



SAN FRANCISCO PLANNING DEPARTMENT

Certificate of Determination EXEMPTION FROM ENVIRONMENTAL REVIEW

Case No.: 2010.0944E
Project Title: AT&T "Lightspeed" Network Upgrade
Block/Lot: Multiple Locations
Project Sponsor: Michael Edwards, AT&T California, (415) 644-7043
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PROJECT DESCRIPTION:

AT&T proposes to upgrade its residential communications network to a high-speed data transmission technology referred to as "Lightspeed," which would enable new services, including internet protocol television. To provide these new services, AT&T would expand its fiber-optic network throughout the City by placing additional fiber through its existing copper conduit currently used for telephone lines. Specifically, AT&T would install up to 726 metal, either tan or light green, 51.7-inches-wide by 26-inches-deep by 48-inches-high communications cabinets in the public right-of-way to house the Lightspeed electronics. The precise locations of the proposed new cabinets have not been identified; however, all new cabinets would be located within 300 feet of an existing AT&T Serving Area Interface (SAI) cabinet, also

(Continued on next page.)

EXEMPT STATUS:

Categorical Exemption, Class 3 [State CEQA Guidelines Section 15303(d)]

REMARKS:

See reverse side.

DETERMINATION:

I do hereby certify that the above determination has been made pursuant to State and Local requirements.

BILL WYCKO
Environmental Review Officer

Date

- cc: Michael Edwards, Project Contact
- M.D.F.
- Board of Supervisors
- Distribution List

Bulletin Board
Dan McKenna, Department of Public Works
Historic Distribution List

PROJECT DESCRIPTION (continued):

located within the public right-of-way throughout the City.¹

Each new installation would involve the following work: pairing a Lightspeed cabinet within close proximity to an existing AT&T SAI cabinet (the copper cross-connect box which is already located in the public right-of-way) to make the necessary fiber/copper connections; excavation of up to 48 inches deep would be required for the installation of an approximately 4-foot by 6-foot concrete foundation pad that would support each Lightspeed cabinet; construction of a 3-foot-deep and approximately 10- to 300-foot-long trench run to install conduit from the Lightspeed cabinet to the existing SAI; construction of a 4-foot-deep and approximately 50- to 150-foot-long trench run to connect the new Lightspeed cabinet to an existing power source such as a pole or underground vault; and an additional 3-foot-deep trench may be required if AT&T needs to replace or repair existing underground telephone conduit to accommodate new fiber placement.

In addition, some of the existing SAI cabinets would be enlarged and "re-skinned" with new wiring and room for additional capacity in their existing locations by up to 18 inches in width, 14 inches in diameter, and 16 inches in height, and some would be removed from utility poles, enlarged by up to 7 inches in width, 8 inches in depth, and 39 inches in height, and placed on the ground. The majority of these cabinets would be deployed over a three-year period. Also, in a few locations, SAIs are clustered such that AT&T may be able to further reduce the number of cabinets to less than 726 if appropriate space is available to accommodate a double capacity cabinet. This double capacity cabinet is 50 inches wide by 56.5 inches deep by 48 inches high. A number of existing cabinets would also be enlarged by approximately 6 inches, by adding a bolt to the end panel on the existing cabinet.

AT&T's proposed Lightspeed cabinets would hold the electronics needed to convert the fiber-optic signal to a broadband signal that can be transmitted over its existing copper distribution network. The Lightspeed cabinets would not contain transmitters or wireless devices, and would not emit radio frequency radiation. The Lightspeed cabinets would be equipped with a cooling fan and a back-up battery that would run for up to eight hours during commercial outages. For prolonged outages in residential neighborhoods, generators that are part of AT&T's service vehicles would be used and would run off the power of the vehicle. Diesel generators are also used but are not the preferred method in residential neighborhoods. Another method of providing back up power is to replace the cabinet batteries to extend the power during repair of the power supply. The electronics in these cabinets require that they be placed above ground as a technical matter, as the electronic equipment must be free from moisture and corrosion.

