

Subject: Wireless Telecommunications Facilities within the Public Right-Of-Way	Number: TR 1.3.1
	Date: October 20, 2016 Issue/Revised:
Responsible Department: Public Works Department	Approved:

Purpose: This document sets forth the policies and procedures required to promote quality, clarity and consistency in applying the requirements and guidelines for the acceptance, processing and approval of new and modifications to existing wireless telecommunications facilities within the public right-of-way.

The Wireless Telecommunications Facilities within the Public Right-of-Way Policy (“**Wireless ROW Policy**”) applies to **all new** Wireless Telecommunications Facilities and **all modifications** to existing facilities proposed within the public right-of-way.

Policy: This policy is enacted pursuant to Fresno Municipal Code Section 15-2759 subject to federal limitations pursuant to 47 U.S.C. Section 332(c)(7). It is intended that such facilities be located, installed and operated in a manner consistent with all of the articulated health, safety, and aesthetic objectives of this policy, while recognizing the benefit of these facilities to the community. This policy applies to all Wireless Telecommunications Facilities located within the public right-of-way.

A. SITE PREFERENCES AND CRITERIA

1. Applicants seeking to install wireless telecommunications facilities within the public rights-of-way shall propose to collocate with other existing wireless telecommunications facilities within the public rights-of-way whenever feasible.
2. In the event that an applicant demonstrates that collocation with other existing wireless telecommunications facilities is not feasible, applicants shall propose to install wireless telecommunications facilities on existing poles and other potential support structures in the public rights-of-way whenever feasible. The City strongly discourages new poles and other encroachments into the public rights-of-way for wireless telecommunications facilities and will consider such requests as a last resort when the applicant has demonstrated that installations on existing support structures in the vicinity is not technically feasible or that such structures are not potentially available to them.
3. The centerline of any new pole must be aligned with the centerlines of existing poles on the same sidewalk segment. After the Public Works Department approves a proposed new pole location, but before the

permittee commences construction, the permittee must verify the correct pole alignment in the field.

4. Any new pole and/or equipment and other improvements associated with a new pole or an existing pole must be setback from intersections, alleyways and driveways and placed in locations where it will not obstruct motorists' sightlines or pedestrian access. Any new pole and/or equipment and other improvements associated with a new pole or existing pole must not reduce the passable clearance of any sidewalk to less than five feet.
5. Any new pole and/or equipment associated with a new wireless facility in the right-of-way shall not be located in front of a single-family or multi-family home unless in front of an existing block wall on a major street.
6. The City, in its proprietary capacity, retains sole and absolute discretion over whether and on what terms it may allow wireless facilities on its poles and other structures in the public right-of-way. Applicants may not submit any applications in connection with City-owned poles or other structures without a valid and fully executed agreement to use the specific pole or other structure. The City shall not authorize any attachments to City-owned infrastructure that negatively impacts the structural integrity of the support structure.
7. In the event that the City determines that an approved siting location is needed for public purposes, which include without limitation any street widening, street realignment or sidewalk improvements, the permittee shall relocate the wireless telecommunications facility at its sole cost and expense within a reasonable time after notice from the City.

B. DESIGN PREFERENCES AND CRITERIA

1. All new poles shall be metal. The Director of the Public Works Department^a (Director), or his or her designee, shall not approve any new wood poles as support structures for wireless telecommunications facilities in the public rights-of-way.
2. The Director shall not approve any new pole or installation on any existing pole that exceeds 45 feet in overall height above finished grade, unless the Director determines that the project qualifies for an exception to the overall height limitation. The Director may grant an exception when:
 - a. No other technically feasible or potentially available locations or designs, including without limitation the use of multiple lower

^a Among others, the Director may choose to designate, as his or her designee, the Director of the Development and Resource Management Department ("DARM"), any assistant director or any planning manager within DARM. Any reference to the Director under this Wireless ROW Policy includes the Director's designee.

facilities rather than a single taller facility, would allow the applicant to achieve its technical objective; or

