State Water Resources Control Board

July 7, 2026

Sam and Jennifer Thackeray
[redacted]

CONDITIONAL APPROVAL OF 2025-2030 GROUNDWATER LOCAL COOPERATIVE SOLUTION FOR SPENCER RANCH/THACKERAY LIVESTOCK

Dear Mr. and Mrs. Thackeray:

Assembly Bill (AB) 263, signed into law on September 26, 2025, extended the effective period of the State Water Resources Control Board's (State Water Board's) Scott River and Shasta River Emergency Regulation (Cal. Code Regs., tit. 23, §§ 875-875.9) (Regulation)[1] until January 1, 2031, or until permanent rules establishing and implementing long-term instream flow requirements are adopted for those watersheds, whichever occurs first. Under the Regulation, local cooperative solutions by individuals or groups may be proposed by petition to the Deputy Director of the Division of Water Rights (Deputy Director) as an alternative means of reducing water use to meet or preserve the emergency minimum flows, or to provide other fishery benefits, in lieu of curtailment.

Section 875, subdivision (f)(4)(D) of the Regulation describes three types of local cooperative solutions specifically for overlying or adjudicated groundwater diversions for irrigated agriculture: Best Management Practices, Graduated Cessation Schedule, and Percent Reduction. The Deputy Director may approve a proposal submitted by an individual or group, provided that it meets the specific requirements of the applicable groundwater local cooperative solution type, satisfies the metering and inspection requirements, is founded on a binding agreement with a coordinating entity if the petitioner chooses that option, and is to be implemented throughout the entirety of the irrigation season. The Deputy Director's approval of a proposal for a groundwater local cooperative solution may be subject to appropriate conditions, including metering, monitoring, and reporting requirements, to assure that no unreasonable injury to users of water will occur, that the terms and purpose of the petition or the associated underlying binding agreement will be met, and to provide information useful in responding to ongoing drought.

[1] *Establishment of Minimum Instream Flow Requirements, Curtailment Authority, and Information Order Authority in the Scott River and Shasta River Watersheds.* Available online: https://www.waterboards.ca.gov/drought/scott_shasta_rivers/docs/2025/2025-scott-shasta-emergency-reg-adopted-searchable.pdf

Summary of Proposal
The State Water Board received a proposal[2] from Sam and Jennifer Thackeray (petitioner) for a Percent Reduction groundwater local cooperative solution for the 2025 through 2030 irrigation seasons that proposes to reduce water use by 30% compared to water use in the 2021 irrigation season. The proposal covers 225 acres of land irrigated by two groundwater wells. The petitioner proposes to achieve water use reduction with the following water conservation actions:

- 140 acres of pasture wheel line have been replaced with three Low Energy Precision Application (LEPA) center pivots for an estimated 40% water use reduction compared to the 2021 baseline year.
- Reduce set times for the "River Field" wheel line, which comprises 50 acres of pasture. The irrigation set times are reduced from 10 hours to 9 hours (10% water use reduction from April to June) and from 10 hours to 8.5 hours (15% water use reduction from July to October) compared to the 2021 baseline.
- Reduce set times for the "Meadow" K lines that irrigate 25 acres of pasture. The irrigation set times are reduced from 10 hours to 8.5 hours (estimated 15% water use reduction) compared to the 2021 baseline year.
- Reduce set times for the "Hayfield" wheel line that irrigates 10 acres of alfalfa. The irrigation set times are reduced from 10 hours to 9 hours (estimated 10% water use reduction) compared to the 2021 baseline year.
- Cease irrigation from the "Hayfield" wheel line in September and October on 10 acres of alfalfa compared to the 2021 baseline year.
- Replaced the main 50-horsepower (hp) pump with a new high efficiency pump with a variable frequency drive (VFD) on 175 acres of property in 2022. The VFD allows for specific irrigation management for each field, rather than a standard water application across all acres covered by the pump.
- In 2022, soil moisture sensors were installed across all fields irrigated by the new VFD pump. These sensors help determine when and how much water should be applied. Together with the VFD pump, this setup enables more efficient irrigation for each field and reduces wasted water applications.

Applied Water Baseline
Per the Regulation, the relevant water use reduction shall generally be based on a comparison to the 2020, 2021, 2022, or 2023 irrigation season, and may be demonstrated by evidence that provides a reasonable assurance that the change in farming practice or other action results in at least the relevant proportionate reduction in water use. However, if evidence for the amount of water applied during the 2020, 2021, 2022, or 2023 irrigation seasons indicates that the base rate of applied water is higher than 33 inches per year for alfalfa, 14 inches per year for grain, or 30 inches per year for pasture, then the base rate of applied water shall be set to these specified values, unless the petitioner makes an additional showing that a higher base rate number is an appropriate comparison in light of relevant information that can include but is not limited

[2] The term "proposal" includes, as applicable, elements of the petitioners' Application Form for 2025 Local Cooperative Solution, communications with Division of Water Rights staff, and content from the petitioners' approved 2024 local cooperative solution. Generally, any applicable content is restated in this letter as part of the current proposal.

to multi-year practices, soil type, and irrigation methods. (Cal. Code Regs., tit. 23, § 875, subd. (f)(4)(D)(v).)

