

November 12, 1998

Mr. Andrew Barnsdale, Project Manager
c/o Environmental Science Associates
225 Bush Street, Ste. 1700
San Francisco, CA 94104

SUBJECT: SDG&E DIVESTITURE MITIGATED ND COMMENTS

Dear Mr. Barnsdale:

The San Diego Unified Port District acknowledges receipt of the Notice of Publication for the California Public Utilities Commission's (CPUC) *Mitigated Negative Declaration and Initial Study for San Diego Gas & Electric Company's Application No. 97-12-039 Proposal for Divestiture*.

[Begin C1]

While the Port District may consider the CPUC's Mitigated Negative Declaration before reaching a final decision on its proposed acquisition of the South Bay Power Plant and related facilities, the Port District's proposed purchase and continued operation of the existing facilities until they can be closed and decommissioned is eligible for a Class 1 categorical exemption pursuant to CEQA Guidelines Section 15301(b).

[End C1]

The following are more specific comments related to the content of the Mitigated Negative Declaration.

[Begin C2]

Page 4.1-10, 4.1-24

The discussion regarding pertinent planning documents for the South Bay Power Plant neglects to discuss the importance of the Port's jurisdictional influence on the power plant and its surrounding area. The Port's jurisdictional boundary includes land and water area located west of the historic mean high tide line. Within the Chula Vista Bayfront – Planning District 7, there is a small parcel of upland leased to the power plant which is designated "Marine Related Industrial." In addition, the power plant leases water area from the Port for purposes of the of the cool water intake and warm water outfall channels. The SDG&E dike which is used to separate these channels and provides access to the Chula Vista Wildlife Reserve, is also leased from the Port for power plant operations. The Chula Vista Wildlife Reserve, dike, and surrounding water area are designated as "Conservation" areas with the intent to preserve, maintain and enhance natural habitat areas so that biological productivity will be sustained. The new owner of the power plant would be required to enter into lease agreement for the upland, water, and dike area.

[End C2]

[Begin C3]

Page 4.1-30

The San Diego Unified Port District Master Plan was last updated March 1998.

[End C3]

[Begin C4]

Page 4.7-11

As mentioned earlier, the Port has jurisdictional authority over the adjacent water area and the Chula Vista Wildlife Reserve. Agreements to control and limit access to the Chula Vista Wildlife Reserve must be made with the Port.

[End C4]

[Begin C5]

Page 4.7-12

Please refer to the Chula Vista Wildlife Island as the Chula Vista Wildlife Reserve.

[End C5]

If you have any questions regarding the comments provided, please feel free to contact me at (619) 686-6471.

Sincerely,

/s/

MELISSA A. MAILANDER
Environmental Review Coordinator

cc: Dan Wilkens
Tom Morgan
David Chapman

C. PORT OF SAN DIEGO

C1 Comment noted.

C2 Page 4.1-22 of the Initial Study, the following paragraph is hereby added as the second paragraph under the South Bay Power Plant heading:

The San Diego Unified Port District (Port) maintains jurisdiction of land and water located west of the historic mean high tide line. The South Bay Power Plant is located within the Chula Vista Bayfront - Planning District 7 of the Port Master Plan. There is a small upland parcel within the west portion of the South Bay Power Plant leased by the Port to SDG&E which is designated as “Marine Related Industrial.” In addition, SDG&E leases water area from the Port for purposes of the cool water intake and warm water outfall channels. A SDG&E dike, used to separate these channels and provide access to the Chula Vista Wildlife Reserve, is also leased from the Port. The reserve, dike and surrounding water areas are designated in the Port Master Plan as “Conservation” areas, with the intent to preserve, maintain and enhance natural habitat areas. As part of the sale of the plant, SDG&E would assign the lease of the upland, water and dike areas to the new owner (unless if the Port were the new owner, in which case the title for the plant property would be merged with the lease holdings) (Dodson, 1998b). Since no changes in land use are expected from the project, the plant would be continue to be consistent with the Port Master Plan.

On page 4.1-29 of the Initial Study, the following is added to the list of References:

Dodson, James, Sempra Energy, Inc., telephone conversation, November 20, 1998b.

C3 Comment noted.

C4 Please see response to Comment A4.

C5 The term “Chula Vista Wildlife Island” is hereby revised to “Chula Vista Wildlife Reserve” throughout the Mitigated Negative Declaration and Initial Study.