CATEGORICAL EXEMPTION FOR THE CITY OF CULVER CITY MUNICIPAL FIBER NETWORK PROJECT

CULVER CITY, CALIFORNIA

Prepared for:

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SECTION 1.0 – PROJECT DESCRIPTION

1.1 BACKGROUND

Private companies have traditionally been responsible for deploying the infrastructure required to provide Internet access to communities; however, they have not consistently invested in the infrastructure to deliver high-speed broadband via a fiber network. In an effort to satisfy this unserved need, local governments are analyzing the benefit of investing in fiber network infrastructures to facilitate broadband service.

One of the benefits of investing in a broadband infrastructure is economic development stimulus by supplying high-speed Internet access to businesses who have that requirement. This typically includes businesses in the entertainment, video gaming, and social media industries. Communities offering high-speed broadband have been viewed as holding a competitive edge by providing a service that is not typically available in neighboring areas. Businesses that require extensive bandwidths for conducting business are able to capitalize on the community's infrastructure investment.

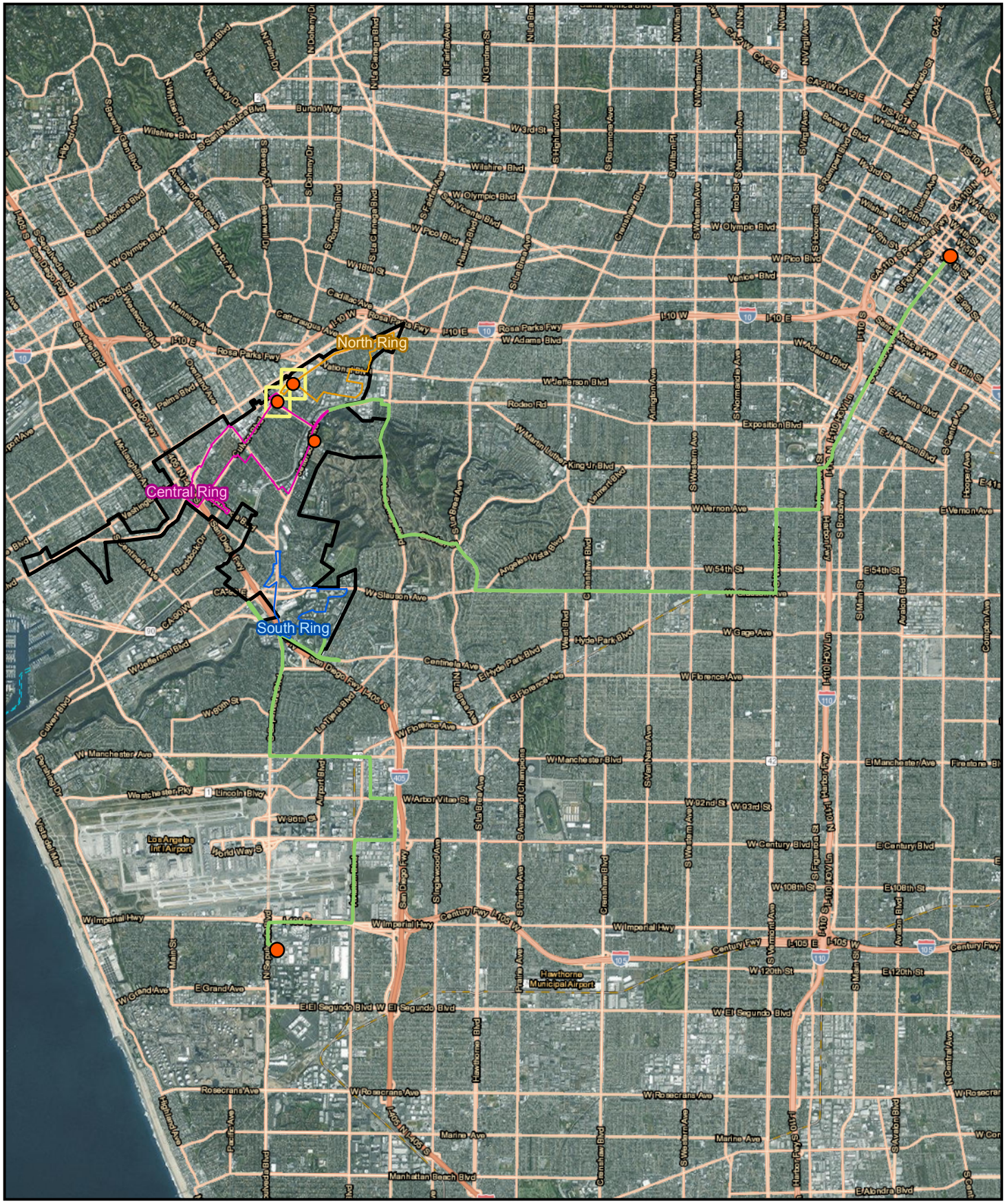
While access to high-speed internet through private companies is available, Culver City businesses have expressed the following challenges and concerns in obtaining high-speed broadband access:

