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August 18, 2025

Via Email and U.S. Certified Mail
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City of San Diego, City Council
c/o Diana J.S. Fuentes, City Clerk
202 C St., Second Floor
San Diego, CA 92101

Re: *Notice of Intent to Commence CEQA Lawsuit; Klauber Project*
A Decision Made July 15, 2025 at the City Council as Agenda Item No. 332

To Whom It May Concern:

PLEASE TAKE NOTICE, under California Public Resources Code section 21167.5, that Petitioner, Chollas Valley Community Planning Group (“CVCPG”), intends to immediately file a Petition for Writ of Mandate (“Petition”) under the provisions of the California Environmental Quality Act (“CEQA”) against the City of San Diego (“City”).

The Petition will be filed in San Diego County Superior Court and will allege, inter alia, that the City failed to comply with CEQA when it approved the Klauber Project (Project No. PRJ-0693289, at 1362 Klauber Avenue). The Petition will further allege that the City improperly relied on CEQA Guidelines section 15183 to exempt the Klauber Project from project-level environmental review, despite the Project’s inconsistencies with applicable zoning and community plan designations and the presence of site-specific impacts that were not analyzed in the prior Encanto Neighborhoods Community Plan Program EIR.

Among other things, the Petition will request that the court direct the City to vacate and rescind the Tentative Map, Site Development Permit, Neighborhood Development Permit, and CEQA determinations for the Klauber Project, and to otherwise comply with CEQA. The Petition will also seek Petitioner’s costs and attorneys’ fees.

Sincerely,



Craig A. Sherman