

DRAFT MITIGATED NEGATIVE DECLARATION

Greenbark 30 Battery Energy Storage Project

Prepared for



Submitted by



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1. MITIGATED NEGATIVE DECLARATION

1.1. Project Information

Project:	Greenbark 30 Battery Energy Storage Project
Project Location	Within a 2.1-acre undeveloped site at the northern terminus of Viajero Drive, adjacent to the existing Ellwood Generating Station in the western portion of the City of Goleta, Santa Barbara County, California.
Project Sponsor:	Scale Microgrids Solutions Operating, LLC (Scale Microgrids, LLC) 51-53 S Broad Street Ridgewood, NJ 07450
General Plan:	The Project site currently has a General Plan Land Use Designation as General Commercial (C-G). The Applicant is requesting a General Plan Amendment to Office and Institutional (I-OI).
Zoning:	The Project site is currently zoned as General Commercial (CG). The Applicant is requesting a rezone of the parcel to Office Institutional (OI).

1.2. Introduction

Pursuant to the California Environmental Quality Act (CEQA), the City of Goleta (City) must prepare an Initial Study (IS) for the proposed Project to determine if any significant adverse effects on the environment would result from project implementation. The IS utilizes the significance criteria outlined in Appendix G of the CEQA *Guidelines*. If the IS for the project indicates that a significant adverse impact could occur, the City would be required to prepare an Environmental Impact Report.

According to Article 6 (Negative Declaration Process) and Section 15070 (Decision to Prepare a Negative Declaration or Mitigated Negative Declaration) of the CEQA Guidelines, a public agency shall pre-prepare or have prepared a proposed negative declaration or mitigated negative declaration for a project subject to CEQA when:

- (a) *The initial study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, or*
- (b) *The initial study identifies potentially significant effects, but:*
 - (1) *Revisions in the project plans or proposals made by, or agreed to by the applicant before a proposed mitigated negative declaration and initial study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, and*
 - (2) *There is no substantial evidence, in light of the whole record before the agency, that the project as revised may have a significant effect on the environment.*

Based on the analysis in the Initial Study, it has been determined that all project-related environmental impacts could be reduced to a less than significant level with the incorporation of feasible mitigation measures. Therefore, adoption of a Mitigated Negative Declaration (MND) will satisfy the requirements of CEQA. The mitigation measures included in this MND are designed to reduce or eliminate the potentially significant environmental impacts described in the Initial Study. Where a measure described in this document has been previously incorporated into the project, either as a specific project design feature or as an Applicant-Proposed Measure, this is noted in the discussion. Mitigation measures are structured in accordance with the criteria in Section 15370 of the CEQA *Guidelines*.

1.3. Project Description

The proposed Greenbark 30 Battery Energy Storage Project, proposed by Scale Microgrids, LLC (Applicant), would be a battery energy storage system (BESS) with an output power of 30-megawatts (MW) and a storage capacity of 120-megawatt hours (MWh). The development footprint would be within the central portion of the 2.1-acre Project site parcel, within an interior perimeter road. The BESS operational area would consist of the interior perimeter road, BESS equipment, and a perimeter fence.

The Greenbark 30 Battery Energy Storage Project would be located within a 2.1-acre vacant undeveloped site located at the northern terminus of Viajero Drive in western Goleta, California in Santa Barbara County. The property is adjacent to the existing Ellwood Generating Station (EGS) and is accessed from the northern terminus of Viajero Drive, approximately one-quarter mile north of Hollister Avenue.

Battery energy storage units would be charged from the electrical grid and would discharge as a California Independent System Operator (CAISO) market participant. An interconnection application was approved by Southern California Edison (SCE) and BESS interconnection studies are underway. It is anticipated that the BESS would interconnect to the existing SCE 66-kilovolt electrical transmission line along Las Armas Road.

1.4. Environmental Determination

The Initial Study was prepared to identify the potential environmental effects resulting from proposed Project implementation, and to evaluate the level of significance of these effects. The Initial Study relies on information from Scale Microgrids, LLC, their consultant, ERM, and associated submittals, site visits, and additional research.

1.5. Mitigation Measures

Implementation of the following mitigation measures would avoid potentially significant impacts identified in the Initial Study or reduce them to less than significant levels.

Mitigation Measures for Special-Status Animal Species

MM BIO-1 Worker Environmental Awareness Training. Prior to the initiation of BESS construction, a Worker's Environmental Awareness Program will be prepared and implemented. For this training, a qualified biologist will:

- Provide environmental training materials that include all relevant permit conditions, avoidance and minimization measures, identification of sensitive biological resources, and legal repercussions of environmental damage.
- Conduct a pre-construction meeting with work crews to review environmental training materials. Personnel will review the protective measures from the relevant permits. New crew members brought on during the Project will receive the same level of training.
- Copies of the permits and educational information will be distributed to personnel to be available at the work site.

MM BIO-2 Invasive Species Control. The Environmental Awareness training will include identification of common invasive species known to the local area, inspection procedures, and removal methodologies. Invasive species inspections and maintenance will be incorporated into Operation and Maintenance documentation for the Project.

MM BIO-3 Special Status Wildlife Avoidance.

- Within 3 days prior to initial clearing and grubbing of vegetation, a qualified biologist will conduct a pre-construction survey for special-status wildlife species, including the Western red bat. Should special-status species be observed, they will be monitored as grading and clearing progresses to confirm that they safely move out of the area.
- To protect potential red bat roosting habitat, pre-construction surveys will be conducted by a qualified biologist to identify suitable roost trees, particularly large mature trees with exfoliating bark or dense foliage. If active roosts are identified, a no-disturbance buffer of at least 100 feet will be established around the roost site, and work within this buffer will be postponed until the bats have naturally vacated the area. Vegetation removal will be scheduled outside of the bat maternity season (typically April 1 to August 31) to avoid disturbing maternal colonies.
- Trenches will be covered overnight, or a ramp will be provided at one end for wildlife to escape.

MM BIO-4 Crotch's Bumble Bee. Consistent with CDFW's 2023 guidance (Survey Considerations for CESA Candidate Bumble Bee Species), three visual survey passes for foraging and nesting Crotch bumble bee will be conducted by a qualified biologist during the Colony Active Period (April to August) preceding the initiation of construction. The survey passes will be separated by no less than 2 weeks and no more than 4 weeks. Survey passes will take place during the day (at least 1 hour after sunrise and 2 hours before sunset) on warm (65-90 degrees Fahrenheit), sunny days with low wind (less than 8 miles per hour). Survey results, including negative findings, will be submitted to the City. If survey results are negative, no further actions are required. Should Crotch bumblebee nests/colonies be detected within the Parcel during surveys, an avoidance plan will be developed, if feasible, in consultation with the City and in coordination with CDFW. No construction permits will be issued until the plan has been approved by the City and no further actions are required. If avoidance is infeasible, the Project proponent will initiate consultation with CDFW. No construction permits will be issued until a 2081 Incidental Take Permit is issued or CDFW provides written concurrence that a 2081 Incidental Take Permit is unnecessary.

Mitigation Measure for State or Federally Protected Wetlands

MM BIO-5 Fugitive Dust Control and Stormwater Protection. To minimize fugitive dust emissions and protect stormwater quality during construction, a combination of targeted design elements and operational practices will be implemented. Stabilized construction entrances using gravel pads will be installed at all access points to reduce sediment track-out, which can lower offsite dust transport by up to 80%. A water application system, including water trucks will be used to maintain soil moisture on disturbed surfaces, reducing airborne dust by up to 90% during active grading. Wind breaks such as temporary fencing or vegetative buffers will be placed strategically to reduce wind velocity and dust dispersion by 30–50%. Soil stockpiles will be covered with tarps and surrounded by silt fencing to prevent erosion and reduce dust emissions by over 95%. To maintain stormwater quality and hydraulic function, erosion and sediment control BMPs—including fiber rolls, check dams, and inlet protection—will be installed to prevent sediment-laden runoff while preserving flow conveyance. Daily inspections and adaptive management will ensure the effectiveness of these measures and compliance with regulatory requirements

Mitigation Measure for Nesting Birds

- MM BIO-7** **Nesting Bird Avoidance.** Removal of vegetation between 1 March and 15 September will be avoided to the extent feasible. Should vegetation removal be required on the Project site between 1 March and 15 September, a qualified biologist will conduct nesting bird surveys no more than 7 days prior to vegetation removal. If pre-construction surveys detect an active nest, no vegetation clearing, grading, construction, or other development activity will be permitted within 100 feet of the nest site (300 feet for raptors) during the nesting and fledging season to the extent feasible.

Mitigation Measures for impacts to unknown Cultural Resources

- MM C-1** **Cultural Resources Awareness Training.** Prior to the initiation of construction, all construction personnel shall be trained by an archaeologist qualified under 36 Code of Federal Regulations⁶¹ regarding the recognition of possible buried cultural resources (i.e., Native American and/or historical artifacts, objects, or features) and protection of all archaeological resources during construction. Training shall inform all construction personnel of the procedures to be followed upon the discovery of cultural materials. All personnel shall be instructed that unauthorized removal or collection of artifacts is a violation of state law. Any excavation contract (or contracts for other activities that may have subsurface soil impacts) shall include clauses that require construction personnel to attend the Workers' Environmental Awareness Program, so they are aware of the potential for inadvertently exposing buried archaeological deposits.

- MM C-2** **Inadvertent Discovery of Historical Resources, Unique Archaeological Resources, or Tribal Cultural Resources.** If previously unidentified cultural resources are uncovered during construction activities, construction work within 50 feet of the find shall be halted and directed away from the discovery until an archaeologist qualified by the Secretary of the Interior assesses the significance of the resource, in consultation with consulting Tribe(s), and makes a recommendation to the City of Goleta.

The archaeologist, in consultation with the City of Goleta, consulting Tribe(s), and any other responsible public agency, shall make the necessary plans for treatment of the find(s) and for the evaluation and mitigation of impacts if the find(s) is found to be eligible to the California Register, local register or qualify as a unique archaeological resource or a TCR under CEQA (PRC §21083.2).

- MM C-3** **Treatment of Human Remains.** Any human remains discovered in the Project site are to be treated with respect and dignity. Per Public Resources Code Section 5097.98(b), upon discovery of human remains, the following must occur: all work within 50 feet of the discovery area must cease immediately, nothing in the Project site is to be disturbed, and the area must be secured.

Per Health and Safety Code section 7050.5, the County Coroner's Office must be called in the event of an inadvertent discovery of human remains. The Coroner has two working days to examine the remains after notification. The appropriate land manager/owner of the site is to be called and informed of the discovery. It is very important that the suspected remains, and the area around them, are undisturbed and the proper authorities called to the scene as soon as possible, because it could be a crime scene. The Coroner would determine if the remains are archaeological/historic or of modern origin and if there are any criminal or jurisdictional questions. After the Coroner has determined that the remains are archaeological/historic-era, the Coroner would make recommendations concerning the treatment and disposition of the remains to the person responsible for

the excavation, or to his or her authorized representative. If the Coroner believes the remains to be those of a Native American, the Coroner shall contact the Native American Heritage Commission (NAHC) by telephone within 24 hours.

Per Public Resources Code section 5097.98, the NAHC would immediately notify the person it believes to be the most likely descendant (MLD) of the remains. The MLD has 48 hours from the time given to access the site to make recommendations to the landowner for treatment or disposition of the human remains. If the descendant does not make recommendations within 48 hours, the landowner shall reinter the remains in an area of the property secure from further disturbance. If the landowner does not accept the descendant's recommendations, the owner or the descendant may request mediation by NAHC.

According to the California Health and Safety Code, six or more human burials at one location constitute a cemetery (Section 8100), and willful disturbance of human remains is a felony (Section 7052).

Mitigation Measure for Geology and Soils

- MM GEO-1** **Inadvertent Discovery of Unique Paleontological Resources or Geologic Features.** If previously unidentified paleontological resources or geologic features are uncovered during construction activities, construction work within 50 feet of the find shall be halted and directed away from the discovery until a qualified paleontologist or geologist assesses the significance of the resource. The paleontologist or geologist, in consultation with the City of Goleta, and any other responsible public agency, shall make the necessary plans for treatment of the find(s) and for the evaluation and mitigation of impacts.

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.

Mitigation Measures for Construction Traffic

MM T-1 Construction Traffic Control Plan. Prior to the start of construction, Scale Microgrids, LLC shall prepare and submit a Construction Traffic Control Plan for review and approval to the City of Goleta (City) Planning Department for public roads and transportation facilities that would be directly affected by the construction activities and/or would require permits and approvals. Scale Microgrids, LLC shall submit the Construction Traffic Control Plan to the City prior to construction. The Construction Traffic Control Plan shall include, but not be limited to:

- Identification of any routes that would require lane closures or detours to accommodate material and equipment deliveries and methods to ensure safety.
- Avoidance of peak travel hours (8:00-10:00 a.m. and 4:00-6:00 p.m.) to the maximum extent feasible.
- Plans to coordinate in advance with emergency service providers to avoid restricting the movements of emergency vehicles. Police departments and fire departments shall

be notified in advance by Scale Microgrids, LLC of the proposed locations, nature, timing, and duration of any roadway disruptions, and shall be advised of any access restrictions that could impact their effectiveness. At locations where roads will be blocked, provisions shall be ready at all times to accommodate emergency vehicles.

- Plans to coordinate in advance with property owners, if any, that may have limited access to properties.

Mitigation Measure for Cumulative Noise Impacts

MM NOI-CUM-1 Concurrent Construction Coordination Plan. Prior to any ground-disturbing activities, the Project Applicant shall coordinate with the adjacent project proponent(s) to identify overlapping construction periods. If concurrent activities are scheduled within 500 feet of a shared property line, the applicants shall develop a construction noise reduction plan in consultation with the City. The plan may include but is not limited to: staggered work schedules, use of quieter equipment, temporary sound barriers, and notification to nearby sensitive receptors.

1.5.1. Conditions of Approval

The following conditions of approval are recommended to ensure compliance with various rules and regulations, and to reduce impacts to a less than significant level.

AES1. Recommended Condition of Approval: Design Review. Prior to the issuance of building permits, the Applicant/Permittee must secure Design Review Board (DRB) final approval of the site plan, architectural style, colors and materials of the project that ensure compatibility of massing, heights, landscaping, lighting, and architectural consistency with the existing neighborhood character.

Timing: Before applying for building permits, the Applicant/Permittee must apply for design approval from the DRB and submit plans wherein the massing, height, landscaping, lighting, and architectural style of all proposed energy storage project equipment is consistent with neighborhood land uses and buildings and do not detract from existing neighborhood character.

Monitoring/Reporting Party(ies): The Planning and Environmental Review Director, or designee, must conduct a final review of the final plans before the City issues a grading permit. If the final plans are not in substantial conformance with the approved plans, the Planning and Environmental Review Director may refer the matter back to the full DRB for a final determination. The Applicant/Permittee shall also demonstrate to PER compliance monitoring staff that the project has been built consistent with approved DRB design and landscape plans prior to Final Building Inspection Clearance.

AES2. Recommended Condition of Approval: Lighting Specifications. Any exterior lighting installed on the project site must be consistent with the City of Goleta's outdoor lighting standards (consistent with General Plan Policy VH 4.12, and City of Goleta Code of Ordinances Chapter 17.35, as listed below:

- (a) low intensity;
- (b) low glare design;
- (c) be hooded to direct light downward onto the subject parcel and prevent spill-over onto adjacent parcels;
- (d) otherwise meet dark sky requirements.

Exterior lighting fixtures must be kept to the minimum lighting level and intensity needed to ensure public safety. These lights must be dimmed after 11 PM to the maximum extent practical without compromising public safety as determined by the Planning and Environmental Review Director. Lighting fixtures must be appropriate for the architectural style of the structure and surrounding area. The final lighting plan must

be amended to include identification of all types, sizes, and intensities of wall mounted building lights and landscape accent lighting and a photometric map must be provided. "Moonlighting" type fixtures that illuminate entire tree canopies should also be avoided.

GEO1. Recommended Condition of Approval: Geotechnical Recommendations. All grading and earth-work recommendations from the project's geotechnical engineering report, including any updates, shall be incorporated into the final project design, including the final grading, foundation, utility, and infrastructure plans. All grading activities shall be supervised by a registered civil engineer or certified engineering geologist.

Plan Requirements and Timing: Final grading, foundation, utility, and infrastructure plans shall be reviewed and approved by City staff prior to approval of a grading permit.

Monitoring: The Planning and Environmental Review Director, or designee, shall verify compliance prior to any grading permit approval. Public Works staff shall periodically spot check in the field.

GEO2. Recommended Condition of Approval: Stormwater Pollution Prevention Plan (SWPPP) Development and Implementation. Following Project approval, the applicant will prepare and implement a SWPPP to minimize construction impacts on surface water and groundwater quality. Implementation of the SWPPP will help stabilize graded or disturbed areas and reduce erosion and sedimentation. The plan will designate BMPs that will be adhered to during construction activities. Erosion and sediment control measures, such as straw wattles, covers, and silt fences, may be installed before the onset of winter rains or any anticipated storm events if soils are not stabilized. Suitable stabilization measures will be used to protect exposed areas during construction activities, as necessary. During construction activities measures will be in place to prevent contaminant discharge.

The Project SWPPP will include erosion control and sediment transport BMPs to be used during construction. BMPs, where applicable, will be designed by using specific criteria from recognized BMP design guidance manuals. Erosion-minimizing efforts may include measures such as properly containing stockpiled soils.

Erosion control measures identified will be installed in an area before construction begins during the wet season and before the onset of winter rains or any anticipated storm events. Temporary measures such as silt fences or wattles, intended to minimize sediment transport from temporarily disturbed areas, will remain in place until disturbed areas have stabilized. The plan will be updated during construction as required by the SWRCB.

A worker education program shall be established for all field personnel prior to initiating fieldwork to provide training in the appropriate application and construction of erosion and sediment control measures contained in the SWPPP. This education program will also discuss appropriate hazardous materials management and spill response. Compliance with these requirements will be ensured by the on-site construction contractor.

N1. Recommended Condition of Approval: Construction Timing. Construction activity and equipment maintenance is limited to the hours between 8 AM and 5 PM Monday through Friday. Exceptions to these restrictions may be made for onsite work for good cause at the sole discretion of the Planning and Environmental Review Director. Exceptions to these restrictions for work in the City Right-of-Way may be made for good cause at the sole discretion of the Public Works Director or designee. Any subsequent amendment to the General Plan noise standard upon which these construction hours are based shall supersede the hours stated herein. No construction can occur on State holidays (e.g., Thanksgiving, Labor Day). Non-noise generating construction activities such as interior plumbing, electrical, drywall and painting (depending on compressor noise levels), are not subject to these restrictions.

Timing: At least one sign near each project site entrance stating these restrictions must be posted on the site. Signs must be a minimum size of 24" x 48." Signs must be in place before the beginning of and throughout grading and construction activities. Violations may result in suspension of permits.

Monitoring/Reporting Party(ies): The Planning and Environmental Review Director must monitor compliance with restrictions on construction hours and must promptly investigate and respond to all complaints.

N2. Recommended Condition of Approval: Noise Complaints. Upon receipt of a verified noise complaint regarding nuisance noise from the project site, the City will require the following:

- (a) The project operator shall conduct a noise survey of the project site conducted by a City-approved noise consultant.
- (b) The project operator shall have a report prepared by a City-approved noise consultant that describes the primary noise sources identified during the survey.
- (c) The noise report shall evaluate the broadband noise level and octave band data obtained by the survey; and determine if there is an audible tone or set of tones or an exceedance of the noise requirements of Zoning Ordinance Section 17.39.070.
- (d) If an exceedance or audible tones are identified, additional noise measurements shall be required to identify the noise source of concern and develop measures to reduce noise levels generated by the fans.
- (e) Noise reduction measures may include, but are not limited to: the use of alternate fan settings, fan speeds, fan blade angle, or even passive barriers. Barriers can be located at ground level and surround the site, or be located along a property line. If specific equipment is the primary source, then the barriers can be located adjacent to the equipment, or placed on the equipment, such as on top of the MegaPack. At minimum, the noise attenuation barriers must have a weight of two pounds per square foot or greater. This can include, but is not limited to 18-gauge steel sheet, 5/32 glass panels, and 5/8-inch-thick plywood. In addition, the barrier must be solid with no holes, gaps, or perforations and well-sealed to the surface to which it is attached.

Monitoring/Reporting Party(ies): The Planning and Environmental Review Director must promptly respond to all project-related nuisance noise complaints, require the project operator to implement the required noise surveys described above, and monitor compliance with noise complaint resolution measures.

1.5.2. Mitigation Monitoring Plan

A Mitigation Monitoring Plan (see Section 6) has been prepared to ensure that the mitigation measures presented above are properly implemented. The plan describes specific actions required to implement each measure, including information on timing of implementation and monitoring requirements.

Based on the analysis and conclusions of the Initial Study, the impacts of the Project as proposed by Scale Microgrids, LLC, would be mitigated to less than significant levels with the implementation of the mitigation measures presented herein, which have been incorporated into the proposed Project.

2. ENVIRONMENTAL DETERMINATION

2.1. Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact” and requiring implementation of mitigation as indicated by the checklist on the following pages.

- | | | |
|---|---|---|
| ☐ Aesthetics | ☐ Agriculture & Forestry Resources | ☐ Air Quality |
| ☒ Biological Resources | ☒ Cultural Resources | ☐ Energy |
| ☒ Geology/Soils | ☐ Greenhouse Gas Emissions | ☒ Hazards & Hazardous Materials |
| ☒ Hydrology/Water Quality | ☐ Land Use/Planning | ☐ Mineral Resources |
| ☐ Noise | ☐ Population/Housing | ☐ Public Services |
| ☐ Recreation | ☒ Transportation | ☐ Tribal Cultural Resources |
| ☐ Utilities/Service Systems | ☐ Wildfire | ☐ Mandatory Findings of Significance |

2.2. Environmental Determination

On the basis of this initial evaluation:

- ☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a **NEGATIVE DECLARATION** will be prepared.
- ☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A **MITIGATED NEGATIVE DECLARATION** will be prepared.
- ☐ I find that the proposed project MAY have a significant effect on the environment, and an **ENVIRONMENTAL IMPACT REPORT** is required.
- ☐ I find that the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An **ENVIRONMENTAL IMPACT REPORT** is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Mary Chang

12/4/25

Mary Chang, Project Manager
Supervising Planner
City of Goleta

Date

3. INTRODUCTION TO THE INITIAL STUDY

3.1. Proposed Project Overview

The proposed Greenbark 30 Battery Energy Storage Project, proposed by Scale Microgrids, LLC (Applicant), would be a battery energy storage system (BESS) with an output power of 30-megawatts (MW) and a storage capacity of 120-megawatt hours (MWh). The development footprint would be within the central portion of the 2.1-acre Project site parcel, within an interior perimeter road. The BESS operational area would consist of the interior perimeter road, BESS equipment, and a perimeter fence.

The Greenbark 30 Battery Energy Storage Project would be located within a 2.1-acre vacant undeveloped site located at the northern terminus of Via Jero in western Goleta, California in Santa Barbara County, see Figure 4-1 and Figure 4-2. The property is adjacent to the existing Ellwood Generating Station (EGS) and is accessed from the northern terminus of Via Jero, approximately one-quarter mile north of Hollister Avenue.

Battery energy storage units would be charged from the electrical grid and would discharge as a California Independent System Operator (CAISO) market participant. An interconnection application was approved by Southern California Edison (SCE) and BESS interconnection studies are underway. It is anticipated that the BESS would interconnect to the existing SCE 66-kilovolt electrical transmission line along Las Armas Road.

3.2. Environmental Process

3.2.1. CEQA Process

This Initial Study (IS) has been prepared pursuant to the California Environmental Quality Act (CEQA) and the amended State CEQA Guidelines (14 CCR 15000 et seq.). The purpose of the IS is to inform the decision-makers, responsible agencies, and the public of the proposed Project, the existing environment that would be affected by the project, the environmental effects that would occur if the project is approved, and proposed mitigation measures that would avoid or reduce environmental effects.

A Mitigated Negative Declaration (MND) has been prepared based on the assessment of potential environmental impacts identified in the IS. All potentially significant impacts associated with the project can be mitigated to a level below significance; therefore, an MND can be adopted by the City of Goleta in accordance with Section 21080 of the CEQA Public Resources Code.

3.2.2. CEQA Lead Agency

The City of Goleta is the lead agency for review of the Project under CEQA because it must make a decision whether to adopt the MND and to approve or deny the discretionary approvals necessary for the Project. See Section 4.13 for a description of the approvals necessary.

3.2.3. Initial Study

The IS presents an analysis of potential effects of the proposed Project on the environment. The IS is based on information from Scale Microgrids, LLC, their consultant, ERM, and associated submittals, site visits, and additional research.

Construction activities and project operation could have direct and indirect impacts on the environment. The following environmental parameters are addressed based on the potential effects of the proposed

Project and potential growth-inducing or cumulative effects of the project in combination with other projects:

- | | | |
|-------------------------------------|---------------------------------|--------------------------------------|
| ■ Aesthetics | ■ Hazards & Hazardous Materials | ■ Recreation |
| ■ Agricultural & Forestry Resources | ■ Hydrology/Water Quality | ■ Transportation |
| ■ Air Quality | ■ Land Use/Planning | ■ Tribal Cultural Resources |
| ■ Biological Resources | ■ Mineral Resources | ■ Utilities/Service Systems |
| ■ Cultural Resources | ■ Noise | ■ Wildfire |
| ■ Energy | ■ Population/Housing | ■ Mandatory Findings of Significance |
| ■ Geology/Soils | ■ Public Services | |
| ■ Greenhouse Gas Emissions | | |

The IS has been organized into the following sections:

- Section 3: Introduction. Provides an introduction and overview describing the proposed Project and the CEQA process, and identifies key areas of environmental concern.
- Section 4: Project Description. Presents the project objectives and provides an in-depth description of the proposed Project, including construction details and methods.
- Section 5: Environmental Analysis and Mitigation. Includes a description of the existing conditions and analysis of the proposed Project's potential environmental impacts, and identifies mitigation measures to reduce potentially significant impacts to less than significant levels.
- Section 6: Mitigation Monitoring Plan. Includes mitigation measures that Scale Microgrids, LLC must implement as part of the project, actions required to implement these measures, monitoring requirements, and timing of implementation for each measure.

Note: Appendices are available for review at, or can be obtained through, the City of Goleta Planning and Environmental Review Department, located at: 130 Cremona Drive, Suite B, Goleta, California 93117. Digital copies of the following documents are available online at: <https://www.cityofgoleta.org/your-city/planning-and-environmental-review/ceqa-review>

- Appendix A: List of Preparers
- Appendix B: References
- Appendix C: Visual Renderings
- Appendix D: Air Quality and Greenhouse Gas Report
- Appendix E: Biological and Aquatic Resources Technical Report
- Appendix F: Cultural Resources Report **[Confidential Appendix]**
- Appendix G: Geotechnical Evaluation Report
- Appendix H: Hazards Analysis and Risk Assessment
- Appendix I: Drainage Analysis
- Appendix J: Stormwater Control Plan
- Appendix K: Construction Stormwater Pollution Prevention Plan (SWPPP)
- Appendix L: Noise Assessment Report
- Appendix M: Noise and Vibration Modeling
- Appendix N: Traffic, VMT, and Parking Study

4. PROJECT DESCRIPTION

4.1. Project Title

Greenbark 30 Battery Energy Storage Project (Project or proposed Project) (Case numbers 24-0007-DP, 24-0002-ORD, 24-0002-CUP, 24-0001-GPA, and 24-0002-DRB)

4.2. Lead Agency Name and Address

City of Goleta
130 Cremona Drive, Suite B
Goleta, CA 93117

4.3. Lead Agency Contact Person and Phone Number

Travis Lee, Project Manager
Associate Planner
Phone: 805-562-5528
E-mail: tlee@cityofgoleta.gov

4.4. Project Sponsor's Name and Address

Scale Microgrids Solutions Operating, LLC (Scale Microgrids, LLC)
51-53 S Broad Street
Ridgewood, NJ 07450

4.5. Project Location

The Greenbark 30 Battery Energy Storage Project would be located on a 2.1-acre vacant undeveloped site located at the northern terminus of Viajero Drive in western Goleta, California in Santa Barbara County. Please refer to Figure 4-1 and Figure 4-2 for locational information. The property is adjacent to the existing Ellwood Generating Station (EGS) and is accessed from the northern terminus of Viajero Drive, approximately one-quarter mile north of Hollister Avenue. The Assessor's parcel number (APN) for the site is 079-210-053.

4.6. General Plan Designation

The parcel's General Plan land use designation is General Commercial (C-G). The Applicant is requesting a General Plan Amendment to Office and Institutional (I-OI).

4.7. Zoning

The Applicant is requesting a rezone of the subject parcel from General Commercial (CG) to Office Institutional (OI). The Project site parcel and adjacent parcels to the east, south, and southeast are zoned CG. The EGS parcel adjacent to the west of the site, the Ellwood Elementary School approximately 500 feet to the east, and the Union Pacific Railroad (UPRR) adjacent to the north are zoned Public/Quasi Public (PQ). The Hideaway residential neighborhood west of Las Armas Road, approximately 350 feet to the west, is zoned Planned Residential (RP). Approximately 500 feet to the south, south of Hollister Avenue, is the Ellwood Mesa Open Space and Sperling Preserve, which is zoned as Open Space/Passive Recreation

(OSPR). To the southwest, adjacent to the preserve, is a residential development that is zoned as Single Family Residential (RS-7), with a minimum lot area of 7,000 square feet¹.

4.8. Surrounding Land Uses and Setting

Surrounding uses to the north include Union Pacific Railroad (UPRR) rail line right-of-way and an associated earthen berm, U.S. Interstate Highway 101 (US 101), and residential neighborhoods north of the highway. To the east is a commercial parking lot and east of that the Ellwood Elementary School. The Mariposa at Ellwood Shores elder care facility is located to the southeast across Viajero Drive. To the south is a vacant commercial parking lot and Hollister Avenue. To the west are the Ellwood Generating Station (EGS)², Las Armas Road, and the Hideaway residential neighborhood. Figure 4-2 illustrates the City of Goleta's General Plan Land Use designations.

A 64-foot-wide undeveloped private road easement, referred to as Campesino Drive, runs east-west between Las Armas Road and the northern terminus of Viajero Drive. This easement is on the adjacent parcel to the south (vacant commercial parking lot), and abuts the Project site parcel's southern border.

Land uses south of Hollister Avenue include Sandpiper Golf Course, The Bluffs residential neighborhood, and Ellwood Mesa Open Space and Sperling Reserve.

The Project site parcel is generally flat, sloping gently from north to south. An informal dirt footpath has been established along the eastern portion of the Project site parcel from Viajero Drive.

¹ Based on information in the City of Goleta's New Zoning Ordinance at: <https://nebula.wsimg.com/b610c2856bef06a48b0e5e8f256c1ed0?AccessKeyId=8B11547F66E8794DD29E&disposition=0&alloworigin=1>

² In 2024, Rockland Capital acquired ownership of the EGS facility from GenOn Holdings, LLC.

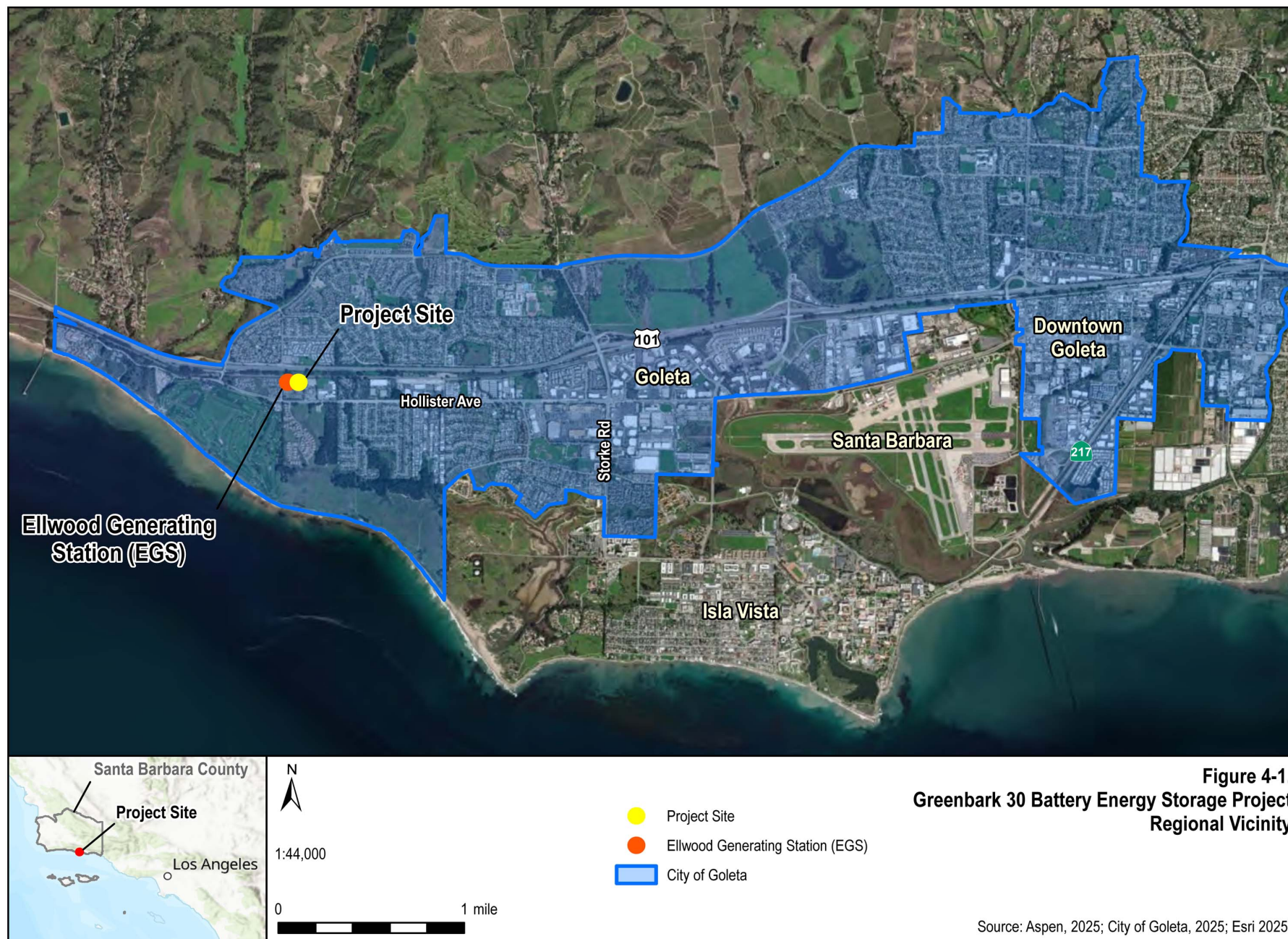
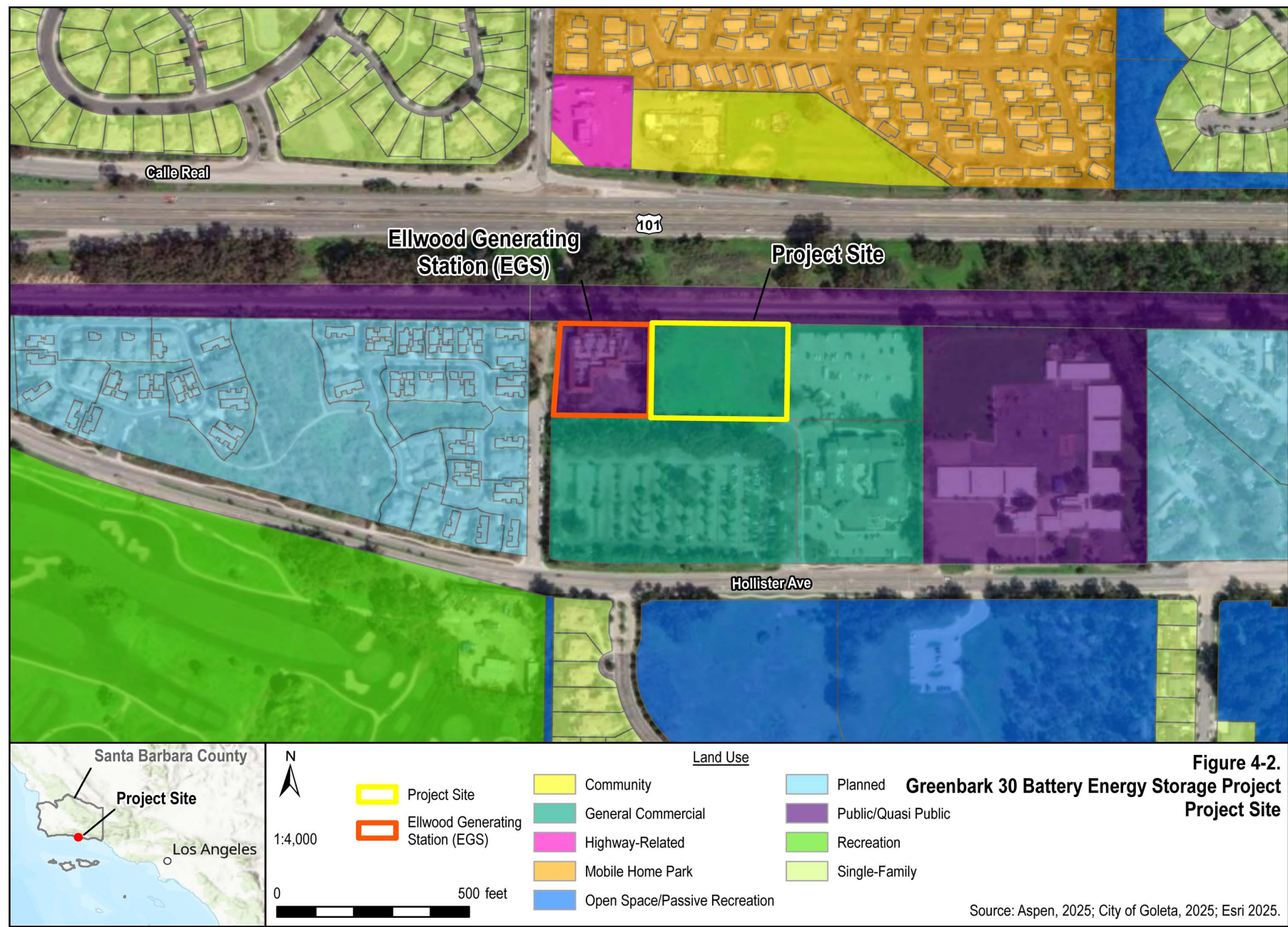
Figure 4-1. Greenbark 30 Battery Energy Storage Project Regional Vicinity

Figure 4-2. Greenbark 30 Battery Energy Storage Project Site



4.9. Description of the Project

4.9.1. Overview

The proposed Greenbark 30 Battery Energy Storage Project, proposed by Scale Microgrids, LLC (Applicant), would be a battery energy storage system (BESS) with an output power of 30-megawatts (MW) and a storage capacity of 120-megawatt hours (MWh).³ The BESS would be a Tesla Megapack 2 XL System, consisting of Megapack 2 XL units (Megapacks, or battery units) and a Tesla System Controller. The Megapacks and Tesla System Controller are modular ground-mounted enclosures. The development footprint would be within the central portion of the 2.1-acre Project site parcel, within an interior perimeter road. The BESS operational area would consist of the interior perimeter road, BESS equipment, and a perimeter fence.

A minimum 15-foot setback would be provided along the east, north, and west boundaries. In the southern portion of the parcel, the proposed Project has been designed to include a 50-foot buffer setback between a seasonal wetland feature located along the southern edge of the parcel and the BESS fence line. Landscape visual screening is proposed along the southern, northern, and eastern perimeters of the BESS facility, and ground level landscaping is proposed on the western perimeter.

A stormwater retention basin would be constructed on the south (downslope) portion of the BESS facility. Landscape design and plant selection would be appropriate for the Project site and consistent with the City of Goleta's urban design standards. The final layout may vary pending City of Goleta Design Review and final design.

Battery energy storage units would be charged from the electrical grid and would discharge as a California Independent System Operator (CAISO) market participant. An interconnection application was approved by Southern California Edison (SCE) and BESS interconnection studies are underway. It is anticipated that the BESS would interconnect to the existing SCE 66-kilovolt electrical transmission line along Las Armas Road.

The battery energy storage facility would be operated independently from the EGS. Demand for electric capacity from EGS is controlled by CAISO in coordination with the California Public Utilities Commission (CPUC) and SCE. The duration of potential continued demand is not known.

In June 2021, the CPUC approved a decision ordering utilities to procure 11.5 gigawatts of new zero-emitting electricity resources to come online between 2023 and 2026. Battery energy storage will be needed to achieve California's clean energy goals. The Project would supplement SCE's power supply by receiving electricity through the existing power grid system, including power generated from solar and wind sources, and storing the energy until it is needed during peak demand periods. The BESS facility would also support electricity grid resiliency in the event of an emergency or disaster and would replace electricity generation capacity that will be lost when the EGS is retired. The EGS peaking plant is currently used to supplement the region's peak power demand requirements.

4.9.2. Project Objectives

The objectives of the Greenbark 30 Battery Energy Storage Project are to:

- Assist California in achieving clean energy goals by storing energy produced by solar and wind sources until it is needed during peak demand periods;
- Increase electrical grid reliability and support electrical grid resiliency in the event of an emergency or disaster;

³ The output power and storage capacity are calculated at the Point-of-Interconnection.

- Replace electricity generation capacity that will be lost when the EGS is retired;
- Support the distribution and transmission grid by offering voltage, frequency, and capacity services; and
- Reduce outages due to distribution system overloads by providing additional capacity at localized distribution points.

4.9.3. Project Components

The Project involves two major components: the Battery Energy Storage System and a 66 kilovolt (kV) line to interconnect to the existing SCE substation located within the EGS switchyard.

4.9.3.1. Battery Energy Storage System

A BESS is an electrochemical system that is charged with power from the grid or a generating station and then discharged later, to provide electricity or other grid services when needed. Battery energy storage systems work by converting the alternating current (AC) power to direct current (DC) power and storing it as electrochemical energy. Battery energy storage can also directly store DC power generated by solar panels or other DC power sources and storing it as DC energy and then converting it to AC power for distribution into the power grids at a later time.

The proposed BESS is a stand-alone battery energy storage system that would connect with the adjacent SCE Substation at a distribution voltage. The battery itself is a DC source with a voltage of 1,500 volts DC. An inverter changes the DC voltage to 480 volts AC. That voltage is then transformed to a distribution station voltage such as 4, 12, 15, or 34 kV voltage. Additional transformation may be required to meet transmission interconnection voltages.

The BESS would be designed, constructed, operated, and maintained in accordance with applicable industry best practices and regulatory requirements.

BESS components would occupy the center portion of the property. A 20-foot-wide internal perimeter road would encompass the BESS equipment and provide dual access from Viajero Drive in the southeast corner of the site and the adjacent EGS in the southwest corner of the site. See Figure 4-3, Greenbark 30 Battery Energy Storage Project Site Plan.

Battery units are steel and measure 28.9 feet long, 5.6 feet wide, and 9.2 feet high and are painted white.

Energy storage project components will include:

- Approximately 36 battery units (Megapacks), each consisting of:
 - Battery module bays, which can cumulatively hold up to 24 battery modules per battery unit. A battery module is a collection of individual battery cells, and is the smallest field-replaceable battery unit.
 - A Thermal System, within the battery unit, which consists of a thermal cabinet and a thermal roof. The thermal cabinet includes pumps that circulate coolant through the battery unit and a compressor that maintains thermal control, in addition to an in-line heater that can warm the coolant. The thermal roof, or top cabinet of the enclosure, provides overpressure vents, ventilation airspace and contains fans and radiators that cool the ethylene glycol-water coolant solution.
 - A Customer Interface Bay that includes all the external connections needed for initial installation and the Megapack AC circuit breaker.
 - A non-walk-in ingress protection enclosure (code IP66) that provides a high level of protection against particle and water ingress for components internal to the enclosure.

- Third-party multi-spectrum infrared heat or flame detectors installed externally when fire detection is required at a site.
- Inverters, power conversion systems (PCS's), power distribution system, transformers, and switchgear
- Safety elements designed into the cell, module, and unit
- Internal circulation road for emergency access per Goleta and Santa Barbara County regulations
- The site will incorporate City of Goleta and County of Santa Barbara emergency response requirements and capabilities

4.9.3.2. 66 kV Line Interconnection

The electrical grid point of interconnection (POI) would be within the existing SCE substation that is co-located with the EGS. The approximately 200-foot-long generation-tie line would be placed underground between the BESS transformer pad in the western end of the BESS facility and the SCE substation (See Figure 4-3). Under this design scenario, no new offsite power poles or conductors would be needed to connect the BESS switchyard to the grid interconnection.

4.9.3.3. Security, Fencing, Lighting, and Internal Roads

An 8-foot-high ornamental metal no-climb fence would be constructed around the perimeter access road to encompass the BESS operational area and maintained for site security. Security lighting would be installed at appropriate locations along the perimeter and interior of the BESS operational area. Light fixtures would be shielded and oriented downward to avoid creating a source of glare and light levels would be less than 0.1 foot-candles at the property line, consistent with the City's lighting standards.

The Project would be shielded from view with vegetative screening, fencing, or other screening measures consistent with City standards. The vegetation in the remaining undeveloped portions of the parcel outside of the perimeter fence would be maintained.

Proposed offsite street frontage improvements including potential curb and sidewalk removal at the Viajero Drive site entrance, would be identified during detailed design review. 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 within or immediately adjacent to the Project site, at the driveway entrance to the Project. With regard to roadway improvements, a roadway analysis was completed for the Project, which concluded that no roadway improvements are necessary. To the extent that roadway and curbing improvements may be required, such improvements would be coordinated with adjacent offsite developments, as appropriate. The internal perimeter road would be surfaced with permeable gravel or other permeable all-weather material. The remainder of the ground surface within the BESS operational area will be covered with gravel. The combined internal modular BESS units and ancillary structures would result in approximately 0.4 acres of new impervious surface. The remaining approximately 1.7 acres of the parcel 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.

Figure 4-3. Greenbark 30 Battery Energy Storage Project Site Plan



4.9.3.4. Safety Systems and Controls

The BESS would be designed and operated in accordance with applicable industry best practices for fire safety, including applicable National Fire Protection Association standards.

The BESS would be comprised of modular Megapack units, each consisting of up to 24 lithium iron phosphate (LFP) battery modules, which are designed to comply with major installation codes for energy storage systems, including NFPA 855, IFC 2018 and 2021, and NEC 2020 (Tesla, 2022). Physical, electrical, and control designs mitigate safety risks associated with the unit. The BESS would have built-in, redundant protection functions 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 supplier will conduct ongoing system safety improvements and collect and communicate pertinent industry updates, product news, and safety bulletins on a regular basis to the BESS facility operator.

See Section 4.11.1 for information regarding fire safety.

4.9.3.5. Landscaping and other Code Conformance Design Features

The existing site is undeveloped land. The City’s Design Review Board (DRB) reviewed the Conceptual Design on 14 May 2024, and the current design reflects DRB input, see Figure 4-3. A minimum 50-foot buffer setback would be provided between the seasonal isolated wetland feature along the southern edge of the Project site parcel and the BESS fence line. Approximately 0.3 acres of landscaping is proposed along the perimeter of the BESS facility, see Figure 4-3. Visual screening landscaping would occur on the northern, southern, and eastern boundaries of the Project site, and additional ground cover landscaping would be installed in the remaining areas of the property.

A portion of the landscaping, as well as the approximately 0.1-acre bioswale for stormwater retention, would be constructed within the 50-foot wetland setback along the south edge and downslope of the BESS perimeter fence.

Landscape and bioswale design and plant selection would be consistent with the City of Goleta’s urban design and stormwater management standards.

The proposed Project is designed in conformance with applicable design standards. Table 4-1 lists applicable Goleta design-related standards, codes and guidelines, and the Project’s conformance with those standards.

Table 4-1. Design Standards and Project Conformance

Design Standard, Code, or Guidance	BESS Facility Conformance
I-OI Zone District Development Standards, Table 17.09.030 Development Regulations:	
■ Maximum lot coverage: 40% ■ Maximum height: 35 ft. ■ Minimum Setbacks ● Front: 15 ft. ● Interior Side: 15 ft. ● Street Side (same as Front): 15 ft. ● Rear: 15 ft. ■ Minimum Landscaping Coverage: 10% ■ Parking per GMC 17.38, Parking and Loading	■ Lot coverage: 35% ■ Facility height: 10 ft ■ Setbacks ● Front: 15 ft. ● Interior side: 15 ft. ● Street side: 20-50 ft. (includes ESHA setback) ● Rear: 15 ft. ■ Landscape Coverage: 15% ■ Parking: 2 spots

Design Standard, Code, or Guidance	BESS Facility Conformance
ESHA Setbacks Standards, GMC 17.30.100 Protection of Wetlands Outside the Coastal Zone, Part B.1:	
The required wetland buffer shall be no less than 50 feet in width.	ESHA Buffer: Minimum 50 ft. between ESHA (wetland) and BESS fence line
Landscaping Standards, GMC 17.34	Landscape plan includes appropriate native or non- invasive drought tolerant species.
Water Efficient Landscaping, GMC 15.21	Plan includes water efficiency per the Water Efficient Landscape Ordinance (WELO).
GMC DRB Required Findings for Landscape Plans (17.58.080.G, H)	Landscape design is proportional, preserves specimen and protected trees, and includes native and non-invasive screening and groundcover vegetation.
Lighting Standards, GMC 17.35	Light fixtures will be shielded and oriented downward to avoid creating a source of glare and light levels are less than 0.1 foot-candles at the property line.
Parking Standards, GMC 17.38	Two (2) designated spaces within the BESS operating area.
Multiple Districts Standards, GMC 17.24	
Maximum height of fences outside of setback: 8 ft	Fences outside of setback: 8 ft
Grading Standards, GMC 17.24	Site development will require minimal grading with balanced cut and fill. Pending detailed civil design, an estimated 100 cubic yards of imported engineered fill material may be needed.
Hazards Standards, GMC 17.39.060	BESS operations will be designed to avoid exposure of existing residential or commercial developments to significant health and safety risks. There are no Recognized Environmental Conditions on the site parcel. Hazardous materials will be managed in accordance with appropriate standards.
Noise Standards, GMS 17.39.070	Project-generated noise will be below the maximum exterior noise exposure level of 65 dBA Ldn at all noise sensitive locations.

Sources: Goleta Municipal Code Chapter 17 development standards and procedures for site development, including standards specific to the Office Districts (17.09), standards that apply to multiple districts (17.24), grading (17.24), development near ESHA (17.30), landscaping (17.35), lighting (17.35), parking (17.38), and performance standards related to hazards and noise (17.39): <https://www.cityofgoleta.org/home/showdocument?id=23253>.

