to: Atascadero City Council

re: Supplement to Appeal of 7-18-23 Planning Commission

Approval of a CUP for RV Storage Facility at 6805 Sycamore

Rd.

from: David Broadwater

date: 9-8-23

This is a supplement to be included as an integral part of and to be attached to the appeal I filed on 7-20-23 for the purpose of refining my request that the City Council deny the Conditional Use Permit for this RV storage facility.

Included herein are:

- Relevant excerpts from the minutes of the 6-20-23 and 7-18-23 Planning Commission meetings,
- · Relevant excerpts from the current General Plan,
- Relevant excerpts from documents relating to the General Plan Update,
- My 7-14-23 comments to the Planning Commission, and
- My 7-20-23 appeal of the CUP approval.

I've mentioned my objections to the categorical exemption granted for this CUP in my comments to the Planning Commission and appeal to the City Council. I would add that I see no evidence that an initial study was conducted regarding potential environmental impacts under CEQA (California Environmental Quality Act) guidelines, and no evidence of an effort to consider either a Negative Declaration or Mitigated Negative Declaration under those guidelines. Additionally, I've seen no evidence that any alternatives analysis has been conducted to determine whether other sites in the City could provide the service of RV storage with less potential negative environmental impacts.

As may become apparent when considering this proposed project in relation to the General Plan and its pending updated version, there are number of opportunity costs involved with approval of this CUP. There may be additional potentially missed opportunities beyond those made apparent by the General Plan updating process. The

foreclosure of these opportunities should be given serious consideration and subjected to due discussion and deliberation.

RELEVANT EXCERPTS FROM THE MINUTES OF THE 6-20-23 AND 7-18-23 PLANNING COMMISSION MEETINGS:

In three of the four motions made at the 6-20-23 meeting:

Two Commissioners moved to deny the project "pending review of this property with the future General Plan" due to its inconsistency with the area's natural character and orderly development, its proximity to the Salinas River, and potential negative impacts on wildlife.

Two Commissioners moved to deny the project due to its being "inconsistent with the General Plan" and the "land use and conservation policy of the General Plan" goal to "enhance the rural character and appearance of the city".

Two Commissioners moved to "continue the Conditional Use Permit (CUP) USE21-0107 until staff reviews the General Plan analysis where the City Council feels comfortable with the future land use designation on this site."

The first two motions failed and the third passed unanimously.

It is apparent, therefore, that the three Commissioners who made the first two motions consider this project either inconsistent with the current General Plan or inconsistent with its updated version.

It's also apparent that all of the commissioners present desired to wait for the City Council's assessment of this project in the context of the pending updated General Plan. No such assessment took place. When asked by this appellant via email, in reference to the third unanimous motion cited above, "Has such a review regarding an 'analysis where the City Council feels comfortable with the future land use designation on this site' occurred?", Community Development Director, Phil Dunsmore, on 8-21-23 replied via email, "No such analysis has occurred."

Note that the Community Development Director stated that the future uses of properties similarly zoned will be decided within the next few months, and that this property is within the Salinas River flood plain.

I encourage the City Council to take these perspectives into account when considering whether to deny this CUP.

Minutes of 6-20-23 Planning Commission meeting:

http://records.atascadero.org/WebLink/ElectronicFile.aspx?docid=11 9081&dbid=0

CITY OF ATASCADERO
PLANNING COMMISSION AGENDA
REGULAR MEETING
Tuesday, July 18, 2023

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CITY OF ATASCADERO PLANNING COMMISSION

DRAFT MINUTES

Regular Meeting - Tuesday, June 20, 2023

. . .

4. CONDITIONAL USE PERMIT FOR 6805 SYCAMORE ROAD (CONTINUED FROM 11-15-22)

The proposed project is a request to add RV storage lot to an existing site for VSM Leasing & Rentals with an exception to minimum landscape standards on APN 028-121-001. (USE21-0107)

• Recommendation: Staff's recommendation is for the Planning Commission to allow a new business for outdoor recreational vehicle (RV) storage in the Industrial Park zone.

PUBLIC COMMENT

The following members of the public spoke: Don McAdam (who answered questions from the Commission), Kate Montgomery, Audrey Taub, Fred Frank, and Doug Reynolds.

