

September 18, 1998

Mr. Bruce Kaneshiro  
Environmental Science Associates  
225 Bush Street, Suite 1700  
San Francisco, CA 94104

Subject: Comments on Draft EIR for PG&E's Application for Authorization to Sell Certain  
Generating Plants and Related Assets - Application No. 98-01-008

Dear Mr. Kaneshiro:

Thank you for providing the East Bay Regional Park District ("District") with a copy of the Draft EIR for the subject project. We have reviewed the EIR and provide the following comments for consideration by the California Public Utilities Commission.

[Begin G1]

As noted in the Draft EIR, the District has a variety of existing and proposed park and trail facilities in the East Bay that are in close proximity to two of the generating plants that are proposed for sale. These two plants are the Pittsburg and the Contra Costa Power Plants. It does not appear that the sale of the Contra Costa Plant would have an adverse effect on District facilities, however, sale and reuse of the Pittsburg facility may have the potential to adversely affect our park facilities at Bay Point, near Pittsburg.

The District recently obtained a grant from CALFED for the planning and design of a tidal marsh restoration project that is focused on restoring and enhancing habitat for the Delta smelt. As noted on page 4.78-35 of the Draft EIR under Impact 4.7-2, cooling water system operations of the Pittsburg facility may adversely affect the success of this restoration project. Any change in operations of this facility that would affect the availability, quality, temperature or salinity of the discharge waters could have an adverse effect on Delta smelt and other special-status fish species in the vicinity of our Bay Point facility. These potential effects and suitable mitigation measures should be carefully evaluated in the EIR and the Section 10 permit analysis.

[End G1]

Thank you for the opportunity to comment on the draft EIR. If you have any questions, please contact me at (510) 635-0138 extension 2622.

Sincerely,

/s/

Brad Olson  
Environmental Specialist

## G. EAST BAY REGIONAL PARK DISTRICT

- G1 The impacts of future changes in operation, such as increased generation, at the Pittsburg Power Plant will either fall under the provisions of the National Pollutant Discharge Elimination System and Section 10 effluent limitations, or the new owners will have to apply for new permits. In either case, discharges from the power plant will be controlled by the Regional Water Quality Control Board, the U.S. Fish and Wildlife Service, and other regulatory agencies.