

## State Water Resources Control Board

August 19, 2025

Mr. Brett Piersall  
Piersall Ranch  
[REDACTED]

### CONDITIONAL APPROVAL OF 2025 GROUNDWATER LOCAL COOPERATIVE SOLUTION FOR PIERSALL RANCH

Dear Mr. Piersall:

The State Water Resources Control Board (State Water Board) readopted a regulation that went in effect on January 27, 2025, that establishes emergency minimum flows in the Scott River and Shasta River watersheds (Cal. Code Regs., tit. 23, §§ 875-875.9) (Regulation). Under the [Regulation](#)<sup>1</sup>, 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 solution proposals 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 made with a Coordinating Entity if the petitioner chooses that option, and is to be implemented throughout the entirety of the irrigation season.

#### Summary of Proposal

The State Water Board received a proposal<sup>2</sup> from Brett Piersall (petitioner) for a Percent Reduction groundwater local cooperative solution for the 2025 season that proposes to reduce water use by 32% compared to water use in the 2020 irrigation season. The proposal covers 168 acres of land irrigated by six groundwater wells. The petitioner

<sup>1</sup> [https://www.waterboards.ca.gov/drought/scott\\_shasta\\_rivers/docs/2025/2025-scott-shasta-emergency-reg-adopted-searchable.pdf](https://www.waterboards.ca.gov/drought/scott_shasta_rivers/docs/2025/2025-scott-shasta-emergency-reg-adopted-searchable.pdf)

<sup>2</sup> 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.

proposes to achieve the water use reduction with the following water conservation action:

- Upgraded 78-acre pivot system to a Low Energy Precision Application (LEPA) system following the 2024 irrigation season; and
- Reduced the amount of water applied by three pivots on 90 acres (i.e., by reducing the number of passes) compared to the amount used during the baseline year.

The proposal was posted to the State Water Board's webpage for local cooperative solutions associated with the Regulation on April 18, 2025. A further description of the site and water reduction measures is provided in the application submitted for this proposal. The application identifies the Scott River Water Trust as the Coordinating Entity and includes a "Binding Agreement" that grants property access to verify compliance with 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 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 a meter that measures the two groundwater wells that irrigate 90 acres and a meter on a pivot that irrigates 78 acres, enabling monitoring of water usage on 100% of the total irrigated acreage covered by the proposal. The proposal includes a plan to record the meter readings (weekly, if possible) and maintain a log of the metered water use data. The petitioner will provide monthly reports to the Coordinating Entity for the two meters covering the two ground water wells and one pivot.

### **Approval**

The Division of Water Rights 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 usage and pumping data from the groundwater meters that cover the one pivot and two groundwater wells throughout the 2025 irrigation season on a weekly basis, consistent with the Regulation. The metering data shall be submitted to the State

Water Board by the 10<sup>th</sup> of each month for the preceding month. The Division of Water Rights recognizes that implementation of the requirement for weekly recording of metered data may require operational adjustments, and will allow reasonable time to achieve full compliance, provided there is demonstrable progress towards meeting the weekly requirement.

The groundwater local cooperative solution proposal is hereby approved, as conditioned. 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](mailto:ScottShastaFlows@waterboards.ca.gov) or by leaving a message on our dedicated phone line at: (916) 327-3113.

Sincerely,



Erin Ragazzi  
Assistant Deputy Director  
Acting Deputy Director for Scott Shasta Flows Local Cooperative Solutions  
Division of Water Rights

cc: Scott River Water Trust  
[scottwatertrust@gmail.com](mailto:scottwatertrust@gmail.com)