

1 Everett L. DeLano, III (Calif. Bar No. 162608)  
Isabela Rodriguez (Calif. Bar No. 336015)

2 **DELANO & DELANO**  
3 104 W. Grand Avenue, Suite A  
4 Escondido, California 92025  
5 Tel: (760) 741-1200  
6 Fax: (760) 741-1212

7 Attorneys for Petitioner

Governor's Office of Planning & Research  
SEP 17 2021  
STATE CLEARINGHOUSE

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
9 **COUNTY OF SAN DIEGO**

10  
11 PQ-NE ACTION GROUP, a non-profit  
12 corporation,

13 Petitioner,

14 vs.

15 CITY OF SAN DIEGO, a public body corporate  
16 and politic, and DOES 1 through 5, inclusive,

17 Respondents,

18 CARMEL PARTNERS, LLC, a limited liability  
19 company, CARMEL LAND, LLC, a limited  
20 liability company, and DOES 6 through 10,  
21 inclusive,

22 Real Parties in Interest.

Case No. 37-2021-00033583-CU-TT-CTL  
Assigned to: Hon. Ronald F. Frazier

**NOTICE TO RESPONSIBLE AGENCIES**

(California Environmental Quality Act)

Complaint filed: August 5, 2021  
Trial Date: not set

1 **TO THE AGENCIES LISTED BELOW:**

2 Please take notice that PQ-NE ACTION GROUP, a non-profit corporation, has commenced  
3 an action in California Superior Court under the California Environmental Quality Act ("CEQA")  
4 against the City of San Diego ("City") to challenge the approval by the City of the Junipers Project  
5 ("Project"), and the related failure to comply with the California Environmental Quality Act  
6 ("CEQA"), Pub. Res. Code § 21000, *et seq.*

- 7 1. U.S. Fish and Wildlife Service  
8 610 W Ash Street, Room 1103  
9 San Diego, CA 92101
- 10 2. U.S. Environmental Protection Agency  
11 75 Hawthorne Street  
12 San Francisco, CA 94105
- 13 3. U.S. Army Corp of Engineers  
14 8775 Aero Drive, Room 232  
15 San Diego, CA 92123
- 16 4. State Clearinghouse  
17 1400 10th Street, Room 12  
18 Sacramento, CA 95814
- 19 5. Caltrans Planning, District 11  
20 4050 Taylor St.  
21 San Diego, CA 92110
- 22 6. California Department of Fish and Game  
23 3883 Ruffin Road  
24 San Diego, CA 92123
- 25 7. California Environmental Protection Agency  
26 P.O. Box 2815  
27 Sacramento, CA 95812
- 28 8. California Regional Water Quality Board, Region 9  
2375 Northside Drive, Suite 100  
San Diego, CA 92108
9. California Department of Water Resources  
P.O. Box 942836  
Sacramento, CA 94236-0001


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1 10. California Highway Patrol  
2 601 North 7th Street  
3 Sacramento, CA 95811

4 Among other things, the petition will seek to set aside the City's approval of the Project. This  
5 notice is provided pursuant to Pub. Res. Code § 21167.6.5(c).

6 DATED: September 14, 2021

Respectfully submitted,  
DeLano & DeLano

7  
8 By:   
9 \_\_\_\_\_  
10 Everett L. DeLano III  
11 Isabela Rodriguez  
12 Attorneys for Petitioner  
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1 **PROOF OF SERVICE**

2 *PQ-NE Action Group v. City of San Diego*

3 I, the undersigned, declare: I am over the age of 18 years and not a party to this action. I am  
4 employed in the County of San Diego, California, in which county the within mentioned service  
5 occurred. My business address is 104 W. Grand Avenue, Suite A, Escondido, CA 92025.

6 On September 14, 2021, I served a copy of **NOTICE TO RESPONSIBLE AGENCIES** to  
7 the parties below via the method described above:

8  (BY MAIL CCP § 1013) I served the individual named by placing the  
9 documents in a sealed envelope. I then placed it for collection and mailing with the United  
10 States Postal Service this same day, at my address shown above, following ordinary business  
11 practices.

12  (BY ELECTRONIC SERVICE [CCP § 1010.6]) I caused to be served by  
13 electronically mailing a true and correct copy through electronic mail system to the e-mail  
14 addressee(s) set forth above, or as stated per agreement in accordance with Code of Civil  
15 Procedure section 1010.6.

16  (BY OVERNIGHT DELIVERY [CCP § 1013]) I served the individual(s) named by  
17 placing a true and correct copy of the documents in a sealed envelope(s) to be delivered  
18 overnight via an overnight delivery service in lieu of delivery by mail to the addressee(s) listed  
19 above, or as stated on the attached service list:

20  (BY ELECTRONIC SERVICE) By submitting an electronic version of the  
21 document(s) to One Legal, LLC through the user interface at <https://www.onelegal.com/>.

22 U.S. Environmental Protection Agency  
23 75 Hawthorne Street  
24 San Francisco, CA 94105

U.S. Army Corp of Engineers  
8775 Aero Drive, #232  
San Diego, CA 92123

25 State Clearinghouse  
26 1400 10th Street, Room 12  
27 Sacramento, CA 95814

Caltrans Planning, District 11  
4050 Taylor St.  
San Diego, CA 92110

28 California Department of Fish and Game  
3883 Ruffin Road  
San Diego CA 92123

California Environmental Protection Agency  
P.O. Box 2815  
Sacramento, CA 95812

California Regional Water Quality Board,  
Region 9  
2375 Northside Drive, Suite 100  
San Diego, CA 92108

California Department of Water Resources  
P.O. Box 942836  
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1 California Highway Patrol  
2 601 North 7th Street  
3 Sacramento, CA 95811

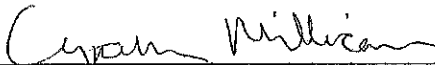
California Attorney General  
Service Deputy  
300 South Spring St.  
Los Angeles, CA 90013

4 Mara W. Elliott, City Attorney  
5 George F. Schaefer, Asst. City Attorney  
6 Benjamin P. Syz, Deputy City Attorney  
7 Office of the City Attorney  
8 1200 Third Avenue, Suite 1100  
9 San Diego, CA 92101-4100

Jeffrey A. Chine Esq.  
Heather S. Riley, Esq.  
Allen Matkins Leck Gamble Mallory & Natsis LLP  
600 West Broadway, 27th Floor  
San Diego, CA 92101-0903

Attorneys of Record for Real Parties in Interest  
CARMEL PARTNERS, LLC, and CARMEL  
LAND, LLC

10 I declare under penalty of perjury under the laws of the State of California that the foregoing  
11 is true and correct. Dated this September 14, 2021 at Escondido, California,

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13   
14 Cindy Millican