- High cost of entry (paying for the "last mile" fiber connection)
- Service is not easily obtained in desired locations
- High monthly costs for the service
- Excessive timeframe for obtaining the service (exceeding three to four months)

Culver City proposes to install and expand its fiber infrastructure network that will be used to facilitate access to high-speed broadband service to the City itself, the Culver City Unified School District (CCUSD), and local businesses located within the target service areas. Culver City would provide the infrastructure that Internet service providers (ISPs) would potentially use to provide internet service to businesses and CCUSD.

1.2 PROJECT VICINITY

The backbone design includes three network rings that are all interconnected, local interconnection host sites, future laterals, and fiber connections to two data carrier hotel/connector hubs. For ease of reference, these network rings are currently designated as the North Ring, the Central Ring, and the South Ring. The North, Central, and South rings of the city for the proposed fiber network expansion will be located within City right-of-way (ROW) consisting of 17.6 route miles and will not be located on private property. In addition to the North, Central, and South rings, the network infrastructure will include 3.1 route miles of fiber for the "ring ties" which are used to interconnect the three rings, totaling 20.7 miles of fiber for the proposed network infrastructure. The rings are shown on Figure 1: Network Overview.



Legend

- City Limits
- Potential Hub Site
- North Ring
- Central Ring
- South Ring
- Data Center Connections
- Potential Hub Sites

N

0 0.5 1 2
Miles

Figure 1
Culver City
Fiber Network

Name: 20879 Fig 1 Project Location.Mxd
Print Date: 9/22/2015, Author: msimmons

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The route detail of the fiber network backbone design is as follows:

North Ring:

- Culver Boulevard and Lafayette Place to Washington Boulevard and La Cienega Boulevard
- Washington Boulevard and La Cienega Boulevard to Hines Avenue to Adams Boulevard to Fairfax Avenue to Perry Drive to La Cienega Boulevard to Smiley Drive to Blackwelder Street
- Blackwelder Street to existing Ballona Creek crossing utility bridge
- Jacobs Street and Sentney Avenue to Reid Avenue
- Syd Kronenthal Park to National Boulevard
- National Boulevard to Hayden Avenue to Steller Drive to Eastham Drive to Higuera Street
- Higuera Street to Lucerne Avenue to Ince Boulevard to Culver Studios
- Van Buren Place to Irving Place to Culver Boulevard
- Lucerne Avenue/Ince Boulevard to Duquesne Avenue

Central Ring

- Duquesne Avenue/City Hall to Ballona Creek
- Ballona Creek East Side Duquesne Avenue to Van Buren Place
- Jefferson Boulevard/Van Buren Place to Leash Lane
- Leash Lane to Nant Studios
- Jefferson Boulevard/Nant Studios to Jordan Way
- Jordan Way to Virginia Avenue to Overland Avenue to Ocean Drive to Elenda Street/Ballona Creek Pedestrian Bridge
- HS/Pedestrian Bridge to Overland Avenue
- Overland Avenue to Culver Boulevard
- Culver Boulevard/Overland Avenue to Sepulveda Boulevard
- Sepulveda Boulevard/Culver Boulevard to Franklin Avenue/to Sepulveda Boulevard.
- Culver Boulevard and Sepulveda Boulevard to Sawtelle Boulevard to Washington Boulevard to Globe Avenue
- Washington Boulevard/Globe Avenue to Overland Avenue

- Washington Boulevard and Overland Avenue to Culver Boulevard to Lincoln Avenue
- Culver Boulevard and Lincoln Avenue to Duquesne Avenue to Washington Boulevard to Lafayette Place