Pursuant to the submitted project proposal, AT&T would locate the proposed new cabinets such that cabinets are located outside of the boundaries of designated historic and conservation districts, and are located within the public right-of-way and not on individual buildings. None of the existing SAI cabinets located within designated historic or conservation districts would be enlarged, "re-skinned," relocated, or

¹ Location maps of the existing SAI cabinets are available for review at the Planning Department, at 1650 Mission Street, Suite 400, as part of Case No. 2010.0944E.

have a bolt added. The only proposed Lightspeed work in these districts is potential trenching to install conduit from the proposed cabinet to the existing cabinet, and if AT&T needs to replace or repair existing underground telephone conduit.

The proposed project is subject to the requirements for excavation permits in Article 2.4 of the Public Works Code and the requirements of Department of Public Works (DPW) Order No. 175,566 concerning placement of surface-mounted facilities (SMF) in the public right-of-way.² DPW reviews each application on an individual basis and evaluates the potential for the proposed facilities to impede travel on public streets, inconvenience property owners, or otherwise disturb the use of the public right-of-way by the public. DPW will ensure that persons affected by the installation have an opportunity to be heard before an impartial hearing officer appointed by the Director of DPW. The hearing officer will summarize the evidence and testimony and will make recommendations to the Director, who will make the final determination. In addition, AT&T will provide notice to all residents within 300 feet of the work 48 hours prior to the commencement of work.

In July 2008, the Planning Department issued a categorical exemption for AT&T's 2007 Lightspeed upgrade proposal (Planning Department Case No. 2007.1350E). The categorical exemption was appealed, and during the appeal hearing before the Board of Supervisors, AT&T withdrew their environmental application.³ To address feedback from the City and the public, AT&T submitted a new project (the current proposal) with the following project changes: (1) reduced the number of new cabinets by 124 (from 850 to 726); (2) integrated the power supply meter into the new cabinets, negating the need for an attached power panel; (3) doubled the needed "pairing" distance from new cabinets to existing cabinets (from 150 feet to 300 feet); and (4) removed all proposed new cabinets that would have been located within the boundaries of designated historic or conservation districts.

REMARKS (continued):

Public Views and Aesthetics

In evaluating whether the Lightspeed cabinets would be exempt from environmental review, the Planning Department determined that they would not result in a significant impact to public views and aesthetics. Visual quality, by nature, is highly subjective and different viewers may have varying opinions as to whether a proposed utility cabinet contributes negatively to the visual landscape of the City and its neighborhoods. The Planning Department's Initial Study Checklist, which is based on Appendix G of the California Environmental Quality Act (CEQA) Guidelines, indicates that assessments of significant impacts on visual resources should consider whether the project would result in: (1) a substantial, demonstrable negative aesthetic effect; (2) a substantial degradation or obstruction of any scenic view or vista now observed from public areas; or (3) generation of obtrusive light or glare substantially impacting other properties. The proposed Lightspeed installations would not result in any of these conditions, as described below.

² Regulations for Issuing Excavation Permits for the Installation of Surface-Mounted Facilities in the Public Right-Of-Way, DPW Order No. 175,566. This document is available for review at the Planning Department, at 1650 Mission Street, Suite 400, as part of Case No. 2010.0944E.

³ AT&T also withdrew all of their pending permit applications (nearly 350) with DPW.

The project sponsor proposes to deploy up to 726 Lightspeed cabinets in a dispersed manner within public right-of-way. The profile of these cabinets would be visible to passersby and observers from nearby buildings, but may not be noticed by the casual observer. The visual impacts of the cabinets would be confined to the immediate areas in which the cabinets are located. Utility-related facilities in the public right-of-way are common throughout the City's urbanized environment (e.g., traffic control cabinets and other utility cabinets). AT&T's cabinet installations would generally be viewed in the context of the existing urban background, and the incremental visual effect of the proposed cabinets would be minimal. In addition, the proposed cabinets would not generate any obtrusive light or glare. The Planning Department reviewed photos of existing cabinets in various locations and the photographs support the Department's conclusion that the cabinets would have a negligible effect on public views and aesthetics.