Commissioners discussed whether this area was being evaluated with the General Plan Update. Director Dunsmore stated that staff has not made a determination on future uses of Industrial zones, and that the City will be making these decisions in the next 6-8 months.

Chairperson van den Eikhof asked if **this parcel** is still in the flood plain, and Director Dunsmore stated that it **is in a flood plain**.

Chairperson van den Eikhof closed the Public Comment period. [page 4]

MOTION:

By Vice Chairperson Keen and seconded by Commissioner Carranza to adopt draft Resolution **denying** Conditional Use Permit (CUP) USE21-0107 allowing a new business for outdoor Recreational Vehicle storage in the Industrial Park zone **pending review of this property with the future General Plan**, because of the finding #4 that this **project will be inconsistent** with the **character of the immediate neighborhood** or contrary to its orderly development because of its location **near the Salinas river**, since the riverbed is full of animals and this could potentially have **negative effects of wildlife** in the area. Because it's **inconsistent** with the **natural character** of its current setting.

Motion failed 4:2...

MOTION:

By Commissioner Carranza and seconded by Commissioner Anderson to adopt draft Resolution **denying** Conditional Use Permit (CUP) USE21-0107 allowing a new business for outdoor Recreational Vehicle storage in the Industrial Park zone, because of Finding #1, the project is **inconsistent with the General Plan** specifically the portion that states "enhance the rural character and appearance of the city including commercial corridor, gateways and public facilities, **land use and conservation policy of the General Plan**. She would like to see this item tabled until the next General Plan is finalized, instead of denied

Motion failed 3:3...

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MOTION:

By Commissioner Anderson and seconded by Vice Chairperson Keen to **continue** the Conditional Use Permit (CUP) USE21-0107 until **staff reviews the General Plan analysis** where the **City Council feels comfortable with the future land use designation** on this site.

Motion passed 6:0...

During the 7-18-23 Planning Commission meeting, only one motion was made regarding this CUP, which passed by one vote to approve it.

http://records.atascadero.org/WebLink/ElectronicFile.aspx?docid=12 0669&dbid=0

CITY OF ATASCADERO PLANNING COMMISSION AGENDA REGULAR MEETING Tuesday, September 5, 2023

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DRAFT MINUTES Regular Meeting - Tuesday, July 18, 2023

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3. CONDITIONAL USE PERMIT FOR 6805 SYCAMORE ROAD (CONTINUED FROM 6-20-23)

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MOTION:

By Commissioner Schmidt and seconded by Commissioner Hughes to approve the Conditional Use Permit (CUP) USE21-0107 allowing a new business for outdoor Recreational Vehicle (RV) storage in the Industrial Park zone, with the included additional condition recommended by staff.

Motion passed 4:3 by a roll-call vote. (Anderson, Carranza and Keen voted no)

Findings:

Below, in the minutes of the 6-20-23 Planning Commission meeting including the Staff Report recommending approval of the CUP for this RV storage facility, are four of the findings used to justify its approval. They assert that, because it's "consistent with the General Plan", it won't be "detrimental to the general public", isn't "inconsistent with the character" of the area, and the property is "zoned Industrial Park", this use of it should be approved.

These assertions are invalid when the current General Plan and the documented planning for its revision are taken into account. Regarding the former, as clearly stated in current Open Space Policy Goal LOC 6, Policy 4: "Scenic and sensitive lands including creeks, riparian corridors, wetlands and other areas of significant habitat

value shall be protected from destruction, overuse, and misuse by the use of zoning... ".

The records of the 6-20-23 and 7-18-23 Planning Commission meetings show that, in two of the four findings subject of this supplement, the Industrial Park zoning of this land is used to support approval of this CUP. The City Council is required by the General Plan to consider whether this constitutes "misuse by the use of zoning".

A perusal of the current General Plan and information generated regarding its pending revision will demonstrate that these findings cannot withstand scrutiny and are unfounded.

The same applies to four of the findings made at the 7-18-23 Planning Commission meeting, which are identical to those made during the 6-20-23 meeting. This appellant was provided with the findings declared at the 7-18-23 Planning Commission meeting by a Community Development Department Assistant Planner on 8-11-23 who wrote, "The following are the full list of findings from the July 18 Planning Commission hearing on the Sycamore RV project.". Among them are the four findings identical to those made on 6-20-23 cited above and included below in the Draft Minutes of the 6-20-23 meeting. It would be superfluous and needlessly repetitive to include the text of those findings in this supplement.