Landscaping would be designed in conformance with development standards of the GMC for the OI zone district to the extent practicable given the industrial nature of the BESS facility. Landscape design is proportional to the overall site development; the plan would preserve specimen trees to the extent practical and include native screening and groundcover vegetation.

A combination of landscaping visual screening and ground level landscaping is proposed along the perimeter of the BESS facility. Landscape plantings would include a mix of commonly used California native landscape screening species, such as Santa Cruz Island Ironwood, Holly Leaf Cherry, Western Redbud, Pacific wax myrtle, Lemonade Berry, Toyon, Pink-flowering Currant, Mugwort, and ground-level vegetation such as thingrass.

Existing trees would remain except where trees need to be removed to accommodate safe access. Pending detailed design and fire safety review, the eucalyptus trees along the western perimeter of the Project site parcel may need to be pruned or removed. The combined landscape coverage would be approximately 0.3 acres (approximately 15% of the lot coverage) which exceeds the 10 percent minimum lot coverage specification in the IO zone district standards.

The top of BESS units and associated facilities would be approximately 10 feet above ground surface, including the height of the battery storage unit and a supporting concrete pad. Because of the site slope,

the northernmost portion of the battery system would be at a slightly higher ground elevation than the southern portion. Pending detailed design, certain vertical elements of the facility may exceed 10 feet, such as the BESS containers, which are 9.2 feet in height, but may be taller depending on the height of the foundation. Facilities will not exceed the IO zone district height limitation of 35 feet.

The final design would ensure that site development conforms to applicable standards specific to the IO zone district to the extent practicable, as well as general standards for grading, development near an ESHA, lighting, parking, hazards, hazardous materials, and noise.

Conceptual DRB review occurred on 14 May 2024, and the Project design was modified accordingly. Pending additional DRB review, the current design is anticipated to meet all the applicable IO zone district development standards (i.e., for lot coverage, buildings separation, setbacks, parking, landscaping, or screening requirements). As needed, the Applicant would work with the City of Goleta to obtain an adjustment to the standards pursuant to Zoning Ordinance Section 17.59.040 (Development Plans: Adjustments to Development Standards). In accordance with Section 17.59.040, the Applicant would work with the City to ensure that there is appropriate justification and explanation as to why the adjustment is consistent with the intent of the applicable General Plan policies. Any adjustment to height or lot coverage standards would be subject to review and approval by the Planning Commission. At this time no adjustments have been requested and as such, not studied within this document.

4.10. Project Construction Activities

4.10.1. Schedule

Project construction is anticipated to take 8 months. Construction includes site preparation and minor vegetation clearing, rough and fine grading, installing the BESS foundations and BESS enclosures, laying the underground electrical collection and communication lines, assembling accessory electrical components including transformers, and installing high-voltage equipment such as the generation-tie line. Table 4-2 identifies the estimated duration for various construction activities.

Permitting of the BESS is planned for 2025-2026. BESS installation is planned for early 2026-2027, to be commercially operational in 2027. Site preparation, earthwork, and foundation pad installation is anticipated to take place over a period of 3 months, delivery and installation of BESS equipment an additional 3 to 4 months, and testing and commissioning of the BESS an additional 3 to 4 months.

Table 4-2. Construction Activities and Estimated Durations

Construction Activity	Estimated Durations*
Construction Kick-off/Staging (including mobilization)	5 days
Site Clearing	5 days
Site Preparation/Rough Grading	5 days
Fine/Pad Grading, Excavation for Underground Conduit/Utilities, and Stormwater LID Areas	20 days
Construction of Foundation Pads	25 days
BESS Enclosure and Power Conversion System Unit Installation	20 days
Onsite Project Generation-Tie Line Installation	30 days
Paving for Drive Aisles	10 days
Landscaping, Lighting, Architectural Finishes	30 days
Testing	15 days
Total	8 Months

*Durations are preliminary estimates. Certain activities may overlap.

Construction crews would generally work Monday through Friday during daytime hours (typically from 8:00 a.m. to 5:00 p.m.). Nighttime construction work is not anticipated for the Project.

4.10.2. Workforce

Construction personnel would consist of up to approximately 20 craft workers and supervisors at any one time, depending on the construction activities.

Construction vehicles and equipment would access the site via the site entrance at Viajero Drive. Equipment and materials would be staged on site. Project-related vehicles would avoid parking on surface streets unless it is necessary to complete a specific construction task. Portable toilets would be provided for construction work crews, and would be maintained by a licensed sanitation contractor.

Construction trip generation would entail:

- Mobilization and demobilization of heavy equipment (e.g., excavator, backhoe) at the start and end of earthwork or other construction stage
- Delivery of the major BESS equipment components
- An estimated maximum of 15 worker vehicles per day during construction and commissioning of the Project

Some work phases would overlap, with an estimated maximum of 20 workers on site.

4.10.3. Site Grading and Preparation

Prior to initial construction mobilization, any required preconstruction biological surveys would be performed, and any required sediment and erosion control measures would be implemented in accordance with an approved Storm Water Pollution Prevention Plan (SWPPP).

Conventional construction equipment would be used to install access improvements, equipment pads, and components.

A geotechnical analysis was performed for the Project. Earthwork would be required to excavate shallow foundations for concrete pads for the battery modules and auxiliary equipment, and for shallow trenching for conduits. Foundation install may include driven piles.

An approximately 200-foot-long generation-tie line would be placed underground between the BESS transformer pad in the southwest corner of the BESS facility and the SCE substation.

The site is relatively level, and site grading would be minimal. Based on these site conditions, the Project is anticipated to balance cut and fill grading, with no net import of soil required for BESS foundations. However, pending detailed civil design, additional engineered soil materials may need to be imported for use in foundations for concrete pads for the battery modules and auxiliary equipment, or for other purposes, such as in the conduit trench. To address this contingency, the work plan assumes a net import of up to 100 cubic yards (ten truck loads) of imported soil material.

Raw materials required for construction include engineered fill and gravel for entryways, BESS perimeter road and parking aisles, and pervious areas within the operational fence line; gravel, sand, cement, steel and lumber for concrete foundations; and water for concrete installation, dust control, and erosion control. Water is anticipated to be provided by the Goleta Water District and would be delivered to the site via truck.

No sensitive vegetation or habitat, aquatic features, native heritage trees, or cultural resources would be directly impacted by construction, either on site or off site. Sensitive resources would be avoided with the use of exclusion fencing or other appropriate measures.

Estimated quantities of raw materials are summarized in Table 4-3.

Table 4-3. Estimated Raw Construction Material Quantities

Construction Raw Material	Quantity	Unit
Imported soil (for finish grading)	100	Cubic yards
Gravel	3,000	Cubic yards
Engineered fill	350	Cubic yards
Cement	230	Cubic yards
Sand	450	Cubic yards
Steel (Rebar)	33	Tons
Lumber	2	Tons

Battery units would be transported to the Project site on flatbed trailers and placed on foundations using a mobile crane. Construction worker parking and building material staging would occur on site. Table 4-4 summarizes the quantity and operating hours of construction equipment anticipated to be used for each Project activity.

Table 4-4. Construction Equipment by Project Activity

Project Activity	Equipment	Quantity	Daytime Operating Hours
Site Clearing	Dump Truck	1	4
	Excavator	1	8
	Rubber Tired Loader	1	8
	Skid Steer Loader	1	8
	Tractors/Loaders/Backhoe	1	8
	Water Truck	1	8
Site Preparation/Rough Grading	Dump Truck	1	4
	Grader	1	8
	Rubber Tired Loader	1	8
	Skid Steer Loader	1	8
	Tractors/Loaders/Backhoe	1	8
	Water Truck	1	8
Fine/Pad Grading, Excavation for Underground Conduit/Utilities, and Stormwater LID Areas	Grader	1	8
	Plate Compactor	1	8
	Roller	1	8
	Rubber Tired Loader	1	8
	Skid Steer Loader	1	8
	Tractors/Loaders/Backhoe	1	8
Construction of Foundation Pads	Cement and Mortar Mixer	1	8
	Concrete Pump	1	8
	Tractors/Loaders/Backhoe	1	8
	Water Truck	1	8
	Pile Driver ⁴	1	8
BESS Container and Conduit Installation	Air Compressor	1	8
	Mobile Crane	1	8

⁴ Pending detailed design, selected BESS equipment foundations may be installed on piles, as opposed to slab on grade.

Project Activity	Equipment	Quantity	Daytime Operating Hours
Project Substation/Switchyard Gen-Tie Installation	Excavator	1	8
	Generator Set	1	8
	Rough Terrain Forklift	1	8
	Skid Steer Loader	1	8
	Tractors/Loaders/Backhoe	1	8
	Aerial Lift	1	8
	Air Compressor	1	8
	Bore/Drill Rigs	1	8
	Cranes	1	8
	Excavator	1	8
	Generator Set	1	8
	Rough Terrain Forklift	1	8
	Skid Steer Loader	1	8
	Tractors/Loaders/Backhoe	1	8
	Paver	1	8
Paving for Drive Aisles	Roller	1	8
	Cement and Mortar Mixer	1	8
	Tractors/Loaders/Backhoes	1	8
Landscaping, Lighting, Architectural Finishes	Skid Steer	1	8
	Air Compressor	1	8

Estimated vehicle trips, for average daily worker trips, vendor truck trips, and daily haul trips are presented in Table 4-5.

Table 4-5. Vehicle Trips by Project Activity

Project Activity	Average Daily Worker Trips	Average Daily Vendor Truck Trips	Average Daily Haul Trips	Notes
Demolition/Site Clearing	6	0	2	Haul trips include removal of existing brush and debris (2 acres) over 2 days
Site Preparation/Rough Grading	4	0	2	Site anticipated to balance cut/fill quantities
Fine/Pad Grading, Excavation for Underground Conduit/Utilities, and Stormwater LID Areas	4	0	1	Assumes up to 10 truck deliveries (e.g., for imported soil). No other deliveries of project equipment or hauling of material is anticipated.
Construction of Concrete Pads	6			Vendor trips include delivery of concrete
BESS Container and Conduit Installation	7	9	0	Vendor Trips include delivery of 168 Battery Enclosures, 42 PCS, and 42 BESS Transformers (assume one per truck), and conduit - over 15 days
Project Substation/Switchyard Gen-Tie Installation	10	4	0	Vendor Trips include delivery of substation equipment over 30 days
Paving for Drive Aisles	6	4	0	Vendor trips include delivery of asphalt
Landscaping, Lighting, Architectural Finishes	8	4	0	Vendor trips include delivery of landscaping and architectural finishes

4.10.4. Site Access, Security, and Lighting

Roadways used to access the Project site include Viajero Drive, Las Armas Road, Hollister Avenue, Storke Road, and US 101. Secure site access would be provided at two locations: via Hollister Avenue and Viajero Drive to the southeastern corner of the BESS facility and via Hollister Avenue and Las Armas Road to the EGS main gate, to the southwestern corner of the BESS facility, see Figure 4-3.

The Viajero Drive access point would begin at the northern terminus of Viajero Drive southeast corner of the BESS facility.

On the southwestern side, from the existing EGS main gate, vehicles would access the BESS site via a proposed private access easement within the EGS parking area to the western entrance of the BESS facility.

Access improvements would meet Goleta and Santa Barbara County Fire Department requirements for emergency access. Access would be through locked gates, and each gate would have a Knox Box to allow for Fire Department access.

Construction-related equipment and material delivery vehicles and haul trucks, as well as operational inspection vehicles, would use both access points. Construction and operations equipment, and any debris or waste materials, would be staged on site.

Parking for operational inspection and maintenance would be accommodated within two designated spaces within the southeast portion of the BESS perimeter road, near the Viajero Drive entrance. Additional parking would be available on the gravel surfaces inside the BESS perimeter road.

4.10.5. Erosion and Sediment Control and Pollution Prevention

Placement of the BESS components and access improvements would result in a minor increase of impervious surfaces within the Project parcel. The remaining area within the parcel would continue to allow onsite infiltration of rainwater. Construction Best Management Practices would be installed at the outset of construction and would be maintained while the Project site is stabilized.

A Project-specific construction SWPPP has been prepared, and would be implemented, including establishment of Best Management Practices to control potential stormwater runoff during construction.

A detailed hydrological analysis has been completed, and a Project-specific Stormwater Control Plan (see Appendix J) has been prepared to address stormwater control during long-term operations. Based on the hydrological analysis, a site-specific retention basin has been designed to capture excess stormwater runoff during long-term operations. An approximately 2,610 square foot bioretention basin is proposed for stormwater retention on the south edge (downslope portion) of the BESS facility, see Figure 4-3. Additionally, as described in the SWPPP (Appendix K), the 2022 Construction General Permit (CGP) requires that best management practices (BMPs) be implemented. The following BMPs would be implemented: bioretention basin, permeable pavement with underdrain, stabilized construction entrance, and silt fences. Bioretention basin design would meet applicable City design standards and design parameters including the location, depth, width, and materials, as determined by a Drainage Analysis (see Appendix I) and Stormwater Control Plan (see Appendix J).

4.11. Operations and Maintenance

The BESS would operate 24 hours a day, 7 days a week. Once constructed, the BESS facility would be unstaffed except for periodic maintenance checks; therefore, it would generate a minimal amount of traffic. The Project would generate up to 10 vehicle trips per week during the first year of BESS facility operation for equipment inspection and maintenance purposes, however the Project is forecast to generate on average 1 to 2 trips per week during the first year of operation. Vehicle trips may be reduced

after the Project's first year of operation to an average of 1 to 2 trips per month (see Appendix N). This is because the first year of operations typically includes more start up activities such as commissioning and system testing, performance optimization, and the resolution of initial issues. Equipment maintenance activities at the Project site would typically consist of inspections by a technician or for general site and landscape maintenance.

Power dispatch would be managed remotely from a regional control center. After commissioning and during the operational life of the Project, qualified technicians would routinely inspect the BESS and conduct any necessary maintenance to ensure safe operational readiness.

A detailed inspection and maintenance of the BESS would be performed several months after installation and annually, or more often if necessary, following the initial inspection period. More frequent inspections may occur due to unplanned maintenance visits. Inspection trips would originate from the local area.

Maintenance procedures are primarily visual inspections and verifications of proper operations. Annual inspection and maintenance typically encompass a visual inspection of the battery system; replacement of consumable parts as needed (e.g., fans, DC Protections, battery modules, and Battery Management System in later years); adjusting of torque on bolts in modules and racks; and other adjustments.

Unplanned maintenance needs would principally be identified through the operation of the vendor's controller. Certain events would cause event alarms notifying the operator of the need for support. The controller interfaces with the Battery Management System, the power conversion system controller, and the controllers for the various ancillary systems such as fire suppression. In addition to relaying warning signals from each of those systems individually, the controller would alert the operator for events that are not identified individually by any sub-component control system.

Long-term operations would entail no water consumption or air emissions. For security purposes, yard lights would be installed to illuminate the Project site during nighttime hours. This security lighting would be inside the operational area perimeter, shielded and focused inward toward the BESS equipment.

Pending the final design configuration, the primary source of the noise from the BESS is anticipated to be from the power conversion system enclosure ventilation fans and/or battery energy storage enclosure HVAC systems. The batteries and inverters would be fully enclosed. When operating at full power, the ventilation fans and HVAC systems would cycle on and off.

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. Other nearby receptors include the Hideaway residential neighborhood located approximately 300 feet west (west of the EGS and Las Armas Road) and Ellwood Elementary School located approximately 500 feet east. BESS components would be designed to ensure that noise levels conform with development standards of the GMC.

Electricity would be provided by SCE. There are no on-site water wells. Water for landscape irrigation is anticipated to be provided by Goleta Water District. Telecom internet service for system processes and communication would be provided by Cox Communications. Other utilities such as gas and sewer would not be required for the operation and maintenance of the Project.

The stormwater retention basin (bioswale) would be maintained in accordance with a Stormwater Facilities Operations and Maintenance Plan, in order to ensure that the basin functions properly.

4.11.1. Fire Safety

The BESS would be designed and operated in accordance with applicable industry best practices for fire safety, including applicable National Fire Protection Association (NFPA) standards. The Megapack 2 XL system is designed to comply with major installation codes for energy storage systems, including NFPA

855, IFC 2018 and 2021, and NEC 2020. Additionally, the Megapack 2XL is listed to the following standards by OSHA-recognized Testing Laboratories (Tesla, 2022):

- UL 1642 (cell-level certification)
- UL 1973 and IEC 62619 (battery module-level certification)
- UL 9540, IEC 62933-5-2, IEC 62109-1 (system-level certification)
- UL 1741, CSA C22.2 #107.1 (power electronics)
- UL 1998 and IEC 60730 Annex H (functional safety of software)
- IEC 61000-6-2, and EN 55011 (EMC)
- UN 38.3 (transportation, self-certified)
- IEEE 693 (seismic safety)
- UL 9540A (large-scale firetesting): Tested at the cell, module, and unit level
- And many more, including compliance to major market grid codes

The BESS would be comprised of approximately 36 modular Megapack units, each consisting of up to 24 lithium iron phosphate (LFP) battery modules. Battery energy storage unit enclosures would include gas igniters and overpressure vents to ignite and release any flammable gasses through the top of the unit; this design feature will prevent an explosion due to a thermal runaway event. Testing of the lithium iron phosphate chemistry has demonstrated a strong ability to resist thermal runaway and has shown controlled venting in worst case events, without explosive bursts or fire, and that the Megapack battery modules are resistant to multiple co-located cells sent into runaway at the same time. Safety and reliability systems would also include voltage and current protection via software controls and physical protection via component isolation (Tesla, 2022).

The Applicant would work closely with Goleta and Santa Barbara County Fire Department to ensure appropriate fire prevention equipment and response procedures are in place. Specifically, the Santa Barbara County Fire Department requested that the site must have a Fire Response Plan in place before operation. In addition to the Fire Response Plan, Scale Microgrids, LLC has committed to providing training to Santa Barbara County Fire Department fire fighters and first responders that is specific to the Project site and system configuration. This would be with materials provided by Tesla (or the chosen battery manufacturer), including but not limited to the periodically updated Emergency Response Guide (Tesla, 2024) or their Industrial Energy Emergency Response Video⁵. A point of contact would be designated for emergency responders to contact in case of emergency or concerns.

Additional emergency response capability is available from local fire and emergency response services. Goleta currently has three fire stations with another one in the project phase. The City partners with the Santa Barbara County Fire Department. Santa Barbara County Fire Department Station 11 is located approximately 2 miles to the southeast of the Project site, at 6901 Frey Way, near the intersection of Hollister Avenue and Storke Road in Goleta. Response time to the Project site is 5 to 7 minutes. A new fire station (Station 10) is planned to be constructed at 7952 Hollister Avenue, across the street from Sandpiper Golf Club and adjacent to the Hideaway residential development, approximately 0.4 miles from the Project site's EGS entrance, and approximately 0.5 miles from the Project site's Viajero Drive entrance.

4.12. Project Decommissioning

Decommissioning of the Project at the end of its useful life would include removal of battery units from the foundations, disconnection of wiring, and transport of the battery units to an approved recycling facility. It is conservatively assumed that Project decommissioning will occur in 2050. Activities associated with decommissioning are similar to construction activities, but they are done in reverse. A detailed

⁵ <https://www.tesla.com/firstresponders/industrial-energy-emergency-response-video>

Decommissioning Plan would be prepared and submitted to the City, prior to BESS facility installation. The City may ask for bonds that are updated periodically to keep up with current costs.

4.13. Permits and Approvals

In addition to the Development Plan (DP) and Conditional Use Permit (CUP), the Project requires approval of a General Plan Amendment (GPA) and Rezone (RZ) from C-CG to I-OI as shared above. The City Council will be the decisionmaker for all the project components (discretionary and legislative).

If the DP and CUP application is approved, administrative clearances (i.e., Zoning Clearance, building permit, grading permit, electrical permit, fire permit) would be needed

Table 4-6 lists the regulatory permits, approvals, and reviews that are anticipated for the Project.

Table 4-6. Permits and Approvals that may be required for the Project

Agency	Permit, Approval, or Exemption
City of Goleta – GPA	General Plan Amendment (application filed 11 April 2024)
City of Goleta – Design Review	- Conceptual Design Review (meeting held on 14 May 2024) - Preliminary Design Review - Final Design Review
City of Goleta – Rezone, CUP, and DP	- Rezone - Major Conditional Use Permit per Zoning Ordinance Section 17.09.020 - Development Plan per Zoning Ordinance Section 17.59.020 - California Environmental Quality Act review
City of Goleta – Ministerial Permits	- Zoning Clearance - Grading Plan - Building permit - Electrical permit - Fire permit - Other ministerial permits and compliance plan reviews
Central Coast Regional Water Quality Control Board and State Water Resources Control Board – CUP and DP application only	Coverage under the Construction General Permit, with a Stormwater Pollution Prevention Plan
Santa Barbara County Fire Department – CUP and DP application only	Fire Safety Review
Santa Barbara County Environmental Health – CUP and DP application only	Certified Unified Program Agency review, Hazardous Materials Business Plan review

4.14. Alternatives

The purpose of an alternatives analysis under CEQA is to identify options that would feasibly attain the Project's objectives while reducing the significant environmental impacts resulting from the Project. CEQA does not require the inclusion of an alternatives analysis in a mitigated negative declaration (MND) because the Initial Study (IS) concludes that, with incorporation of any mitigation measures required, there would be no significant adverse impacts resulting from the Project (CEQA Guidelines Sections 15063(d) and 15071). Therefore, no alternatives analysis is provided in the Initial Study.

5. ENVIRONMENTAL ANALYSIS

Section 5 identifies the environmental impacts of the proposed Project. It also presents and applies criteria used to determine whether an adverse impact is significant under CEQA and describes feasible mitigation measures which reduce each significant adverse impact to a level of less than significant.

The significance criteria used in this analysis are established by the CEQA Guidelines, Appendix G, which are presented in the summary tables at the beginning of each issue area subsection in Section 5. Where indicated, some issue areas are also subject to the guidelines in the County of Santa Barbara's Environmental Thresholds and Guidelines Manual, which have been adopted by the City of Goleta. In 2008, the City adopted the County's 2002 Environmental Threshold and Guideline Manual (published May 1992 and revised in October 2002). Since adoption by the City, the City has revised the Environmental Threshold and Guidelines Manual multiple times to reflect changes to the State's CEQA Guidelines. For consistency with current CEQA requirements, the analysis in this MND relies on the most current County Environmental Thresholds and Guideline Manual published in January 2021.

5.1. Aesthetics

AESTHETICS				
Except as provided in Public Resources Code Section 21099, would the project:				
	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a) Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
(b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
(c) In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
(d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

Significance criteria established by CEQA Guidelines, Appendix G and County of Santa Barbara's Environmental Thresholds and Guidelines Manual, which have been adopted by the City of Goleta.

5.1.1. Setting

Aesthetics, as addressed in the California Environmental Quality Act (CEQA), refers to visual considerations in the physical environment. Aesthetics analysis, or visual resource analysis, is a systematic process to logically assess visible change in the physical environment and the anticipated viewer response to that change. The Aesthetics section of this IS/MND describes the existing landscape character of the Project site, existing views of the Project site from various on-the-ground vantage points, the visual characteristics of the proposed Project, and the landscape changes that would be associated with the construction, operation, and decommissioning of the Greenbark 30 Battery Energy Storage Project (the proposed Project), as seen from various vantage points.

When viewing the same landscape, people may have different responses to that landscape and any proposed visual changes, based upon their values, familiarity, concern, or expectations for that landscape and its scenic quality. Because each person's attachment to and value for a particular landscape is unique, visual changes to that landscape inherently affect viewers differently. However, generalizations can be made about viewer's sensitivity to scenic quality and visual changes. Recreationists, hikers, equestrians,

tourists and people driving for pleasure are expected to have high concern for scenery, visual quality, and landscape character. People who are commuting daily through the same landscape generally have a moderate concern for scenery, while people working at agricultural or industrial sites generally have a lower concern for scenic quality or changes to existing landscape character. The visual sensitivity of a landscape is affected by the viewing distances at which it is seen, such as close-up or far away. The visual sensitivity of a landscape also is affected by the travel speed at which a person is viewing the landscape (high speeds on a highway, low speeds on a hiking trail, or stationary at a residence).

Distance zones are delineated as immediate foreground, foreground, middleground, and background (USDA Forest Service, 1995). When a viewer is closer in proximity to a viewed object in the landscape, more detail can be seen and there is greater potential influence of that object on visual quality because of its form or scale (relative size of the object in relation to the viewer). When the same landscape feature is viewed at background distances, details may be imperceptible but overall forms of terrain and vegetation are evident, and the horizon and skyline are dominant. In the middleground, some detail is evident (like the foreground) and landscape elements are seen in context with landforms and vegetation patterns (like the background). For this analysis, four viewing distances were considered:

- Immediate Foreground (from the viewer to approximately 300 feet away)
- Foreground (approximately 300 feet to 0.5 miles away)
- Middleground (approximately between 0.5 and 4 miles away)
- Background (approximately four miles to the horizon)

Visual Inventory Methodology

Visual resources of the Project site were investigated based on the following criteria: (1) existing visual quality and scenic attributes of the landscape; (2) location of sensitive receptors in the landscape; (3) assumptions about receptors' concern for scenery and sensitivity to changes in the landscape; (4) the magnitude of visual changes in the landscape that would be brought about by implementation, construction, and operation of the proposed Project; and, (5) compliance with State, County and local policies for visual resources.

The visual setting is described in terms of the existing *landscape character and visual quality* of the viewshed. Existing landscape character is an overall visual and cultural impression of landscape attributes — the physical appearance and cultural context of a landscape that gives it an identity and sense of place. Existing landscape character is determined by landforms, vegetation patterns, waterbodies, and cultural features. Visual quality is a judgment of a landscape's attractiveness, as determined by attributes broadly recognized as being valued and preferred by most viewers. Visual quality is expressed as a range of valued landscape attributes, often described in terms such as form, line, color, and texture. Combinations of these factors lead to evaluations of landscape character and visual quality, such as:

- High – a landscape of exceptional quality and beauty, valued for its scenic attributes.
- Moderate – a landscape that is common or average within the landscape character type.
- Low – a landscape that is lacking in scenic features.

The existing landscape setting and its viewers are characterized in terms of their overall visual sensitivity. Visual sensitivity consists of three components: viewer exposure, viewer concern, and visual quality. Viewer exposure affects a landscape's overall visual sensitivity. Landscapes that have very low viewer exposure (based on landscape visibility, the viewing distance, the number of people who view the landscape, or the duration of time that the landscape can be viewed) would tend to be less sensitive to overall visual change in the context of human experience of visual impacts.

Evaluations of existing landscape character and visual quality, combined with ratings of overall visual sensitivity, establishes the visual inventory methodology.

Key observation points (KOPs) generally are identified to represent the most critical viewing locations and the viewer groups likely to be affected by a project. As shown in Appendix C, six KOPs were identified to assess visual impacts. In addition, a view from a drone is used to show the existing site and proposed layout. Assessments of visual impacts are determined from the six ground-level KOPs. In the impact analysis, overall visual sensitivity is considered in combination with the level of visual change introduced by a project, as seen from a KOP, to arrive at preliminary findings of potential project impact significance. In this analysis impacts to foreseeable future viewers, such as residents of new and currently un-built subdivisions, were also analyzed to support the evaluation of cumulative impacts.

Existing Landscape Setting and Viewer Characteristics

This section discusses the existing visual character of the region, existing visual quality in the Project site and immediate surroundings; viewer concern, and viewer exposure to the proposed Project, leading to a rating of overall visual sensitivity. Also discussed are the existing sources of light and glare within the Project site and immediate surroundings.

Regional Context. The proposed Project would be located on an existing vacant undeveloped property in an urbanized area of the City of Goleta in Santa Barbara County. The site is located at the end of a surface street. The Project vicinity is highly developed. The Ellwood Generating Station (EGS) and co-located SCE substation are to the west, with Las Armas Road and the Hideaway residential neighborhood beyond; the Union Pacific Railroad (UPRR) is to the north, with U.S. Interstate Highway 101 (US 101) and residential neighborhoods just beyond; to the east is a commercial parking lot with Ellwood Elementary School beyond; the Mariposa at Ellwood Shores elder care facility is to the southeast; and a vacant commercial parking lot is adjacent to the south side of the Project site, with Hollister Avenue just beyond. The Project site and adjacent parcels to the east, south, and southeast are zone General Commercial (CG), while the EGS parcel to the west and the elementary school to the east are zoned Public or Quasi Public. The Hideaway residential neighborhood is zoned Planned Residential.

The land use in the area is a mix of General Commercial, Planned, Community, Single-Family Residential, and Recreation, Public/Quasi Public. The proposed Project site is not located in an area designated as a protected scenic resource and is therefore not subject to scenic protection standards. The proposed site is located near an officially designated eligible Scenic Highway, US 101 to the north, and a designated Local Scenic Corridor (Hollister Avenue) to the south (Caltrans, 2025; City of Goleta, 2006).

Project Viewshed and Key Observation Points. Views of the proposed Project are limited by its location behind existing industrial developments, buildings, and vegetation. The closest residential community – the Mariposa at Ellwood Shores elder care facility – is approximately 200 feet to the southeast. The Project would not be visible from this location due to the existing vegetation, proposed landscaping, and perimeter screening. Trees on the site would remain except where need to be removed to accommodate safe access.

As shown in Appendix C, photos from KOPs are used to provide images of existing conditions and digital renderings of what the BESS would look like when viewed from each KOP (ERM, 2025 – Appendix C). Of the six KOPs, no change would be visible from KOPs 1, 3, 4, and 6 owing to vegetation and structures between the KOP and the Project. Viewers at KOP 2 would see a new fence and gate, and KOP 5 would have a view of the site as seen from the berm along the UPRR tracks. However, KOP 5 is not a site routinely visited by the public, as it is not adjacent to a road or walkway. Appendix C also includes a drone-based image of the vacant site and the site with the Project in place. This view is not representative of a view available from the ground.

Viewer Concern and Sensitivity to Visual Change. Viewer concerns regarding the observed landscape are shaped by expectations of what the viewer will experience and by existing conditions. The Project site is

currently vacant and not in use. As well, the surroundings on the south, east, and west sides of the site consist of a densely built environment. At the norther edge of the site is the UPRR with areas of dense vegetation between the UPRR and US 101. The railroad is at a similar elevation to the site, with the highway approximately 10-15 feet higher in elevation. Motorists on Highway 101 would have limited brief views of the site because of existing vegetation, the speed of traffic, and the elevation difference between the highway and the site. The residential community north of the highway has very limited views of the site due to existing vegetation and the distance to the site. The elder care facility to the southeast, along with the residential neighborhood to the west are the closest sensitive receptors to the site. The neighborhood to the west is separated from the site by the existing EGS and vegetation, and potential views of the Project site are blocked by the generating station and vegetation. From the south, views of the Project site are screened by existing vegetation aligning the northern boundary of the vacant, unused parking lot south of the site. There are no transmission poles currently at the site, and none are proposed to be installed. The tallest component would be approximately 10 feet above ground surface, although pending detailed design, some components may exceed 10 feet. The visual change due to the Project would be visible to a limited number of people, mostly people who live in the four houses fronting Las Amas Road, whose views would be largely screened by the EGS and existing mature vegetation. Views from Hollister Avenue are screened by existing mature vegetation along the road and along the southern boundary of the site. Portions of the site may be visible from some second story level windows in the elder care facility's north and west sides, but would be mostly screened by existing mature vegetation..

The limited views of the site would be consistent with viewer expectations – not perceiving a noteworthy change - given the industrial nature of the adjacent EGS facility and the extensive mature vegetation screening of the site from off-site viewers.

5.1.2. Regulatory Background

This section includes a description of the aesthetic resources' regulatory framework. There are no federal or state regulations or policies related to aesthetic resources applicable to the Project.

Local

City of Goleta General Plan. The City's land use policies – depicted below as General Plan Law Requirements (GP) and/or Coastal Act Requirements (CP) and promulgated from the Visual and Historical Resources Element – aim to preserve and protect Goleta's scenic and historic resources to the maximum extent feasible while allowing quality development in conformance with the provisions of the General Plan. The following policies in the General Plan generally relate to the proposed Project (City of Goleta, 2006b):

- **VH 1.5 Protection of Open Space Views. [GP/CP]** Views of open space, including agricultural lands, from public areas shall be protected. View protection associated with development should be accomplished first through site selection and then by use of design alternatives that enhance rather than obstruct or degrade such views. To minimize impacts to these scenic resources, the following development practices shall be used, where appropriate:
 - a. Limitations on the height and size of structures.
 - b. Clustering of building sites and structures.
 - c. Shared vehicular access to minimize curb cuts.
 - d. Downcast, fully shielded, full cut off lighting of the minimum intensity needed for the purpose.
 - e. Use of landscaping for screening purposes and/or minimizing view blockage as applicable.
 - f. Selection of colors and materials that harmonize with the surrounding landscape.

- **VH 2.1 Designated Scenic Corridors. [GP]** The Scenic Resources Map in Figure 6-1 (of General Plan/Coastal Land Use Plan Section 6.0 Visual and Historic Resources Element) identifies corridors that pass through, or provide visual access to, areas of high scenic value. These corridors, or segments of corridors, include but are not limited to the following:
 - a. US 101.
 - b. Cathedral Oaks Road.
 - c. Hollister Avenue.
 - d. Los Carneros Road.
 - e. Fairview Avenue.
 - f. Calle Real.
- **VH 2.2 Preservation of Scenic Corridors. [GP]** The aesthetic qualities of scenic corridors shall be preserved through retention of the general character of significant natural features; views of the ocean, foothills, and mountainous areas; and open space associated with recreational and agricultural areas including orchards, prominent vegetation, and historic structures. If landscaping is used to add visual interest or for screening, care should be taken to prevent a wall-like appearance. Bridges, culverts, drainage ditches and other roadway ancillary elements should be appropriately designed; side slopes and earthen berms adjacent to roadways should be natural in appearance.
- **VH 2.3 Development Projects Along Scenic Corridors. [GP]** Development adjacent to scenic corridors should not degrade or obstruct views of scenic areas. To ensure visual compatibility with the scenic qualities, the following practices shall be used, where appropriate:
 - a. Incorporate natural features in design.
 - b. Use landscaping for screening purposes and/or for minimizing view blockage as applicable.
 - c. Minimize vegetation removal.
 - d. Limit the height and size of structures.
 - e. Cluster building sites and structures.
 - f. Limit grading for development including structures, access roads, and driveways. Minimize the length of access roads and driveways and follow the natural contour of the land.
 - g. Preserve historical structures or sites.
 - h. Plant and preserve trees.
 - i. Minimize use of signage.
 - j. Provide site-specific visual assessments, including use of story poles.
 - k. Provide a similar level of architectural detail on all elevations visible from scenic corridors.
 - l. Place existing overhead utilities and all new utilities underground.
 - m. Establish setbacks along major roadways to help protect views and create an attractive scenic corridor. On flat sites, step the heights of buildings so that the height of building elements is lower close to the street and increases with distance from the street
- **VH 3.3 Site Design. [GP]** The city's visual character shall be enhanced through appropriate site design. Site plans shall provide for buildings, structures, and uses that are subordinate to the natural topography, existing vegetation, and drainage courses; adequate landscaping; adequate vehicular circulation and parking; adequate pedestrian circulation; and provision and/or maintenance of solar access.
- **VH 4.6 Industrial Areas. [GP]** The following standards shall be applicable to industrial development (see related LU 4.2):
 - a. All structures shall be designed to be compatible with adjacent development relative to size, bulk, and scale.

- b. Where residential or commercial uses exist adjacent to industrial properties, such areas shall be buffered from industrial uses by increased setbacks and heavily landscaped screens
 - c. Transfer of noise off-site shall be minimized by the use of screen walls, acoustical enclosures, or building placement. Noise generating activities shall be located as far as possible from nonindustrial uses.
 - d. All outdoor storage or maintenance areas shall be screened. Landscaping may be used alone or in conjunction with fencing or walls.
 - e. Loading areas and recycling and trash facilities shall be easily accessed and screened from view with landscaping and/or fencing or walls. Adjacent uses shall be considered when siting such areas.
 - f. Roof-mounted equipment shall be screened and considered as part of the structure for height calculations.
 - g. Architectural detailing shall be used to break up the box-like appearance of construction typically used for industrial buildings.
 - h. Adequate lighting shall be provided for security and safety purposes but designed to prevent encroachment onto adjacent uses, wildlife habitats, or the night sky.
 - i. Sufficient, secure, and protected bicycle parking shall be provided.
 - j. Public transit shall be encouraged through effective placement of stops for local and regional transit services. Existing stops shall be upgraded as appropriate.
- **VH 4.9 Landscape Design. [GP]** Landscaping shall be considered and designed as an integral part of development, not relegated to remaining portions of a site following placement of buildings, parking, or vehicular access. Landscaping shall conform to the following standards:
- a. Landscaping that conforms to the natural topography and protects existing specimen trees is encouraged.
 - b. Any specimen trees removed shall be replaced with a similar size tree or with a tree deemed appropriate by the City.
 - c. Landscaping shall emphasize the use of native and drought-tolerant vegetation and should include a range and density of plantings including trees, shrubs, groundcover, and vines of various heights and species.
 - d. The use of invasive plants shall be prohibited.
 - e. Landscaping shall be incorporated into the design to soften building masses, reinforce pedestrian scale, and provide screening along public streets and offstreet parking areas.
- **VH 4.12 Lighting. [GP]** Outdoor lighting fixtures shall be designed, located, aimed downward or toward structures (if properly shielded), retrofitted if feasible, and maintained in order to prevent over-lighting, energy waste, glare, light trespass, and sky glow. The following standards shall apply:
- a. Outdoor lighting shall be the minimum number of fixtures and intensity needed for the intended purpose. Fixtures shall be fully shielded and have full cut off lights to minimize visibility from public viewing areas and prevent light pollution into residential areas or other sensitive uses such as wildlife habitats or migration routes.
 - b. Direct upward light emission shall be avoided to protect views of the night sky.
 - c. Light fixtures used in new development shall be appropriate to the architectural style and scale and compatible with the surrounding area.

- **VH 4.14 Utilities. [GP]** New development projects shall be required to place new utility lines underground. Existing overhead utility lines should be placed underground when feasible. Undergrounding of utility hardware is encouraged. Any aboveground utility hardware, such as water meters, electrical transformers, or backflow devices, shall not inhibit line of sight or encroach into public walkways and, where feasible, should be screened from public view by methods including, but not limited to, appropriate paint color, landscaping, and/or walls.

5.1.3. Environmental Impacts and Mitigation Measures

Visual Impact Assessment Methodology

This visual analysis used the Visual Sensitivity/Visual Change (VS/VC) methodology to assess the visual effects of the proposed Project on existing landscapes. The VS/VC methodology includes a characterization of the visual sensitivity of existing landscapes, the characteristics of existing visual changes occurring and apparent in the landscape, and the characteristics of the proposed Project.

Following professionally accepted practice in visual analysis, visual sensitivity consists of three components: visual quality, viewer concern, and viewer exposure. The description of visual quality notes the existing built structures and natural landscape features that contribute to overall visual quality. Viewer concern can be described as the personal expectations for the landscape that are held by the viewing public. Viewer concern is often reflected in public policy documents that identify landscapes of special concern or roadways with special scenic status, e.g., scenic highways. Viewer exposure also affects a landscape's overall visual sensitivity. Landscapes that have very low viewer exposure, based on landscape visibility, viewing distance, number of people who view the landscape, or duration of time that the landscape can be viewed, will tend to be less sensitive to overall visual change in the context of human experience of visual impacts. Landscapes with higher viewer exposure are more sensitive to overall visual changes. Overall visual sensitivity is rated on a scale from Low to Moderate to High. Based on the flat topography at and around the site, the distance between the site and residences and roadways, and the presence of mature vegetation screening the site, visual sensitivity is considered to be low to moderate.

Project-induced visual change could result from aboveground facilities, vegetation removal, landform modification, component size or scale relative to existing landscape characteristics, and the placement of Project components relative to developed features. The experience of visual change can also be affected by the degree of available screening by vegetation, landforms, and/or structures; distance from the observers; atmospheric conditions; and angle of view. Visual change describes the degree of actual visible change expected as a result of the Project. The fundamental elements of visual change include visual contrast, visual dominance, and scenic view obstruction. Visual contrast refers to visual discrepancies of form, line, color or texture of the project against the existing landscape. Visual dominance refers to the degree to which this contrast would demand the attention of casual viewers. Scenic view obstruction refers to the degree to which the project would block or intrude upon scenic view corridors, particularly those identified in public policies. Overall visual change is rated on a scale of Low to Moderate to High. As with visual sensitivity, overall visual change is ranked as low to moderate owing to how the site is screened by existing structures and vegetation, making the changes visible from only a few locations. In addition, the Project would be adjacent to an existing generation station, a parking lot, and a rail line. The visible change at the site would be consistent with the built features surrounding it.

In addition, the project is evaluated for conformance with applicable local plans and policies. Adopted expressions of local public policy pertaining to visual resources are given great weight in determining both visual quality and viewer concern.

The determination of which aesthetic changes cross a threshold of "substantial adverse effect" or degradation is based upon the criteria described in the methodology summary (above) and in Table 5.1-1,

Visual Impact Significance Criteria. This table was used primarily as a consistency check, as determinations of visual sensitivity and visual change were based primarily on analyst experience and site-specific circumstances.

Implicit in this rating methodology is the acknowledgment that for a visual impact to be considered significant two conditions generally exist: (1) the existing landscape is of reasonably high quality and is relatively valued by viewers; and (2) the perceived incompatibility of one or more elements or characteristics of the project tends toward the high extreme, leading to a substantial reduction in visual quality.

Based on existing conditions at and surrounding the site and the proposed changes in the visual environment, the Visual Sensitivity is judged to be Low to Moderate. This is because the site is largely not visible because of the flat terrain, extensive mature vegetation, and separation of the site from residences and roads. Visual change would be Low to Moderate because the new installed equipment would be low profile and would be below the height of surrounding buildings, such as the EGS, and the existing vegetation.

Table 5.1-1. Visual Impact Significance Criteria

Visual Sensitivity	Visual Change				
	Low	Low to Moderate	Moderate	Moderate to High	High
Low	No impact ¹	No impact	Less Than Significant ²	Less Than Significant	Less Than Significant
Low to Moderate	No impact	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant with Mitigation Incorporated ³
Moderate	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant with Mitigation Incorporated	Less Than Significant with Mitigation Incorporated
Moderate to High	Less Than Significant	Less Than Significant	Less Than Significant with Mitigation Incorporated	Less Than Significant with Mitigation Incorporated	Potentially Significant Impact ⁴
High	Less Than Significant	Less Than Significant with Mitigation Incorporated	Less Than Significant with Mitigation Incorporated	Potentially Significant Impact ⁴	Potentially Significant Impact

1 No Impact – Impacts may or may not be perceptible but are considered minor in the context of existing landscape characteristics and view opportunity.

2 Less Than Significant – Impacts are perceived as negative but do not exceed environmental thresholds.

3 Less Than Significant with Mitigation Incorporated – Impacts are perceived as negative and may exceed environmental thresholds depending on project and site-specific circumstances but are Less Than Significant with mitigation incorporated.

4 Potentially Significant Impact – Impacts with feasible mitigation may be reduced to levels that are not significant or avoided all together. Without mitigation, significant impacts would exceed environmental thresholds.

Project Visual Elements

The Project proposes installing 10-foot tall BESS units within the central portion of a flat 2.1-acre vacant parcel. The Project would include a minimum 15-foot setback along the east, north, and west boundaries. A 50-foot setback along the southern boundary would provide a buffer between the developed features and the existing seasonal wetland feature located along the southern site boundary. A stormwater detention basin is proposed to be constructed on the south edge (downslope portion) of the BESS facility.

The only vertical elements of the facility would be the BESS containers and the surrounding site fencing and gates. Landscape visual screening is proposed along the northern, southern, and eastern boundaries. Because of the existing vegetation and trees along the western boundary between the proposed BESS facility and the EGS/SCE facility, the project proposes to install ground level landscaping features along that boundary line.

Thresholds of Significance

A significant impact would be expected to occur if the proposed project resulted in any of the impacts noted in the above environmental checklist. Additional aesthetic thresholds of significance are contained 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). The Guidelines Manual thresholds are listed below:

Threshold AES-1. Does the project site have significant visual resources by virtue of surface waters, vegetation, elevation, slope or other natural or man-made features which are publicly visible? If so, does the project have the potential to degrade or significantly interfere with the public's enjoyment of the site's existing visual resources?

Threshold AES-2. Does the project have the potential to impact visual resources of the Coastal Zone or other visually important area (i.e., mountainous area, public park, urban fringe, or scenic travel corridor)? If so, does the project have the potential to conflict with the policies set forth in the Local Coastal Plan, the Comprehensive Plan or any applicable community plan to protect the identified views?

Threshold AES-3. Does the project have the potential to create a significantly adverse aesthetic impact through obstruction of public views, incompatibility with surrounding uses, structures, or intensity of development, removal of significant amounts of vegetation, loss of important open space, substantial alteration of natural character, lack of adequate landscaping, or extensive grading visible from public areas?

Impact Analysis

Thresholds AES-1 and AES-2 are analyzed in Checklist Items (a) and (b) and Threshold AES-3 is addressed in Checklist item (c).

(a) Would the project have a substantial adverse effect on a scenic vista?

NO IMPACT. The flat topography and developed character of this part of the City of Goleta does not provide scenic vistas, which typically are views of open spaces or views of the Pacific Ocean. The nearest mountains or areas of high elevation that would provide panoramic views that could include the Project site are over a mile away. Views from these locations would overlook the highly developed urban landscape, within which the BESS facility would be indiscernible. The Project site does not have significant visual resources that are publicly visible, and it does not have any natural features that would be considered to be a scenic resource. Development of the site would be screened by existing mature vegetation supplemented by additional landscaping, with no visual effect on a scenic vista. The Project would therefore result in no impact to a scenic vista.

(b) Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

NO IMPACT. The proposed Project would require limited site grading and limited tree removal. The nearest State Scenic Highway is US 101, located approximately 300 feet to the north, measured from the roadway's centerline. A locally designated scenic corridor, Hollister Avenue, is approximately 370 feet to the south of the project site. The Project site is not visible from these scenic highways due to existing vegetation and distance, or from any historic buildings. Additionally, as depicted on Figure 6-1 *Scenic and*

Visual Resources in the city's General Plan Visual and Historic Resources Element, the site is not designated as being an area that contains views either in one or all directions from a scenic corridor. As described above, the Project does not have any natural features that would be considered to be a scenic resource. Based on these conditions, there would be no impacts on scenic resources within a state scenic highway.

(c) In nonurbanized areas, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

LESS THAN SIGNIFICANT. The Project is located in an urbanized area with primarily public/quasi-public land uses (Ellwood Elementary School and Ellwood Generating Station), general commercial land uses (Mariposa at Ellwood Shores elder care facility) and some residential land uses, as defined in the City of Goleta General Plan. The proposed Project, including the landscape visual screening, would be compatible with surrounding land uses.

During construction and decommissioning, equipment and vehicles to and from the site would be noticeable to the nearby businesses, residences, and persons using local roads, but this would be consistent with typical road use in the area. As well, construction activities would be temporary and would cease upon completion of the proposed BESS and associated facilities. Similarly, decommissioning activities would be temporary and would cease upon the completion of the decommissioning of the Project. There would not be excessive grading.

Currently, the site is vacant land with trees at its edges, and the portion of the site occupied by the BESS would be covered in gravel, with concrete pads for the BESS units. The 66 kV interconnection to the adjacent SCE substation would be placed underground and would not be visible. Existing trees would remain except where trees need to be removed to accommodate safe access. Pending detailed design and fire safety review, the eucalyptus trees along the western perimeter of the Project site parcel may need to be pruned or removed. This pruning or removal of trees would change the Project site but would not be a significant visual change within the overall landscape, or a substantial alteration of the natural character, due to the urbanized character of the area.

As discussed in Section 4.9, landscape visual screening is proposed along the southern, northern, and eastern perimeters of the BESS facility, and ground level landscaping is proposed on the western perimeter that would be appropriate for the Project site and consistent with the City of Goleta's urban design standards. Landscape plantings would include a mix of commonly used California native landscape screening species, such as Santa Cruz Island Ironwood, Holly Leaf Cherry, Western Redbud, Pacific wax myrtle, Lemonade Berry, Toyon, Pink-flowering Currant, Mugwort, and ground-level vegetation such as thin grass. The combined landscape coverage would be approximately 0.3 acres, exceeding the 10 percent minimum lot coverage specification in the IO zone district standards. Additionally, the proposed Project would be subject to the condition of approval AES1, listed below, which requires approval of the site plan by the City's Design Review Board, which would ensure that the Project design is consistent with the existing neighborhood character.

The proposed Project would be consistent, upon approval of the zone change and General Plan Land Use Designation change, with applicable zoning, regulations and the applicable policies of the City of Goleta General Plan, as noted in Section 5.1.1 and in Section 5.11 (Land Use); thus, the impact would be less than significant.

(d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

LESS THAN SIGNIFICANT. Construction and decommissioning would occur during daylight hours, from approximately 8:00 a.m. to 5:00 p.m. and is not anticipated to include nighttime work that would necessitate the use of lighting within work areas.

Once constructed, the surfaces of new structures and enclosures would be non-reflective and would not create glare. There is no existing nighttime lighting at the site. The adjacent properties – including the Ellwood Generating Station and SCE substation, parking lot to the east, and the elder care facility – have existing night lighting.

For safety and security, low level lighting would be installed at the gates and at strategic locations around the facility. Consistent with the condition of approval, AES2 listed below, all Project lighting would be shielded and directed downward to minimize the potential for glare or spillover onto adjacent properties. The lighting would conform to National Electric Safety Code (NESC) requirements and all applicable City of Goleta outdoor lighting standards. The new lighting would be minimal and would not adversely affect the day or nighttime views in the area; therefore, the impact would be less than significant.

5.1.3.1. Impact Conclusions and Mitigation Measures

The proposed Project would not result in significant aesthetic impacts, and thus, no mitigation measures are recommended.

The following standard conditions of approval regarding design review of the proposed structures, landscaping, lighting, etc. will be applied to the project to ensure compliance with City's aesthetic/design standards:

AES1. Recommended Condition of Approval: Design Review. Prior to the issuance of building permits, the Applicant/Permittee must secure Design Review Board (DRB) final approval of the site plan, architectural style, colors and materials of the project that ensure compatibility of massing, heights, landscaping, lighting, and architectural consistency with the existing neighborhood character.

