4.6 Hazards and Hazardous Materials

This section addresses impacts associated with the transport, use, or disposal of hazardous materials, risk of upset related to hazardous materials, hazards to schools, hazardous materials cleanup sites, airports, emergency response plans, and wildfires.

4.6.1 Environmental Setting

The term hazardous material has different definitions for different regulatory programs. For the purpose of this Program Environmental Impact Report (EIR), the term hazardous material refers to both hazardous materials and hazardous waste. The California Health and Safety Code Section 25501(n)(1) defines a hazardous material as any material that, "because of its quantity, concentrations, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment." Hazardous materials include but are not limited to hazardous substances, hazardous waste, and any material that a handler or the administering agency has a reasonable basis for believing would be injurious to the health and safety of persons or harmful to the environment if released into the workplace or environment.

Prior to the 1980s, most land disposal of chemicals was unregulated, resulting in numerous industrial properties and public landfills becoming dumping grounds for unwanted chemicals. Sources of contamination in Santa Barbara include past industrial uses; fertilizer and pesticide use from historic agricultural practices; the coast route of the Southern Pacific Railroad, which facilitates the shipment of hazardous materials; historic rubble from an earthquake occurring in 1925; and historic dumping sites within the Downtown and Funk Zone of Santa Barbara. The Santa Barbara County Public Health Department, Environmental Health Services Division's Site Mitigation Unit (SMU) program provides regulatory oversight for the clean-up of hazardous material releases into the environment. In addition, the Central Coast Regional Water Quality Control Board (RWQCB) oversees the Leaking Underground Fuel Tank (LUFT) program for Santa Barbara county. LUFT sites and SMU sites within the city of Santa Barbara are primarily located within the Downtown Santa Barbara area (State Water Resources Control Board 2024). These sites are primarily comprised of former gas stations, dry cleaning facilities, and autobody shops. Soil and groundwater can become contaminated by hazardous material releases in a variety of ways, including permitted or illicit use and accidental or intentional disposal or spillage.

A material is hazardous if it exhibits one or more of the following characteristics: toxicity, ignitability, corrosivity, and reactivity. These types of hazardous materials are defined below:

- **Toxic Substances.** Toxic substances may cause short-term or long-lasting health effects, ranging from temporary effects to permanent disability, or even death. For example, such substances can cause disorientation, acute allergic reactions, asphyxiation, skin irritation, or other adverse health effects if human exposure exceeds certain levels (the level depends on the substances involved and is chemical-specific). Carcinogens, substances that can cause cancer, are a special class of toxic substances. Examples of toxic substances include benzene (a component of gasoline and suspected carcinogen) and methylene chloride (a common laboratory solvent and a suspected carcinogen).
- **Ignitable Substances.** Ignitable substances are hazardous because of their ability to burn. Gasoline, hexane, and natural gas are examples of ignitable substances.

- **Corrosive Materials.** Corrosive materials can cause severe burns. Corrosives include strong acids and bases such as sodium hydroxide (lye) or sulfuric acid (battery acid).
- **Reactive Materials.** Reactive materials may cause explosions or generate toxic gases. Explosives, pure sodium or potassium metals (which react violently with water), and cyanides are examples of reactive materials.

a. Contaminated Sites

The City has identified parcels in Santa Barbara with known contamination issues. California Government Code Section 65962.5 requires the California Environmental Protection Agency (CalEPA) to compile, maintain, and update specified lists of hazardous material release sites, also referred to as the Cortese List. This list includes the Site Mitigation and Brownfields Reuse Program Database (CalSites).The California Environmental Quality Act (CEQA) Guidelines (Public Resources Code [PRC] Section 21092.6) requires the Lead Agency to consult the lists compiled pursuant to Government Code Section 65962.5 to determine whether a project site or any alternatives are identified on any of the following lists:

- List of Hazardous Waste and Substances sites from Department of Toxic Substances Control (DTSC) EnviroStor database.
- List of Leaking Underground Storage Tank (LUST) sites from the State Water Board's GeoTracker database.
- List of solid waste disposal sites identified by Water Board with waste constituents above hazardous waste levels outside the waste management unit.
- List of active Cease and Desist Orders (CDO) and Cleanup and Abatement Orders (CAO) from the Regional Water Board.
- List of hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code, identified by DTSC.

Reviews of the Department of Toxic Substances Control's (DTSC) EnviroStor database and the SWRCB's GeoTracker database indicate a variety of hazardous waste sites located throughout the city (Figure 4.6-1). As of 2024, there are 453 known past or existing LUST sites and Clean Up sites within the city, which have required regulatory oversight to address site contamination issues. Of these LUST sites, 397 sites are closed, and 56 sites remain open and undergoing remediation. In addition, the city contains one DTSC Envirostor Hazardous Waste Site and 22 CDO and CAO sites as of 2024 (Figure 4.6-2). There are no federal Superfund sites within the city. Appendix D provides a summary of the number of each type of site along with a definition of site type for the Cortese List sites in the city.

Table 4.6-1 Known Cortese List Sites within the City of Santa Barbara

Site Type	Number of Sites	Definition	Source
LUST Cleanup Site	268	Includes all UST sites that have had an authorized release (i.e., leak or spill) of a hazardous substance, usually fuel hydrocarbons, and are being cleaned up.	SWQCB Geotracker 2024
State Response Hazardous Waste Site	1	Identifies confirmed release sites where Department of Toxic Substances Control (DTSC) is involved in remediation, either in a lead or oversight capacity. These confirmed release sites are generally high-priority and high potential risk.	DTSC Envirostor 2024
CDO and CAO sites	22	Active CDO and CAO from the State Water Board. Please Note: This list contains many Cease-and-Desist Orders and Cleanup and Abatement Orders that do NOT concern the discharge of wastes that are hazardous materials.	SWQCB 2024

The City and the Santa Barbara County Environmental Health Services Division (EHS) have identified areas of the city that have the potential to contain historic fill material (Figure 4.6-3). The area consists of low-lying land, historic commercially zoned areas, and/or natural drainages that have been filled in as the city has developed. Infilling began in the 1800s and continued until at least the early 1950s. The most significant infilling occurred after the 1925 earthquake, which resulted in significant damage to unreinforced masonry commercial structures.

Fill generally consisted of dirt mixed in with historic debris, such as ceramics, glass, brick, metal, and other household items. Depending on the original source, the soil may contain petroleum products and be stained and odiferous. Contaminants may include Total Petroleum Hydrocarbons (gasoline, Stoddard solvent, diesel, kerosene and/or oil), Polycyclic Aromatic Hydrocarbons (lamp black), Volatile Organic Compounds (benzene, toluene, ethylbenzene, xylenes, chlorinated solvents, etc.), metals (lead, arsenic, cadmium, cooper, etc.), and other constituents (cyanide, PCBs, organochlorine pesticides, etc.). Some of these constituents are found at RCRA and non-RCRA Hazardous Waste levels and require special handling.