South Ring

- Jefferson Boulevard/Jordan Way to Hannum Avenue
- Virginia Avenue and Overland Avenue to Pickford Way to Kinston Avenue to Jefferson Boulevard to Machado Road to Sepulveda Boulevard to Janisann Avenue to Orville Street to Sawtelle Boulevard to Hayter Avenue to Berryman Avenue to Segrell Way
- Playa Street and Hannum Avenue to Bristol Parkway
- Bristol Parkway and Slauson Avenue to Buckingham Parkway
- Slauson Avenue to Buckingham Parkway
- Buckingham Parkway
- Buckingham Parkway to Wooster Avenue/Slauson Avenue
- Slauson Avenue and Wooster Avenue to Buckingham Parkway to Hannum Avenue to Uplander Way to Bristol Parkway to Green Valley Circle to Doverwood Drive to Bristol Parkway to Centinela Avenue
- Sepulveda Boulevard and Centinela Avenue to Jefferson Boulevard/Playa Street
- Jefferson Boulevard/Sepulveda Boulevard to Slauson Avenue to Segrell Way to Berryman Avenue
- Sawtelle Boulevard/Sepulveda Boulevard to Hannum Avenue
- Sawtelle Boulevard to Playa Street

1.3 PROPOSED PROJECT

The project is the proposed Municipal Fiber Network (Network) which will provide the infrastructure needed to deliver high-speed broadband Internet to CCUSD and businesses in the area. The City is not the service provider but would license the city-owned fiber infrastructure to ISPs to facilitate delivering high-speed broadband access. The City proposes the design, construction, and expansion of the City's existing fiber network with the addition and replacement of an approximately 21-mile-long municipal fiber Network system consisting of the North, Central, and South rings of Culver City.

The complete Network design requires four essential components:

- A redundant fiber backbone

- Fiber laterals on both public and private property to provide fiber-optic cable to the City of Culver City for its own use and to the Culver City Unified School District (CCUSD) and businesses located within the target service area

- Local (within the city) interconnection host sites (network nodes) at three different locations, located on both public and private property

- Fiber connection within the city and beyond the city's boundaries to two different data carrier hotel/communications hubs located in the City of Los Angeles and the City of El Segundo, respectively

The Network will consist of a backbone network, as described above, in addition to laterals which would connect the backbone fiber of the Network to the City of Culver City for its own use, the CCUSD, and businesses located within the target service areas. The backbone of the Network has been designed in such a way that appropriately spaced hand holes (connection points) will optimize the lateral design. The lateral construction will be identified and addressed based on business demand and qualifications and location.

Operating the Network requires local interconnection sites (network nodes) within the city. The Network design has identified three sites that will be used to host the electronics and network devices that enable the Network to operate. Additionally, ISPs that ultimately begin servicing the city would also need to install networking devices at one or more of these identified locations. The following network nodes have been identified:

- Either :
    - Culver City City Hall – 9770 Culver Boulevard, Culver City, California (CA) 90232

      OR

    - Fire Station Number 3 – 6030 Bristol Parkway, Culver City, CA 90230
- NantWorks/Mox Networks – 9920 Jefferson Boulevard, Culver City, CA 90230
- Culver Studios – 9336 West Washington Boulevard, Culver City, CA 90232

Lastly, the City would need to connect its fiber Network to a carrier hotel. A carrier hotel is simply a very large data center and is used as the connection point or communication hub because ISPs share facilities at carrier hotels. The Network design recommends connecting to two communication hubs: One Wilshire, located in the City of Los Angeles, and Equinix/El Segundo, located in the City of El Segundo. Establishing this connection will enable the City of Culver City, CCUSD, and participating businesses located in target service areas to utilize the Network and be able to obtain Internet service from a variety of ISPs. The infrastructure to connect to these sites would extend beyond the city's boundaries. The infrastructure used to accomplish this service is referred to as the "long haul," and the City would not own this infrastructure. It is recommended that the City would license or lease the required infrastructure (dark fiber) for the long haul, and this would be one of the ongoing costs of operating the Network.

Network design characteristics are presented by ring in Table 1:

Table 1: Segment Design Characteristics

	North Ring	Central Ring	South Ring	Ring Ties
Total Route Miles	4.67	8.97	4.96	3.10
Route Miles (Existing Conduit)	1.39	3.44	1.24	1.22
Route Miles (New Conduit)	3.28	5.53	3.73	1.87
New Hand Holes	45	91	44	28
Existing Hand Holes	37	60	21	22
Note: Approximate Total Route miles = 21.69 miles				

