5.20. Wildfire

WILDFIRE If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, **would the project:**	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☒	☐	☐
(b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☒	☐
(c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☒	☐
(d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☒	☐

Significance criteria established by CEQA Guidelines, Appendix G.

5.20.1. Setting

Santa Barbara County has had 42 major wildfires over the past 88 years, resulting in a 48 percent chance of occurrence of a wildfire in any given year (Santa Barbara County, 2023, p. 5-19). The City of Goleta is located in a Mediterranean climate zone characterized by cool, wet winters and hot, dry summers – the long dry seasons typical of the Mediterranean climate ensures a prolonged fire season every year (City of Goleta 2012, p. 29). The foothills of the Santa Ynez mountains have steep topography and are covered in highly flammable chaparrals, which increase fire risk (City of Goleta, 2023, p. 44). Goleta is in a Wildland-Urban Interface (WUI) zone, where wildland-sparked fires directly threaten structures, vegetation, and life in an urban area.

Wildland fire protection in California is the responsibility of either the State, local, or federal government, depending on the location. The California Department of Forestry and Fire Protection (CAL FIRE) is required by law to map areas of significant fire hazards based on fuels, terrain, weather, and other relevant factors. These zones, which are referred to as Fire Hazard Severity Zones (FHSZ), influence how people construct buildings and protect property to reduce risk associated with wildland fires. FHSZ maps identify the likelihood that an area will burn over a 30 to 50-year period without considering that modifications may occur, such as fuel reduction efforts. Risk is not indicated by the maps. Risk is the potential damage that can be done by a fire, based on existing conditions. Risk can be reduced by various strategies, such as creation of defensible space, fuel load reduction, and, in the case of structures, the use of sprinklers and ignition-resistant building materials and construction.

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. Fire protection within the City is discussed in Section 5.15 (Public Services).

5.20.2. Regulatory Background

Federal

Nationally, most transmission line owners follow the National Electric Safety Code (NESC) rules or American National Standards Institute (ANSI) guidelines, or both, when managing vegetation around electrical system equipment. The NESC deals with electric safety rules including transmission wire clearance

standards; whereas, the applicable ANSI code deals with the practice of pruning and removal of vegetation.

State

Senate Bill (SB) 38 (Pub. Utilities Code, Section 761.3). This bill, passed in 2023, requires battery energy storage facilities to develop an emergency response and emergency action plan that covers the premises of the BESS facility, and submit the plans to the county and city where the facility is located.

SB 283 (Health and Safety Code Section 18944.22, Pub. Resources Code Sections 25545.15 and 25545.16, Pub. Utilities Code Section 8500). The Clean Energy and Safety Act of 2025 would require the California Buildings Standards Commission and the Office of the State Fire Marshal to incorporate the most recently published edition of the NFPA 855 Standard for the Installation of Stationary Energy Storage Systems into the next California Building Standards Code adopted after July 1, 2026.

National Fire Protection Association (NFPA) 855. The NFPA 855 sets key safety standards and requirements for BESS, including hazard mitigation analysis, fire safety provisions, technology-specific guidelines, installation and commissioning, and operation and maintenance. NFPA 855 is not a federal requirement for BESS, but states, counties, and cities may adopt the standards.

California Public Utilities Commission (CPUC) General Order (GO) 128. CPUC's GO 128 includes requirements for underground electrical supply and communication systems, ensuring adequate services and safety to all personnel engaged in construction, operation, maintenance, and use of the underground systems.

CPUC GO 165. The purpose of GO 165 is to establish inspection requirements for electric distribution and transmission facilities (including underground lines) to ensure safe and high-quality electrical service.

CPUC GO 167-C. This GO was modified in March 2025 to establish standards for the maintenance and operation of Energy Storage Systems (ESS), require Emergency Response and Emergency Action Plans for each Energy Storage System Owner (ESSO), and make technical updates to the Logbook Standards for all Generating Assets in order to improve safety, reliability, and effectiveness.

Fire Hazard Severity Zones (Pub. Resources Code, Sections 4201 to 4204.1). The purpose of establishing FHSZs is to provide for the classification of lands within State and Local Responsibility Areas in accordance with the severity of fire hazard present and identify measures to be taken to retard the rate of spreading and to reduce the potential intensity of uncontrolled fires that threaten to destroy resources, life, or property.

California Fire Code (CFC), Title 24, Part 9, Section 1207. Section 1207 of the CFC sets standards and requirements for Electrical ESS, including hazard mitigation analysis, fire mitigation and remediation, operation and maintenance, commissioning, decommissioning, and compliance with Underwriters Laboratories (UL) standards and test methods related to ESS (UL 1741, UL 1973, UL 1974, UL 9540, UL 9540A).