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Figure 4.6-1 Geotracker List Sites

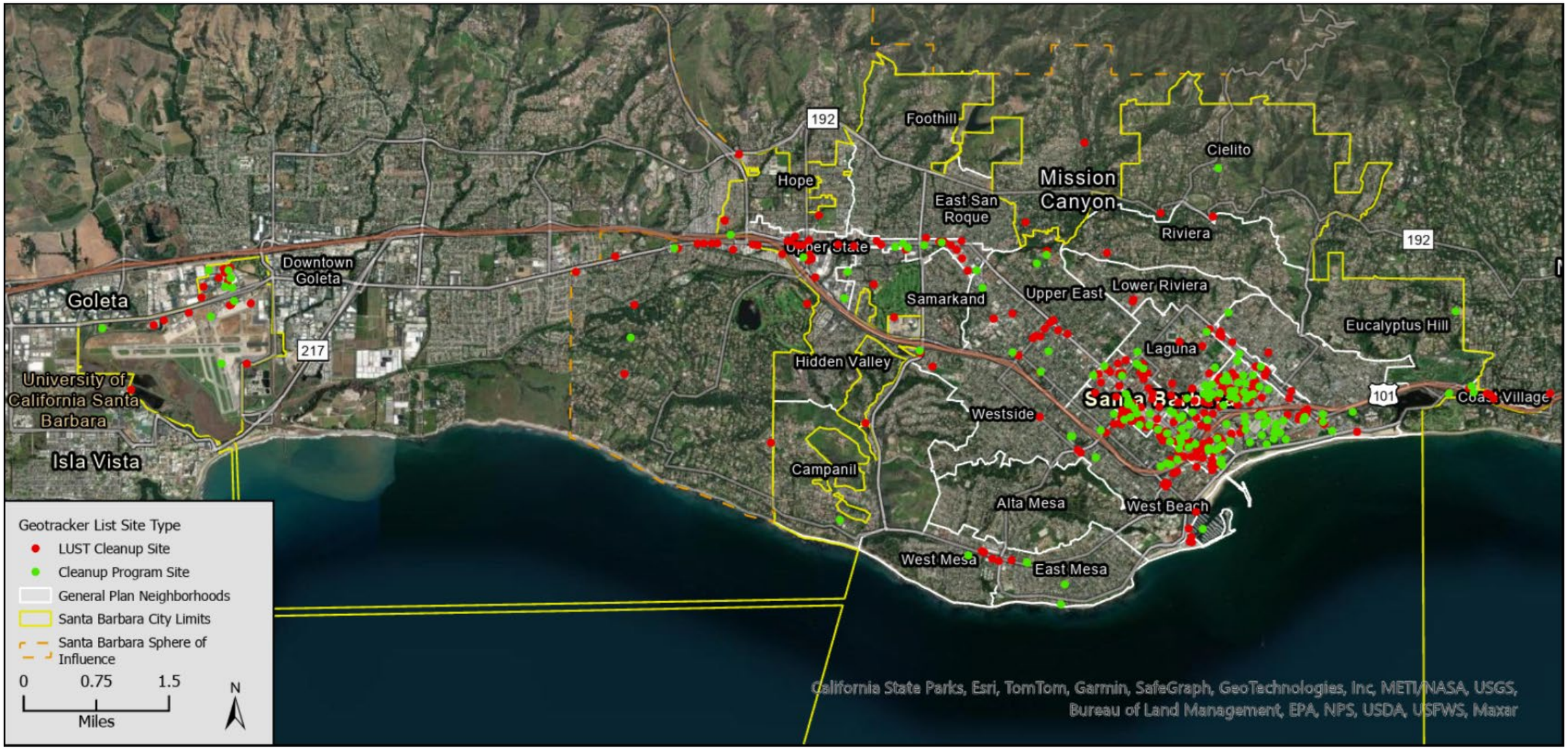

Figure 4.6-2 Active Cease and Desist Order and Cleanup and Abatement Order Sites

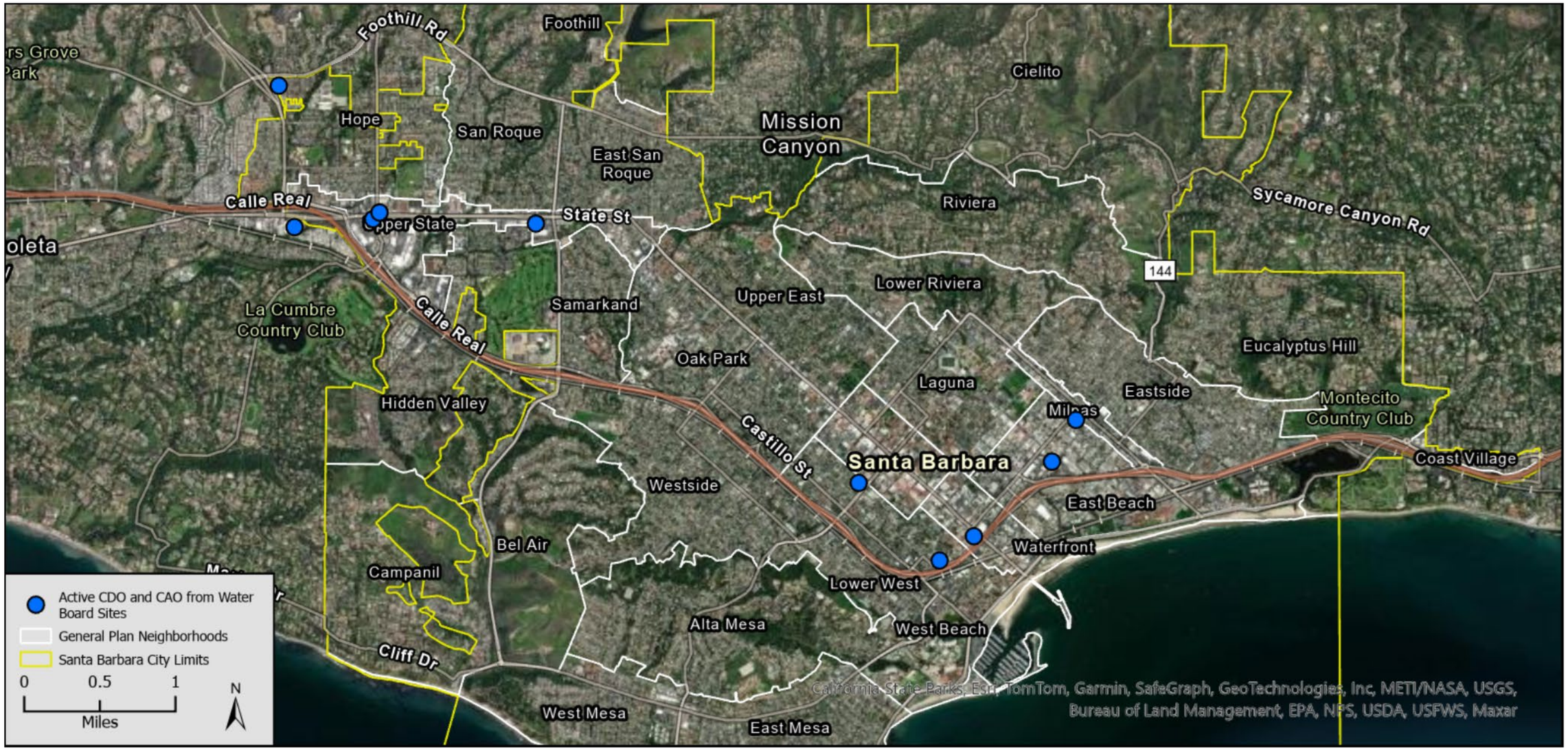

Figure 4.6-3 Areas of Potentially Contaminated Fill

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In addition, the following databases identify other potential contamination sites that may not be included on the Cortese List:

- SWQCB Clean Up Program Sites: Clean Up Program sites include non-federally owned sites that are regulated under the State Water Resources Control Board's Site Cleanup Program and/or similar programs conducted by each of the nine Regional Water Quality Control Boards. Cleanup Program Sites are varied and include but are not limited to pesticide and fertilizer facilities, rail yards, ports, equipment supply facilities, metals facilities, industrial manufacturing and maintenance sites, dry cleaners, bulk transfer facilities, refineries, mine sites, landfills, RCRA/CERCLA cleanups, and some brownfields. Unauthorized releases detected at Cleanup Program Sites are highly variable and include but are not limited to hydrocarbon solvents, pesticides, perchlorate, nitrate, heavy metals, and petroleum constituents, to name a few. As of 2024, there are 159 Clean Up Program sites within the city (SWQCB 2024).
- Oil Wells: CalGEM has jurisdiction over more than 242,000 wells, including nearly 101,300 defined as active or idle oil producers. CalGEM's authority extends from onshore to three miles offshore. CalGEM retains well records dating back to the early 1900s. The abandoned Mesa Oil Field is located within the Mesa Neighborhood of the city of Santa Barbara and contains dozens of oil wells that were drilled, plugged, and abandoned in the first half of the 20th century.
- USEPA National Priorities List: Lists all sites under the U.S. Environmental Protection Agency (USEPA) Superfund program, which was established to fund the cleanup of contaminated sites that pose risks to human health and the environment.
- USEPA CERCLIS and Archived Sites: The Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) list contains 15,000 sites nationally identified as hazardous sites. This would also involve a review of archived sites that have been removed from CERCLIS due to No Further Remedial Action Planned status.
- USEPA RCRIS (RCRAInfo): Resource Conservation and Recovery Act Information System (RCRIS or RCRAInfo) is a national inventory system for hazardous waste handlers. Generators, transporters, handlers, and disposers of hazardous waste are required to provide information for this database.
- DTSC HazNet: DTSC uses this database to track hazardous waste shipments.

Commercial/Industrial Facilities

Santa Barbara County EHS is the Certified Unified Planning Agency (CUPA) and regulates hazardous materials use and storage through the Business Plan program. Facilities that require a Business Plan include iron and metal working, auto repair, cellular phone service providers, metal plating and photo/color services, public pools/pool companies, auto parts stores, dry cleaners, grocery stores, hospital/medical facilities, gas stations, airports, and electricity substations. Facilities that store hazardous materials that could pose an explosion, fire hazard, or toxic fume-threat (such as sulfuric acid or chlorine gas) are not permitted near predominantly residential neighborhoods and/or facilities that house immobile populations (i.e., schools, childcare centers, and convalescent homes). Hazardous materials are governed by regulations that require proper storage and handling, employee and public noticing, spill contingency planning, business/environmental management plans, and other emergency preventative and response measures necessary to ensure public safety and to minimize the risk of accidental releases and associated environmental impacts.

Santa Barbara County EHS has the responsibility of emergency planning for hazardous materials incidents and for coordination among other emergency response agencies. The City of Santa Barbara Fire Department, Fire Prevention Bureau has Standard Operating Procedures for the City's Emergency Response Area Plan (City of Santa Barbara 2023a).

b. Other Hazardous Materials

Transportation Corridors

A potential source of major hazardous materials incidents are transportation accidents involving a vehicle or rails carrying hazardous materials. Truck weight limit and regulatory manifest tracking requirements regulate truck traffic for tankers carrying hazardous materials. Tanker trucks transporting hazardous materials travel via US Highway 101, State Route (SR) 192 and SR 154 (Federal Motor Carrier Safety Administration 2020). Hazardous materials are transported through the city via the Union Pacific Railroad on several northbound and southbound freight trains daily. Material shipped includes explosives, compressed and liquefied gasses, petroleum products, agricultural chemicals, industrial chemicals, military ordinance, radioactive materials, and hazardous wastes.

Asbestos Containing Materials

Asbestos is a naturally occurring fibrous material that was widely used in structures built between 1945 and 1978 for its fireproofing and insulating properties. Asbestos-containing materials (ACM) were banned by the United States Environmental Protection Agency (USEPA) between the early 1970s and 1991 under the authority of the federal Clean Air Act (FCAA) and the Toxic Substances Control Act (TSCA) due to their harmful health effects. Exposure to asbestos increases risk of developing lung disease, such as lung cancer, mesothelioma, or asbestosis (USEPA 2023a). Common ACMs include vinyl flooring and associated mastic, wallboard and associate joint compound, plaster, stucco, acoustic ceiling spray, ceiling tiles, heating system components, and roofing materials. Pre-1973 commercial and industrial structures are affected by asbestos regulations if damage occurs, or if remodeling, renovation, or demolition activities disturb ACMs.

Lead and Lead-Based Paint

Lead is a naturally occurring metallic element. Because of its toxic properties, lead is regulated as a hazardous material. Excessive exposure to lead can result in the accumulation of lead in the blood, soft tissues, and bones. Children are particularly susceptible to potential lead-related health problems because lead is easily absorbed into developing systems and organs. Lead can affect almost every organ and system in the body. In children, lead can cause behavior and learning problems, lower IQ and hyperactivity, hearing problems, and anemia. In adults, lead can cause cardiovascular effects, decreased kidney function, and reproductive problems. In addition, lead can result in serious effects to the developing fetus and infant for pregnant women (USEPA 2023b). Among its numerous uses and sources, lead can be found in paint, water pipes, solder in plumbing systems, and in soils surrounding buildings and structures that are painted with lead-based paint (LBP). LBP was primarily used during the same time period as ACMs. Pre-1978 commercial and industrial structures are affected by LBP regulations if the paint is in a deteriorated condition or if remodeling, renovation, or demolition activities disturb LBP surfaces.

Oil and Gas

The Southern California Gas Company operates a network of natural gas lines through Santa Barbara. In addition, numerous historic oil drilling wells exist on the Mesa within the Mesa Oil Field discovered in 1929. These wells were plugged and abandoned to the standards of their time and often do not meet current standards. It remains a possibility that historic wells have the potential to leak. These wells are located in varying areas on either side of Cliff Drive from La Marina Road on the east side to Mesa Lane on the west side in primarily residential neighborhoods. CalGEM has jurisdiction over these historic wells and may require property owners to implement measures to address wells that are leaking.

c. Wildfire Hazards

Wildfire hazards have been a significant part of Santa Barbara history and remain a great natural hazard to the Santa Barbara community. The interface between the urban land and wildlands in the Santa Ynez Mountains poses a substantial fire risk to the homes and structures in the Santa Barbara front-country. The combination of steep terrain, rocky outcroppings, dense chaparral, vegetation, dry summer climate, and local Santa Ana and Sundowner winds creates a high fire hazard environment. As part of the natural ecosystem, wildfire hazard is an inherent risk for those that choose to live in the area. Difficult and limited access makes these wildfires extremely challenging to battle after ignition.