Timing: Before applying for building permits, the Applicant/Permittee must apply for design approval from the DRB and submit plans wherein the massing, height, landscaping, lighting, and architectural style of all proposed energy storage project equipment is consistent with neighborhood land uses and buildings and do not detract from existing neighborhood character.

Monitoring/Reporting Party(ies): The Planning and Environmental Review Director, or designee, must conduct a final review of the final plans before the City issues a grading permit. If the final plans are not in substantial conformance with the approved plans, the Planning and Environmental Review Director may refer the matter back to the full DRB for a final determination. The Applicant/Permittee shall also demonstrate to PER compliance monitoring staff that the project has been built consistent with approved DRB design and landscape plans prior to Final Building Inspection Clearance.

AES2. Recommended Condition of Approval: Lighting Specifications. Any exterior lighting installed on the project site must be consistent with the City of Goleta's outdoor lighting standards (consistent with General Plan Policy VH 4.12, and City of Goleta Code of Ordinances Chapter 17.35, as listed below:

- (a) low intensity;
- (b) low glare design;
- (c) be hooded to direct light downward onto the subject parcel and prevent spill-over onto adjacent parcels;
- (d) otherwise meet dark sky requirements.

Exterior lighting fixtures must be kept to the minimum lighting level and intensity needed to ensure public safety. These lights must be dimmed after 11 PM to the maximum extent practical without compromising public safety as determined by the Planning and Environmental Review Director. Lighting fixtures must be appropriate for the architectural style of the structure and surrounding area. The final lighting plan must be amended to include identification of all types, sizes, and intensities of wall mounted building lights and landscape accent lighting and a photometric map must be provided. “Moonlighting” type fixtures that illuminate entire tree canopies should also be avoided.

5.2. Agriculture and Forestry Resources

AGRICULTURE AND FORESTRY RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. **Would the project:**

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a) Convert Prime Farmland, Unique Farmland, or Farmland of State-wide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
(b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
(c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	☐	☐	☐	☒
(d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
(e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

Significance criteria established by CEQA Guidelines, Appendix G.

5.2.1. Setting

The proposed Project is located in a developed area with no agricultural activity or forestry resources at or near the site. The Project site parcel and adjacent parcels to the east, south, and southeast are zoned General Commercial (CG) and other parcels in the vicinity are zoned as Public/Quasi Public (PQ), Planned Residential (RP), Single Family Residential (RS), and Open Space/Passive Recreation (OSPR) (City of Goleta, 2025). All adjacent parcels are designated as Urban and Built-Up Land under the California Department of Conservation (DOC) Farmland Mapping and Monitoring Program (FMMP) (DOC, 2022). The Applicant is requesting a rezone of the subject parcel from CG to Office Institutional (OI). The Project site parcel does not have a Williamson Act contract (DOC, 2024).

5.2.2. Regulatory Background

State

Farmland Mapping and Monitoring Program (FMMP). The DOC established the FMMP in 1982 to assess the location, quantity, and quality of agricultural lands and conversion of these lands to other uses. Every even-numbered year, FMMP issues a Farmland Conversion Report. FMMP data are used in elements of

some county and city general plans, in regional studies on agricultural land conversion, and in environmental documents as a way of assessing project-specific impacts on Prime Farmland.

The U.S. Department of Agriculture, Natural Resources Conservation Service (NRCS) (formerly Soils Conservation Service), classifies notable agricultural lands as follows:

- **Prime Farmland:** Land that has the best combination of physical and chemical properties for the production of crops
- **Farmland of Statewide Importance:** Similar to Prime Farmland, but with minor shortcomings (e.g., steeper slopes, inability to hold water)
- **Unique Farmland:** Land of lesser quality soils, but recently used for the production of specific high economic value crops. Land is usually irrigated, but may include non-irrigated orchards or vineyards as found in some climatic zones in California

Williamson Act. The Williamson Act is intended to help preserve farmland by allowing counties to enter into contracts with private landowners for the purpose of restricting specific parcels of land to agricultural or related open space use in return for a reduction in assessed property taxes. As stated in Section 51222 of the California Government Code, the minimum acreage requirement for individual parcels to enter into Williamson Act contracts is 100 acres.

Local

City of Goleta General Plan. The objectives of the City's General Plan agricultural and forestry policies are to preserve and protect agricultural lands, encourage future expanded agricultural production, and to protect, preserve, and enhance Goleta's Urban Forest. The following policies in the General Plan relate to the proposed Project (City of Goleta, 2006):

- **Policy LU 7.2 Purpose.** The Agriculture use designation shall identify land areas reserved for or used for agricultural production. The intent of this designation is to preserve lands used for agriculture, as well as lands with characteristics that make them suitable for agriculture, to meet the needs of present and future generations (Land Use Element, 2-22).
- **Policy CE 11.1 Agricultural Uses.** The City shall encourage agriculture and floriculture uses as part of its land use program, and expansion and intensification of agricultural activities (except for large-scale confined animal uses and the addition of structures that could reduce the productive capacity of soils) shall be supported (Conservation Element, 4-29).
- **Policy CE 11.2 Conversion of Agricultural Lands.** Conversion of agricultural lands as designated on the Land Use Plan Map (Figure 2-1) to other uses shall not be allowed. Lands designated for agriculture within the urban boundary shall be preserved for agricultural use (Conservation Element, 4-29).
- **Policy CE 14.2 Public Urban Forest Management.** Urban forests are recognized as a resource created and sustained for people. The urban forest is different from wildland forests in that it requires a higher level of management. The City considers the urban forest a valuable resource. As of 2005, it was estimated that the total number of trees situated within city street rights-of-way was about 7,500. The public portion of the urban forest shall be protected, preserved, and enhanced (Conservation Element, 4-34).

5.2.3. Environmental Impacts and Mitigation Measures

Thresholds of Significance

A significant impact to Agriculture and Forest Resources would occur if the proposed project resulted in any of the impacts noted in the above checklist. Additionally, according to the City of Goleta's *Environmental Thresholds and Guidelines Manual* a project may pose a significant environmental effect on agricultural resources if it converts prime agricultural land to non-agricultural use or impairs the agricultural productivity of prime agricultural land.

Impact Analysis

(a) Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

NO IMPACT. The proposed Project site and all the land in the vicinity are designated as Urban and Built-Up Land. The Project site is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Additionally, there are no areas adjacent to the Project site that have a Farmland designation. The Project would not result in any environmental changes that would result in or contribute to the conversion of any farmland to non-agricultural uses. Agriculture is not practiced in the immediate area of the site. The proposed Project would not result in conversion of Farmland to non-agricultural use, therefore, there would be no impact.

(b) Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

NO IMPACT. The proposed Project site is currently zoned General Commercial (CG) and the Applicant is requesting a rezone from CG to Office Institutional (OI); therefore, the Project would not conflict with existing zoning for agricultural use.

The minimum acreage requirement for individual parcels to enter into Williamson Act contracts, as stated in Section 51222 of the California Government Code, is 10 acres. In addition, State CEQA Guidelines, Section 15206 does not regard the cancellation of less than 100 acres of land from Williamson Act to be of statewide, regional, or areawide significance.⁶ The Project site parcel is 2.1 acres and does not have, nor is eligible for, a Williamson Act contract (DOC, 2024). Additionally, none of the surrounding properties are subject to Williamson Act contracts, therefore, there would be no impact.

(c) Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?

NO IMPACT. The proposed Project site is in an urban area and is not forested. The Project site and surrounding areas do not contain or support forested land. The proposed Project current zoning (CG) and future zoning (OI) would not conflict with zoning for forest land, timberland, or timber production, and therefore, there would be no impact.

(d) Would the project result in the loss of forest land or conversion of forest land to non-forest use?

NO IMPACT. As stated in (c), the proposed Project would not affect any forest land since the proposed Project site is located in an urban area that is not forested. There would be no conversion of forest land to non-forest use, and therefore, there would be no impact.

⁶ Section 15206(b)(3) states that projects of statewide, regional, or areawide significance include, "[a] project which would result in the cancellation of an open space contract made pursuant to the California Land Conservation Act of 1965 (Williamson Act) for any parcel of 100 or more acres."

(e) Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

NO IMPACT. As discussed in (a), (b), and (c), there is no Farmland, agriculture, or forestland along or near the proposed Project. The proposed Project would not result in changes in the environment that would result in the conversion to non-agricultural or non-forest uses, therefore, there would be no impact.

5.2.3.1. Impact Conclusions and Mitigation Measures

The proposed Project would not result in significant impacts to agriculture and forestry resources, and thus, no mitigation measures are recommended.

5.3. Air Quality

AIR QUALITY

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.

Would the project:

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
(b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
(c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
(d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

Significance criteria established by CEQA Guidelines, Appendix G.

5.3.1. Setting

Criteria Pollutants. Air quality is determined by measuring ambient concentrations of certain criteria air pollutants. The criteria air pollutants are those pollutants for which acceptable levels of exposure can be determined and for which standards have been set. The criteria air pollutants are ozone, respirable particulate matter (PM₁₀), fine particulate matter (PM_{2.5}), carbon monoxide (CO), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), and lead. Criteria pollutants include primary pollutants that are directly emitted, and secondary emissions that are formed in the atmosphere by chemical and photochemical reactions. Ozone is an example of a secondary pollutant that is not emitted directly from a source (e.g., an automobile tailpipe). It is formed in the atmosphere by reactions involving reactive organic compounds (ROC) and nitrogen oxides (NO_x), which are regulated as precursors to ozone formation.

The degree of air quality degradation is then compared to the health-protective National and California Ambient Air Quality Standards (NAAQS and CAAQS). Unique meteorological conditions in California and differences of opinion by medical panels established by the California Air Resources Board (CARB) and the U.S. Environmental Protection Agency (U.S. EPA) cause considerable diversity between State and Federal standards currently in effect in California. In general, the CAAQS are more stringent than the corresponding NAAQS. The standards currently in effect in California are shown in Table 5.3-1.

Table 5.3-1. National and California Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards	National Standards
Ozone	1 hour	0.09 ppm	—
	8 hour	0.070 ppm	0.075 ppm
Respirable Particulate Matter (PM ₁₀)	24 hour	50 µg/m ³	150 µg/m ³
	Annual Mean	20 µg/m ³	—
Fine Particulate Matter (PM _{2.5})	24 hour	—	35 µg/m ³
	Annual Mean	12 µg/m ³	15 µg/m ³
Carbon Monoxide (CO)	1 hour	20 ppm	35 ppm
	8 hour	9.0 ppm	9.0 ppm
Nitrogen Dioxide (NO ₂)	1 hour	0.18 ppm	—
	Annual Mean	0.030 ppm	0.053 ppm

Pollutant	Averaging Time	California Standards	National Standards
Sulfur Dioxide (SO ₂)	1 hour	0.25 ppm	—
	24 hour	0.04 ppm	0.14 ppm
	3 hour	—	0.5 ppm
	Annual Mean	—	0.03 ppm

Notes: ppm=parts per million; µg/m³= micrograms per cubic meter; “—” =no standard

Source: CARB (<http://www.arb.ca.gov/research/aaqs/aaqs2.pdf>), November, 2008.

Attainment Status and Air Quality Plans. The U.S. EPA, California Air Resource Board (CARB), and the local air district classify an area as attainment, unclassified, or nonattainment. The classification depends on whether the monitored ambient air quality data show compliance, insufficient data available, or non-compliance with the ambient air quality standards, respectively. The proposed Project would be located within the City of Goleta, in Santa Barbara County under the jurisdiction of the Santa Barbara Air Pollution Control District (SBAPCD). Table 5.3-2 summarizes attainment status for the criteria pollutants in Santa Barbara County with both the federal and state standards.

Table 5.3-2. Attainment Status for Santa Barbara County

Pollutant	State Designation	Federal Designation
Ozone (1hr and 8 hr)	Nonattainment	Attainment/Unclassified
PM ₁₀	Nonattainment	Unclassified
PM _{2.5}	Attainment	Attainment/Unclassified
CO	Attainment	Attainment/Unclassified
NO ₂	Attainment	Attainment/Unclassified
SO ₂	Attainment	Attainment/Unclassified

Source: SBCAPCD, 2025

Valley Fever

Coccidioidomycosis, often referred to as San Joaquin Valley Fever or Valley Fever, is a fungal infection that varies with the season and most commonly affects people who live in hot dry areas with alkaline soil. This disease affects both humans and animals and is caused by inhalation of arthroconidia (spores) of the fungus *Coccidioides immitis*. *Coccidioides immitis* spores are found in the top few inches of soil, and the existence of the fungus in most soil areas is temporary. The cocci fungus lives as a saprophyte (an organism, especially a fungus or bacterium, which grows on and derives its nourishment from dead or decaying organic matter) in dry, alkaline soil. When weather and moisture conditions are favorable, the fungus “blooms” and forms many tiny spores that lie dormant in the soil until they are stirred up by wind, vehicles, excavation, or other ground-disturbing activities and become airborne. Agricultural workers, construction workers, and other people who are outdoors and are exposed to wind, dust, and disturbed topsoil are at an elevated risk of contracting Valley Fever. African Americans, Asians, women in the third trimester of pregnancy, and persons whose immunity is compromised are most likely to develop the most severe form of the disease (California Department of Public Health [CDPH], 2019).

The proposed Project is located in the Central Coast region of California, which is an area of California where relatively high numbers of cases of Valley Fever are reported. Data from 2023 show the incident rate in Santa Barbara County was 19.7 in 100,000 with 88 total cases, though the relative standard error of the data is 23% or higher (CDPH, 2023).

Toxic Air Contaminants

Toxic air contaminants (TACs) are air pollutants that may lead to serious illness or increased mortality, even when present in relatively low concentrations. Potential human health effects of TACs include birth defects, neurological damage, cancer, and death. There are hundreds of different types of TACs with varying degrees of toxicity. Individual TACs vary greatly in the health risk they present; at a given level of exposure, one TAC may pose a hazard that is many times greater than another. TACs do not have ambient

air quality standards but are regulated by the local air districts using a risk-based approach. Diesel particulate matter (DPM) is classified as a TAC, and statewide and local programs focus on managing this pollutant through motor vehicle fuels, engine, and tailpipe standards because many toxic compounds adhere to diesel exhaust particles. The proposed Project is not considered a stationary source subject to risk assessment programs.

Sensitive Receptors

Residential areas, day care centers, hospitals, and schools are some examples of sensitive receptors. Sensitive receptors include facilities or land uses that include members of the population that are particularly sensitive to the effects of air pollutants, such as children, the elderly, and people with illnesses. 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. Other nearby receptors include the Hideaway residential neighborhood located approximately 300 feet west (west of the EGS and Las Armas Road) and Ellwood Elementary School located approximately 500 feet east.

5.3.2. Regulatory Background

Federal

Clean Air Act. The federal Clean Air Act (CAA) establishes the statutory framework for regulation of air quality in the United States. Under the CAA, the U.S. EPA oversees implementation of federal programs for permitting new and modified stationary sources, controlling toxic air contaminants, and reducing emissions from motor vehicles and other mobile sources.

Title I (Air Pollution Prevention and Control) of the federal CAA requires establishment of National Ambient Air Quality Standards (NAAQS) for criteria pollutants, air quality designations, and plan requirements for nonattainment areas. States are required to submit a state implementation plan (SIP) to the U.S. EPA for areas in nonattainment with NAAQS. The SIP, which is reviewed and approved by the U.S. EPA, must demonstrate how state and local regulatory agencies will institute rules, regulations, and/or other programs to attain NAAQS over time.

State

U.S. EPA/CARB Off-Road Mobile Sources Emission Reduction Program. The California Clean Air Act mandates that CARB achieve the maximum degree of emission reductions from all off-road mobile sources in order to attain the state ambient air quality standards. Off-road mobile sources include construction equipment. Tier 1 standards for large compression-ignition engines used in off-road mobile sources went into effect in California in 1996. These standards and ongoing rulemaking jointly address emissions of nitrogen oxides (NOx) and toxic particulate matter from diesel combustion. CARB is also developing a control measure to reduce diesel particulate matter emissions as well as NOx from in-use (existing) off-road diesel equipment throughout the State.

ARB In-Use Off-Road Diesel-Fueled Fleets Regulation. The regulation for in-use off-road diesel-fueled fleets is designed to reduce mobile-source NOx and toxic DPM. Depending on the size of the fleet of equipment, the fleet owner must ensure that the average emissions performance of the fleet meets certain statewide standards. In lieu of improving the emissions performance of the fleet, electric systems can be installed to replace diesel equipment in the fleet's average calculations. Presently, all equipment owners are subject to a five-minute idling restriction in the rule (Cal. Code Regs., tit. 13, § 2449).

CARB Portable Equipment Registration Program. This program allows owners or operators of portable engines and associated equipment commonly used for construction or farming to register their units

under a statewide portable program that allows them to operate their equipment throughout California without having to obtain individual permits from local air districts.

ARB Airborne Toxic Control Measures (ATCM). Diesel engines on portable equipment and vehicles are subject to various ATCMs that dictate how diesel sources must be controlled statewide. For example, the ATCM to Limit Diesel-Fueled Commercial Motor Vehicle Idling generally limits idling of commercial motor vehicles (including buses and trucks) within 100 feet of a school or residential area for more than five consecutive minutes or periods aggregating more than five minutes in any one hour (Cal. Code Regs., tit. 13, § 2485). Diesel engines used in portable equipment fleets are subject to stringent DPM emissions standards, generally requiring use of only newer engines or verified add-on particulate filters (Cal. Code Regs., tit. 17, § 93116).

Local

Santa Barbara County Air Pollution Control District

The SBCAPCD is responsible for planning, implementing, and enforcing federal and state ambient air quality standards in Santa Barbara County and for permitting and controlling stationary sources and TAC pollutants. The SBCAPCD's Rules regulate sources of air pollution in Santa Barbara County. The SBCAPCD rules that may be applicable to the proposed Project are identified below.

SBCAPCD Rule 302 – Visible Emissions. This rule prohibits discharge of air contaminants or other material that are as dark or darker in shade as that designated No. 1 on the Ringelmann Chart or that obscure an observer's view.

SBCAPCD Rule 303 – Nuisance. This rule prohibits discharge of air contaminants or other material that cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public; or that endanger the comfort, repose, health, or safety of any such persons or the public; or that cause, or have a natural tendency to cause, injury or damage to business or property.

Currently, the SBCAPCD does not have daily or quarterly quantitative emission thresholds established for short-term construction emissions. Emissions from construction activities are normally short-term and subject to standardized emission control strategies.

Although quantitative thresholds of significance are not currently in place for short-term or construction emissions, the SBCAPCD recommends that construction projects that would not emit more than 25 tons per year of any pollutant shall not be required to obtain An Authority to Construct or Permit to Operate. APCD Rule 202(D)(16), related to permits and exemptions, states:

Notwithstanding any exemption in these rules and regulations, if the combined emissions from all construction equipment used to construct a stationary source which requires an Authority to Construct have a projected actual in excess of 25 tons of any pollutant, except carbon monoxide, in a 12 month period, the owner of the stationary source shall provide offsets as required under the provisions of Rule 804, Emission Offsets, and shall demonstrate that no ambient air quality standard would be violated.

The SBCAPCD Board adopted significance thresholds (SBCAPCD, 2015) for the operation of a project as not having a significant impact on air quality if the project would:

- Emit (from all project sources, both stationary and mobile) less than the daily trigger for offsets or Air Quality Impact Analysis set in the APCD New Source Review Rule, for any pollutant (i.e., 240 lb/day for Reactive Organic Compounds (ROC) or NO_x; and 80 lb/day for PM₁₀. There is no daily operational threshold for CO; it is an attainment pollutant).
- Emit less than 25 lb/day NO_x or ROC from motor vehicle trips only.

- Not cause or contribute to a violation of any CAAQS or NAAQS (except ozone).
- Not exceed the APCD health risk public notification thresholds adopted by the APCD Board (10 excess cancer cases in a million) for cancer risk and not exceed a Hazard Index of 1.0 for non-cancer risk.
- Be consistent with the latest adopted federal and state air quality plans for Santa Barbara County (SBCAPCD, 2017).

City of Goleta

The City of Goleta adopted local CEQA guidelines in August 2008. The Environmental Review Guidelines set procedures for complying with CEQA, to protect both local and regional resources while reflecting local values. The City's Environmental Review Guideline's Air Quality Thresholds adopt the SBCAPCD Environmental Review Guidelines, which are outlined above. Additional dust control rules as defined by the SBAPCD and listed above include Rule 302 – Visible Emissions and Rule 303 – Nuisance. Additional SBAPCD rules include Rule 201 – Permits Required, and Rule 345 – Control of Fugitive Dust from Construction and Demolition Activities. Standard dust control measures required by the SBAPCD are included below. No additional AQ thresholds are set by the City.

5.3.3. Environmental Impacts and Mitigation Measures

Thresholds of Significance

A significant air quality impact could occur if the proposed project resulted in any of the impacts noted in the above checklist.

A significant air quality impact could occur if the proposed Project resulted in any of the impacts noted in the above checklist. In addition, pursuant to 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), a significant adverse air quality impact may occur when a project, individually or cumulatively, triggers either of the following:

Threshold AQ-1. Interfere with progress toward the attainment of the ozone standard by releasing emissions which equal or exceed the established long-term quantitative thresholds for NOX (nitrogen oxides) and ROC (reactive organic compounds; same as reactive organic gases [ROG]). Thresholds are 25 pounds/day of either NOX or ROC.

Threshold AQ-2. Equals or exceeds the state or federal ambient air quality standards for any criteria pollutant (as determined by modeling).

Threshold AQ-3. Results in toxic or hazardous pollutants in amounts which may increase cancer risks for the affected population.

Threshold AQ-4. Causes an odor nuisance problem impacting a considerable number of people.

Additionally, the SBCAPCD thresholds, listed above, are considered appropriate for use as a guideline for the impact analysis.

Impact Analysis

Threshold AQ-1 is addressed in Checklist Items (a) and (b), Threshold AQ-2 is addressed in Checklist Item (b), Threshold AQ-3 is addressed in Checklist Item (c), and Threshold AQ-4 is addressed in Checklist Item (d).

(a) Would the project conflict with or obstruct implementation of the applicable air quality plan?

DURING CONSTRUCTION, *LESS THAN SIGNIFICANT*. The SBCAPCD 2022 Ozone Plan identifies measures to attain the state ozone standard standards. The SBCAPCD 2022 Ozone Plan includes an "every feasible measure"

strategy to ensure progress towards attainment. Over 30 control measures have been adopted or amended to reduce ozone precursors, generally focusing on coatings, residential heaters and boilers, and industrial oil and gas processes. Proposed Project activities in the City of Goleta would be subject to the SBCAPCD rules and regulations and implementing the Ozone Plan control measures to ensure that the activities conform with local ozone attainment strategies. This would include but not be limited to, Rule 201 – Permits Required, Rule 302 – Visible Emissions, Rule 303 – Nuisance, Rule 306-Dust and Fumes, and Rule 345 – Control of Fugitive Dust from Construction and Demolition Activities. All construction activities would be required to comply with all applicable SBCAPCD rules, regulations, and programs. Impacts would be less than significant.

During decommissioning, activities would be similar to construction, except materials would be removed and exported from the site, rather than imported, and therefore impacts during decommissioning would be similar. Impacts would be less than significant.

DURING OPERATION, LESS THAN SIGNIFICANT. Operation of the proposed Project would be required to comply with all applicable air pollution control rules and regulations. The Project would typically generate 1-2 trips a week on average, and up to 10 vehicle trips per week at a maximum during the first year of BESS facility operation for equipment inspection and maintenance purposes. Vehicle trips may be reduced after the Project's first year of operation because the first year of operations typically includes more start up activities such as commissioning and system testing, performance optimization, and the resolution of initial issues, which are often resolved within the first year of operations. Long-term operations would entail no water consumption and only minor air emissions from vehicle trips. Proposed Project activities in the City of Goleta would be subject to the SBCAPCD rules and regulations implementing the Ozone Plan control measures to ensure that the activities conform with local ozone attainment strategies. A Project could be found inconsistent with the applicable air quality management plan or attainment plan if it could cause population and/or employment growth or growth in vehicle-miles traveled in excess of the growth forecasts included in the air quality attainment plan. Since the Project would be unmanned, the Project would not require any new permanent full-time or part-time staff after construction is complete. Long-term operation of the BESS facility would not conflict with or obstruct implementation of the applicable air quality plan. Impacts would be less than significant.

(b) Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

DURING CONSTRUCTION, LESS THAN SIGNIFICANT. The construction, commissioning and decommissioning-related increase in air pollutant emissions would occur in the regional context of the South Central Coast Air Basin (SCCAB) that is currently designated as "nonattainment" for ozone and PM10. Construction-phase activities include mobilizing vehicles and equipment for construction, crews, and materials. The site work would include site preparation and minor vegetation clearing, rough and fine grading, installing the BESS foundations and BESS enclosures, laying the underground electrical collection and communication lines, assembling accessory electrical components including transformers, and installing high-voltage equipment such as the generation-tie line. These activities during construction would generate emissions at the work area and along the roadways used to access the site. Immediately following the completion of construction, commissioning would occur, and would not include any off-road equipment, nor any heavy-duty vehicles, and would consist of up to 15 passenger vehicle trips daily to transport employees to and from the site. Emissions associated with these vehicle trips would be much lower than calculated construction emissions. The decommissioning work would include removal of battery units from the foundations, disconnection of wiring, and transport of the battery units to an approved recycling facility. Construction is expected to take approximately 8 months. Commissioning is expected to take 3 to 4 months. The peak number of construction personnel would be 20 workers.

Construction, commissioning and decommissioning emissions would be caused by exhaust from vehicles and equipment and fugitive dust from ground-disturbing activities. The mobile sources would be a mix of diesel-powered off-road construction equipment types, including: cranes, dozers, graders, excavators, loaders, and tractors. On-road mobile sources would include diesel and gasoline-powered vehicles for linework and trucks for deliveries of concrete, water, and other materials. Outside of the work site, construction, commissioning and decommissioning traffic would cause exhaust emissions from the trucks and other vehicles used by crews, materials, and equipment to access the work site. Table 4-5 in the Project Description includes a summary of equipment and truck trips used to calculate the construction emissions presented in Table 5.3-1. Additional calculation details can be found in Appendix D, Air Quality and Greenhouse Gas Report.

Table 5.3-1. Maximum Daily Construction Emissions (lbs/day)

Construction	VOC	NOx	CO	SO ₂	PM ₁₀	PM _{2.5}
Maximum Daily Construction Emissions	18.0	11.4	16.0	0.04	1.02	0.41
Threshold of Significance	25*	25*	-	-	80	80
Exceeds Threshold?	No	No	NA	NA	No	No

Source: SBCAPCD, 2017; and Appendix D, Air Quality and Greenhouse Gas Report

*NOx and ROC threshold includes emissions motor vehicle trips only, however, reported emissions include all construction phase emissions, and as such are conservative.

While SBCAPCD does not have daily construction thresholds, construction of the proposed Project would occur within one calendar year, and Table 5.3-1 shows that proposed Project construction emissions would not exceed SBCAPCD daily operational thresholds.

Table 5.3-2. Annual Construction Emissions (tons/year)

Construction	VOC	NOx	CO	SO ₂	PM ₁₀	PM _{2.5}
Maximum Daily Construction Emissions	0.33	0.46	0.66	0.001	0.03	0.02
Threshold of Significance	25	25	25	25	25	25
Exceeds Threshold?	No	No	NA	NA	No	No

Source: SBCAPCD, 2017; and Appendix D, Air Quality and Greenhouse Gas Report

Table 5.3-2 shows that proposed Project construction would not exceed SBCAPCD's annual thresholds, and as such impacts are less than significant.

Although construction related emissions would not exceed suggested SBAPCD's thresholds, SBAPCD requires implementation of the following standard dust control measures for all discretionary projects involving earth moving activities:

- (a) During construction, water trucks or sprinkler systems shall be used to keep all areas of vehicle movement damp enough to prevent dust from leaving the site. At a minimum, this should include wetting down such areas in the late morning and after work is completed for the day. Increased watering frequency should be required whenever the wind speed exceeds 15 miles per hour. Reclaimed water should be used whenever possible. However, reclaimed water should not be used in or around crops for human consumption.
- (b) The amount of disturbed area shall be minimized, and on-site vehicle speeds shall be reduced to 15 miles per hour or less.
- (c) If import, export, and stockpiling of fill material is involved, soil stockpiled for more than two days shall be covered, kept moist, or treated with soil binders to prevent dust generation. Trucks transporting fill material to and from the site shall be tarped from the point of origin.

- (d) Gravel pads shall be installed at all access points to prevent tracking of mud onto public roads.
- (e) After clearing, grading, earth moving, or excavation is completed, the disturbed area shall be treated by watering, revegetating, or spreading soil binders until the area is paved or otherwise developed so that dust generation will not occur.
- (f) The contractor or builder shall designate a person or persons to monitor the dust control program and to order increased watering, as necessary, to prevent transport of dust off-site. Their duties shall include holiday and weekend periods when work may not be in progress. The name and telephone number of such persons shall be provided to the SBCAPCD prior to grading/building permit issuance and/or map clearance.

With implementation of required dust control measures, less than significant short term emissions would be reduced to the extent feasible, and potential dust nuisance impacts to surrounding land uses would also be less than significant.

During decommissioning, activities would be similar to construction, except materials would be removed and exported from the site, rather than imported, and therefore impacts during decommissioning would be similar. Impacts would be less than significant.

DURING OPERATION, *LESS THAN SIGNIFICANT*. Potential emissions related to proposed Project operation would be limited to deliveries and transportation to and from the site for maintenance activities. The batteries themselves would not result in air pollutant emissions. Operations at the proposed Project site would be minimal as the BESS facility would be unstaffed. The proposed Project would typically generate 1-2 trips a week on average, and up to 10 vehicle trips per week at a maximum during the first year of BESS facility operation for equipment inspection and maintenance purposes. Vehicle trips may be reduced after the Project's first year of operation. Operation phase emissions would thus be minimal and far less than construction phase emissions. This impact would be less than significant, and no mitigation would be required during operations.

(c) Would the project expose sensitive receptors to substantial pollutant concentrations?

DURING CONSTRUCTION, *LESS THAN SIGNIFICANT*. Construction, commissioning and decommissioning would generate toxic air contaminants routinely found in the exhaust of gasoline powered motor vehicles and of diesel-fueled equipment, including diesel particulate matter (DPM). The proposed Project would not involve any permanent or stationary sources of air pollution, but construction would temporarily bring construction equipment onto the proposed Project site and onto roadways accessing the site. The nearest sensitive receptors are approximately 200 feet northeast of the Mariposa at Ellwood Shores elder care facility on the east side of Viajero Drive.

Short-term emissions associated with construction, commissioning and decommissioning would occur onsite and along the roadways accessing the work areas. The proposed activities include mobilizing vehicles and equipment for construction, crews, and materials. The site work would include site preparation and minor vegetation clearing, rough and fine grading, installing the BESS foundations and BESS enclosures, laying the underground electrical collection and communication lines, assembling accessory electrical components including transformers, and installing high-voltage equipment such as the generation-tie line. Construction equipment and vehicles would access and move within the proposed Project site throughout the short construction duration of approximately eight months. Commissioning would occur over a 3-to-4-month period. Construction emissions would be limited in duration and as such this minimizes the potential that any receptor would be exposed to substantial pollutant concentrations.

Toxic Air Contaminants (TAC) Health Risk Analysis

DURING CONSTRUCTION, *LESS THAN SIGNIFICANT*. TAC emissions, primarily in the form of diesel particulate matter, would occur during the short-term construction period, and then intermittently during the limited

operations and maintenance activities required for the proposed Project. Additionally, construction equipment using diesel fuel would be subject to the ARB In-Use Off-Road Diesel-Fueled Fleets Regulation and other controls including limitations on idling. As a result, and as noted in Table 5.3-1 and Table 5.3-2 (PM10 reported is the total fugitive PM10 and exhaust PM10, so exhaust PM would be even lower than the reported values seen in the aforementioned tables), the amount of diesel particulate matter that would be emitted from the proposed Project's activities would be minimal in comparison with the thresholds for PM10 and PM2.5. The potential exposure of sensitive receptors to diesel particulate matter emissions would be limited, as it would occur primarily during the limited construction period. The Project's construction and operation TAC emissions would cause less than significant health risk impacts.

Since off-road heavy-duty diesel equipment would only be used temporarily during construction, construction would not expose sensitive receptors to substantial emissions of TACs, and this impact would be less than significant.

Construction contractors would be required to follow the practices outlined in District Rule 302 Visible Emissions and 303 Nuisance, which would minimize the emissions of dust. This would ensure that receptors would not be exposed to substantial concentrations. Impacts would be less than significant.

DURING OPERATION, LESS THAN SIGNIFICANT. Potential emissions related to proposed Project operation would be limited to deliveries and transportation to and from the site for maintenance activities. The batteries themselves would not result in any air emissions. Operations at the proposed Project site would be minimal because the site would be operated remotely. Operation phase emissions would be less than construction phase emissions. The operation-phase emissions would not expose sensitive receptors to substantial pollutant concentrations and would have less than significant impacts.

(d) Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

DURING CONSTRUCTION, LESS THAN SIGNIFICANT. The Project would not include any sources likely to create objectionable odors. Construction, commissioning and decommissioning would involve the temporary use of vehicles and construction equipment and materials, such as fuels, that may generate intermittent, minor odors. Odors that occur in equipment exhaust would be minimized by mandatory use of ultra-low sulfur diesel fuel. These emissions would occur briefly during construction, commissioning and decommissioning and would cease at the end of those activities. There would be no notable impact of objectionable odors affecting a substantial number of people. This impact would be less than significant, and no mitigation is required.

DURING OPERATION, LESS THAN SIGNIFICANT. Land uses that are likely to produce odors include operations associated with agriculture, waste management, refineries, wastewater treatment, and certain chemical and manufacturing plants. The proposed Project does not include any manufacturing or agricultural uses and would not emit objectionable odors. Impacts would be less than significant with no mitigation required.

5.3.3.1. Impact Conclusions and Mitigation Measures

The proposed Project would not result in significant air quality impacts, and thus, no mitigation measures are recommended.

5.4. Biological Resources

BIOLOGICAL RESOURCES		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
(a)	Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
(b)	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
(c)	Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☒	☐
(d)	Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☒	☐	☐
(e)	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
(f)	Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

Significance criteria established by CEQA Guidelines, Appendix G.

5.4.1. Setting

This section describes the biological resources that occur in the Project site which includes the underground interconnection line. It includes a description of the existing biotic environment, including common plants and wildlife, sensitive habitats, special-status species and their locations in relation to the proposed Project. The following sections present an analysis of potential impacts to biological resources and, where necessary, specify mitigation measures to reduce potential impacts to less-than-significant levels. Information used in preparing this section was derived from:

- A Biological and Aquatic Resources Technical Report for the Greenbark 30 Energy Storage Project (ERM 2024);
- An Addendum to the Biological and Aquatic Resources Technical Report for the Greenbark 30 Energy Storage Project (ERM 2025);
- A Biological Technical Report prepared for the adjacent Goleta Self Storage Project (Rincon 2021);
- A site visit conducted by Aspen biologist Jenny Slaughter on April 16, 2025; and
- Various other resources cited in these documents.

5.4.2. Regulatory Background

The regulatory background is presented in Appendix E.

5.4.3. Environmental Impacts and Mitigation Measures

Thresholds of Significance

A significant impact on Biological Resources would be expected to occur if the Project resulted in any of the impacts noted in the above checklist. In addition, 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) defines the following thresholds of significance:

Threshold BIO-1. Disturbances to habitats or species may be significant, based on substantial evidence in the record, if they substantially impact significant resources in the following ways:

- Substantially reduce or eliminate species diversity or abundance.
- Substantially reduce or eliminate quantity or quality of nesting areas.
- Substantially limit reproductive capacity through loss of individuals or habitat.
- Substantially fragment, eliminate, or otherwise disrupt foraging areas and/or access to food resources.
- Substantially limit or fragment range and movement (geographic distribution of animals and/or seed dispersal routes).
- Substantially interfere with natural processes, such as fire or flooding, upon which the habitat depends.

Threshold BIO-2. The *Environmental Thresholds and Guidelines Manual* provides examples of areas in the City of Goleta where impacts to habitat are presumed to be less than significant, including:

- Small acreages of non-native grassland if wildlife values are low.
- Individuals or stands of non-native trees if not used by important animal species such as raptors or monarch butterflies.
- Areas of historical disturbance such as intensive agriculture.
- Small pockets of habitats already significantly fragmented or isolated, and disturbed or degraded.
- Areas of primarily ruderal species resulting from pre-existing man-made disturbance.

Impact Analysis

Threshold BIO-1 is addressed in Checklist Items (a) and (b), and Threshold BIO-2 is addressed in Checklist Item (b).

(a) Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service; and Threshold BIO-1

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED. As described in the Biological and Aquatic Resources Technical Report (Appendix E), no special-status species were identified within the Project site, but several species have a potential to be present as discussed below.

Special-Status Plants

As described in the Biological and Aquatic Resources Technical Report (Appendix E), no listed plant species were observed within the Project site and none have a potential to be present. One special-status plant with a California Rare Plant Rank (CRPR) of 1B.1, southern tarplant, is known from several locations within roughly 1 mile to the southeast of the Project site. This species has not been detected during multiple biological surveys and is considered unlikely to occur within the Project site. Its absence is attributed to the highly disturbed nature of the area, which includes extensive grading, infrastructure development, and ongoing human activity that has reduced the suitability of the habitat within the Project site. Additionally, the species is conspicuous in appearance, making it relatively easy to detect during appropriately timed surveys. The lack of observations across multiple survey efforts further supports the

conclusion that the species is not present in the Project site. No additional special-status plants are likely to occur.

Special-Status Wildlife

As described in the Biological and Aquatic Resources Technical Report (Appendix E), no listed wildlife species were observed within the Project site. One species proposed for federal listing, monarch butterfly, and one species that is a candidate for state listing, Crotch's bumble bee, and one California Department of Fish and Wildlife (CDFW) species of special concern, western red bat, do have a potential to be present.

Overwintering surveys for monarch butterfly were conducted in December of 2022 and no roosting butterflies were observed. Additionally, it was determined that the micro-habitat (a small area which differs from the surrounding habitat such as soil type, slope, moisture levels, temperature, and light exposure) within the Project site is not suitable for monarch butterflies, although they may occasionally fly through the area.

Crotch's bumble bee has not been observed within the Project site but has been observed multiple times within roughly 2.1 miles of the Project site in recent years. Suitable foraging habitat is present along with multiple floral resources and rodent burrows are present that may be utilized for nesting habitat. Project activities have a potential to impact Crotch's bumble bee if present at the start of the Project.

Western red bat has not been observed within the Project site, but it has potential to roost in eucalyptus trees. It was determined that the habitat within the Project site is not suitable to support a maternity colony for western red bat, although it may occasionally support roosting individuals. Project activities have potential to impact western red bat if present at the start of the Project.

Impacts to special-status plant and wildlife species would be avoided with the implementation of Mitigation Measures (MMs) BIO-1, BIO-2, and BIO-3 by providing environmental training to personnel, controlling invasive species, requiring pre-construction surveys for special-status wildlife prior to initiating work, and monitoring of special-status wildlife to ensure their safety. Impacts to Crotch's bumble bee would be avoided with the implementation of MM BIO-4 by requiring pre-construction surveys, establishing nest buffers, and delaying Project activities in the event that a nest is found. With implementation of MMs BIO-1, BIO-2, BIO-3, and BIO-4, impacts to special-status species would be reduced to a less-than-significant level.

Mitigation Measure for Special-Status Animal Species

MM BIO-1 Worker Environmental Awareness Training. Prior to the initiation of BESS construction, a Worker's Environmental Awareness Program will be prepared and implemented. For this training, a qualified biologist will:

- Provide environmental training materials that include all relevant permit conditions, avoidance and minimization measures, identification of sensitive biological resources, and legal repercussions of environmental damage.
- Conduct a pre-construction meeting with work crews to review environmental training materials. Personnel will review the protective measures from the relevant permits. New crew members brought on during the Project will receive the same level of training.
- Copies of the permits and educational information will be distributed to personnel to be available at the work site.

MM BIO-2 Invasive Species Control. The Environmental Awareness training will include identification of common invasive species known to the local area, inspection procedures, and

removal methodologies. Invasive species inspections and maintenance will be incorporated into Operation and Maintenance documentation for the Project.

MM BIO-3 Special Status Wildlife Avoidance.

- Within 3 days prior to initial clearing and grubbing of vegetation, a qualified biologist will conduct a pre-construction survey for special-status wildlife species, including the Western red bat. Should special-status species be observed, they will be monitored as grading and clearing progresses to confirm that they safely move out of the area.
- To protect potential red bat roosting habitat, pre-construction surveys will be conducted by a qualified biologist to identify suitable roost trees, particularly large mature trees with exfoliating bark or dense foliage. If active roosts are identified, a no-disturbance buffer of at least 100 feet will be established around the roost site, and work within this buffer will be postponed until the bats have naturally vacated the area. Vegetation removal will be scheduled outside of the bat maternity season (typically April 1 to August 31) to avoid disturbing maternal colonies.
- Trenches will be covered overnight, or a ramp will be provided at one end for wildlife to escape.

MM BIO-4 Crotch's Bumble Bee. Consistent with CDFW's 2023 guidance (Survey Considerations for CESA Candidate Bumble Bee Species), three visual survey passes for foraging and nesting Crotch bumble bee will be conducted by a qualified biologist during the Colony Active Period (April to August) preceding the initiation of construction. The survey passes will be separated by no less than 2 weeks and no more than 4 weeks. Survey passes will take place during the day (at least 1 hour after sunrise and 2 hours before sunset) on warm (65-90 degrees Fahrenheit), sunny days with low wind (less than 8 miles per hour). Survey results, including negative findings, will be submitted to the City. If survey results are negative, no further actions are required. Should Crotch bumblebee nests/colonies be detected within the Parcel during surveys, an avoidance plan will be developed, if feasible, in consultation with the City and in coordination with CDFW. No construction permits will be issued until the plan has been approved by the City and no further actions are required. If avoidance is infeasible, the Project proponent will initiate consultation with CDFW. No construction permits will be issued until a 2081 Incidental Take Permit is issued or CDFW provides written concurrence that a 2081 Incidental Take Permit is unnecessary.

(b) Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service; and Thresholds BIO-1 and BIO-2.

NO IMPACTS. As described in the Biological and Aquatic Resources Technical Report (Appendix E), a total of 10 vegetation types or land cover types were present within the Project site. They include arroyo willow thickets, developed, eucalyptus - tree of heaven - black locust groves, hardstem and California bulrush marshes, ice plant mats, ornamental landscaping, pepper tree or myoporum groves, poison hemlock or fennel patches, upland mustards or star-thistle fields, and wild oats and annual brome grasslands. Most of these vegetation and land cover types are not riparian habitats or sensitive natural communities. Arroyo willow thickets are a type of riparian habitat. Up to 0.05 acres of this habitat are present within the wetland area in the southwest portion of the Project site. The vegetation community is located outside of the Project impact area. Therefore, no impacts to arroyo willow thickets are anticipated. An additional 0.02 acres of hardstem and California bulrush marshes, a sensitive natural community, are also present within the Project site. However, the Project has been designed to avoid this vegetation community and

includes a 50-foot buffer to further minimize potential impacts. No impacts to riparian habitat and sensitive natural communities are expected.

(c) Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED. As described in the Biological and Aquatic Resources Technical Report (Appendix E), 0.12 acres of Central Coast Regional Water Quality Control Board (CCRWQCB) Wetlands and Waters of the state are present within the southwest portion of the Project site. This is based on an assessment of jurisdictional resources conducted by ERM biologists on December 8, 2022.

The applicant will design the Project to satisfy the City's Development Standards, as well as state and federal regulatory requirements including incorporating design elements necessary to minimize fugitive dust and maintain existing stormwater quality and hydraulic characteristics. Impacts to wetlands and other jurisdictional waters would be less-than-significant level.

Impacts to protected wetlands would be avoided with the implementation of Mitigation Measures (MMs) BIO-1, BIO-2, and BIO-5. By providing environmental training to personnel, controlling invasive species, and implementing fugitive dust control and stormwater protection. With implementation of MMs BIO-1, BIO-2, and BIO-5, impacts to protected wetlands would be reduced to a less-than-significant level.

Mitigation Measure for State or Federally Protected Wetlands

MM BIO-5 Fugitive Dust Control and Stormwater Protection. To minimize fugitive dust emissions and protect stormwater quality during construction, a combination of targeted design elements and operational practices will be implemented. Stabilized construction entrances using gravel pads will be installed at all access points to reduce sediment track-out, which can lower offsite dust transport by up to 80%. A water application system, including water trucks will be used to maintain soil moisture on disturbed surfaces, reducing airborne dust by up to 90% during active grading. Wind breaks such as temporary fencing or vegetative buffers will be placed strategically to reduce wind velocity and dust dispersion by 30–50%. Soil stockpiles will be covered with tarps and surrounded by silt fencing to prevent erosion and reduce dust emissions by over 95%. To maintain stormwater quality and hydraulic function, erosion and sediment control BMPs—including fiber rolls, check dams, and inlet protection—will be installed to prevent sediment-laden runoff while preserving flow conveyance. Daily inspections and adaptive management will ensure the effectiveness of these measures and compliance with regulatory requirements.

(d) Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED. As described in the Biological and Aquatic Resources Technical Report (Appendix E), the Project site provides suitable nesting habitat for numerous resident and migratory bird species. Although no bird nests were observed during the surveys conducted in support of the Project, suitable nest sites are expected throughout the Project site and adjacent open space, and many common bird species are expected to nest there. Implementation of MM BIO-6 would reduce or avoid any potential impacts to nesting birds. Given the limited extent of the Project site, the absence of wildlife corridors and the short duration of construction activities, the Project's impacts on the movement of any native resident or migratory fish or wildlife species would be less than significant. Impacts to nesting birds would be less than significant with mitigation incorporated.

Mitigation Measure for Nesting Birds

MM BIO-6 Nesting Bird Avoidance. Removal of vegetation between March 1 and September 15 will be avoided to the extent feasible. Should vegetation removal be required on the Project site between 1 March and 15 September, a qualified biologist will conduct nesting bird surveys no more than 7 days prior to vegetation removal. If pre-construction surveys detect an active nest, no vegetation clearing, grading, construction, or other development activity will be permitted within 100 feet of the nest site (300 feet for raptors) during the nesting and fledging season to the extent feasible.

(e) Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED. Conservation Element Policy Conservation Element (CE) 1 of the City of Goleta General Plan/Coastal Land Use Plan (GP/CLUP) requires that all Environmentally Sensitive Habitat Areas (ESHA) identified in the GP/CLUP be protected against significant degradation of habitat value (City of Goleta 2006). According to Conservation Element Figure 4-1 of the GP/CLUP, no special-status species or ESHA are mapped on or near the Project site. However, one sensitive vegetation community, hardstem and California bulrush marsh, is present within the Project site. This community also meets the definition of a City- and state-regulated wetland. Impacts would be less-than-significant. Therefore, the Project would be consistent with Policy CE 1.

Conservation Element Policy CE 9 pertains to the protection of native woodlands. The Project would not result in the removal of any protected trees. Therefore, the Project would be consistent with Policy CE 9.

(f) Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

NO IMPACT. There are no adopted Habitat Conservation Plans, Natural Community Conservation Plans, or other similar plans that overlap with the Project site (CDFW, 2025). The nearest conservation plan area is the Kern Water Bank Natural Community Conservation Plan/Habitat Conservation Plan, which is located approximately 67 miles northeast of the Project site (CDFW, 2025). Therefore, no impacts would occur, and no mitigation is required.

5.4.3.1. Impact Conclusions and Mitigation Measures

The proposed Project would result in potentially significant impacts to special status animal species, state or federally protected wetlands, and nesting birds, therefore, mitigation measures MM BIO-1 through MM BIO-6 are recommended. With implementation of these mitigation measures, impacts would be less than significant.

5.5. Cultural Resources

CULTURAL RESOURCES				
Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	☐	☒	☐	☐
(b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	☐	☒	☐	☐
(c) Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☒	☐	☐

Significance criteria established by CEQA Guidelines, Appendix G and County of Santa Barbara's Environmental Thresholds and Guidelines Manual, which have been adopted by the City of Goleta.

5.5.1. Setting

Approach to Analysis of Cultural Resources and Previous Cultural Resources Studies

Cultural resources reflect the history, diversity, and culture of the region and the people who created them. They are unique in that they are often the only remaining evidence of activity that occurred in the past. Cultural resources can be natural or built, purposeful or accidental, physical or intangible. They encompass archaeological, Tribal, and built environmental resources, including buildings, structures, objects, districts, and sites.

Information presented in this section, and the subsequent analysis, was based on the information presented in a report entitled *Cultural Resources Assessment Report, Greenbark 30 Battery Energy Storage Project, City of Goleta, Santa Barbara County, California* by Environmental Resources Management, Inc. (ERM) (Wiseman et al. 2025; Confidential Appendix F), unless otherwise referenced.

Cultural Resources Study Area

The Project site consists of a 2.1-acre undeveloped lot (Assessor's parcel number 079-210-053) located at the northern terminus of Viajero Drive in western Goleta, California in Santa Barbara County. The Project site is adjacent to the existing Ellwood Generating Station (EGS). The cultural resources inventory included a record search, review of historic maps, intensive pedestrian survey, and Extended Phase I testing. The record search was conducted at the California Historical Resources Information System (CHRIS) Central Coast Information Center at the Santa Barbara Museum of Natural History in March of 2023. The record search included the Project site plus a 0.25-mile buffer zone (Study Area). A review of historic General Land Office (GLO) maps, Bureau of Land Management (BLM) plat maps, USGS topographic maps and aerial photographs was conducted. Intensive pedestrian survey was conducted in May of 2023 and the Extended Phase I Testing was conducted in June of 2025.

Cultural Record Search Results

A search of the California Historical Resources Information System (CHRIS) revealed that no previous cultural resource studies have been completed within the Project site and no cultural resources have been previously recorded in the Project site. The search was performed to identify all previously recorded cultural resources, as well as previously conducted cultural resource studies, within the Project site and around it. Within the Study Area (0.25-mile buffer zone of the surrounding area) eight previous cultural resource studies have been completed and three previously identified cultural resources were identified, including two Native American resources (CA-SBA-1717, a light scatter of marine shell fragments, and

CA-SBA-3495, a low density scatter of marine shell and lithic materials) and one historic era resource (CA-SBA-3634H, a small historic site consisting of three paving stones).

Historic Map Review

Review of historic maps and aerial photos indicate that the Project site has been graded since at least 1969, although no structures are visible within the Project site from aerial photos or historic maps. Development of the neighboring lot that is the current site of the EGS facility is first visible in aerial photos from 1938 and topographic maps from 1942. Viajero Drive and additional development on neighboring lots are first visible in aerial photographs from 1972 (NETR Online 2025).