Pursuant to the submitted project proposal, the proposed cabinets would be located in a manner that would not obstruct pedestrian access, would not intrude on pedestrian "clear zones" at street corners, and would not obstruct the view of any traffic sign, way-finding sign or traffic signal.⁴ AT&T's cabinet placement considerations include setback distances from corners, fire hydrants, transit shelters, kiosks, certified street artist designated areas, and public art work under the jurisdiction of the Arts Commission, except for art on kiosks. If necessary, AT&T would conduct site visits with neighborhood groups to consider location options. Landscaping and screening are also available options for consideration in placing new cabinets. The proposed Lightspeed cabinets would have a graffiti resistant finish and would display a sticker with a toll-free number so that AT&T could proactively remove graffiti. If required for safety, bollards would also be installed.

In reviewing aesthetics under CEQA generally, consideration of the existing context in which a project is proposed is required and evaluation must be based on the impact on the existing environment. That some people may not find the proposed Lightspeed cabinets attractive does not mean that they would create a significant aesthetic environmental impact; they must be judged in the context of the existing conditions. For the proposed Lightspeed project, the context is urban right-of-way that already support similar utility structures dispersed throughout the City. Lightspeed cabinets are thus consistent with the existing, developed environment. The aesthetics of Lightspeed cabinets are similar to other structures in public right-of-way and therefore cannot be deemed an "unusual circumstance." For those same reasons, the "unusual circumstance" exception to the categorical exemptions is not applicable to aesthetic impacts that are similar to existing or potential comparable structures. Lightspeed cabinets would not be unusual and would not create adverse aesthetic impacts on the environment.

For all the above reasons, installation of the proposed equipment cabinets would not result in a significant adverse effect on public views or aesthetics.

⁴ AT&T's Options for Consideration in Placing Lightspeed Cabinets in San Francisco. This document is attached.

Historic Resources

In evaluating whether the proposed project would be exempt from environmental review under CEQA, the Planning Department determined that the proposed project would not result in a significant adverse effect to a historic resource as defined by CEQA. As described in the attached Historic Resource Evaluation Response (HRER) Memorandum, the proposed new cabinets would not result in a significant impact to historic resources.⁵ The analysis and conclusions of the HRER are summarized below.

The proposed 726 new cabinets would be located within public right-of-way, and would not be located on individual buildings. The precise locations of the proposed new cabinets have not been identified. While the new cabinets would be installed within 300 feet of an existing SAI cabinet, none of the proposed new cabinets would be within any designated historic or conservation district.

Based on mapped locations of existing SAI cabinets, the following districts currently contain existing SAI cabinets: Kearney/Market/Mason/Sutter Conservation District, South End Historic District, South of Market Extended Preservation District, Alamo Square Historic District, Buena Vista North Historic District (proposed), Liberty Hill Historic District, and the Dogpatch Historic District. None of the existing SAI cabinets located within these designated historic or conservation districts would be enlarged, "re-skinned," relocated, or have a bolt added as part of the proposed project. The only proposed Lightspeed work in these districts is potential trenching to install conduit from the proposed cabinet to the existing cabinet, and if AT&T needs to replace or repair existing underground telephone conduit.

Although the project sponsor has not precisely identified the locations of the new cabinets, it is possible that a number of new cabinets may be located within documented and undocumented potential historic districts for the purposes of CEQA. It is also possible that a number of the proposed new cabinets would be located in close proximity to buildings and sites that have been individually designated as local, California, or National historic landmarks. It is also possible that a number of the proposed new cabinets would be located in close proximity to structures or sites that either have or have not yet been documented, but that may be individually eligible for the California Register.

Pursuant to the submitted project proposal, AT&T would locate the proposed new cabinets such that: (1) cabinets are located outside of the boundaries of designated historic and conservation districts, (2) cabinets are screened by landscaping (shrubs and trees) where possible, and (3) cabinets are located within the public right-of-way and not on individual buildings.