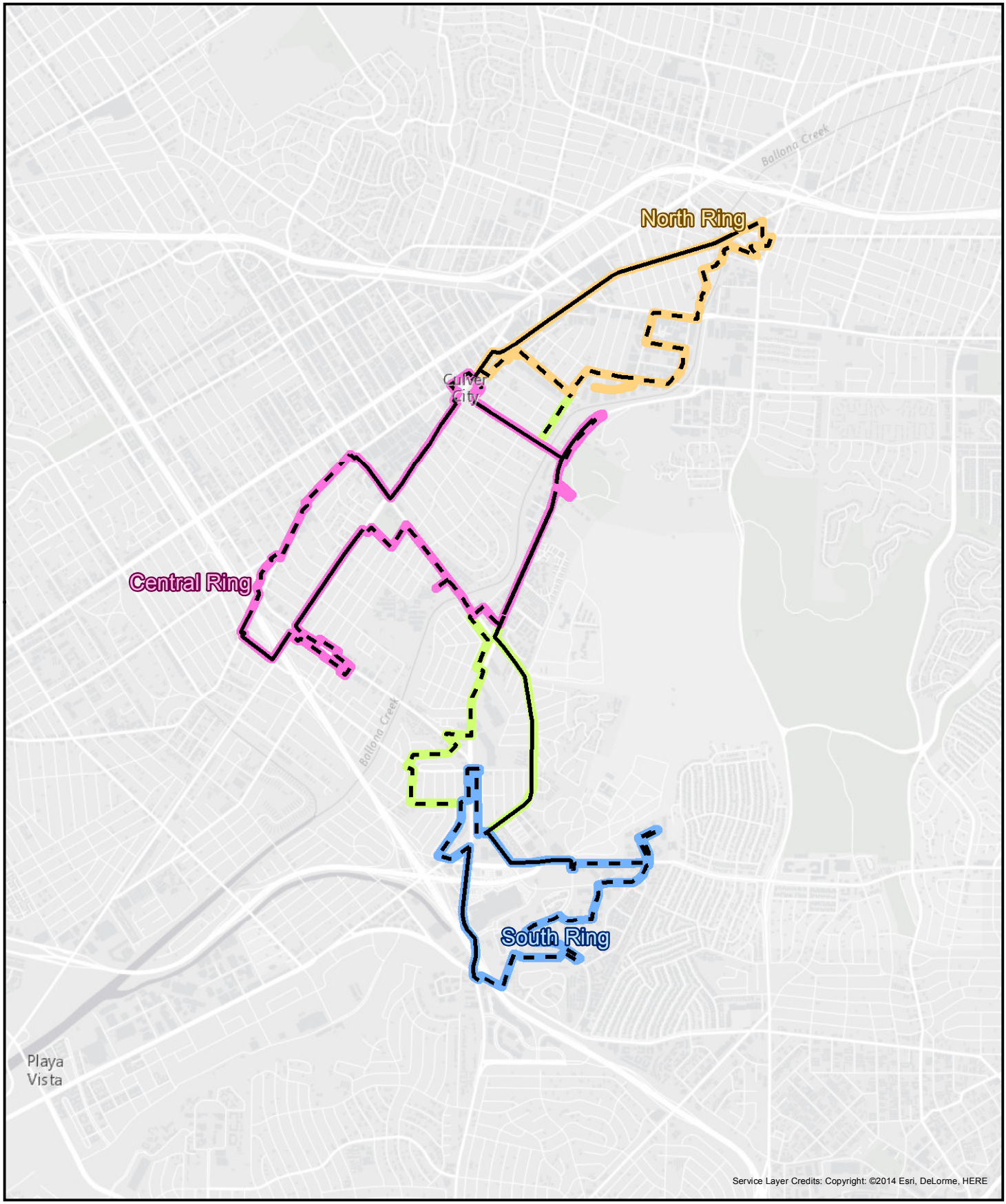
Additionally, Figure 2 shows the fiber Network route, delineating those areas utilizing existing conduit from those requiring new conduit.

1.3.1 Construction Methods

Development and construction of the Network backbone, including the North, Central, and South rings, will take place in areas that are previously disturbed where existing utility lines currently exist. . Expansion of the existing network will be conducted on 34 percent of the total route miles of fiber lines, including a bridge attachment where the infrastructure crosses Ballona Creek; , and the remaining 66 percent of the project construction will consist of the installation of new lines.

