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ELECTRONICALLY FILED
Superior Court of California,
County of San Diego

06/15/2018 at 03:22:00 PM

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Attorneys for Petitioners/Plaintiffs

13 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
14 COUNTY OF SAN DIEGO

16 CITY OF SAN DIEGO et al.

17 Petitioners/Plaintiffs,

19 v.

20 ELIZABETH MALAND, et al.,

22 Respondents/Defendants,

25 JACK McGRORY and STEPHEN P. DOYLE,

26 Real Parties in Interest.

CASE NO.: 37-2018-00023290-CU-WM-CTL

**DECLARATION OF GEORGE ADRIAN IN
SUPPORT OF PETITION FOR WRIT OF
MANDATE; COMPLAINT FOR JUDICIAL
DECLARATION THAT THE PROPOSED
SDSU WEST INITIATIVE CANNOT
LAWFULLY BE SUBMITTED TO VOTERS;
REQUEST FOR INJUNCTIVE RELIEF TO
RELIEVE CITY OFFICIALS FROM
OBLIGATION TO SUBMIT SDSU WEST
INITIATIVE TO VOTERS ON NOVEMBER
2018 BALLOT**

ELECTION MATTER

DATE: July 5, 2018
TIME: 9:00 a.m.
JUDGE: Hon. Randa Trapp
DEPT.: C-70

Case filed: May 11, 2018

1 I, George Adrian, make this declaration based on my own personal knowledge and, if called
2 upon to testify as a witness in this matter, I could and would testify competently to the matters stated
3 herein:

4 1. I am the Program Manager for the City of San Diego Long-Range Planning and Water
5 Resources Division of the Public Utilities Department. I have held this position continuously since
6 May, 2015. Prior to that I served as a Principal Water Resources Specialist in the same Division of the
7 Public Utilities Department for six years. Prior to that I served as an Associate Civil Engineer in the
8 same Division of the Public Utilities Department for nine years. I hold a Bachelor of Science degree in
9 mechanical engineering and a Master of Science degree in civil engineering from the San Diego State
10 University. I am a registered professional engineer.

11 2. In my role with the City of San Diego I oversee the Public Utilities Department's Water
12 Resource Planning and Watershed and Resource Protection sections. The work of the Water Resource
13 Planning section includes investigations of the City's groundwater resources. I am familiar with the
14 City's efforts to capture and use its existing groundwater resources.

15 3. I am familiar with the SDSU West Campus Research Center, Stadium and River Park
16 Initiative ("SDSU West Initiative"). I understand it will require the City of San Diego to sell to the state
17 university ("SDSU") 132 acres of land currently the site of the former Qualcomm Stadium previously
18 used by the San Diego Chargers.

19 4. The 132-acre site sits directly above one of the few groundwater aquifers located in the
20 City of San Diego. The 132-acre site is also part of the City of San Diego's long-standing plan to
21 increase use of groundwater as a part of a diversified water supply portfolio.

22 5. The City of San Diego imports approximately 85% of its water. This dependence on
23 imported water has created a reliability issue in that the imported sources have been and are subject to
24 risks such as conveyance failure, environmental restrictions, drought conditions, climate change and cost
25 increase. In 2002 and 2012, The City Council Adopted the Long-Range Water Resources Plan that
26 included diversification of water supply and development of local water resources including
27 groundwater. The Mission Valley Aquifer (MV Aquifer), located under the 132 acre stadium site, is one
28 of the few available groundwater basins that have been considered for local water supply development.

1 6. The MV Aquifer is fed by the San Diego River and from rain which percolates into the
2 aquifer. The City owned and operated a drinking water well field over the MV Aquifer from
3 approximately 1913 until roughly 1936 when the City built El Capitan reservoir and began storing
4 water. While in operation, the City's well field pumped up to 5 million gallons per day of groundwater
5 from the MV Aquifer and conveyed the extracted water to a water filtration plant on El Cajon
6 Boulevard.