- b. The proposed new pole or installation on an existing pole would not exceed the height of any similar existing pole within a 300-foot radius from the proposed location.
3. Any new pole or replacement pole shall not exceed 24 inches in diameter from base to top; provided, however, that the radome installed to conceal the antenna and any associated equipment may be up to 36 inches in diameter.
4. The antenna(s) associated with the first installation must be top-mounted and concealed within a radome that also conceals the cable connections, antenna mount and other hardware. The Director may approve a side-mounted antenna with the initial installation if, in the Director's discretion, the side-mounted antenna would be more appropriate given the built environment, neighborhood character, overall site appearance and would promote the purposes in this Wireless ROW Policy. Antennas for fixed site-to-fixed site communications (including but not limited to microwave backhaul) shall also be concealed in a radome or other similar enclosure. GPS antennas must be placed within the radome or directly above the radome not to exceed six inches.
5. All non-antenna equipment must be placed underground to the extent feasible. In the event that the applicant demonstrates that undergrounding is not technically feasible, then the applicant shall install all non-antenna equipment within a shroud or cabinet to be placed either on the ground or on the pole. To the extent undergrounding is not feasible, the City prefers all non-antenna equipment to be installed in a single ground mounted cabinet that incorporates appropriate concealment elements described below. The Director shall require the applicant to incorporate concealment elements into the proposed design. Concealment may include, but shall not be limited to, public art displayed on the cabinet, strategic placement in less obtrusive locations and placement within existing or replacement street furniture. Any pole-mounted equipment must be mounted as flush to the pole as possible and contained within the radome. The Director may also require the applicant to incorporate ambient noise suppression measures and/or require the applicant to place the equipment in locations less likely to impact adjacent residences or businesses to ensure compliance with all applicable noise regulations.
6. Utility service lines must be undergrounded whenever feasible to avoid additional overhead lines. For non-wood poles, undergrounded cables and wires must transition directly into the pole base without any external doghouse.

7. Multiple operators on a shared pole should share a single electric meter. Site operators should use the smallest and least intrusive electric meter available. In the event that a smaller or less intrusive meter becomes available after the site operator installs its equipment, the site operator must remove the current meter and install the new one within a reasonable time. The Director strongly encourages site operators to use flat-rate electric service when it would eliminate the need for a meter. Whenever permitted by the electric service provider, the electric meter should be painted to match the pole.
8. Cabinets for telephone and/or fiber optic utilities may not extend more than six inches beyond the pole width on either side, and must be painted, wrapped or otherwise colored to match the pole.
9. To reduce clutter and deter vandalism, excess fiber optic or coaxial cables shall not be spooled, coiled or otherwise stored on the pole whether in a cabinet or not.
10. On all new poles and all installations on existing metal poles, all above-ground conduits shall be routed directly through the interior of the pole. On all installations on existing wood poles, all above-ground wires, cables and connections shall be encased in the smallest-diameter PVC conduit or shroud feasible, and painted to match the pole.
11. Unless otherwise required for compliance with FAA or FCC regulations, the facility shall not include any permanently installed lights. Any lights associated with the electronic equipment shall be appropriately shielded from public view. The provisions in this subsection shall not be interpreted to prohibit installations on streetlights or the installation of luminaires on new poles when required by the Director.
12. All above-ground or pole-mounted equipment in the rights-of-way must be finished with non-reflective materials unless approved by the Director.

C. MINOR TECHNICAL EXCEPTIONS TO DESIGN PREFERENCES AND CRITERIA

1. The City recognizes that in some circumstances strict compliance with the Design Preferences and Criteria may result in undesirable aesthetic outcomes, and that minor deviations should be granted when the need for such deviation arises from circumstances outside the applicant's control. To provide reasonable flexibility in the administration and implementation of this Policy, this section describes the required findings for a minor technical exception from the Design Preferences and Criteria for wireless telecommunications facilities in the public rights-of-way.

2. The Director may, in its sole discretion, grant a minor technical exception from strict compliance with the Design Preferences and Criteria for wireless telecommunications facilities in the public rights-of-way when the Director finds that:
 - a. the applicant has requested an exception in writing;
 - b. the need for the exception arises from an external factor outside the applicant's control that impact public health, safety or welfare, including without limitation soil compaction, existing congestion or clutter within the rights-of-way or other location-specific phenomenon;
 - c. the proposed deviation from the applicable requirement is less than 10% larger than the generally applicable standard; and
 - d. The granting of a minor technical exception would not create any obvious hazard or unreasonable obstruction in the public right-of-way.