The proposed build types for the municipal fiber Network are as follows:

- Interior Conduit: Any location that requires coming from the outside plant to the inside plant (transitioning from outside infrastructure to interior infrastructure). This would require electric metallic tubing (EMT) or galvanized steel pipe.
- Building Penetration: Connection of the Network to existing buildings and the infrastructure located therein
- New Underground (UG) Plant: Requires directional boring for new conduit between hand hole locations with fiber slack and splicing as required
- Existing Conduit: Utilizing existing City streetlight conduit system with existing fiber in it. Requires new hand holes to accommodate new fiber cables, slack, or splicing
- Bridge Attach: 3- or 4-inch galvanized steel pipe that traverses the span of the bridge



Legend

- North Ring
- Central Ring
- South Ring
- Ring Ties

Underground Fiber Network

- Existing Underground
- Proposed Underground

N

0 0.25 0.5 1

Miles

Figure 2

Culver City
Fiber Underground Network

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Print Date: 10/19/2015, Author: msimmons

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Construction methods would be similar to those used in the city's typical underground utility installation and/or maintenance. Construction efforts will include minor trenching and directional boring within existing lines and trenches and along bridges. Standard equipment will be used such as back hoes, dump trucks, vacuum trucks, and horizontal directional drilling equipment. The City will replace existing hand holes concurrently with selected existing fiber-optic cables. Conduit sizes will be 1.25 inches to the building with 30 to 36 inches depth, depending on location-specific factors. Standard sizes for the new hand holes to accommodate slack are 30 inches in width, 48 inches in length, and 24 inches in diameter. Splice enclosure sizes are 30 inches in width, 48 inches in length, and 36 inches in depth. Trenches to support this conduit , where required, would be approximately 6 to 18 inches wide.

Because the location of all laterals is not known at this time, the City has developed the following environmental parameters and siting and construction parameters for future laterals:

- To the greatest extent feasible, laterals will be located in areas previously developed or disturbed.
- Laterals will not be located in sensitive habitat or areas of known cultural resources, including historic resources.
- Requests for connection to a building designated as historic will be made only if the connection does not impact the historic integrity of the site.
- As with the Network construction described herein, construction of future laterals will be consistent with allowed hours of construction and required best management practices for dust and stormwater controls.
- Laterals will not be located in waters of the United States or waters of the State.
- Laterals will be sited to minimize ground disturbance.

1.3.2 Construction Schedule

Because of the linear nature of the Network, construction will occur along different portions of the Network route. The estimates below on linear miles of construction completed per day assume that construction is not materially impacted by forces outside the contractor's control:

- Existing infrastructure that requires no additional preparation – 1,500 to 2,000 feet per day
- New construction utilizing directional bore – 600 feet per day per drill/crew
- New construction utilizing trenching at major roadways (i.e., major road crossing, commuter tracks) – five days to three weeks per instance

Once a portion of the Network has been installed and the surrounding area restored, construction will move to another portion of the designated route. As such, although construction of the Network is expected to occur over an approximately six- to eight-month period, construction in a localized area would occur over a much shorter duration. Construction will be performed in accordance with the City's applicable regulations and requirements and will generally occur between 9:00 a.m. and 3:00 p.m. No construction will occur in residential areas after 8:00 p.m.

Construction of the proposed Network will be planned in high-traffic areas during times of the day with reduced traffic congestion. For large intersections, construction will be performed on weekends so as not to disrupt city businesses and residences. The above factors will be based on traffic patterns identified by the City. A detailed traffic control plan will be prepared by the City and submitted to the contractor prior to beginning construction. Traffic control measures would include:

- Adjust hours to non-peak hours
- Traffic control and detour signage, posting notice of planned work, door hangers, and letters to residents and businesses
- Maintain clear pedestrian and driveway access
- Material and equipment parking restrictions

1.3.3 Operation and Maintenance

Once the fiber-optic cable Network is in operation, a storage facility, approximately 40 to 50 square feet in size, will be constructed to store spare fiber, conduit, and additional equipment needed for maintenance. The storage facility will be located in an indoor location, accessible by forklift. No site preparation or ground disturbance will be required. Periodic maintenance will be required throughout the life of the Network.

A temporary interruption of service to the City's existing network infrastructure may occur while the Network is being expanded. The potential for interruption will be reduced through use of duct proofing, installation of tracer wire, and fiber audits.

SECTION 2.0 – REASONS TO SUPPORT EXEMPTIONS FINDINGS

For the reasons described in detail below, the fiber-optic Network infrastructure expansion proposed by the City of Culver City is categorically exempt from the California Environmental Quality Act (CEQA) pursuant to the following sections of the Guidelines for the Implementation of CEQA:

- Categorical Exemption Class 4 – Section 15304: Minor Alternations to Land
- Categorical Exemption Class 1 – Section 15301: Existing Facilities
- Categorical Exemption Class 2 – Section 15302: Replacement or Reconstruction
- Categorical Exemption Class 3 – Section 15303: New Construction or Conversion of Small Structures

Further, there is no substantial evidence that the project is subject to an exception to the categorical exemptions. The exceptions to the categorical exemptions, pursuant to Section 15300.2 of the CEQA Guidelines, are:

(a) Location. Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located. A project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply in all instances except where the project may impact an environmental resource of hazardous or critical concern where it is designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.

