

**Letter to: California Public Utilities Commission
Public Advisor's Office**

Subject: Formal Objection to Proposed Transmission Line Across Palomar Mountain

I am writing to formally object to any proposed transmission route traversing Palomar Mountain. Constructing high-voltage infrastructure across this ecologically sensitive, high-risk landscape poses severe threats to public safety, local resources, and irreplaceable cultural heritage.

1. Severe Wildfire Risk and Aerial Firefighting Obstruction: The California Public Utilities Commission (CPUC) designates Palomar Mountain as a Tier 3 High Fire Threat Area—the highest level of utility-wildfire risk. Combining extreme winds, heavy fuel loads, active seismic faults, and limited evacuation paths creates high potential for catastrophic ignition. Furthermore, 190-foot towers will severely compromise aerial firefighting operations, eliminating the primary method used to rapidly contain small ignitions in this rugged terrain.

2. Public Safety and Evacuation Bottlenecks: The mountain features severely restricted egress. The proposed routes cross critical corridors. Downed lines or construction hazards along these limited lifelines would trap residents and visitors during an emergency.

3. Ecological, Cultural, and Hydrologic Impacts

- **Protected Species & Habitat:** The corridor directly threatens critical habitat for the endangered Laguna Mountain Skipper butterfly, California Golden Eagles, mountain lions, and rare old-growth mixed conifer forest.
- **Cultural Heritage:** Palomar holds profound importance for local Native American tribes, harboring documented archaeological sites.
- **Public Value:** Palomar serves tens of thousands of visitors annually across youth camps, state park land, and historic recreation areas.

4. Superior, Feasible Alternatives (CEQA Guidelines § 15126.6) Under CEQA, the CPUC cannot approve a project if feasible alternatives achieve project objectives while avoiding significant environmental and wildfire impacts. Viable non-destructive alternatives exist:

- **Grid Re-conductoring:** Upgrading existing corridors with advanced conductors can double or triple transmission capacity without building new towers, taking private property, or crossing state park land.
- **Distributed Storage & Microgrids:** The capital required for new high-voltage lines would be far more effectively deployed toward distributed battery storage, solar-plus-storage microgrids, and vehicle-to-grid (V2G) bidirectional charging infrastructure. Localized storage mitigates peak demand and outage risks without exposing communities to wildfire ignition hazards.

These are aligned with the CAISO 2025-2026 plan, as highlighted by the cancellation of the Serrano-Del Amo- Mesa 500kV line in May 2026.

Palomar Mountain cannot bear the catastrophic environmental, safety, and cultural costs of this project. The CPUC must reject any route over the mountain and prioritize non-destructive grid-modernization alternatives.