Pedestrian Survey- Methods and Results

On May 11, 2023, an intensive archaeological survey of the Project site was conducted by Sandra Pentney, M.A., RPA, and John Bergner, M.A., RPA, Cultural Resource Specialists for ERM. Pentney and Bergner utilized 10-15 meter transects to cover the entirety of the Project site with 20-40% average ground visibility.

Pentney and Bergner examined the ground surface and subsurface exposures for the presence of precontact artifacts, historic-era artifacts, sediment discolorations that could indicate the presence of cultural features, and depressions or other features that could indicate the presence of structures or foundations.

A large berm was observed along the northern boundary of the Project site, however, there are no additional features and no clear association or age of the berm. No precontact or historic-era resources were observed during the survey.

Extended Phase I Testing- Methods and Results

Due to the low surface visibility encountered during pedestrian survey and the moderate to high sensitivity of the surrounding area for cultural resources, ERM conducted Extended Phase I archaeological testing of the Project site from June 18-19, 2025.

Extended Phase I testing consisted of excavation of five test trenches in the proposed location of the battery storage infrastructure and four test trenches in the proposed location of the road. Trenches measured one meter (3.3 feet) wide by 3 meters (9.8 feet) long. The Project site is mapped as marine terrace deposits which date to the upper Pleistocene; consequently, it is unlikely that cultural materials would be present lower than 3 feet below ground level. Trench depth was determined by depth of bedrock or other physical obstructions, depth of sterile sediments, maximum depth of proposed disturbance, and the maximum depth considered safe for workers. All trenches were excavated to their proposed maximum depth: four feet in the proposed battery storage area and two feet in the proposed road area.

Trenches were excavated in 20 cm levels by a backhoe excavator; ERM archaeological monitors continuously monitored all excavation, examined sidewalls and spoils, and screened an approximate 25% sample of excavated soils through 1/8-inch mesh. Each trench was backfilled and recontoured prior to the next trench being excavated.

The results of the Extended Phase I testing were negative. No precontact or historic-era resources were observed during Extended Phase I testing.

Native American Heritage Commission Sacred Lands File Search

In April 2024, ERM requested that the Native American Heritage Commission (NAHC) complete a search of its Sacred Lands Files to determine if resources significant to Native Americans have been recorded within the Project site. On April 17, 2024, ERM received a response from the NAHC stating that the search

of its Sacred Lands file was negative for the presence of resources within the Project footprint. All Tribal outreach and formal consultation have been conducted by the City of Goleta. Please see Section 5.18 Tribal Cultural Resources for the results of consultation.

Environment

The Project site is surrounded by a mixture of industrial, commercial and residential land. The Project site is a flat, undeveloped parcel which is currently dominated by grasses (Wechter and Chartier 2024).

The Project site is situated within the Santa Barbara Coastal Plain and Terraces ecoregion, which is a flat, low elevation zone at the base of the Santa Ynez Mountains that experiences a mild climate and 20 to 23 inches of average annual precipitation.

Prehistory

Paleocoastal Period

Coastal California has been occupied for at least 12,000 years, although archaeological evidence from the Paleo-Coastal period is scant. The earliest radiocarbon dates in California come from the Santa Barbara Channel Islands south of the Project site. Artifacts of this period are indicative of a culture dependent on hunting large game, such as very large bifaces associated with atlatl and spear technology.

Millingstone Period

8000 Before Common Era (BCE) marks the beginning of the Millingstone Period, which is associated with a diversified toolset for procuring and processing a variety of animal and vegetal resources. Millingstone sites occur along the coast and inland and are often associated with stable water sources.

Hunting Culture: Early, Middle and Late Period

3500 BCE marks the transition to the hunting culture, which is further subdivided into an Early and Middle Period. The Early Period is associated with the adoption of the mortar and pestle and increased reliance on acorns, and the Middle Period is associated with the introduction of the bow and arrow. Increased sedentism, increased social stratification, and occupation of more diverse locations are also associated with this period.

1000 CE marks the beginning of the Late Prehistoric Period, which lasted until European contact in 1769. The Late Prehistoric Period is typified by population growth, increased use of inland areas, and increased cultural complexity.

Ethnography

The Project site is located within the territory of the Chumash. Linguistic anthropologists identify several regional varieties of the Chumash language family; the Project site lies within the Central Chumash language group area, specifically the region where the Barbareño dialect associated with Mission Santa Barbara was spoken (Golla 2011). At the time of European contact the Chumash lived in large, politically independent sedentary villages and used temporary seasonal camps throughout their territory. The nearest ethnographic Chumash villages to the Project site are Heliyik, Helo', 'Alkash and S'axpilil to the east and Kuya'mu and Mikiw to the west (Johnson and McLendon 1999).

The Chumash relied on a variety of terrestrial and marine resources for subsistence, and acorns were an important part of their diet. The toolkit of the Chumash was diverse, including flaked stone and groundstone tools, steatite implements, bone and shell fishhooks, nets and baskets woven from plant materials and waterproofed with asphaltum and carved wooden bowls. The Chumash utilized plank canoes called *tomols* to capture deep-sea fish and visit the Channel Islands to trade and procure resources.

Regional History

The historic period of California can be broken into three periods: the Spanish Period, the Mexican Period, and the American Period.

Spanish Period (1769 to 1821). The Spanish began establishing missions to reinforce their claims to the Mexican territory of California in 1769. The mission system endeavored to Christianize the Native Californians and transform them into Spanish citizens. The first mission established in California was Mission San Diego in 1769, and the first mission established in Chumash territory was Mission San Luis Obispo in 1772 (Grant 1978, pg. 505). The Santa Barbara Mission, which was associated with the Barbareño-speaking Chumash, was established in 1786 (Grant 1978, pg. 505). The Spanish period was a time of population decline and loss of culture for the Chumash, who were treated very poorly by the Spanish soldiers and missionaries and had no immunity to European disease. During this period Spanish families began to establish ranches in the Goleta Valley.

Mexican Period (1821 to 1848). In 1821, Mexico gained its independence from Spain and Alta California became one of the provinces of the new Republic of Mexico. The Chumash at La Purisima Mission, Santa Ynez Mission and Santa Barbara Mission staged a revolt against the mission system in 1824; the uprising resulted in the deaths of both Spanish and Chumash people (Grant 1978, 507). Some Chumash who fled remained in remote areas of the interior beyond mission control, but many returned to the missions (Grant 1978, pg. 507). After the government began to secularize the missions in 1834, a series of large land grants (ranchos) that transferred mission properties to private ownership were awarded by the various governors of California. The Project site is part of a land grant called Rancho Los Dos Pueblos, which was awarded to Nicholas Den, an Irish immigrant, in 1842 (Historic Resources Group 2021).

American Period (1848 to the Present). The United States took ownership of California as a consequence of the 1848 Treaty of Guadalupe-Hidalgo, and California became a state in 1850. Santa Barbara County was also created at this time (Historic Resources Group 2021). The beginning of the Gold Rush in the late 1840s and the completion of the transcontinental railroad in 1869 led to a flood of new settlers in California.

Many of the ranchos created during the Mexican Period were sold when rancheros ran into financial trouble, especially after a severe drought in the 1860s. The ranchos were subsequently divided up and developed into agricultural lands or towns (Historic Resources Group 2021). Rancho Los Dos Pueblos was subdivided and distributed amongst the heirs of Nicholas Den after his death in 1862 (Historic Resources Group 2021).

The population of Goleta began to grow in the late 1800's along with the oil industry, and the Southern Pacific Railroad began to serve the area in 1901. In the 1920's and 1930's Goleta was a major producer of oil in the United States (Historic Resources Group 2021). The City of Goleta continued to grow through the 1900's but was not incorporated until 2002.

5.5.2. Regulatory Background

State

California Environmental Quality Act. The California Environmental Quality Act (CEQA) establishes that historical and archaeological resources must be afforded consideration and protection (14 CCR Section 21083.2, 14 CCR Section 15064.5). CEQA Guidelines define significant cultural resources under two regulatory designations: historical resources and unique archaeological resources.

A historical resource is a "resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the CRHR" or "a resource listed in a local register of historical resources or iden-

tified as significant in a historical resources survey meeting the requirements of Section 5024.1(g) of the Public Resources Code;” or “any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided the agency’s determination is supported by substantial evidence in light of the whole record.” (14 CCR Section 15064.5[a][3]).

An archaeological artifact, object, or site can meet CEQA’s definition of a unique archaeological resource even if it does not qualify as a historical resource (PRC 21083.2[g]; 14 CCR 15064.5[c][3]).

Local

City of Goleta. The City of Goleta’s Historic Preservation & Archaeological and Tribal Cultural regulations are codified as Chapters 17.33 and 17.43 of the Goleta Municipal Code (Ordinance No. 22-05), which established a Historic Preservation Commission (Section E) and a Historic Resources Inventory and seven local Landmark designations (Section G), as well as establishing standards for the protection of Archaeological Resources and Tribal Cultural Resources within the City of Goleta (Section H).

The definition adopted as part of Ordinance No. 22-05, defines an Archaeological Resource as “[a]n artifact, object, or site constituting material remains of past human life or activities” and Tribal Cultural Resources “...include Native American archaeological sites and area of natural landscape that have traditional cultural significance.” Further, pursuant to Public Resources Code section 21074(a), a resource that consists of sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe that are:

- (a) Included in or determined to be eligible for inclusion in the California Register of Historical Resources (CRHR);
- (b) Included in a local register of historical resources; or
- (c) Determined by the lead agency, in its discretion and supported with substantial evidence, to be significant on the basis of criteria for listing in the CRHR after the lead agency takes into consideration the significance to the Tribe(s)” (City of Goleta Ordinance No. 22-05, 2022).

5.5.3. Environmental Impacts and Mitigation Measures

Thresholds of Significance

A significant impact on cultural resources would occur if a proposed Project resulted in any of the impacts noted in the above checklist (Section 5.5). Additional thresholds are contained in the County of Santa Barbara’s Environmental Thresholds and Guidelines Manual (2021), which has been adopted by the City of Goleta.

The City’s adopted thresholds are identical to the CEQA Appendix G checklist questions, with the addition of one threshold, which indicates that a project would result in a significant impact on a cultural resource if it results in the physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of such a resource would be materially impaired. The City of Goleta defines the significance of a cultural resource and potential impacts to significance as follows:

“The significance of a cultural resource and impacts to the resource is determined by whether that resource can increase the collective knowledge regarding the past. The primary determining factors are site content and degree of preservation.”

The physical demolition, destruction, relocation or alteration of a resource or its immediate surroundings would constitute a substantial adverse change to the resource; therefore, the City’s adopted thresholds are considered in the following Impact Analysis.

Impact Analysis

a. *Would the project cause a substantial adverse change in the significance of an historical resource pursuant to §15064.5 [§15064.5 generally defines historical resource under CEQA]?*

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED. The record search, intensive pedestrian survey, and Extended Phase I testing did not identify any known historical resources in the Project site. However, ground disturbing activity, such as grading, trenching, or excavations, has the potential to impact unknown buried resources that may be considered significant under CEQA or local regulations. Implementation of Mitigation Measures (MMs) C-1, C-2, and C-3, described below, would reduce impacts to unknown resources to a less than significant level.

MM C-1 Cultural Resources Awareness Training. Prior to the initiation of construction, all construction personnel shall be trained by an archaeologist qualified under 36 Code of Federal Regulations⁶¹ regarding the recognition of possible buried cultural resources (i.e., Native American and/or historical artifacts, objects, or features) and protection of all archaeological resources during construction. Training shall inform all construction personnel of the procedures to be followed upon the discovery of cultural materials. All personnel shall be instructed that unauthorized removal or collection of artifacts is a violation of state law. Any excavation contract (or contracts for other activities that may have subsurface soil impacts) shall include clauses that require construction personnel to attend the Workers' Environmental Awareness Program, so they are aware of the potential for inadvertently exposing buried archaeological deposits.

MM C-2 Inadvertent Discovery of Historical Resources, Unique Archaeological Resources, or Tribal Cultural Resources. If previously unidentified cultural resources are uncovered during construction activities, construction work within 50 feet of the find shall be halted and directed away from the discovery until an archaeologist qualified by the Secretary of the Interior assesses the significance of the resource, in consultation with consulting Tribe(s), and makes a recommendation to the City of Goleta.

The archaeologist, in consultation with the City of Goleta, consulting Tribe(s), and any other responsible public agency, shall make the necessary plans for treatment of the find(s) and for the evaluation and mitigation of impacts if the find(s) is found to be eligible to the California Register, local register or qualify as a unique archaeological resource or a TCR under CEQA (PRC §21083.2).

MM C-3 Treatment of Human Remains. Any human remains discovered in the Project site are to be treated with respect and dignity. Per Public Resources Code Section 5097.98(b), upon discovery of human remains, the following must occur: all work within 50 feet of the discovery area must cease immediately, nothing in the Project site is to be disturbed, and the area must be secured.

Per Health and Safety Code section 7050.5, the County Coroner's Office must be called in the event of an inadvertent discovery of human remains. The Coroner has two working days to examine the remains after notification. The appropriate land manager/owner of the site is to be called and informed of the discovery. It is very important that the suspected remains, and the area around them, are undisturbed and the proper authorities called to the scene as soon as possible, because it could be a crime scene. The Coroner would determine if the remains are archaeological/historic or of modern origin and if there are any criminal or jurisdictional questions. After the Coroner has determined that the remains are archaeological/historic-era, the Coroner would make recommendations

concerning the treatment and disposition of the remains to the person responsible for the excavation, or to his or her authorized representative. If the Coroner believes the remains to be those of a Native American, the Coroner shall contact the Native American Heritage Commission (NAHC) by telephone within 24 hours.

Per Public Resources Code section 5097.98, the NAHC would immediately notify the person it believes to be the most likely descendant (MLD) of the remains. The MLD has 48 hours from the time given to access the site to make recommendations to the landowner for treatment or disposition of the human remains. If the descendant does not make recommendations within 48 hours, the landowner shall reinter the remains in an area of the property secure from further disturbance. If the landowner does not accept the descendant's recommendations, the owner or the descendant may request mediation by NAHC.

According to the California Health and Safety Code, six or more human burials at one location constitute a cemetery (Section 8100), and willful disturbance of human remains is a felony (Section 7052).

b. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED. The record search, intensive pedestrian survey, and Extended Phase I testing did not identify any known archaeological resources in the Project site. However, ground-disturbing activity, such as grading, trenching, or excavations, has the potential to impact unknown buried resources that may be considered a unique archaeological resource per CEQA. Implementation of MMs C-1, C-2, and C-3 would reduce impacts to unknown resources to a less than significant level.

c. Would the project disturb any human remains, including those interred outside of formal cemeteries?

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED. No known human remains, or informal, undocumented cemeteries were identified within the Project site as a result of the record search, archival research, NAHC Sacred Lands File Search, intensive pedestrian survey or Extended Phase I testing. In the unlikely event unknown buried human remains are encountered during ground disturbing activity, the implementation of MMs C-1 and C-3 would reduce potential impacts to a less than significant level.

5.5.3.1. Impact Conclusions and Mitigation Measures

The proposed Project would result in potentially significant impacts to cultural resources. With implementation of mitigation measures C-1 through C-3, impacts would be reduced to a less than significant level.

5.6. Energy

ENERGY				
Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
(b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

Significance criteria established by CEQA Guidelines, Appendix G.

5.6.1. Setting

The proposed Project would construct and operate a BESS facility and 66 kV interconnection line. Battery energy storage units would be charged from the electrical grid and would discharge as a California Independent System Operator (CAISO) market participant. An interconnection application was approved by Southern California Edison (SCE) and the BESS interconnection studies are underway. It is anticipated that the BESS would interconnect to the existing SCE 66-kV electrical transmission line that runs along Las Armas Road.

In June 2021, the CPUC approved a decision ordering utilities to procure 11.5 gigawatts of new zero-emitting electricity resources to come online between 2023 and 2026, since battery energy storage will be needed to achieve California's clean energy goals. The proposed Project would supplement SCE's power supply by receiving electricity through the existing power grid system, including power generated from solar and wind sources, and storing the energy until it is needed during peak demand periods. The BESS facility would also support electricity grid resiliency in the event of an emergency or disaster and would replace electricity generation capacity in the event the Ellwood Generating Station (EGS) is retired. The EGS natural gas peaking plant is currently used to supplement the region's peak power demand requirements.

The energy sources that make up the mix of power supplied to SCE's customers, relative to the 2023 California power mix, are summarized from utility-specific Power Content Label data gathered by the California Energy Commission shown in Table 5.6-1 (CEC, 2024).

Table 5.6-1. Energy Sources of Electricity Supplied to Customers (2023 Power Content)

Energy Resources	SCE Power Mix	SCE Community Renewable	2023 California Power Mix
Eligible Renewable	37.6%	64.6%	36.9%
Biomass & biowaste	0.1%	0.1%	2.1%
Geothermal	5.2%	3.0%	4.8%
Eligible hydroelectric	0.7%	0.4%	1.8%
Solar	19.8%	54.5%	17.0%
Wind	11.7%	6.6%	11.2%
Coal	0.0%	0.0%	1.8%
Large Hydroelectric	4.5%	2.5%	11.7%
Natural Gas	20.0%	11.3%	36.6%
Nuclear	9.1%	5.1%	9.3%
Other	0.1%	0.0%	0.1%
Unspecified sources of power*	28.8%	16.4%	3.7%
Total	100%	100%	100%

* "Unspecified sources of power" means electricity from transactions that are not traceable to specific generation sources.
Source: CEC 2023a, 2023 Power Content Label for SCE.

5.6.2. Regulatory Background

Energy Action Plan and Loading Order. California has mandated and implemented aggressive energy-use reduction programs for electricity and other resources. In 2003, California's first Energy Action Plan (EAP) established a high-level, coherent approach to meeting California's electricity and natural gas needs and set forth the "loading order" to address California's future energy needs. The "loading order" established that the state, in meeting its energy needs, would invest first in energy efficiency and demand-side resources, followed by renewable resources, and only then in clean conventional electricity supply (CPUC, 2008). Since that time, the California Public Utilities Commission (CPUC) and California Energy Commission (CEC) have overseen the plans, policies, and programs for prioritizing the preferred resources, including energy efficiency and renewable energy.

California's Renewables Portfolio Standard (RPS). Electric utilities in California must procure a minimum quantity of the electricity sales from eligible renewable energy resources as specified by RPS requirements. The most-recent update to the RPS targets was set forth in 2018 with the "100 Percent Clean Energy Act of 2018" [Senate Bill 100 (SB 100)], which establishes the policy that eligible renewable energy resources and zero-carbon resources supply 100 percent of retail sales of electricity to California end-use customers by December 31, 2045. SB 100 requires the CPUC and CEC to ensure that implementation of this policy does not cause or contribute to greenhouse gas emissions increases elsewhere in the western grid.

Integrated Resource Planning. An Integrated Resource Plan (IRP) is an electricity system planning document that lays out the energy resource needs, policy goals, physical and operational constraints, and the general priorities or proposed resource choices of an electric utility, including customer-side preferred resources. Through Senate Bill 350 (De León, Chapter 547, Statutes of 2015) (SB 350), the publicly owned utilities (POU) such as SCE must adopt and file an IRP that is subject to a review by the CEC for consistency with statewide targets for energy efficiency, renewable resources, and greenhouse gas emissions reductions. The IRP must also consider how renewable generation, grid operational efficiencies, energy storage, and distributed resources (including energy efficiency) serve to meet the peak hour energy and reliability needs.

Energy Storage Targets. Assembly Bill 2514 (Skinner, Chapter 469, Statutes of 2010) (AB 2514), amended by Assembly Bill 2227 (Bradford, Chapter 606, Statutes of 2012), requires California's publicly owned utilities to develop energy storage procurement targets. Partially in response to these requirements, SCE released measures in the Clean Power and Electrification Pathway including expanding transmission and distribution infrastructure to accommodate large-scale and distributed generation and adding up to 10 GW of energy storage for grid balancing, in addition to current mandates.

State CEQA Guidelines. The California Natural Resources Agency adopted certain amendments to the State CEQA Guidelines effective in 2019 to change how CEQA Lead Agencies consider the environmental impacts of energy use. CEQA Guidelines Section 15126.2(b) and CEQA Appendix F require analysis of a project's energy use, in order to ensure that energy implications are considered in Project decisions. CEQA requires a discussion of the potential environmental effects of energy resources used by projects, with particular emphasis on avoiding or reducing the "wasteful, inefficient, and unnecessary consumption of energy" (see Public Resources Code section 21100(b)(3)).

City of Goleta

In July of 2014, the City of Goleta adopted the Climate Action Plan to identify measures to meet GHG reduction targets. In 2019, it adopted the Strategic Energy Plan to meet its 100 percent renewable electricity supply for the community by 2030 goal, which was unanimously adopted in December 2017 by the City of Goleta City Council. The Strategic Energy Plan is a partnership between the City of Goleta, City of Carpinteria, and County of Santa Barbara to meet the 100 percent renewable electricity goal and

improve resiliency of the local electricity system. The Strategic Energy Plan includes recommendations for increased battery storage to achieve electricity bill reductions and provide backup capacity for shorter outages, increasing electricity resiliency.

5.6.3. Environmental Impacts and Mitigation Measures

Thresholds of Significance

Thresholds of significance for energy use have not been established 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). The proposed Project would be expected to have a significant impact on energy use if it demonstrably resulted in wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation or conflict or obstruct a plan for renewable energy or energy efficiency as discussed in the CEQA Guidelines Appendix G Checklist above.

Impact Analysis

(a) Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

LESS THAN SIGNIFICANT. The proposed Project would construct, operate, and maintain a BESS facility and 66 kV interconnection line. The objectives of the proposed Project are to increase the reliability and flexibility of SCE's electrical grid and to help solve California's "duck curve" power production problem. The proposed Project would achieve these objectives by utilizing the BESS to store energy. The proposed Project would allow SCE to store energy and discharge it to the electrical grid during periods of high demand.

Energy storage would improve SCE's ability to efficiently integrate renewable resources. The growth of zero-carbon resources, especially solar resources, has shifted the reliability concerns from the peak hour (hour with the highest energy demand) to net peak hours (hours when energy demand minus wind and solar generation is largest). The changing resource mix is driving a change in the characteristics of the electricity system and requires consideration of the net demand curve, total electricity demand less the wind and solar generation. The "duck curve" is characterized by more drastic increases in net demand in the evening hours as solar decreases, and a net peak that occurs later in the evening when solar generation is substantially diminished or nonexistent (CEC, 2022). By charging during low net demand periods and discharging in higher net demand periods, the proposed Project would increase SCE's ability to use renewable energy when demand is highest.

Construction activity associated with the proposed Project would require the consumption of fossil fuel resources. For example, diesel fuel and gasoline to power the off-road construction equipment and construction vehicles. Additionally, construction would require the manufacture and delivery of new equipment and materials, which would require energy use. Decommissioning of the Project would require similar activities as construction, and therefore impacts due to decommissioning are similar to impacts due to construction.

Operation and maintenance of the proposed Project components would also require use of fossil fuel resources for routine upkeep. Operation of the BESS also consumes energy through round-trip losses. The ratio of discharged to charged energy over the course of one full cycle, or round-trip efficiency, would be approximately 85 percent for the proposed lithium iron phosphate (LFP) battery modules (DOE, 2023).

The Project would supplement SCE's power supply by receiving electricity through the existing power grid system, including power generated from solar and wind sources, and storing the energy until it is needed during peak demand periods. The BESS facility would also support electricity grid resiliency in the event of an emergency or disaster and would replace electricity generation capacity in the event of EGS

retirement. The EGS peaking plant is currently used to supplement the region's peak power demand requirements. As a result, the energy discharged by the BESS would be likely to displace the use of fossil fuel resources during periods of high demand.

The energy resources used by the proposed Project during construction, operation, and decommissioning, including both renewable and non-renewable sources of electricity in the power mix, and petroleum products in vehicles, would not be wasteful, inefficient, or unnecessary in light of the new facilities that would increase capacity and system reliability. No potentially significant environmental impact would occur due to the direct or indirect consumption of energy resources by the proposed Project.

(b) Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

LESS THAN SIGNIFICANT. The proposed Project would construct, operate, maintain, and eventually decommission a BESS facility and 66 kV interconnection line. The proposed Project would be interconnected to SCE's existing system and would increase the reliability and flexibility of SCE's electrical grid. Energy storage provides benefits to utilities by efficiently integrating increased amounts of renewable energy resources into the electrical transmission and distribution grid in a manner that can avoid use of fossil fuel resources during peak hours and minimize GHG emissions. The City of Goleta's 2019 Strategic Energy Plan set out measures to achieve their 2017 goal of achieving 100 percent renewable electricity supply for the community by 2030. In the 2020 IRP SCE includes a proposed reliability methodology "centered on ensuring [load-serving entities] provide sufficient capacity to meet their net peak load and provide sufficient energy to meet their net load duration curve and charge any energy storage used to meet their needs" (SCE, 2020). The proposed Project would contribute to SCE's efforts to achieve the benefits of energy storage on the electrical grid and would contribute to the City's goals for 100 percent renewable electricity use and increased energy storage. The proposed Project would not conflict with any state or local plan for prioritizing renewable energy or energy efficiency. Impacts would be less than significant.

5.6.3.1. Impact Conclusions and Mitigation Measures

The proposed Project would not result in significant energy impacts, and thus, no mitigation measures are recommended.

5.7. Geology and Soils

GEOLOGY AND SOILS				
Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:	☐	☐	☐	☐
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☐	☒
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv) Landslides?	☐	☐	☐	☒
(b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
(c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
(d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
(e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
(f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

*Geology and Soils question (d) reflects the current 2022 California Building Code (CBC), which is based on the International Building Code (2021), effective January 1, 2023. The CBC is updated every three years.
Significance criteria established by CEQA Guidelines, Appendix G.

5.7.1. Setting

This section describes geology, soils, and seismic conditions and analyzes the environmental impacts related to geologic and seismic hazards that could result from the implementation of the proposed Project. The following discussion addresses existing environmental conditions in the affected area, identifies and analyzes environmental impacts, and recommends measures to reduce or avoid any adverse impacts anticipated from Project construction, operation, and decommissioning. In addition, existing laws and regulations relevant to geologic and seismic hazards are described. In some cases, compliance with these existing laws and regulations would serve to reduce or avoid certain impacts that might otherwise occur with the implementation of the Project.

Baseline geologic, seismic, and soils information were collected for the Project site and surrounding area from published and unpublished literature, GIS data, and online sources. Data sources included geologic literature from the U.S. Geological Survey and California Geological Survey, and other readily available online reference materials. The study area was defined as the Project site and the areas immediately adjacent to the proposed Project for most geologic and soils issue areas with the exception that the study area related to seismically induced ground shaking includes significant regional active and potentially active faults within 50 miles of the proposed Project.

5.7.1.1. Regional Geologic Setting

The proposed Project site is located in the Goleta Valley, a coastal plain in southern Santa Barbara County that lies between the Santa Ynez Mountains and the Pacific Ocean. Santa Barbara County lies partly in the Transverse Range geomorphic province and partly in the southern Coast Range province. The boundary between these two provinces is usually drawn along the Santa Ynez River. The Transverse Ranges of the County include the Santa Ynez Range, the Santa Barbara Channel offshore, and the Channel Islands (Santa Barbara County, 2023, p. 16). The Santa Ynez Mountains consist mainly of variably deformed and faulted marine and nonmarine sedimentary rocks and deposits that range in age from Jurassic to the present (LGC, 2024 – Appendix G [Geotechnical Report], p. 4).

The County is underlain mainly by marine sedimentary rocks of late Mesozoic and Cenozoic ages. Commonly found sedimentary rocks include thick sandstone, shale with lesser amounts of conglomerate, alluvial fan deposits, and dune sand (Santa Barbara County, 2023, p. 17). Fanglomerate, or older alluvium, is a type of conglomerate rock that is made up of similarly-sized rock fragments deposited in alluvial fans. The fanglomerate which occurs discontinuously in the lower foothills of the Santa Ynez Range is characterized by boulders and cobbles. The Santa Barbara formation, which occurs in patches on the coastal hills and in the lower foothills of Goleta, is weakly cemented and prone to being gullied and washed wherever the protective vegetative cover is removed (Santa Barbara County, 2023, p. 24). The local geology has also been influenced by a drop in sea level resulting in a series of abandoned terrace deposits, both marine and non-marine (LGC, 2024 - Appendix G [Geotechnical Report], p. 4).

5.7.1.2. Local Geology

The City of Goleta lies within the Goleta Valley, a relatively flat and narrow coastal plain. California Geological Survey (CGS, 2022) mapping shows the City is primarily situated on late Holocene alluvial fan deposits (Qf), undifferentiated surficial deposits (Qsu), and lacustrine, playa, and estuarine deposits (Ql); late to middle Pleistocene old marine terrace deposits (Qot) and old alluvial valley deposits (Qoa); and fine-grained Quaternary age bedrock formations of Pleistocene age and younger (Qsh). Late Holocene eolian and dune deposits (Qe) and beach deposits (Qb), along with fine-grained Tertiary age bedrock formations (Tsh), underlie Goleta's coastline with the Pacific Ocean. The proposed Project site is situated on old marine terrace deposits (Qot) (CGS, 2022).

LGC Geotechnical, Inc (LGC) conducted geologic mapping and a subsurface geotechnical evaluation consisting of five infiltration borings for the proposed Project site. The typical onsite characteristics of the materials are described as follows, from youngest to oldest (LGC, 2024 - Appendix G [Geotechnical Report], p. 4-5):

- **Artificial Fill (Not Mapped).** Minor amounts of undocumented fill material may be present in the near-surface of the site. The extent of the undocumented fill has not been mapped due to its thin nature and lack of lateral continuity. For the purposes of the geotechnical evaluation report, the undocumented fill material is not differentiated from the weathered, upper portion of the terrace deposits.
- **Quaternary Terrace Deposits.** Quaternary terrace deposits were encountered at the surface and extend to a depth of approximately 10 to 15 feet below the surface. The terrace deposits overlie the Tertiary Monterey Formation bedrock. The terrace materials consist of generally hard, sandy, silty clay. In general, the basal portion of the terrace, originally deposited on a wave-cut platform into the Capistrano Formation bedrock, is composed of ancient beach deposits consisting of medium to coarse sand and some gravel.
- **Tertiary Monterey Formation.** Tertiary Monterey Formation bedrock underlies the entire site at depth. This material generally consists of massive to thinly bedded hard sandy and silty claystone and very dense clayey and silty sandstone.

5.7.1.3. Soils

Soils within the Project site and the immediate surroundings reflect the underlying rock type, the extent of weathering of the rock, the degree of slope, and the degree of human modification. The Project site is entirely underlain by Milpitas-Positas fine sandy loams, 2 to 9 percent slopes (NRCS, 2025). The soil unit composition is about 45 percent Milpitas, 35 percent Positas, and 20 percent minor components. This soil unit is moderately well drained with a very high surface runoff class, which means it has a very slow water infiltration rate when thoroughly wet (NRCS, 2025).

Expansive soils are characterized by their ability to undergo significant volume change (shrink and swell) due to variations in soil moisture content. Changes in soil moisture can result from rainfall, landscape irrigation, utility leakage, roof drainage, and/or perched groundwater. Expansive soils are typically very fine grained with a high to very high percentage of clay. Such soil conditions can affect the structural integrity of buildings and other structures. Soils with moderate to high shrink-swell potential would be classified as expansive soils. NRCS reports the expansion potential of the Milpitas-Positas fine sandy loams, 2 to 9 percent slopes soil underlying the Project site is moderate (NRCS, 2025). The soil unit has a low linear extensibility rating, with linear extensibility below 3 percent (NRCS, 2025). Expansion Index (EI) testing conducted by LGC as part of the geotechnical site evaluation indicated EI values of 19 and 64, corresponding to “Very Low” and “Medium” expansion potential (LGC, 2024 - Appendix G [Geotechnical Report], p. 9).

Weak (loose or poorly consolidated) soils can compress, collapse, or spread laterally under the weight of buildings and fill, causing settlement relative to the thickness of the weak soil. Usually, the thickness of weak soil would vary and differential settlement would occur. Weak soils also tend to amplify shaking during an earthquake and can be susceptible to liquefaction, as discussed further in sections below. The NRCS soil report rates the soil unit’s susceptibility to compaction as “Medium,” meaning the potential for compaction is significant, and the growth rate of seedlings may be reduced following compaction (NRCS, 2025). After the initial compaction (i.e., the first equipment pass), this soil is able to support standard equipment with only minimal increases in soil density. The soil is intermediate between moisture insensitive and moisture sensitive (NRCS, 2025).

Potential soil erosion hazards vary depending on the use, conditions, and textures of the soils. The properties of soil that influence erosion by rainfall and runoff are those that affect the infiltration capacity of a soil, and those that affect the resistance of a soil to detachment and being carried away by falling or flowing water. Additionally, soils on steeper slopes would be more susceptible to erosion due to the effects of increased surface flow (runoff) on slopes where there is little time for water to infiltrate before runoff occurs. Soils containing high percentages of fine sands and silt and that are low in density, are generally the most erodible. With increasing clay and organic matter content of these soils, the potential for erosion decreases. Clays act as a binder to soil particles, thus reducing the potential for erosion. The Milpitas component of the soil unit is 69 percent sand, 16 percent silt, and 15 percent clay. The Positas component of the soil unit is 68 percent sand, 21 percent silt, and 11 percent clay. The proposed Project site has a wind erodibility group (WEG) rating of 5, indicating a moderate WEG factor where 1 is the most susceptible and 8 is the least susceptible to wind erosion. Furthermore, the water erosion factor (K_w) is 0.15 for Milpitas and 0.24 for Positas, indicating a low-to-moderate susceptibility to water erosion (where 0.02 is the least susceptible and 0.69 is the most susceptible) (NRCS, 2025).

5.7.1.4. Subsidence

Land subsidence can occur in valleys containing aquifer systems that are, in part, made up of fine-grained sediments and that have undergone extensive groundwater withdrawal. As the groundwater is withdrawn, the pore-fluid pressure in the sediments decreases allowing the weight of the overlying sediment to permanently compact or compress the fine-grained units. This effect is most pronounced in younger,

unconsolidated sediments. Land subsidence is generally characterized by a broad zone of deformation where differential settlements are small. The main cause of subsidence in California is groundwater pumping. The effects of subsidence include damage to buildings and infrastructure, increased flood risk in low-lying areas, and lasting damage to groundwater aquifers and aquatic ecosystems (USGS, 2025a).

Interferometric Synthetic Aperture Radar (InSAR) data used to evaluate land subsidence consist of relative displacement measurements—typically reported in millimeters or centimeters—along a satellite’s line-of-sight between two or more temporal observations, where negative values (movement away from the satellite) generally indicate subsidence and positive values (movement toward the satellite) suggest uplift. InSAR data for the proposed Project site shows a positive rather than negative displacement value (increased between 0.09 and 0.11 feet) for the time period of June 13, 2015 to January 1, 2025 (DWR, 2025). Therefore, little to no subsidence has occurred in the past 10 years. Furthermore, soils that are not organic are rated “mineral soil,” which are soils that do not subside due to organic matter oxidation – the chemical process that occurs when organic matter decomposes (NRCS, 2025). Organic matter oxidation reduces soil volume, which leads to subsidence. Milpitas-Positas fine sandy loams, 2 to 9 percent slopes are rated as “mineral soil” and have a subsidence rating of 0, meaning they are not at risk of subsiding as a result of the drainage of wet soil (NRCS, 2025).

5.7.1.5. Slope Stability

Important factors that affect the slope stability of an area include the steepness of the slope, the relative strength of the underlying rock material, and the thickness and cohesion of the overlying colluvium and alluvium. The steeper the slope and/or the less strong the rock, the more likely the area is susceptible to landslides. The steeper the slope and the thicker the colluvium, the more likely the area is susceptible to debris flows. Another indication of unstable slopes is the presence of old or recent landslides or debris flows.

Slope-failure hazards such as landslides and rockfalls are generally confined to areas with steep (greater than 25-percent) slopes and unstable soils. Areas within Goleta that may be susceptible to slope failure include coastal bluffs, steep stream banks, railroad and road cuts, and areas north of Cathedral Oaks Road with steep ground slopes. The Rincon geologic formation is susceptible to landslides, but outcrops of this formation are limited to portions of northwestern and northeastern Goleta (City of Goleta, 2006a, p. 5-4). According to landslide hazard mapping compiled by the City of Goleta, the proposed Project site is not within a landslide hazard zone (City of Goleta, 2006a – Figure 5-1).

The topography of the site and surrounding area is generally flat, and the proposed Project site slopes from north to south from elevations of approximately 115 feet above mean sea level to elevations of approximately 102 feet above mean sea level (LGC, 2024 - Appendix G [Geotechnical Report], p. 1). LGC’s research and field observations do not indicate the presence of landslides on the site or in the immediate vicinity. Review of regional geologic maps of the area do not indicate the presence of known or suspected landslides in the vicinity of the site. Therefore, the possibility of landslides at the site is considered nil (LGC, 2024 - Appendix G [Geotechnical Report], p. 5).

5.7.1.6. Seismicity

Per the Alquist-Priolo Act (A-P Act), seismic faults can be classified as Holocene active, Pre-Holocene, Age-undetermined, or inactive, based on the following criteria (CGS, 2018):

- Holocene-active faults: Faults that have moved during the past 11,700 years. This age boundary is an absolute age (number of years before present) and is not a radiocarbon (^{14}C) age determination, which requires calibration in order to derive an absolute age.

- **Pre-Holocene faults:** Faults that have not moved in the past 11,700 years, thus do not meet the criteria of “Holocene-active fault” as defined in the A-P Act and State Mining and Geology Board regulations. This class of fault may be still capable of surface rupture but is not regulated under the A-P Act. Depending on available site-specific and regional data such as proximity to other active faults, average recurrence, variability in recurrence, the timing of the most recent surface rupturing earthquake, and case studies from other surface rupturing earthquakes, the Project geologist may, but is not required to, recommend setbacks. Engineered solutions can also be considered by a licensed engineer operating within his or her field of practice.
- **Age-undetermined faults:** Faults where the recency of fault movement has not been determined. Faults can be “age-undetermined” if the fault in question has simply not been studied in order to determine its recency of movement. Faults can also be age-undetermined due to limitations in the ability to constrain the timing of the recency of faulting. Examples of such faults are instances where datable materials are not present in the geologic record, or where evidence of recency of movement does not exist due to stripping (either by natural or anthropogenic processes) of Holocene-age deposits. Within the framework of the A-P Act, age-undetermined faults within regulatory Earthquake Fault Zones are considered Holocene-active until proved otherwise.
- **Inactive:** A fault may only be presumed to be inactive based on satisfactory geologic evidence; however, the evidence necessary to prove inactivity sometimes is difficult to obtain and locally may not exist.

Although it is difficult to quantify the probability that an earthquake would occur on a specific fault, this classification assumes that if a fault has moved during the Holocene epoch, it is likely to produce earthquakes in the future and is considered an active fault.

The proposed Project site is located between two pre-Holocene faults, the Glenn Annie Quaternary fault (age undifferentiated) and the More Ranch Late Quaternary fault (displaced during the past 700,000 years) (CGS, 2015). The geotechnical evaluation performed by LGC found that the proposed Project site is not located within an Alquist-Priolo Earthquake Fault Zone and identified no active faults on or near the site (LGC, 2024 - Appendix G [Geotechnical Report], p. 6).

5.7.1.7. Fault Rupture

Fault rupture is the surface displacement that occurs when movement on a fault deep within the earth breaks through to the surface. Fault rupture and displacement almost always follows preexisting faults, which are zones of weakness; however, not all earthquakes result in surface rupture (i.e., earthquakes that occur on blind thrusts do not result in surface fault rupture). Rupture may occur suddenly during an earthquake or slowly in the form of fault creep. In addition to damage caused by ground shaking from an earthquake, fault rupture is damaging to buildings and other structures due to the differential displacement and deformation of the ground surface that occurs from the fault offset leading to damage or collapse of structures across this zone.

The site is not located within a mapped State of California Earthquake Fault-Rupture Hazard Zone per compiled maps released by the CGS (2018), and there are no known active or potentially active faults on-site (LGC, 2024 - Appendix G [Geotechnical Report], p. 4). Thus, the possibility of damage due to ground rupture is considered low since no active faults are known to cross the site (LGC, 2024 - Appendix G [Geotechnical Report], p. 6).

5.7.1.8. Ground Shaking

An earthquake is classified by the amount of energy released, which traditionally has been quantified using the Richter scale. Recently, seismologists have begun using a Moment Magnitude (M) scale because it provides a more accurate measurement of the size of major and great earthquakes. For earthquakes of

less than M 7.0, the Moment and Richter Magnitude scales are nearly identical. For earthquake magnitudes greater than M 7.0, readings on the Moment Magnitude scale are slightly greater than a corresponding Richter Magnitude. Six earthquakes of M 5.5 or higher have occurred within 50 miles of the proposed Project site since 1900, including four earthquakes of M 5.5 to 6.0 (USGS, 2025a). There were two larger earthquakes, including a M 6.8 in Santa Barbara in 1925, and a M 6.9 in Lompoc in 1927 (USGS, 2025a).

The intensity of the seismic shaking, or strong ground motion, at the Project site during an earthquake is dependent on the distance between the site and the epicenter of the earthquake, the magnitude of the earthquake, and the geologic conditions underlying and surrounding the Project site. Earthquakes occurring on faults closest to the Project site would most likely generate the largest ground motion. Earthquake damage resulting from ground shaking is determined by several factors: the magnitude of an earthquake, depth of focus, distance from the fault, intensity and duration of shaking, local groundwater and soil conditions, presence of hillsides, structural design, and the quality of workmanship and materials used in construction. The USGS National Seismic Hazard Maps (NSHM) were used to estimate approximate peak ground accelerations (PGAs) in the proposed Project site. The NSHMs depict PGAs with a 2 percent probability of exceedance in 50 years which corresponds to a return interval of 2,475 years and for a maximum considered earthquake.

The City is located in a region prone to earthquakes and characterized by a moderate to high ground shaking hazard (City of Goleta, 2006a, p. 5-3). The estimated approximate PGA from large earthquakes for the Project site is 1.0504 g (acceleration due to gravity), which corresponds to very strong seismically induced ground shaking (USGS, 2025b).

5.7.1.9. Liquefaction

Liquefaction is the phenomenon in which saturated granular sediments temporarily lose their shear strength during periods of earthquake-induced strong ground shaking. The susceptibility of a site to liquefaction is a function of the depth, density, and water content of the granular sediments and the magnitude and frequency of earthquakes in the surrounding region. Studies indicate that saturated, loose near surface cohesionless soils exhibit the highest liquefaction potential, while dry, dense, cohesionless soils and cohesive soils exhibit low to negligible liquefaction potential (LGC, 2024 – Appendix G [Geotechnical Report], p. 7). In addition, densification of the soil resulting in vertical settlement of the ground can also occur. In order to determine liquefaction susceptibility of a region, three major factors are considered: the density and textural characteristics of the alluvial sediments; the intensity and duration of ground shaking; and the depth to groundwater.

Lateral spreading is a type of liquefaction induced ground failure associated with the lateral displacement of surficial blocks of sediment resulting from liquefaction in a subsurface layer. Once liquefaction transforms the subsurface layer into a fluid mass, gravity plus the earthquake inertial forces may cause the mass to move down-slope towards a free face (such as a river channel or an embankment). Lateral spreading may cause large horizontal displacements and such movement typically damages pipelines, utilities, bridges, and structures.

According to liquefaction hazard mapping by Santa Barbara County, the proposed Project site is not located in a liquefaction zone (Santa Barbara County, 2025). Additionally, in the geotechnical evaluation for the proposed Project, LGC encountered terrace deposits over dense/hard bedrock of the Tertiary Monterey Formation. These soils, due to their apparent density and consistency (as indicated by high blow counts from Standard Penetration Tests, which reflect the number of hammer strikes needed to penetrate the soil), are not considered susceptible to liquefaction and liquefaction-induced settlement. LGC found the potential for liquefaction at the proposed Project site to be considered very low (LGC 2024, - Appendix G [Geotechnical Report], p. 7)

Due to the very low potential for liquefaction, the project site's potential for lateral spreading is considered very low (LGC, 2024 - Appendix G [Geotechnical Report], p. 7).

Paleontology

Paleontological resources are the fossilized remains of organisms from prehistoric environments found in geologic strata. These are valued for the information they yield about the history of the earth and its past ecological settings. According to the City of Goleta General Plan EIR, the city is situated on alluvial fan deposits of the Quaternary age (Pleistocene and Holocene) and marine terrace deposits of the Quaternary (Pleistocene) and Neogene (Pliocene and Miocene) ages (City of Goleta, 2006b – Table 3.5-1). Geologic units of Holocene epoch are generally not considered sensitive for paleontological resources, because biological remains younger than 10,000 years are not usually considered fossils.

Older alluvium of the Quaternary age has the potential for scattered occurrences of terrestrial mammal fossils in the western half of the City of Goleta. A 1.5-acre outcrop of the Santa Barbara formation of the Pleistocene epoch has the potential for well-preserved marine mollusks, vertebrates, birds, and marine mammals, located 800 feet east of the Cathedral Oaks and Fairview intersection. The Sisquoc formation of the Pliocene epoch has the potential for microfossils, invertebrates, marine mammals, and bony fish where exposed on the seacliff in the Ellwood Mesa area at the western edge of the city. Finally, the Monterey and Rincon formations of the Miocene epoch have the potential for microfossils, invertebrates, marine mammals, and bony fish where exposed at the Ellwood Mesa seacliff and in the foothills north of the Cathedral Oaks and Fairview intersection (City of Goleta, 2006b – Table 3.5-1).

The Project site is underlain by Quaternary marine terrace deposits of the upper Pleistocene epoch and by the Tertiary Monterey formation, which have a moderate to high potential for paleontological resources, particularly marine fossils (Wiseman et al., 2025 – Appendix F [Cultural Assessment], p. 64). The Project site is not located near a known historic, cultural, or paleontological resource (City of Goleta, 2006b – Figure 3.5-1). An Extended Phase I (XPI) study was conducted as part of a cultural resources assessment by Environmental Resources Management, Inc. (ERM) for the proposed Project. During XPI testing, ERM observed marine terrace sediment at testing depth (4 feet below ground surface). However, no unique paleontological or geologic features were observed at the Project site (Wiseman et al., 2025 – Appendix F [Cultural Assessment], p. 19). The greatest anticipated depth of any excavation at the site would be no more than 14 feet and no less than 12 feet of embedment for pile depths. All other excavations, such as for the gen-tie line, foundations, or pads, would be at shallower depths, approximately 10 feet or less.

5.7.2. Regulatory Background

Federal

The Clean Water Act. The Clean Water Act establishes the basic structure for regulating discharges of pollutants into the Waters of the U.S. The Act authorized the Public Health Service to prepare comprehensive programs for eliminating or reducing the pollution of interstate waters and tributaries and improving the sanitary condition of surface and underground waters with the goal of improvements to and conservation of waters for public water supplies, propagation of fish and aquatic life, recreational purposes, and agricultural and industrial uses. The proposed Project construction may disturb a surface area greater than one acre; therefore, the applicant would be required to obtain a National Pollution Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction Activity under Clean Water Act regulations. Compliance with the NPDES would require that the applicant prepare and submit a Storm Water Pollution Prevention Plan (SWPPP).

The International Building Code (IBC). The International Building Code (IBC) is published by the International Code Council (ICC). The scope of this code covers major aspects of the design and construction

and structures and buildings, except for three-story one- and two-family dwellings and town homes. The International Building Code has replaced the Uniform Building Code as the basis for the California Building Code and contains provisions for structural engineering design. The 2021 IBC addresses the design and installation of structures and building systems through requirements that emphasize performance. The IBC includes codes governing structural as well as fire- and life-safety provisions covering seismic, wind, accessibility, egress, occupancy, and roofs.

State

The 2022 California Building Code, Title 24, Part 2. The California Building Code, Title 24, Part 2 provides building codes and standards for design and construction of structures in California. The 2022 CBC is based on the 2021 International Building Code with the addition of more extensive structural seismic provisions. Chapter 16 of the CBC contains definitions of seismic sources and the procedure used to calculate seismic forces on structures.

The 2022 California Fire Code, Title 24, Part 9, Chapter 12). The California Fire Code, Title 24, Part 9, Chapter 12 provides codes and standards for design and construction of Energy Systems as it relates to fire safety. Section 1207 specifically applies to electrical Energy Storage Systems (ESS) and provides information on permit, construction, hazard mitigation, and operational requirements. It also includes a requirement that ESS structures shall comply with seismic design requirements of CBC Chapter 16.

The Alquist-Priolo Earthquake Fault Zoning Act of 1972, Public Resources Code (PRC), sections 2621–2630 (formerly the Special Studies Zoning Act). The Alquist-Priolo Earthquake Fault Zoning Act regulates development and construction of buildings intended for human occupancy to avoid the hazard of surface fault rupture. While this Act does not specifically regulate transmission and telecommunication lines; it does help define areas where fault rupture is most likely to occur. This Act groups faults into categories of active, potentially active, and inactive faults. Historic and Holocene age faults are considered active, Late Quaternary and Quaternary age faults are considered potentially active, and pre-Quaternary age faults are considered inactive. These classifications are qualified by the conditions that a fault must be shown to be “sufficiently active” and “well defined” by detailed site-specific geologic explorations in order to determine whether building setbacks should be established.

The Seismic Hazards Mapping Act (the Act) of 1990 (Public Resources Code, Chapter 7.8, Division 2, sections 2690–2699). The Act directs the California Department of Conservation, Division of Mines and Geology [now called California Geological Survey (CGS)] to delineate Seismic Hazard Zones. The purpose of the Act is to reduce the threat to public health and safety and to minimize the loss of life and property by identifying and mitigating seismic hazards. Cities, counties, and State agencies are directed to use seismic hazard zone maps developed by CGS in their land-use planning and permitting processes. The Act requires that site-specific geotechnical investigations be performed prior to permitting most urban development projects within seismic hazard zones.

Public Resources Code Section 5097.5. PRC Section 5097.5 provides for the protection of cultural resources. This PRC section prohibits the removal, destruction, injury, or defacement of archaeological features on any lands under the jurisdiction of State or local authorities.

