

## 5.9. Hazards and Hazardous Materials

<b>HAZARDS AND HAZARDOUS MATERIALS</b>				
<b>Would the project:</b>	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Significance criteria established by CEQA Guidelines, Appendix G.

### 5.9.1. Setting

This section addresses issues related to environmental hazards and hazardous materials in the existing conditions. Environmental hazards include accidental spills of hazardous materials, the presence of existing subsurface contamination, the risk of wildfire, and aircraft safety. Hazardous materials include fuel, oil, and lubricants. If encountered, contaminated soil can pose a health and safety threat to workers or the public.

#### 5.9.1.1. Existing and Past Land Uses

Existing and past land use activities are commonly used as indicators of sites or areas with potential for hazardous material storage and use or potential environmental contamination. For example, many current and historic industrial sites have soil or groundwater contamination by hazardous substances. Other hazardous materials sources include leaking underground tanks in commercial and rural areas, contaminated surface runoff from polluted sites, and contaminated groundwater plumes. The proposed Project site is in an urban area with a mix of residential, commercial, and industrial uses. Residential uses have increased significantly in density since the 1990s while oil and gas industrial uses have decreased substantially.

#### 5.9.1.2. Hazardous Materials

Construction activities routinely involve use and storage of hazardous materials such as cleaning solvents, paints, adhesives, vehicle fuels, oil, hydraulic fluid, and other vehicle and equipment maintenance fluids. The use and storage of such materials must comply with federal and state regulations. Use of hazardous materials during construction of the proposed Project would primarily consist of fluids and fuels for construction equipment and vehicles. Construction worker parking and building material staging would

occur on site in designated areas. The use, storage, transport, and disposal of hazardous materials used in construction of the facility would be carried out in accordance with federal, state, and county regulations. No extremely hazardous substances (i.e., those governed pursuant to Title 40, Part 335 of the Code of Federal Regulations) are anticipated to be produced, used, stored, transported, or disposed of as a result of the Project's construction.

### **5.9.1.3. Battery Energy Storage Systems**

A battery energy storage system (BESS) uses an array of batteries and other electrical equipment to store electrical energy. Containerized systems have become a popular means of integrating BESS projects efficiently. The battery storage enclosures include battery cells/modules, an HVAC system, a Battery Management System, and Fire Suppression.

Large-scale BESS are commonly designed for high-powered and rapid-charge cycles that can quickly generate heat that affects the safe operation of the batteries (Conzen et al., 2023). BESS require a reliable and well-performing cooling system that either directly cools the battery cell/modules or cools the enclosure in which the battery packs are installed. Failures of the BESS cooling or fire prevention systems can result in fires and explosions within BESS containers. This can occur under a variety of scenarios (e.g., a short circuit), in which the stored chemical energy is converted to thermal energy that results in cell rupture and the release of large amounts of flammable and potentially toxic gases, which can lead to fire and explosion (Conzen et al., 2023). Between 2012 and 2024, 35 large-scale BESS have experienced failures and destructive fires in the United States (ACP, 2025, p. 1).

The proposed Project BESS would be comprised of approximately 36 modular Tesla Megapack 2 XL units, each consisting of 24 lithium iron phosphate (LFP) battery modules per battery unit. The BESS would have a capacity of 30 megawatts (MW) and 120 megawatt-hours (MWh). The hazards and hazardous materials associated with battery cell malfunction of the proposed BESS include exposure to toxic air emissions from off-gassing and combustion, flammable vapors and thermal radiation from a BESS fire or thermal runaway, and contamination of water used for fire suppression. The fire prevention systems for the proposed Project's modular units would include cabinets designed to limit or eliminate the threat of the spread of fire from one cabinet to another, infrared camera monitoring at the site for external fire detection, onsite fire hydrants, and battery monitoring and control systems to shut down equipment if unsafe conditions are detected (ERM, 2025 – Appendix H [Hazards Analysis], p. 5). Furthermore, the Megapacks are equipped with ventilation systems that allow for the removal and combustion of off gassed materials, which prevents gases from building within the enclosures and becoming explosion hazards in the event of a thermal runaway (ERM, 2025 – Appendix H [Hazards Analysis], p. 5).

### **5.9.1.4. Environmental Contamination**

The Project site is located near commercial, public, quasi-public, residential, and open space land uses. Historically, the area surrounding the Project site had industrial land uses including oil and gas production. A review of the State Water Resources Control Board (SWRCB) GeoTracker (SWRCB, 2025) and California Department of Toxic Substance Control (DTSC) EnviroStor databases (DTSC, 2025) revealed there are nine GeoTracker and no EnviroStor listed sites within a 0.5-mile radius of the proposed Project site. Of the Geotracker sites, one is an open case/inactive status with known or potential environmental contamination and eight are completed case/closed status sites (SWRCB, 2025).

The GeoTracker listings include five Leaking Underground Storage Tank (LUST) cleanup sites and four Cleanup Program sites. All five of the LUST sites and three of the Cleanup Program sites are completed and case closed. The one open case, Sandpiper Golf Trust (T10000021104), has an inactive status and is located 2,500 feet southwest of the proposed Project site. The potential contaminants of concern include benzene, ethylbenzene, naphthalene, polynuclear aromatic hydrocarbons (PAHs), toluene, total

petroleum hydrocarbons (TPH), and xylene. The potential media of concern are soil and groundwater uses other than drinking water (SWRCB, 2025). However, this cleanup site is located downgradient of the proposed Project, and therefore does not pose a significant contamination hazard to the Project site.

There is one closed LUST site in the project vicinity. The Southern California Edison (T0608300688) site is located at 30 Las Armas Road at the current Ellwood Generating Station, adjacent to the western boundary of the proposed Project parcel. The potential contaminant of concern was gasoline, and the potential media of concern was aquifer used for drinking water supply (SWRCB, 2025). The case was closed in 1995 upon completion of a site investigation and remedial action for the underground storage tank. While approximately 55 cubic yards of contaminated soil was left-in-place beneath the concrete foundation and pavement, eight years of groundwater monitoring showed that groundwater was never impacted, and the impacted soil is located 35 feet above the groundwater table (Santa Barbara County, 1995). Therefore, the LUST site does not pose a significant contamination hazard to the proposed Project.

The proposed Project is not located at or near sites identified on a list of hazardous materials waste and substances sites pursuant to Government Code Section 65962.5, including the Cortese List (DTSC, 2025).