(b) Cumulative Impact. All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place and over time is significant.

(c) Significant Effect. A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.

(d) Scenic Highways. A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources or within a highway officially designated as a state scenic highway. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified Environmental Impact Report (EIR).

(e) Hazardous Waste Sites. A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.

(f) Historical Resources. A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.

2.1 CATEGORICAL EXEMPTION CLASS 4 – SECTION 15304: MINOR ALTERNATIONS TO LAND

Section 15304 states “Class 4 consists of minor public or private alterations in the condition of land, water, and/or vegetation which do not involve removal of healthy, mature, scenic trees except for

forestry or agricultural purposes. Examples include, but are not limited to…(f) minor trenching and backfilling where the surface is restored."

As described above, construction of the Network will occur within existing trenches and/or previously disturbed areas where existing utility lines and buildings are located and along one bridge within the city's private, public and ROW areas. A majority of the disturbance will occur within existing city sidewalks, requiring only minor trenching and backfilling. When trenching is required, trenches will be limited to no greater than 18 inches wide and may be as small as 6 inches wide. For portions of the Network where additional ground disturbance is required, construction will be limited to minor trenching or backfilling. As with trenching within city sidewalks, trenching located on surfaces not previously disturbed would also be limited to 18 inches wide. All surface disturbance will be restored to existing conditions. Further, construction will not involve the removal of healthy, mature, or scenic trees.

2.2 CATEGORICAL EXEMPTION CLASS 1 – SECTION 15301: EXISTING FACILITIES

Section 15301 states "Class 1 consists of the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of use beyond that existing at the time of the lead agency's determination." The types of "existing facilities" itemized within the guidelines are not intended to be all inclusive of the types of projects which might fall within Class 1. The key consideration is whether the project involves negligible or no expansion of an existing use.

The proposed Network includes installation of a portion of the fiber network within existing infrastructure, including trenches and conduits used for existing utilities. The proposed Network includes a portion of the fiber-optic cable to be replaced and installed within previously disturbed areas along private, public, and city ROW property which are currently occupied with existing utilities, including fiber network lines. The placement of the Network within the existing trenches and conduits represents collocation of features and does not expand the physical footprint.

Fiber optic cables are able to send larger data at a faster rate compared to copper wiring. Fiber optic cables are able to protect signals from electromagnetic interference, are non-flammable, and able to retain higher signal strength over longer distances. The addition of the fiber optic cable lines will provide a wider radius of access to faster internet speeds by businesses within Culver City, however, in areas where the existing network is being replaced, the infrastructure required to do so (trenching, conduits, etc.) will not require expansion.

2.3 CATEGORICAL EXEMPTION CLASS 2 – SECTION 15302: REPLACEMENT OR RECONSTRUCTION

Section 15302 states "Class 2 consists of replacement or reconstruction of existing structures and facilities where the new structure will be located on the same site as the structure replaced and will have substantially the same purpose and capacity as the structure replaced…".

The Network includes updating, replacing, and expanding existing City-owned fiber infrastructure. Replacement of existing fiber-optic cable and additions to the fiber network will be inserted within existing City ROW using existing trenches, bridges, and conduits. The fiber Network will be connected to three network nodes located within the city. Even in locations where new infrastructure is being installed for the Network backbone, installation will be performed within existing trenching and/or

previous disturbed areas. The footprint of these areas will not expand due to Network installation; and, therefore, the Network represents the maintenance of the capacity and purpose of the infrastructure it is replacing.

2.4 CATEGORICAL EXEMPTION CLASS 3 – SECTION 15303: NEW CONSTRUCTION OR CONVERSION OF SMALL STRUCTURES

Section 15303 states "Class 3 consists of 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 this section are the maximum allowable on any legal parcel."

The proposed Network consists of rings and lateral connections from the municipal network to the City of Culver City, CCUSD, and businesses located within the target service areas and will not require any sizeable construction of new facilities. These small structures would be buried underground, and any site disturbance would be restored to its existing condition. Any additional connections or new connections will require minimal disturbance within the buildings and sidewalk and private property as needed to connect future laterals. The municipal fiber-optic cable Network will be provided to businesses located within the target service areas and private ISPs. The environmental parameters and construction and siting criteria discussed in Section 1.3.1 will be followed by the City when locating and constructing laterals and small structures.