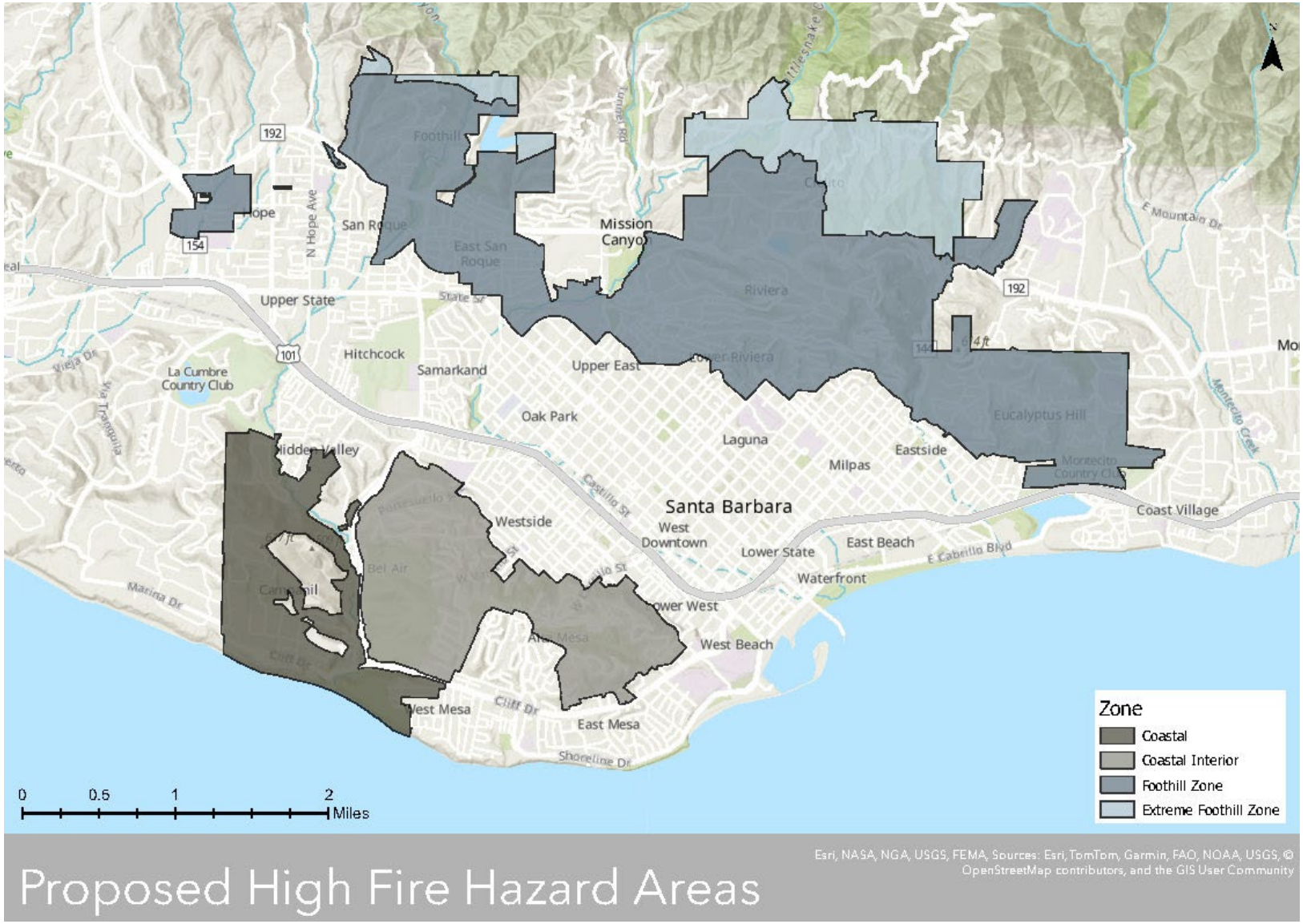
Public water systems are designed and maintained to fight individual structure fires, and development applicants are required to meet fire flow requirements for structures as determined by the City or County Fire Department, as applicable. Water flow from public water systems are sometimes able to help protect structures during wildfires, however it cannot be expected that flow from fire hydrants could be effective in stopping the advance of a major wildfire.

The fire history and potential for loss of life, property, and natural resources due to wildfires have made fire planning a priority for the City. Several comprehensive wildfire programs have been developed by the City including the City of Santa Barbara Emergency Management Plan and the Santa Barbara Community Wildfire Protection Plan (CWPP) (City of Santa Barbara 2021a).

Fire Hazard Areas

Vegetation of the Santa Ynez Mountains is primarily dense chaparral. Santa Barbara's Mediterranean climate is characterized by concentrated precipitation from October to May and dry summers. Steep terrain and dense vegetation make some neighborhoods and structures adjacent to the Santa Ynez Mountains and other open space areas susceptible to greater risk of wildfire. This wildland urban interface boundary runs approximately 8 miles along the city's northern boundary. The California Department of Forestry and Fire Protection (CAL FIRE) has identified fire hazard zones in the city and the surrounding areas. CAL FIRE's State fire hazard severity zone map for Santa Barbara was updated in 2022. In 2025, CAL FIRE updated Local Responsibility Maps where the city is responsible for wildfire protection. In July 2025, the City adopted updated High Fire Hazard Area maps that align with but also expand beyond CAL FIRE's designated Very High, High, and Moderate Fire Hazard Severity Zones. Per CAL FIRE, the Very High Fire Hazard Severity Zones are located in Cielito, foothills above San Roque and the Northridge/Santa Teresita area. High Fire Hazard Zones are located in the Hope, San Roque, Riviera, and Bel Air neighborhoods. The City does not use the same terminology as CAL FIRE and designates high fire hazard areas as Extreme Foothill, Foothill, Coastal, and Coastal Interior. Areas of high fire hazard in Santa Barbara are shown in Figure 4.6-4.

Figure 4.6-4 High Fire Hazard Areas Surrounding Santa Barbara



4.6.2 Regulatory Setting

Hazardous materials and waste can pose a potential hazard to human health and the environment when improperly treated, stored, transported, disposed of, or otherwise mismanaged. Federal, State, and local programs that regulate the use, storage, and transportation of hazardous materials and hazardous waste are in place to prevent unwanted consequences. In addition, there are federal, State, and local programs in place designed to reduce risk involving wildland fires. These regulatory programs are designed to reduce the risk that hazardous substances may pose to people and businesses under normal daily circumstances, and as a result, reduce the risk of emergencies and disasters.

a. Federal Regulations

Resource Conservation and Recovery Act

The Resource Conservation and Recovery Act (RCRA) of 1976 gives the USEPA the authority to control hazardous waste from "cradle-to-grave." This includes the generation, transportation, treatment, storage, and disposal of hazardous waste. RCRA also sets forth a framework for the management of non-hazardous solid wastes. The 1986 amendments to RCRA enabled USEPA to address environmental problems that could result from underground tanks storing petroleum and other hazardous substances.

