

# Jenner Cattle Co. Inc.



March 21, 2024

State Water Resources Control Board

1001 I Street Sacramento, CA 95814

Re: 2024 Cooperative Solution – Jenner Cattle Co. Inc.

To the State Water Board:

As authorized by 23 CCR §§ 875-875.9, Jenner Cattle Co. Inc. provides this letter to further describe its proposed local cooperative solution (LCS) for the 2024 irrigation season.

Jenner Cattle Co. Is a 6<sup>th</sup> generation cattle and hay ranch. The operation currently irrigates 1835 acres of farm ground and pasture by use of ground water pumping and diverted water. The majority of the pasture ground has been irrigated by adjudicated surface water when available. When surface water is not available, portions of the pasture ground can be irrigated by ground water pumping by means of flood irrigation conveyed by pipeline, or pivot irrigation. Jenner Cattle Co. has various methods of irrigation which include: Surface water diversions (adjudicated first priority), Flood irrigation conveyed by pipeline and risers, 6 wheel lines, and 3 pivots. Over The past 150 years, the family has always sought out efficiency when it comes to irrigation practices. We have been land leveling ground for the past 60 years and laser leveling the past 15 years. This has reduced the amount of flood watering time by more than 50%, therefore reducing amount of water by 50%. We hope that this savings is taken in account. The cost of laser leveling ground is very expensive and time consuming; however we have always sought out means of conserving water as well as being the most efficient as possible with water. The company has also installed 3 pivots, Water savings is something that we have been pursuing throughout the years as a common practice, even before it was asked by us to consider.

The water board needs to understand how much they are asking the producer to sacrifice on a year like this. **There is No Way that we are in an emergency drought!!!** By curtailing surface water, then also a 30% reduction in ground water, we are faced with very difficult circumstances to keep the business alive. A water taking of this magnitude needs to be

addressed with some sort of financial compensation. We feel that there needs to be more communication with the producers on long term solutions, rather than being forced into mandates and curtailments that will eventually bankrupt our business and our way of life. The producers and water right holders have not been appreciated or have been given credit for the years of water savings technologies and expense that they have already had to endure on their own. I hope that our voices, expertise, and solutions will be heard and part of future discussions moving forward.

Jenner Cattle Co. would like to work with Chris Voight and the water trust for monitoring and third party verification. Using both field maps, and our water savings plan, we can keep track of irrigation and be able to verify compliance of the LCS.

Sincerely,

Jenner Cattle Co. Inc.

Nick Jenner

[REDACTED]

[REDACTED]

Jenner Cattle Co. Inc.

Proposed waivers for ground water LCS plan for 2024

1. **New Baseline Numbers** - Since the Water Board set new base lines of 30-33 inches for pasture and alfalfa, this new baseline has put my crops in jeopardy. Irrigated pasture needs at least this much water, if not more to survive. But then to reduce it by 30% is not feasible in some circumstances. These numbers should be higher than alfalfa. We are trying to grow pasture from April-Nov. Pasture also has a much more shallow root structure than alfalfa, leaving it more susceptible to stress and even complete dying off of pasture, where alfalfa would go into dormancy from dryness. These baseline numbers should have been discussed with all producers before moving forward.
  - a. Pasture irrigation differs in all parts of Scott Valley, depending on soil type, temperature, and irrigation methods. Flood irrigation is our primary irrigation method on most of our pasture. Flood takes the same amount of water each irrigation to insure water getting from the top of the field to the bottom. You cannot speed up your set time, or put on fewer inches. By putting on less water, or speeding up your time, the water would only get half way down the field. This would result in complete non irrigation of that part of the field and result in death of pasture which we will not allow.
  - b. I am asking for an exemption on certain fields that still show a savings of 30% from 2020, but cannot meet these extreme new base line numbers.
2. **Metering requirements** – The addition of metering requirements has raised huge concerns, frustration, and worry among the farmers and ranchers. As I pointed out during the meeting with the water board, the complexity, cost, time and effort associated with installing a meter on an existing well manifold would be infeasible in most circumstances. We do have 2 meters that are in place on 2 wells; however we would not be able to give daily flow meter numbers. Once again the assumption of the water board on how a working farm and ranch operates is not comparable to reality of how

it operates. I would have to hire another employee simply to go around from well to well to record flow numbers every day. We are sometimes miles and miles away, working, doing other things. It isn't as convenient as the board makes it sound.

- a. We are asking for an exemption on other well meters because of cost, time, and possible damage to irrigation system to installing meters.
- b. We are asking for an exemption to daily reporting on the 2 meters that we do have because of infeasible time, effort and personal required for daily monitoring. We would propose weekly monitoring.

Thank you for taking in our considerations, frustrations and fears about this 2024 season. More and More regulation does not equal more water! We need to all work together to come up with solutions.

Sincerely,

Nick Jenner

Jenner Cattle Co. Inc.





# Scott River Water Trust

P.O. Box 591 ~ Etna, CA 96027  
530-643-2395 [scottwatertrust@gmail.com](mailto:scottwatertrust@gmail.com)

Month, Day, Year

## APPLICATION TO SCOTT RIVER WATER TRUST AS COORDINATING ENTITY for the SCOTT VALLEY GROUNDWATER REDUCTION LOCAL COOPERATIVE SOLUTION

The following request is being submitted pursuant to Section 875.5, , subdivision (a)(1)(A)(ix) [Scott River] of the Scott-Shasta Drought Emergency Regulation of the State Water Resources Control Board (SWB). The purpose of this Local Cooperative Solution (LCS) is to document the applicant's proposed reduction in use of overlying or adjudicated groundwater use by a certain amount over the entire irrigation season.

Applicant's Name: Jenner Cattle Co. Inc.



Owner of property (if different): 2004 Jenner family limited partnership

Leaseholder of property (if different): beaver valley cattle, Patty Damera

Other Contact Info:

Identify Specific Parcels served by overlying or adjudicated groundwater for irrigation, as identified in relevant curtailment order (SO# or SG#). Include irrigated acreage and number of wells.

Total irrigated acres to be included in this agreement:

▶ Attach curtailment plan and map of properties to be included in plan

I agree to pay SRWT for its time to help prepare my water reduction plan at the rate of \$75/hr. When your LCS plan is complete, a Binding Agreement will need to be signed with the SRWT as your designated Coordinating Entity. SRWT will need to verify that the plan's actions are being met.

▶ Nick Jenner

Nick Jenner (Apr 9, 2024 06:30 PDT)

4/9/2024

▶ Applicant signature

Date:

Christopher Voigt

Date: 4/8/2024

Scott River Water Trust signature






# SRWT\_LCS\_2024\_eSignature\_revised\_V2

Final Audit Report

2024-04-09

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