7 7. The Water Quality Control Plan for the San Diego Basin (Basin Plan) has designated the
8 groundwaters of Mission Valley as a potential source of future municipal water. The basin has been
9 studied and analyzed over the years and it has an estimated sustainable yield of 2,200 acre-feet per year
10 (AFY) or roughly 2 million gallons per day, amount equivalent to serving 4,000 to 6,000 households per
11 year. The City has pueblo water rights to the water in this basin.

12 8. The City has been considering re-development of the MV Aquifer since as early as 1991
13 when Corrao Group produced "Summary of Groundwater Characteristics" as a part of a reservoir study.
14 In 2004, Dr. Michael Welch produced the "Mission Valley Brackish Groundwater Desalination Concept
15 Study" which sited and identified the potential for a 2 million gallon per day brackish desalination
16 facility on Water Fund property in the vicinity of Qualcomm Stadium. Through these and other studies,
17 the City has consistently demonstrated both intent and ability to develop the MV Aquifer for beneficial
18 use as a municipal water supply.

19 9. In addition to groundwater extraction, the City has also examined the feasibility of
20 incorporating stormwater capture and use in Mission Valley, which is prone to flooding during rain
21 events. In combination, these projects are known as the "Mission Valley Groundwater Project" and
22 directly involve the 132-acre site proposed to be sold to SDSU.

23 10. Currently, the City's Mission Valley Groundwater Project (MVGPP) envisions capturing,
24 treating, and storing surface water from dry and wet weather runoff in the aquifer through infiltration
25 and/or injection. When needed, the water stored within the MV Aquifer could then be pumped through
26 extraction wells and conveyed to a groundwater treatment facility for municipal use. In either case, close
27 proximity between the well field and treatment facility is necessary from both an engineering and
28 economic standpoint.

1 11. The MVGP calls for construction of six new wells and treatment facilities to pre-treat
2 surface runoff to adequately quality for infiltration and/or injection into the MV Aquifer, and to treat
3 groundwater to levels adequate for delivery to the City's water system. The Mission Valley runoff
4 pretreatment and groundwater treatment facilities may or may not be co-located on the same parcel with
5 the facilities of the City's Pure Water San Diego program (a separate City project to treat recycled water
6 for municipal use), depending on project timing, design, engineering, and economics, however, all the
7 facilities need to be in close proximity to the stadium site.

8 12. Three of the six new wells would be developed on the stadium property, as shown in
9 Exhibit K attached to this declaration. The well sites are all on property currently owned by the City's
10 Water Enterprise Fund (managed by the Public Utility Department). This property is part of the
11 proposed sale to the SDSU. Although the sites could be shifted slightly from the exact locations shown,
12 they need to retain their general location and spacing along the paleo channel of the San Diego River,
13 meaning three of the well sites would have to be located on the stadium site. Well site control would be
14 approximately 50-75 feet in diameter with a smaller area containing secure boundaries and with well
15 and pump equipment enclosed in appropriate structures.

16 13. In addition to the wells, pretreatment, and treatment facilities, the MVGP will also
17 require extensive infrastructure in the form of pipelines that would move water among the wells, pre-
18 treatment, treatment, and distribution systems in order to deliver this valuable water resource to San
19 Diego City residents. This infrastructure would be located at least in part on the stadium site.

20 14. From a geographical and economical perspective the City has limited options if it cannot
21 use the land it now owns at the stadium site. The aquifer cannot be moved. It is located directly under
22 the 132-acre site. The wells must be located on site to adequately inject into or extract water from the
23 aquifer. Infrastructure will need to be constructed to move the water off the 132 acre stadium site to the

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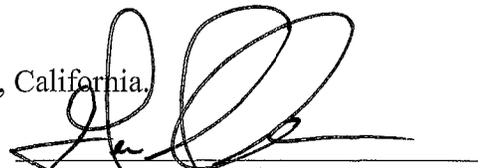
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1 municipal water system. Relocating any of the planned MVGP facilities will result in significant loss to
2 the City both in time and expense.

3 I declare under penalty of perjury under the laws of the State of California that the foregoing is
4 true and correct.

5 Executed this 14 day of June 2018, at San Diego, California.



George Adrian P.E.

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EXHIBIT K



Mission Valley Groundwater Feasibility Study 2018

PROJECT AREA OVERVIEW

Figure 1