Toxic Substances Control Act

Congress enacted the Toxic Substances Control Act (TSCA) of 1976, codified in Title 40 of the Code of Federal Regulations (CFR), to give USEPA the ability to track the 75,000 industrial chemicals currently produced or imported into the United States. USEPA repeatedly screens these chemicals and can require reporting or testing of those that may pose an environmental or human-health hazard. USEPA can ban the manufacture and import of those chemicals that pose an unreasonable risk. More specifically, in California, polychlorinated biphenyls (PCBs) are regulated by both State (RCRA and Title 22 of the California Code of Regulations [CCR]) and federal (TSCA) rules. TSCA has banned the manufacture, processing, use, and distribution in commerce of PCBs. TSCA gives USEPA the authority to develop, implement and enforce regulations concerning the use, manufacture, cleanup, and disposal of PCBs. TSCA also establishes USEPA's Lead Abatement Program regulations, which provide a framework for lead abatement, risk assessment, and inspections. Those performing these services are required to be trained and certified by USEPA.[1]

U.S. Department of Transportation Regulations

USDOT prescribes strict regulations for the safe transportation of hazardous materials, including requirements for hazardous waste containers and licensed haulers that transport hazardous waste on public roads. The Secretary of the USDOT receives the authority to regulate the transportation of hazardous materials from the Hazardous Materials Transportation Act (HMTA), as amended and codified in 49 U.S. Code (U.S.C.) Section 5101 et seq. The Secretary is authorized to issue regulations to implement the requirements of 49 U.S.C. Title 49 of the CFR, which contains the regulations set forth by the HMTA, specifies requirements and regulations with respect to the transport of hazardous materials. It requires that every employee who transports hazardous materials receives

[1] USEPA*, 40 CFR Park 745, Rules 402 and 404*, August 29, 1996.

training to recognize and identify hazardous materials and become familiar with hazardous materials requirements. Under the HMTA, the Secretary "may authorize any officer, employee, or agent to enter upon, inspect, and examine, at reasonable times and in a reasonable manner, the records and properties of persons to the extent such records and properties relate to: (1) the manufacture, fabrication, marking, maintenance, reconditioning, repair, testing, or distribution of packages or containers for use by any 'person' in the transportation of hazardous materials in commerce; or (2) the transportation or shipment by any 'person' of hazardous materials in commerce."

Occupational Safety and Health Act of 1970

The U.S. Department of Labor's OSHA was created to assure safe and healthful working conditions by setting and enforcing standards and by providing training, outreach, education, and assistance. OSHA provides standards for general industry and construction industry on hazardous waste operations and emergency response. The Occupational Safety and Health Act, which is implemented by OSHA, contains provisions with respect to hazardous materials handling. Federal Occupational Safety and Health Act requirements, as set forth in Title 29 of the CFR Section 1910, et. seq., are designed to promote worker safety, worker training, and a worker's right-to-know. OSHA has delegated the authority to administer OSHA regulations to the State of California.

Title 49 of the CFR, which contains the regulations set forth by the Hazardous Materials Transportation Act of 1975, specifies additional requirements and regulations with respect to the transport of hazardous materials. Title 49 of the CFR requires that every employee who transports hazardous materials receive training to recognize and identify hazardous materials and become familiar with hazardous materials requirements. Drivers are also required to be trained in function and commodity-specific requirements.

Federal Disaster Mitigation Act

The Disaster Mitigation Act of 2000 requires a State-level mitigation plan as a condition of disaster assistance and provides funding to communities developing their own mitigation plans through the Pre-Disaster Mitigation Grant Program. There are two different levels of State disaster plans: "Standard" and "Enhanced." States that develop an approved Enhanced State Plan can increase the amount of funding available through the Hazard Mitigation Grant Program. The Act also established new requirements for local mitigation plans.

National Fire Plan

The National Fire Plan was developed in August 2000, following a historic wildfire season. Its intent is to establish plans for active response to severe wildfires and their impact to communities while ensuring sufficient firefighting capacity. The plan addresses firefighting, rehabilitation, hazardous fuels reduction, community assistance, and accountability.

b. State Regulations

The primary State agencies with jurisdiction over hazardous chemical materials management are the DTSC and the Central Coast RWQCB. Other State agencies involved in hazardous materials management include California OSHA (CalOSHA) and the State Office of Emergency Services (CalOES).

Authority for statewide administration and enforcement of RCRA rests with DTSC. While DTSC has primary State responsibility in regulating the generation, storage, and disposal of hazardous materials, DTSC may further delegate enforcement authority to local jurisdictions. In addition, DTSC is responsible and/or provides oversight for contamination cleanup and administers statewide hazardous waste reduction programs. DTSC operates programs to accomplish the following: (1) manage the aftermath of improper hazardous waste management by overseeing site cleanups; (2) prevent releases of hazardous waste by ensuring that those who generate, handle, transport, store, and dispose of wastes do so properly; and (3) evaluate soil, water, and air samples taken at sites.

The storage of hazardous materials in USTs is regulated by the SWRCB, which delegates authority to the Central Coast RWQCB on the regional level, and typically to the local fire department on the local level.

The CalOSHA program is administered and enforced by the Division of Occupational Safety and Health. CalOSHA is similar to the federal OSHA program. Both programs contain rules and procedures related to exposure to hazardous materials during demolition and construction activities. In addition, CalOSHA requires employers to implement a comprehensive, written Injury and Illness Prevention Program (IIPP). An IIPP is an employee safety program for potential workplace hazards, including those associated with hazardous materials.

The CalOES Hazardous Materials (HazMat) section under the Fire and Rescue Division coordinates statewide implementation of hazardous materials accident prevention and emergency response programs for all types of hazardous materials incidents and threats. In response to any hazardous materials emergency, the HazMat section staff is called upon to provide State and local emergency managers with emergency coordination and technical assistance.

California Occupational Safety and Health Act – California Labor Code, Section 6300 et seq.

The California Occupational Safety and Health Act of 1973 addresses California employee working conditions, enables the enforcement of workplace standards, and provides for advancements in the field of occupational health and safety. The Act also created CalOSHA, the primary agency responsible for worker safety in the handling and use of chemicals in the workplace. CalOSHA's standards are generally more stringent than federal regulations. Under the former, the employer is required to monitor worker exposure to listed hazardous substances and notify workers of exposure. The regulations specify requirements for employee training, availability of safety equipment, accident-prevention programs, and hazardous substance exposure warnings. At sites known or suspected to be contaminated by hazardous materials, workers must have training in hazardous materials operations and a Site Health and Safety Plan must be prepared, which establishes policies and procedures to protect workers and the public from exposure to potential hazards at the contaminated site.

California Code of Regulations, Title 22, Hazardous Waste Management

At the State level, under Title 22, Division 4.5 of the CCR, DTSC regulates hazardous waste in California primarily under the authority of the Federal RCRA and the California Health and Safety Code (HSC). The Hazardous Waste Control Law (HWCL), under CCR 22, Chapter 30, establishes regulations that are similar to RCRA but more stringent in their application and empowers the DTSC to administer the State's hazardous waste program and implement the federal program in California. The DTSC is responsible for permitting, inspecting, ensuring compliance, and imposing

corrective action programs to ensure that entities that generate, store, transport, treat, or dispose of potentially hazardous materials and waste comply with federal and State laws. The DTSC defines hazardous waste as waste with a chemical composition or other properties that make it capable of causing illness, death, or some other harm to humans and other life forms when mismanaged or released into the environment.