D. PROCEDURAL GUIDELINES

1. Applicants proposing to install and operate a new wireless telecommunications facility in the public right-of-way within the City of Fresno will be subject to this Wireless ROW Policy and must obtain a Street Work Permit issued through the City of Fresno Public Works Department and a Conditional Use Permit issued through the City of Fresno Development and Resource Management Department.
2. Applicants with an approved Conditional Use Permit proposing to add an additional carrier to a wireless telecommunications facility in the City of Fresno will be subject to these guidelines and required to amend the Conditional Use Permit by submitting an Amended Permit application to the City of Fresno Development and Resource Management, for processing.
3. Modifications to an existing wireless telecommunications facility related to replacement of equipment, antennas, cabinets, which do not materially change the operations of the facility may be accomplished through amending the Conditional Use Permit by submitting a Revised Exhibit (minor) application to the City of Fresno Development and Resource Management, for processing.

4. Modifications to an existing wireless telecommunications facility within the right-of-way will be subject to the policies contained in this Wireless ROW Policy unless determined by the Director to be inappropriate.
5. In addition to any Conditional Use Permit, amended permit or revised exhibit required under this Wireless ROW Policy, any applicant proposing to install, operate, collocate or modify a wireless telecommunications facility in the public rights-of-way shall obtain a Street Work permit from the Public Works Department.
6. Submittal of a Conditional Use Permit or Street Work Permit application may cause a review of permit activity for the subject property to ensure compliance with the Fresno Municipal Code (FMC) and this Wireless ROW Policy. An identified code or policy violation may require the property owner or permit holder to make necessary corrections prior to the issuance of a Conditional Use Permit or Street Work Permit.
7. Prior to application submittal, the City strongly encourages, but does not require, a pre-submittal conference for all proposed ROW facilities. Such pre-application meeting is intended to streamline the application review through discussions including, but not limited to, the appropriate project classification, including whether the project may qualify for approval pursuant to Section 6409(a); potential concealment issues (if applicable); coordination with other City departments responsible for application review; and application completeness issues. Applicants may, but shall not be required, to bring any particular materials to a pre-submittal conference. City staff will endeavor to provide applicants with an appointment within approximately five (5) business days after receipt of a written or email request. For any applicant that schedules, attends and fully participates in a pre-application conference, the Director may grant a written exemption from a specific application requirement or requirements when the applicant shows that the information requested is duplicative of information contained in other materials to be submitted with the application or otherwise unnecessary for the City's review under the facts and circumstances in that particular case. Any such written waiver shall be limited to the project discussed at the pre-application conference and shall not extend to any other projects.
8. Applicants must submit an application at a pre-scheduled appointment. Applicants may generally submit only one (1) application per appointment, but may schedule successive appointments for multiple applications whenever feasible and not prejudicial to other applicants. City staff will endeavor to provide applicants with an appointment within five (5) business days after staff receives a written request for an appointment. Any applications received without an appointment, whether delivered in-person or any other means, shall not be considered duly filed unless the

applicant received a written exemption at a pre-submittal conference. The Director will begin to review the application once it is duly filed.

9. To promote efficient review and timely decisions, an application will be automatically deemed withdrawn by the applicant when the applicant fails to tender a substantive response to the City within ninety (90) calendar days after the City deems the application incomplete in a written notice to the applicant. The Director may, in the Director's sole discretion, grant a written extension for up to an additional thirty (30) calendar days when the applicant submits a written request prior to the 90th day that shows good cause to grant the extension. Delays due to circumstances outside the applicant's reasonable control will be considered good cause to grant the extension.
10. Within a reasonable time after the Director approves or denies an application for a permit under this Policy, the Director shall provide written notice to the applicant. All denial notice must contain the reasons for the denial.

E. APPLICATION REQUIREMENTS; SUBMITTAL AND REVIEW

1. The City shall not grant any application for any wireless telecommunications facility permit except upon a duly filed application consistent with the provisions in Policy and any written rules or regulations the Director may publish in any publicly stated format. The City Council authorizes the Director to develop and publish permit application forms, checklists, informational handouts and other related materials. Without further authorization from the City Council, the Director may from time-to-time update and alter the permit application forms, checklists, informational handouts and other related materials as the Director deems necessary or appropriate to respond to regulatory, technological or other changes.
2. General Application Requirements:
 - a. Applicants must tender to the City the fee required in the City's Master Fee Schedule. In the event that the City's Master Fee Schedule does not contain a specific fee for wireless applications, the highest fee applicable to Conditional Use Permits will be required.
 - b. Applicants must submit evidence sufficient to show that either (1) the applicant will own the wireless telecommunications equipment being proposed or (2) the applicant has obtained authorization from the owner to file the application.

