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County of San Diego  
**06/22/2018** at 11:47:00 AM  
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By Lee McAlister, Deputy Clerk

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15  
16 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA  
17  
18 COUNTY OF SAN DIEGO

19 CITY OF SAN DIEGO et al.

20 Petitioners/Plaintiffs,

21 v.

22 ELIZABETH MALAND, et al.,

23 Respondents/Defendants,

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

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

**DECLARATION OF AMY DORMAN 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, Amy Dorman, make this declaration based on my own personal knowledge and, if called upon  
2 to testify as a witness in this matter, I could and would testify competently to the matters stated herein:

3 1. I am the Project Delivery Manager for the City of San Diego Pure Water Program. I have  
4 held this position continuously since October, 2014. Prior to that I served as a Senior Civil Engineer in  
5 the City of San Diego's Long-Range Planning and Water Resources Division of the Public Utilities  
6 Department. I hold a bachelor's degree in mechanical engineering from the University of California at  
7 Berkeley and a master's degree in business administration from San Diego State University.

8 2. In my role with the City of San Diego I am familiar with the City's efforts to recycle and  
9 use its existing water resources. Those efforts include my oversight of the City's Pure Water Program  
10 described below.

11 3. I am familiar with the San Diego River Park and Soccer City Initiative ("Soccer City  
12 Initiative"). I understand it will require the City of San Diego to lease to a qualified lessee  
13 approximately 233 acres of City owned property currently the site of the former Qualcomm Stadium  
14 ("Stadium Site") and 20 acres that are a portion of the former training facility site, both previously used  
15 by the San Diego Chargers. I also understand that the qualified lessee has the option to purchase up to  
16 79.9 acres of the leased property.

17 4. The City of San Diego has a long-standing plan to diversify the City's water supply  
18 portfolio as well as an ongoing project to convert recycled water into clean drinking water.

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

24 6. A project that is of great importance to San Diego's economic vitality and public health is  
25 a 20 year project known as Pure Water San Diego, which is the City's phased, multi-year program that  
26 will provide one-third of San Diego's water supply locally by 2035. I manage this program for the City.  
27 The Pure Water Program will use proven water purification technology to recycle wastewater into safe,  
28 high-quality drinking water. The program offers a cost-effective investment for San Diego's water needs

1 and will provide a reliable, sustainable water supply. I have attached to this declaration as Exhibit C  
2 excerpts from the City's website describing the relevant aspects of the Pure Water program.

3 7. When implemented, Pure Water Phase I (which is focused on the Northern area of the  
4 City) will deliver 30 million gallons per day of purified water to Miramar Reservoir. The purified water  
5 will blend with the City's imported and local water sources before it is treated again at the Miramar  
6 Drinking Water Treatment Plant and distributed to the public. Phase I is scheduled to be completed by  
7 2021.

8 8. Phase II of the Pure Water program will focus on the Central area of the city, including  
9 Mission Valley where the Qualcomm Stadium now is located.

10 9. The Pure Water Program will include construction and operation of new advanced water  
11 purification facilities, pump stations and pipelines, and improvements to existing treatment plants. The  
12 plan envisions that recycled water will be treated at an advanced water purification facility which  
13 current plans locate on the Stadium Site. Treated water would then be conveyed to one of the City's  
14 water supply reservoirs; options that will be evaluated during Phase II planning efforts include the San  
15 Vicente and Murray Reservoirs. In addition, it is possible that the City would use the existing aquifer  
16 directly under the Stadium Site as a storage site of treated water, although that determination is yet to be  
17 made. However the water is stored, the water will blend with the City's local and imported sources  
18 before it is treated again at the City's Alvarado Water Treatment Plant and distributed to the public.

19 10. The City has conducted studies on the location for the advanced water purification  
20 facility (AWPF) to be built in Mission Valley as part of Phase II of the Pure Water Program. The results  
21 of that study concluded there were limited options for location of the facility and that the best location  
22 for the new advanced water purification facilities, pump stations and pipelines, and improvements to  
23 existing treatment plants were on the Stadium Site proposed to be leased to a qualified lessee under the  
24 terms of the Soccer City Initiative.

25 11. From a geographical and economical perspective the City has limited options in terms of  
26 where to place the advanced water purification facility and required infrastructure. If the City has to

27 ///

28 ///

1 relocate the planned advanced water treatment facility this will result in significant loss to the City both  
2 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<sup>st</sup> day of June 2018, at San Diego, California.