PRC Section 5097.5 also affirms that no person shall willingly or knowingly excavate, remove, or otherwise destroy a vertebrate paleontological site or paleontological feature without the express permission of the overseeing public land agency. It further states under PRC Section 30244 that any development that would adversely impact paleontological resources shall require reasonable mitigation. These regulations apply to projects located on land owned by or under the jurisdiction of the State or any city, county, district, or other public agency (PRC §5097.5). The importance of paleontological resources is based on their scientific and educational value. The Society of Vertebrate Paleontology identifies vertebrate fossils, their taphonomy (fossilization process) and associated environmental data, and fossiliferous deposits as scientifically

significant nonrenewable paleontological resources (Society of Vertebrate Paleontology, 2010). Botanical and invertebrate fossils and assemblages may also be significant. Absent specific agency guidelines, most professional paleontologists in California adhere to guidelines set forth in “Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources” (Society of Vertebrate Paleontology, 2010). These categories include high, undetermined, low, and no potential.

Local

City of Goleta General Plan. The purpose of the City’s safety policies regarding geology and soils is to reduce the potential loss of both public and private property in areas subject to seismic events, seismically induced hazards, steep slopes, erosion hazards. The following policies in the General Plan relate to the proposed Project (City of Goleta, 2006a):

- **Policy SE 4.3 Geotechnical and Geologic Studies Required.** Where appropriate, the City shall require applications for planning entitlements for new or expanded development to address potential geologic and seismic hazards through the preparation of geotechnical and geologic reports for City review and acceptance (Safety Element, p. 5-18).
- **Policy SE 4.4 Setback from Faults.** New development shall not be located closer than 50 feet to any active or potentially active fault line to reduce potential damage from surface rupture. Nonstructural development may be allowed in such areas, depending on how such nonstructural development would withstand or respond to fault rupture or other seismic damage (Safety Element, p. 5-18).
- **Policy SE 4.5 Adoption of Updated California Building Code Requirements.** The City shall review, amend, and adopt new California Building Code requirements, when necessary, to promote the use of updated construction standards. The City shall consider and may adopt new optional state revisions for Seismic Hazards (Safety Element, p. 5-18).
- **Policy 4.10 Avoidance of Liquefaction Hazard Areas for Critical Facilities.** The City shall discourage the construction of critical facilities in areas of potential liquefaction. In cases where construction of such facilities cannot avoid liquefaction-hazard areas, the City shall require implementation of appropriate mitigation as recommended in site-specific geotechnical and soils studies (Safety Element, p. 5-18).
- **Policy SE 4.11 Geotechnical Report Required.** The City shall require geotechnical and/or geologic reports as part of the application for construction of habitable structures and essential services buildings (as defined by the building code) sited in areas having a medium-to-high potential for liquefaction and seismic settlement. The geotechnical study shall evaluate the potential for liquefaction and/or seismic-related settlement to impact the development, and identify appropriate structural-design parameters to mitigate potential hazards (Safety Element, p. 5-19).
- **Policy SE 5.1 Evaluation of Slope-Related Hazards.** The City shall require geotechnical/geological, soil, and structural engineering studies for all development proposed in areas of known high and moderate landslide potential or on slopes equaling or exceeding 25 percent. The studies shall evaluate the potential for landslides, rockfalls, creep, and other mass movement processes that could impact the development; they shall also identify mitigation to reduce these potential impacts, if needed. The studies shall be included as part of an application for development (Safety Element, p. 5-19).
- **Policy SE 5.2 Evaluation of Soil-Related Hazards.** The City shall require structural evaluation reports with appropriate mitigation measures to be provided for all new subdivisions, and for discretionary projects proposing new nonresidential buildings or substantial additions. Depending on the conclusions of the structural evaluation report, soil and geological reports may also be required. Such studies shall evaluate the potential for soil expansion, compression, and collapse to impact the development; they shall also identify mitigation to reduce these potential impacts, if needed (Safety Element, p. 5-19).

5.7.3. Environmental Impacts and Mitigation Measures

Thresholds of Significance

A significant impact on geology/soils would occur if the proposed project resulted in any of the impacts noted in the above checklist. Impacts are considered potentially significant if the project, and/or implementation of required mitigation measures, could result in increased erosion, landslides, soil creep, mudslides, and/or unstable slopes. Additionally, impacts are considered significant when people or structures would be exposed to major geologic hazards upon implementation of the Project.

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) stipulates that a proposed project would result in a potentially significant impact on geological processes if:

Threshold GEO-1. The project site or any part of the project is located on land having substantial geologic constraints, as determined by the City of Goleta. Areas constrained by geology include parcels located near active or potentially active faults and property underlain by rock types associated with compressible/collapsible soils or susceptible to landslides or severe erosion.

Threshold GEO-2. The project results in potentially hazardous geologic conditions such as the construction of cut slopes exceeding a grade of 1.5 horizontal to 1.0 vertical.

Threshold GEO-3. The project proposes construction of a cut slope over 15-feet in height as measured from the lowest finished grade.

Threshold GEO-4. The project is located on slopes exceeding 20% grade.

Impact Analysis

Threshold GEO-1 is addressed in Checklist Items (a.i), (a.ii), (a.iii), (b), (c), (d), and (e). Thresholds GEO-2, GEO-3, and GEO-4 are addressed in Checklist Items (a.iv) and (c).

(a) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

- i. **Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.**

NO IMPACT. No Alquist-Priolo mapped or other known active faults cross the proposed Project site or are immediately adjacent to it (LGC, 2024 - Appendix G [Geotechnical Report], p. 6). Therefore, there is no potential for the Project to be damaged by fault rupture, and no project activities associated with its construction, operation, or decommissioning would trigger or directly or indirectly cause primary fault rupture. Therefore, no impact would occur.

- ii. **Strong seismic ground shaking?**

LESS THAN SIGNIFICANT. The proposed Project would be located in an area mapped as likely to experience strong to very strong ground shaking in the event of a large earthquake with a PGA of 1.0508 g (acceleration due to gravity) for a 2 percent probability of exceedance in 50 years for the Project site (USGS, 2025b). The area has historically experienced moderate to severe ground shaking due to the numerous earthquakes that have occurred in the Santa Barbara County area (USGS, 2025a; City of Goleta, 2006a, p. 5-3).

Once constructed, there would be no full-time onsite workers at the site. There would be no occupied structures as part of the Project; workers would be onsite periodically for as needed inspections and maintenance during Project operation. The proposed BESS system (including the BESS units and

enclosures and the power conversion systems and their enclosures) may be subject to strong to very strong ground shaking during the Project's lifetime. The underground 66 kV gen-tie line would not be significantly impacted by strong ground shaking because underground cables are typically installed with some slack and are made of materials that can tolerate ground movement without breaking. Moreover, buried lines are shielded from surface-level hazards like falling debris, which can damage above-ground infrastructure during an earthquake. Project decommissioning would not be significantly impacted by strong ground shaking because it involves the removal of the surface-level equipment and infrastructure that is vulnerable to collapse or damage during an earthquake.

While the potential for seismically induced ground shaking in the proposed Project site during Project operation is unavoidable, the BESS and 66 kV gen-tie line would be designed to comply with all applicable local and State seismic design criteria. Design of these structures to all appropriate seismic design criteria reduces the potential for loss, injury, or death of workers or the public to less than significant.

iii. Seismic-related ground failure, including liquefaction?

LESS THAN SIGNIFICANT. The proposed Project site is not within a liquefaction hazard zone identified by Santa Barbara County (Santa Barbara, 2025). Additionally, in the geotechnical evaluation for the proposed Project, LGC found the potential for liquefaction and the potential for lateral spreading to be considered very low (LGC, 2024 - Appendix G [Geotechnical Report], p. 7). While the potential for seismic-related ground failure in the proposed Project site during construction, operation, and decommissioning is low, the BESS system and 66 kV gen-tie line would be designed to appropriate local and State guidelines to reduce the potential for loss, injury, or death of workers or the public to less than significant.

iv. Landslides?

NO IMPACT. The topography of the proposed Project site is relatively flat ground and slopes from north to south from approximately 115 feet above mean sea level to approximately 102 feet above mean sea level (LGC, 2024 - Appendix G [Geotechnical Report], p. 1). According to landslide hazard mapping compiled by the City of Goleta, the proposed Project site is not within a landslide hazard zone (City of Goleta, 2006a – Figure 5-1). Furthermore, LGC's geotechnical evaluation for the proposed Project site did not indicate the presence of landslides on the site or in the immediate vicinity (LGC, 2024 - Appendix G [Geotechnical Report], p. 5). Therefore, landslides and other slope failures are highly unlikely to occur during Project construction, operation, or decommissioning, and there would be no impact related to landslides or slope instability.

(b) Would the project result in substantial soil erosion or the loss of topsoil?

LESS THAN SIGNIFICANT. The Project site is relatively flat with a gentle north-south slope from 115 feet to 102 feet above mean sea level (LGC, 2024 - Appendix G [Geotechnical Report], p. 10). Based on the hydrological analysis, the watershed erosion estimate (which is calculated as a product of the site's sedimentation R Factor, erodibility K Factor, and slope length LS factor) for the site is 8.8 tons per acre, which indicates a "Low" sediment risk (under 15 tons per acre) (ERM, 2025 – Appendix K [Construction SWPPP], p. 87). The proposed Project would therefore have a less than significant impact on drainage patterns or runoff generation and would not create on- or off-site erosion or siltation.

Surface disturbing activities such as trenching, grading, equipment staging, and landscaping would be required for construction of the proposed Project but would be done in compliance with regulations pertaining to sediment and runoff control, including silt fencing on the site perimeter. Sediment controls would be implemented to prevent water or wind disturbance and migration of the earth.

As noted in Section 5.7.1 "Regulatory Background", construction of the proposed Project would disturb a surface area greater than one acre; therefore, the applicant would be required to obtain a National Pollution Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated

with Construction Activity under Clean Water Act regulations. Compliance with the NPDES would require that the applicant prepare and submit a Storm Water Pollution Prevention Plan (SWPPP). Adherence to a SWPPP, as required by the condition of approval, GEO2, below, would ensure that the potential erosion or loss of topsoil is limited and reduced to a less than significant impact during construction and decommissioning of the Project. The operation of the Project would not have a significant impact on soil erosion or the loss of topsoil.

(c) Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

LESS THAN SIGNIFICANT. As discussed above in Item (a)(iii) regarding liquefaction, the proposed Project site is not within a liquefaction hazard zone identified by Santa Barbara County (Santa Barbara, 2025), and LGC found a very low potential for liquefaction and lateral spreading in the geotechnical evaluation for the site (LGC, 2024 - Appendix G [Geotechnical Report], p. 7). The BESS system and 66 kV gen-tie line would be designed to appropriate local and State guidelines to reduce the potential for loss, injury, or death of workers or the public to less than significant.

As discussed above in item (a)(iv) Landslides, there would be no impact from landslides as the proposed Project is located on and traverses flat to gently sloping terrain and would not be subject to landslides. The proposed Project site is not within a landslide hazard zone identified by the City of Goleta (City of Goleta, 2006a – Figure 5-1), and LGC’s research, field observations, and review of regional geologic maps of the area did indicate the presence of landslides on the site or in the immediate vicinity (LGC, 2024 - Appendix G [Geotechnical Report], p. 5). Therefore, landslides and other slope failures are highly unlikely to occur and there would be no impact related to landslides or slope instability.

InSAR land subsidence data for the proposed Project site shows a positive rather than negative displacement value (increased between 0.09 and 0.11 feet) for the time period of June 13, 2015 to January 1, 2025 (DWR, 2025). Therefore, little to no subsidence has occurred in the past 10 years. Furthermore, soils that are not organic are rated “mineral soil,” which are soils that do not subside due to organic matter oxidation (decomposition) (NRCS, 2025). Milpitas-Positas fine sandy loams, 2 to 9 percent slopes are rated as “mineral soil” and have a subsidence rating of 0, meaning they are not at risk of subsiding as a result of the drainage of wet soil (NRCS, 2025). Thus, there would be no impact from subsidence.

In sum, the proposed Project would not be located on geologic units or soils that are unstable or would become unstable as a result of Project construction, operation, or decommissioning due to landslides, slope instability, or land subsidence. While the potential for seismic-related ground failure or liquefaction in the proposed Project site is low, the BESS system and 66 kV gen-tie line would be designed to appropriate local and State guidelines to reduce the potential for loss, injury, or death of workers or the public to less than significant. There would be a less than significant impact overall.

(d) Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

LESS THAN SIGNIFICANT. Mapping by the NRCS indicates that the Project site is underlain by Milpitas-Positas fine sandy loams, 2 to 9 percent slopes, which has low linear extensibility and moderate expansion potential (NRCS, 2025). Expansion Index (EI) testing conducted by LGC as part of the geotechnical site evaluation indicated EI values of 19 and 64, corresponding to “Very Low” and “Medium” expansion potential (LGC, 2024 - Appendix G [Geotechnical Report], p. 9). Expansive soils could impact the integrity and stability of BESS system foundations, damaging structures and potentially injuring workers. Compliance with local and State design requirements would reduce potential impacts from expansive soils.

The condition of approval GEO1 requires that all grading and earthwork recommendations from the Project’s geotechnical engineering report, including any updates, shall be incorporated into the final

Project design. Final grading, foundation, utility, and infrastructure plans shall be reviewed and approved by City staff prior to approval of a grading permit. During construction, all grading activities would be supervised by a registered civil engineer or certified engineering geologist, ensuring compliance. Based on the geotechnical evaluation (see Appendix G [Geotechnical Report]), LGC recommended the following design measures for Project construction, which would be implemented as required in the condition of approval GEO1, below:

- Moisture conditioning of the subgrade for equipment pad slabs will be required due to site expansive soils. Time duration for presoaking from completion of rough grading to trenching of foundations should be accounted for in the construction schedule (typically 1 to 2 weeks). The subgrade moisture condition of the equipment pad soils should be maintained at 120 percent of optimum moisture content to a depth of 18 inches up to the time of concrete placement. Presoaking is not necessary for foundations supported by a deep foundation system.
- A mat foundation can be used for support of the proposed battery storage and equipment pads. Mat foundations can be useful in helping distribute structural loads, to span local irregularities in the supporting capacity of the foundation soils, and to reduce the impact of expansive soils. The mat slab should have a thickened perimeter edge with a minimum embedment of 12-inches below lowest adjacent grade. Mat slabs are to be supported on compacted fill soils properly prepared in accordance with the recommendations provided in this report.
- The inclusion of control joints at a maximum of 15-foot on center for any proposed freestanding walls to reduce the potential for unsightly cracks due to differential settlement or expansive soils. If the soil-moisture content below the wall foundation varies significantly, some wall movement should be expected; however, this movement is unlikely to cause more than cosmetic distress.

With implementation of the condition of approval GEO1 during construction, the potential for expansive soils at the project site to create substantial direct or indirect risks to life or property during operation and decommissioning will be less than significant.

(e) Would the project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

NO IMPACT. The proposed Project would not include any components requiring septic tanks or alternative wastewater systems. Therefore, no impacts would occur as a result of Project construction, operation, or decommissioning.

(f) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

LESS THAN SIGNIFICANT, WITH MITIGATION INCORPORATED. The Project site is underlain by Quaternary marine terrace deposits of the upper Pleistocene epoch and by the Tertiary Monterey formation, which have a moderate to high potential for paleontological resources, particularly marine fossils (Wiseman et al., 2025 – Appendix F [Cultural Assessment], p. 64). The Project site is not located near a known historic, cultural, or paleontological resource (City of Goleta, 2006b – Figure 3.5-1). During Extended Phase I testing conducted as part of the cultural resources assessment for the Project site, ERM observed marine terrace sediment at testing depth (4 feet below ground surface). However, no unique paleontological or geologic features were observed at the Project site (Wiseman et al., 2025 – Appendix F [Cultural Assessment], p. 19).

The proposed Project is anticipated to disturb the ground surface for grading, equipment staging, and landscaping. The greatest anticipated depth of any excavation at the site would be no more than 14 feet and no less than 12 feet of embedment for pile depths. All other excavations, such as for the gen-tie line, foundations, or pads, would be at shallower depths, approximately 10 feet or less. While there is a

moderate to high potential for paleontological resources of the underlying geologic units, no unique paleontological or geologic features were observed during XPI testing. Thus, the likelihood of encountering a unique paleontological resource or geologic feature on the proposed Project site is low. If encountered, any paleontologically or geologically significant resources would be evaluated and protected by a qualified paleontologist. Therefore, the impact to unique paleontological resources or geologic features during Project construction and decommissioning would be less than significant with incorporation of MM GEO-1. There would be no impact to unique paleontological or geologic resources as a result of the Project's operation.

MM GEO-1 Inadvertent Discovery of Unique Paleontological Resources or Geologic Features. If previously unidentified paleontological resources or geologic features are uncovered during construction activities, construction work within 50 feet of the find shall be halted and directed away from the discovery until a qualified paleontologist or geologist assesses the significance of the resource. The paleontologist or geologist, in consultation with the City of Goleta, and any other responsible public agency, shall make the necessary plans for treatment of the find(s) and for the evaluation and mitigation of impacts.

5.7.3.1. Impact Conclusions and Mitigation Measures

The proposed Project would result in potentially significant impacts to geology and soils, and thus, mitigation measure MM GEO-1 is recommended. The proposed Project would result in less than significant Geology and Soils impacts, with implementation of MM GEO-1.

Additionally, the following recommended condition of approval includes requirements to ensure potential project-related impacts are reduced to a less than significant level.

GEO1. Recommended Condition of Approval: Geotechnical Recommendations. All grading and earth-work recommendations from the project's geotechnical engineering report, including any updates, shall be incorporated into the final project design, including the final grading, foundation, utility, and infrastructure plans. All grading activities shall be supervised by a registered civil engineer or certified engineering geologist.

Plan Requirements and Timing: Final grading, foundation, utility, and infrastructure plans shall be reviewed and approved by City staff prior to approval of a grading permit.

Monitoring: The Planning and Environmental Review Director, or designee, shall verify compliance prior to any grading permit approval. Public Works staff shall periodically spot check in the field.

GEO2. Recommended Condition of Approval: Stormwater Pollution Prevention Plan (SWPPP) Development and Implementation. Following Project approval, the applicant will prepare and implement a SWPPP to minimize construction impacts on surface water and groundwater quality. Implementation of the SWPPP will help stabilize graded or disturbed areas and reduce erosion and sedimentation. The plan will designate BMPs that will be adhered to during construction activities. Erosion and sediment control measures, such as straw wattles, covers, and silt fences, may be installed before the onset of winter rains or any anticipated storm events if soils are not stabilized. Suitable stabilization measures will be used to protect exposed areas during construction activities, as necessary. During construction activities measures will be in place to prevent contaminant discharge.

The Project SWPPP will include erosion control and sediment transport BMPs to be used during construction. BMPs, where applicable, will be designed by using specific criteria from recognized BMP design guidance manuals. Erosion-minimizing efforts may include measures such as properly containing stockpiled soils.

Erosion control measures identified will be installed in an area before construction begins during the wet season and before the onset of winter rains or any anticipated storm events. Temporary measures such as silt fences or wattles, intended to minimize sediment transport from temporarily disturbed areas, will remain in place until disturbed areas have stabilized. The plan will be updated during construction as required by the SWRCB.

A worker education program shall be established for all field personnel prior to initiating fieldwork to provide training in the appropriate application and construction of erosion and sediment control measures contained in the SWPPP. This education program will also discuss appropriate hazardous materials management and spill response. Compliance with these requirements will be ensured by the on-site construction contractor.

5.8. Greenhouse Gas Emissions

GREENHOUSE GAS EMISSIONS				
Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
(b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

Significance criteria established by CEQA Guidelines, Appendix G.

5.8.1. Setting

The global climate depends on the presence of naturally occurring greenhouse gases (GHG) to provide what is commonly known as the “greenhouse effect” that allows heat radiated from the Earth’s surface to warm the atmosphere. The greenhouse effect is driven mainly by water vapor, aerosols, carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), and other constituents. Globally, the presence of GHG affects temperatures, precipitation, sea levels, ocean currents, wind patterns, and storm activity.

Human activity directly contributes to emissions of six primary anthropogenic GHGs: CO₂, CH₄, N₂O, hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆). The standard definition of anthropogenic GHG includes these six substances under the 1997 Kyoto Protocol (UNFCCC 1998). The most important and widely occurring anthropogenic GHG is CO₂, primarily from the use of fossil fuels as a source of energy.

Changing temperatures, precipitation, sea levels, ocean currents, wind patterns and storm activity provide indicators and evidence of the effects of climate change. For the period 1950 onward, relatively comprehensive data sets of observations are available. Research by California’s Office of Environmental Health Hazard Assessment (OEHHA) reports certain climate change indicators by categorizing the effects as: changes in California’s climate; impacts to physical systems including oceans, lakes, rivers, and snowpack; and impacts to biological systems including humans, vegetation, and wildlife. The primary observed changes in California’s climate include increased annual average air temperatures, more-frequent extremely hot days and nights, and increased severity of drought. Impacts to physical systems affected by warming temperatures and changing precipitation patterns show decreasing snowmelt runoff, shrinking glaciers, and rising sea levels. Impacts to terrestrial, marine, and freshwater biological systems, with resulting changes in habitat, agriculture, and food supply are occurring in conjunction with the potential to impact human well-being (OEHHA, 2018).

GHG-Emissions Trends. California first formalized a strategy to achieve GHG reductions in 2008, when California produced approximately 484 million metric tons of CO₂ equivalent (MMTCO_{2e}) according to the official Air Resources Board (ARB) inventory (ARB, 2021). In 2022, the annual California statewide GHG emissions were 371.1 million metric tons of CO₂ equivalent (MMTCO_{2e}) (ARB, 2024). Globally, an estimated 33,423 MMTCO_{2e} were added to the atmosphere through the combustion of fossil fuels in 2022, of which the United States accounted for approximately 14.1 percent. From approximately 1750 to 2022, concentrations of CO₂ have increased globally by 49.5 percent (EPA, 2024). In this global context, California emits less than one percent of the global anthropogenic GHG.

5.8.2. Regulatory Background

State

California Global Warming Solutions Act of 2006. The California Global Warming Solutions Act of 2006 (Assembly Bill [AB] 32) required that California's greenhouse gas (GHG) emissions be reduced to 1990 levels by 2020. The reduction is being accomplished through an enforceable statewide cap on global warming emissions beginning in 2012. AB 32 directs the ARB to develop regulations and a mandatory reporting system to track and monitor global warming emissions levels (AB 32, Chapter 488, Statutes of 2006). AB 32 requires ARB to update the Scoping Plan at least every five years. Accordingly, the ARB released a 2022 Scoping Plan Update in November 2022 (ARB, 2022).

In passing AB 32, the California Legislature found that:

Global warming poses a serious threat to the economic well-being, public health, natural resources, and the environment of California. The potential adverse impacts of global warming include the exacerbation of air quality problems, a reduction in the quality and supply of water to the state from the Sierra snowpack, a rise in sea levels resulting in the displacement of thousands of coastal businesses and residences, damage to marine ecosystems and the natural environment, and an increase in the incidences of infectious diseases, asthma, and other human health-related problems.

Other major Executive Orders, legislation, and regulations adopted for the purpose of reducing GHG emissions support the implementation of AB 32 and California's climate goals, and update the target, as described below.

California Governor's Executive Order B-30- 15 and Senate Bill 32. Executive Order B-30- 15 (April 2015) establishes a California greenhouse gas reduction target of 40 percent below 1990 levels by 2030. One purpose of this interim target of this executive order is to ensure California meets its target of reducing greenhouse gas emissions to 80 percent below 1990 levels by 2050. This executive order also specifically addresses the need for climate adaptation and directs state agencies to update the California Climate Adaptation Strategy to identify how climate change will affect California infrastructure and industry and what actions the state can take to reduce the risks posed by climate change. Senate Bill (SB) 32 of 2016 codifies this GHG emissions target to 40 percent below the 1990 level by 2030.

Clean Energy and Pollution Reduction Act of 2015. California's state policy objectives on long-term energy planning were updated with SB 350 legislation that was signed into law on October 7, 2015. The requirements include demonstrating through integrated resource planning how each energy service provider will continue to expand the use of renewable energy supplies in the mix of electricity delivered to end-use customers. With SB 350 California expanded the specific set of objectives to be achieved by 2030, with the following:

- To increase the Renewable Portfolio Standard (RPS) from 33 percent to 50 percent for the procurement of California's electricity from renewable sources; and
- To double the energy efficiency savings in electricity and natural gas end uses by retail customers.

California Governor's Executive Order B-55-18 and Senate Bill 100. Beyond 2030, Executive Order B-55-18 establishes a statewide goal for California to achieve carbon neutrality by 2045. In September 2018, SB 100—which revised and extended California's Renewables Portfolio Standard program—was signed into law. SB 100 accelerated the RPS targets and established the goals of 50 percent renewable energy resources by 2026 and 60 percent renewable energy resources by 2030. These RPS targets are codified according to compliance periods in Public Utilities Code Section 399.30, as follows: 33 percent by December 31, 2020; 44 percent by December 31, 2024; 52 percent by December 31, 2027; and 60 percent

by December 31, 2030. SB 100 also sets a target for California to achieve a GHG-free electricity supply for 100 percent of retail sales of electricity to California end-use customers by December 31, 2045. The 2022 Scoping Plan Update assesses progress towards achieving the updated 2030 targets, while laying out a path to achieve the SB 100 target of carbon neutrality no later than 2045 (ARB, 2022).

Local

Santa Barbara County Air Pollution Control District

The SBCAPCD recommends finding that a proposed stationary source project will not have a significant impact on the climate, if the project will:

- Emit less than the screening significance level of 10,000 MTCO₂e per year, or
- Show compliance with an approved GHG emission reduction plan or GHG mitigation program which avoids or substantially reduces GHG emissions [sources subject to the AB 32 Cap-and-Trade requirements pursuant to Title 17, Article 5 (California Cap on Greenhouse Gas Emissions and Market-based Compliance Mechanisms) would meet the criteria], or
- Show consistency with the AB 32 Scoping Plan GHG emission reduction goals by reducing project emissions 15.3 percent below business as usual.

If a project's emissions exceed any of the above thresholds, the SBCAPCD recommends applying mitigation measures (SBCAPCD, 2015).

City of Goleta

In July of 2014, the City of Goleta adopted the Climate Action Plan to identify measures to meet GHG reduction targets. In 2019 it adopted the Strategic Energy Plan to meet its 100 percent renewable electricity goals which were unanimously adopted in December 2017 by the City of Goleta City Council. The Strategic Energy Plan is a partnership between the City of Goleta, City of Carpinteria, and County of Santa Barbara to meet the 100 percent renewable electricity goal and improve resiliency of the local electricity system. The Strategic Energy Plan includes recommendations for increased battery storage to achieve electricity bill reductions and provide backup capacity for shorter outages, increasing electricity resiliency.

5.8.3. Environmental Impacts and Mitigation Measures

Thresholds of Significance

The City of Goleta adopted local CEQA guidelines in August 2008. The Environmental Review Guidelines set procedures for complying with CEQA, to protect both local and regional resources while reflecting local values.

The City's Environmental Review Guideline's Air Quality Thresholds adopt the SBCAPCD Environmental Review Guidelines, which are outlined above. The City also adopted Resolution No. 20-44 Adopting Guidelines for the Implementation of Vehicle Miles Traveled which sets thresholds for VMT increases which would be considered potentially significant impacts. While these thresholds were set partially with GHG reduction goals in mind, they are addressed in the transportation section. No additional GHG thresholds are set by the City, and therefore, the CEQA Guidelines Appendix G checklist is used to determine significance.

Impact Analysis

(a) Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

DURING CONSTRUCTION - LESS THAN SIGNIFICANT. Construction-phase activities include mobilizing vehicles and equipment for construction, crews, and materials. The site work would include site preparation and minor vegetation clearing, rough and fine grading, installing the BESS foundations and BESS enclosures, laying the underground electrical collection and communication lines, assembling accessory electrical components including transformers, and installing high-voltage equipment such as the generation-tie line. These activities during construction would cause GHG emissions due to fuels used by the construction vehicles and equipment. Diesel and gasoline-powered construction equipment would include trucks for materials and crews, and the following types of equipment: cranes, dozers, graders, excavators, loaders, and tractors. Equipment and motor vehicles would directly emit CO₂, CH₄, and N₂O due to fuel use and combustion, and motor vehicle fuel combustion emissions in terms of CO₂e are approximately 95 percent CO₂, and CH₄ and N₂O emissions occur at rates of less than 1 percent of the mass of combustion CO₂ emissions. Emissions associated with commissioning passenger vehicle trips would be much lower than calculated construction emissions.

The resulting one-time aggregate quantity of GHG emitted during the eight-month period of construction would be approximately 119 MTCO₂e (Appendix D, Air Quality and Greenhouse Gas Report), based on use of the California Emissions Estimator Model (CalEEMod; v.2022). These project-level emissions would cease at the conclusion of construction and would be well below the threshold level of 10,000 MTCO₂e per year (SBCAPCD, 2015). Therefore, the impacts would be less than significant.

Decommissioning activities would be similar to construction activities, but would be done in reverse. Additionally, decommissioning is estimated to occur in the year 2050, and it is assumed that vehicles and equipment used in the decommissioning process would be more efficient and would emit less GHGs than present-day vehicles and equipment. Therefore, impacts from decommissioning would be similar, or less than impacts from construction activities, and would be less than significant.

DURING OPERATION - LESS THAN SIGNIFICANT. The proposed operation of the BESS would not directly cause or create GHG emissions while charging and discharging. Discharging stored energy enables displacement of dispatchable power plants that are needed during peak demand periods. The energy that the battery system would be storing is drawn from the electricity supply during times of surplus generation. It is likely that the batteries would be charged during excess solar and other renewable energy generation, when energy is the cheapest, and would be discharged during periods when energy is scarcer, more expensive, and when there would be little to no renewable energy generation. By storing energy at times of excess renewable generation and discharging when peaking resources, like the Ellwood Generating Station (EGS) natural gas-fired power plant would otherwise be dispatched, the battery system would provide a combustion-free source of stored energy during times when natural gas-fired power plants would cause higher GHG emissions. The release of stored energy by the BESS would have the indirect effect of avoiding GHG emissions that would otherwise be caused by natural gas fired peaking power plants.

Upon completion of construction, operation of the Project would cause indirect GHG emissions from vehicles driving to and from the site for maintenance and from other minor maintenance and operation activities such as from the electricity needed to power the lighting on site. To conservatively estimate these emissions, default electricity use values for general heavy industry were used, as well as vehicle trips for site inspection and maintenance. Operation phase GHG emissions thus are overestimated, as lighting for the site would use far less electricity than typical general heavy industry sites. During operation, the conservative estimated quantity of GHG emitted is approximately 182 MTCO₂e per year (Appendix D). These operational emissions would not exceed the SBCAPCD's 10,000 MTCO₂e per year

threshold. Because the Project would cause direct emissions at levels less than the applicable threshold and provide overall beneficial effects of displacing GHG from natural gas-fired power plants used for energy generation, this impact would be less than significant.

(b) Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

LESS THAN SIGNIFICANT. California's regulatory setting for GHG emissions ensures that most of the existing and foreseeable GHG sources in the electric power sector are subject to one or more programs aimed at reducing GHG. The 2022 Scoping Plan Update (ARB, 2022) provides an outline of actions to reduce California's GHG emissions. The scoping plan requires ARB and other state agencies to adopt regulations and other initiatives to reduce GHG emissions.

The proposed Project would generate limited quantities of direct GHG emissions from construction, decommissioning, and operation and maintenance activities. By storing non-dispatchable renewable energy, the overall mix of generating resources available to serve end-use customers would not change as a result of the proposed Project. The proposed Project would improve the infrastructure used in delivery of renewable energy. The ability to discharge stored energy would support reliability and flexibility in delivery of electricity in compliance with California's RPS requirements. As described above, the battery system would likely be charged when there would be excess renewable energy generation and would be discharged to the grid when the energy supply is reliant on fossil fuel generation, thereby displacing the need to dispatch natural gas resources, such as the EGS natural gas peaker plant. Increasing the use of renewable generation in conjunction with energy storage is important to the overall objective of decarbonizing the electricity sector (ARB, 2022b). Moreover, the proposed project would not conflict with local, SBCAPCD, State, or federal regulations pertaining to GHG emissions.

The proposed Project would generate limited quantities of direct GHG emissions from the construction, decommissioning, and O&M activities. The mix of power serving the end-use customers would not change as a result of the proposed Project. The proposed Project would improve the infrastructure used in delivery of SCE's energy supply and would not affect SCE's ability to supply renewable energy. By installing battery energy storage, the Project would be likely to improve SCE's reliability and flexibility in delivery of electricity in compliance with California's RPS requirements. Increasing the use of renewable generation in conjunction with energy storage is important to the overall objective of decarbonizing the electricity sector (ARB, 2022).

California's Cap-and-Trade regulation is the major climate program covering proposed Project-related GHG emissions. Construction, decommissioning, and O&M activities would cause GHG emissions due to fuels used by the vehicles and equipment. The end-users of motor vehicle fuels like gasoline and diesel may include construction contractors that are not otherwise designated as covered entities in the Cap-and-Trade program, and these do not directly bear the Cap-and-Trade compliance obligation. However, all fuel suppliers, including refiners and pipeline companies, must cover the end-user's GHG emissions. Because the Project-related GHG emissions, including construction and decommissioning-phase emissions and the operational-phase mobile source emissions, would be "covered" by the fuel suppliers subject to Cap-and-Trade requirements, these emissions would not conflict California's progress towards achieving GHG reductions. Impacts would be less than significant.

5.8.3.1. Impact Conclusions and Mitigation Measures

The proposed Project would not result in significant greenhouse gas impacts, and thus, no mitigation measures are recommended.

5.9. Hazards and Hazardous Materials

HAZARDS AND HAZARDOUS MATERIALS				
Would the project:	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?	☐	☒	☐	☐
(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?	☐	☒	☐	☐
(c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
(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?	☐	☒	☐	☐
(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?	☐	☐	☒	☐
(f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☒	☐	☐
(g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☒	☐

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 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 | ■ Computer interference | ■ Ignition of flammable materials |
| ■ Radio and television interference | ■ Disturbance of cardiac pacemakers | ■ 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.

5.10. Hydrology and Water Quality

HYDROLOGY AND WATER QUALITY				
Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☒	☐	☐
(b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
(c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) result in substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	☐	☐	☒	☐
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
iv) impede or redirect flood flows?	☐	☐	☐	☒
(d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
(e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

Significance criteria established by CEQA Guidelines, Appendix G.

5.10.1. Setting

5.10.1.1. Surface Waters and Drainage

The City of Goleta is located in the South Coast watershed, in the coastal plain south of the Santa Ynez Mountains in southern Santa Barbara County. The South Coast Watershed drainage area is approximately 416 square miles; the drainages are characterized by high intensity, short duration runoff events due to the relatively short distance from the top of the Santa Ynez Mountains to the Pacific Ocean (GWD, 2021, p. 4-3). Due to the Mediterranean climate of Santa Barbara County and the variability of rainfall, stream flow throughout the County is highly variable and directly impacted from rainfall with little snowmelt or base, with many ephemeral streams that are dry during summer months (GWD, 2021, p. 4-2).

Surface water drainage in the City of Goleta includes twelve creek reaches, six of which discharge into the Goleta Slough (Maria Ygnacio, San Jose, Las Vegas, San Pedro, Los Carneros, and Glen Annie Creeks), two that discharge into the Devereux Slough (Devereux and El Encanto Creeks), and Tecolote, Bell Canyon, Winchester and Ellwood Canyons Creeks. The proposed Project is located approximately 0.25 miles east of Devereux Creek and 0.25 miles west of the Devereux Creek east branch tributary. The creek and tributary drain to the Devereux Slough within the Dos Pueblos Canyon-Frontal Santa Barbara Channel watershed.

Carneros Creek, Glen Annie Creek, Bell Canyon Creek, and Goleta Slough are listed as impaired water bodies by the State Water Resource Control Board under section 303 (d) of the Clean Water Act for either ammonia, nitrates, pathogens, and priority organics (City of Goleta, 2010, p. 8).

Within the City, these regionally important streams have been channelized and modified to reduce flood hazards. The City's storm water drainage system collects and channels surface water into catch basins, storm drains, sewers, and streams, which then flow into the Pacific Ocean (City of Goleta, 2010, p. 56).

5.10.1.2. Groundwater Resources

The Goleta Coastal Plain is underlain by the Goleta Groundwater Basin (14.4 square miles), which is divided into three subbasins: North, Central, and West. The Central subbasin has the most usable groundwater in storage, and the Goleta Water District (GWD) does not pump from the West subbasin (GWD, 2021, p. 5-3). The proposed Project is within the West subbasin.

Water-bearing deposits of the Central subbasin consist of young alluvium of Quaternary and Holocene age, terrace deposits, older alluvium, and the Santa Barbara Formation of Pleistocene age. The Santa Barbara Formation is the primary water-bearing unit and is composed of sand, silt, and clay. GWD has increased groundwater production to offset the loss of surface and imported water since 2012. However, groundwater modeling and monitoring indicate that the basin is not approaching historic lows (GWD, 2021, p. 5-3). GWD currently has nine permitted groundwater production wells located in the Central subbasin, and total well extraction and treatment capacity is approximately 596 acre-feet per month (GWD, 2024, p. 18). The depth to the groundwater table in a nearby monitoring well at the north of the proposed Project site is estimated at 63.3 feet (ERM, 2025 – Appendix K [Construction SWPPP], p. 15).

Water quality data for 2016 to 2021 show that none of the groundwater basin wells sampled had chlorine concentrations above the secondary maximum contaminant level or nitrate concentrations above the primary maximum level. However, sulfate concentrations and total dissolved solids (TDS) exceeded the secondary maximum contaminant level in several sampled wells. Elevated sulfate levels may cause a bitter or astringent taste in the water and can have laxative effects; high levels of TDS produce "hard water," which can leave deposits and films on plumbing fixtures but are not considered a health hazard (GWD, 2023, p. 41).

Iron and manganese in groundwater have historically been elevated in the basin, with most wells in all subbasins having recorded maximum concentrations above the secondary drinking water standards (GWD, 2023, p. 34). GWD treats groundwater for iron and manganese with oxidation via chlorination filtration. Chlorination also provides a disinfectant residual that is required by federal and state regulations and helps maintain a safe drinking water supply throughout the distribution system. Treatment has proven sufficient to meet federal and state primary drinking water regulations (GWD, 2021, p. 7-2).

Historically, there have been several reported spills and leaks of contaminants at the ground surface overlying the Basin. The spilled or leaked contaminants range from gasoline (the most common) to volatile organic compounds. Most active well sites in the Central subbasin are located near a source of potential groundwater contamination; however, the extent of the contamination is generally confined to the shallow water-bearing zones above the primary producing zones in part because of clay layers that impede downward migration of contaminants into the deeper producing zones (GWD, 2023, p. 52).

5.10.1.3. Flood Hazard Areas

Runoff from high intensity, short duration storm events can cause: inundation of over bank areas; debris including sediment, rock, downed trees in the water that can plug culverts and bridges; erosion and sloughing of banks; and loss of channel capacity due to sedimentation. Additionally, portions of the County are subject to flooding due to coastal storm surge events, flash flooding, urban flooding, river channel overflow, and downstream flooding (GWD, 2021, p. 5-24).

On Federal Emergency Management (FEMA) flood maps (FEMA, 2018), the Project site does not fall in an identified flood zone. The proposed Project is located at approximately 0.25 miles east of Devereux Creek

and 0.25 miles west of the Devereux Creek east branch tributary. These creeks are mapped as Special Hazard Flood Zone AE, which are high-risk areas with a 1 percent annual chance of flooding. According to the City's General Plan, Figure 5-2, the proposed Project is not in a tsunami inundation area (City of Goleta, 2006).

5.10.1.4. Water Supply

The Goleta Water District (GWD) provides water to the City of Goleta, the University of California Santa Barbara, the Santa Barbara Airport, and an unincorporated portion of Santa Barbara County (GWD, 2021, p. 2-1). GWD's current water supplies include local surface water from the Cachuma Project, imported water from the State Water Project, local groundwater from the Goleta Groundwater Basin, and non-potable recycled water produced by the Goleta Sanitary District at the Goleta Wastewater Treatment Plant (GWD, 2021, p. ES-3).

5.10.2. Regulatory Background

Federal

The Clean Water Act (CWA; 33 U.S.C. Section 1251 et seq.), formerly the Federal Water Pollution Control Act of 1972, was enacted with the intent of restoring and maintaining the chemical, physical, and biological integrity of the waters of the United States. The CWA requires states to set standards to protect, maintain, and restore water quality through the regulation of point source and certain non-point source discharges to surface water. Those discharges are regulated by the National Pollutant Discharge Elimination System (NPDES) permit process (CWA Section 402). NPDES permitting authority is delegated to, and administered by, California's nine Regional Water Quality Control Boards (RWQCB). In addition, the State Water Resources Control Board (SWRCB) regulates the NPDES stormwater program. The proposed Project is under the jurisdiction of the Central Coast Regional Water Quality Control Board and the SWRCB.

Projects that disturb one or more acres are required to obtain NPDES coverage under the California General Permit for Discharges of Storm Water Associated with Construction Activity. The Construction General Permit requires the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP describes Best Management Practices (BMPs) the discharger would use to protect stormwater runoff. The SWPPP must contain a visual monitoring program and a chemical monitoring program for "non-visible" pollutants to be implemented if there is a failure of BMPs.

State

Porter-Cologne Water Quality Control Act. The Porter Cologne Water Quality Control Act of 1967, Water Code Section 13000 et seq., requires the SWRCB and the nine RWQCBs to adopt water quality criteria to protect State waters. These criteria include the identification of beneficial uses, narrative and numerical water quality standards, and implementation procedures. The criteria for the Project site are contained in the Water Quality Control Plan (also referred to as a Basin Plan) for the Central Coast RWQCB. Constraints in the water quality control plans relative to the proposed Project relate primarily to the avoidance of altering the sediment discharge rate of surface waters, and the avoidance of introducing toxic pollutants to the water resource. A primary focus of water quality control plans is to protect designated beneficial uses of waters. In addition, anyone proposing to discharge waste that could affect the quality of the waters of the state must make a report of the waste discharge to the Regional Water Board or State Water Board as appropriate, in compliance with Porter-Cologne.

California Water Code Section 13260. California Water Code Section 13260 requires that any person discharging waste, or proposing to discharge waste, within any region that could affect the quality of the waters of the State, other than into a community sewer system, must submit a report of waste discharge

to the applicable RWQCB. Any actions related to the proposed Project that would be applicable to Section 13260 would be reported to the Central Coast RWQCB, as applicable.

Local

City of Goleta General Plan. The objectives of the City's General Plan conservation policies in regard to hydrology and water quality are to protect wetlands; manage groundwater and surface water resources to promote water quality, support biodiversity, protect marine aquatic habitats, and support natural ecosystem processes and functions; and to conserve water and manage water use efficiently. The objectives of the City's General Plan public safety policies in regard to hydrology and water quality are to ensure that new development is sized, sited, and designed to avoid or minimize exposure to known physical or other hazards, and ensure that new critical facilities are located and designed to continue functioning after natural disasters. The following policies in the General Plan relate to the proposed Project (City of Goleta, 2006):

- **Policy CE 1.9(d) Standards Applicable to Development Projects.** For new developments within or adjacent to environmentally sensitive habitat areas (ESHAs), all new development shall be sited and designed so as to minimize grading, alteration of natural landforms and physical features, and vegetation clearance in order to reduce or avoid soil erosion, creek siltation, increased runoff, and reduced infiltration of stormwater and to prevent net increases in baseline flows for any receiving water body. (Conservation Element, p. 4-11):
- **Policy CE 10.1 New Development and Water Quality.** New development shall not result in the degradation of the water quality of groundwater basins or surface waters; surface waters include the ocean, lagoons, creeks, ponds, and wetlands. Urban runoff pollutants shall not be discharged or deposited such that they adversely affect these resources (Conservation Element, p. 4-27).
- **Policy CE 10.2 Siting and Design of New Development.** New development shall be sited and designed to protect water quality and minimize impacts to coastal waters by incorporating measures designed to ensure the following (Conservation Element, p. 4-27):
 - a. Protection of areas that provide important water quality benefits, areas necessary to maintain riparian and aquatic biota, and areas susceptible to erosion and sediment loss.
 - b. Limiting increases in areas covered by impervious surfaces.
 - c. Limiting the area where land disturbances occur, such as clearing of vegetation, cut-and-fill, and grading, to reduce erosion and sediment loss.
 - d. Limiting disturbance of natural drainage features and vegetation.
- **Policy CE 10.3 Incorporation of Best Management Practices for Stormwater Management.** New development shall be designed to minimize impacts to water quality from increased runoff volumes and discharges of pollutants from nonpoint sources to the maximum extent feasible, consistent with the City's Storm Water Management Plan or a subsequent Storm Water Management Plan approved by the City and the Central Coast Regional Water Quality Control Board. Post construction structural BMPs shall be designed to treat, infiltrate, or filter stormwater runoff in accordance with applicable standards as required by law. (Conservation Element, p. 4-27).
- **Policy CE 10.7 Drainage and Stormwater Management Plans.** New development shall protect the absorption, purifying, and retentive functions of natural systems that exist on the site. Drainage Plans shall be designed to complement and use existing drainage patterns and systems, where feasible, conveying drainage from the site in a nonerosive manner. Disturbed or degraded natural drainage systems shall be restored where feasible, except where there are geologic or public safety concerns. Proposals for new development shall include a Construction-Phase Erosion Control and Stormwater

Management Plan and a Post-Development-Phase Drainage and Stormwater Management Plan that specify the BMPs that will be implemented (Conservation Element, p. 4-28).

- **Policy SE 6.4 Avoidance of Flood Hazard Areas.** The City shall discourage any new intensive development in any flood hazard area. Similarly, the City shall require appropriate flood mitigation for intensification of existing development in any flood-prone area. The City shall not approve development within areas designated as the 100-year floodplain that would obstruct flood flow (such as construction in the designated floodway), displace floodwaters onto other property, or be subject to flood damage. The City shall not allow development that will create or worsen drainage problems (Safety Element, p. 5-21).
- **Policy SE 6.5 Siting of Critical Facilities.** The City shall discourage the construction of critical facilities within the 100-year floodplain. In cases where construction of such facilities cannot avoid flood hazard areas, the City shall require implementation of appropriate mitigation as recommended in site-specific hydrology/hydraulic and/or engineering studies (Safety Element, p. 5-21).

5.10.3. Environmental Impacts and Mitigation Measures

Thresholds of Significance

A significant impact on Hydrology & Water Quality would be expected to occur if the proposed project resulted in any of the impacts noted in the above checklist. In addition, 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) assume that a significant impact on hydrology and water resources would occur if a project would:

Threshold HYD-1: Result in a substantial alteration of existing drainage patterns.

Threshold HYD-2: Alter the course of a stream or river.

Threshold HYD-3: Increase the rate of surface runoff to the extent that flooding, including increased erosion or sedimentation, occurs.

Threshold HYD-4: Create or contribute to runoff volumes exceed existing or planned stormwater runoff facilities, or substantially degrade water quality.

Impact Analysis

Thresholds HYD-1, HYD-2, HYD-3, and HYD-4 are addressed in Checklist Item (c). Additionally, Threshold HYD-3 is addressed in Checklist Item (a) and Threshold HYD-4 is addressed in Checklist Items (a) and (e).

(a) Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED. Disturbance of soil during construction could result in soil erosion and lowered water quality through increased turbidity and sediment transport into the storm drain system. The receiving waters for the Project include an isolated seasonal wetland at the south of the site, Devereux Creek east branch tributary at the east of the project site and Devereaux Creek at the west and south of the project site. None of the receiving waters are listed on the 303(d) list as impaired for Sedimentation/Siltation or have sediment-related Total Maximum Daily Load (TMDL).

Based on the hydrological analysis performed by ERM in the site-specific Drainage Analysis (see Appendix IX), a retention basin has been designed to capture excess stormwater runoff during long-term operations. An approximately 2,610 square foot bioretention basin is proposed for stormwater retention on the southwest edge (downslope portion) of the BESS facility. Basin design would meet applicable City design standards and the specific design parameters including the location, depth, width, and materials, as

determined by the Project-specific Drainage Analysis (see Appendix I) and Stormwater Control Plan (see Appendix J). Stormwater would be further controlled onsite through the incorporation of self-retaining permeable areas, such as permeable gravel groundcover surrounding each battery storage unit and a permeable gravel base access road. Stormwater would be collected and infiltrated into the ground via the 2,610 square foot bioretention basin at the southwest edge of the Project site, or via an infiltration underdrain at the southeast portion of the site (at the Viajero Drive entrance) (ERM, 2024 - Appendix J [Stormwater Control Plan], p. 4).

During construction and decommissioning, there is potential for violations of water quality standards or waste discharge requirements to occur from accidental leaks, spills, or releases of hazardous or potentially hazardous materials. There is also a potential for violations if existing contamination is encountered during construction. The 2022 Construction General Permit (CGP) requires that best management practices (BMPs) be implemented. The following BMPs would be implemented: bioretention basin, permeable pavement with underdrain, stabilized construction entrance, and silt fences (ERM, 2025 - Appendix K [Construction SWPPP], p. 17). Additionally, proper measures would be taken so that trench spoils or any other soils disturbed during construction activities that are contaminated are not discharged with stormwater or non-stormwater discharges into storm drains or water bodies (ERM, 2025 - Appendix K [Construction SWPPP], p. 20).

The proposed Project parcel is 2.1 acres and would require minor grading on 1.9 acres. Over 1 acre of disturbance would occur during the construction of the BESS and the 200-foot-long gen-tie line, triggering the need for a SWPPP. As discussed in Section 5.7.2(b) Geology and Soils, implementation of the construction SWPPP, consistent with condition of approval GEO2, would ensure that erosion control BMPs would be in place to reduce potential water quality impacts to a less than significant level. Furthermore, complying with applicable water quality standards, including obtaining and adhering to any required water quality permits, would offer sufficient protection to avoid significant adverse impacts to water quality from erosion and sedimentation. Applicable water quality standards and regulations are described above, in Section 5.10.1.

In the event of an accidental spill, adherence to regulatory standards and regulations, as well as implementation of mitigation measure MM HM-1 (Hazardous Substance Control and Emergency Response) (see Section 5.9), would collectively ensure that a suite of BMPs would be applied to minimize the potential for an accidental release of hazardous materials to occur, to quickly and effectively address any such leak, and to quickly and effectively respond to any existing contamination produced or encountered during construction. The intent of regulatory standards is to prevent degradation of water quality to the point where beneficial uses would be impaired. Therefore, potential impacts to water quality standards or waste discharge requirements or other substantial degradation of surface or groundwater quality during construction would be less than significant with implementation of condition of approval GEO2, mitigation measure HM-1 and compliance with regulatory standards. Therefore, no violations would be expected from construction and operation of the proposed Project.