- c. To the extent that the applicant claims any regulatory authorization or other right to use the public rights-of-way, the applicant must provide a true and correct copy of the certificate, license, notice to proceed or other regulatory authorization that supports the applicant's claim.
- d. A fully dimensioned site plan and elevation drawings prepared and sealed by a California-licensed engineer showing any existing wireless facilities with all existing transmission equipment and other improvements, the proposed facility with all transmission equipment and other improvements and the legal boundaries of the city right-of-way surrounding the proposed facility and any associated access or utility easements. The plans must contain all other elements and details required for site plans submitted with a Conditional Use Permit.
- e. Photographs and photo simulations that show the proposed facility in context of the site from reasonable line-of-sight locations from public streets or other adjacent viewpoints, together with a map that shows the photo location of each view angle.
- f. A written statement that includes: (a) a description of the technical objectives to be achieved; (b) an annotated topographical map that identifies the targeted service area to be benefitted; (c) the estimated number of potentially affected users in the targeted service area; and (d) full-color signal propagation maps with objective units of signal strength measurement that show the applicant's current service coverage levels from all adjacent sites without the proposed site, predicted service coverage levels from all adjacent sites with the proposed site, and predicted service coverage levels from the proposed site without all adjacent sites.
- g. The applicant must list all existing structures considered as alternatives to the proposed location, together with a general description of the site design considered at each location. The applicant must also provide a written explanation for why the alternatives considered were unacceptable or infeasible, unavailable or not as consistent with the development standards in this Article as the proposed location and design. This explanation must include a meaningful comparative analysis and such technical information and other factual justification as are necessary to document the reasons why each alternative is unacceptable, infeasible, unavailable or not as consistent with the development standards in this Article as the proposed location. If an existing facility is listed among the alternatives, the applicant must

specifically address why the modification of such wireless communication facility is not a viable option.

3. Exceptions for Section 6409 Requests

- a. In accordance with federal regulations, an applicant who requests approval pursuant to Section 6409(a) of the Middle Class Tax Relief and Job Creation Act of 2012 shall not be required to submit the materials required for a complete application described in Section E2.f and E2.g of this Policy.
- b. In addition to the requirements for a complete application described in Sections E.2.a through E.2.e of this Policy, applicants who request approval pursuant to Section 6409(a) must submit the following materials:
 - i. The plans must specifically depict and call out the original overall height of the structure and the overall height that existed on February 22, 2012 (if the structure was constructed prior to February 22, 2012).
 - ii. Evidence that the applicant holds all current licenses and registrations from the FCC and any other applicable regulatory bodies where such license(s) or registration(s) are necessary to provide wireless services utilizing the proposed wireless facility. For any prior local regulatory approval(s) associated with the wireless facility, the applicant must submit copies of all such approvals with any corresponding conditions of approval. Alternatively, the applicant may submit a written justification that sets forth reasons why prior regulatory approvals were not required for the wireless facility at the time it was constructed or modified.
 - iii. A written statement that explains in plain factual detail whether and why Section 6409(a) and the related FCC regulations at 47 C.F.R. § 1.40001 et seq. require approval for the specific project. A complete written narrative analysis will state the applicable standard and all the facts that allow the City to conclude the standard has been met—bare conclusions not factually supported do not constitute a complete written analysis. As part of this written statement the applicant must also include (i) whether and why the support structure qualifies as an existing

tower or existing base station; and (ii) whether and why the proposed collocation or modification does not cause a substantial change in height, width, excavation, equipment cabinets, concealment or permit compliance.

4. Limited Exemption for Design and Siting Criteria.

a. If strict compliance with the siting and design criteria as applied to a specific proposed personal wireless services facility would effectively prohibit the provision of personal wireless services, the City may grant a limited, one-time exemption from strict compliance if the applicant demonstrates with clear and convincing evidence all the following findings:

- i. The proposed wireless facility qualifies as a “personal wireless services facility” as defined in U.S.C 47 § 332(c)(7)(C)(ii);
- ii. The applicant has provided the City with a clearly defined technical service objective and a clearly defined potential site search area;
- iii. The applicant has provided the City with a meaningful comparative analysis that includes the factual reasons why an alternative location(s) or design(s) suggested by the City or otherwise identified in the administrative record, including by not limited to potential alternatives identified at any public meeting or hearing, are not technically feasible or potentially available; and
- iv. The applicant has provided the City with a meaningful comparative analysis that includes the factual reasons why the proposed location and design deviation is the least noncompliant location and design necessary to reasonably achieve the applicant’s reasonable technical service objectives.