Based on the size and the locations of the proposed cabinets, the Department has determined that the project would conform with the *Secretary of the Interior's Standards and Guidelines for the Treatment of Historical Properties (Secretary's Standards)* for any cabinet installations proposed within a potential historic district. The proposed project would be consistent with the applicable *Standards and Guidelines for Rehabilitation*, including but not limited to Standards 9 and 10. Cabinets proposed in potential historic

⁵ Historic Resource Evaluation Response Memorandum from Tina Tam, Senior Preservation Planner, to Don Lewis, Planner, Major Environmental Analysis, February 8, 2011. This document is attached.

districts that include character-defining street furniture would be clearly differentiated from historic street furniture, and would not destroy historic materials or spatial relationships that characterize the districts. The proposed new cabinets may be removed in the future without impairing the essential form and integrity of the historic resource. The proposed project calls for the installation of the cabinets in a manner that would allow them to be completely removed without affecting the essential form or integrity of the historic district. The installation of the proposed cabinets would not destroy historic building fabric, and would be reversible. If the equipment is removed in the future, the essential form and integrity of the district and its environment would be unimpaired.

As noted above, the Department has considered the potential of the proposed new cabinets to impair the ability of historical resources, including historic buildings and historic districts, to convey their significance. Based on review of AT&T's submitted project information, the Department has determined that cabinets placed in the public right-of-way within potential historic districts would not impair the district's ability to convey its significance, as the proposed project would be consistent with the applicable *Standards and Guidelines for Rehabilitation*, including but not limited to Standards 9 and 10. It is unlikely that the existence of the proposed cabinets within the public right-of-way would prevent undocumented historic districts or structures from conveying significance.

Pursuant to DPW Order No. 175,566, for any installation(s) on the property of, or adjacent to a designated local, State or National Historic Landmark, in a Local Historic District in Article 10 of the San Francisco Planning Code, in a Conservation Districts designated in Article 11 of the San Francisco Planning Code, in a California Register Historic District, or a National Register Historic District, AT&T will be required to send notice to the Preservation Coordinator of the San Francisco Planning Department and the Historic Preservation Commission.

As noted above, any new cabinet installations that are located within documented and undocumented potential historic districts, would not significantly impact the character-defining features of the district, nor would the proposed new cabinets negatively impact the integrity of the potential historic districts. The Department's determination is that the impact of the proposed cabinets to the setting of existing and potential historic sites, structures, and districts is not significant, and would not impair the ability of historic resources to convey their significance.

For the reasons described above, the proposed project would not result in a significant impact to historic resources.

Exempt Status

CEQA State Guidelines Section 15303, or Class 3, provides for an exemption from environmental review for construction and location of limited numbers of new, small facilities or structures; installation of small new equipment and facilities in small structures; and the conversion of existing small structures from one use to another where only minor modifications are made in the exterior of the structure. The numbers of structures described in Section 15303 are the maximum allowable on any legal parcel. CEQA State Guidelines Section 15303(d) specifically applies to utility extensions. The proposed Lightspeed cabinets are smaller and less noticeable than many of the examples of structures given in Section 15303 as being

categorically exempt, such as single-family homes and multi-family dwellings, and are smaller than many structures where the Planning Department issued this same exemption. Thus, the Lightspeed installations are covered by the range of activities properly exempted pursuant to Class 3.

Exceptions to Exemptions/Exclusions from Environmental Review

CEQA Guidelines Section 15300.2 lists exceptions to the use of categorical exemptions. The exceptions include that an exemption shall not be used where the project would result in a significant cumulative environmental impact (Section 15300.2(b)), where there is a reasonable possibility that the activity would have a significant effect on the environment due to unusual circumstances (Section 15300.2(c)), where the project would damage scenic resources within highway officially designated as a state scenic highway (Section 15300.2(d)), where the project would be located on a site listed as a hazardous waste site pursuant to Section 65962.5 of the California Government Code (Section 15300.2(e)), where the project would cause a substantial adverse change in the significance of a historical resource (Section 15300.2(f)). As described below, there are no conditions associated with the Lightspeed facilities that would suggest the possibility of a significant environmental effect under these exceptions.

No Cumulative Impacts

CEQA State Guidelines Section 15300.2(b) provides that a categorical exemption shall not apply if significant impacts would result over time from successive projects of the same type in the same place. The proposed project involves the installation of up to approximately 726 aboveground cabinets throughout the City. By their minimal nature and widely dispersed locations that do not create significant environmental impacts on historic, archeological, or visual resources, the impacts of the cabinets would not aggregate under CEQA to a degree where the project, by itself, would have cumulative impacts.

