

2016-11-03

The CUP/SPR distinction didn't sink in last night.

I do think the CUP is more appropriate for this situation than SPR. Here's why:

1. We want to regulate a USE not a SITE.
2. Submission requirements could be simpler: SPR has a long list of required submissions. CUP allows PB to determine what information is required making the submission requirements only as extensive as required for the proposed use. ...and, what if the PB wanted something that's NOT in the SPR list of submissions? CUP would allow that
3. CUP allows for continued monitoring of a use (think of Severino) to the extent appropriate (or not if unnecessary). SPR has no provision for such continuing control.

I see these as strong arguments in favor of CUP.

...also, look at Article III of SPR. This would need revision to include proposed application of SPR.

Bob