Local

City of Goleta General Plan. The objectives of the City's General Plan public safety policies in regard to wildfires are to reduce the threat to life, structures, and the environment caused by urban and wildland fires, and 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, with special attention given to fuel management and

improved access in areas with higher fire risk, with access or water supply deficiencies, or beyond a 5minute 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 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).

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).

5.20.3. Environmental Impacts and Mitigation Measures

Thresholds of Significance

The proposed Project would have a significant impact if it is near a state responsibility area or lands classified as very high fire hazard severity zones, or, if the Project were found to cause an impact defined in the above checklist. There are no thresholds related to Wildfire in the County of Santa Barbara's Environmental Thresholds and Guidelines Manual (2021), which has been adopted by the City of Goleta (adopted by Resolution 08-40).

Impact Analysis

(a) Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

DURING CONSTRUCTION - *LESS THAN SIGNIFICANT WITH MITIGATION*. The City of Goleta adopted an Emergency Operations Plan in 2023, which contains a wildfire risk assessment; identifies specific neighborhoods and infrastructure near foothills and open spaces as high-risk zones; includes mitigation, evacuation planning, and emergency response strategies; and emphasizes community engagement and education in wildfire preparedness (City of Goleta, 2023). The proposed Project does not conflict with any response or evacuation strategies identified in the Emergency Operations Plan.

The Project does not cross over or is not near any roads in a FHSZ (CAL FIRE, 2025). However, it is adjacent to U.S. 101 to the north and Hollister Avenue to the south, which are identified as emergency evacuation routes in the Santa Barbara County Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) (Santa Barbara County, 2023, p. 4-66). As stated in Section 5.17, Transportation, the Project may require brief temporary lane closures/disruptions. These would relate to the mobilization and demobilization of equipment and delivery of oversized loads. Closures would be short term. However, at least one lane of travel would remain open to accommodate roadway users (including emergency vehicles). As discussed in Section 5.17, Transportation, during temporary lane closures, Scale Microgrids, LLC would implement traffic control protocols and a project-specific traffic plan, as required under Mitigation Measure T-1 (Construction Traffic Control Plan) to accommodate traffic flow. There is no other aspect of the proposed Project, aside from traffic flow, that could impair an emergency response effort. Therefore, with incorporation of MM T-1, impacts from Project construction would not substantially impact emergency response or evacuation plans.

DURING OPERATIONS AND MAINTENANCE - *LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED.* The day-to-day operations of the proposed Project would have no impact on emergency response or evacuation because the Project would have no occupants, would not lead to an increase in the population, and would not lead to an increase of traffic on local roadways. Occasional maintenance activities would be short-term in duration and would occur within the property, and would not require lane closures.

As discussed in Section 5.15.2(a)(i) (Public Services), the proposed Project would not impact fire emergency response times during operation and maintenance except in an emergency. Prior to operations, the Applicant has committed to providing site-specific training for emergency personnel and designating a point of contact, as described in Section 4.11.1, Fire Safety.

To reduce the risk of an emergency on site, the BESS design would follow applicable standards that would be specific to the battery technology chosen, including, but not limited to, National Fire Protection Association 855 (standard for the Installation of Stationary Energy Storage Systems) and Section 1207 of the California Fire Code, both of which sets safety standards for BESS (Tesla, 2022). To ensure that these standards are met, implementation of MM HM-1 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 and other regulations.

The operation of the proposed Project would not result in a need for additional fire protection facilities, because it would not lead to an increase in population, or affect response times or other service performance, because it would not lead to an increase of traffic on local roadways. Additionally, implementation of MM HM-1 would reduce the risk of fire and require preparation of plans to prepare for an emergency. Therefore, operation and maintenance of the proposed Project would not substantially impair an emergency response plan or emergency evacuation plan. The result would be a less than significant impact.

Mitigation Measures for Emergency Response

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

MM HM-1 **Hazardous Substance Control and Emergency Response.** [see full text in Section 5.9, Hazards and Hazardous Materials]

(b) Would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

DURING CONSTRUCTION - *LESS THAN SIGNIFICANT.* The BESS facility would be unstaffed and would not include in 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). The BESS operational area is approximately 200 feet northeast of the Mariposa at Ellwood Shores elder care facility on the east side of Viajero Drive, approximately 300 feet east of the Hideaway residential neighborhood, and approximately 500 feet west of Ellwood Elementary School. Therefore, the following analysis focuses on the potential for Project construction and operation to increase the exposure of nearby sensitive receptors and residences to wildfire risks.