#### **5.9.1.5. Schools**

Ellwood Elementary School (7686 Hollister Avenue) is the only school located within 0.25 miles of the proposed Project. There are no preschools or daycare facilities located within 0.25 miles.

#### **5.9.1.6. Airports and Airstrips**

The Santa Barbara Municipal Airport (SBA) is located approximately 3.5 miles east of the proposed Project site. The site is within the Airport Influence Area, which is “the area in which current or future airport-related noise, overflight, safety, or airspace protection factors may significantly affect land uses or necessitate restrictions on those uses” (SBCAG, 2023, p. 4-3).

A review of the Santa Barbara Airport Land Use Compatibility Plan (LUCP) indicates that the Project site is not located in an existing or future noise exposure range (Community Noise Equivalent Level of 60 to 65 decibels [dB], 65 to 70 dB, 70 to 75 dB, or above 75 dB) (SBCAG, 2023 – Figure 4-1). Federal Aviation Regulations (FAR) Part 77, *Objects Affecting Navigable Airspace*, establishes imaginary surfaces for airports and runways as a means to identify objects that are obstructions to air navigation. Each surface is defined as a slope ratio or at a certain altitude above the airport elevation. The Project site is located between the 311.4 to 361.4 feet above Mean Sea Level FAR Part 77 Surface zone of maximum structure height (SBCAG, 2023 – Figure 4-3). The Project site is not located in an identified Runway Protection Zone (SBCAG, 2023 – Figure 4-2), but it is located in an overflight notification area – meaning developers of certain land uses may be required to obtain documentation acknowledging notification of overflight (SBCAG, 2023, p. 4-3).

#### **5.9.1.7. Wildfire Hazards**

The California Department of Forestry and Fire Protection (CAL FIRE) identifies, and maps areas of significant fire hazards based on fuels, terrain, and other relevant factors. The maps identify this information as a series of Fire Hazard Severity Zones (FHSZ), which are progressively ranked in severity as un-zoned, moderate, high, and very high. Depending on location, wildland fire protection in California is the responsibility of either the state, local, or federal government. State Responsibility Areas (SRAs) includes those areas where the financial responsibility of preventing and suppressing fires falls primarily on the State. Local Responsibility Areas (LRAs) include incorporated cities, unincorporated county areas, cultivated agriculture lands, and portions of the desert. LRA FHSZ are mapped as either Very High Fire Hazard Severity Zones (VHFHSZ) or as Non-VHFHSZs. LRA fire protection is typically provided by city fire departments, fire protection districts, counties, and by CAL FIRE under contract to local governments (CAL FIRE,

2024). Federal Responsibility Areas (FRA) are those located on federal lands not otherwise included in SRAs and LRAs.

The proposed Project site is not located in a State Responsibility Area (SRA) or Local Responsibility Area (LRA) FHSZ in the CAL FIRE wildland fire hazard maps (CAL FIRE, 2025), primarily due to its urban conditions, flat terrain, and low fuel load. The Project site is serviced by the Santa Barbara County Fire Department. For more information on wildfire hazards, see Section 5.20 Wildfire.

#### 5.9.1.8. Electromagnetic Fields and Induced Currents

**Electromagnetic Fields (EMF).** Electric voltage and electric current from transmission lines create electromagnetic fields (EMF). Possible health effects associated with exposure to EMF have been the subject of scientific investigation since the 1970s, and there continues to be public concern about the health effects of EMF exposure. However, EMF is not addressed here as an environmental impact under CEQA. The California Public Utilities Commission has repeatedly recognized that EMF is not an environmental impact to be analyzed in the context of CEQA because (1) there is no agreement among scientists that EMF does create a potential health risk, and (2) there are no defined or adopted CEQA standards for defining health risks from EMF.

**Induced Currents.** Electric currents can be induced in metallic objects located within the electric fields created by power lines. An electric current can flow when an object has an induced charge and a path to ground is present. The amount of induced current that can flow is important to evaluate from a safety perspective because of the potential for electrical shocks to people and the possibility of electric arcs that could form across small gaps between conductive surfaces. These arcs can have the secondary effect of igniting flammable materials that may be in the vicinity of the arc. In addition, induced currents are evaluated for their potential to lead to corrosion of metallic objects (such as buried pipelines) from the discharge of the induced current to ground.

From a safety perspective, the National Electrical Safety Code (NESC) specifies that transmission lines be designed to limit short circuit current from vehicles or large objects near the line to no more than 5 milliamperes (mA). The NESC also addresses shock hazards to the public by providing guidelines on minimum clearances to be maintained for practical safeguarding of persons during the installation, operation, or maintenance of overhead transmission lines and their associated equipment.

Common concerns are regarding electrical interference with existing and future development in the area. The CEQA Guidelines do not provide significance criteria for evaluating impacts from corona or induced current effects. Corona and induced current from high voltage power lines can cause environmental impacts through:

- Audible noise
- Radio and television interference
- Computer interference
- Disturbance of cardiac pacemakers
- Ignition of flammable materials
- Corrosion of buried metallic objects

Although corona can generate high frequency energy that may interfere with broadcast signals or electronic equipment, this is generally not a problem for transmission or lower voltage power lines below 115 kV. Electric fields from power lines do not typically pose interference problems for electronic equipment in businesses or homes since the equipment is shielded by buildings and walls. The Institute of Electrical and Electronic Engineers (IEEE) has published a design guide (IEEE, 1971) that is used to limit conductor surface gradients so as to avoid corona levels that would cause electronic interference. Corona or gap discharges related to high frequency radio and television interference impacts are dependent upon several factors, including the strength of broadcast signals, and are anticipated to be very localized if they occur. Individual sources of adverse radio/television interference impacts can be located and corrected on the power lines. Conversely, magnetic field interference with electronic equipment such as computer monitors can be

corrected through the use of software, shielding or changes at the monitor location. As a result, impacts from corona, radio/television interference, and magnetic field interference would be less than significant.

Induced currents and voltages on conducting objects near the proposed 66 kV power line would not pose a threat in the environment if the conducting objects are properly grounded. Project construction and operation would be done in accordance with the City's existing inspection and maintenance program and safety practices. Likewise, induced currents would not increase the risk of fuel ignition in the area.

