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By Lee McAlister, Deputy Clerk

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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.,

21 Respondents/Defendants,

24  
25 CATHERINE APRIL BOLING,  
26 Real Party in Interest.

**CASE NO.: 37-2018-00023295-CU-WM-CTL**

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

**ELECTION MATTER**

DATE: July 13, 2018  
TIME: 1:30 p.m.  
JUDGE: Hon. Timothy Taylor  
DEPT.: C-72

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 San Diego River Park and Soccer City Initiative ("Soccer City  
16 Initiative"). I understand it will require the City of San Diego to lease to a qualified lessee about 233  
17 acres of land that includes the site of the former Qualcomm Stadium ("Stadium Site") and 20 acres of  
18 the training facilities previously used by the San Diego Chargers. The Soccer City Initiative also would  
19 allow the qualified lessee to purchase 79.9 acres of any parcel of the leased property.

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

23 5. The City of San Diego imports approximately 85% of its water. This dependence on  
24 imported water has created a reliability issue in that the imported sources have been and are subject to  
25 risks such as conveyance failure, environmental restrictions, drought conditions, climate change and cost  
26 increase. In 2002 and 2012, The City Council Adopted the Long-Range Water Resources Plan that  
27 included diversification of water supply and development of local of water resources including

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1 groundwater. The Mission Valley Aquifer (MV Aquifer), located under the Stadium Site, is one of the  
2 few available groundwater basins that have been considered for local water supply development.

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

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

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

21 9. In addition to groundwater extraction, the City has also examined the feasibility of  
22 incorporating stormwater capture and use in Mission Valley, which is prone to flooding during rain  
23 events. In combination, these projects are known as the "Mission Valley Groundwater Project" and  
24 directly involve the Stadium Site proposed to be leased for 99 years (and possibly sold).

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

1 proximity between the well field and treatment facility is necessary from both an engineering and  
2 economic standpoint.

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

10 12. Four of up to eight new wells would be developed on and adjacent to the Stadium Site,  
11 with three (MV-C, MV-D and MV-E) directly next to the existing football stadium and in the parking  
12 lot, and one in river park area (MV-B) of the proposed lease area, as shown in Exhibit B attached to this  
13 declaration. These four well sites are all on property currently owned by the City's Water Enterprise  
14 Fund (managed by the Public Utility Department). This property is part of the proposed lease site  
15 pursuant to the Soccer City Initiative. Although the well sites could be shifted slightly from the exact  
16 locations shown, they need to retain their general location and spacing along the paleo channel of the  
17 San Diego River, meaning three of the well sites would have to be located near the existing stadium.  
18 Well site control would be approximately 50-75 feet in diameter with a smaller area containing secure  
19 boundaries and with well and pump equipment enclosed in appropriate structures.

20 13. In addition to the wells, pretreatment facilities, and treatment facilities, the MVGP will  
21 also require extensive infrastructure in the form of pipelines that would move water among the wells,  
22 pre-treatment, treatment, and distribution systems in order to deliver this valuable water resource to San  
23 Diego City residents. This infrastructure would be located at least in part on the Stadium Site.

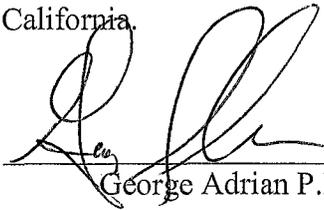
24 14. From a geographical and economical perspective the City has limited options if it cannot  
25 use the land it now owns at the Stadium Site. The aquifer cannot be moved. It is located directly under  
26 the Stadium Site. The wells must be located on the Stadium Site to adequately inject into or extract  
27 water from the aquifer. Infrastructure will need to be constructed to move the water off the Stadium Site

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1 to the municipal water system. Relocating any of the planned MVGP facilities will result in significant  
2 loss to 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 21 day of June 2018, at San Diego, California.

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9 George Adrian P.E.

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## EXHIBIT B



Mission Valley Groundwater Feasibility Study 2018

**PROJECT AREA OVERVIEW**

**Figure 1**