There is at least one competing vendor providing a similar service to the proposed project, but that vendor's network has already been established, with the majority of their equipment located outside of the public right-of-way. Since all of these existing and proposed project locations have and would proceed separately at different locations, there would be no foreseeable cumulative impacts due to the proposed project. For the reasons set forth above, this project combined with other ongoing utility and infrastructure work on the public right-of-way would not contribute to cumulative impacts.

Historical Resources

As described above, the Planning Department concluded that the proposed project would not cause a significant impact to a historic resource. Therefore, this issue would not trigger an exception to the use of a categorical exemption.

State Scenic Highways

Categorical exemptions may not be applied to projects that may result in damage to scenic resources within a highway officially designated as a state scenic highway. While there are eligible scenic highways in the City, there are no officially designated state highways. Therefore, the project would not impact an officially designated state highway.

Hazardous Waste

All Lightspeed facilities would be placed in public right-of-way within street and sidewalk areas. These locations are not listed as hazardous waste sites by the state pursuant to Section 65962.5 of the California Government Code.

Unusual Circumstances

The Planning Department did not find any unusual circumstances that would cause the Lightspeed installations to have a significant effect on the environment. These facilities are not unusual compared to similar utilities structures in the public-right-of way, including other structures also subject to the DPW's Surface-Mounted Guidelines. Therefore, this issue would not trigger an exception to the use of a categorical exemption.

Conclusion

Although the proposed project is not without opposition or controversy, opposition and controversy do not themselves constitute significant environmental impacts, nor do they constitute unusual circumstances that would render use of a categorical exemption inappropriate.

As described above, the proposed project would not have a significant effect on historic resources. Also, there are no cumulative impacts or unusual circumstances surrounding the current proposal that would trigger an exception to the application of an exemption. Therefore, the installations would be categorically exempt under Class 3. For all the above reasons, the proposed project is appropriately exempt from environmental review.

Options for Consideration in Placing Lightspeed Cabinets in San Francisco

Element	Recommended	Available Options		
Type of Cabinet	Reduced sized cabinet with power meter included	Standard cabinet with attached power panel	Larger, double capacity cabinet to combine two cabinets at one location	
Location	Public right-of-way up to 300 feet from SAI	Walk through with neighborhood group to consider location options		
Landscaping if appropriate for site	Replace existing landscaping with new	Street trees within 3 to 5 feet of the cabinets if water available	Planting shrubs adjacent to the cabinets, will extend existing irrigation system	Metal trellis with vines that would screen the street side and top of the cabinet
Screening if appropriate for site	Bollards as required for safety	Decorative bollards	Nearby Community signage	
Graffiti	Graffiti resistant finish and sticker with toll-free number	AT&T crews will proactively remove graffiti	Citizens or City can report graffiti via toll-free number or 3-1-1	
Other cabinet placement considerations	<ul style="list-style-type: none"> • Cabinets will not obstruct pedestrian access and a minimum of 4 feet of clearance will be maintained. • Cabinets will not intrude on pedestrian "clear zones" at street corners. • Cabinets will be set back a minimum of 5 feet at corners. • Cabinets will be set back a minimum of 18 inches from the face of the curb. • Cabinets will be set back a minimum of 5 feet from fire hydrants. • Cabinets will be set back a minimum of 40 inches from any other above ground structure. • Cabinets will be set back a minimum of 60 feet from an transit shelter and/or kiosk, unless coordinated with the shelter/kiosk. • Cabinets will be set back a minimum of 5 feet from any certified street artist designated area. • Cabinets will be set back a minimum of 60 feet from any public art work under the jurisdiction of the Arts Commission of San Francisco, except for art on kiosks. • Cabinets will not be placed over any stormdrain or other utility facility. • Cabinets will not obstruct the view of any traffic sign, wayfinding sign or traffic signal. 			