They correspond with four of the seven required findings for approval of CUPs listed in Title 9 – Planning & Zoning of the Municipal Code, Chapter 2 - Applications: Content, Processing & Time Limits, Section 9-2.110 – Conditional Use Permit, specifically:

(i) Conditions of Approval. After the conclusion of a public hearing, the Planning Commission may approve, conditionally approve, or disapprove the conditional use permit. In conditionally approving a conditional use permit, the Planning Commission shall designate such conditions to satisfy any requirements of CEQA...:

...

- **(iv) Required Findings.** If the Planning Commission approves or conditionally approves a conditional use permit, it **shall** first find that:
 - a. The proposed project or use is consistent with the

...

- c. The establishment, and subsequent operation or conduct of the use will not, because of the circumstances and conditions applied in the particular case, be detrimental to the health, safety or welfare of the general public or persons residing or working in the neighborhood of the use, or be detrimental or injurious to property or improvements in the vicinity of the use; and
- d. The proposed project or use will not be inconsistent with the character of the immediate neighborhood or contrary to its orderly development; and

..

f. The proposed project is in compliance with any pertinent city policy or criteria adopted by ordinance or resolution of the city council; and

...

http://records.atascadero.org/WebLink/ElectronicFile.aspx?docid=11 9081&dbid=0

CITY OF ATASCADERO PLANNING COMMISSION AGENDA REGULAR MEETING

Tuesday, July 18, 2023

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[approved] **DRAFT MINUTES** [page 1 of 6]

Regular Meeting - Tuesday, June 20, 2023

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Atascadero Planning Commission [page 23]

Staff Report - Community Development Department

Sycamore RV Storage USE 21-0107

(VSM Leasing & Rentals LLC)

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ATTACHMENTS: Attachment 1: June 20, 2023 Planning Commission Staff Report [page 26]

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DRAFT RESOLUTION [page 36]

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SECTION 3. Findings. The Planning Commission makes the following findings, determinations and approvals [page 37]

1. Findings for Approval of a Conditional Use Permit

FINDING: The proposed project or use is consistent with the General Plan

FACT: The use is consistent with the General Plan. Specifically, it relates to intended uses in the Industrial Park zone. The General Plan states that one of the intended uses of this zone is for outdoor storage facilities. General Plan Policy 14.2 aims to identify locations with adequate land to accommodate industrial uses to retain and expand existing businesses. The municipal code allows outdoor vehicle storage operations with a conditional use permit.

. . .

FINDING: The establishment, and subsequent operation or conduct of the use will not, because of the circumstances and conditions applied in the particular case, be detrimental to the health, safety or welfare of the general public or persons residing or working in the neighborhood of the use, or be detrimental or injurious to property or improvements in the vicinity of the use

FACT: The proposed recreational vehicle storage facility will not be detrimental to the general public or working person's health, safety, or welfare.

FINDING: The proposed project or use will not be inconsistent with the character of the immediate neighborhood or contrary to its orderly development

FACT: The proposed project is on a property that is zoned Industrial Park with a construction yard on it. The property is at the edge of the city in an area that has been designated for industrial uses.

. . .

FINDING: The proposed project is in compliance with any pertinent City policy or criteria adopted by ordinance or resolution of the City Council.

FACT: The project is consistent with the General Plan and municipal code, as conditioned.

. . .

RELEVANT EXCERPTS FROM THE CURRENT GENERAL PLAN:

Included herein are excerpts from the Open Space Policies of the Land Use, Open Space & Conservation Element of the current

General Plan. They include evidence that the RV storage CUP is, in fact, inconsistent with the current General Plan and contradict findings that it is, e.g., findings that it will not be detrimental to the health, safety or welfare of the general public, findings that it will not be inconsistent with the character of the immediate neighborhood, and findings that, simply because the property is currently zoned as Industrial Park, other factors that must be included in decision-making may be neglected or overridden.

Of note, the Open Space Policy cites the need for protection of the Salinas River corridor from detrimental developments.

Please examine this RV storage project in light of the current General Plan's Open Space Policies and find that it is inconsistent with them. Selected text in Open Space Policies is highlighted in **BOLD** to indicate those with which this CUP may be deemed by the City Council to be inconsistent, and to support findings that it should be denied.

https://www.atascadero.org/files/CD/General%20Plan/AtasGP-CH2-LU.Con.OS.pdf

Land Use, Open Space & Conservation Element June 25, 2002

. . .