The electric fields associated with high voltage transmission lines may be of sufficient magnitude to impact operation of a few older model pacemakers resulting in them reverting to an asynchronous pacing (IEEE, 1979). However, due to the voltage level for this Project, 66 kV, this is not a concern.

### 5.9.2. Regulatory Background

Hazardous substances are defined by federal and State regulations that aim to protect public health and the environment. Hazardous materials have certain chemical, physical, or infectious properties that cause them to be considered hazardous. Hazardous substances are defined in the federal Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 101(14), and also in the California Code of Regulations (CCR), Title 22, Chapter 11, Article 2, Section 66261, which provides the following definition:

*A hazardous material is a substance or combination of substances which, because of its quantity, concentration, or physical, chemical or infectious characteristics, may either (1) cause, or significantly contribute to, an increase in mortality or an increase in serious irreversible, or incapacitating reversible, illness; or (2) pose a substantial present or potential hazard to human health or environment when improperly treated, stored, transported or disposed of or otherwise managed.*

For this analysis, soil that is excavated from a site containing hazardous materials would be considered to be a hazardous waste if it exceeded specific CCR Title 22 criteria or criteria defined in CERCLA or other relevant federal regulations. Remediation (cleanup and safe removal/disposal) of hazardous wastes found at a site is required if excavation of these materials occurs; it may also be required if certain other activities occur. Even if soils or groundwater at a contaminated site do not have the characteristics required to be defined as hazardous wastes, remediation of the site may be required by regulatory agencies subject to jurisdictional authority. Cleanup requirements are determined on a case-by-case basis by the agency taking lead jurisdiction.

#### Federal

**Toxic Substances Control Act.** The federal Toxic Substances Control Act (1976) and the Resource Conservation and Recovery Act of 1976 (RCRA) established a program administered by the U.S. Environmental Protection Agency (EPA) for the regulation of the generation, transportation, treatment, storage, and disposal of hazardous waste. RCRA was amended in 1984 by the Hazardous and Solid Waste Act (HSWA), which affirmed and extended the "cradle to grave" system of regulating hazardous wastes. The use of certain techniques for the disposal of some hazardous wastes was specifically prohibited by HSWA.

■ **Resource Conservation and Recovery Act.** The federal Toxic Substances Control Act (1976) and the Resource Conservation and Recovery Act of 1976 (RCRA) established a program administered by the United States Environmental Protection Agency (U.S. EPA) for the regulation of the generation, transportation, treatment, storage, and disposal of hazardous waste. RCRA was amended in 1984 by the Hazardous and Solid Waste Act, which affirmed and extended the "cradle to grave" system of regulating hazardous wastes. The use of certain techniques for the disposal of some hazardous wastes was specifically prohibited by the Hazardous and Solid Waste Act.

■ **Comprehensive Environmental Response, Compensation, and Liability Act.** Congress enacted the federal CERCLA, including the Superfund program, on December 11, 1980. This law provided broad federal authority to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment. CERCLA established requirements concerning closed and abandoned hazardous waste sites; provided for liability of persons responsible for releases of hazardous waste at these sites; and established a trust fund to provide for cleanup when no responsible party could be identified. CERCLA also enabled the revision of the National Contingency Plan. The National Contingency Plan provided the guidelines and procedures needed to respond to releases and threatened releases of hazardous substances, pollutants, and/or contaminants. The National Contingency Plan also established the National Priorities List. CERCLA was amended by the Superfund Amendments and Reauthorization Act on October 17, 1986.

**Clean Water Act.** The Clean Water Act (CWA) is the principal federal statute protecting navigable waters and adjoining shorelines from pollution. The law was enacted with the intent of restoring and maintaining the chemical, physical, and biological integrity of the waters of the United States. Since its enactment, the CWA has formed the foundation for regulations detailing specific requirements for pollution prevention and response measures. The U.S. EPA implements provisions of the CWA through a variety of regulations, including the NCP, as described above, and the Oil Pollution and Prevention Regulations. Implementation of the CWA is the responsibility of each state.

As part of the Clean Water Act, the U.S. EPA oversees and enforces the Oil Pollution Prevention regulation (Title 40 CFR Part 112), which is often referred to as the “SPCC rule” because the regulations describe the requirements for facilities to prepare, amend, and implement Spill Prevention, Control, and Countermeasure (SPCC) Plans. A facility is subject to SPCC regulations if the total above ground oil storage capacity exceeds 1,320 gallons, or the underground oil storage capacity exceeds 42,000 gallons, and if, due to its location, the facility could reasonably be expected to discharge oil into or upon the “navigable waters” of the United States. The rule specifies that proactive, not passive, measures be used to respond to oil discharges.

**National Pollutant Discharge Elimination System.** The National Pollutant Discharge Elimination System (NPDES) permit program, created in 1972 by the CWA, helps address water pollution by regulating point sources that discharge pollutants to waters of the United States. The permit provides two levels of control: technology-based limits and water quality-based limits (if technology-based limits are not sufficient to provide protection of the water body). Under the CWA, U.S. EPA may authorize state, tribal, and territorial governments to administer the NPDES permit program, enabling them to perform many of the permitting, administrative, and enforcement aspects of the NPDES program. In states authorized to implement CWA programs, U.S. EPA retains oversight responsibilities. Within the State of California, the SWRCB issues both general permits and individual permits under the NPDES permit program.

**Federal Aviation Administration.** Title 14, Part 77.9 of the Code of Federal Regulations requires Federal Aviation Administration (FAA) notification for any construction or alteration of navigable airspace exceeding 200 feet above ground level (AGL). It also requires notification for construction or alterations within 20,000 feet of an airport with a runway more than 3,200 feet in length if the height of the construction or alteration exceeds a slope of 100 to 1 extending outward and upward from the nearest point of the nearest runway of the airport. If a project’s height exceeds 200 feet or exceeds the 100:1 surface, the Project applicant must submit a copy of FAA Form 7460-1, Notice of Proposed Construction or Alteration, to the FAA.

## State

**The California Fire Code.** Chapter 12 of the California Fire Code (CFC) provides provisions related to the installation, operation, and maintenance of energy systems used for generating or storing energy to

safeguard the public health, safety and general welfare from the hazards of fire, explosion or dangerous conditions in new and existing buildings, structures and premises, and to provide safety and assistance to fire fighters and emergency responders during emergency operations. Section 1207 of the 2022 CFC provides requirements for Electrical Energy Storage Systems (ESS) and provides information on permits, construction, hazard mitigation, and operational requirements.