5. Independent Consultants

a. The City Council authorizes the Director to, in the Director’s discretion, and at any time in the review process, select and retain an independent consultant with qualifications and expertise satisfactory to the Director.

- b. The Director may request independent consultant review on any issue that involves specialized or expert knowledge in connection with the permit application. Such issues may include, but are not limited to: (i) permit application completeness or accuracy; (ii) planned compliance with applicable RF exposure standards; (iii) whether and where a significant gap exists or may exist, and whether such a gap relates to service coverage or service capacity; (iv) whether technically feasible and potentially available alternative locations and designs exist; (v) the applicability, reliability and sufficiency of analyses or methodologies used by the applicant to reach conclusions about any issue within this scope; and (vi) any other issue that requires expert or specialized knowledge identified by the Director.

- c. The Director shall send written notice to the applicant when it elects to retain an independent consultant. The applicant shall have two (2) business days to withdraw the application without any liability for any costs or expenses in connection with the independent consultant's review.

- d. The applicant must pay for the cost and expense in connection with the independent consultant's review and participation in any meeting. Before the City incurs any costs or expenses, the Director shall require the applicant to tender a reasonable deposit, at the Director's sole discretion. In the event that the deposit is insufficient to cover all costs and expenses, the Director may either (a) require an additional deposit or (b) invoice the applicant. Any required deposit or invoice must be paid in full within ten (10) days. The City shall not issue any permit to an applicant who has not paid any applicable fee, deposit or invoice as required in this Policy.

F. STANDARD CONDITIONS OF APPROVAL

All applications for a permit under this Policy shall be subject to the standard conditions of approval provided in this section and the Fresno Municipal Code as applicable (i.e. the procedures related to conditional use permits). The Director may add, remove or modify any conditions of approval as necessary or appropriate to protect and promote the public health, safety and welfare.

1. The permit will automatically expire 10 years from the issuance date, except when California Government Code section 65964(b), as may be amended, authorizes the City to issue a permit with a shorter term.
2. Any application to renew this permit must be tendered to the City between 365 days and 180 days prior to its expiration, and must be accompanied by all required application materials, fees and deposits for a new application as then in effect. The City shall review an application for permit renewal in accordance with the standards for new facilities as then in effect. The [approval authority] may, but is not obligated to, grant a written temporary extension on the permit term to allow sufficient time to review a timely submitted permit renewal application.
3. Permittee shall at all times maintain compliance with all applicable federal, state and local laws, regulations, ordinance or other rules.
4. The City or its designee may enter onto the facility area to inspect the facility upon reasonable notice to the permittee. The permittee shall cooperate with all inspections. The City reserves the right to enter or direct its designee to enter the facility to support, repair, disable or remove any elements of the facility in emergencies or when the facility threatens imminent harm to persons or property.
5. The site and the facility, and related transmission equipment, must be maintained in a neat and clean manner and in accordance with all approved plans and conditions of approval.
6. Permittee acknowledges and agrees that each and every aspect and/or element of the wireless facility, including without limitation its coloring, finishes, placement, orientation and proportionality with the structures in the immediate vicinity, that, by its sense and context, aids, contributes or otherwise furthers the concealment of the facility, in whole or in part, shall be deemed to be a concealment element of the support structure.
7. Permittee shall promptly remove any graffiti on the wireless facility at permittee's sole cost and expense, and in no instance more than forty-eight (48) hours from the time of notification by the City or after discovery by the permittee.