MM HM-1 Hazardous Substance Control and Emergency Response (see full text in Section 5.9, Hazards and Hazardous Materials)

(b) Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

LESS THAN SIGNIFICANT. Groundwater supplies could be adversely affected through direct consumption of groundwater resources or indirect depletion of groundwater supplies such as through conducting dewatering activities where the water is not returned to the subsurface. In the case of the proposed Project there would be minimal demand for water. Water would be provided by the Goleta Water District and would be delivered to the site via truck. A water truck would be used on-site to support dust

suppression during ground disturbing work and to supply water for construction and decommissioning activities. This would not result in a significant demand for water resources from the City of Goleta, where the City's water supply comes from Lake Cachuma (46 percent), SWP (27 percent), groundwater (13 percent), other surface water (9 percent) and recycled water (5 percent) (GWD, 2024 – Figure 2-2). The existing supply is adequate for use during the 8-month duration of construction activities.

The depth to the groundwater table in a nearby monitoring well at the north of the proposed Project site is estimated at 63.3 feet (ERM, 2025 - Appendix K [Construction SWPPP], p. 15). Given the depth to the groundwater table, any water encountered during Project excavation would be shallow and local and dewatering would be for a limited time. The small amount of dewatering would therefore not result in a substantial decrease of the groundwater supply or interfere substantially with groundwater recharge or sustainable groundwater management. Placement of the BESS components and access improvements would result in a minor increase of impervious surfaces within the Project site parcel. The remaining area within the Project site parcel would continue to allow onsite infiltration of rainwater. The Project would have minimal effect on groundwater recharge. Overall, any impacts to groundwater would be less than significant.

(c) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i. result in a substantial erosion or siltation on- or off-site;

LESS THAN SIGNIFICANT. The proposed Project has no potential to alter the course of a stream or river, nor to substantially alter the existing drainage pattern of the site or area. The total area of ground disturbance for the 2.1-acre site is 1.9 acres, including 0.4 acre of new impervious surface. The remaining approximately 1.7 acres would remain pervious, including approximately 0.3 acre of perimeter road, approximately 0.7 acre within the perimeter road (i.e., the areas between the individual BESS units), and approximately 0.7 acre of buffer setback between the BESS perimeter road and the parcel boundaries. Placement of the BESS components and access improvements would result in a minor increase of impervious surfaces within the Project site parcel. The remaining area within the Project site parcel would continue to allow onsite infiltration of rainwater.

As stated in (a), runoff from the site at the existing condition flows toward the south and drains to the seasonal wetland at the south of the property. A site-specific retention basin has been designed to capture excess stormwater runoff during long-term operations. An approximately 2,610 square foot bioretention basin is proposed for stormwater retention on the southwest edge (downslope portion) of the BESS facility. Stormwater would be collected and infiltrated into the ground via a 2,610 square foot bioretention basin at the southwest edge of the site, or via an infiltration underdrain at the southeast portion of the site (ERM, 2025 - Appendix J [Stormwater Control Plan], p. 4).

Based on the hydrological analysis, the watershed erosion estimate (which is calculated as a product of the site's sedimentation R Factor, erodibility K Factor, and slope length LS factor) for the site is 8.8 tons per acre, which indicates a "Low" sediment risk (under 15 tons per acre) (ERM, 2025 - Appendix K [Construction SWPPP], "Sediment Risk Factor Worksheet"). The proposed Project would therefore have a less than significant impact on drainage patterns or runoff generation and would not create on- or off-site erosion or siltation during construction, operations, or decommissioning.

ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?

LESS THAN SIGNIFICANT. As described under Item (c)(i) above, placement of the BESS components and access improvements would result in a minor increase (0.4 acre) of impervious surfaces within the Project site, while the remaining area would continue to allow onsite infiltration of rainwater. An approximately 2,610

square foot bioretention basin for stormwater retention is proposed on the southwest edge of the project site, adjacent to the isolated seasonal wetland. Stormwater would be collected and infiltrated into the ground via a 2,610 square foot bioretention basin at the southwest edge of the site, or via an infiltration underdrain at the southeast portion of the site (ERM, 2025 - Appendix J[Stormwater Control Plan], p. 4). The Drainage Analysis and Stormwater Control Plan prepared for the Project site found that the proposed development will result in stormwater peak flow discharging from the Project site at less than pre-project levels during 2-, 5-, 10-, 25-, 50-, and 100-year storm events (ERM, 2024 - Appendix I [Drainage Analysis], p. 4; ERM, 2024 – Appendix J [Stormwater Control Plan], p. 4). Thus, the site would drain similar to the existing condition, and result in less peak stormwater flow discharge, which would be a less than significant impact on drainage patterns or runoff generation. Impacts on flooding during construction, operation, or decommissioning would therefore be less than significant.

iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

LESS THAN SIGNIFICANT. As discussed above, the Project would not substantially increase the rate or amount of runoff. Existing or planned stormwater drainage systems would therefore not be adversely affected. Except as described under Item (a) above, the Project has no features that would generate substantial polluted runoff during construction, operation, or decommissioning. This impact would be less than significant.

iv. impede or redirect flood flows?

NO IMPACT. The proposed Project is not located in a FEMA-designated flood zone and would not pose a substantial obstruction to flood flows such that flood flows would be impeded or redirected in any substantial way. Therefore, no impacts would occur as a result of Project construction, operation, or decommissioning.

(d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

NO IMPACT. The proposed Project site is not in a tsunami inundation zone (City of Goleta, 2006 – Figure 5-2) and is not in a flood zone identified by FEMA (FEMA, 2018). Therefore, no impacts would occur as a result of Project construction, operation, or decommissioning.

(e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

LESS THAN SIGNIFICANT. As described in Item (a) above, the Project effect on water quality would be less than significant with mitigation. The Devereux Creek and its east branch tributary are east and west of the proposed Project site and are not listed as impaired water bodies. There are no features of the Project that would otherwise generate water quality impairments, nor are there any components of the Project construction, operation, or decommissioning that could otherwise conflict with the implementation of a water quality control plan. The Project would have minimal water use, mainly during construction, which would be obtained from local water purveyors. There are no features of the Project that would otherwise have any effect on groundwater management. Therefore, this impact is less than significant.

5.10.3.1. Impact Conclusions and Mitigation Measures

The proposed Project would result in potentially significant impacts to hydrology and water quality. However, with implementation of MM HM-1 (see full text in Section 5.9, Hazards and Hazardous Materials) and the condition of approval GEO2, below, impacts would be reduced to a less than significant level.

GEO2. Recommended Condition of Approval: Stormwater Pollution Prevention Plan (SWPPP) Development and Implementation. Following Project approval, the applicant will prepare and implement a

SWPPP to minimize construction impacts on surface water and groundwater quality. Implementation of the SWPPP will help stabilize graded or disturbed areas and reduce erosion and sedimentation. The plan will designate BMPs that will be adhered to during construction activities. Erosion and sediment control measures, such as straw wattles, covers, and silt fences, may be installed before the onset of winter rains or any anticipated storm events if soils are not stabilized. Suitable stabilization measures will be used to protect exposed areas during construction activities, as necessary. During construction activities measures will be in place to prevent contaminant discharge.

The Project SWPPP will include erosion control and sediment transport BMPs to be used during construction. BMPs, where applicable, will be designed by using specific criteria from recognized BMP design guidance manuals. Erosion-minimizing efforts may include measures such as properly containing stockpiled soils.

Erosion control measures identified will be installed in an area before construction begins during the wet season and before the onset of winter rains or any anticipated storm events. Temporary measures such as silt fences or wattles, intended to minimize sediment transport from temporarily disturbed areas, will remain in place until disturbed areas have stabilized. The plan will be updated during construction as required by the SWRCB.

A worker education program shall be established for all field personnel prior to initiating fieldwork to provide training in the appropriate application and construction of erosion and sediment control measures contained in the SWPPP. This education program will also discuss appropriate hazardous materials management and spill response. Compliance with these requirements will be ensured by the on-site construction contractor.

5.11. Land Use and Planning

LAND USE PLANNING

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a) Physically divide an established community?	☐	☐	☒	☐
(b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒

Significance criteria established by CEQA Guidelines, Appendix G.

5.11.1. Setting

The proposed Project would be located in a developed area in the central west part of the City of Goleta. The Project site and adjacent parcels to the east, south, and southeast are zone General Commercial (CG), while the adjacent Ellwood Generating Station parcel to the west and the elementary school farther east are zoned Public or Quasi Public. The Hideaway residential neighborhood, further west, is zoned Planned Residential (City of Goleta 2025). The land use in the area is a mix of General Commercial (including the Project site), Planned, Community, Single-Family Residential, and Recreation, Public/Quasi Public. (City of Goleta, 2023).

The CG classification is intended to provide appropriate sites to accommodate a diverse set of commercial uses, such as wholesale trade and service commercial, that do not need highly visible locations or that may involve activities that reduce compatibility with other uses. The sites are in locations that may have limited suitability for other more retail-oriented uses. General commercial uses may serve as a buffer between industrial activities or major transportation corridors and residential areas (City of Goleta, 2006).

The Applicant is requesting a General Plan Amendment to reclassify the Project site as Office and Institutional (I-OI) and to rezone the parcel from CG to Office and Institutional (I-OI).

The I-OI classification intended to provide areas for existing and future office-based uses which includes moderate-density business and professional offices, medical and medical-related uses, hospitals, research and development services oriented primarily to employees, and public and quasi-public uses. (City of Goleta, 2006).

5.11.2. Regulatory Background

This section includes a description of the land use and planning regulatory framework. No federal or state regulations or policies related to land use and planning are applicable to the Project.

Local

City of Goleta General Plan Land Use Element. The purpose of the City's Land Use policies is to define Goleta's planned long-range development pattern and physical character, as well as the extent and distribution of future growth in the city. The following policy in the General Plan Land Use Element generally relates to the proposed Project (City of Goleta, 2006)

LU 4 Office and Industrial Uses. [GP/CP]

Objective: To provide lands in areas suitable for businesses that create diverse types of employment opportunities and related economic activities where impacts of these uses on the surrounding residential neighborhoods can be minimized and where traffic impacts can be adequately managed.

5.11.3. Environmental Impacts and Mitigation Measures

Thresholds of Significance

A significant land use and planning impact would be expected to occur if the proposed Project resulted in any of the impacts noted in the CEQA Appendix G checklist. There are no additional thresholds defined 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 physically divide an established community?

LESS THAN SIGNIFICANT. The Project would be in an existing vacant property. The site is located at the end of a lightly travelled surface street. The closest residential community to the Project is 200 feet to the southeast – the Mariposa at Ellwood Shores elder care facility. The Hideaway residential neighborhood is located over 300 feet to the west and west of the existing Ellwood Generating Station (EGS) adjacent to the Project site boundary. The Project would not physically divide an established community. Impacts would be less than significant, and no mitigation is required.

(b) Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

NO IMPACT. Upon approval of the proposed rezone of the site, the proposed Project would be consistent with the objective for Office and Industrial uses of the City of Goleta General Plan, as listed above in Section 5.11.1, Setting. Table 2-3 in the General Plan Land Use Element identifies Utilities as an allowable use for the I-OI land use category. The proposed Project is consistent with this land use category because the BESS would support the electric utility infrastructure in the City of Goleta by storing energy and discharging it onto the grid during peak demand periods, to be used by the public. Scale Microgrids Solutions Operating, LLC would be required to obtain all applicable ministerial permits prior to commencing Project activities. The proposed Project does not cause an environmental impact due to a conflict with any applicable land use plans, policy, or regulation. Therefore, no impacts would occur.

5.11.3.1. Impact Conclusions and Mitigation Measures

The proposed Project would result in less than significant impacts related to land use and planning. Thus, no mitigation measures are required.

5.12. Mineral Resources

MINERAL RESOURCES

Would the project:

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a) Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state?	☐	☐	☐	☒
(b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

Significance criteria established by CEQA Guidelines, Appendix G.

5.12.1. Setting

Mineral resources of significance found and extracted in Santa Barbara County include construction aggregate deposits (Portland cement concrete-grade, asphalt concrete-grade, and base and fill), as well as gold, copper, zinc, chrome, antimony, silver, uranium, mercury, gypsum, limestone and bentonite from the Los Padres National Forest (Busch and Miller, 2011a; USFS, 2025).

The Conservation Element of the City of Goleta General Plan states that no significant mineral resources exist within the city's Planning Area (City of Goleta, 2006, p. 4-1). A review of California Geological Survey (CGS) data indicate the City of Goleta has no active aggregate operations within their jurisdiction, and the proposed Project is in an area of incorporated city and thus does not have a Mineral Resource Zone (MRZ) designation (Busch and Miller, 2011a; 2011b). There are no active mining operations in the immediate vicinity of the proposed Project. The California Department of Conservation (DOC) Division of Mine Reclamation identifies one sand and gravel quarry approximately 1.9 miles north of the proposed Project site (DOC, 2016).

5.12.2. Regulatory Background

State

California Surface Mining and Reclamation Act of 1975 (SMARA). SMARA requires that the State Geologist classify land into MRZs according to the known or inferred mineral potential of the land. The California Department of Conservation's Office of Mine Reclamation (OMR) and the State Mining and Geology Board (SMGB) are jointly charged with administration of the Act's requirements. The OMR provides technical assistance to lead agencies and operators, maintains a statewide database of mine locations and operational information, and is responsible for matters involving SMARA compliance. The SMGB promulgates regulations to clarify and interpret SMARA requirements in addition to serving as a policy and appeals board (DOC, 2025). The SMGB has the authority to further regulate the authority of the local agencies if it finds that the agencies are not in compliance with the provisions of SMARA.

Mineral resources have been mapped using the California Mineral Land Classification System, which include the following four MRZs:

- **MRZ-1:** Areas where adequate information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence;
- **MRZ-2:** Areas where adequate information indicates that significant mineral deposits are present, or where it is judged that a high likelihood exists for their presence;
- **MRZ-3:** Areas containing mineral deposits, the significance of which cannot be evaluated; and
- **MRZ-4:** Areas where available information is inadequate for assignment to any other zone.

5.12.3. Environmental Impacts and Mitigation Measures

Thresholds of Significance

A significant impact on mineral resources would be expected to occur if the proposed Project resulted in any of the impacts in the CEQA Appendix G checklist. There are no additional thresholds defined 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 result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state?

NO IMPACT. The proposed Project and the surrounding vicinity are not located within a classified Mineral Resource Zone and there are no known important mineral resources that would be impacted by the Project. Therefore, the Project would not result in the loss of availability of a known mineral resource of value to the region or residents of the state. No impacts would occur.

(b) Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

NO IMPACT. As stated above, there are no designated Mineral Resource Zones in the proposed Project vicinity, and no mineral resource recovery sites identified or delineated in the City of Goleta General Plan. Therefore, the Project would have no impact on any locally important mineral resource recovery sites. No impacts would occur.

5.12.3.1. Impact Conclusions and Mitigation Measures

The proposed Project would result in no impacts to mineral resources, and therefore no mitigation measures are required.

5.13. Noise

NOISE				
Would the project result in:				
	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
(b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
(c) For a project located within the vicinity of a private airstrip or 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 expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

Significance criteria established by CEQA Guidelines, Appendix G.

5.13.1. Setting

Existing Conditions

Community Noise. To describe environmental noise and to assess project impacts on areas that are sensitive to community noise, a measurement scale that simulates human perception is used. The A weighted scale of frequency sensitivity accounts for the sensitivity of the human ear, which is less sensitive to low frequencies, and correlates well with human perceptions of the annoying aspects of noise. The A weighted decibel scale (dBA) is cited in most noise criteria. Decibels are logarithmic units that can be used to conveniently compare wide ranges of sound intensities.

Community noise levels can be highly variable from day to day as well as between day and night. For simplicity, sound levels are usually best represented by an equivalent level over a given time period (Leq) or by an average level occurring over a 24-hour day-night period (Ldn). The Leq, or equivalent sound level, is a single value (in dBA) for any desired duration, which includes all of the time-varying sound energy in the measurement period, usually one hour. The L50 is the median noise level that is exceeded fifty percent of the time during any measuring interval. The Ldn, or day-night average sound level, is equal to the 24 hour A-weighted equivalent sound level with a 10 decibel penalty applied to nighttime sounds occurring between 10:00 p.m. and 7:00 a.m. Community Noise Equivalent Level (CNEL) is another metric that is the average equivalent A-weighted sound level during a 24 hour day, obtained after addition of five decibels to sound levels in the evening from 7:00 p.m. to 10:00 p.m. and after addition of 10 decibels to sound levels in the night from 10:00 p.m. to 7:00 a.m. To easily estimate the day-night level caused by any noise source emitting steadily and continuously over 24 hours, the Ldn is 6.4 dBA higher than the source's Leq. For example, if the expected continuous noise level from equipment is 50.0 dBA Leq for every hour, the day-night noise level would be 56.4 dBA Ldn.

Community noise levels are usually closely related to the intensity of human activity. Noise levels are generally considered low when below 45 dBA, moderate in the 45 to 60 dBA range, and high above 60 dBA. In wilderness areas, the Ldn noise levels can be below 35 dBA. In small towns or wooded and lightly used residential areas, the Ldn is more likely to be around 50 or 60 dBA. Levels around 75 dBA are more common in busy urban areas, and levels up to 85 dBA occur near major freeways and airports. Although people often accept the higher levels associated with very noisy urban residential and residential-commercial zones, they nevertheless are considered to be adverse to public health.

Surrounding land uses dictate what noise levels would be considered acceptable or unacceptable. Lower levels are expected in rural or suburban areas than what would be expected for commercial or industrial zones. Nighttime ambient levels in urban environments are about seven decibels lower than the corresponding daytime levels. In rural areas away from roads and other human activity, the day-to-night difference can be considerably less. Areas with full-time human occupation and residency are often considered incompatible with substantial nighttime noise because of the likelihood of disrupting sleep. Noise levels above 45 dBA at night can result in the onset of sleep interference. At 70 dBA, sleep interference effects become considerable (U.S. EPA, 1974).

Noise Environment in the Project Area. As described in the Noise Assessment Report (see Appendix L), conducted by ERM on January 22, 2025, ERM characterized the existing noise environment in the area through an ambient noise measurement program carried out from March 27 to March 28, 2024. The program involved continuous measurement of the existing Leq sound levels over a 24-hour period at the most proximate noise-sensitive areas (NSAs), which includes the Mariposa at Ellwood elder care facility immediately southeast of the site, and short-term measurements during the day and at night at other locations to obtain ambient data representative of surrounding NSAs. Short-term measurements were conducted for a 1-hour duration at each location during the day, and for a 30-minute duration at night at each location. Ambient measurement locations were selected in order to obtain data representative of existing conditions for an area (i.e., some measurement locations are not at the discrete NSA locations used in the modeling assessment).

The ambient noise measurement locations, the discrete NSA locations used for the modeling assessment, and the identification of which ambient data correspond to each NSA modeling location are provided in Table 5.13-1 and depicted in Figure A-1 in Appendix L, Noise Assessment Report.

Table 5.13-1. Ambient Noise Measurement and Noise Sensitive Area (NSA) Locations

Ambient Noise Measurement Location	NSA Location ⁽¹⁾	Ambient Noise Level (Ldn)
Mariposa at Ellwood Shores (Continuous Location)	NSA 1 – Mariposa at Ellwood Shores	60.3
Calle Del Sur	NSA 2 – Calle Del Sur	61.4
Ellwood Mesa Open Space Lot	NSA 3 – Elderberry Drive	59.5
Tech Park at Hollister Driveway	NSA 4 – Pebble Beach Drive	53.7
Mariposa at Ellwood Shores (Continuous Location)	NSA 5 – Sanderling Lane	60.3
Mariposa at Ellwood Shores (Continuous Location)	NSA 6 – Ellwood School	60.3

(1) Ambient noise level measurements were conducted at locations near to the actual NSA. The locations in this column are for where the ambient data are considered representative of the NSA. These NSAs are included in the noise model.

(2) Distance to nearest school building.

Discussions regarding equipment used for noise measurements and measurement methodologies considered are included in Appendix L, Noise Assessment Report (ERM, 2025).

Source: ERM, 2025

Noise Sensitive Areas. The nearest noise-sensitive areas to the Project site include a single-family residential neighborhood to the west, the elementary school to the east, and the elder care facility to the southeast. More specifically, The Ellwood Elementary School is located approximately 350 feet east of the Project site, beyond the parking lot that borders the site's eastern boundary; The Hideaway is a single-family residential neighborhood located approximately 320 feet east of the site, just beyond the Project-adjacent SCE substation, that borders the Project's eastern boundary, and Las Armas Road; and the Mariposa at Ellwood Shores elder care facility is located approximately 260 feet southeast of the center of the Project site, beyond the access road of the parking lot adjacent to and west of the site.

Corona Noise

Corona is one of the phenomena associated with all energized electrical devices, including high voltage transmission lines. The localized electric field near a conductor can be sufficiently concentrated to ionize air close to the conductors. This can result in a partial discharge of electrical energy called a corona discharge, or corona. The corona effect is the physical manifestation of discharged electrical energy into very small amounts of sound, radio noise, heat, and chemical reactions with air components. It is a phenomenon associated with all energized electrical devices but is especially common with high-voltage power lines.

The amount of corona produced by a power line is a function of several factors, including line voltage, conductor diameter, conductor locations in relation to each other, condition of conductors and hardware, and local weather conditions including power line elevation above sea level. Corona typically becomes a design concern for 230 kV and higher power lines that are overhead (i.e., transmission lines on poles or towers). It is less noticeable for lines that are operated at lower voltages (i.e., subtransmission and distribution-sized lines).

The Proposed Project includes a new 66 kV line, and the distribution lines that are a part of the BESS facility would be low and medium voltage (such as 4, 12, 15, or 34 kV). The electric field gradient is greatest at the conductor surface. Larger-diameter conductors have lower electric field gradients at the conductor surface and, therefore, lower corona noise than smaller-diameter conductors. The corona effect would not be a design concern for the 200-foot-long underground interconnection line from the BESS to the SCE substation, or for the underground electrical collection and communications lines within the BESS facility, regardless of voltage level, because the energized conductors are fully enclosed in a semi-conducting layer within insulated cables that serve to equalize the electrical gradient at the surface of the components.

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

The proposed Project involves installation of a 200-foot-long underground 66 kV interconnection line to the existing SCE substation located within the EGS switchyard. The SCE substation is interconnected with the existing SCE 66 kV electrical subtransmission line along Las Armas Road. The Project would not change the operating voltages of the existing SCE substation, and circuits operating at 60 kV typically cause noise at levels comparable to the ambient baseline noise levels. At levels comparable to the ambient baseline, the impact of audible noise from the corona effect would be less than significant.

5.13.2. Regulatory Background

Regulating environmental noise is generally the responsibility of local governments. However, in the absence of local numerical thresholds, this analysis adopts those thresholds promulgated by the National Institute for Occupational Safety and Health (NIOSH). The Federal Transit Administration (FTA) *Transit Noise and Vibration Impact Assessment Manual* establishes guidelines on recommended maximum vibration levels to protect public health and welfare (FTA, 2018), and the State of California maintains

recommendations for local jurisdictions in the General Plan Guidelines published by the Governor’s Office of Planning and Research (OPR, 2017). The following summarizes the federal and local requirements:

National Institute for Occupational Safety and Health. The *Criteria for a Recommended Standard: Occupational Noise Exposure*, prepared in 1998 by NIOSH, establishes the following noise level thresholds for construction activities:

Table 5.13-2. NIOSH Recommended Noise Exposure Level for Construction Activity

Noise Exposure Level (dBA)	Duration of Exposure
82	16 hours
85	8 hours
88	4 hours
91	2 hours
94	1 hour
97	30 minutes
100	15 minutes

Source: NIOSH, 2025

Federal Transit Administration. The FTA’s *Transit Noise and Vibration Impact Assessment Manual* (2018) provides the following vibration thresholds for damage caused from construction activity:

Table 5.13-3. FTA Construction Vibration Damage Criteria

Building Category/Structural Category	PPV, in/sec	Approximate Lv (VdB re 1 μ in/sec rms)
I. Reinforced concrete, steel or timber (no plaster)	0.5	102
II. Engineered concrete and masonry (no plaster)	0.3	98
III. Non-engineered timber and masonry buildings	0.2	94
IV. Buildings extremely susceptible to vibration damage	0.12	90

Source: FTA, 2018

Table 5.13-4. FTA Indoor Ground-Borne Vibration Impact Criteria for General Vibration Assessment

Land Use Category	Ground-Borne Vibration Impact Levels (VdB re 1 μ in/sec rms)		
	Frequent Events ^{a)}	Occasional Events ^{b)}	Infrequent Events ^{c)}
Category 1: Buildings where vibration would interfere with interior operations	65 VdB ^{d)}	65 VdB ^{d)}	65 VdB ^{d)}
Category 2: Residences and buildings where people normally sleep	72 VdB	75 VdB	80 VdB
Category 3: Institutional land uses with primarily daytime use	75 VdB	78 VdB	83 VdB

Source: FTA, 2018

a) More than 70 events per day

b) 30-70 events per day

c) Fewer than 30 events per day

d) From FTA, 2018: “This criterion limit is based on levels that are acceptable for most moderately sensitive equipment such as optical microscopes.”

City of Goleta General Plan. The City of Goleta General Plan contains a noise element in Chapter 9.0 of the Plan. The noise element defines sensitive noise receptors as uses including, but not limited to, residential neighborhoods, schools, libraries, hospitals, and rest homes. The noise element establishes

noise compatibility standards for various land use types. Provided in Figure 1 of Appendix L, Noise Assessment Report, is a reproduction of Table 9-2 from the noise element that summarizes the noise and land use compatibility criteria (City of Goleta, 2006). The following Goleta General Plan Noise Element policies are applicable to the proposed Project:

NE 1.3 Noise Buffers. [GP] When feasible, the City should require an open space or other noise buffer between new projects that are a source of noise and nearby sensitive receptors. The nature and extent of the noise buffer shall be determined based upon site-specific conditions.

NE 1.5 Acceptable Noise Levels. [GP] New construction and substantial alterations of existing construction shall include appropriate noise insulation measures (such as insulation, glazing, and other sound attenuation measures) so that such construction or renovations comply with state and building code standards for allowable interior noise levels. The intent of this policy is to require improved soundproofing for both noise receivers and sources.

NE 6.4 Restrictions on Construction Hours. [GP] The City shall require, as a condition of approval for any land use permit or other planning permit, restrictions on construction hours. Noise-generating construction activities for projects near or adjacent to residential buildings and neighborhoods or other sensitive receptors shall be limited to Monday through Friday, 8:00 a.m. to 5:00 p.m. Construction in non-residential areas away from sensitive receivers shall be limited to Monday through Friday, 7:00 a.m. to 4:00 p.m. Construction shall generally not be allowed on weekends and state holidays. Exceptions to these restrictions may be made in extenuating circumstances (in the event of an emergency, for example) on a case-by-case basis at the discretion of the Director of Planning and Environmental Services. All construction sites subject to such restrictions shall post the allowed hours of operation near the entrance to the site, so that workers on site are aware of this limitation. City staff shall closely monitor compliance with restrictions on construction hours and shall promptly investigate and respond to all noncompliance complaints.

City of Goleta Municipal Code. The City of Goleta has a noise ordinance in Section 9.09.040 (Specific Noise Restrictions) of the City's municipal code. The ordinance states that construction shall only be conducted pursuant to the hours specified in GMC Section 17.39.070(G), which limits construction activities within 1,600 feet of sensitive receptors are limited to Monday through Friday, 8:00 a.m. to 5:00 p.m. Furthermore, as set forth in GMC Section 17.39.070(F), the provisions do not apply to capital improvement projects, maintenance and repair or excavation by a public utility which is subject to the jurisdiction of the Public Utilities Commission and where such work is necessary for the immediate preservation of the public health, safety, or welfare and where such necessity makes it necessary to construct, repair or excavate during the prohibited hours (City of Goleta, 2025).

County of Santa Barbara Environmental Thresholds and Guidelines Manual. Chapter 12 (Noise Thresholds) of the County's *2002 Environmental Thresholds and Guidelines Manual* establishes noise threshold criteria adopted by the City of Goleta. The document specifies that a Community Noise Equivalent Level (CNEL) of 65 dBA is the maximum exterior noise exposure level that is compatible with noise sensitive uses, unless noise mitigation features are incorporated into the design of the noise sensitive use. Additionally, the City guidelines specify that a project will have a significant effect on the environment if it substantially increases the ambient noise level for noise sensitive uses adjoining areas. A significant effect may also occur if ambient noise levels are significantly increased even if they remain below 65 dBA CNEL. The document does not provide a numerical definition of a substantial increase (County of Santa Barbara, 2002).

5.13.3. Environmental Impacts and Mitigation Measures

Thresholds of Significance

Based on 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), the following thresholds are used to determine whether significant noise impacts would occur:

Threshold NOI-1. A development that would generate noise levels in excess of 65 dBA CNEL and could affect sensitive receptors would generally be presumed to have a significant impact.

Threshold NOI-2. Outdoor living areas of noise sensitive uses that are subject to noise levels in excess of 65 dBA CNEL would generally be presumed to be significantly impacted by ambient noise. A significant impact would also generally occur where interior noise levels cannot be reduced to 45 dBA CNEL or less.

Threshold NOI-3. A project would generally have a significant effect on the environment if it would increase substantially the ambient noise levels for noise sensitive receptors in adjoining areas. Per Threshold 1 above, this may generally be presumed to occur when ambient noise levels affecting sensitive receptors are increased to 65 dBA CNEL or more. However, a significant affect may also occur when ambient noise levels affecting sensitive receptors increase substantially but remain less than 65 dBA CNEL, as determined on a case-by-case level.

Threshold NOI-4. Noise from grading and construction activity proposed within 1,600 feet of sensitive receptors, including schools, residential development, commercial lodging facilities, hospitals or care facilities, would generally result in a potentially significant impact. According to the US EPA guidelines, the average construction noise is 95 dBA at a 50-foot distance from the source. A 6 dB drop occurs with a doubling of the distance from the source. Therefore, locations within 1,600 feet of the construction site would be affected by noise levels over 65 dBA. Construction within 1,600 feet of sensitive receptors on weekdays outside of the hours of 8:00AM to 5:00PM and on weekends would generally be presumed to have a significant effect. Noise attenuation barriers and muffling of grading equipment may also be required. Construction equipment generating noise levels above 95 dBA may require additional mitigation.

With regard to Threshold 3, the term "substantial increase" is not defined within the Thresholds Manual. The limits of sound perception by humans in a laboratory environment is around 1.5 dB. Under ambient conditions, people generally do not perceive that noise has clearly changed until there is a 3 dB difference. A threshold of 3 dB is commonly used to define "substantial increase." Therefore, for purposes of this analysis, an increase of 3 dBA CNEL would be a significant impact. Increases of 3.0 dB require a doubling sound energy. For example, for impacts related to traffic noise, existing traffic volumes along a roadway would need to be doubled. Projects usually do not, by themselves, cause traffic volumes to double. Therefore, traffic noise impacts are generally a cumulative impact rather than a project-specific impact.

Impact Analysis

Thresholds NOI-1, NOI-2, NOI-3, and NOI-4 are addressed in Checklist Item (a).

(a) Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

DURING CONSTRUCTION - LESS THAN SIGNIFICANT IMPACT. The proposed Project would require an 8-month duration of construction activities that include mobilizing construction equipment, crews, and materials, grading, excavating, installing concrete foundations, paving, and installing BESS equipment. The construction activities would require use of vehicles and heavy-duty equipment capable of generating noise within and around the Project site and along the roads used to access the site. Along with on-highway vehicles including trucks, the following types of construction equipment could be used at the site: auger, backhoe

or loader, crane, compactor, generator, tractor, water and dump trucks, concrete mixer, drill rig, lifts, skid steer, and possibly a pile driver during the construction of the foundation pads. As mentioned in Section 4.10.3 of the Project Description, specifically Table 4-4, pending detailed design, selected BESS equipment foundations may be installed on piles, as opposed to slab on grade. This phase would represent the highest potential for construction noise impacts on nearby NSAs. Outside of the site, traffic noise would be caused by vehicles transporting equipment and materials to the site, trucks removing construction-related debris, and workers commuting to and from the work site.

When estimating construction noise levels that may occur at the nearest noise-sensitive receptors and in order to evaluate the potential health-related effects (physical damage to the ear) from construction noise, the construction equipment noise levels were calculated using worst-case conditions and modeled using the Federal Highway Administration's Roadway Construction Noise Model (RCNM), see Appendix M, Noise and Vibration Modeling. As mentioned above, neither the City's *2002 Environmental Thresholds and Guidelines Manual*, the City's Municipal Code, nor the General Plan set thresholds for construction noise. In the absence of these thresholds, the results of the modeling are compared against the construction-related noise level threshold established in the *Criteria for a Recommended Standard: Occupational Noise Exposure* prepared in 1998 by NIOSH. The NIOSH construction-related noise level threshold starts at a time-weighted average (TWA) of 85 dBA over 8 hours per day; for every 3 dBA increase, the exposure time is cut in half. This reduction results in noise level thresholds of TWA 88 dBA over 4 hours per day, TWA of 92 dBA over 1 hour per day, TWA 96 dBA over 30 minutes per day, and up to a TWA of 100 dBA over 15 minutes per day. For the purposes of this analysis, the more conservative threshold of 85 dBA Leq is used as an acceptable threshold for construction noise potentially experienced at the nearby sensitive receptors (NIOSH, 2025).

The Project acknowledges that construction equipment is not typically positioned at any one location during the duration of construction activities, but rather dispersed throughout the site and at various distances from sensitive receptors. Therefore, the FTA guidance for calculating construction noise, which recommends modeling construction noise produced by all construction equipment from the center of the Project site, will be employed for the purposes of the proposed Project (FTA 2018). The center of the Project site would be approximately 260 feet from the nearest sensitive receptor (Mariposa at Ellwood elder care facility). The anticipated short-term construction noise levels generated for the necessary proposed Project construction equipment is presented in Table 5.13-5.

Table 5.13-5. Average Construction-Generated Noise Levels (dBA) Experienced at Nearest Residence

Phase	Combined Equipment Noise Level (dBA at 260 ft)	Construction Noise Threshold (NIOSH Standard in dBA Leq)	Exceedance of Threshold?
Site Clearing	69.3	85	No
Site Preparation/Rough Grading	71.4	85	No
Fine/Pad Grading, Excavation for Underground Conduit/Utilities, and Stormwater LID Areas	72.0	85	No
Construction of Foundation Pads	79.7	85	No
BESS Container and Conduit Installation	71.3	85	No
Project Substation/Switchyard Gen-Tie Installation	72.0	85	No
Paving for Drive Aisles	64.5	85	No
Landscaping, Lighting, Architectural Finishes	68.9	85	No

Source: Roadway Construction Noise Model Analysis. See Appendix M for modeled data outputs (FHWA, 2006).

As shown in Table 5.13-5, Project on-site construction activities would not exceed the NIOSH threshold of 85 dBA Leq at the nearest noise-sensitive receptors. While no noise standard would be exceeded by construction of the proposed Project, the Project is located within close proximity to noise-sensitive land uses, including the elder care facility to the southeast, the residential neighborhood west of the site, and the elementary school to the east. As described above, the city noise ordinance states that construction activity is prohibited during certain times of the day, notably outside of the hours of 8:00 a.m. to 5:00 p.m. Monday through Friday. It is expected that the short duration of construction activities would be audible during daytime hours in the vicinity of the nearest residences west, east, and southeast of the site. The proposed Project's general construction activities would be limited to a 9-hour timeframe (8:00 a.m. to 5:00 p.m.) on weekdays, due to the City's noise ordinance, and the recommended condition of approval N1, which is a standard City requirement that establishes day and time limits on proposed construction operations. Thus, this impact would be less than significant.

During decommissioning, activities would be similar to construction, except materials would be removed and exported from the site, rather than imported, and therefore impacts during decommissioning would be similar.

DURING OPERATIONS AND MAINTENANCE - LESS THAN SIGNIFICANT IMPACT. ERM conducted operational noise modeling for the Project using the CadnaA software by DataKustik, which incorporates ISO 9613 standards to account for noise propagation factors such as ground absorption, topography, atmospheric effects, and source reflections. A conservative ground absorption value of 0.5 was used, with no credit taken for offsite structures, vegetation, or foliage. Primary noise sources include 36 Tesla 4-hour 2 XL Megapack battery units and 18 onsite transformers, with fan noise being the most significant contributor. Noise emissions data for the Megapacks were based on Tesla data from the Goleta Energy Storage project, which analyzes the noise emissions for the same type of Megapack batteries (Tesla Megapack 2XL), assuming all fans operate concurrently at 40 percent capacity during high-temperature conditions. Transformer noise levels were estimated using Edison Electric Institute methodology. Receptors were modeled at ground level and second-story elevations, and noise contours were developed to illustrate impacts across the broader area (see Figures 5.13-1 and 5.13-2. Equipment details and modeling inputs are provided in Appendix L, Noise Assessment Report (ERM, 2025).

Upon completion of construction, the occasional and infrequent nature of maintenance activities associated with the proposed Project would not result in noise levels exceeding the standards established in the local General Plan, Noise Ordinance, or the City's *2002 Environmental Thresholds and Guidelines Manual*. The Project involves construction and operation of a BESS facility and a 66 kV interconnection line. Currently, there are no noise-generating sources on the site. Project components that may generate operational noise include HVAC units and power transformers. An 8-foot-high ornamental metal no-climb fence will be installed around the perimeter access road for site security, along with vegetative screening or other visual buffers, consistent with General Plan Policy NE 1.5. The center of the Project site is located approximately 260 feet from the northwest corner of the property line of the Mariposa at Ellwood elder care facility, situated southeast of the site. As shown in Table 6 of Appendix L, Noise Assessment Report, the highest modeled increase in noise would be 0.7 dBA Ldn at the elder care facility (NSA 1). As a significant impact would require noise levels reaching 65 dBA CNEL at nearby NSAs, the Project's operational noise would result in a less than significant impact.

Although it is not anticipated that noise would be a nuisance to nearby residents, a recommended condition of approval, N2 Noise Complaints, is included, to address verified noise complaints received by the City. This would ensure that impacts are less than significant by requiring a noise survey, and if nuisance noise is detected, implementing noise reduction measures as outlined in the condition of approval N2.

Figure 5.13-1. Operational Noise First Floor Map

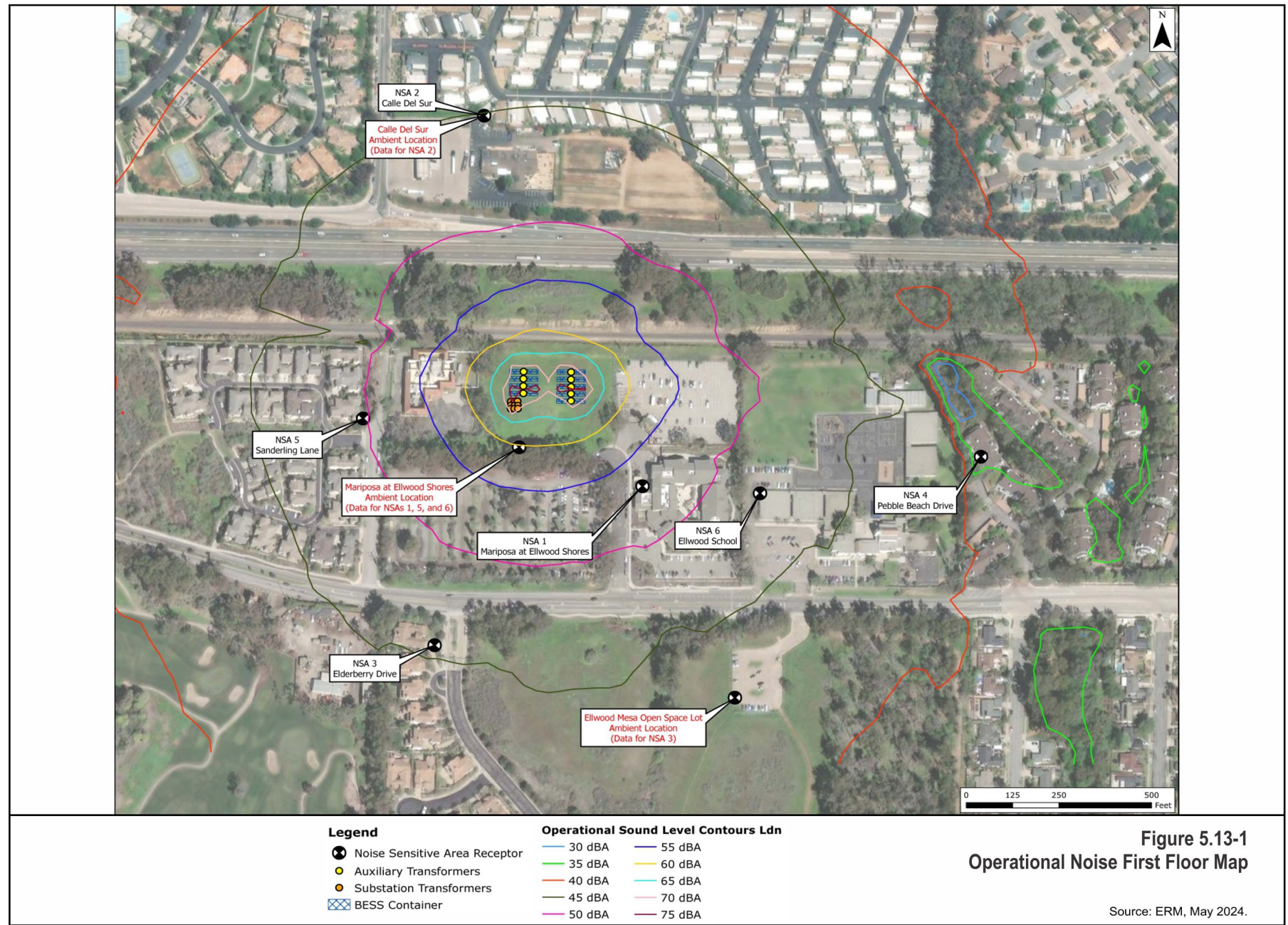
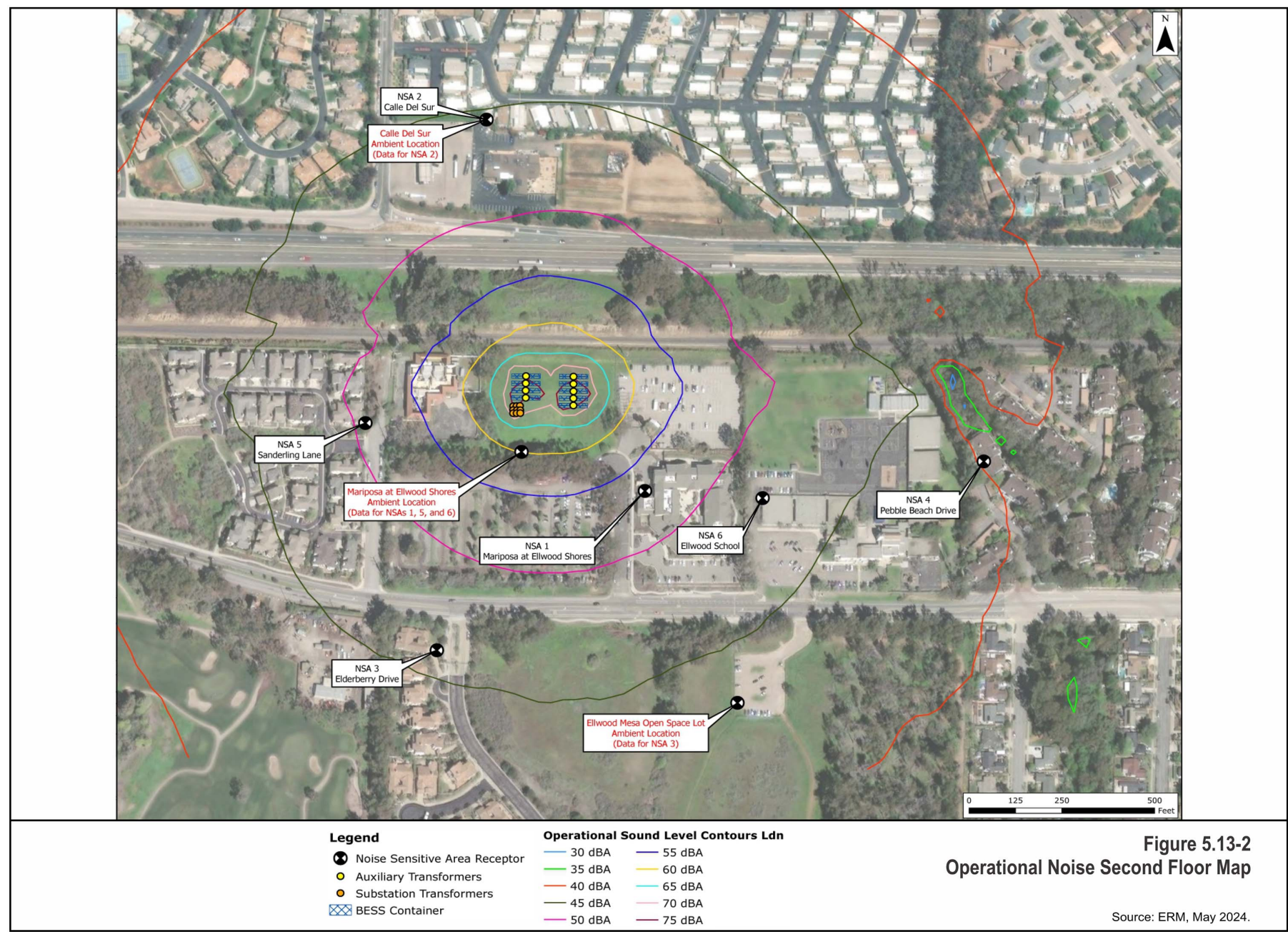


Figure 5.13-2. Operational Noise Second Floor Map



(b) Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

LESS THAN SIGNIFICANT IMPACT. Groundborne vibration is a result of vibrating objects coming into contact with the ground, and that vibration radiating through the ground to nearby buildings. Architectural and structural damage and perceptibility thresholds for residential and historic structures in proximity to the types of construction activities have the potential to occur during construction. Architectural damage includes cosmetic damage, such as cracked plaster, etc. Architectural damage is not considered potentially dangerous.

As shown in Table 5.13-6, pile driving has the greatest potential to result in architectural damage to most building types. Most other construction activities require very small (i.e., less than 25 feet) distances between the structure and the construction equipment or the presence of highly fragile buildings for impacts to occur. The City of Goleta does not currently have specific numeric vibration thresholds outlined in its General Plan or Municipal Code. However, the City's Noise Ordinance (Goleta Municipal Code Chapter 9.09) addresses "unwarranted noises, sounds, and vibrations" to preserve public peace and comfort (City of Goleta, 2025). While explicit vibration limits are not detailed, the City emphasizes minimizing noise and vibration impacts, especially near sensitive receptors. For example, the General Plan Policy NE 6.4 restricts construction hours near residential areas to mitigate potential disturbances.

Table 5.13-6. Typical Construction Equipment Vibration Source Levels at 25 Feet

Equipment Type	Approximate PPV at 25 Feet	Approximate Lv¹ at 25 feet
Pile Driver (impact)	1.518	104
Vibratory roller	0.210	94
Large bulldozer	0.089	87
Loaded trucks	0.076	86
Jackhammer	0.035	79

¹ RMS (root-mean-square) velocity in decibels, VdB re 1 micro-in/sec (FTA, 2018)

In the absence of specific local vibration standards, this analysis adopts the FTA vibration impact criteria (Table 5.13-3 above), which suggests that a peak particle velocity (PPV) of 0.2 inches per second is the threshold for potential damage to fragile buildings, while 0.5 inches per second is considered for more robust structures (FTA, 2018).

Human response to vibration can range from annoyance at lower levels to difficulties concentrating or reading at higher levels. Measuring annoyance often uses the ground vibration velocity level in decibel scale, referenced to 10^{-6} inches per second, or vibration decibels (VdB). For infrequent pile driving events (less than 30 drives per day), the FTA impact criteria (Table 5.13-4) for Category 2 (residences and buildings where people normally sleep) land uses is 80 VdB. Typical construction equipment is listed in Table 5.13-6, with vibration levels experienced at 25 feet from the source and expressed in peak particle velocity (PPV) and VdB (vibration decibels).

The activities that would be most likely to cause groundborne vibration would be pile driving activities associated with the Construction of Foundation Pads phase. Impact pile drivers have a typical vibration level of 1.518 PPV and 104 VdB at 25 feet (FTA, 2018). The impact from construction-related vibrations would be confined to the Project site and immediate surroundings, around construction activities and would cease upon completion of the Project. The center of the Project site would be approximately 260 feet from the nearest sensitive receptor (Mariposa at Ellwood elder care facility). The closest battery unit would be approximately 160 feet from the elder care facility's northwest boundary, at the cul-de-sac driveway entrance. As noise from vibration reduces with distance, any effects of groundborne vibration or noise levels would be less than the FTA threshold for damage to buildings. As indicated in Appendix M, Noise and Vibration Modeling, the property line of the elder care facility would experience a 79.8 VdB, which is just below the threshold of annoyance (80 VdB). Furthermore, residents inside the facility would be much further from the pile driving activity and would experience vibrations at a lesser intensity and as

the pile driving activities occur further and further from the southeast corner of the Project site, the vibrational decibel levels would diminish with each new foundation pad. Therefore, there would be a less than significant impact under this criterion.

(c) For a project located within the vicinity of a private airstrip or 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 expose people residing or working in the project area to excessive noise levels?

NO IMPACT. The nearest public airport is located approximately 2.2 miles east of the proposed Project site in the city of Santa Barbara. As stated above in part (a), the temporary and permanent noise levels from the Project would be well within the applicable noise level thresholds and would not impact this or any other airports or airstrips. No excessive noise would result from Project construction or operations that could impact people residing or working near the airstrip. As such, there would be no impact under this criterion.

5.13.3.1. Impact Conclusions and Mitigation Measures

The proposed Project would not result in significant impacts to noise and thus, no mitigation measures are recommended. The following are the recommended conditions of approval for the Project.

N1. Recommended Condition of Approval: Construction Timing. Construction activity and equipment maintenance is limited to the hours between 8 AM and 5 PM Monday through Friday. Exceptions to these restrictions may be made for onsite work for good cause at the sole discretion of the Planning and Environmental Review Director. Exceptions to these restrictions for work in the City Right-of-Way may be made for good cause at the sole discretion of the Public Works Director or designee. Any subsequent amendment to the General Plan noise standard upon which these construction hours are based shall supersede the hours stated herein. No construction can occur on State holidays (e.g., Thanksgiving, Labor Day). Non-noise generating construction activities such as interior plumbing, electrical, drywall and painting (depending on compressor noise levels), are not subject to these restrictions.

Timing: At least one sign near each project site entrance stating these restrictions must be posted on the site. Signs must be a minimum size of 24" x 48." Signs must be in place before the beginning of and throughout grading and construction activities. Violations may result in suspension of permits.