**California Environmental Protection Agency.** The California Environmental Protection Agency (Cal/EPA) was created in 1991, which unified California's environmental authority in a single cabinet-level agency and brought the Air Resources Board (ARB), State Water Resources Control Board (SWRCB), Regional Water Quality Control Boards (RWQCBs), Integrated Waste Management Board (IWMB), DTSC, Office of Environmental Health Hazard Assessment (OEHHA), and Department of Pesticide Regulation (DPR) under one agency. These agencies were placed within the Cal/EPA "umbrella" for the protection of human health and the environment and to ensure the coordinated deployment of State resources. Their mission is to restore, protect and enhance the environment, to ensure public health, environmental quality, and economic vitality.

**California Hazardous Waste Control Law.** The California Hazardous Waste Control Law (HWCL) is administered by Cal/EPA to regulate hazardous wastes. While the HWCL is generally more stringent than RCRA, until the EPA approves the California program, both the State and federal laws apply in California. The HWCL lists 791 chemicals and about 300 common materials that may be hazardous; establishes criteria for identifying, packaging and labeling hazardous wastes; prescribes management controls; establishes permit requirements for treatment, storage, disposal and transportation; and identifies some wastes that cannot be disposed of in landfills.

**California Department of Toxic Substance Control.** Department of Toxic Substance Control (DTSC) is a department of Cal/EPA and is the primary agency in California that regulates hazardous waste, cleans-up existing contamination, and looks for ways to reduce the hazardous waste produced in California. DTSC regulates hazardous waste in California primarily under the authority of RCRA and the California Health and Safety Code. Other laws that affect hazardous waste are specific to handling, storage, transportation, disposal, treatment, reduction, cleanup, and emergency planning.

**California Department of Industrial Relations, Division of Occupational Safety and Health Administration.** The California Occupational Safety and Health Administration (Cal/OSHA) is the primary agency responsible for worker safety in the handling and use of chemicals in the workplace. Cal/OSHA standards are generally more stringent than federal regulations. The employer is required to monitor worker exposure to listed hazardous substances and notify workers of exposure (8 CCR Sections 337-340). The regulations specify requirements for employee training, availability of safety equipment, accident-prevention programs, and hazardous substance exposure warnings.

**California Fire Plan.** The Strategic California Fire Plan was finalized in June 2010 and directs each California Department of Forestry and Fire Protection (CAL FIRE) Unit to prepare a locally specific Fire Management Plan. In compliance with the California Fire Plan, individual CAL FIRE units are required to develop Fire Management Plans for their areas of responsibility. These documents assess the fire situation within each of CAL FIRE's 21 units and six contract counties. The plans include stakeholder contributions and priorities and identify strategic areas for pre-fire planning and fuel treatment, as defined by the people who live and work with the local fire problem. The plans are required to be updated annually.

## Local

**Santa Barbara County Environmental Health Services (EHS).** The EHS department manages hazardous materials and ensures public safety to environmental hazards in Santa Barbara County. EHS is certified by the California Environmental Protection Agency (CalEPA) to act as a Certified Unified Program Agency (CUPA) to oversee hazardous materials and waste programs, including Hazardous Materials Business

Plans, California Accidental Release Prevention Program, Underground Storage Tank Program, Aboveground Petroleum Storage Act, Hazardous Waste Generator Program, and the Tiered Permitting Program. EHS also oversees site mitigation and cleanup through the Leaking Underground Fuel Tank (LUFT) Program and the Site Mitigation Unit. EHS coordinates with emergency services to respond to hazardous materials incidents, and ensure that facilities are prepared for emergencies through inspections, training, and enforcement of safety regulations (Santa Barbara County, 2025).

**City of Goleta Emergency Operations Plan.** The City of Goleta adopted an Emergency Operations Plan in 2023, organized by the specific hazards the city faces, including earthquake, wildfire, hazardous materials, flooding, hydrogen sulfide, epidemic, and pandemic. The plan provides a legal framework for the management of emergencies and guidance for the conduct of business in the City's Emergency Operations Center (EOC), including collaboration and coordination between different responsible agencies. The plan identifies the local risk factors, potential impacts, and emergency operations response for hazardous materials incidents (City of Goleta, 2023).

**City of Goleta Community Wildfire Protection Plan.** The Community Wildfire Protection Plan was developed under the Healthy Forests Restoration Act (HFRA) of 2003, and aims to reduce wildfire risk in the Wildland-Urban Interface. The plan focuses on hazardous fuel reduction, community preparedness, and structure protection by identifying high-risk fire areas, prioritizing fuel treatment projects, enhancing emergency response capabilities, community education on preparedness, and protecting critical infrastructure and natural resources (City of Goleta, 2012).

**City of Goleta General Plan.** The objectives of the City's General Plan public safety policies in regard to hazards and hazardous materials are to protect the community from any unreasonable risks associated with seismicity, ground shaking, tsunami, soil and slope stability, flood, wildfire, hazardous materials and facilities, oil and gas industry hazards, and airport-related hazards. The Safety Element aims to attain a high level of emergency preparedness to limit damage and risks to public safety from natural and industrial hazards. The following policies in the General Plan relate to the proposed Project (City of Goleta, 2006):

- **Policy SE 7.1 Fire Prevention and Response Measures for New Development.** New development and redevelopment projects shall be designed and constructed in accordance with National Fire Protection Association standards to minimize fire hazards. Special attention will be given to fuel management and improved access in areas with higher fire risk, with access or water supply deficiencies, or beyond a 5-minute response time (Safety Element, 5-22).
- **Policy SE 7.3 Identification of Fire Hazard Areas.** The Santa Barbara County Fire Department should identify high-value and high-risk areas, including urban/wildlife interface areas, and develop mitigation efforts to reduce the threat of fire (Safety Element, 5-22).
- **Policy SE 9.1 Safety Zone Regulations.** The City will maintain and enforce through appropriate zoning measures the airport Safety Zone regulations, including use limitations, pursuant to the Santa Barbara Airport Land Use Compatibility Plan (ALUCP). The City of Goleta shall consult with the ALUC when required by the ALUCP. The City shall also require, as a condition of approval of development applications, dedication of avigation easements where required by the ALUCP (Safety Element, p. 5-26).
- **Policy 9.8 Limitations on Hazardous Facilities.** Development that includes new hazardous installations or materials such as, but not limited to, oil or gas storage and explosive or highly flammable materials shall conform to the use limitations included in the ALUCP (Safety Element, p. 5-27).
- **Policy SE 10.1 Identification of Hazardous Materials Facilities.** The City shall work with Santa Barbara County Fire Department's Hazardous Materials Unit to maintain up-to-date lists and maps of facilities in Goleta that involve the storage, use, and/or transport of hazardous materials (Safety Element, p. 5-27).