E. Land Use, Open Space, and Conservation Goals, Policies and Programs [page II-13]

. . .

2. Open Space Policies [page II-27]

. . .

Goal LOC 6. Preserve natural flora and fauna and protect scenic lands, sensitive natural areas...

Policy 6.1: Ensure that development does **not degrade scenic and sensitive areas**, including historic sites, **creeks**, **riparian corridors**, **wetlands**, woodlands, hillsides and other valuable **habitats**.

Programs:

. . .

4. Scenic and sensitive lands including **creeks**, **riparian corridors**, **wetlands** and other areas of significant **habitat** value

shall be protected from **destruction**, **overuse**, and **misuse by the use of zoning**, tax incentives, easements, or fee acquisition.

- 5. Public and private development in **close proximity** to scenic and sensitive lands, including **creek reservations**, wooded areas, **flood plains**, prominent view sheds and historic sites **shall** be designed to **minimize impacts**.
- 6. Scenic and open space easements, parklands and **open space dedications shall** be **required** as mitigation for subdivisions and development projects that impact, **floodplains**, **creek reservations**, wooded areas, scenic backdrops, sensitive areas, historic sites, cultural sites, and similar areas.
- 7. The City **shall** carefully evaluate both public and private projects to **require the preservation** of trees, **watersheds**, natural slopes, and **other natural features**.

. . .

Goal LOC 8. **Watershed** areas of Atascadero **shall be protected**. Policy 8.1: **Ensure** that **development** along Atascadero Creek, Graves Creeks, the **Salinas River**, blue line creeks, and natural springs, lakes, or other **riparian areas** does **not** interrupt natural flows or **adversely impact riparian ecosystems** and water quality.

Programs:

- 1. **Work with other agencies** to implement the Erosion Control Assistance Program for **review** of development proposals to **minimize sedimentation** of creeks and the **Salinas River**.
- 2. Update the Appearance Review Manual to include provisions for **preserving**, **reclaiming and incorporating riparian features** in conjunction with new development.
- 3. The waterways in the City shall be maintained in a natural state...

...

6. **Prohibit** new structures or **disturbance** of **riparian habitat** along **creek banks** except for restoration purposes.

...

8. Prior to permit approval, refer projects along blue-line creeks to the Corps of Engineers, Department of Fish and Game, Regional Water Quality Control, and Upper Salinas-Las Tablas Resource Conservation District.

- 9. Creek reservations and the **Salinas River shall be**preserved for open space and recreational use, with
 appropriate areas **left in their natural state** for public
 enjoyment and habitat purposes. Any recreational use of the River
 and creeks shall minimize its impact on the habitat value and
 open space qualities of the creeks.
- 10. Land disturbance shall be minimized in proximity to watercourses including necessary flood protection measures, such as selective brush clearing, and low-impact trail development.
- 11. **Areas subject to flooding**, as identified through flood hazard overlay zoning and flood maps, **shall be protected** from unsound development consistent with the City's flood hazard ordinance requirements.

. . .

- 13. Support the establishment and protection of floodable terraces, wetlands, and revegetation along creeks and streams.
- Policy 8.2: Establish and **maintain setbacks** and development standards for **creek side development**.

Program:

1. Adopt and maintain a creek setback ordinance that will establish building **setbacks** and development standards **along the banks** of Atascadero Creek, Graves Creek, blue line creeks and the **Salinas River** to ensure the uninterrupted natural flow of the streams and **protection** of the **riparian ecosystem**...

..

Policy 8.3: **Preserve public creek reserves** for **public access**, and ensure that recreational use does not impact habitat value and open space qualities.

Programs:

- 1. **Develop** park, **trail**, and **recreational amenities** where appropriate in public **creek reserves**.
- 2. **Require** the dedication of **trail easements** and **access points** as part of subdivision maps or development permits consistent with the Circulation Element.

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Goal LOC 11. Provide an adequate supply of City park facilities to all

Atascadero residents.

Policy 11.1: **Acquire parkland** needed for future development of **park and recreation facilities** and ensure that park improvements are consistent with adopted master plans to accommodate future growth.

Programs:

...