8. The permittee and, if applicable, the non-government owner of the private property upon which the tower/and or base station is installed shall defend, indemnify and hold harmless the City, its agents, officers, officials and employees (i) from any and all damages, liabilities, injuries, losses, costs and expenses and from any and all claims, demands, law suits, writs of mandamus and other actions or proceedings brought against the City or its agents, officers, officials or employees to challenge, attack, seek to modify, set aside, void or annul the City's approval of the permit, and (ii) from any and all damages, liabilities, injuries, losses, costs and expenses and any and all claims, demands, law suits or causes of action and other actions or proceedings of any kind or form, whether for personal injury, death or property damage, arising out of or in connection with the activities or performance of the permittee or, if applicable, the private property owner or any of each one's agents, employees, licensees, contractors, subcontractors or independent contractors. In the event the City becomes aware of any such actions or claims the City shall promptly notify the permittee and the private property owner and shall reasonably cooperate in the defense. It is expressly agreed that the City shall have the right to approve, which approval shall not be unreasonably withheld, the legal counsel providing the City's defense, and the property owner and/or permittee (as applicable) shall reimburse City for any costs and expenses directly and necessarily incurred by the City in the course of the defense.
9. Permittee shall take all reasonable efforts to avoid undue adverse impacts to adjacent properties and/or uses that may arise from the construction, operation, maintenance, modification and removal of the facility.
10. Permittee shall not use any backup or standby power generator except (1) when necessary due to a primary power source failure or (2) for routine maintenance/cycling. Permittee shall not operate the generator for maintenance/cycling more frequently than twice per month and then only for no longer than 30 minutes at a time Monday-Friday between 7am and 6pm.

G. DEFINITIONS

1. "Wireless Telecommunications Facility" – A combination of ground mounted equipment (often in cabinets or shelters), necessary utilities, and a slim line monopole with supporting antennas and cabling required to provide communications services.
2. "Antenna" means any system of wires, poles, rods, reflecting discs, dishes, whips, or other similar devices used for the transmission or reception of electromagnetic waves.

3. “Radome” – Cylindrical, external sheath covers the antenna arrays mounted to a mast. The purpose of the radome is to conceal the antennas mounted to the telecommunication mast. The radome is constructed of an RF transparent material and painted to match the pole a condition of approval.

H. REFERENCES

Section 15-2759. TELECOMMUNICATIONS AND WIRELESS FACILITIES

Telecommunications and Wireless Facilities shall comply with the City's policy pertaining to said uses. Said policy shall establish standards and procedures to regulate the development, siting, installation, and operation of wireless telecommunications antennas and related facilities consistent with the applicable requirements of federal law. The regulations are intended to provide for the appropriate development of wireless telecommunication facilities within the city to meet the needs of residents, business-owners, and visitors while protecting public health and safety and preventing visual blight and degradation of the community's aesthetic character.

Section 15-5302. CONDITIONAL USE PERMITS; APPLICABILITY

A Conditional Use Permit is required for any use specifically identified in any other section of this Code which requires a Conditional Use Permit.

Section 15.5306. CONDITIONAL USE PERMITS; REQUIRED FINDINGS

Finding 1: The proposed use is allowed within the applicable zoning district and complies with all other applicable provisions of this Code and all other chapters of the Municipal Code (Section 15-5306-A).

Finding 2: The proposed use is consistent with the General Plan and any other applicable plan and design guideline the City has adopted (Section 15-5306-B).

Finding 3: The proposed use will not be substantially adverse to the public health, safety, or general welfare of the community, nor be detrimental to surrounding properties or improvements (Section 15-5306-C).

Finding 4: The design, location, size, and operating characteristics of the proposed activity are compatible with the existing and reasonably foreseeable future land uses in the vicinity (Section 15-5306-D).

Finding 5: The site is physically suitable for the type, density, and intensity of use being proposed, including access, emergency access, utilities, and services required (Section 15-5306-E).

Section 15-5307. CONDITIONS OF APPROVAL

In approving a Conditional Use Permit, the decision-maker may impose reasonable conditions or restrictions deemed necessary to:

- A. Ensure that the proposal conforms in all significant respects with the General Plan and with any other applicable plans or policies and design guidelines adopted by the City Council;
- B. Achieve the general purposes of this Code or the specific purpose of the zoning district in which the project is located;
- C. Achieve the findings for a Conditional Use Permit listed in https://www.municode.com/library/ca/fresno/codes/code_of_ordinances?nodeId=MUCOCHFRCA_CH15CIDECOINRE_PTVADPE_ART53COUSPE_S15-5306REFI, Required Findings; or
- D. Mitigate any potential impacts identified as a result of environmental review conducted in compliance with the California Environmental Quality Act.