- **Policy SE 10.2 Compliance with Law.** The storage, handling, and disposal of any hazardous material shall be done only in strict compliance with applicable City, state, and federal law (Safety Element, p. 5-27).
- **Policy SE 10.4 Prohibition on New Facilities Posing Unacceptable Risks.** The City shall not allow new hazardous facilities or expanded hazardous facilities that would expose existing residential or commercial development to unacceptable risk. New or expanded hazardous facilities in proximity to existing residential and commercial development shall incorporate appropriate mitigation measures to minimize potential risks and exposure (Safety Element, p. 5-27).
- **Policy SE 10.7 Identification, Transport, and Disposition of Potentially Contaminated Soil.** The City shall require a Soil Management Plan and a project-specific Health and Safety Plan for all new development and redevelopment within areas containing potentially contaminated soil (Safety Element, p. 5-28).
- **Policy SE 11.3 Periodic Update of Multi-Hazard Emergency Response Plan.** The City shall prepare and maintain a Multi-Hazard Emergency Response Plan. It should periodically review studies assessing the impacts of earthquakes, floods, and other emergencies and revise emergency response measures and procedures as appropriate (Safety Element, 5-29).

### 5.9.3. Environmental Impacts and Mitigation Measures

#### Thresholds of Significance

A significant impact with regards to hazards and hazardous materials would be expected to occur if the Project resulted in any of the impacts in the CEQA Appendix G checklist. In addition, the City's *Environmental Thresholds and Guidelines Manual* addresses public safety impacts resulting from involuntary exposures to hazardous materials. These thresholds focus on activities that include the installation or modification of facilities that handle hazardous materials, transportation of hazardous materials, or non-hazardous land uses in proximity to hazardous facilities.

The City has adopted CEQA thresholds that are used to assist in classifying the significance of impacts to public safety. The thresholds are based on quantitative measures of risk. If a proposed project has the potential to expose the public to toxic or flammable pollutants, then a risk assessment must be undertaken. The thresholds are applicable to a number of industry types including the "use" of specified quantities of regulated substances pursuant to Title 19 of the California Code of Regulations (the CalARP regulations), or materials that could vaporize or evaporate quickly upon release and could cause risk to the public. Although the proposed project does not "use" any of the substances on the Title 19 list, a number of toxic and flammable substances on the Title 19 list could be emitted if the proposed energy storage batteries were to experience a malfunction. Therefore, if a battery malfunction could cause the release of specified pollutants and the release could impact the public, a detailed risk analysis is required. A risk analysis was prepared for this Project, and is included as Appendix H.

#### Impact Analysis

**(a) Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?**

DURING CONSTRUCTION AND DECOMMISSIONING - *LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED.* The use of hazardous materials during Project construction would be minimal. Hazardous materials may include gasoline, diesel fuel, hydraulic oils, equipment coolants, and any generated wastes that may include these materials. These materials are considered hazardous because they are flammable and/or contain toxic compounds, such as volatile organic compounds and heavy metals. Wastes considered hazardous by the State of California would be transported and disposed of according to applicable federal, State, and local regulations, as described above under applicable Regulations. Fueling and routine maintenance of

construction equipment and vehicles would be performed off site to the greatest extent feasible. However, minor spills or releases of hazardous materials could occur due to upset or improper handling and/or storage practices during construction activities. Decommissioning activities would be similar to construction activities and would have similar impacts.

Therefore, implementation of mitigation measure MM HM-1 (Hazardous Substance Control and Emergency Response) would reduce potential impacts associated with hazardous material transport, use, and disposal during construction and decommissioning, which would ensure that these Project activities would not create a significant hazard to the public or the environment.

### Mitigation Measure for Hazards and Hazardous Materials

**MM HM-1 Hazardous Substance Control and Emergency Response.** Scale Microgrids, LLC shall implement its Emergency Response Plan and Site Safety Plan procedures as needed. These procedures identify methods and techniques to minimize the exposure of the public and site workers to potentially hazardous materials during all phases of Project construction, operation, and decommissioning. They address worker training appropriate to the site worker's role in hazardous substance control and emergency response. The procedures also require implementing appropriate control methods and approved containment and spill-control practices for construction and materials stored on site. If it is necessary to store chemicals on site, they shall be managed in accordance with all applicable regulations. Material safety data sheets shall be maintained and kept available on site, as applicable.

No known soil contamination was identified within the Project site. However, historic groundwater contamination has occurred at upgradient sites (SWRCB, 2025). In the event that soils, or groundwater suspected of being contaminated (on the basis of visual, olfactory, or other evidence) are removed/encountered during site grading or excavation activities or dewatering activities, the excavated soil and/or extracted groundwater shall be tested and, if contaminated above hazardous waste levels, shall be contained and either treated or disposed of at a licensed waste facility. The presence of known or suspected contaminated soil or groundwater shall require testing and investigation procedures to be supervised by a qualified person, as appropriate, to meet state and federal regulations.