- 7. **Require** new subdivisions along the Salinas River to provide controlled **public access** to the **Salinas River** and **De Anza Trail** for **pedestrian and equestrian recreation**.
- 8. Support the development of equestrian staging areas and trail systems throughout the community including a Salinas River / De Anza trailhead at the north end of town and other appropriate locations.

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RELEVANT EXCERPTS FROM DOCUMENTS RELATING TO THE GENERAL PLAN UPDATE:

Included herein are excerpts from two documents generated as part of the process of updating the General Plan as they pertain to decision-making on the proposed RV storage project. They address many goals related to the preservation, enhancement, enjoyment, and educational and economic value of our natural surroundings. Please note, especially, the last sentence included here in the Existing Conditions Atlas:

"the Salinas River has been identified as a key natural resource that should be protected and bolstered as a regional attraction for tourism, recreation, and education."

Please also note that in the Community Engagement Series #1 Summary under Recreation and Open Spaces - "Protect and Preserve Native Flora, Fauna and Habitat" is this:

"regenerate/protect native wildlife, habitat, and plants, specifically beavers".

The unanimous motion of the Planning Commission on 6-20-23 to refer this project to the City Council for consideration in the context of the pending General Plan update indicates a strong consensus for

reconsideration of the 7-18-23 approval of this CUP by the City Council now, and, perhaps, the possibility of considering a future application for an RV storage facility after the General Plan Update is completed.

Please examine this RV storage project in light of the "vision for the future" foreseen as we update our General Plan, and find that it is inconsistent with it.

Selected text in these documents is highlighted in **BOLD** to indicate findings the City Council may deem supportive of a denial of this CUP, and to indicate some of the opportunity costs that may result from an approval of this RV storage facility.

https://www.atascadero2045.org/files/managed/Document/84/AGPU_Comm%20Engagement%20Series%201%20Summary_7.25.23.pdf

Community Engagement Series #1 Summary: Vision for the Future

City of Atascadero 2045 General Plan Update - July 25, 2023

. . .

Existing Conditions Atlas (January 2023) [page 6]

. . .

Summary of Major Themes [page 7]

. . .

Recreation and Open Spaces [page 11]

- Increase Walking/Biking Trails. Recommendations to create more walking and biking and walking trails and make connections between existing trails, parks and open spaces and throughout the city. ...
- Increase or Improve and Maintain Parks and Open Space.
 Acquire and create more parks and open space, including multi-use parks. Extend or incorporate into open space and/or revitalize locations such as Atascadero Lake, Eagle Lake, Three Bridge Oak Preserve, Paloma Creek, among others. ...
- Value Rivers as a Community Asset. Create more community amenities, open space, access points and paths all along creeks and rivers (particularly the Salinas River throughout town) with amenities (tables/benches, places to recreate) to make them safer and more enjoyable. Maintain regular stream/creek

cleanups. **Create** a **river center** for **research** (Cal Poly/Cuesta students/professors) and **education**.

- Parks and Open Space as Economic Opportunity. As also addressed under Economic and Fiscal Health, creating more attractions, open spaces, increasing and improving parks, river-related features and recreational options and events promoting their use will help create jobs, draw visitors interested in nature and ecotourism.
- Protect and Preserve Native Flora, Fauna and Habitat. Plant more trees in the city (also addressed under Infrastructure); regenerate/protect native wildlife, habitat, and plants, specifically beavers and native oaks (e.g., extending Three Bridges Oak Preserve)
- Provide More Outdoor Recreational Facilities and Activities.

...

 Provide Family-Inclusive and Age-Specific Activities. Provide activities that are inclusive of all ages... caring for playgrounds and connecting them to trails providing easy hikes and nature walks with educational signage.

. . .

https://www.atascadero2045.org/files/managed/Document/62/AGPU _Atlas_Revised%20Admin%20Draft_01-24-23.pdf

Existing Conditions Atlas

Revised Administrative Draft | January 24, 2023

. . .

Recreation and Open Spaces [page 14] Challenges and Emerging Opportunities Parks, Open Spaces and Trails: ...

- ... Opportunities exist to **improve linkages** to parks through **new or expanded trails** (... **Juan Bautista de Anza National Historic Trail**).
- ... **New trail connections** could be created to better **link** major recreational destinations and the **Salinas River**...

...

