

**From:** Simpson CIV John O

**Sent:** Friday, March 04, 2022 12:21 PM

**To:** Simonds,Keene

**Cc:** [AllBoard@SDCWAOffice365.onmicrosoft.com](mailto:AllBoard@SDCWAOffice365.onmicrosoft.com); Kerl, Sandy

**Subject:** Response to the Santa Margarita River Watershed Issues in SDCWA Comment Letter on Final MSR

Mr. Simonds,

I am writing to you as the Director of Water Resources at Camp Pendleton and as a member of the San Diego County Water Authority (SDCWA) Board of Directors. On page 5 of the attached comment letter, our SDCWA General Manager states the following:

“The passage of the SGMA expressed a legislative intent and urgency to address groundwater issues at a local level across California. The groundwater analysis for this MSR is needed now, not in a future report. This information is critical not only for the pending MSR and detachment analysis, but also for compliance with state law. The analysis would presumably include reference to the following elements.”

“Second, Fallbrook and Rainbow are part of the Santa Margarita Watershed adjudication finalized in 1963, with modification in 1966. The adjudication does not quantify groundwater rights but does confer the court jurisdiction to quantify rights in the future.”

Because this letter seeks to implore you to conduct a “groundwater analysis” by implying that there may be issues with “compliance with state law,” I need to elaborate on, and clarify a number of facts regarding the “Second” element discussed above.

- Fallbrook and Rainbow are indeed part of the Santa Margarita **River** Watershed adjudication
- The Santa Margarita River Watershed (SMRW) adjudication is overseen by a Federal court appointed Watermaster
- Per the requirements of SGMA, the SMRW Watermaster reports the status of all basins within the SMRW via the **Adjudicated Basins Annual Reporting System**
- The groundwater basin within the SMRW that has any pertinence to any analysis for Fallbrook and Rainbow is called the **Santa Margarita Valley Basin** (SMVB) under SGMA
- The SMVB is completely contained on Camp Pendleton
- The Water Resources Division (WRD) at Camp Pendleton is charged with sustainably managing the SMVB by Marine Corps Orders, Department of the Navy Orders and SGMA – water security = national security
- As such, we report the status of the SMVB bi-annually under the **California Statewide Groundwater Elevation Monitoring (CASGEM) Program** “to help achieve the goals set out under” SGMA
- While the court did not quantify the water rights of the parties within the SMRW in 1963, there are a number of settlements and cooperative water resource management agreements within the watershed that **do** quantify water rights and require sustainable water resource management
- **No** water is pulled from the SMVB under “groundwater rights,” in fact all rights within the SMRW apply to the water within the “younger alluvium” within the watershed because it is the integral link between the surface water and groundwater

- All water pulled from the SMVB and shared under a ***conjunctive use settlement agreement*** with Fallbrook (a project highlighted by the SDCWA as a resounding success and the way to manage water resources) is pulled under Riparian Water Rights granted by the State of California
- Camp Pendleton and Fallbrook from the SMVB under a shared very senior water right to 42,000 AF/yr and Camp Pendleton has an additional perfected license for 4000 AF/yr and a Pre-1914 right to 1100 AF/yr that is stored aboard Camp Pendleton in Lake O'Neill

Thus, I can assure you that any water from the Santa Margarita River Watershed pertinent to Fallbrook and Rainbow as eluded to on page 5 in the "Second" element of the SDCWA's letter requires no urgent "groundwater analysis" as part of your MSR or to determine if it is "in compliance with state law" (SGMA). Even though we are managing the Santa Margarita Valley Basin within an adjudicated watershed, we fully support and execute the mandates of SGMA.

If you do decide to conduct an type of "groundwater analysis" as it pertains to the SMVB, or if you have any questions, please to do not hesitate to call or email me.

Respectfully,

Dr. John Simpson, P.E.,  
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