All hazardous materials and hazardous wastes shall be handled, stored, and disposed of in accordance with all applicable regulations, by personnel qualified to handle hazardous materials. The hazardous substance control and emergency response procedures include, but are not limited to, the following:

- Proper disposal of potentially contaminated soils.
- Stopping work at that location and contacting the Santa Barbara Fire Department Hazardous Materials Response Team immediately if visual contamination or chemical odors are detected. Work will be resumed at this location after any necessary consultation and approval by the Hazardous Materials Division.
- Develop an Emergency Operations Plan with emergency response and reporting procedures to address hazardous material spills. The Emergency Operations Plan shall also be developed in compliance with sections of NFPA 855, including:
  - procedures for safe shutdown, de-energizing and isolation of equipment under emergency situations;

- procedures for inspection and testing of alarms, interlocks, detection systems and controls including recordkeeping;
- procedures to be followed in response to notification from the storage systems that could signify dangerous situations, including shutting down equipment and notification to the local fire department; and procedures and schedules for conducting drills of the procedures.
- Develop a Site Safety Plan prior to commencement of construction that identifies and summarizes the design safety features and equipment onsite, including the following:
  - Fire prevention, detection, and suppression features, including:
    - (i) a description of the Battery Management System (BMS) and the monitoring of alarms and battery cell conditions and thresholds for alarms. Monitoring and detection systems shall alarm locally and both visually and audibly, shall be monitored by a 24-hour system and shall notify the local fire department. Indication shall be provided to responders indicating which Megapack is experiencing issues;
    - (ii) flame and gas detection systems, including the location of detection, type of detection and the monitoring of alarms (NFPA 855 Section 4.8);
    - (iii) availability of water for firefighting and compliance with fire department requirements for flow and availability (NFPA 855 Section 4.9).
  - Special safety measures to be implemented for battery installation and replacement, including:
    - (i) all batteries shall be discharged to below 30 percent state of charge (SOC) during the construction/installation phases.
    - (ii) any replacement or maintenance of batteries requiring the use of heavy construction equipment, such as cranes or forklifts, shall be conducted only on batteries discharged to below 30 percent SOC and nearby batteries that could be affected shall also be discharged to below 30 percent SOC;
    - (iii) disposal of replaced (discarded) equipment.
- Provide a copy of an NFPA 855 compliance audit report to verify that the system is designed and built to comply with the NFPA 855 requirements prior to system startup;
- Provide documentation indicating that batteries are listed in accordance with UL 1973 and listed in accordance with UL 9540;
- Ensure that Megapack batteries are located at least 10 feet from lot lines as per NFPA 855;
- Vehicle impact protections or equivalent that meets the standard outlined in NFPA 855 section 4.7.5.3 shall be installed to reduce the potential for vehicle impacts (as per NFPA 855 section 4.7.5.2);
- Emergency response procedures, including notification of local responders;
- Personnel safety training;
- Fire suppression and other safety features/equipment located at the site;

- Site-specific buffers for construction vehicles and equipment located near sensitive resources;
- Type and placement of warning signs;
- Emergency ingress and egress routes;
- Provisions and timing for updating the Plan to incorporate new or changed requirements;
- Control of vegetation;
- Security of installations;
- Access roads design;
- Signage; and
- Remediation measures including authorized service personnel and fire mitigation personnel.

DURING OPERATION AND MAINTENANCE - *LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED*. Other than substances associated with motor vehicles that would be used during inspections (e.g., gas, diesel, oil, or hydraulic fluid), no hazardous materials are associated with routine maintenance of the Project. There are no hazards or hazardous materials associated with the normal operation of a lithium iron phosphate (LFP) BESS. In the event of BESS malfunction, hazards and hazardous materials could include exposure to toxic air emissions from off-gassing and combustion, flammable vapors and thermal radiation from a BESS fire or thermal runaway, and contamination of water used for fire suppression. Therefore, implementation of mitigation measure MM HM-1 (Hazardous Substance Control and Emergency Response) would reduce potential impacts associated with hazardous material transport, use, and disposal during Project operations to less than significant in the event of BESS malfunction.

**(b) Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?**

DURING CONSTRUCTION AND DECOMMISSIONING - *LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED*. Accidental spills of motor vehicles fluids associated with construction vehicles could occur during construction of the proposed Project as discussed in Item (a) above. The minimal amounts of hazardous materials anticipated for use in the Project coupled with implementation of mitigation measure MM HM-1 (Hazardous Substance Control and Emergency Response) would reduce potential impacts by requiring the development and implementation of hazardous substance control and health and safety measures. Decommissioning activities would be similar to construction activities and would have similar impacts.

DURING OPERATION AND MAINTENANCE - *LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED*. As described in Item (a) above, no hazardous materials are associated with the routine maintenance of the Project, apart from substances associated with motor vehicles that would be used during inspections (e.g., gas, diesel, oil, or hydraulic fluid). There are no hazards or hazardous materials associated with the normal operation of an LFP BESS, unless there is an emergency that causes damage to the BESS units. Each lithium battery cell is a sealed unit, and thus under normal conditions, release of materials within the battery cell should not occur. According to the BESS manufacturer, mechanical, thermal, or electrical damage to the BESS could result in a number of hazardous conditions, including leaked battery pack coolant, leaked refrigerant, leaked cell electrolyte, thermal runaway and venting, and fire (Tesla, 2022).

The Project would include operation of a BESS designed, constructed, operated, and maintained in accordance with applicable industry best practices and regulatory requirements, including fire safety standards, as discussed in Project Description Section 4.11.1, Fire Safety. However, due to the potential for accidental spills or release of hazardous materials, implementation of MM HM-1 (Hazardous Substance

Control and Emergency Response) is recommended, which would reduce potential impacts by requiring the development of an Emergency Operations Plan and Site Safety Plan, prepared in compliance with NFPA 855, which would identify methods and techniques to minimize the exposure of the public and site workers to potentially hazardous materials during all phases of Project construction, operation, and decommissioning.

The BESS would comply with the current 2022 California Fire Code (CFC), which governs the code requirements to minimize the risk of fire and life safety hazards specific to battery energy storage systems used for load shedding, load sharing, and other grid services. For example, CFC Section 1207 contains specific requirements for BESS installation, fire suppression systems, smoke and fire detection, explosion control, hazard mitigation, and technology-specific protections (tailored safety requirements based on the type of battery chemistry used in the BESS).

The Tesla Megapack 2 XL battery system is designed to meet National Fire Protection Association (NFPA) 855 and Underwriters Laboratories (UL) 9540A industry safety standards. The NFPA 855 sets key safety standards and requirements for a BESS, including hazard mitigation analysis, fire safety provisions (fire suppression, explosion control, gas detection and ventilation, thermal runaway testing), technology-specific guidelines (tailored guidelines based on the type of battery chemistry used in the BESS), installation and commissioning, and operation and maintenance. UL 9540A is a test method, required under NFPA 855, intended to document the fire characteristics associated with thermal event or fire and would confirm that the system would self-extinguish without active fire-fighting measures. The BESS would be designed, such that, during a fire event, the results of the UL 9540A test would show that any internal fire is contained within the enclosure and not spread to the other parts of the facility. The results of this test are used to inform facility safety system design and emergency response plans which would be shared with first responders. Implementation of mitigation measure HM-1 (Hazardous Substance Control and Emergency Response) would ensure that the Project meets standard safety requirements, and that there are plans in place in the event of an emergency to protect the public, reducing impacts to less than significant.

