

November 12, 1998

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

Dear Mr. Barnsdale:

SUBJECT: Letter of Comment on the California Public Utilities Commission (CPUC) Draft Mitigated Negative Declaration (DMND) for San Diego Gas & Electric's (SDG&E's) Proposed Divestiture of Generating Facilities (LDR No. 98-15).

Thank you for the opportunity to comment on the California Public Utilities Commission (CPUC) Initial Study and Draft Mitigated Negative Declaration (DMND) for San Diego Gas & Electric (SDG&E's) Proposed Divestiture of Generating Facilities (LDR No. 98-15).

The City of San Diego has reviewed the DMND and offers the following comments:

[Begin E1]

1. The Hazards discussion (Section 4.9 of the Initial Study) should indicate whether the Phase I and Phase II Environmental Site Assessment reports are considered to be adequate by the reviewing agencies (San Diego Department of Environmental Health, Hazardous Materials Management Division and Regional Water Quality Control Board). Any remediation actions recommended by these reports should be presented to new or prospective owners so the measures can be included as project features in development plans for the sites proposed for divestiture.

[End E1]

[Begin E2]

2. New or prospective owners of property proposed for divestiture within the City of San Diego should be advised to submit projects to the City so that any land use proposals can be reviewed for consistency with relevant community plans. Additionally, the projects should be presented to community planning groups responsible for providing input for the particular area(s) under their jurisdiction.

[End E2]

Otherwise, the City of San Diego concurs with the conclusions and recommended Mitigation Monitoring and Reporting Program of the DMND. If there are any questions, please contact me at (619) 236-6301.

Sincerely,

/s/

JEANNE KROSCH
Senior Planner

JA:dmn

cc: Coleen Frost, Community and Economic Development
EAS File

E. CITY OF SAN DIEGO

- E1 The Phase I and Phase II Environmental Site Assessments are documents prepared by SDG&E in the interest of full disclosure to prospective buyers. They were not prepared for any public agency, and are not subject to “review for adequacy” by any agency. However, the documents have been made available to the public and are available for inspection by the San Diego Department of Environmental Health and the Regional Water Quality Control Board.

The entire contents of the Site Assessments, including proposed remediation measures, have been presented to prospective buyers so that the measures can be included as project features in any development plans for the divested sites.

- E2 This comment is now part of the Initial Study, which parties interested in bidding for SDG&E’s generating assets will have the benefit of reviewing and so will be advised of the commenter’s interest.