SAN FRANCISCO PLANNING DEPARTMENT

MEMO

Historic Resource Evaluation Response

MEA Planner: Don Lewis
Project Names: AT&T "Lightspeed" Upgrade
Block/Lot: Multiple Locations
Case No.: 2010.0944E
Date of Review: February 8, 2011
Planning Dept. Reviewer: Tina Tam
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PROPOSED PROJECT

Demolition

Alteration

PROJECT DESCRIPTION

The project proposes to install up to 726 new metal communications electronics cabinets, alter a number of existing cabinets, and insert new equipment into existing cabinets with no alterations in order to upgrade the AT&T network in order to provide fiber optic technology to San Francisco neighborhoods. The project, as proposed, includes:

- **New Cabinets:** The proposed new cabinets would be located on the ground, within public right-of-way. The new cabinets measure 51.7" wide by 26" deep by 48" high and are light tan or light green in color. The proposed new cabinets must be placed in close proximity to an existing Service Area Interface (SAI) cabinet in order to make the necessary fiber/copper connection.
- **Existing SAI Cabinets to be Enlarged in their Existing Locations:** A number of the existing SAI cabinets will be enlarged and "re-skinned" in their current locations. The size of the new SAI "shell" would depend on the size of the existing cabinet in each location. The most common sizes for the new shells are 58" wide by 26" deep by 65" high or 58" wide by 18" deep by 65" high. Existing cabinets could increase up to 18" in width, up to 14" in diameter, and up to 16" in height.
- **Existing Cabinets to be Enlarged and Relocated:** A number of the existing SAI cabinets will be removed from utility poles, enlarged, and placed on the sidewalk within public right-of-way. The existing cabinets measure approximately 33" wide by 12" deep, and range from 30" to 57" in high. New, enlarged cabinets would be located on the sidewalk and measure approximately 51.7" wide by 26" deep by 48" high.
- **Existing Cabinets to Remain In-Place with Minor Alterations:** A number of existing cabinets will be enlarged by approximately 6", by adding a bolt to the end panel on the existing cabinet.
- **No Changes to the Existing Cabinets:** A number of the existing SAI cabinets can accommodate the new equipment with no exterior changes.

PRE-EXISTING HISTORIC RATING / SURVEY

AT&T has provided a map that illustrates the location of all existing SAI cabinets (up to 900 in total) within the City and County of San Francisco. The proposed 726 new cabinets will be located in close proximity to the existing SAI cabinets. There are a number of existing SAI cabinets located within designated historic and conservation districts (see below). However, pursuant to AT&T's submitted project proposal, none of the proposed new cabinets would be located within the boundaries of any designated historic or conservation district.

HISTORIC DISTRICT / NEIGHBORHOOD CONTEXT

The proposed new cabinets will be located within public right-of-way, and will not be located on individual buildings. None of the proposed 726 new cabinets would be located within a designated historic or conservation district. The precise locations of the proposed new cabinets have not been identified. While the new cabinets would be installed within 300 feet of an existing SAI cabinet, none of the proposed new cabinets will be within any designated district.

1. **California Register Criteria of Significance:** Note, a building may be an historical resource if it meets any of the California Register criteria listed below. If more information is needed to make such a determination please specify what information is needed. *(This determination for California Register Eligibility is made based on existing data and research provided to the Planning Department by the above named preparer / consultant and other parties. Key pages of report and a photograph of the subject building are attached.)*

Event: or Yes No Unable to determine
Persons: or Yes No Unable to determine
Architecture: or Yes No Unable to determine
Information Potential: Further investigation recommended.
District or Context: Yes, may contribute to a potential district or significant context

If Yes; Period of significance:

Based on mapped locations of existing SAI cabinets, the following districts currently contain existing SAI cabinets. None of the existing SAI cabinets located within these districts would be enlarged, "re-skinned", relocated, or have a bolt added as part of Lightspeed. The only Lightspeed work in these districts is potential trenching.

- Kearney/Market/Mason/Sutter Conservation District
- South End Historic District
- South of Market Extended Preservation District
- Alamo Square Historic District
- Buena Vista North Historic District (proposed)
- Liberty Hill Historic District
- Dogpatch Historic District

Although the project sponsor have not precisely identified the locations of the new cabinets, it is possible that a number of new cabinets may be located within documented and undocumented potential historic districts for the purposes of CEQA. It is also possible that a number of the proposed

new cabinets will be located in close proximity to buildings and sites that have been individually designated as local, California, or National historic landmarks. It is also possible that a number of the proposed new cabinets will be located in close proximity to structures or sites that either have or have not yet been documented, but that may be individually eligible for the California Register.