The DTSC shares responsibility for enforcement and implementation of hazardous waste control laws with the SWRCB and, at the local level, the CCRWQCB, and city and county governments.

California Code of Regulations Title 23, Chapter 15 Discharges of Hazardous Waste to Land Section 2511(b)

CCR 23, Chapter 15 Discharges of Hazardous Waste to Land Section 2511(b) pertains to water quality aspects of waste discharge to land. The regulation establishes waste and site classifications as well as waste management requirements for waste treatment, storage, or disposal in landfills, surface impoundments, waste piles, and land treatment facilities. Requirements are minimum standards for proper management of each waste category, which allows regional water boards to impose more stringent requirements to accommodate regional and site-specific conditions. In addition, the requirements of CCR 23, Chapter 15 applies to cleanup and abatement actions for unregulated hazardous waste discharges to land (e.g., spills).

California Fire Code, Title 24, Part 9

The 2022 California Fire Code, written by the California Building Standards Commission, is based on the 2021 International Fire Code (IFC). The IFC is a model code that regulates minimum fire safety requirements for new and existing buildings, facilities, storage, and processes. The IFC addresses fire prevention, fire protection, life safety, and safe storage and use of hazardous materials in new and existing buildings, facilities, and processes.

California Fire Plan

The Strategic Fire Plan for California is the State's roadmap for reducing the risk of wildfire, and the most recent iteration (2018) directed CAL FIRE to update maps of fire threat potential in California. In 2022, CAL FIRE updated their maps of fire threat potential in areas under State jurisdiction throughout California and in 2025, CAL FIRE updated their maps of Local Responsibility Areas where the local government is responsible for wildfire protection. CAL FIRE maps fire threat based on the availability of fuel and the likelihood of an area burning (based on topography, fire history, and climate). The threat levels include no fire threat, moderate, high, and very high fire threat. The CAL FIRE Office of the State Fire Marshal provides oversight of enforcement of the California Fire Code as well as overseeing hazardous liquid pipeline safety.

California Multi-Hazard Mitigation Plan

The California Office of Emergency Services (CalOES) prepares the State of California Multi-Hazard Mitigation Plan (SHMP). The SHMP identifies hazard risks and includes a vulnerability analysis and a hazard mitigation strategy. The SHMP is federally required under the Federal Disaster Mitigation Act of 2000 for the State to receive Federal funding. The Federal Disaster Mitigation Act of 2000 requires a State mitigation plan as a condition of disaster assistance.

California Public Resources Code

The California Public Resources Code (PRC) includes fire safety regulations that restrict the use of equipment that may produce a spark, flame, or fire; require the use of spark arrestors on construction equipment that use an internal combustion engine; specify requirements for the safe use of gasoline-powered tools in fire hazard areas; and specify fire suppression equipment that must be provided on-site for various types of work in fire-prone areas. These regulations include the following:

- Earthmoving and portable equipment with internal combustion engines would be equipped with a spark arrestor to reduce the potential for igniting a wildland fire (PRC § 4442);
- Appropriate fire suppression equipment would be maintained during the highest fire danger period—from April 1 to December 1 (PRC § 4428);
- On days when a burning permit is required, flammable materials would be removed to a distance of 10 feet from any equipment that could produce a spark, fire, or flame, and the construction contractor would maintain the appropriate fire suppression equipment (PRC § 4427); and
- On days when a burning permit is required, portable tools powered by gasoline-fueled internal combustion engines would not be used within 25 feet of any flammable materials (PRC § 4431).

Hazardous Wastes and Substances List (Cortese List)

California Government Code Section 65962.5, enacted in 1985 and amended in 1992, refers to the compilation of a list of sites containing known contamination and hazardous waste facilities; this is commonly referred to as the Cortese List. The presence of a site on the Cortese List has bearing on local permitting processes for land use entitlements and the California Environmental Quality Act (CEQA). While Government Code Section 65962.5 makes reference to a "list", many changes have occurred, and the sites are instead recorded on publicly available websites and databases managed by various state agencies. In accordance with CEQA Guidelines Section 15300.2(e), a categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.

c. Regional and Local Regulations

Santa Barbara County Air Pollution Control District

The federal asbestos requirements found in the National Emission Standards for Hazardous Air Pollutants (NESHAP) found in CFR Title 40, Part 61, Subpart M. USEPA has delegated the Santa Barbara County Air Pollution Control District (SBCAPCD) the authority to enforce the federal asbestos NESHAP, and SBCAPCD is the local enforcement authority for asbestos (SBCAPCD 2022).

Santa Barbara County Multi-Jurisdictional Hazard Mitigation Plan

The Santa Barbara County Multi-Jurisdictional Hazard Mitigation Plan (HMP) contains goals and objectives that are intended to reduce loss of life and property from natural disasters. The HMP was comprehensively updated in 2023 and the City is a participating agency. During the planning process, this plan used Federal Emergency Management Agency (FEMA) tools to determine the most likely possible threats would be wildfire, earthquakes, drought and water shortage, pandemic/public health emergency, energy shortage and resiliency, extreme heat and freeze, and flooding. The HMP identifies mitigation action items that aim to meet objectives and reduce the impacts of these hazards. The Santa Barbara County Office of Emergency Management leads the

responsibility for overseeing the Plan implementation and maintenance strategy. Plan implementation and evaluation will be a shared responsibility among all planning partnership members and agencies identified as lead agencies in the mitigation action plans (County of Santa Barbara 2023).

City of Santa Barbara Hazardous Waste

The City of Santa Barbara and University of California, Santa Barbara (UCSB) operate three drop-off locations, located on the UCSB campus, at 132 Nopalitos Street, and at 4430 Calle Real. The three facilities allow for residents and qualified small businesses to drop off accepted hazardous waste. Hazardous waste that is accepted includes chemical bottles, acids and caustics, batteries, light bulbs, motor oil, pesticides, and solvents (City of Santa Barbara 2022).

City of Santa Barbara Emergency Operations Plan (2021)

The Emergency Operations Plan for the City of Santa Barbara addresses the planned response to emergency situations associated with natural disasters, technological and intentional incidents, and national security emergencies in or affecting the City. The operational concepts reflected in the plan focus on potential large-scale disasters which can generate unique situations requiring expanded emergency responses. The Plan establishes the framework for implementation of the California Standardized Emergency Management System and National Incident Management System in the City of Santa Barbara. The Plan is intended to facilitate multi-agency and multi-jurisdictional coordination in emergency operations, particularly between the City of Santa Barbara, Special Districts, and the Santa Barbara County Operational Area (City of Santa Barbara 2021b).

City of Santa Barbara Storm Water Management Program

The City's Storm Water Management Program (SWMP) requires development to install stormwater protection Best Management Practices (BMPs) pertaining to stormwater. The SWMP includes a Storm Water BMP Technical Guidance Manual that provides stormwater BMP options for development. As stated in the Storm Water BMP Technical Guidance Manual, infiltration BMPs are not suitable to collect runoff from sites that use or store hazardous materials unless hazardous materials are prevented from contaminating runoff. In addition, infiltration BMPs are not suitable for industrial sites where spills can occur (City of Santa Barbara 2020).