At Project completion, the BESS facility would be surrounded by an eight-foot-high ornamental metal no-climb fence, within which there would be no vegetation. 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.

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. Impacts from wildfire risk during construction would be less than significant and no mitigation is required.

DURING OPERATIONS 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. Additionally, the Project is located in a generally flat area, is not directly adjacent to any wildland areas, and is not located within or near a FHSZ.

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 during a fire event, any internal fire is contained within the affected BESS enclosure and would not spread to the other parts of the facility, due to the distance between the BESS enclosures, and their placement on non-flammable concrete foundations. The Project would be operated remotely, and would not have occupants on site, except for maintenance purposes. 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. Therefore, the BESS would not exacerbate wildfire risks, as the Project includes fire prevention and suppression systems.

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, explaining the materials used in the BESS, and how to effectively put the fire out, per the manufacturers Emergency Response Guide (Tesla, 2024), which is updated periodically. Impacts to wildfire risk during operation and maintenance would be less than significant and no mitigation is required.

(c) Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

DURING CONSTRUCTION - *LESS THAN SIGNIFICANT.* The proposed Project includes construction and installation of a new underground 200-foot-long 66 kV gen-tie line, as well as a BESS facility. The Project site is in an urban setting and activities associated with the proposed Project would generally occur within the Project boundaries. No fuel breaks would be required. Site access would be provided via a proposed private access easement at the existing EGS main gate on Las Armas Road. Another site access point would be constructed from the northern terminus of Viajero Drive on the eastern side of the BESS facility. Proposed offsite street frontage improvements include curb and sidewalk removal at the Viajero Drive site entrance. Detailed design review may identify additional required improvements, such as additional curbing or landscaping, relocation of existing signs, new water meter and connections to the water and fire water main system at driveway entrances, and additional fire hydrants, which would occur on the Project site, or immediately adjacent to the entrance of the Project. With regard to roadway improvements, a roadway analysis was completed for the Project, which concluded that no roadway improvements are necessary (see Section 5.17, Transportation). New water connections and additional fire hydrants would contribute to reducing the fire risk for the Project and surrounding area. Undergrounding the gen-tie line would negate the risk of wildfire sparked by events such as tree-to-wire contact or conductor-to-conductor contact. Therefore, impacts to fire risk during construction would be less than significant.

DURING OPERATIONS AND MAINTENANCE - *LESS THAN SIGNIFICANT.* Once the BESS is energized and interconnected, Scale Microgrids, LLC would assume operations and maintenance duties. Scale Microgrids, LLC would comply with all current federal and State laws related to vegetation clearance and fire prevention. No additional fire risk impacts would occur because of operating and maintaining the Project. Long-term operations would not require water consumption, and other utilities such as gas and sewage would not be required. No additional infrastructure that has not been considered would be installed, and no additional fire risk impacts would occur because of operating and maintaining the Project. Therefore, impacts to fire risk during operations and maintenance would be less than significant.

(d) Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

LESS THAN SIGNIFICANT. The Project would not include occupied structures and thus could not expose residents to increased fire risk. The proposed Project is located in an urban area with flat topography and low fuel load. During construction, there would be ground disturbance along the trench for the underground gen-tie line. The modular BESS units and ancillary structures would result in approximately 0.4 acres of new impervious surface. The remaining approximately 1.7 acres would remain pervious, including approximately 0.3 acres of perimeter road, approximately 0.7 acres within the perimeter road (i.e., the areas between the individual BESS units), and approximately 0.7 acres of buffer setback between the BESS perimeter road and the parcel boundaries.

During operation and maintenance, Scale Microgrids, LLC would comply with all current regulations related to vegetation clearance and fire prevention. Given the fire risk is low and the site is flat with no known historic landslides or slope instability and the limited amount of surface disturbance proposed, the exposure of people or structures to risks as a result of runoff, post fire instability, or drainage changes would be less than significant.

5.20.3.1. Impact Conclusions and Mitigation Measures

The proposed Project would result in potentially significant impacts related to wildfire risks. However, with implementation of mitigation measures T-1 (Construction Traffic Control Plan) (see Section 5.17, Traffic and Transportation) and HM-1 (Hazardous Substance Control and Emergency Response) (see Section 5.9, Hazards and Hazardous Materials) are recommended. With implementation of MM HM-1 and T-1 impacts would be reduced to a less than significant level.