Monitoring/Reporting Party(ies): The Planning and Environmental Review Director must monitor compliance with restrictions on construction hours and must promptly investigate and respond to all complaints.

N2. Recommended Condition of Approval: Noise Complaints. Upon receipt of a verified noise complaint regarding nuisance noise from the project site, the City will require the following:

- (a) The project operator shall conduct a noise survey of the project site conducted by a City-approved noise consultant.
- (b) The project operator shall have a report prepared by a City-approved noise consultant that describes the primary noise sources identified during the survey.
- (c) The noise report shall evaluate the broadband noise level and octave band data obtained by the survey; and determine if there is an audible tone or set of tones or an exceedance of the noise requirements of Zoning Ordinance Section 17.39.070.
- (d) If an exceedance or audible tones are identified, additional noise measurements shall be required to identify the noise source of concern and develop measures to reduce noise levels generated by the fans.
- (e) Noise reduction measures may include, but are not limited to: the use of alternate fan settings, fan speeds, fan blade angle, or even passive barriers. Barriers can be located at ground level and surround the site, or be located along a property line. If specific equipment is the primary source, then the barriers can be located adjacent to the equipment, or placed on the equipment, such as on

top of the MegaPack. At minimum, the noise attenuation barriers must have a weight of two pounds per square foot or greater. This can include, but is not limited to 18-gauge steel sheet, 5/32 glass panels, and 5/8-inch-thick plywood. In addition, the barrier must be solid with no holes, gaps, or perforations and well-sealed to the surface to which it is attached.

Monitoring/Reporting Party(ies): The Planning and Environmental Review Director must promptly respond to all project-related nuisance noise complaints, require the project operator to implement the required noise surveys described above, and monitor compliance with noise complaint resolution measures.

5.14. Population and Housing

POPULATION AND HOUSING

Would the project:

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
(b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Significance criteria established by CEQA Guidelines, Appendix G.

5.14.1. Setting

The Project site is surrounded by a mix of commercial, public/quasi public, and residential land uses. Overall, this area of the City of Goleta is substantially built out and land use density has increased over time. Substantial increases in population can be achieved only by the development of higher density housing, either on vacant land or through redevelopment of existing land uses. Table 5.14 1 provides existing population, housing, and employment estimates for the County of Santa Barbara and the City of Goleta.

Table 5.14-1. Year 2025 Existing Conditions – Population, Housing, and April 2025 Employment: City of Goleta and County of Santa Barbara

Location	Population	Housing Units		Employment	
		Total Units	Vacancy Rate	Total Employed*	Unemployment Rate
City of Goleta	32,747	13,155	4.8%	18,700	2.9%
County Santa Barbara	447,132	163,361	6.3%	213,000	4.9%

*Accounts for population greater than 16 years of age and in Labor Force.

Source: CA DOF, 2025; CA EDD, 2025

5.14.2. Regulatory Background

This section includes a description of the population and housing regulatory framework. There are no federal or state regulations, plans, and standards for population and housing that apply to the proposed Project.

City of Goleta General Plan Housing Element. The City's housing policies are intended to respond to housing needs within the context of the entire General Plan. The policies and programs of the element are intended to provide more detailed direction and the means for accomplishing the city's goals. The city's goals aim to provide a balanced and diverse community, a variety of housing types and choices, great neighborhoods, housing for special needs populations, employee housing, and community and regional collaboration (City of Goleta, 2023). The following City of Goleta General Plan Housing Element policy and its objectives generally relate to the proposed Project:

■ Policy HE 4: Energy Conservation and Sustainable Development [GP]

Objectives: Promote energy conservation by encouraging energy efficiency, renewable energy sources, sustainable building materials, and transit-oriented development.

HE 4.3 Use of Renewable Energy Sources. For new projects, the City encourages the incorporation of renewable energy sources. The City will consider incorporating renewable energy sources that do not have adverse effects on the environment or on any adjacent residential uses. Solar access

must be protected in accordance with the State of California Solar Rights Act. New development cannot impair the performance of existing solar energy systems. Compensatory or mitigation measures may be considered in instances where there is no reasonable alternative.

Time period: Throughout the planning period

Responsible party: Planning and Environmental Review Department

Regional Housing Needs Assessment (RHNA). The City of Goleta Housing Element contains adopted plans and regulations that enable a variety of housing types to be built, minimize constraints such as fees and permit procedures, and assist affordable housing development to meet the city's housing allocations identified through the state's Regional Housing Needs Assessment process. The Housing Element identifies adequate sites with appropriate zoning densities, development standards, and infrastructure to accommodate the community's need for new housing at all price levels, and – where appropriate and legally possible – remove constraints to housing development. In addition to the five income categories established in state housing law (extremely-low, very-low, low, moderate, and above-moderate), Goleta has identified an additional category—workforce housing (120 to 200 percent of median income) in recognition of the high housing costs in the south coast area of Santa Barbara County (City of Goleta, 2023).

5.14.3. Environmental Impacts and Mitigation Measures

Thresholds of Significance

A significant impact on population and housing would be expected to occur if the proposed Project resulted in any of the impacts in the CEQA Appendix G checklist. There are no additional thresholds defined 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 induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

LESS THAN SIGNIFICANT. The proposed Project is in a largely developed urban area. There would be no direct population growth induced by the Project, as it would not provide new housing and would not require an expansion of the workforce to construct, service, and maintain the BESS facility. Scale Microgrids, LLC is expected to provide staffing for the Project. During the 8-month construction period, the proposed Project would provide short-term jobs for a small workforce. Construction needs are not anticipated to result in workers relocating to the area. The proposed Project would result in neither a permanent increase in population nor a decrease in available housing.

The construction and operation of the BESS facility would support future planned growth by ensuring reliable electricity to the area served by SCE and would result in an indirect effect of facilitating the development of the surrounding area of the City of Goleta. Greater electrical reliability would provide developmental and employment opportunities to the regional workforce. While further development or redevelopment in the City of Goleta may induce some population growth, this has already been accounted for through the City's General Plan Housing Element (City of Goleta, 2023) Regional Housing Needs Assessment. Therefore, there would be a less than significant effect as a result of the proposed Project.

(b) Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

NO IMPACT. The proposed Project would be within an existing vacant property and would not displace any housing or people and, therefore, would not necessitate the construction of replacement housing.

Construction of the BESS facility would occur over approximately 8 months and would not require the relocation of workers to the region. Therefore, no impacts would occur.

5.14.3.1. Impact Conclusions and Mitigation Measures

The proposed Project would not result in significant impacts to population and housing, and thus, no mitigation measures are recommended.

5.15. Public Services

PUBLIC SERVICES				
Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
(a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
i) Fire Protection?	☐	☐	☒	☐
ii) Police Protection?	☐	☐	☒	☐
iii) Schools?	☐	☐	☒	☐
iv) Parks?	☐	☐	☐	☒
v) Other Public Facilities?	☐	☐	☐	☒

Significance criteria established by CEQA Guidelines, Appendix G.

5.15.1. Setting

For the area where the proposed Project would be located, public services, including fire and police services, as well as public and private schools, parks and recreational areas, and other public services, are provided by the City of Goleta, Santa Barbara County, special districts, and private entities.

5.15.1.1. Fire Protection

The Santa Barbara County Fire Department (SBCFD) serves the City of Goleta and provides fire protection to the Project site and the surrounding area (City of Goleta, 2025). The county has 3 battalions and a total of 16 fire stations, with around 260 full-time equivalent personnel, that respond to all types of emergencies including fire, medical, rescue, and hazardous material incidents (SBCFD, 2022a). Each fire station is staffed around the clock with a minimum of 3 firefighters and a Type I (structure) engine. Specialized equipment such as Type III (wildland) fire engines, water tenders, paramedic rescue ambulances, technical rescue and water rescue equipment are strategically placed throughout the county and are cross-staffed with existing engine personnel (SBCFD 2022b). Three county fire stations are in Goleta (with a proposed fourth one currently in environmental review). The fire station nearest the site is Fire Station 11, located 1.7 miles southeast of the Project site, at 6901 Frey Way, and it also contains a separate building on its premises for the SBCFD Battalion 1 headquarters (SBCFD, 2022c). The current SBCFD response time standard aims to be consistent with the Emergency Medical Services Agency (EMSA) response time standards, which have a goal of first responder arrival within 4 minutes or less for 90% of incidents, and for an Advanced Life Support (ALS) unit to arrive within 8 minutes for 90% of incidents that require advanced life support (SBCFD, 2022b).

5.15.1.2. Police Protection

Police services for Goleta are provided by the Santa Barbara County Sheriff's Office (SBSO). The Camino Real Marketplace Sheriff's Substation is located at 7042 Marketplace Drive and is about 1.5 miles east of the Project site. SBSO has approximately 600 employees and 150 volunteers at more than 25 work sites located throughout the county. Although the number varies, the SBSO currently includes approximately 260 law enforcement deputies and 200 custody deputies (SBSO, 2025). According to the SBCO Public Records Center, the SBSO does not provide response times to specific areas or locations. As per their performance measures, a Deputy Sheriff will arrive at 75 percent of his/her assigned in-progress calls

(person or property) within 8 minutes of dispatch (Personal Communication; Sergeant Calderon, May 20, 2025).

5.15.1.3. Schools

The Goleta Unified School District (GUSD) operates public schools within the City of Goleta (GUSD, 2025). There are numerous private and parochial schools in the city as well. The Ellwood Elementary School is located approximately 340 feet east of the Project site, beyond the project-adjacent parking lot. Educational institutions in the general vicinity of the site

- Ellwood Elementary School, 7686 Hollister Ave, 340 feet east
- Brandon Elementary School, 195 Brandon Dr, 0.5 miles northeast
- Dos Pueblos High School, 7266 Alameda Ave, 1.1 miles northeast
- Goleta Valley Junior High School, 6100 Stow Canyon Rd, 3.7 miles northeast

5.15.1.4. Parks

The City of Goleta manages approximately 550 acres of parks and open space. The city's park system includes 9 neighborhood parks, 5 community parks, 3 mini parks, 9 neighborhood open spaces, 6 regional open spaces, and 1 community center (City of Goleta, 2025c). The parks and open space nearest the Project are:

- Ellwood Mesa Open Space and Sperling Preserve, 7729 Hollister Avenue, 0.1 miles south
- Goleta Butterfly Grove, 7801 Hollister Avenue, 0.6 miles southeast
- Winchester Park, Calle Real & Bradford Dr, 0.3 miles northeast
- San Miguel Open Space, Rio Vista Drive, 0.6 miles northwest
- Winchester II Park, Calle Real & Jenna Dr, 0.3 miles north

5.15.1.5. Hospitals

The following hospitals are closest to the site:

- Cottage Urgent Care, 5652 Calle Real, 4.4 miles east
- Goleta Valley Cottage Hospital, 351 South Patterson Avenue, 5.0 miles east

5.15.2. Regulatory Background

This section includes a description of the public services regulatory framework. There are no federal regulations associated with public services that are relevant to the proposed Project.

State

2010 Strategic Fire Plan for California. The 2010 Strategic Fire Plan for California was developed in coordination with the State Board of Forestry and Fire Protection and CAL FIRE to reduce and prevent the impacts of fire in California. Goal 6 of the Plan sets objectives to determine the level of suppression resources (staffing and equipment) needed to protect private and public resources. Specific objectives include, but are not limited to, maintaining an initial attack policy which prioritizes life, property, and natural resources; determining suppression resources allocation criteria; analyzing appropriate staffing levels and equipment needs in relation to the current and future conditions; increasing the number of CAL FIRE crews for fighting wildfires and other emergency response activities; maintaining cooperative agreements with local, state, and federal partners; and implementing new technologies to improve firefighter safety, where available (State Board of Forestry and Fire Protection). The standards outlined are applicable to the SBCFD serving the City of Goleta.

Local

City of Goleta General Plan Safety Element. The purpose of the City's public services policies is to maintain the safety and security that is essential and integral to the quality of life in the City. The following policy in the General Plan Safety Element generally relates to the proposed Project (City of Goleta, 2006):

Policy SE 1: Safety in General.

Objective: To avoid siting of development or land use activities in hazardous areas, and where this is not feasible, to ensure that adequate mitigation measures are incorporated into the project design to reduce risks to acceptable levels.

Policy SE 1.1: Maintenance of Maps and Resources of Hazards

The City shall require that new development be located and designed to avoid areas of high hazard risk, including but not limited to floodplains, unstable slopes, and high fire hazard areas. Where avoidance is not feasible, development shall incorporate mitigation measures to reduce risks to acceptable levels.

5.15.3. Environmental Impacts and Mitigation Measures

Thresholds of Significance

A significant impact on public services would be expected to occur if the proposed Project resulted in any of the impacts noted in the CEQA Appendix G checklist. In addition, 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) includes thresholds of significance for potential impacts on area schools. Specifically, under these thresholds, any project that would result in enough students to generate the need for an additional classroom using current State standards would be considered to result in a significant impact on area schools.

The City's adopted Environmental Thresholds and Guidelines Manual notes current State standards are: Grades K-2, 20 students per classroom; Grades 3 -8, 29 students per classroom; and Grades 9 – 12, 28 students per classroom. However, the State of California classroom size standards are as follows: average class sizes of 31 (not to exceed 33) for kindergarten, 30 (not to exceed 32) for Grades 1 – 3), and 29.9 (or the district's average number of students per teacher in 1964, whichever is greater) for Grades 4 – 8.

Impact Analysis

(a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:

i. Fire Protection

LESS THAN SIGNIFICANT IMPACT. The proposed Project would not require fire protection services during construction or operation and maintenance except in an emergency. The Project site would be served by the SBCFD, which aims to arrive within 4 minutes or less for 90% of incidents. The proposed BESS facility would include redundant safety systems to prevent and mitigate potential hazards, such as integrated temperature, voltage, and current protection, and anti-islanding functionality that automatically shuts down the system during grid disturbances. Battery enclosures would feature gas igniters and overpressure vents to safely release flammable gases during thermal runaway events, reducing explosion risk. Safety measures would include both software and physical isolation controls. The Project Applicant would coordinate with the City of Goleta and Santa Barbara County Fire Department to implement fire prevention

systems and emergency protocols. 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. 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 1206 of the California Fire Code. The construction and operation of the proposed Project would not result in a need for additional fire protection facilities or affect response times or other service performance. The result would be a less than significant impact.

ii. Police Protection

LESS THAN SIGNIFICANT IMPACT. The proposed Project would not require police services during construction or operation and maintenance beyond routine patrols and response. As with fire services discussed in Item (a) above, the construction and operation of the proposed Project would not result in a need for additional police facilities or affect response times or other service performance criteria. The majority of construction-related activities would be located away from major emergency access routes and are not expected to interfere with emergency response times. The result would be a less than significant impact on police services.

iii. Schools

LESS THAN SIGNIFICANT IMPACT. The proposed Project would not result in an increase in population within the area. Construction of the Project would take place over approximately 8 months and would not require the relocation of workers' families to the City of Goleta. A discernable increase in families or in school-age children would not be expected as a result of the short-term construction activities and any workers who might temporarily migrate to the area. The Project would not result in an increase in students, and therefore the Project would not generate the need for an additional classroom under current State standards.

After construction, Scale Microgrids, LLC's current operations and maintenance team would conduct equipment maintenance of the Project that would primarily involve technician inspections and general site upkeep. Dispatch would be managed remotely from a regional control center. After commissioning, qualified technicians would perform routine inspections and maintenance to ensure safe, reliable BESS operation over the Project's lifespan. There would be no additional workers as a result of this Project. Therefore, the Project would not increase the population in a way that would cause the need for expanded schools. The result would be a less than significant impact.

iv. Parks

NO IMPACT. The proposed Project would not increase the region's population. Construction of the Project would take place over 8 months and would require only a small construction workforce on any given day. While it is possible that workers traveling to the area may use existing public services or amenities such as parks, the potential increase in use and demand would be minimal and temporary and would not contribute substantially to the physical deterioration of existing facilities. Consequently, the Project would not increase any long-term demands on existing parks in the area surrounding the Project site, and no new or expanded park facilities would be required because of the proposed Project.

v. Other Public Facilities

NO IMPACT. The proposed Project would not increase population and would not affect other governmental services or public facilities that would lead to the requirement of new or expanded facilities to be developed. Therefore, no impact on other public facilities is expected.

5.15.3.1. Impact Conclusions and Mitigation Measures

The proposed Project would not result in significant impacts to public services and no mitigation measures are recommended.

5.16. Recreation

RECREATION		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
(b)	Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒

Significance criteria established by CEQA Guidelines, Appendix G.

5.16.1. Setting

There are a total of 33 parks, including one community center, managed by the City of Goleta (City of Goleta, 2025). Three parks, and one open space preserve are located within approximately one mile of the Project:

- Ellwood Mesa Open Space & Sperling Preserve, 7729 Hollister Avenue, 550 feet south
- Goleta Butterfly Grove, 7801 Hollister Avenue, 0.6 mile south
- Winchester Park, Calle Real & Bradford Dr, 0.3 mile northeast
- Winchester II Park, Calle Real & Jenna Dr, 0.3 mile north

In addition to these, there are two parks within Goleta's city limits that are not managed by the City:

- Girsh Park, Phelps Road behind the Camino Real Marketplace, 1.3 miles southeast.
- Goleta Beach Park, southern terminus of Sandpit Road, 3.7 miles southeast.

The closest residents live approximately 50 feet southeast of the Project at the Mariposa at Ellwood Shores elder care facility, as well as residents living in the single-family residential neighborhood 320 feet due west of the site, just beyond the Project-adjacent SCE substation and Las Amas Road. In general, each residential area in the City of Goleta contains a neighborhood or mini "pocket" park, located within 0.33 to 0.5 mile, to ensure that almost all residents live within close proximity to green spaces (City of Goleta, 2006). According to Figure 3-2 *Park And Recreation Plan Map* in the General Plan, the Project area is not in a location that is within an existing or planned future park, recreation, or open space location (City of Goleta, 2009).

5.16.2. Regulatory Background

This section includes a description of the recreation regulatory framework. There are no federal or State regulations associated with recreation that are relevant to the proposed Project.

City of Goleta General Plan Open Space Element. The objective of the city's public facilities and services policies is to maintain a high quality of life and livability in the City of Goleta. The following policies in the General Plan Open Space Element generally relate to the proposed Project (City of Goleta, 2006):

Policy OS 6: Public Park System Plan [GP]

Objective: To develop a well-maintained, interconnected system of multi-functional parks, recreation facilities and public open spaces that will meet the needs of existing and future residents and employees and that are attractive, safe, and accessible to all segments of the city's population, and supportive of established neighborhoods.

OS 6.3 Mini or “Pocket” Parks. [GP] A mini park is characterized by a relatively small size and specialized facilities that serve a small local area and/or specific segment of the population, such as children or senior citizens. The following standards shall apply to mini or pocket parks:

- a. The typical service area shall be a radius of 0.33 mile.
- b. The typical size shall be 1 acre or less.
- c. Mini parks should be located in close proximity to housing and/or other activity centers in the immediate neighborhood to provide accessibility and visibility.
- d. Typical facilities provided in mini parks may include children’s play areas and equipment, exercise and fitness areas, outdoor seating and picnic areas, and plazas.

OS 6.4 Neighborhood Parks. [GP] Neighborhood parks provide the nearby residential neighborhood with active recreational activities for a variety of age groups. The following standards shall apply to neighborhood parks:

- a. The typical service area radius shall be 0.5 mile.
- b. The typical size shall be less than 10 acres.
- c. Neighborhood parks should be easily accessible to the surrounding neighborhood population through safe pedestrian and bicycle access. Neighborhood parks do not generally require onsite parking, although a limited amount of parking may be provided.

5.16.3. Environmental Impacts and Mitigation Measures

Thresholds of Significance

A significant impact on recreation would be expected to occur if the proposed Project resulted in any of the impacts in the CEQA Appendix G checklist. There are no additional thresholds defined 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 increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

NO IMPACT. The proposed Project does not include development of new residential or commercial developments that would increase population and increase the demand for parks. The Project would use the site for a BESS to supply stored energy to the Southern California Edison (SCE) grid. Construction would take place over an 8-month period and would require only a small workforce on any given day. While some workers may use nearby park facilities during Project construction, increased use would be minimal and temporary and would not contribute substantially to the physical deterioration of existing facilities. Therefore, there would be no impact.

(b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

NO IMPACT. The proposed Project does not include recreational facilities, nor does it require the construction of new or expanded parks or recreational facilities that could create an adverse physical effect on the environment. There would be no impact.

5.16.3.1. Impact Conclusions and Mitigation Measures

There would be no impacts and thus, no mitigation measures are recommended.

5.17. Transportation

TRANSPORTATION		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
(a)	Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☒	☐	☐
(b)	Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?	☐	☐	☒	☐
(c)	Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☒	☐	☐
(d)	Result in inadequate emergency access?	☐	☒	☐	☐

Significance criteria established by CEQA Guidelines, Appendix G.

5.17.1. Setting

The proposed Project would use local roadways to access the site during construction and operation. Baseline conditions of regional and local roadways likely used to access the proposed Project site, as well as work locations and those temporarily affected by proposed Project construction activities are discussed below.

Highways

US 101 could be used to access the Project vicinity. Freeways in Goleta are typically designed to serve regional traffic with no “at grade” crossings and controlled access (City of Goleta 2025). The section of US 101 that passes through the City of Goleta is a 4- to 6-lane roadway (2 to 3 lanes per direction) that is a major regional and interregional transportation corridor along the California Central Coast. US 101 in Santa Barbara County is the primary arterial route passing east-west through Goleta and includes interchanges at key arterials such as Fairview Avenue, Los Carneros Road, Storke Road/Glen Annie Road, and Cathedral Oaks Road. Freeways in the city are controlled and managed by Caltrans.

Local Roads

There are two access points to the Project: Viajero Drive and Las Armas Road. The Project is directly accessed at the southeast corner of the Project site, from Viajero Drive, a two-lane local surface road with a 25-mph speed limit. The Las Armas access point is in the southwest corner of the Project site. Las Armas Road accesses the Ellwood Generation Station main gate, which would then allow access to the Project via a proposed private access easement within the EGS parking area.

Both Viajero Drive and Las Armas Road intersect with Hollister Avenue approximately 430 feet south of the Project site. This segment of Hollister Avenue is a 4-lane Principal Arterial, with a turning lane in the middle and a 45-mph speed limit. A Principal Arterial is a continuous route that carries traffic between various neighborhoods and communities, providing access to major traffic generators such as shopping malls or employment centers.

Access Routes

Local travel routes used to access the Project site include US 101, Principal Arterial Streets, and Local Streets. Traffic from the north and west would exit US 101 at Cathedral Oaks Road and proceed 250 feet west to Hollister Avenue before travelling east for approximately 0.4 mile on Hollister Avenue to the site. Highway traffic from the south and east would exit at Storke Road/Glen Annie Road and proceed south

approximately 0.3 mile to Hollister Avenue, where traffic would turn west for 1.6 miles to the site. The roadway segment of Cathedral Oaks Road, north of the US 101 interchange, was projected in the 2006 *General Plan Transportation Element* to have an average daily traffic (ADT) volume of 2,300 vehicles while the segment of Storke Road, south of the US 101 interchange was projected to accommodate an ADT of 45,700 vehicles.

The Local Streets serving the Project site would be Viajero Drive and Las Armas Road. Local Streets in Goleta, or Collector Streets, are primary residential streets designed to connect streets of a higher classification (carrying more traffic) and designed to have a minimum interference of traffic from driveways.

Roadways Disrupted by Project Construction

Construction of the proposed Project could result in a temporary disruption to roadways in the Project vicinity during delivery of large equipment or materials. The main roads that may require temporary lane closures and/or escort vehicles would be Viajero Drive and Las Armas Road, both local roads used to access the site, as well as Hollister Avenue.

Mass Transit

Bus. The Santa Barbara Metropolitan Transit District (MTD) provides public bus service throughout Goleta and the South Coast region. While Goleta's suburban, low-density development pattern poses challenges for transit efficiency, the presence of major employment centers along the Hollister Corridor and at UCSB supports future transit opportunities. Limited funding and the lack of direct City representation on MTD's governing board (as of 2005) have constrained service expansion. Regional commuter services from Ventura County and northern Santa Barbara County supplement local routes, but as of 2005, transit remained less competitive than the automobile in terms of convenience and accessibility for many users. MTD bus route number 25 is located near the Project site, traversing along Hollister Avenue, with three bus stops within approximately one-half mile (MTD, 2025).

Route 25 travels on Hollister Avenue, south of the Project site. The following three bus stops are near the Project and could be affected:

- East of the intersection of Hollister Avenue and Viajero Drive
- East of the intersection of Hollister Avenue and Cathedral Oaks Road
- East of the intersection of Hollister Avenue and Pebble Beach Drive

Passenger Rail. Passenger rail service in Goleta is currently limited to Amtrak and Caltrans-supported routes operating along the corridor between San Diego and San Luis Obispo using UPRR tracks that parallel the northern boundary of the Project site. The only rail facility in Goleta is a passenger platform located at La Patera Lane. While regional agencies have considered the potential for commuter rail service between Goleta and Ventura County, no formal commitments or actions had been taken as of 2005 (City of Goleta, 2006).

Rail (Freight)

The existing UPRR rail line accommodates both freight and Amtrak passenger services (City of Goleta, 2006). UPRR operates freight services through Goleta. This route, originally completed by the Southern Pacific Railroad in 1900 and later merged into Union Pacific in 1996, serves as a key freight artery connecting Southern California to the Central Coast and beyond. UPRR uses this line primarily for long-haul freight movements. The freight operations through Goleta are integral to regional logistics, supporting industries that rely on rail transport for goods movement. However, the line's proximity to the coastline makes it susceptible to environmental challenges, such as erosion and sea-level rise, which can impact service reliability (South Coast Railroad Museum, 2025; Gillman, 2023).

Bicycle

Existing bicycle facilities are part of City of Goleta bicycle and trail network. The network provides connections between residential neighborhoods, employment, recreation, education, and transit centers within the city to develop, maintain, and operate a balanced, safe, and efficient multimodal transportation system in the city to serve all persons, special-needs populations, and activities in the community (City of Goleta 2006). Bikeways are typically classified as Class I, II, or III facilities. A marked Class II intermediate bike lane is located along both sides of Hollister Avenue, just south of the Project site (City of Goleta, 2009).

Air Transportation

The Santa Barbara Airport is east of and adjacent to the City of Goleta within the City of Santa Barbara. The Airport is located approximately 2.2 miles east of the Project site. A private heliport, Sky High Helicopters, is located within the Santa Barbara Airport property.

5.17.2. Regulatory Background

State

California Vehicle Code (CVC). The CVC includes regulations pertaining to licensing, size, weight, and load of vehicles operated on highways; safe operation of vehicles; and the transportation of hazardous materials.

State CEQA Guidelines, Section 15064.3, Determining the Significance of Transportation Impacts. In response to Senate Bill 743 (Steinberg, 2013), this provision states that “vehicle miles traveled” (VMT) is the most appropriate measure of transportation impacts in the CEQA process. For transportation impacts under CEQA, VMT refers to the amount and distance of automobile travel attributable to a project. Other relevant considerations may include the effects of the Project on transit and non-motorized travel. Except for roadway capacity projects, a project’s effect on automobile delay would not constitute a significant environmental impact under CEQA. For instances where existing models or methods are not available to estimate the VMT for the particular Project being considered, a lead agency may analyze the Project’s VMT qualitatively. Such a qualitative analysis would evaluate factors such as the availability of transit, proximity to other destinations, etc. For many projects, a qualitative analysis of construction traffic may be appropriate [14 CCR 15064.3(b)(3)].

Local

City of Goleta General Plan. The objectives of the City’s General Plan transportation policies are to provide a safe, efficient, convenient, and integrated system to move people and goods and promote a reduction in the use of personal vehicles and VMT. The following policies in the General Plan generally relate to the proposed Project (City of Goleta, 2006):

Policy TE 13.1 Traffic Studies for Development Proposals. [GP] Future development in Goleta will cause added burdens on the transportation system. Traffic analyses and reports shall be required for development proposals which the City Engineer and Planning Director determine may have effects on the local street system, including but not limited to possible degradation of service levels, potential creation of safety hazards, potential adverse effects on local neighborhood streets, or other substantial transportation concerns. When required by the City, traffic studies shall be performed by a qualified transportation engineer under a contract with the City. The costs of the traffic study, including costs of city staff time, shall be the responsibility of the project applicant.

Policy PF 6.2 Undergrounding of Overhead Utilities. [GP] The City shall encourage the undergrounding of electrical power lines and other overhead utilities to the greatest extent practical, as follows:

- (a) The City shall pursue funding opportunities to underground existing overhead utilities, including SCE's dedicated underground funding ("Rule 20A/20B"), private funding, and assessment districts. The City shall establish priorities for locations for potential undergrounding projects.
- (b) To the extent practicable, all utilities shall be required to be placed underground in new development (see related VH 4.14).

5.17.3. Environmental Impacts and Mitigation Measures

Thresholds of Significance

Senate Bill 743 (Steinberg, 2013) required changes to the CEQA Guidelines regarding the analysis of transportation impacts. The California Office of Planning and Research proposed changes to the CEQA Guidelines that identify vehicle miles traveled (VMT) as the most appropriate metric to evaluate a project's transportation impacts. The California Natural Resources Agency adopted the recommended changes to the CEQA Guidelines and they became effective on December 28, 2018. With the adopted changes, automobile delay as measured by "level of service" and other similar metrics, will generally no longer constitute a significant environmental effect under CEQA. The changes to the way that CEQA evaluations of a project's traffic-related impacts are conducted become mandatory on July 1, 2020.

In December, 2018, the California Office of Planning and Research published a Technical Advisory on Evaluating Transportation Impacts in CEQA. The Technical Advisory contains recommendations regarding assessment of VMT, thresholds of significance, and mitigation measures. The Technical Advisory suggests that lead agencies may screen out VMT impacts using project size, maps, transit availability, and provision of affordable housing. In regard to screening thresholds for small projects, the Advisory states:

"Absent substantial evidence indicating that a project would generate a potentially significant level of VMT, or inconsistency with a Sustainable Communities Strategy (SCS) or general plan, projects that generate or attract fewer than 110 trips per day generally may be assumed to cause a less-than-significant transportation impact."

On July 7, 2020, pursuant to the requirements of SB 743, the City adopted Guidelines for the Implementation of Vehicle Miles Traveled, including Vehicle Miles Traveled Thresholds of Significance (Resolution 20-44). Consistent with SB 743 and OPR guidance, the City adopted the following standards and VMT Criteria:

VMT Baseline

Project impacts related to VMT shall be measured against the following criteria:

- Residential Projects: City Average VMT Per Capita
- Work Projects: City Average VMT Per Employee
- Other Projects: Net City VMT

Thresholds of Significance

The level of VMT which is considered a potentially significant impact is as follows:

- Residential and Work Projects: 15% Below City Average
- Other Projects: Net Increase in City VMT

The screening process outlined in the City's VMT guidelines was applied to analyze impacts related to VMT. The City screening criteria includes conditions for which projects, at the City's discretion, may not be required to conduct a VMT analysis and may be presumed to have a less than significant impact. The screening criteria include:

1. Small Project: Projects that generate less than 110 daily trips.
2. Map Based: High efficiency VMT zones for Residential and Work Base Projects.
3. Transit Proximity: Projects within ½ mile of transit stops with 15 minutes service, excluding areas within that ½ mile distance that cross Highway 101.
4. Affordable Housing: Housing projects with a minimum of 20% "low" or "very low" affordable housing unit proportion.
5. Locally Serving Retail: Retail projects of less than 10,000 square feet, where there is substantial evidence to support that the retail project is locally serving.

Impact Analysis

The thresholds discussed above are addressed in Checklist Item (b).

(a) Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

DURING CONSTRUCTION AND DECOMMISSIONING - LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED. Project construction would occur in a highly urbanized setting and could create impacts on the circulation system in the Project vicinity. Some lane closures and/or traffic controls may be required to allow for certain construction activities such as delivery of oversized equipment and material. Construction itself would occur entirely within the proposed Project site, aside from the connection point to EGS between the 66kv gen-tie line which would be installed underground and would not affect modes of transport. Decommissioning activities would be similar to construction activities, except materials would be exported from the site, rather than imported. Therefore, the impacts for decommissioning are similar to construction.

The bicycle facilities near the proposed Project would not be affected except during occasional lane closures, if needed. The proposed Project would not permanently remove bicycle lanes or conflict with alternative transportation routes.

While construction traffic would create impacts, these impacts would be localized, temporary in nature, and would not change long-term traffic loads or patterns. Mitigation measure MM T-1 is proposed to provide specificity regarding the requirements of a Construction Traffic Control Plan. The purpose of this plan would be to reduce potential impacts to the circulation system from the closure/disruption of travel lanes. With the incorporation of this mitigation, construction would not conflict with programs, policies, plans, or ordinances regarding public roadways, transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.

DURING OPERATIONS AND MAINTENANCE - NO IMPACT. The Project would generate on average one to two trips per week, with a maximum of up to 10 vehicle trips per week in the first year, which may be reduced following the first year of operations, that would involve routine, preventative, and emergency maintenance. No new staffing or substantial traffic impacts are anticipated. There would be no operational impacts.

Mitigation Measures for Construction Traffic

MM T-1 Construction Traffic Control Plan. Prior to the start of construction, Scale Microgrids, LLC shall prepare and submit a Construction Traffic Control Plan for review and approval to the City of Goleta (City) Planning Department for public roads and transportation facilities that would be directly affected by the construction activities and/or would require permits and approvals. Scale Microgrids, LLC shall submit the Construction Traffic Control Plan to

the City prior to construction.. The Construction Traffic Control Plan shall include, but not be limited to:

- Identification of any routes that would require lane closures or detours to accommodate material and equipment deliveries and methods to ensure safety.
- Avoidance of peak travel hours (8:00-10:00 a.m. and 4:00-6:00 p.m.) to the maximum extent feasible.
- Plans to coordinate in advance with emergency service providers to avoid restricting the movements of emergency vehicles. Police departments and fire departments shall be notified in advance by Scale Microgrids, LLC of the proposed locations, nature, timing, and duration of any roadway disruptions, and shall be advised of any access restrictions that could impact their effectiveness. At locations where roads will be blocked, provisions shall be ready at all times to accommodate emergency vehicles.
- Plans to coordinate in advance with property owners, if any, that may have limited access to properties.

(b) Would the project conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?

DURING CONSTRUCTION - LESS THAN SIGNIFICANT. CEQA Guidelines section 15064.3(b) concerns VMT as the measure of transportation impacts. As of July 1, 2020, CEQA requires use of VMT in the traffic analysis.

Construction of the proposed Project would occur over approximately 8 months and project-related traffic would consist of worker commutes and the movement of materials and equipment to and from the site. The vehicle trips associated with construction would cease upon completion of the construction period. As shown in Table 4-5 Vehicle Trips by Project Activity in Section 4.0 Project Description, the total peak number of vehicle trips during construction is estimated to be up to 16 roundtrips daily during the BESS Container and Conduit Installation period, which includes average daily worker and vendor truck trips. Construction personnel would commute to the work site at the beginning of the day and leave at the end of the day, and few people would travel to and from the site through the middle of the day.

VMT by personal vehicle trips and truck trips during construction would vary by origins and destinations, but they are assumed to come primarily from the local area and would be periodic and temporary, ceasing upon completion of the proposed Project. At this time, no known applicable VMT thresholds of significance for temporary construction trips that may indicate a significant impact are known. Therefore, while the proposed Project would include construction-related trips, they would be temporary and would cause a less than significant transportation impact under CEQA Guidelines section 15064.3(b).

DURING OPERATIONS AND MAINTENANCE - LESS THAN SIGNIFICANT. The Project would be unmanned, but would require routine inspection and periodic maintenance visits by existing Scale Microgrids, LLC personnel. As indicated in the Traffic, VMT, and Parking Study (Appendix N) conducted for the Project by Associated Transportation Engineers on June 28, 2024, and in accordance with OPR's Technical Advisory on Transportation (Senate Bill 743 – CEQA Guidelines section 15064.3[b]), the City of Goleta published a VMT Threshold Study that includes a requirement to analyze Project-related VMT impacts (Associated Transportation Engineers, 2024).

Consistent with the recommendations in the OPR Technical Advisory, Section 3.0 of the City of Goleta's VMT Thresholds Study establishes screening criteria for certain projects that are exempt from performing a detailed VMT analysis and may be presumed to have a less than significant VMT impact. The City's VMT screening criteria that apply to the Project are presented below:

3.3 Screening for Small Projects

"Projects that generate less than 110 automobile trips per day are presumed to have a less than significant VMT impact."

The Project would typically generate an average of one to two trips per week, with a maximum of 10 vehicle trips per week during the first year of BESS facility operation for equipment inspection and maintenance purposes. As discussed in the Project Operational Phase Traffic Analysis section of the Traffic, VMT, and Parking Study (Appendix N), the Project is forecast to generate approximately 1 to 2 trips per week during the first year of operation, and after the first year, the trips would be reduced to 1 to 2 trips per month. Even on the higher end of the estimation, a maximum of 10 trips per week, this is far below the Small Project screening criteria of 110 trips per day. The construction period would also generate fewer than 110 trips per day. The Project would therefore have a less-than-significant VMT impact.

(c) Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

DURING CONSTRUCTION - LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED. Heavy equipment operating adjacent to or within a road right-of-way could increase the risk of accidents. The Project involves movement of heavy equipment to and from the site but does not include work adjacent to or in roadways. Some instances of temporary lane or roadway closures may be required for delivery of oversized equipment or materials. Construction-related trucks would interact with other vehicles on the affected city streets and potentially create hazards. Potential conflicts also could occur between construction traffic and bicyclists and pedestrians, and potential short-term hazards could be associated with temporary lane closures, if required. Construction traffic-related impacts would be reduced with implementation of mitigation measure MM T-1 (Construction Traffic Control Plan) to ensure temporary lane closures and construction activities do not result in increased traffic hazards.

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 within or immediately adjacent to the Project site, at the entrance to the Project. With regard to roadway improvements, the Traffic, VMT, and Parking Study for the Project (Associated Transportation Engineers, 2024 - Appendix N) concluded that the new 24-foot wide driveway on the cul-de-sac at the end of Viajero Drive and the design of the Hollister/Viajero Drive intersection would accommodate construction traffic generated by the Project. With the incorporation of mitigation measure MM T-1, temporary impacts during construction would be less than significant.

DURING OPERATIONS AND MAINTENANCE - LESS THAN SIGNIFICANT. The Project facilities would not increase transportation hazards or be an incompatible use for the site. The Project would be similar in function to the surrounding land uses with similar ingress and egress to be provided. Maintenance of the proposed Project would require routine inspection and periodic maintenance visits. Access would be via the proposed driveway onto Viajero Drive and through the substation west of the site onto Las Armas Road. Therefore, the Project would not cause hazards or incompatible uses due to maintenance activities proximate to public roadways; no mitigation is required.

Mitigation Measures for Transportation Hazards

MM T-1 Construction Traffic Control Plan. [see full text under Item (a) above]

(d) Would the project result in inadequate emergency access?

DURING CONSTRUCTION - LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED. Construction of the proposed Project would cause a minor short-term delay in the local traffic movement in the immediate vicinity of the proposed Project if there were a temporary lane closure. During construction, the proposed Project would not increase traffic substantially as compared to the existing traffic volume and the capacity of the street system in the area. If oversize equipment or materials are delivered, at least one lane of travel

would remain open to accommodate roadway users (including emergency vehicles). To ensure temporary lane closures do not result in inadequate emergency vehicle movements or impede access to property, mitigation measure MM T-1 (Construction Traffic Control Plan) would require review and approval of a Project specific Construction Traffic Control Plan, which would include specific measures to address temporary closures/disruptions to travel lanes and plans to coordinate in advance with emergency service providers. With the incorporation of MM T-1, temporary impacts during construction would be less than significant.

DURING OPERATIONS AND MAINTENANCE - *LESS THAN SIGNIFICANT*. Once operational, the Project would have no impact on access or movement to emergency service providers. Occasional maintenance activities would be short-term in duration. Therefore, maintenance of the proposed Project would have a less than significant impact on emergency vehicle access and movements.

Mitigation Measures for Impacts to Emergency Access

MM T-1 Construction Traffic Control Plan. [see full text under Item (a) above]

5.17.3.1. Impact Conclusions and Mitigation Measures

The proposed Project would result in potentially significant impacts to transportation and emergency access. However, with implementation of mitigation measure T-1 (Construction Traffic Control Plan), impacts would be reduced to a less than significant level.

5.18. Tribal Cultural Resources

TRIBAL CULTURAL RESOURCES		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:					
i)	Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☐	☐	☒
ii)	A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

Significance criteria established by CEQA Guidelines, Appendix G.

5.18.1. Setting

Tribal Cultural Resources (TCRs) is a class of resources defined under Assembly Bill 52 (AB 52). TCRs include sites, features, places, cultural landscapes, and sacred places or objects that have cultural value or significance to a California Native American tribe (Tribe). To qualify as a TCR, the resource must either: (1) be listed on, or be eligible for listing on, the California Register of Historical Resources (CRHR) or other local historic register; or (2) constitute a resource that the lead agency, at its discretion and supported by substantial evidence, determines should be treated as a TCR (PRC §21074). AB 52 also states that tribal representatives are considered experts appropriate for providing substantial evidence regarding the locations, types, and significance of TCRs within their traditional and cultural affiliated geographic areas. Therefore, the identification and analysis of TCRs should involve government-to-government tribal consultation between the California Environmental Quality Act (CEQA) lead agency and interested tribal groups and/or tribal persons. (PRC § 21080.3.1(a)).

Additionally, Senate Bill 18 (SB 18) was enacted in 2004 to ensure that local governments (cities and counties) consult with California Native American tribes during the adoption or amendment of general plans or specific plans, or when designating open space. The goal is to protect tribal cultural places that may be affected by land use planning decisions. SB 18 applies to this project as the City would need to amend the General Plan in order for the Project to be built at the proposed location. Thus AB 52 and SB 18 were conducted concurrently for this Project.

5.18.1.1. Approach to Analysis of Tribal Cultural Resources

Information presented in this section was gathered through AB 52 and SB18 government-to-government consultation between the City of Goleta (City) and the California Native American Tribes that have cultural affiliations with the proposed Project site and that have requested to consult on the proposed Project and those that are within the City's jurisdiction and potentially affected by the General Plan Amendment. Supplementary information was gathered from the cultural resources literature and records search, cultural resources field survey, Native American Heritage Commission (NAHC) Sacred Lands File search, and ethnographic summary that was described in Section 5.5 (Cultural Resources).

Project Notification

The City submitted a local government tribal consultation request to the Native American Heritage Commission (NAHC) on November 13, 2024, and received a response on November 21, 2024 with a list of contacts. On December 18, 2024, the City contacted ten representatives from six tribal groups with ancestral and cultural connection to the Goleta area via email and certified mail. The tribal groups contacted were the Barbareño Band of Chumash Indians, Barbareño/Ventureño Band of Mission Indians, Chumash Council of Bakersfield, Coastal Band of the Chumash Nation, Northern Chumash Tribal Council, and the Santa Ynez Band of Chumash Indians. The consultation request letters included information about the Project, lead agency contact information, project location map, and a request for response within 90 days to accommodate the response timeline for SB 18.

AB 52 and SB 18 Tribal Consultation

Per AB52 and SB18, Tribal consultation letters were mailed via certified mail December 18 to the following tribes: Barbareño Band of Chumash Indians, Barbareño/Ventureño Band of Mission Indians, Chumash Council of Bakersfield, Coastal Band of the Chumash Nation, Northern Chumash Tribal Council, and the Santa Ynez Band of Chumash Indians. Consultation with the Santa Ynez Band of Chumash Indians was conducted on December 27, 2025. The consultation period ended on March 18, 2025

5.18.2. Regulatory Background

Local

City of Goleta. The City of Goleta Historic Preservation & Archaeological and Tribal Cultural regulations are codified as Chapters 17.33 and 17.43 of the Goleta Municipal Code (Ordinance No. 22-05) which established a Historic Preservation Commission (Section E) and a Historic Resources Inventory and seven local Landmark designations (Section G), as well as establishing standards for the protection of Archaeological Resources and Tribal Cultural Resources within the City of Goleta (Section H).

The definition adopted as part of Ordinance No. 22-05, defines an Archaeological Resource is “An artifact, object, or site constituting material remains of past human life or activities”; and Tribal Cultural Resources “...include Native American archaeological sites and area of natural landscape that have traditional cultural significance. Further, pursuant to Public Resources Code 21074(a), a resource that consists of unique or non-unique sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe that are:

- (a) Included in or determined to be eligible for inclusion in the California Register of Historical Resources (CRHR);
- (b) Included in a local register of historical resources; or
- (c) Determined by the lead agency, in its discretion and supported with substantial evidence, to be significant on the basis of criteria for listing in the CRHR after the lead agency takes into consideration the significance to the Tribe(s)” (City of Goleta Ordinance No. 22-05, 2022).

5.18.3. Environmental Impacts and Mitigation Measures

Thresholds of Significance

The Project would be considered to have a significant impact on Tribal Cultural Resources if it were to cause a substantial adverse change in the significance of a Tribal Cultural Resource as defined in the checklist above (Section 5.18). Additional thresholds are contained in the County of Santa Barbara’s *Environmental Thresholds and Guidelines Manual* (2021), which have been adopted by the City of Goleta. The City’s adopted thresholds indicate that a project would result in a significant impact on a cultural

resource if it results in the physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of the resource would be materially impaired. The physical demolition, destruction, relocation or alteration of a resource or its immediate surroundings would constitute a substantial adverse change to the resource; therefore, the City's adopted thresholds are considered in the following Impact Analysis.

Impact Analysis

(a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

- i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or**

NO IMPACT. There are no known Tribal Cultural Resources listed or eligible for listing in the state or local register of historical resources in the Project site. Therefore, no impacts would occur.

- ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.**

LESS THAN SIGNIFICANT IMPACT WITH MITIGATION INCORPORATED. Although there are no known Tribal Cultural Resources determined by the City to be a TCR located within the Project site, ground disturbance associated with the Project could result in unanticipated discoveries of resources that could be considered a TCR. If these resources were to be exposed or destroyed, it would constitute a significant impact. Implementation of Mitigation Measures (MM) C-1 through C-3 outlined in Section 5.5 (Cultural Resources) would reduce impacts to buried unknown resources to a less than significant level.

(b) Would the project result in the physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of such a resource would be materially impaired?

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED. Consultation efforts did not identify any known TCRs or traditional tribal cultural places (TTCP; under SB 18) in the Project site, thus no known resources would be impacted. However, ground-disturbing activity, such as grading, trenching, or excavations, has the potential to impact the significance of an unknown buried resource, should that resource be considered a TCR or TTCP. Implementation of MMs C-1, C-2, and C-3 outlined in Section 5.5 (Cultural Resources) would reduce impacts to unknown resources to a less than significant level.

5.18.3.1. Impact Conclusions and Mitigation Measures

The proposed Project would result in potentially significant impacts to tribal cultural resources. However, with implementation of mitigation measures C-1 through C-3 (see Section 5.5, Cultural Resources for full text), impacts would be reduced to a less than significant level.

5.19. Utilities and Service Systems

UTILITIES AND SERVICE SYSTEMS				
Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
(b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
(c) Result in a determination by the waste water treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
(d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
(e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	☒

Significance criteria established by CEQA Guidelines, Appendix G.

5.19.1. Setting

Utility and services system facilities associated with electricity, domestic (potable) water, stormwater, solid waste, communications, and natural gas are provided and maintained by a variety of local purveyors, including cities, counties, special districts, water agencies, and private companies. Table 5.19 1 lists utility providers in the City of Goleta

Table 5.19-1. Utility Providers

- **Natural gas** – Southern California Gas Company (SoCalGas)
- **Electricity** – Southern California Edison (SCE) & Central Coast Community Energy (3CE)
- **Water** – Goleta Water District
- **Wastewater** – Goleta West Sanitary District
- **Telephone** – Cox Communications
- **Solid Waste** – Santa Barbara County Resource Recovery and Waste Management Division & MarBorg Industries

Sources: City of Goleta, 2025a & 2025b; Marborg Industries, 2025

Water Supply

Potable water in Goleta is supplied by the Goleta Water District (GWD), which draws from multiple sources including Lake Cachuma, supplemented by imported State Water Project supplies, groundwater from the Goleta Groundwater Basin, and recycled water for non-potable uses such as irrigation. This diversified approach enables GWD to meet the needs of approximately 87,000 residents, businesses, and agricultural users, even during drought conditions (Goleta Water District, 2025).

Electricity

SCE is the primary electric utility for Goleta, delivering electricity to residential and commercial customers. As a subsidiary of Edison International, SCE serves approximately 15 million people across a 50,000-square-mile area in Southern California. (SCE, 2025).

3CE is a not-for-profit, locally controlled organization that provides clean and renewable electricity to residents and businesses in Goleta and other Central Coast communities. Commencing in October 2021, 3CE began sourcing electricity from renewable energy resources, offering customers competitively priced energy options. While 3CE manages the procurement of electricity, SCE continues to handle electricity delivery, billing, and maintenance of the electrical grid (City of Goleta, 2025a).

Natural Gas

SoCalGas is the primary natural gas provider for Goleta. As the nation's largest natural gas distribution utility, SoCalGas serves over 21 million consumers across more than 500 communities (SoCalGas, 2025a). The company operates the La Goleta Natural Gas Storage Facility, storing natural gas during periods of low demand and supplying it during peak usage times (SoCalGas, 2025b).

5.19.1.1. Service System

Sewage/Wastewater Treatment

Wastewater collection and treatment services in Goleta are provided by two agencies: the Goleta Sanitary District (GSD) and the Goleta West Sanitary District (GWSD). Customers in the area surrounding and including the Project site are serviced by GSD (GSD, 2025a).

The Goleta Sanitary District (GSD) serves as the regional wastewater treatment provider for the Goleta Valley, with a service area that includes the City of Goleta, the University of California, Santa Barbara (UCSB), Isla Vista, the Santa Barbara Airport, and adjacent unincorporated parts of Santa Barbara County. GSD operates a Wastewater Resource Recovery Facility with a treatment capacity of up to 9.8 million gallons per day (mgd), employing a three-stage process, comprised of the primary (physical separation), secondary (biological treatment), and tertiary (filtration and disinfection) stages. Treated effluent is either recycled for irrigation or discharged offshore. GSD also manages over 132 miles of sewer lines and offers resource recovery services, including biosolids reuse and energy generation (GSD, 2025b).

