CALIFORNIA Water Boards

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ENVIRONMENTAL PROTECTION

State Water Resources Control Board

November 6, 2026

Mr. Judd Hanna
Hanna Bros. Ranch
[redacted]

CONDITIONAL APPROVAL OF 2026 GROUNDWATER LOCAL COOPERATIVE SOLUTION FOR HANNA BROS. RANCH

Dear Mr. Hanna:

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) 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[1], 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.

[1] *Establishment of Minimum Instream Flow Requirements, Curtailment Authority, and Information Order Authority in the Scott River and Shasta River Watersheds*, available online at: 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 Judd Hanna (petitioner) for a Percent Reduction groundwater local cooperative solution for the 2026 irrigation season that proposes to reduce water use by 40% compared to water use in the 2020 irrigation season. The proposal covers 1,153.5 acres of land irrigated by 13 groundwater wells. The petitioner proposes to achieve the water use reduction with the following water conservation actions:

- Reduce the amount of water applied by pivots compared to the amount used during the 2020 baseline year by installing nine pivots with a low energy precision application (LEPA) system instead of wheel lines;
- Reduce the amount of water applied by wheel lines by installing smaller nozzles;
- Change crop production from one field (129 acres) from orchard/pasture to pasture;
- Install and use an additional 13 soil moisture sensors to inform irrigation; and
- Reduce set times for the wheel lines to shorter durations than used in the 2020 baseline year.

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

The petitioner requested to use a higher 2020 base rate of applied water for alfalfa, grain, and pasture; proposing 47 inches per year for alfalfa, 23 inches per year for grain, and 39 inches per year for pasture in the Percent Reduction Proposal. The petitioner supported the request for the use of the higher base rates for all three crop types due to the property's porous and rocky soil conditions, which the petitioner expressed necessitated more watering and reduced the accuracy of readings on moisture meters. The State Water Board finds the petitioner makes an additional showing that the higher base rate numbers are an appropriate comparison in light of the relevant soil type information provided, considering uncertainty regarding water application needs in the Scott Valley, and because meters are installed on 90% of the acreage covered by this proposal, which will provide data to inform applied water amounts.

[2] The term "proposal" includes, as applicable, elements of the petitioners' Application Form for 2026 Local Cooperative Solution, communications with Division of Water Rights staff, and content from one or more of the petitioners' previous local cooperative solutions. Generally, any applicable content is restated in this letter as part of the current proposal.

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. The proposal was posted to the State Water Board's webpage for local cooperative solutions[3] associated with the Regulation on April 16, 2026. No comments were received on the proposal.

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. (Cal. Code Regs., tit. 23, § 875, subd. (f)(4)(D)(iii)(a)-(c).)

The petitioner has installed meters on 3 of 13 groundwater wells that irrigate 417 acres and 11 meters on 11 pivots that irrigate 625.5 acres, enabling monitoring of water usage on 90% of the total irrigated acreage covered by the proposal (1,042.5 of 1,153.5 acres). The proposal includes a plan to record and maintain a log of the meter data of the three groundwater wells and pivots on a weekly basis and provide monthly reports to the coordinating entity by the 10th of each month.

The proposal includes a request to waive the metering requirement for the [redacted] groundwater well (20 acres[4]) because it irrigates a field that is less than 30 acres. Additionally, the petitioner requests a waiver of the metering requirement for the corner acreage (91 acres) of the fields watered by pivots that are separately irrigated by groundwater wells that the petitioner found to be incompatible with metering. The petitioner states that metering the corner acreage is infeasible considering the cost associated with upgrading their system to become compatible with flow meters, and notes that meters would need to be buried underground. The proposal includes a plan to record all start dates of irrigation, the number of days it takes for each wheel line to complete irrigating, and the amount of water used per month to estimate water usage on the unmetered acreage.

Approval

The Deputy Director 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 of the Division of Water Rights. The Assistant Deputy Director has reviewed the groundwater local cooperative solution proposal and

[3] http://www.waterboards.ca.gov/waterrights/water_issues/programs/drought/scott_shasta_rivers/lcs2026.html

[4] The [redacted] groundwater well irrigates 20 acres per the proposal's spreadsheet (or 19 acres per email correspondence). For calculations in this letter, 20 acres is used.

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 11 pivots and three groundwater wells that irrigate 1,042.5 acres throughout the 2026 irrigation season in accordance with the Regulation.
- The petitioner shall follow the plan in the proposal to estimate applied water use for the remaining 111 unmetered acres, throughout the 2026 irrigation season in accordance with the Regulation.
- The data and information for the metered (1,042.5 acres) and unmetered (111 acres) acreage shall be submitted to the State Water Board by the 10th of each month, reflecting records for the previous month.

The Division of Water Rights grants the petitioner's request to waive the metering requirement for 111 irrigated acres provided that the petitioner adheres to the conditions of approval above considering that meters have been installed on all pivots and three groundwater wells enabling monitor of water usage for 90% of the 1,153.5 total irrigated acres. Additionally, the unmetered acreage is described as a field (20 acres) less than 30 acres and corner acreage of fields predominantly irrigated by metered pivots and it is understood that there are feasibility issues with metering the remaining groundwater wells. The petitioner has taken reasonable steps to install five new meters in 2026 that will monitor 323.4 irrigated acres, demonstrating a commitment to improved monitoring, and is expected to continue in similar efforts as resources allow in the coming years. The petitioner is encouraged to continue to assess the ability to meter the remaining acreage not covered by meters as conditional approval of this proposal does not assure approval under the same conditions in the future (e.g., additional metering may be required).

The petitioner's groundwater local cooperative solution proposal is hereby approved, as noted 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
scottwatertrust@gmail.com