Creeks and Rivers: ... The waterways provide important wildlife corridors connecting the Salinas River to the Santa Lucia Mountains are designated critical habitat areas for South-Central

California Steelhead Trout. They also **provide recreational opportunities** for many residents. The creeks have been highly impacted by problems with trash, illegal dumping, off-road vehicle use, and urban pollution that has significantly degraded the quality of the habitat. **Protecting and enhancing** these areas can better **support the local ecosystem**, and improve water flow (and reduce localized flooding risks), and **increase the quality of life** for residents. In addition, the **Salinas River** has been identified as a **key natural resource** that should be **protected and bolstered** as a **regional attraction** for **tourism**, **recreation**, and **education**.

. . .

My 7-14-23 comments to the Planning Commission:

Subject: Atas Plan Comm 7-18-23 Agenda - RV Storage Lot

From: David Broadwater <csi@thegrid.net>

Date: July 14, 2023 9:31:39 PM PDT

To: jvandeneikhof@atascadero.org, tkeen@atascadero.org, janderson@atascadero.org, vcarranza@atascadero.org, rhughes@atascadero.org, gheath@atascadero.org, dschmidt@atascadero.org

to: Atascadero Planning Commission

re: Sycamore RV Storage

date: 7-18-23

I've lived in Atascadero for 51 years, owned a home here for 45 years, raised two children here who are raising my four grandchildren here - over a half century and three generations making this town our home. For years, I've hiked along the Salinas River with them for miles up- and down-stream from the trail head near the sewage plant. I know this river, seen the beaver dams, the fish living in their pools, the waterfowl, the lush vegetation, and experienced it as the most easily accessible place close to town where the wild lives and refreshes one's relationship with, and appreciation of, nature.

The value of this river and watershed is immeasurable, as is the damage to both the river's wildness and its human neighbors if this plan is approved. You must stop this.

In the Staff Report, under "Project Info In-Brief", the project is

given a categorical exemption from CEQA, i.e., no EiR or even a mitigated negative declaration. I've seen no evidence that the potential impacts of this project could have on the floodplain, watershed, groundwater, riparian habitat, marsh land, beavers, fish, waterfowl, and the human interaction and experience have been examined.

This vote must not proceed without incorporating these factors into your deliberations.

Please either deny this application or, once-again, postpone a decision until an adequate analysis of the potential impacts is conducted. It's the least we owe to this river that gives us the water we use, the plants and animals retaining it recharging our groundwater supply, and a place where we can relax and absorb this wonderful wild space near town.

David Broadwater Atascadero

My 7-20-23 appeal of the CUP approval:

Subject: Appeal of 7-18-23 Planning Commission permit for RV

Storage near Salinas River

From: David Broadwater <csi@thegrid.net>

Date: July 20, 2023 10:45:19 PM PDT

To: Lara Christensen < lchristensen@atascadero.org >

to: Atascadero City Clerk

re: Appeal of Planning Commission Approval of 6805 Sycamore

Road RV Storage date: 7-20-23

This is an appeal to the Atascadero City Council to rescind the Planning Commission's 7-18-23 approval of a permit for an RV storage facility within the Salinas river watershed.

On 7-18-23, the Planning Commission approved a permit for a 6-acre RV storage facility within the Salinas River watershed at 6805 Sycamore Road. Many public comments opposed to this permit were registered both in person and digitally, including mine. None of those posted on-line over months of meetings since November 2022 were in favor of the permit.

This project was given a categorical exemption from CEQA according to the 6-20-23 Planning Commission Staff Report. There is no distinct section in that report devoted to any

environmental analysis of the site by any person or agency qualified to conduct such an analysis. The report includes the headings "Project site", "Project description", "Project Review History", "Analysis", "Archaological Assessment", "Landscaping", "Fencing, lighting and security", and "Storage Yard Conditions".

There is no evidence that the project has been reviewed by qualified professionals regarding the environmental, recreational, social and aesthetic values of the site and the river's watershed, or the potential impacts on beaver habitat which brings us the benefits of water retention, groundwater recharge, and wildlife and riparian enhancement.

The approval of this project was, therefore, based on insufficient and insubstantial information and grounds, lacking in proper analysis of its potential consequences. It must be reviewed, reevaluated and rejected by the City Council, until such time that a proper evaluation is conducted.

David Broadwater Atascadero