Solid Waste Disposal

Solid waste and recycling collection services in the City of Goleta are provided by MarBorg Industries. Under a franchise agreement with the City, MarBorg offers curbside services for residential customers, including collection of trash, recyclables, green waste, and food scraps. Marborg also offers recyclables and green waste collection (City of Goleta, 2025c). Additionally, the company operates a recycling center at 20 David Love Place in Goleta, located approximately 3.4 miles east of the Project site, accepting a range of materials such as e-waste, oil, paint, and textiles. Collected waste is processed at the Tajiguas Landfill and the County's ReSource Center, which includes a materials recovery facility and an anaerobic digestion facility, both co-located approximately 13.4 miles west of the site and outside the Goleta city limits (City of Goleta, 2025d). Table 5.19-2 lists the capacity of the Tajiguas Landfill.

Table 5.19-2. Landfill Capacities

Landfill Name	Total Capacity (cu.yd.)	Remaining Capacity (cu.yd.)	Remaining Capacity (percent)	Maximum Throughput (tons/day)
Tajiguas Resource Recovery & Sanitary Landfill (Cease operation estimated 2036)	23,300,000	1,944,330	8.3	1,500

Sources: CalRecycle, 2025a

5.19.2. Regulatory Background

This section includes a description of the utilities and public service systems regulatory framework.

Federal

Clean Water Act Section 402: National Pollutant Discharge Elimination System. Section 202 of the Clean Water Act (CWA) establishes the National Pollutant Discharge Elimination System (NPDES) permit program to regulate point source discharges of pollutants of Waters of the United States. Discharges or construction activities that disturb one or more acres, which includes the proposed Project, are regulated under the NPDES stormwater program and are required to obtain coverage permit under a NPDES Construction General Permit. The Construction General Permit establishes limits and other requirements such as the implementation of the Stormwater Pollution Prevention Plan, which would further specify best management practices to avoid or eliminate pollution discharge into the nation's waters. The State Water Resources Control Board (SWRCB) issues both general and individual permits under this program. The SWRCB delegates much of its NPDES authority to nine regional water quality control boards. The proposed Project's NPDES permits would be under jurisdiction of Region 3, the Central Coast Regional Water Quality Control Board (RWQCB) jurisdiction.

State

California Government Code – Protection of Underground Infrastructure. The responsibilities of California utility operators working in the vicinity of utilities are detailed in Section 1, Chapter 3.1, "Protection of Underground Infrastructure" (Article 2 of California Government Code §§4216-4216.9). This law requires that an excavator must contact a regional notification center at least two days prior to excavation of any subsurface installation. Any utility provider seeking to begin a project that may damage underground infrastructure can call Underground Service Alert, the regional notification center. Underground Service Alert will notify the utilities that may have buried lines within 1,000 feet of the Project. Representatives of the utilities are required to mark the specific location of their facilities within the work area prior to the start of project activities in the area. The code also requires excavators to probe and expose underground facilities by hand prior to using power equipment.

California Integrated Waste Management Act of 1989. Assembly Bill 939 codified the California Integrated Waste Management Act of 1989 in the Public Resources Code and established a hierarchy to help the California Integrated Waste Management Board (CIWMB) and local agencies implement three major priorities under the Integrated Waste Management Act: source reductions; recycling and composting; and environmentally safe transformation and land disposal. Waste diversion mandates are included under these priorities. The duties and responsibilities of the CIWMB have since been transferred to the California Department of Resources Recycling and Recovery (CalRecycle) after the abolishment of the CIWMB in 2010, but all other aspects of the Act remain unchanged.

The Act requires all local and county governments to adopt a waste reduction measure designed to manage and reduce the amount of solid waste sent to landfills. This Act established reduction goals of 25 percent by the year 1995 and 50 percent by the year 2000. Senate Bill 1016 (2007) streamlines the process of goal measurement related to Assembly Bill 939 by using a disposal-based indicator: the per capita disposal rate. The per capita disposal rate uses only two factors: the jurisdiction's population (employment can be considered in place of population in certain circumstances) and the jurisdiction's disposal as reported by disposal facilities. CalRecycle encourages reduction measures through the continued implementation of reduction measures, legislation, infrastructure, and support of local requirements for new developments to include areas for waste disposal and recycling on-site.

California Code of Regulations (Title 27). Title 27 (Environmental Protection) of the California Code of Regulations defines regulations and minimum standards for the treatment, storage, processing, and disposal of solid waste at disposal sites. The State Water Resources Control Board maintains and regulates compliance with Title 27 (Environmental Protection) of the California Code of Regulations by establishing waste and site classifications and waste management requirements for solid waste treatment, storage, or

disposal in landfills, surface impoundments, waste piles, and land treatment units. The compliance of the proposed Project would be enforced by the San Francisco RWQCB Region 2 and the California Department of Resources Recycling and Recovery (CalRecycle) (formerly the California Integrated Waste Management Board). Compost facilities are regulated under CCR Title 14, Division 7, Chapter 3.1 Section 17850 through 17895, by CalRecycle. Permit requests, Reports of Waste Discharge, and Reports and Disposal Site Information are submitted to the RWQCB and CalRecycle, and are used by the two agencies to review, permit, and monitor these facilities.

Local

Energy and Telecommunications Policies. The City of Goleta's General Plan includes several policies that support energy efficiency, water conservation, wastewater management, and infrastructure reliability. Collectively, the policies ensure that Goleta maintains high-quality utility and telecommunications infrastructure, promotes energy efficiency and renewable energy use, conserves water resources, and provides adequate wastewater treatment and sewer conveyance capacity for all new developments. The following policies in the General Plan generally relate to the proposed Project (City of Goleta, 2006):

- **Policy PF 6.2 Undergrounding of Overhead Utilities. [GP]** The City shall encourage the undergrounding of electrical power lines and other overhead utilities to the greatest extent practical, as follows:
 - a. The City shall pursue funding opportunities to underground existing overhead utilities, including SCE's dedicated underground funding ("Rule 20A/20B"), private funding, and assessment districts. The City shall establish priorities for locations for potential undergrounding projects.
 - b. To the extent practicable, all utilities shall be required to be placed underground in new development (see related VH 4.14).

Strategic Energy Plan: Commits to transitioning municipal facilities and the community-wide electricity supply to 100% renewable power by 2030, with at least 50% of municipal electricity use from renewable sources by 2025. This plan includes initiatives like joining 3CE and implementing building electrification and Electric Vehicle reach codes (City of Goleta, 2025e).

Water Supply and Conservation:

- **Policy PF 4.1 Water Facilities and Services. [GP/CP]:** The following criteria, standards, and procedures shall apply to water facilities and services:
 - d. Environmental reviews of new development shall evaluate the adequacy of water supply capacity to serve cumulative demand for all existing and planned development, including during extended periods of drought.
 - e. Water piping systems should be interconnected ("looped") wherever feasible to facilitate the reliable delivery of water to all locations within the city. The distribution system should be sized to provide minimum operating pressure of 45 pounds per square inch (psi) under normal conditions and 20 psi under emergency conditions such as fires.
 - f. Water supply and delivery systems shall be available in time to meet the demand created by new development or shall be assured through the use of bonds or other sureties. An assured water supply and delivery system shall be identified prior to discretionary approvals of projects to the satisfaction of the City. GWD or the project applicant may provide several alternative methods of documentation, including an unconditional "ability to serve" letter from the district.
 - g. The applicant and GWD shall demonstrate prior to issuance of final land use clearance that sufficient capacity shall be available to serve the development and all other cumulative projects within GWD's service area. This may be evidenced by an unconditional "will serve" letter or

contract for service from GWD. All required water infrastructure for a project shall either be in place at the time of approval of the land use clearance or shall be assured through the use of bonds, payment of fees, or other sureties to the City's and GWD's satisfaction.

Wastewater Management:

- **Policy PF 4.1 Water Facilities and Services. [GP/CP]:** The following criteria, standards, and procedures shall apply to water facilities and services:
 - i. The City shall encourage and actively promote long-term water conservation through water-conserving features in new development, including low water-use plumbing fixtures and drought-tolerant landscaping. The City also encourages the reclamation of treated wastewater and development of distribution facilities for reclaimed water to serve appropriate uses and locations.
- **Policy PF 4.2 Sewer Facilities and Services. [GP/CP]** The following criteria, standards, and procedures shall apply to sewer facilities and services:
 - a. The City shall monitor and compare the planned and potential consumption of the available and planned sewer capacity within the service areas of these utilities. If the available and planned capacity of sewerage services is not adequate to serve the planned and potential consumption, then the City shall take one or more of the following three actions in order of priority:
 - 1. Phase development within the City consistent with the Land Use Plan until such time that adequate resources can be identified to provide adequate supplies and improvements and urge other entities in the service areas to also reassess their plans.
 - 2. Reassess the City's Land Use Plan to reduce the demand for services to the degree necessary to match the supply and urge other entities in the service areas to also reassess their plans.
 - 3. Explore and support ways to reduce consumption in order to conserve available capacity and reduce the volume of discharges of treated effluent in ocean waters.
 - b. The City shall encourage effective and cost-efficient organization and delivery systems for provision of wastewater collection, treatment, and disposal services within its boundaries.
 - c. The City shall work with the GSD to ensure completion of a Capacity Management Alternatives Study to determine the scope of needed improvements for a higher level of treatment in order to improve the quality of effluent discharged by an outfall into ocean waters offshore from Goleta Beach Park. The City supports completion of this project as quickly as possible. The study should include a full evaluation of alternatives and costs. Alternatives should avoid construction of excess wastewater treatment capacity.
 - d. The City shall encourage recycling of treated wastewater to reduce water consumption and reduce ocean discharges of treated effluent.
 - e. Sewage collection and wastewater treatment capacity shall be available in time to meet the demand created by new development or shall be assured through the use of bonds or other sureties. The adequacy of sewerage facilities shall be identified prior to discretionary approvals of projects to the satisfaction of the City. The applicable sanitation district or project applicant may provide several alternative methods of documentation, including an unconditional "ability to serve" letter from the district.
 - f. The applicant and the applicable sanitation district shall demonstrate prior to issuance of final land use clearance that sufficient capacity and facilities shall be available to serve the development and all other cumulative projects within the

5.19.3. Environmental Impacts and Mitigation Measures

Thresholds of Significance

A significant impact would be expected to occur if the proposed Project resulted in any of the impacts noted in the above checklist. In addition, 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) provides the following applicable thresholds to determine whether significant utility impacts would occur:

Threshold USM-1. A project would result in a significant impact if the construction, demolition, or remodeling of a commercial, industrial, or residential development that is projected to create more than 350 tons of construction and demolition debris. For new construction projects, it is estimated that a 28,000 square foot commercial/industrial building would create this amount of waste.

Threshold USM-2. A project would result in a significant impact on the City's landfill capacity if it would generate more than 196 tons of solid waste per year, after a 50% reduction credit is given due to recycling efforts.

Threshold USM-3. Projects with a project-specific impact as identified above (196 tons/year or more) are also considered to have a cumulatively significant impact. Additionally, projects that would generate more than 40 tons or more tons per year (but less than 196 tons per year) of solid waste are considered to have a less than significant but adverse (i.e., a Class III) impact to regional solid waste and mitigation should be recommended.

Impact Analysis

Thresholds USM-1, USM-2, and USM-3 are addressed in Checklist Items (d) and (e).

(a) Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

LESS THAN SIGNIFICANT. The proposed Project would involve construction of a new BESS facility. Construction activities would generate a minimal demand for water or wastewater treatment and no demand for natural gas facilities. The Project would not require the relocation, expansion, or development of new utility systems beyond the Project itself. The electrical point of interconnection (POI) of the BESS with the electric grid would be within the existing SCE substation co-located with the EGS adjacent to the BESS site. A roughly 200-foot underground generation-tie line would run from the BESS transformer pad to the substation (see Figure 4-3). This design eliminates the need for new offsite power poles or conductors. The BESS would include built-in, redundant safety protections and automatic shutdown features, with ongoing system updates and safety communications provided by the supplier. The Project would not require expansion of any existing facilities or require additional facilities. During routine operation and maintenance the Project would be unmanned and would not create any need for new or expanded utilities or service systems.

Water, Wastewater Treatment or Storm Water Facilities. The proposed Project would generate minimal demand for water or wastewater treatment. A water truck would be on-site to support dust suppression during ground disturbing work. Water used for dust control would be dispersed onsite and would either evaporate or be absorbed into the ground; therefore, no wastewater generation is anticipated from this use.

Concrete would be required for foundations and any excess concrete from construction would be disposed of at an approved site away from the work area. Dewatering may be necessary if groundwater is encountered. Portable toilets would be provided for construction work crews and would be removed after construction is completed and these toilets will be maintained by a licensed sanitation contractor.

The proposed Project would not result in any increased stormwater flow entering stormwater drainage systems and therefore would not require, or result in the construction of, new stormwater drainage facilities or the expansion of existing facilities.

Upon completion of construction, the proposed Project would not generate any demand for water or wastewater treatment. There would be no sanitary sewer hookup at the site. Existing wastewater and water treatment facilities are adequate to accommodate the miniscule demand generated by the proposed Project. Thus, the Project would have less than significant impact that would not cause the need for the construction or expansion of water or wastewater treatment facilities or storm water drainage.

Electric Power, Natural Gas, or Telecommunications Facilities. No new natural gas or telecommunications facilities would be required in support of the Project. The existing electric power system at the EGS, including the existing substation, would remain in service during construction and commissioning of the Project. The Project would contribute to the stability of the City's power grid, by storing and discharging energy. These activities would not cause significant environmental effects, and impacts would be less than significant.

(b) Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

LESS THAN SIGNIFICANT. During construction limited amounts of water would be used for dust control and to make concrete for foundations. This would be a short-term need associated with construction and would end with the completion of construction. The volume of water required for dust control is not known. However, the amount of water for dust suppression during construction is considered to be nominal in comparison to available municipal water supply.

Water for construction activities would likely be sourced from GWD and delivered via truck as there are currently no wells onsite. The water may be collected from a metered connection to an existing hydrant located adjacent to the site entrance. Detailed design review may identify additional required improvements, such as new water meter and connections to the water and fire water main system at driveway entrances, and additional fire hydrants. Upon completion, the proposed Project would not generate any demand for water, unless there was a fire. Therefore, the proposed Project would have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry and multiple dry years, and impacts would be less than significant.

(c) Would the project result in a determination by the waste water treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

LESS THAN SIGNIFICANT. The proposed Project would generate minimal wastewater during construction. The proposed Project would provide portable toilets for construction workers and the waste would be disposed of through a treatment facility with adequate capacity. As discussed in Item (a) above, existing wastewater facilities would adequately accommodate the minor demand caused by Project construction while serving existing commitments. Therefore, this impact would be less than significant.

(d) Would the project generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

LESS THAN SIGNIFICANT. Construction debris and waste generated during construction of the Project would be staged onsite, then separated and recycled or disposed of at the nearest solid waste and recovery facility, the Tajiguas Landfill.

Total solid waste generated by construction of the proposed Project is anticipated to be minor compared to the capacity of local recycling infrastructure and existing landfill. The site is currently vacant, and the waste generated would be limited to construction materials and not include demolition debris. The waste

generated during construction would include concrete, aggregate, wood, and metal, along with the materials necessary to construct the BESS. The Tajiguas Landfill is not expected to close for at least a decade, and has a remaining capacity of 1,944,330 cubic yards.

The City's Threshold USM-1 states that a project would result in a significant impact if the construction, of the development is projected to create more than 350 tons of construction and demolition debris. For new construction projects, it is estimated that a 28,000 square foot commercial/industrial building would create this amount of waste. The proposed Project's BESS units and ancillary structures would occupy approximately 0.4 acres of the site, which equates to approximately 17,000 square feet. Although the proposed Project would not construct a typical building, this is below the threshold of significance for construction waste.

Additionally, the City has implemented a mandatory Construction and Demolition (C&D) Debris Recycling Program to divert at least 65% of C&D waste from landfill disposal in accordance with state law. In addition, diversion reporting is required after construction in accordance with the City of Goleta's Construction and Demolition Debris Recycling Program Waste Reduction and Recycling Guidance Document. The applicant will be required to substantiate how a 65% diversion factor was achieved during construction. Compliance with adopted Green Building Code requirements will reduce the project's short-term waste generation impacts to a less than significant level.

During operation, the proposed Project would be unmanned and would not generate notable quantities of solid waste that require landfill disposal. Occasionally individual batteries may need to be replaced, and the battery would be returned to the manufacturer for recycling and disposal.

During decommissioning, the entire BESS unit would be removed, and returned to the manufacturer's recycling facility, where recycling and disposal would take place. Therefore, the impact of solid waste disposal on local infrastructure and landfill capacity would be less than significant.

(e) Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

NO IMPACT. The California Integrated Waste Management Act of 1989, which emphasizes resource conservation through the reduction, recycling, and reuse of solid waste guide solid waste management requires localities conduct a Solid Waste Generation Study (SWGS) and develop a Source Reduction Recycling Element (SRRE). The proposed Project would operate in accordance with these applicable Solid Waste Management Policy Plans by recycling materials where feasible. As identified in Table 5.19-2, Landfill Capacities, the Tajiguas Resource Recovery & Sanitary Landfill serving the site has 1,944,330 cubic yards of available capacity to accommodate Project construction solid waste disposal needs. The Project is not anticipated to generate a substantial amount of waste during construction, when compared to the available capacity of the nearest landfill. A detailed Decommissioning Plan would be prepared prior to BESS facility installation, identifying the procedure for recycling and reclaiming much of the materials generated by the Project. Project solid waste disposal would not result in the need for new or expanded landfill facilities. Therefore, the proposed Project would comply with federal, State, and local management and reduction statutes and regulations related to solid waste. No impact would occur.

5.19.3.1. Impact Conclusions and Mitigation Measures

The proposed Project would result in less than significant impacts to utilities and service systems, and thus, no mitigation measures are required.

5.20. Wildfire

WILDFIRE	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
(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 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 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.

5.21. Mandatory Findings of Significance

MANDATORY FINDINGS OF SIGNIFICANCE	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
(b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	☐	☒	☐	☐
(c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

Significance criteria established by CEQA Guidelines, Appendix G.

(a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

LESS THAN SIGNIFICANT IMPACT WITH MITIGATION INCORPORATED. The proposed Project would be located in the central western area of the City of Goleta. This Project site is in a highly urbanized area. There is some existing vegetation at the site and minor clearing of vegetation and some of the existing trees would occur during site preparation.

As described in Section 5.4, Biological Resources, there are no listed special status plant species observed in the Project site, and none have a potential to be present. Additionally, there are no listed special status wildlife species observed within the Project site.

One species proposed for federal listing, monarch butterfly, and one species that is a candidate for listing, Crotch's bumble bee, and one CDFW species of special concern, western red bat, do have a potential to be present. Impacts to special-status plant and wildlife species would be avoided with the implementation of Mitigation Measures (MMs) BIO-1, BIO-2, and BIO-3. Impacts to Crotch's bumble bee would be avoided with the implementation of MM BIO-4. The Project is not expected to result in impacts on habitats that support sensitive species, although mitigation measures have been proposed to ensure impacts are avoided, including MM BIO-5. Implementation of MM BIO-6 would reduce or avoid any potential impacts to nesting birds.

Similarly, Section 5.5 (Cultural Resources) and Section 5.18 (Tribal Cultural Resources) show that the Project would have a less than significant impact to important examples of the major periods of California history or prehistory. The records search indicates that no prehistoric cultural resources have been previously identified in the Project site. However, as described in Section 5.5 (Cultural Resources) and Section 5.18 (Tribal Cultural Resources), the proposed Project could have an adverse effect on previously undiscovered cultural or tribal cultural resources, when ground disturbing activities are occurring. With implementation of mitigation measures MM C-1, MM C-2, and MM C-1 for unanticipated discoveries of archaeological and historical resources, human remains and/or paleontological resources, impacts would

be less than significant, and the Project would not eliminate important examples of major periods of California history or prehistory.

(b) Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)

LESS THAN SIGNIFICANT IMPACT WITH MITIGATION INCORPORATED. CEQA defines a cumulative impact as an effect that is created as a result of the combination of the proposed Project together with other projects (past, present, or future) causing related impacts. Cumulative impacts of a Project need to be evaluated when the Project’s incremental effect is cumulatively considerable and, therefore, potentially significant.

Four currently under construction and two planned projects were identified within 0.25 miles of the Greenbark 30 BESS site. The projects were reviewed to identify whether the Project could contribute to cumulatively significant impacts when evaluated in combination with these projects. The projects were identified from the Planning Department’s current projects’ list. These are considered potential cumulative projects whose impacts could combine with those of the Greenbark 30 BESS Project. They are:

- Ellwood Butterfly Habitat Management Plan Implementation – implement management program to restore Monarch aggregation sites, enhance biodiversity, and maintain public access, and other management plan activities
- Ellwood Tree Safety Emergency Permit and Ellwood North Restoration – emergency tree removal for safety reasons by habitat enhancements in monarch butterfly aggregation sites
- Beach Hazards Removal – removal of remnant oil and gas infrastructure hazards along City coastline
- PRC 421 Piers – plug and abandon 2 existing oil wells, remove piers, infrastructure, and access roadway
- Ellwood Mesa Coastal Trails and Habitat Restoration Project – improve 7.1 miles of trails, improve 3 drainage crossings, improve 2 beach access points, and 13 acres of habitat restoration
- Mini Storage – demolition of an existing park-and-ride facility (494 spaces) and development of new self-storage facility on an approximate 5.39-acre lot

As discussed in preceding Sections 5.1 through 5.21 any potential impacts of the proposed Project would occur during construction, with few, if any, operational effects. Because the construction-related impacts of the Project would be temporary and localized, they would have the potential to combine with similar impacts of other projects only if they occur at the same time and in close proximity. The cumulative temporary and localized impacts of the construction of the Greenbark 30 BESS Project are considered by issue area below. While actual construction periods often vary from those initially anticipated, it is possible that some of the six identified projects could overlap with the anticipated 2026-2027 beginning of construction at the Greenbark 30 BESS site. Additionally, applications for other unknown projects may occur and may overlap with the Greenbark 30 BESS construction period. Because the area is built out, any projects would be reconstruction or construction of replacement land uses on already occupied sites. Given the built-out nature of the Project vicinity and the capacity of existing thoroughfares, there would be no long-term impacts from the proposed Project that would have the potential to combine with impacts from the Projects listed.

Aesthetics. As described in Section 5.1, views to and from the Project site are limited by existing buildings and vegetation. The viewshed of the proposed Project is an urban setting and continued urbanization is the likely trend for the foreseeable future with little change in its overall visual character. The impacts from the construction of the Project would be minimal because the work would be temporary in nature. The proposed Project represents only a relatively minor incremental change in cumulative conditions

given the urban nature of the location. Therefore, the Project's visual effects are less than significant and are not considerable enough to represent a significant cumulative impact.

Agriculture and Forestry Resources. There is no agricultural activity at the site or any of the cumulative project sites. The Project would not contribute to cumulative impacts to agriculture and forestry resources.

Air Quality. Air emissions would occur during construction of the Greenbark 30 BESS. Emissions would include criteria air pollutants that could contribute to existing or projected violations of the ambient air quality standards for ozone and PM10. Other pollutants resulting from construction activities are accounted for in emissions inventories for regional air quality maintenance plans and would not impede attainment or maintenance of ambient air quality standards. Foundation excavation and other construction-related activities could potentially expose sensitive receptors to construction-related emissions, including emissions of fugitive dust and DPM, which could expose the receptors to increased health risk and hazards. These would occur only during construction and would be less than significant. Any potential adverse cumulative air quality impacts would be short-term (lasting for the duration of construction) and would not be cumulatively considerable; therefore, the cumulative impact would be less than significant. The operation and maintenance emissions (e.g., limited vehicle use) would be less than the emissions during construction activities and also less than the significance thresholds.

Concurrent construction of other projects in close proximity to the proposed Project would result in increased local air quality impacts for the duration of simultaneous construction activities. However, simultaneous construction projects would also need to comply with SBCAPCD rules and regulations regarding criteria pollutants. Any potential adverse cumulative air quality impacts would be short-term (lasting for the duration of construction) and would not be cumulatively considerable; therefore, the cumulative impact would be less than significant.

Biological Resources. There are no listed special status plant species observed in the Project site, and none have a potential to be present. Additionally, there are no listed special status wildlife species observed within the Project site. One species proposed for federal listing, monarch butterfly, and one species that is a candidate for listing, Crotch's bumble bee, and one CDFW species of special concern, western red bat, do have a potential to be present. Impacts to special-status plant and wildlife species would be avoided with the implementation of Mitigation Measures (MMs) BIO-1, BIO-2, and BIO-3. Impacts to Crotch's bumble bee would be avoided with the implementation of MM BIO-4.

There are two types of riparian habitat present within the proposed Project site, but neither are expected to be impacted. Impacts to riparian habitat and sensitive natural communities would be avoided with the implementation of MM BIO-5 by requiring avoidance and creation of a 50-foot buffer.

Within the proposed Project site, there are Wetlands and Waters of the State, as defined by the CCRWQCB. With implementation of MM BIO-6, impacts to State or federally protected wetlands would be avoided.

Although no bird nests were observed during the surveys conducted in support of the proposed Project, suitable nest sites are expected throughout the proposed Project site and adjacent open space, and many common bird species are expected to nest there. Implementation of MM BIO-7 would reduce or avoid any potential impacts to nesting birds. The proposed Project would not result in the removal of any protected trees.

The Project would not represent a significant contribution to cumulative impacts. Given the built-up nature of the City, other cumulative projects in the vicinity have limited biological resources. Impacts to biological resources during operation and maintenance of the BESS would be less than significant with implementation of mitigation, therefore, a less than significant contribution to cumulative impacts would occur.

Cultural Resources. There are no known historical or unique archaeological resources identified within the proposed Project site; however, previously unknown buried historical resources or human remains could be discovered and damaged, or destroyed, during ground disturbing work. Short-term construction activities and operation and maintenance activities would not significantly affect any unknown cultural or paleontological resources or human remains with the implementation of mitigation measures MM C-1 (Cultural Resources Awareness Training), MM C-2 (Inadvertent Discovery of Historical Resources, Unique Archaeological Resources or Tribal Cultural Resources), and MM C-3 (Treatment of Human Remains), as discussed in Section 5.5, Cultural Resources. No cultural resources would be affected during Project construction or during operation of the Project, and no contribution to cumulative impacts would occur.

Energy. The objectives of the proposed Project are to increase the reliability and flexibility of SVPs electrical grid and to help solve California's "duck curve" power production problem. The proposed Project would achieve these objectives by utilizing the BESS to store energy. Equipment used during construction would comply with mandated efficiency standards, and there would be no wasteful, inefficient, or unnecessary consumption of energy resources. The operation and maintenance activities would be minimal and would not involve wasteful, inefficient, or unnecessary consumption or use of energy resources. The energy being stored by the BESS would be delivered to the BESS from the mix of renewable and fossil fuel powered generation resources available at the time of charging. This energy would be discharged during periods of high demand, when fossil fuel resources are most likely to be called upon. As a result, the energy discharged by the BESS would be likely to displace the use of fossil fuel resources during periods of high demand. The proposed Project would not conflict with any state or local plan for prioritizing renewable energy or energy efficiency, and there would be no considerable contribution to a cumulative impact associated with energy.

Geology and Soils. As discussed in Section 5.7, the proposed Project The City is located would be located in a region prone to earthquakes and characterized by a moderate to high ground shaking hazard. Projects in the vicinity of the Greenbark 30 BESS Project would also be located in areas mapped as likely to experience strong ground shaking potentially combining to expose people or structures to potential significant cumulative impacts. All construction would be required to comply with building code standards that take into account effects of seismic events, which would ensure that Project design would reduce the potential for geologic and seismic hazards. The Project would not increase potential risks associated with seismic events or other geologic hazards. Short-term construction impacts to soils, including unstable soils, have the potential to occur; however, final geotechnical recommendations would reduce the impacts to a less than significant level and the proposed Project impacts are not considerable enough to represent a significant cumulative impact. Adherence to similar design and engineering standards, which are applicable to the identified cumulative projects, ensure that their cumulative impacts to geology and soils would also be less than significant.

There is a limited potential for paleontological resources to occur on the site. Mitigation measures MM C-1 (Cultural Resources Awareness Training) and MM C-2 (Inadvertent Discovery of Historical Resources, Unique Archaeological Resources or Tribal Cultural Resources) would ensure any potential impacts are less than significant and would not contribute to a cumulatively considerable impact.

Greenhouse Gas Emissions. Because the direct environmental effect of GHG emissions is to influence global climate change, GHG emissions are by their nature inherently a cumulative concern with a cumulatively global scope. Project-specific GHG emissions would occur from the burning of fuels required by construction equipment and vehicles during construction activities. Primary GHG emissions during construction are associated with CO₂ from the combustion of gasoline and diesel fuel in equipment and vehicles. CH₄ and N₂O are also emitted from fuel combustion but at rates of less than 1 percent of the mass of CO₂ combustion emissions. Construction-related emissions would be distributed over 8 months.

These estimated levels would not exceed the threshold level of 10,000 MTCO₂e per year for annual mandatory reporting of GHGs.

GHG emissions from operation and maintenance would be minimal, as the Greenbark 30 BESS would require only infrequent maintenance. The minor quantity of GHG emissions created during construction and for operation and maintenance would not be a cumulatively considerable impact.

Hazards and Hazardous Materials. The use of hazardous materials for the Project would be minimal during construction and operation. Hazardous materials would be stored and used in compliance with applicable regulations. The Project would not result in an increase in usage of hazardous materials. Impacts from routine use, transportation, disposal, and accidental spillage of hazardous materials would be reduced to a less than significant level with implementation of mitigation measure MM HM-1 (Hazardous Substance Control and Emergency Response) discussed in Section 5.9, Hazards and Hazardous Materials; no contribution to cumulative impacts would occur.

Hydrology and Water Quality. The Project site is covered primarily with impervious surfaces. The proposed Project would require minimal water for dust control and concrete during construction. Dewatering during foundation excavation for poles is possible, but not anticipated. In the event that dewatering is necessary, the water would be pumped out and treated and encountered groundwater would be tested to meet requirements set by the Regional Water Quality Control Board (RWQCB). Based on the hydrological analysis, a site-specific retention basin has been designed to capture excess stormwater runoff during long-term operations. Implementation of the condition of approval GEO2 (Stormwater Pollution Prevention Plan (SWPPP) Development and Implementation) and MM HM-1 (Hazardous Substance Control and Emergency Response) would ensure that erosion, sedimentation, or an accidental spill would not significantly affect water quality. With implementation of this mitigation, the Project's hydrology and water quality impacts are less than significant and are not considerable enough to represent a significant cumulative impact.

Land Use. The proposed Project, upon approval of the General Plan Amendment to reclassify the site as Office and Institutional (I-OI) and a rezone of the parcel from CG to Office and Institutional (OI), would be consistent with local zoning. The proposed Project would construct a compatible use within an existing site. In addition, the proposed Project, as well as the cumulative projects, are required to minimize any impacts to state and federally listed species and/or habitats through compliance with CEQA, the federal ESA, the CESA, and/or applicable local habitat conservation plans. The proposed Project would, therefore, not conflict with applicable land use policies and regulations and would not contribute to cumulative impacts to land use.

Mineral Resources. No commercial mineral resources are known to exist within the proposed Project site or vicinity. Therefore, the proposed Project would not result in the loss of availability of a known mineral resource. The Project would not contribute to potential cumulative impacts that may result in the loss of mineral resources.

Noise. The proposed Project is not expected to contribute to a long-term cumulative impact on ambient noise levels in the area. Noise from construction activities would be audible to nearby office buildings, schools, and residences but construction would be limited to daytime hours and would be short-term. There are several sensitive receptors located within a half mile of the site, including the adjacent elder care facility to the southeast, a residential community to the north beyond 101, a residential neighborhood to the west beyond the substation, and a school to the east beyond the Project-adjacent parking lot. It is assumed that the cumulative projects would also be constructed during daytime.

Construction of the proposed Project would result in temporary increases in ambient noise levels experienced by the nearby noise-sensitive receptors, with the closest being the elder care facility approximately 260 feet to the southeast, measured from the center of the proposed Project site, to the nearest property

line at the elder care facility. Although modeled levels are expected to remain below the applicable thresholds at the nearest sensitive receptor (see Table 5.13-5, Average Construction-Generated Noise Levels (dBA) Experienced at Nearest Residence), a planned project immediately adjacent to the site may be constructed during the same timeframe (mini storage facility adjacent to the Project's southern boundary). The potential for overlapping construction could result in cumulatively considerable increases in noise levels.

Without coordination or additional controls, the cumulative impact could be significant. Implementation of Mitigation Measure MM NOI-CUM-1 would reduce potential cumulative construction noise impacts to a less-than-significant level:

MM NOI-CUM-1 Concurrent Construction Coordination Plan. Prior to any ground-disturbing activities, the Project Applicant shall coordinate with the adjacent project proponent(s) to identify overlapping construction periods. If concurrent activities are scheduled within 500 feet of a shared property line, the applicants shall develop a construction noise reduction plan in consultation with the City. The plan may include but is not limited to: staggered work schedules, use of quieter equipment, temporary sound barriers, and notification to nearby sensitive receptors.

Population and Housing. The proposed Project would not result in impacts on population and housing. During its construction, the Project would provide short-term jobs for a small workforce. Construction workers would be contracted workers from the region. These jobs are not anticipated to result in workers relocating to the area. The Project would not displace any existing housing or people. The proposed Project, combined with the cumulative projects will have the potential to increase the population in the area due to increased job or housing opportunities. The proposed Project itself can facilitate future planned growth by ensuring a reliable and flexible electricity grid in the area. While the development of these properties may induce some population growth, this has already been accounted for through the General Plan for the City of Goleta. The Greenbark 30 BESS Project is proposed to increase system reliability and to serve planned growth in the area. The project's population and housing impacts would be less than significant and are not considerable enough to represent a significant cumulative impact.

Public Services. The proposed Project would not interrupt fire or police protection services, schools, access to public parks, or other public facilities nor would it require the construction of new public service facilities. The completion of the Projects in the vicinity may have the potential to also increase the demand for public services and public facilities, including schools, parks, and fire and police protection. However, impacts from the Greenbark 30 BESS Project on public services would be incremental and would not contribute to a cumulatively significant impact.

Recreation. Although some workers may use nearby park facilities during Project construction; increased use would be minimal and temporary and would not contribute substantially to the physical deterioration of existing facilities. The cumulative projects also have the potential to increase use of park facilities, but the increased use would also be minimal. The Project would have less than significant effects on recreation and would not contribute to cumulative effects associated with other projects.

Transportation and Traffic. Construction of the proposed Project would have the potential for temporary impacts on traffic volumes, road hazards, and emergency access. Use of local roads for the transport of construction equipment and construction personnel would increase traffic slightly but would be temporary and short-term and would not exceed existing capacities. Impacts due to traffic and temporary lane closures as a result of the construction of the proposed Project would be reduced to a less than significant level with implementation of mitigation measure MM T 1 (Construction Traffic Control Plan) discussed in Section 5.17, Transportation and Traffic. Impacts from the proposed Project, combined with construction of the cumulative projects would have the potential to cumulatively impact transportation

and traffic in the surrounding area; however, the construction schedules of the Projects and that of the proposed Project would be variable. The potential for the planned and current projects in the vicinity to require lane closures simultaneously would be a remote possibility and would be limited in duration and location. Adherence to mitigation measure MM T 1 (Construction Traffic Control Plan) would ensure that the proposed Project's cumulative impacts to traffic and transportation would be incremental, short-term, and less than significant.

Tribal Cultural Resources. There are no known Tribal Cultural Resources (TCRs) listed in, or are known to be eligible for listing in, the California Register of Historical Resources (CRHR) or local register of historical resources within the proposed Project site or surrounding area. However, it is possible that previously unidentified TCRs that may be eligible for inclusion in the CRHR or local registers could be discovered and damaged, or destroyed, during ground disturbance, which would constitute a significant impact absent mitigation. Implementation of mitigation measures MM C-1 through C-3 outlined in Section 5.5, Cultural Resources, and discussed in Section 5.18 (Tribal Cultural Resources), would ensure evaluation and protection of unanticipated TCR discoveries. Adherence to this mitigation measure would ensure that no tribal cultural resources would be affected during Project construction or during operation of the Project, and no contribution to cumulative impacts would occur.

Utilities and Service Systems. The construction of the proposed Project would temporarily require a minimal water supply and would potentially generate wastewater that would be appropriately treated. Construction would require the disposal of a less than significant amount of all types of waste. No expanded utility facilities or services would be needed for the Project and use and disposal of all water and waste products would comply with all applicable laws and regulations. Operation and maintenance of the Greenbark 30 BESS Project would not require extensive water consumption, as stated in Section 5.19. Therefore, a less than significant contribution to cumulative impacts to utilities and service systems would occur.

Wildfire. The construction, operation, and decommissioning of the proposed Project has the potential to conflict with an emergency response plan, or exacerbate wildfire risks in the event of an upset. The proposed Project would follow all rules and regulations set for BESS related to fire safety. The cumulative projects would not have construction traffic overlapping with the proposed Project, as construction schedules vary, reducing the risk for impeding an emergency response. With implementation of mitigation measures MM T-1 (Construction Traffic Control Plan) and MM HM-1 (Hazardous Substance Control and Emergency Response), a less than significant contribution to cumulative impacts would occur.

(c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

LESS THAN SIGNIFICANT IMPACT. The proposed Project would not substantially adversely affect human beings directly or indirectly. The Initial Study identified no environmental effects that would cause substantial adverse effects on human beings. Adverse effects would be mitigated by implementation of mitigation measures and, in most instances, would be short-term construction impacts. Each type of impact with the potential to cause substantial adverse effects on human beings has been evaluated, and this Initial Study concludes that all of these potential impacts are either less than significant or can be mitigated to a less than significant level with the implementation of measures presented herein. (See Section 6, Mitigation Monitoring and Reporting Program, for a complete listing of the mitigation measures.) Therefore, the proposed Project does not involve any activities, either during construction or operation, which would cause significant adverse effects on human beings that cannot be readily mitigated to a less than significant level. The proposed operation and maintenance activities would be similar to current operation and maintenance practices for similar facilities, which have minimal impacts on human beings. The potential beneficial effects of the Project include improving the reliability and flexibility of the existing transmission system in the City of Goleta.

5.21.1.1. Impact Conclusions and Mitigation Measures

The proposed Project would not result in a significant contribution to cumulative impacts, other than one potentially significant impact to noise resources. However, with implementation of mitigation measure NOI-CUM-1 (Concurrent Construction Coordination Plan), impacts would be reduced to a less than significant level.

6. MITIGATION MONITORING PLAN

This Mitigation Monitoring and Reporting Program (MMRP) will be used by the City of Goleta and the Applicant to ensure that the mitigation measures adopted as a condition of project approval are implemented. The MMRP is consistent with CEQA Guidelines (Sections 15074(d), 15091(d), and 15097) for the implementation of mitigation.

The City of Goleta is the CEQA Lead Agency. In that role, if the proposed Project is approved, the City is responsible for ensuring that monitoring and reporting on required mitigation occurs. As the Applicant and Project proponent, Scale Microgrids, LLC would be responsible for implementing all applicable measures, including adopted mitigation measures and conditions of project approval, as well as conditions imposed in any permits or regulations administered by other responsible agencies. Additionally, the City will be responsible for ensuring that construction personnel understand their responsibility to adhere to the MMRP requirements and other contractual requirements related to the implementation of mitigation.

Table 6-1. Mitigation Monitoring Plan

Impact Category	Mitigation Measure	Monitoring Requirement	Timing of Action
Biological Resources			
Impacts to Special-Status Species	MM BIO-1 Worker Environmental Awareness Training. Prior to the initiation of BESS construction, a Worker's Environmental Awareness Program will be prepared and implemented. For this training, a qualified biologist will: ■ Provide environmental training materials that include all relevant permit conditions, avoidance and minimization measures, identification of sensitive biological resources, and legal repercussions of environmental damage. ■ Conduct a pre-construction meeting with work crews to review environmental training materials. Personnel will review the protective measures from the relevant permits. New crew members brought on during the Project will receive the same level of training. ■ Copies of the permits and educational information will be distributed to personnel to be available at the work site.	Applicant to implement training program.	Prior to and during construction.
	MM BIO-2 Invasive Species Control. The Environmental Awareness training will include identification of common invasive species known to the local area, inspection procedures, and removal methodologies. Invasive species inspections and maintenance will be incorporated into Operation and Maintenance documentation for the Project.	Applicant to implement training program.	Prior to, during construction, and after construction.
	MM BIO-3 Special Status Wildlife Avoidance. ■ Within 3 days prior to initial clearing and grubbing of vegetation, a qualified biologist will conduct a pre-construction survey for special-status wildlife species, including the Western red bat. Should special-status species be observed, they will be monitored as grading and clearing progresses to confirm that they safely move out of the area. ■ To protect potential red bat roosting habitat, pre-construction surveys will be conducted by a qualified biologist to identify suitable roost trees, particularly large mature trees with exfoliating bark or dense foliage. If active roosts are identified, a no-disturbance buffer of at least 100 feet will be established around the roost site, and work within this buffer will be postponed until the bats have naturally vacated the area. Vegetation removal will be scheduled outside of the bat maternity season (typically April 1 to August 31) to avoid disturbing maternal colonies. ■ Trenches will be covered overnight, or a ramp will be provided at one end for wildlife to escape.	Conduct clearance surveys.	Prior to any vegetation removal or ground disturbing activities during construction.
Impacts to Crotch's Bumble Bee	MM BIO-4 Crotch's Bumble Bee. Consistent with CDFW's 2023 guidance (Survey Considerations for CESA Candidate Bumble Bee Species), three visual survey passes for foraging and nesting Crotch bumble bee will be conducted by a qualified biologist during the Colony Active Period (April to August) preceding the initiation of construction. The survey passes will be separated by no less than 2 weeks and no more than 4 weeks. Survey passes will take place during the day (at least 1 hour after sunrise and 2 hours before sunset) on warm (65-90 degrees Fahrenheit), sunny days with low wind (less than 8 miles per hour). Survey results, including negative findings, will be submitted to the City. If survey results are negative, no further actions are required. Should Crotch bumblebee nests/colonies be detected within the Parcel during surveys, an avoidance plan will be developed, if feasible, in consultation with the	Conduct clearance surveys.	Prior to any vegetation removal or ground disturbing activities during construction.

Impact Category	Mitigation Measure	Monitoring Requirement	Timing of Action
	City and in coordination with CDFW. No construction permits will be issued until the plan has been approved by the City and no further actions are required. If avoidance is infeasible, the Project proponent will initiate consultation with CDFW. No construction permits will be issued until a 2081 Incidental Take Permit is issued or CDFW provides written concurrence that a 2081 Incidental Take Permit is unnecessary.		
Impacts to State or Federally Protected Wetlands	MM BIO-5 Fugitive Dust Control and Stormwater Protection. To minimize fugitive dust emissions and protect stormwater quality during construction, a combination of targeted design elements and operational practices will be implemented. Stabilized construction entrances using gravel pads will be installed at all access points to reduce sediment track-out, which can lower offsite dust transport by up to 80%. A water application system, including water trucks will be used to maintain soil moisture on disturbed surfaces, reducing airborne dust by up to 90% during active grading. Wind breaks such as temporary fencing or vegetative buffers will be placed strategically to reduce wind velocity and dust dispersion by 30–50%. Soil stockpiles will be covered with tarps and surrounded by silt fencing to prevent erosion and reduce dust emissions by over 95%. To maintain stormwater quality and hydraulic function, erosion and sediment control BMPs—including fiber rolls, check dams, and inlet protection—will be installed to prevent sediment-laden runoff while preserving flow conveyance. Daily inspections and adaptive management will ensure the effectiveness of these measures and compliance with regulatory requirements.	Applicant to implement best management practices to avoid fugitive dust and maintain water quality.	Prior to construction.
Impacts to Nesting Birds	MM BIO-6 Nesting Bird Avoidance. Removal of vegetation between 1 March and 15 September will be avoided to the extent feasible. Should vegetation removal be required on the Project site between 1 March and 15 September, a qualified biologist will conduct nesting bird surveys no more than 7 days prior to vegetation removal. If pre-construction surveys detect an active nest, no vegetation clearing, grading, construction, or other development activity will be permitted within 100 feet of the nest site (300 feet for raptors) during the nesting and fledging season to the extent feasible.	Applicant to conduct pre-construction surveys and avoid removal of vegetation during nesting bird season.	Prior to and during construction.
Cultural Resources			
Impacts to unknown buried Cultural Resources	MM C-1 Cultural Resources Awareness Training. Prior to the initiation of construction, all construction personnel shall be trained by an archaeologist qualified under 36 Code of Federal Regulations ⁶¹ regarding the recognition of possible buried cultural resources (i.e., Native American and/or historical artifacts, objects, or features) and protection of all archaeological resources during construction. Training shall inform all construction personnel of the procedures to be followed upon the discovery of cultural materials. All personnel shall be instructed that unauthorized removal or collection of artifacts is a violation of state law. Any excavation contract (or contracts for other activities that may have subsurface soil impacts) shall include clauses that require construction personnel to attend the Workers' Environmental Awareness Program, so they are aware of the potential for inadvertently exposing buried archaeological deposits.	Applicant to implement training program.	Prior to and during construction.
	MM C-2 Inadvertent Discovery of Historical Resources, Unique Archaeological Resources, or Tribal Cultural Resources. If previously unidentified cultural resources are uncovered during construction activities, construction work within 50 feet of the find shall be halted and directed away from the discovery until an archaeologist qualified by the Secretary of the	Applicant to report discovery to qualified archaeologist and City, and	During construction.

Impact Category	Mitigation Measure	Monitoring Requirement	Timing of Action
	Interior assesses the significance of the resource, in consultation with consulting Tribe(s), and makes a recommendation to the City of Goleta. The archaeologist, in consultation with the City of Goleta, consulting Tribe(s), and any other responsible public agency, shall make the necessary plans for treatment of the find(s) and for the evaluation and mitigation of impacts if the find(s) is found to be eligible to the California Register, local register or qualify as a unique archaeological resource or a TCR under CEQA (PRC §21083.2).	consulting Tribe(s) as needed.	
	MM C-3 Treatment of Human Remains. Any human remains discovered in the Project site are to be treated with respect and dignity. Per Public Resources Code Section 5097.98(b), upon discovery of human remains, the following must occur: all work within 50 feet of the discovery area must cease immediately, nothing in the Project site is to be disturbed, and the area must be secured. Per Health and Safety Code section 7050.5, the County Coroner's Office must be called in the event of an inadvertent discovery of human remains. The Coroner has two working days to examine the remains after notification. The appropriate land manager/owner of the site is to be called and informed of the discovery. It is very important that the suspected remains, and the area around them, are undisturbed and the proper authorities called to the scene as soon as possible, because it could be a crime scene. The Coroner would determine if the remains are archaeological/historic or of modern origin and if there are any criminal or jurisdictional questions. After the Coroner has determined that the remains are archaeological/historic-era, the Coroner would make recommendations concerning the treatment and disposition of the remains to the person responsible for the excavation, or to his or her authorized representative. If the Coroner believes the remains to be those of a Native American, the Coroner shall contact the Native American Heritage Commission (NAHC) by telephone within 24 hours. Per Public Resources Code section 5097.98, the NAHC would immediately notify the person it believes to be the most likely descendant (MLD) of the remains. The MLD has 48 hours from the time given to access the site to make recommendations to the landowner for treatment or disposition of the human remains. If the descendant does not make recommendations within 48 hours, the landowner shall reinter the remains in an area of the property secure from further disturbance. If the landowner does not accept the descendant's recommendations, the owner or the descendant may request mediation by NAHC. According to the California Health and Safety Code, six or more human burials at one location constitute a cemetery (Section 8100), and willful disturbance of human remains is a felony (Section 7052).	Applicant to report discovery to County Coroner's Office.	During construction.
Geology and Soils			
Impacts to geology and soils	MM GEO-1 Inadvertent Discovery of Unique Paleontological Resources or Geologic Features. If previously unidentified paleontological resources or geologic features are uncovered during construction activities, construction work within 50 feet of the find shall be halted and directed away from the discovery until a qualified paleontologist or geologist assesses the significance of the resource. The paleontologist or geologist, in consultation with the City of	Applicant to report unidentified paleontological resources or geologic features to qualified paleontologist and City.	During construction.

Impact Category	Mitigation Measure	Monitoring Requirement	Timing of Action
	Goleta, and any other responsible public agency, shall make the necessary plans for treatment of the find(s) and for the evaluation and mitigation of impacts.		
Hazards and Hazardous Materials			
Accidental Release of 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 ground-water 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.	Applicant to develop and implement its Emergency Response Plan and Site Safety Plan.	Prior to and during construction.

Impact Category	Mitigation Measure	Monitoring Requirement	Timing of Action
	■ 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 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.		

Impact Category	Mitigation Measure	Monitoring Requirement	Timing of Action
Transportation and Traffic			
Construction Traffic	MM T 1 Construction Traffic Control Plan. Prior to the start of construction, Scale Microgrids, LLC shall prepare and submit a Construction Traffic Control Plan for review and approval to the City of Goleta (City) Planning Department for public roads and transportation facilities that would be directly affected by the construction activities and/or would require permits and approvals. Scale Microgrids, LLC shall submit the Construction Traffic Control Plan to the City prior to construction. The Construction Traffic Control Plan shall include, but not be limited to: ■ Identification of any routes that would require lane closures or detours to accommodate material and equipment deliveries and methods to ensure safety. ■ Avoidance of peak travel hours (8:00 10:00 a.m. and 4:00 6:00 p.m.) to the maximum extent feasible. ■ Plans to coordinate in advance with emergency service providers to avoid restricting the movements of emergency vehicles. Police departments and fire departments shall be notified in advance by Scale Microgrids, LLC of the proposed locations, nature, timing, and duration of any roadway disruptions, and shall be advised of any access restrictions that could impact their effectiveness. At locations where roads will be blocked, provisions shall be ready at all times to accommodate emergency vehicles. ■ Plans to coordinate in advance with property owners, if any, that may have limited access to properties.	Applicant to prepare Construction Traffic Control Plan for review and approval by the City.	Prior to and during construction.
Mandatory Findings of Significance (Cumulative Impacts)			
Construction Noise	MM NOI-CUM-1 Concurrent Construction Coordination Plan. Prior to any ground-disturbing activities, the Project Applicant shall coordinate with the adjacent project proponent(s) to identify overlapping construction periods. If concurrent activities are scheduled within 500 feet of a shared property line, the applicants shall develop a construction noise reduction plan in consultation with the City. The plan may include but is not limited to: staggered work schedules, use of quieter equipment, temporary sound barriers, and notification to nearby sensitive receptors.	Applicant to implement noise reduction plan, which includes use of quieter equipment and sound barriers, and provide advanced notification.	Prior to and during construction.