

May 4, 2009

6377

Mr. Jensen Uchida
California Public Utilities Commission
Energy Division
505 Van Ness Avenue
San Francisco, California 94102

Subject: NextG Networks of California Inc. (NextG) Application for Authority to Engage in Ground-Disturbing Outside Plant Construction in the City of Huntington Beach (Application No. A09-03-007) Completeness Review

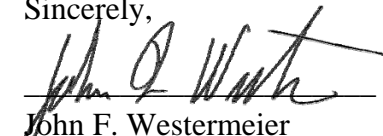
Dear Mr. Uchida:

Dudek has reviewed the subject Application, including the Proponent's Environmental Assessment (PEA) dated March 2009. The California Public Utilities Commission's (CPUC) Information and Criteria List and PEA Checklist were used as a basis for evaluating completeness and ensuring that sufficient information has been provided to the CPUC to complete environmental analysis for the subject project, as required by the California Environmental Quality Act (CEQA).


Based on Dudek's review of the PEA, we find that there are a number of items needed in order to conduct the environmental analysis for the subject project. Attachment A identifies the various deficiency items and requests additional information that will be used for significance determination and to support the findings of the CEQA document.

If you have any questions regarding this letter or need additional information, please contact me at 949.450.7982 or jwestermeier@dudek.com.

Sincerely,


John F. Westermeier
Senior Project Manager

The enclosed material has been reviewed by a Technical Editor:


Cynthia Cohen
Technical Editor

cc: John Porteous, Dudek

Att: Attachment A – Proponent's Environmental Assessment Review of Completeness

ATTACHMENT A

NextG Ground-Disturbing Outside Plant Construction Huntington Beach, California Application No. A09-03-007

Proponent's Environmental Assessment Review of Completeness

May 4, 2009

CHAPTER 2: PROJECT PURPOSE AND NEED

Please provide the following:

1. Would any extensions or other facilities not described in the Application be required to meet project objectives?

CHAPTER 3: PROJECT DESCRIPTION

Appendix A (NextG Huntington Beach Network Map) lacks sufficient detail or resolution to determine the precise location of project facilities. Please provide the following:

1. Project map(s), to scale, in hard-copy and digital formats, including the following data:
 - Work areas required, including staging areas and boring sites
 - County and City boundaries
 - Coastal Zone boundary
 - Drainage crossings
 - Schools
 - Airstrips (public/private).
2. For new and replacement poles, please provide schematic so that the bulk and scale can be ascertained. Please describe comparison between new and replacement poles with existing poles.
3. Please provide rationale for proposed location of aboveground facilities.
4. Please provide construction schedule, anticipated number of workers, and construction equipment that would be required.

ATTACHMENT A (Continued)

CHAPTER 4: ENVIRONMENTAL SETTING AND IMPACT ASSESSMENT

Chapter 4.1: Aesthetics

1. Please provide visual simulations (before and after) of communication nodes on existing pole (HB No. 13), new pole (HB No. 14), and replacement pole (HB No. 5).

Chapter 4.7: Hazards and Hazardous Materials

1. The Proponent's Environmental Assessment (PEA) states that no known hazardous material sites are located within the project boundary. Please describe the basis for this conclusion.
2. Please evaluate whether new or replacement poles would interfere with public/private airports. Please identify height of proposed poles and closest proximity to airstrips and airports.

Chapter 4.8: Hydrology and Water Quality

1. Please provide depth of groundwater in areas proposed for new and replacement poles as well as undergrounding.
2. Please provide means of dewatering if necessary.
3. PEA states that boring may be required to cross streams. Please identify all drainage crossings.

Chapter 4.9: Land Use and Planning

1. Please provide a description of General Plan designations for all proposed facilities.
2. Are any project facilities within the Coastal Zone, and do any project facilities require Coastal Development Permits?
3. Please provide an analysis of the consistency of the project with the City's Local Coastal Plan.

ALTERNATIVES

1. The PEA states that NextG considered a number of potential locations for the proposed project. Please provide a description of the alternative locations considered and the rationale for rejecting these.

ATTACHMENT A (Continued)

2. Please describe a possible Undergrounding Alternative, including undergrounding of both the aerial lines and nodes. Would this alternative be feasible, and would it meet most project objectives?
3. Please describe a Reduced Project Alternative that would eliminate new poles. Under this alternative, how would the elimination of proposed new poles in Huntington Beach affect NextG's system and project objectives?
4. Please describe the No Project Alternative: Under this alternative, how would the elimination of proposed facilities in Huntington Beach affect NextG's system and project objectives?
5. Please describe the feasibility of other alternatives, including use of existing fiber optic conduits, use of cell phone towers, or placement of the Distributed Antenna System (DAS) on existing buildings.

APPENDICES

1. Please provide any letter reports or survey memos regarding cultural resources or biological resources.
2. Please see previous note under Chapter 3 regarding Appendix A.