City of Santa Barbara General Plan

The City's Land Use Element designates most of the hillside areas for low density residential development ranging from a maximum of one to three dwelling units per acre. This is intended to limit residential development in areas of steep slopes and high fire hazard.

The City's Safety Element contains policies and implementation measures related to hazards and hazardous materials. Specific policies and implementation measures include the following (City of Santa Barbara 2013):

- **S33: Fire Hazard Programs.** The City shall continue to implement programs that reduce the risk of wildland and structure fires, and that minimize the short- and long-term effects of fires.
  - Wildfire Risk Reduction. Continue to implement risk reduction measures identified by the Wildland Fire Plan, such as vegetation fuels management and vegetation chipping.
  - Limit Residential Development in High Fire Hazard Areas. Land use map designations limit residential density in High Fire Hazard Areas.

  - Wildland Fire Suppression Assessment District. Continue to implement wildfire risk reduction programs facilitated by the Wildland Fire Suppression Assessment District, such as vegetation management and homeowner education and assistance programs.
  - Coordination. Continue to coordinate fire risk prevention, management, response, recovery and public education programs with the County of Santa Barbara, Montecito Fire Protection District, U.S. Forest Service, California Emergency Management Agency, CAL FIRE, Federal Emergency Management Agency, and other agencies.

- **S34: Evacuation Routes.** Development projects located in the Extreme Foothill and Foothill High Fire Hazard Zones shall be evaluated to determine if the project would have the potential to substantially affect emergency evacuation. A project would result in a substantial effect on evacuation if it would result in either of the following conditions:
  - Physically interfere with evacuation capabilities. A project could physically interfere with evacuation capabilities if it would reduce evacuation capacity by substantially decreasing the width of road or other access way, or result in the closure of a road or access way.
  - Add substantial additional evacuees to routes with limited capacity. A project could substantially reduce evacuation capacity if it would add a considerable amount of traffic to probable evacuation routes that do not meet current Fire Department roadway or access standards; or add a considerable amount of traffic to probable evacuation routes in relation to roadway capacity and evacuation traffic volumes reasonably expected to be generated by existing development in the project area.

- **S35: Evacuation Route Evaluation.** The Fire Department shall periodically evaluate the effectiveness of existing and proposed fire emergency evacuation routes, and develop standards or conditions that can be applied to projects to assure that adequate evacuation capacity is provided and maintained.
- **S36: Fire Department Tactical Areas.** To increase fire fighter safety during wildfire emergencies, new development and major redevelopment proposals located in designated high fire hazard areas shall be reviewed to the potential for the project to provide on-site fire suppression tactical areas, such as staging areas, operational safety zones, and escape routes. Fire suppression tactical areas should be provided consistent with criteria provided by the Fire Department.
- **S37: Fire Hazard Reduction Design Requirements.** Project designs shall adequately address fire hazard, providing for appropriate site layout; building design and materials; fire detection and suppression equipment; landscaping and maintenance; road access and fire vehicle turnaround; road capacity for evacuation; and water supply.
- **S38: Fire Education and Training.** The Fire Department shall continue working with the Planning Commission, Design Review Boards, development review staff and the public to enhance understanding and appropriate application of measures to reduce fire hazard.
- **S39: Defensible Space.** Require that defensible space be provided around existing and proposed development projects located in high fire hazard areas in accordance with the Wildland Fire Plan, or as recommended by the Fire Department.
- **S40: Vegetation Management.** Vegetation management programs to reduce fire fuel loads, as well as project-related landscape and maintenance plans, shall protect and preserve environmentally sensitive habitat areas (ESHAs) and balance fire risk reduction benefits with possible aesthetic, habitat, and erosion impacts. Potential effects resulting from fuel management activities shall be avoided or reduced as feasible.

- **S41: Fire Prevention and Creek Restoration.** Coordinate fire prevention and vegetation management activities with creek and riparian resource protection by developing and implementing Best Management Practices for vegetation/fuel management operations conducted within and adjacent to creek corridors.
- **S42: Post Fire Recovery.** Rebuilding that occurs in designated high fire hazard areas shall incorporate all applicable design measures that reduce the risk of future fire-related impacts. Expedited project review and permitting shall occur as determined by the Community Development Director.
- **S43: Building Code Updates.** Periodically adopt amendments or updated provisions of the California Building Code to implement new building design measures that reduce fire risks.
- **S44: Public Water System Improvements for Fire Fighting.** Continue to periodically evaluate the potential for additional water system improvements to assist in emergency preparedness and incorporate feasible measures into the City Capital Improvement Plan.
- **S45: Private Water Supplies for Fire Fighting.** Encourage and assist homeowners in High Fire Hazard Areas to install their own emergency water supplies to support fire fighting operations.
- **S56: Hazardous Materials Exposure.** Continue to provide adequate hazardous material collection facilities and to minimize the potential for exposure to hazardous materials and to provide for their safe disposal.
- **S57: Contaminated Sites.** The City shall continue to identify ways to facilitate hazardous waste site remediation, protect public health, and minimize environmental impacts resulting from the presence of waste material and from remediation activities.
- **S59: Prioritize Remediation.** The City shall reduce health hazards associated with polluted runoff, including runoff which contains harmful bacteria and or viruses.
- **S62: Development on Sites with Contaminated Soils and High Groundwater.** New development in areas of high groundwater and high potential for contaminated soils or contaminated groundwater shall incorporate appropriate vapor control measures into the design of buildings. Control measures may include measures such as vapor barriers, passive air ventilation systems, sealing of ducts and cracks, and depressurizing soil below the foundation. New development shall comply with all County, State, and Federal regulations regarding contaminated soils.
- **S61: Electromagnetic Field Development Setbacks.** Continue application of prudent avoidance policy in siting development near transmission lines with adequate setbacks.
- **S62: Natural Gas Transmission and Distribution Pipelines.** New development shall provide adequate setbacks from natural gas transmission and distribution pipelines to facilitate pipeline maintenance activities and provide for public safety.
- **S64: Hazardous Substance Transportation.** Potential health and safety impacts that could occur as a result of hazardous substance release shall be evaluated during the environmental review of projects located adjacent to US Highway 101 and the Union Pacific railroad tracks.

Local Coastal Program

The California Coastal Act requires all local governments located within the Coastal Zone to prepare a Local Coastal Program (LCP). LCPs regulate future development within the Coastal Zone and define where public access and urbanization will occur, where industrial facilities will be placed, and how sensitive species and habitats, open spaces, and recreational areas will be protected. The City is located within a Coastal Zone, and, as such, has an LCP.

Chapter 5.1, *Coastal Hazards*, of the City's Coastal Land Use Plan (LUP) contains policies to avoid or minimize the effect of high fire hazards. Chapter 6.1, *Public Works & Energy*, of the City's LUP contains policies designed to provide guidance regarding hazardous materials transport (City of Santa Barbara 2019).