2. **Integrity** is the ability of a property to convey its significance. To be a resource for the purposes of CEQA, a property must not only be shown to be significant under the California Register criteria, but it also must have integrity. To retain historic integrity a property will always possess several, and usually most, of the aspects. The subject property has retained or lacks integrity from the period of significance noted above:

Location:	<input type="checkbox"/> Retains	<input type="checkbox"/> Lacks	Setting:	<input type="checkbox"/> Retains	<input type="checkbox"/> Lacks
Association:	<input type="checkbox"/> Retains	<input type="checkbox"/> Lacks	Feeling:	<input type="checkbox"/> Retains	<input type="checkbox"/> Lacks
Design:	<input type="checkbox"/> Retains	<input type="checkbox"/> Lacks	Materials:	<input type="checkbox"/> Retains	<input type="checkbox"/> Lacks
Workmanship:	<input type="checkbox"/> Retains	<input type="checkbox"/> Lacks			

Although the project sponsor does not propose to install new cabinets within any designated historic or conservation districts, it is possible that a number of new cabinets may be located within documented and undocumented potential historic districts for the purposes of CEQA.

The Department has considered the potential of the proposed new cabinets to impair the ability of historical resources, including historic buildings and historic districts, to convey their significance. Based on review of AT&T's submitted project information, the Department has determined that cabinets placed in the public right-of-way within potential historic districts will not impair the district's ability to convey its significance, as the proposed project would be consistent with the applicable *Standards and Guidelines for Rehabilitation*, including but not limited to Standards 9 and 10, as discussed in Section 4 below.

Pursuant to the submitted project proposal, AT&T will locate the proposed new cabinets such that:

- Cabinets are located outside of the boundaries of designated historic and conservation districts.
- Cabinets are screened by landscaping (shrubs and trees) where possible.
- Cabinets are located within the public right-of-way and not on individual buildings.

3. Determination of whether the property is an "historical resource" for purposes of CEQA

No Resource Present (Go to 6. below) Historical Resource Present (Continue to 4.)

Although the project sponsor does not propose to install new cabinets within any designated historic or conservation districts, it is possible that a number of new cabinets may be located within documented and undocumented potential historic districts for the purposes of CEQA.

4. If the property appears to be an historical resource, whether the proposed project would materially impair the resource (i.e. alter in an adverse manner those physical characteristics which justify the property's inclusion in any registry to which it belongs).

The project will not cause a substantial adverse change in the significance of the resource such that the significance of the resource would be materially impaired. (Continue to 5 if the project is an alteration.)

The project is a significant impact as proposed. (Continue to 5 if the project is an alteration.)

Based on information submitted by the project sponsor, it appears that AT&T will conform to the Secretary of the Interior's *Standards and Guidelines for the Treatment of Historic Properties*, as applicable, for any cabinet installations proposed within a potential historic district. The Department has determined that the proposed project is consistent with the *Standards*, including but not limited to Standards 9 and 10 of the Secretary of the Interior's *Standards and Guidelines for Rehabilitation*.

Standard 9: New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work will be differentiated from the old and will be compatible with the historic materials, features, size, scale, and proportion, and massing to protect the integrity of the property and its environment.

Cabinets proposed in potential historic districts that include character-defining street furniture will be clearly differentiated from historic street furniture, and will not destroy historic materials or spatial relationships that characterize the districts.

Standard 10: New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

The proposed new cabinets may be removed in the future without impairing the essential form and integrity of the historic resource. The proposed project calls for the installation of the cabinets in a manner that will allow them to be completely removed without affecting the essential form or integrity of the historic district. The installation of the proposed cabinets will not destroy historic building fabric, and will be reversible. If the equipment is removed in the future, the essential form and integrity of the district and its environment would be unimpaired.

5. Character-defining features of the building to be retained or respected in order to avoid a significant adverse effect by the project, presently or cumulatively, as modifications to the project to reduce or avoid impacts. Please recommend conditions of approval that may be desirable to mitigate the project's adverse effects.

As proposed, the project will ensure compliance with the Secretary of the Interior's *Standards and Guidelines for the Treatment of Historic Properties*. The cabinets will not be installed on any individual buildings and where possible, screened by landscaping (shrubs and trees).