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7   
8 Amy Dorman

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# EXHIBIT C

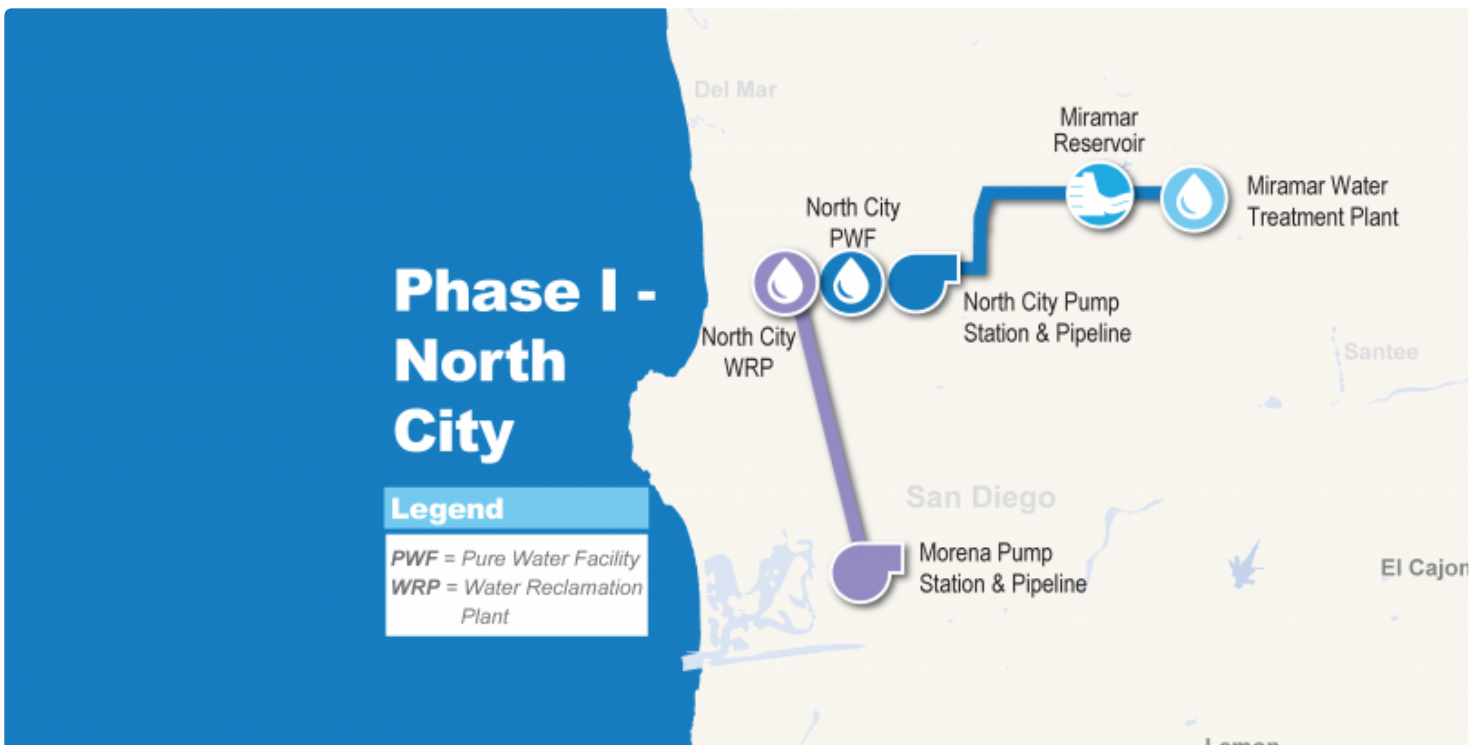
# Water

## Pure Water San Diego



Pure Water San Diego is the City's phased, multi-year program that will provide one-third of San Diego's water supply locally by 2035. The Pure Water Program will use proven water purification technology to clean recycled water to produce safe, high-quality drinking water. The program offers a cost-effective investment for San Diego's water needs and will provide a reliable, sustainable water supply.

If you have additional questions about the Pure Water San Diego Program, please call 619-533-7572 or email [purewatersd@sandiego.gov](mailto:purewatersd@sandiego.gov) (<mailto:purewatersd@sandiego.gov>).



Pure Water San Diego Program



### Why is Pure Water San Diego Being Implemented?

San Diego relies on importing 85% of its water supply from the Colorado River and Northern California Bay Delta. The cost of this imported water has tripled in the last 15 years and continues to rise. With limited local control over its water supply, the City of San Diego is more vulnerable to droughts, climate change and natural disasters.