The petitioner has proposed to use a higher base rate of applied water for a subset of their fields for pasture and alfalfa for the 2025 through the 2030 irrigation seasons, rather than the values specified in the Regulation. The petitioner is specifically proposing to use 63 inches per year for 50 acres of pasture for the “River Field” wheel lines, 125 inches per year for 25 acres of pasture for the “Meadow” K line and “Corner” K lines, and 59 inches per year for 10 acres of alfalfa for the “Hayfield” wheel line. Use of those higher values for the limited subset of acres, averaged with using the base rate values specified in the Regulation for the remaining acres, results in a proposal to use 52 inches per year for pasture and 59 inches per year for alfalfa.

The petitioner’s justification supporting the request for the higher base rate is that, although petitioner has implemented notable improvements to the irrigation system that have reduced overall water use, portions of the property continue to be irrigated using a 25-hp pump that is approximately 40-50 years old to irrigate 50 acres of the property. Additionally, 85 acres of the property are irrigated with wheel lines, hand lines, and end guns that are approximately 40-50 years old. The design of these systems has made it so water cannot be targeted to areas in visible need of irrigation without extreme damage to the infrastructure of the system due to over-pressurization.

The State Water Board finds the proposed higher base values are relatively high when considering the water demands of the crops, soil moisture levels, and seasonal precipitation contributions. However, the State Water Board approves the requested baseline values as the proposal provides sufficient evidence that changes made to a majority of the irrigation methods have resulted in the reduced application of water including the conversion of 140 acres of wheel lines to center pivots, reduction in set times for existing wheel lines, ceasing irrigation on 10 acres of alfalfa in September and October, replacement of the main 50-hp irrigation pump with a new high efficiency pump with VFD, and the installation of soil moisture sensors that are being used to inform applied water. Two meters are installed (as described below) that will provide the data necessary to understand applied water amounts relative to different watering practices and crop types that may be used in the future.

The proposal was posted to the State Water Board’s webpage for groundwater local cooperative solutions associated with the Regulation on May 2, 2025. A further description of the site and water reduction measures is provided in the application submitted for this proposal. The application identifies Scott River Water Trust as the coordinating entity and includes a “Binding Agreement” that grants property access to verify compliance with the proposal for the term of the proposal (2025-2030).

Groundwater Metering

A groundwater local cooperative solution must include a description of any existing groundwater metering, and a proposal to meter and record such extractions or applications on a weekly basis, and to report this information monthly to the Deputy Director (or the coordinating entity, if so agreed), with limited exceptions. If a meter may not be installed prior to the start of the irrigation season, the petitioner may submit a

time schedule as part of the proposal that describes and substantiates the efforts, actions, and timelines for meter installation. The Deputy Director may waive the metering requirement for groundwater wells irrigating less than 30 acres or upon a determination that metering in a particular instance is not feasible. The Deputy Director may also approve a time schedule for the installation of a meter if not currently installed at the start of the irrigation season.

The petitioner has installed meters on each of the two groundwater wells that irrigate the 225 acres covering the proposal, enabling monitoring of 100% of the total irrigated acreage covered by the proposal. The proposal includes a plan to record and maintain a log of the groundwater meter data for the two wells on a weekly basis and provide monthly reports to the coordinating entity.

Approval
The Deputy Director of the Division of Water Rights has delegated the authority to approve groundwater local cooperative solutions to the Assistant Deputy Director of the Water Quality Certification, Flow, Data, and Administrative Branch. The Assistant Deputy Director has reviewed the groundwater local cooperative solution proposal and finds that it meets the requirements of Regulation section 875, subdivision (f)(4)(D), with the following conditions:

- The petitioner shall meter, record, and maintain a log of the water pumping and usage data from the existing groundwater meters that cover the two groundwater wells throughout the 2025 through 2030 irrigation seasons on a weekly basis, consistent with the Regulation. The data for metered acreage shall be submitted to the State Water Board by the 10th of each month for the preceding month.

The petitioner's groundwater local cooperative solution proposal is hereby approved, as conditioned in this letter. Any failure to implement any commitments of the proposal and any conditions of this approval (collectively, the approved local cooperative solution) is subject to enforcement as a violation of the Regulation. Additionally, violations of other provisions of the Regulation (e.g., surface water curtailment) may result in termination of this approval.

If you have questions regarding this approval, please contact Division of Water Rights staff via an email to: ScottShastaFlows@waterboards.ca.gov or by leaving a message on our dedicated phone line at (916) 327-3113.

Sincerely,

Erin Ragazzi
Assistant Deputy Director
Water Quality Certification, Flow, Data, and Administrative Branch
Division of Water Rights

cc: Scott River Water Trust
chrisb.voigt@gmail.com