The following discussion outlines the results of the hazards analysis and quantitative risk analysis, which were prepared for the Project to analyze impacts related to worst-case scenarios.

**Hazards Analysis.** ERM conducted a hazards analysis for the proposed Project to evaluate the impacts of the off gassing from toxic and flammable emissions in the event of a BESS fire or thermal runaway event (see Appendix H). The hazards analysis applied the screening methodology developed by the Santa Barbara County Air Pollution Control District to assess potential acute health risks from toxic emissions. Additionally, comprehensive consequence modeling was conducted using PHAST 8.7 software, which simulated vapor dispersion, fire, and explosion scenarios in order to determine potential exposure zones and hazard levels under various site-specific conditions.

ERM's hazards analysis modeling indicated the public health impacts from toxic pollutants associated with the reasonable worst-case multicell malfunction would be less than significant for receptors located near the site (ERM, 2025 – Appendix H [Hazards Analysis], p. 18). Moreover, thermal impacts including flammable vapors and thermal radiation would not reach areas outside the site that would be continuously populated (ERM, 2025 – Appendix H [Hazards Analysis], p. 23). Water used for fire suppression could enter the storm drain system, but would not have contaminants that would exceed those encountered at an industrial, commercial or residential fire situation and is therefore considered to be within the range of normal fire water runoff from response situations (ERM, 2025 – Appendix H [Hazards Analysis], p. 27).

**Quantitative Risk Analysis.** In addition to the hazards analysis, ERM conducted a Quantitative Risk Analysis for the proposed Project. The QRA evaluated the likelihood and consequences of public exposure to flammable and toxic materials by plotting potential incident frequencies against cumulative fatalities or injuries on a Frequency-Number (FN) curve, which was then compared to County-defined risk thresh-

olds. These thresholds categorize risk into green (acceptable), amber (as low as reasonably practicable), and red (intolerable), guiding whether further mitigation is needed before project approval.

ERM's risk analysis modeling indicated that the risk levels would be "as low as reasonably practicable," where the risk of realizing a fatality would be less than 1 in 1,000,000 years, and the risk of realizing a serious injury would be less than 1 in 100,000 years. ERM concluded that, under the worst-case scenario where an entire Megapack fails and there are no emergency responders to mitigate the fire and warn the public, the impacts of a serious fatality or injury would be less than significant (ERM, 2025 – Appendix H [Hazards Analysis], p. 38).

Compliance with applicable regulations, guidelines, and standards, and implementation of MM HM-1 (Hazardous Substance Control and Emergency Response) would reduce the potential for fire related damage to the BESS that may release hazardous materials from damaged batteries to less than significant. Moreover, the hazards analysis and risk modeling showed that even a worst-case scenario (such as airplane impact, run-away vehicle impact, terrorist incident, or nearby construction equipment collapse causing impact) causing failure of one or more BESS modules would result in less than significant impacts involving the release of hazardous materials into the environment. Therefore, the impact due to Project operations would be less than significant with implementation of mitigation.

### **Mitigation Measure for Hazards and Hazardous Materials**

**MM HM-1 Hazardous Substance Control and Emergency Response** [see full text under item (a) above]

**(c) Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?**

*LESS THAN SIGNIFICANT.* The proposed Project site is located within 0.25 mile of Ellwood Elementary School. Impacts related to hazardous air emissions are addressed in Section 5.3 (Air Quality); this section addresses other hazardous substances or materials and their potential impact at schools.

The proposed Project would not create hazardous air emissions or handle extremely hazardous substances within one-fourth mile of a school. Therefore, there would be no impact related to California Public Resources Code (PRC) § 21151.4.

Small amounts of hazardous materials would be used and may be stored during Project construction, operation, and decommissioning, which would be handled per all applicable regulations, preventing emissions of hazardous materials. No acutely hazardous materials are anticipated to be used during Project construction or operation. Therefore, there would be a less than significant impact to schools related to hazardous materials use.

**(d) Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment?**

*DURING CONSTRUCTION AND DECOMMISSIONING- LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED.* The proposed Project site is not located on or adjacent to any active hazardous materials sites as identified pursuant to Government Code Section 65962.5; therefore, no significant hazard to the public or the environment would be created. There is one open Cleanup Program case with inactive status located approximately 2,500 feet southwest from the proposed Project site at the Sandpiper Golf Course. However, this cleanup site is downgradient of the proposed Project, and therefore does not pose a significant contamination hazard. Decommissioning activities would be similar to construction activities and would have similar impacts.

There is one closed LUST site in the project vicinity. The Southern California Edison (T0608300688) site is located at 30 Las Armas Road at the Ellwood Generating Station, adjacent to the western boundary of the proposed Project parcel. The potential contaminant of concern was gasoline, and the potential media of

concern was aquifer used for drinking water supply (SWRCB, 2025). The case was closed in 1995 upon completion of a site investigation and remedial action for the underground storage tank. While approximately 55 cubic yards of contaminated soil was left-in-place beneath the concrete foundation and pavement, eight years of groundwater monitoring showed that groundwater was never impacted, and the impacted soil is located 35 feet above the groundwater table (Santa Barbara County, 1995). Thus, while this LUST site does not pose a significant contamination hazard to the proposed Project, it is possible that unknown soil or groundwater contamination could be encountered during Project grading and excavation activities.

Contaminated soil or groundwater encountered during construction is considered to be hazardous by the State of California. It would be handled, stored, transported and disposed of according to applicable federal, State, and local regulations, as described above under applicable Regulations. Implementation of mitigation measure MM HM-1 (Hazardous Substance Control and Emergency Response) would reduce potential impacts associated with encountering unknown hazardous soil or groundwater ensuring that Project construction would not create a significant hazard to the public or the environment through the encountering contaminated soil or groundwater at or near current and former hazardous materials sites.

**DURING OPERATION AND MAINTENANCE - NO IMPACT.** The Proposed Project would not use large quantities of hazardous materials or acutely hazardous materials and is therefore unlikely to be identified during operation on a list of active hazardous materials sites compiled pursuant to Government Code Section 65962.5; therefore, no significant hazard the public or the environment would be created.