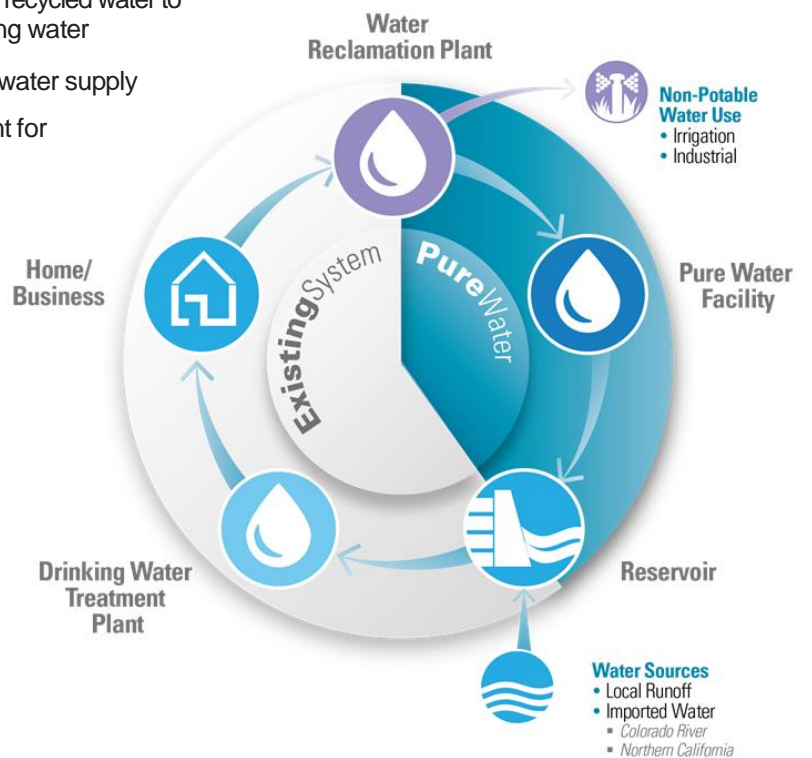
### What is Pure Water San Diego?

Pure Water San Diego is a phased, multi-year program that will provide 1/3 of San Diego's water supply locally by 2035. The Pure Water Program:

- Uses proven technology to clean recycled water to produce safe, high-quality drinking water
- Provides a reliable, sustainable, water supply
- Offers a cost-effective investment for San Diego's water needs

### How Does the Pure Water Program Work?

With San Diego's existing water system, only 8% of the wastewater leaving homes and businesses is recycled; the rest is treated and discharged into the ocean. The Pure Water Program transforms the City's water system into a complete water cycle that maximizes our use of the world's most precious resource—water.





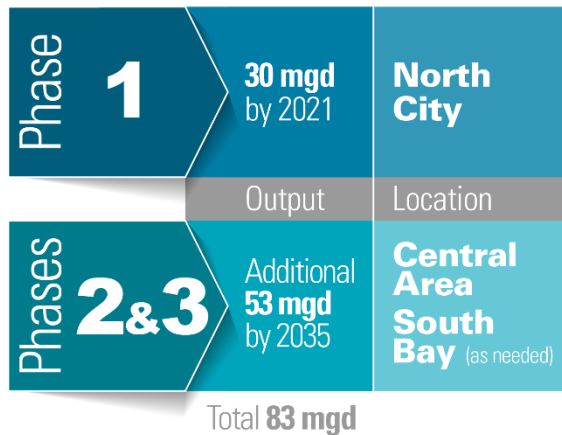
# Where is the Pure Water Program?

The Pure Water facilities will be located throughout the City of San Diego and are grouped into three geographical areas to facilitate implementation: North City, Central Area and South Bay (shown on map).

Construction on the Phase 1 North City projects will start in 2019.

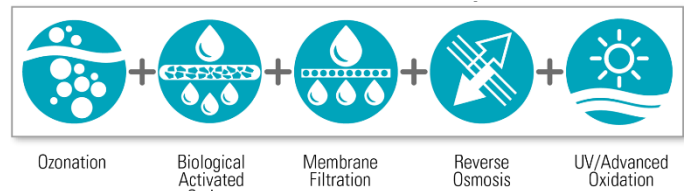


## When will the New Facilities be Built?



\*mgd = million gallons per day

## What are the Steps of the Water Purification Process?



Since June 2011, the City has produced 1 million gallons of purified water every day at its demonstration Pure Water Facility.

More than 30,000 water quality tests have confirmed the water is safe and meets all federal and state drinking water standards.

Local **residents**, community **groups**, environmental **organizations** and local **businesses** support the **Pure Water Program**.

Do you **support Pure Water?** Like us, follow us:



@PureWaterSD

## Want to Know More?

Visit [www.PureWaterSD.org](http://www.PureWaterSD.org) to sign up for a free tour of the Pure Water Facility or request a presentation for your organization.







## What is Pure Water San Diego?

Pure Water San Diego is the City's phased, multi-year program that will provide one-third of San Diego's water supply locally by 2035. The Pure Water Program uses proven technology to clean recycled water to produce safe, high-quality drinking water.

