information on the Project's potential impacts to water quality, the State Water Board may be unable to issue a certification.