2.5 EXCEPTIONS – SECTION 15300.2

2.5.1 (a) Location

Section 15300.2(a) states "Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located — a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies."

The proposed Network has been designed to utilize existing infrastructure to the maximum extent feasible, and disturbed surfaces will be restored to existing conditions upon completion of Network construction. The vast majority of the proposed Network will be constructed in an urban or suburban environment in areas that are currently paved or otherwise developed. The Network backbone design avoids all designated trails, sensitive biological resources or known cultural resources that occur within the immediate vicinity. Therefore, the Network would not pose a significant impact to any known resources. Environmental parameters and construction and siting criteria provided in Section 1.3.1 will be followed when locating and constructing laterals whose locations are not known at this time. Therefore, no environmentally sensitive resources would be affected by the proposed Network.

2.5.2 (b) Cumulative Impact

Section 15300.2(b) states "All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant."

The proposed Network reduces cumulative impacts by collocating with existing fiber network facilities and other utilities and by utilizing existing infrastructure. Further, impacts to the environment from construction of the proposed Network are inherently temporary as features will be constructed either underground or attached to existing structures; and all disturbed surfaces would be restored to existing conditions. Therefore, potential cumulative impacts would occur only if projects are being constructed in the same area and at the same time as the proposed Network construction. If projects are scheduled to be constructed concurrently within the vicinity of Network construction, the City will coordinate activities to avoid redundancies in equipment, labor, and traffic control measures. This coordination will serve to reduce effects of concurrent projects by eliminating unnecessary interruptions in street and sidewalk traffic. Therefore, the proposed Network will not significantly contribute to cumulative impacts.

2.5.3 (c) Significant Effect

Section 15300.2(c) states "A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances."

Proposed construction efforts for the Network will include minor trenching and directional boring within existing lines, trenches, and bridges, which are expected to be minimal in impact. The type of construction activities associated with the proposed Network is identical to standard utility work performed by the City. These routine activities include sewer repair, utility undergrounding, and construction of wiring associated with street lights, to name a few. No environmentally sensitive resources would be affected by the proposed Network. Unusual circumstances have been defined as a project that would include an extensive road scar near a scenic highway and steep hillside grading that would result in a risk of erosion; that the location of the septic tank leach lines would create a danger of sewage seepage into a creek and a drinking water well; that would result in a significant fire danger because of the project's location on a thickly forested slope; and that would require several scenic oaks to be removed, as found in *Myers v. Board of Supervisors*, supra, 58 Cal.App.3d at p. 426, 129 Cal.Rptr. 902. None of these have been identified in the construction for the proposed project.

2.5.4 (d) Scenic Highways

Section 15300.2(d) states "A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR."

The proposed Network components are not located near or within visibility of a designated scenic highway.

2.5.5 (e) Hazardous Waste Sites

Section 15300.2(e) states "A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code."

One hazardous waste site in the vicinity of the proposed Network route was identified through a review of the Envirostor database for Hazardous Waste and Substances Site

(http://www.envirostor.dtsc.ca.gov/public/). The former Apex Metal Polishing business is located at 5977 West Washington Boulevard. The proposed Network route is not located underneath or on the former Apex Metal Polishing site; rather, the Network route parallels the facility and no construction is expected to take place within the facility. Therefore, the proposed Network will not be located on a site which is included on any list compiled pursuant to Section 65962.5.

2.5.6 (f) Historical Resources

Section 15300.2(f) states "A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource."

In 1990, the Culver City Historic Preservation Advisory Committee Report was published that indicated properties within the city designated as a "landmark," "significant," or "recognized." Several structures have been listed in the National Register of Historic Places. Some lateral connections could be made to historic buildings; in fact, Culver Studios will serve as a network node. Connections to these facilities will be underground, and any underground disturbance will be temporary in nature. Environmental parameters will be in effect during construction to ensure that no substantial adverse change to historical resources is made. Therefore, the Network will not cause a substantial adverse change in the significance of a historical resource.