### Mitigation Measure for Hazardous Materials Sites

**MM HM-1 Hazardous Substance Control and Emergency Response** [see full text under item (a) above]

**(e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?**

*LESS THAN SIGNIFICANT.* The proposed Project site is in an Airport Influence Area and is located approximately 3.5 miles west of the Santa Barbara Municipal Airport. The proposed Project site is not located in an existing or future noise exposure range, nor in an identified Runway Protection Zone (SBCAG, 2023 – Figures 4-1 and 4-2). The site is in an overflight notification area, and is located between 311.4 to 361.4 feet above Mean Sea Level FAR Part 77 Surface zone of maximum structure height (SBCAG, 2023 – Figure 4-3). The height of the BESS structures and gen tie line would not be tall enough to exceed the FAR Part 77 Surface zone of maximum structure height. Therefore, there would be a less than significant impact to aviation safety due to construction, operation, or decommissioning of the Project. The proposed Project does not include habitable structures and would be unstaffed except for periodic maintenance checks, and therefore result in no impacts related to excessive airport noise.

**(f) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?**

*DURING CONSTRUCTION AND DECOMMISSIONING - LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED.* Construction-related temporary short-term lane closures or disruptions on roads may be necessary during the 8-month construction period. The City of Goleta adopted an updated Emergency Operations Plan (EOP) in 2023. The plan provides a legal framework for the management of emergencies and guidance for the conduct of business in the City's Emergency Operations Center (EOC), including collaboration and coordination between different responsible agencies. The EOP establishes responsibilities and procedures for addressing potential emergencies related to disasters such as earthquakes, floods, fires, hazardous materials incidences, hydrogen sulfide, and epidemic and pandemic. The plan identifies the local risk factors, potential impacts, and emergency operations response for hazardous materials incidents (City of Goleta, 2023). The EOP conforms to the requirements of the National Incident Management System

(NIMS) mandated by the U.S. Department of Homeland Security. The Santa Clara EOP also builds on and coordinates with the State's Standardized Emergency Management System (SEMS) and the California State Emergency Plan.

The proposed Project would not interfere with operation of any emergency shelters and would not permanently close off or otherwise alter any existing streets, and therefore would not create any obstructions to potential evacuation routes that might be used in the event of an emergency.

During construction, any temporary lane closures would be coordinated with local agencies as specified in Transportation and Traffic Mitigation Measure T-1 (Construction Traffic Control Plan) (see Section 5.16, Traffic and Transportation). Additionally, any temporary road closures would follow applicable regulations and would not impede emergency response. Adherence to the City's EOP, coupled with implementation of mitigation measure MM T-1 during construction would ensure that the Project would not impair the implementation of or physically interfere with an adopted emergency response or evacuation plan; therefore, the impact that would occur related to emergency response during construction would be less than significant with mitigation. Decommissioning activities would be similar to construction activities and would have similar impacts.

*DURING OPERATION AND MAINTENANCE - NO IMPACT.* Long-term operations of the BESS would not require any lane closures for routine maintenance. Thus, BESS operations and maintenance would not impair the implementation of or physically interfere with an adopted emergency response or evacuation plan.

### **Mitigation Measure for Emergency Response**

**MM T-1 Construction Traffic Control Plan.** [see full text in Section 5.17, Transportation]

**(g) Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?**

*DURING CONSTRUCTION AND DECOMMISSIONING - LESS THAN SIGNIFICANT.* The BESS facility would be unstaffed and would not have any occupied facilities. The proposed Project site is not located in a FHSZ as shown on CAL FIRE wildland fire hazard maps (CAL FIRE, 2025).

Construction activities have the potential to be a fire ignition source. For example, sparks from welding or from metal striking metal or stone could ignite flammable materials such as packing cardboard or rags. To reduce the fire risk, fire suppression equipment (e.g., extinguishers) would be on site. The limited amount of flammable material on site during construction and the barren nature of the site mitigate against the spread of any accidental fire. Decommissioning activities would be similar to construction activities and would have similar impacts. Impacts from wildfire risk during construction and decommissioning would be less than significant and no mitigation is required.

*DURING OPERATION AND MAINTENANCE - LESS THAN SIGNIFICANT.* The proposed Project includes a 200-foot-long underground 66 kV generation-tie line between the BESS transformer pad at the western end of the BESS facility and the EGS substation, and no new offsite power poles or conductors would be needed for the interconnection. Undergrounding the gen-tie line would negate the risk of utility-sparked wildfire from tree-to-wire contact or from conductor-to-conductor contact.

At Project completion, the site would be surrounded by an eight-foot-high ornamental metal no-climb fence and would be unvegetated within the fenced site. The site is relatively level, and site grading would be minimal. The internal perimeter road would be surfaced with permeable gravel or other permeable all-weather material, and the remainder of the ground surface within the BESS operational area would be covered with gravel. These conditions reduce fire risk to nearby properties due to the lack of flammable materials on the Project site.

Scale Microgrids, LLC would operate and maintain the BESS, which would be designed with a safety system and in accordance with applicable laws, codes, and standards, including applicable National Fire Protection Association Standards. The system would be designed so that in the event of a fire, any internal fire is contained within the affected BESS enclosure and would not spread to the other parts of the facility. The BESS would have built-in, redundant protection functions at multiple equipment and software levels for temperature protection, voltage, and current protection, and “anti-islanding” protection that would cause an automatic shutdown in the event of a power outage or other grid problem. The BESS would have design features to prevent explosions and thermal runaway events, as well as emergency response procedures, onsite fire extinguishers and spill kits, and a fire suppression system.

Scale Microgrids, LLC would work closely with the City of Goleta and Santa Barbara County fire departments to ensure appropriate fire prevention equipment and response procedures are in place. Prior to operations, the Applicant would provide training to Santa Barbara County Fire Department fire fighters and first responders that is specific to the Project site and system configuration. Impacts from wildfire risk during operation and maintenance would be less than significant and no mitigation is required.

#### **5.9.3.1. Impact Conclusions and Mitigation Measures**

The proposed Project would result in potentially significant impacts due to hazards and hazardous materials and thus, mitigation measures T-1 (Construction Traffic Control Plan) (see Section 5.17, Traffic and Transportation) and HM-1 (Hazardous Substance Control and Emergency Response) are recommended. With implementation of MM HM-1 and T-1 impacts would be reduced to a less than significant level.