## What are the steps to purify recycled water?

The water purification process includes five steps: ozonation, biological activated carbon filters, membrane filtration, reverse osmosis, and ultraviolet disinfection with advanced oxidation.

## How was it determined that purifying recycled water is safe?

The City conducted a demonstration project (2009-2013) that confirmed the purified water meets all federal and state drinking water standards.

During a one-year testing period, more than 9,000 laboratory tests were conducted at the City's 1-million-gallon-per-day test facility on 342 chemical and microbial constituents and water quality parameters. To date, more than 28,000 tests have been conducted, and the Division of Drinking Water and the San Diego Water Board support the City's plan to blend the purified water with imported water supplies in a local reservoir.

## Are pharmaceuticals and personal care products removed in the water purification process?

Yes. The presence of pharmaceuticals and personal care products are monitored at every step.

Results show the reverse osmosis and advanced oxidation processes are particularly effective at removing pharmaceuticals and personal care products. All test results showed the levels were well below EPA Health Reference levels or at non-detection levels.

## When will water purification facilities be built? When will the water be part of the drinking water supply?

An initial 30-million-gallon-per-day water purification facility is scheduled to come online in 2021. This facility will be located across the street from the North City Water Reclamation Plant, and the purified water produced will be piped to the Miramar Reservoir to blend with San Diego's imported water sources. From there, the blended water will be cleaned again at a drinking water plant before being sent to our taps.

By 2035, the City will produce 83 million gallons of purified water every day, which is equal to one-third of San Diego's future water supply needs. At full build out, the purified water will be distributed to all communities in the City of San Diego.

## Why has the City moved forward with the Pure Water Program instead of other options like desalination?

From 2004 to 2006, the City conducted a Water Reuse Study that included a public participation process. The study determined that water purification with reservoir augmentation was the preferred option for the City of San Diego. The City also conducted a Recycled Water Study and a Water Purification Demonstration Project to determine that the project was feasible and cost effective for San Diego. The reports for each of these studies can be found at [purewatersd.org/reports](http://purewatersd.org/reports).

## What is the cost of purified water?

The cost is estimated to be \$1,700 to \$1,900 per acre-foot. This equates to less than one penny per gallon. With the current cost of imported water (\$1,200 to \$1,400) expected to double in the next ten years, water purification will ultimately be a more cost-effective option.

### How will purified water affect the quality of water in the Miramar Reservoir?

The addition of the purified water to the Miramar Reservoir will meet all regulatory requirements for dilution in the reservoir. It will not negatively affect the reservoir's water quality.

### Is the Pure Water Program "toilet to tap"?

"Toilet to tap" does not accurately describe the water purification process. Water goes through numerous treatment steps and is subject to strict testing requirements before it would ever return to drinking water taps. In California, all forms of water are highly regulated and monitored to ensure safety. Since there is no new water on Earth, all water goes through a natural cycle and is essentially recycled water before it is treated and tested and then returned to homes and businesses as drinking water.

### How does water purification compare with desalination?

Desalination is an important part of San Diego's water portfolio. The San Diego County Water Authority (SDCWA) operates a 50-million-gallon-per-day desalination plant in Carlsbad that accounts for seven percent of the region's water supply.

In comparison to the Pure Water Program, it takes almost 50 percent more energy to desalinate ocean water due to its high salt content. Similarly, desalination produces 46 percent more greenhouse gas emissions than the Pure Water Program. According to SDCWA's website, the cost for desalinated water is \$2,131 to \$2,367 per acre-foot.

### How much water do San Diegans use per day?

San Diegans use approximately 180 million gallons of water per day. Individually, San Diegans use an average of 65 gallons per day (most of which is for outdoor/irrigation purposes).

### What other places have implemented water purification projects?

The multi-barrier water purification process has already been proven to protect public health. The Orange County Groundwater Replenishment System has successfully used a similar water purification process to San Diego since 2008. Other places in various stages of implementing projects include Singapore, Australia, Virginia, Texas and numerous other California cities.

### How does the Point Loma Wastewater Treatment Plant fit in with the Pure Water Program?

Point Loma is capable of treating 240 million gallons of wastewater per day. The Federal Clean Water Act requires wastewater treatment plants treat to secondary treatment level; however, San Diego has a permit that allows the City to treat to advanced primary level. Upgrading the plant to secondary standards would cost \$1.8 billion. Investing in the Pure Water Program and seeking federal legislation to allow San Diego to meet modified secondary standards would eliminate the necessity for costly upgrades to Point Loma and would decrease the amount of water that is discharged to the ocean.

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@PureWaterSD

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