

State Water Resources Control Board

August 11, 2025

David and Janet Grassman
Grassman Farming



CONDITIONAL APPROVAL OF 2025-2029 GROUNDWATER LOCAL COOPERATIVE SOLUTION FOR GRASSMAN FARMING

Dear David and Janet Grassman:

The State Water Resources Control Board (State Water Board) readopted an emergency 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](#)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 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 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 proposal² from David and Janet Grassman (petitioners) that involves reducing water use from two groundwater wells that irrigate a

¹ https://www.waterboards.ca.gov/drought/scott_shasta_rivers/docs/2025/2025-scott-shasta-emergency-reg-adopted-searchable.pdf

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.

total of 35.7 acres for the 2025-2029 irrigation seasons using Option 1 of the Graduated Cessation Schedule groundwater local cooperative solution. The Option 1 schedule involves ceasing irrigation of:

- 15% of irrigated acres by July 15,
- 50% of irrigated acres by August 15, and
- 90% of irrigated acres by August 31, with a maximum of eight inches of water to be applied to the remaining 10% of irrigated acres during the remainder of the irrigation season. This 10% can be on land previously fallowed.

To meet the conditions of this graduated cessation schedule, the petitioners propose to fallow three fields totaling 6.9 acres on July 15, 2025, which accounts for 19% of the total 35.7 acres. On August 15, 2025, irrigation will cease on an additional 11 acres, bringing the total irrigated acres with irrigation ceased for the season to 18 acres or 50% of the 35.7 acres associated with the proposal. Finally, on August 31, 2025, irrigation will cease on 16 additional acres, achieving cessation of irrigation on 34 acres or 95% of the total 35.7 acres, with no more than eight inches of water applied on the remaining 10% of irrigated acres covered by this groundwater local cooperative solution.

The proposal was posted to the State Water Board's webpage for the 2025 local cooperative solutions associated with the Regulation on April 10, 2025. A further description of the site and water reduction measures is provided in the application submitted for this proposal. The petitioners have selected not to work with a Coordinating Entity and agree to grant property access to State Water Board staff to verify compliance with the proposal, with 24-hour notice.

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 installation of a meter. 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 approve a time schedule for the installation of a meter if not currently installed at the start of the irrigation season.

The petitioners have installed a meter on Well #1 and will submit photos of monthly pumping records to the State Water Board by the 10th of each month during the irrigation season. The proposal provides that the metering requirement "is exempt" for Well #2 because it irrigates less than 30 acres and provides that daily records will be maintained to report pump times and duration of Well #2 by the 10th of each month during the irrigation season. The Division of Water Rights interprets the latter as a request for a waiver of the metering requirements for Well #2, pursuant to section 875, subdivision (f)(4)(D)(iii)(a), of the Regulation.

Approval

The Division of Water Rights has reviewed the local cooperative solution proposal for the 2025 through 2029 irrigation seasons and finds that it meets the requirements of Regulation section 875, subdivision (f)(4)(D), with the following conditions:

- Throughout the 2025-2029 irrigation seasons, the petitioners shall meter, record, and maintain a log of the water pumping and usage data from Well #1 on a weekly basis, consistent with the Regulation. The metering data for the groundwater wells shall be submitted to the State Water Board by the 10th of each month for the preceding month during each irrigation season covered by this conditional approval. The Division of Water Rights recognizes that implementation of the requirement for weekly recording of metering data may require operational adjustments, and will allow reasonable time to achieve full compliance, provided there is demonstrable progress towards meeting the weekly requirement.

Further, the Division of Water Rights grants the petitioners' request for a waiver of the metering requirement for groundwater Well #2, which is used to irrigate less than 30 acres.

Although approved for the 2025 through 2029 irrigation seasons, the approved local cooperative solution remains subject to revision in the event of any future amendments to the Regulation.

The petitioners' groundwater local cooperative solution 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 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
Acting Deputy Director for Scott-Shasta Local Cooperative Solutions
Division of Water Rights