While the city houses structures of historic and cultural importance, the proposed Network will not significantly impact any of the city's historical resources because the only alterations to be performed as part of the Network construction are temporary in nature, and disturbed surfaces will be restored upon completion. Further, the installation of infrastructure within or adjacent to buildings will be designed to avoid any substantial adverse changes. Culver Studios, designated as a historical landmark, houses a previously used data center. Installation of the proposed Network will not require additional construction to prepare the space. Figure 3 and Figure 4 show the location of the existing data center within Culver Studios. Network development is almost entirely underground (with the exception of one bridge attachment), and disturbed surfaces will be restored to existing conditions once construction has been completed.

Figure 3
Culver Studios – Building P

Not to scale.

Name: 20879 Fig 3 Building P.Mxd
Print Date: 10/20/2015, Author: msimmons

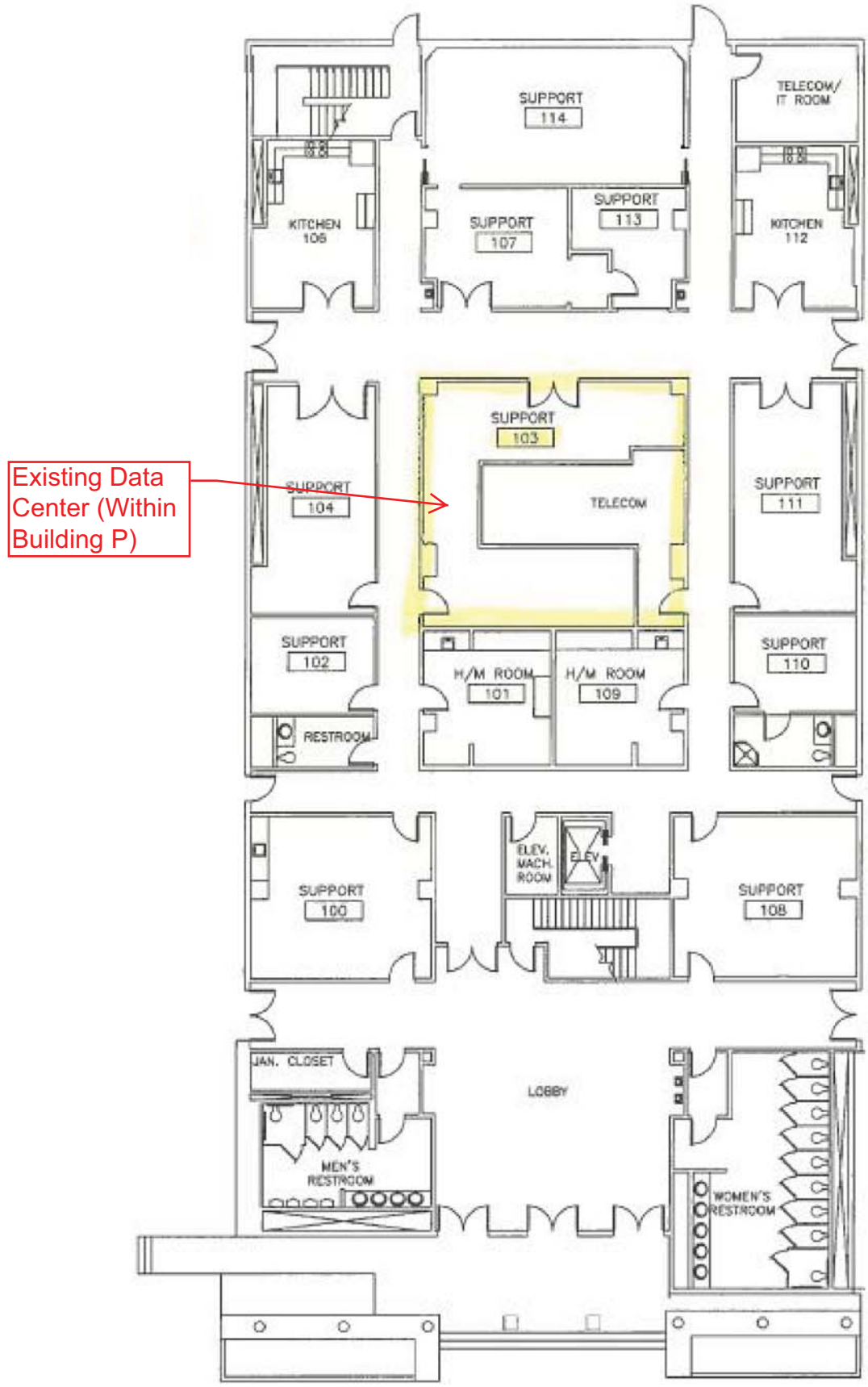

Figure 4
Culver City
Building P 1st Floor

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