

Draft Responses to Comment Letter EE

Palomar Observatory
Andy Boden
March 18, 2013

	Comment	Response to Comment
EE -1	<p>Andy Boden here from the California Institute of Technology (Caltech) and Palomar Observatory. Thank you again for your time in our conversation this afternoon, and in being proactive in contacting us at Palomar Observatory concerning this update to the Forest Conservation Initiative (FCI) Lands General Plan Amendment (GPA) Supplemental Environmental Impact Report (SEIR) for regions in North San Diego County that include and surround Palomar Observatory.</p> <p>We at the observatory are grateful to have had a long and productive relationship with both the communities near the observatory, and with San Diego County in general. The continued sensitivity of our neighbors to environmental effects that might adversely impact our shared quality of life, and the observatory and its research mission is deeply appreciated by all who support and use Palomar Observatory.</p>	<p>This comment is introductory in nature and does not raise a significant environmental issue for which a response is required.</p>
EE -2	<p>In reviewing the materials forwarded by your office, we were particularly looking for items that might be impactful to Palomar Observatory either in compromising our ability to conduct the scientific observations of its core mission, or in items or effects that might adversely impact observatory operations and/or safety. These can broadly be categorized as follows:</p> <p>1) Items that would contribute to the nighttime light pollution of the North San Diego skies. Aside from</p>	<p>This comment is acknowledged; however, does not raise a significant environmental issue for which a response is required.</p>

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	<p>compromising the dark-sky appreciation of all San Diego County residents, scattered light from human-made sources such as house lights, street lights, or billboards adversely impacts our ability to observe the astronomical objects that Palomar Observatory was built to study.</p> <p>2) Items that might compromise our ability to have reliable infrastructure (e.g. utilities, data communication) to support observatory operations.</p> <p>3) Items that might potentially constitute an increases risk of property incursion and/or safety of observatory personnel.</p>	
EE -3	<p>With respect to specific comments, there were a number of items that we felt it was important to bring to your attention.</p> <p>1) Section S.1 of the SEIR Executive Summary lists the various environmental impacts considered as a part of the SEIR (e.g. Aesthetics, 2 Hydrology & Water Quality, Noise, Climate Change). From the perspective of Caltech and Palomar Observatory, a particularly notable absence in this list is consideration of Light Pollution in the SEIR. Obviously considerations of Light Pollution in San Diego County skies are critically important for Palomar Observatory -- as stray light from human sources compromise our ability to continue Palomar Observatory's astronomical research mission. However, beyond our own interests it is clear that many San Diego County residents value the dark nighttime sky and opportunity that provides to enjoy the natural stellar canopy. Because of this common interest, in this matter we think it is clear that the SEIR +should+ be amended to include considerations of light pollution in its assessment and findings.</p>	<p>The County does not agree that the SEIR does not address light pollution. Light pollution was considered in the draft SEIR under the topic heading of Aesthetics, in Chapter 2. The SEIR includes a thorough analysis of light pollution issues, recognizing the importance of dark skies and the observatories. Although, the draft SEIR includes mitigation measures to address light pollution, the draft SEIR concludes impacts would be significant and unavoidable.</p>
EE -4	<p>2) Concerning reductions in the population density zoning being considered for the areas atop Palomar Mountain, we are in complete agreement that summit population density</p>	<p>This comment is referencing the reductions in density of the Draft Plan (SEIR Proposed Project) over the current General Plan. The support for this map is acknowledged and the</p>

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	<p>should be carefully assessed in light of retaining the communities rural character and traditions. The Palomar summit is a confined space with limited area and resources, and we would discourage zoning decisions that fundamentally change the character of the area, or significantly strain available resources. Further, it is clear that a significant increase of mountain population would inevitably lead to a higher level of light pollution atop Palomar Mountain, which of course adversely impact's the observatory research mission. For these reasons, we strongly encourage the zoning reductions that we discussed in our phone conversation on 18 March, and as codified in the SEIR document you made available for our review.</p>	<p>information in this comment letter will be in the Final SEIR for review and consideration by the County Board of Supervisors. The Staff Recommendation land use map is also proposing reduced densities in this area, and actually has further density reductions than the Proposed Project; therefore should be consistent with the support shown by this comment. Ultimately, the Board of Supervisors will determine which land use map will be implemented.</p>
<p>EE -5</p>	<p>3) The provisions in the GPA Appendix A that allow for the establishment of multi-use communication structures in the North Mountain area. We agree that additional communications infrastructure at Palomar could have a significant positive impact for all residents – ourselves included. And we appreciate the clear thoughtfulness in preparation of the SEIR in terms of protecting Palomar Observatory's interests. However, we at the observatory also heavily rely on microwave data communications equipment for our data infrastructure -- without this equipment we could not support the observatory's research program. So from our standpoint it is imperative that we are able to work with San Diego County and any communication structure proponents to make sure that such proposed developments do not adversely impact observatory data communications. [And we appreciate a cordial and constructive phone conversation with a Ms. Michelle Chan from your office on these points.]</p>	<p>Issues raised in this comment are not related to an environmental issue pursuant to CEQA.</p>

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EE -6	In closing, thank you again for the opportunity to comment in this particular planning and assessment process, for your consideration of our thoughts in these matters, and for the continued productive relationship we enjoy with San Diego County and its residents.	This concluding comment does not raise a significant environmental issue for which a response is required.