City of Santa Barbara Municipal Code

The City of Santa Barbara Municipal Code Chapter 30.180 sets performance standards for the use, handling, storage, and transportation of hazardous materials. Municipal Code Chapter 22.05 states that decisions on projects made by and on behalf of the City of Santa Barbara shall be consistent with the Hazardous Waste Management Plan for the County of Santa Barbara. The Municipal Code contains several provisions related to construction in High Fire Hazard Areas. The Slope Density Ordinance as implemented in the Zoning Ordinance requires new lots in areas with 10 percent or greater slopes to provide more lot area than required by base density to provide more open space area and limit density. Title 8, Fire Protection, of the City's Municipal Code includes International and California Fire Code adoption by reference with local amendments, fire prevention development standards, and weed abatement standards. The City's defensible space clearance requirements mandate 150 feet of defensible space in the Extreme Foothill Zone and 100 feet of defensible space in the Foothill Zone. Fire prevention standards also apply to accessory dwelling units, which are also subject to special parking standards and size limitations in the High Fire Hazard Areas due to health and safety concerns.

Municipal Code Title 27, Subdivisions, Section 27.60.020 prohibits residential development that would take place within a Very High Fire Hazard Severity Zone from utilizing the urban lot split provisions of Senate Bill 9 unless existing and proposed buildings are designed to meet the high fire construction standards adopted through Title 8 and Title 22 of the Municipal Code, and the proposed development is not located in the Foothill or Extreme Foothill High Fire Hazard Zones identified in the CWPP.

Community Wildfire Protection Plan

The City completed an update to the Community Wildfire Protection Plan (CWPP) in 2021, aimed at mitigating wildland fire impacts. CWPP Policy 7.9 requires the City of Santa Barbara's Fire Department to conduct a detailed evacuation study which addresses increased residential density on roadway capacities and evacuation capabilities (City of Santa Barbara 2021a).

As part of standard development procedures in the City, development plans must be submitted to the City's Community Development Department for review and approval to ensure that all new development has adequate emergency access and escape routes in compliance with existing City and Fire Department regulations.

4.6.3 Impact Analysis

a. Methodology and Significance Thresholds

This impact analysis addresses the potential to encounter hazardous substances during future project construction in the city resulting from Housing Plan implementation and the potential to create a significant hazard to the public or the environment. The evaluation was performed based on current conditions in the city, information in environmental databases, applicable regulations and guidelines, and future development that may have the potential to introduce hazards. Relationships and proximities of potential future development to schools were also identified.

Based on the City's environmental checklist and Appendix G of the CEQA Guidelines, a project would have a significant adverse impact related to hazards or hazardous materials if it would:

1. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.
2. 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.
3. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.
4. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment.
5. For a project located in 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, the project would result in a safety hazard or excessive noise for people residing or working in the project area.
6. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.
7. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.

In addition to Significance Threshold 7, the CEQA Guidelines include specific significance thresholds related to wildfire. These significance thresholds are discussed in Section 4.11, *Effects Found Not to Be Significant*.

b. Project Impacts and Mitigation Measures

Threshold 1:	Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Impact HAZ-1 DEVELOPMENT FACILITATED BY THE HOUSING PLAN COULD RESULT IN THE ROUTINE TRANSPORT, USE, OR DISPOSAL OF HAZARDOUS MATERIALS. COMPLIANCE WITH APPLICABLE LOCAL, STATE, AND FEDERAL REGULATIONS WOULD MINIMIZE THE RISK OF POTENTIAL EXPOSURE OF THE PUBLIC TO HAZARDOUS MATERIALS. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

New residential uses facilitated by Housing Plan programs may require the routine transport, use and storage of limited quantities of hazardous materials. The use, transport, and disposal of hazardous materials and wastes are required to comply with federal, state, and local regulations. These regulatory safeguards minimize exposure of the public and environment to a potential release of hazardous materials.

Construction of residential development may involve limited quantities of regulated hazardous materials, such as vehicle fuels and fluids, petroleum products, solvents, and paint. Contractors of individual development projects would be required to implement standard construction BMPs for the use of handling such materials to avoid or reduce the potential for a spill, leak, or other release to occur. These types of hazardous materials are not acutely hazardous in small quantities. All storage, handling, use, and disposal of these materials are regulated by local, state, and federal regulations, and minimize the risk of a release during construction. Regulations include the

Hazardous Material Transportation Act, Resource Conservation and Recovery Act, the California Hazardous Materials Management Act, and California Code of Regulations Title 22. Oversight by appropriate agencies, including, but not limited to, the Central Coast RWQCB, DTSC, Santa Barbara County EHS, and SBCAPCD, and compliance by new development with applicable regulations related to the handling and storage of hazardous materials would minimize risk associated with potential exposure of the public to these substances.

After construction is completed, residential uses are not a land use typically associated with the use, transportation, storage, or generation of significant quantities of hazardous materials. Operation of new residential units may result in incremental uses in common household chemicals and regulated hazardous materials, such as cleaning and degreasing solvents, fertilizers, pesticides, and other materials used in regular property and landscaping maintenance. Compliance with the City's SWMP and regulation and guidelines for proper waste disposal minimize the potential for a release above regulatory levels. Pursuant to the City's SWMP, stormwater infiltration BMPs would not be permitted for use on sites that use or store hazardous materials unless hazardous materials are prevented from contaminating runoff. There are multiple hazardous waste services provided in the City and Santa Barbara County that encourage the responsible disposal of household hazardous wastes, including the Community Hazardous Waste Center at the University of California, Santa Barbara; MarBorg Industries Antifreeze, Batteries, Oil, and Paint facility; South Coast Recycling and Transfer Station; and various local businesses accept household hazardous wastes (City of Santa Barbara 2022b).

Mandatory compliance with all applicable local, state, and federal laws and regulations relating to the transportation, use, and disposal of hazardous materials during construction and operation of development forecasted in accordance with the Housing Plan would reduce potential impacts to a less than significant level. Therefore, Housing Plan implementation would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

Mitigation Measures

No mitigation measures are required.

Threshold 2:	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?

Impact HAZ-2 COMPLIANCE WITH APPLICABLE LOCAL, STATE, AND FEDERAL REGULATIONS WOULD MINIMIZE POTENTIAL HAZARDS FROM REASONABLY FORESEEABLE UPSET AND ACCIDENT CONDITIONS INVOLVING THE RELEASE OF HAZARDOUS MATERIALS INTO THE ENVIRONMENT. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION.

As described in Section 4.6.1, *Environmental Setting* , development facilitated by the Housing Plan could occur on sites with either known or unknown contamination or sites containing a past release of hazardous materials, including but not limited to Clean Up Program sites, sites containing potentially contaminated artificial fill material, and sites with building materials containing hazardous materials. Disturbance of these sites and materials during construction may result in the exposure of contaminants or hazardous materials to site workers, residents, or neighboring uses including schools or other residential uses.

Further, sites that have previously undergone remediation may have residual contamination that could affect new residential land uses. Therefore, development forecasted in accordance with the Housing Plan would have the potential to expose these hazardous materials during construction activities.

Soil and Groundwater Contamination

Existing sites that use or have previously used hazardous materials, or that may contain contaminants in soils or groundwater in Santa Barbara, include large- and small-quantity generators of hazardous waste, such as gas stations, dry cleaners, and industrial uses. In addition, a substantial area of the downtown and waterfront regions of the City include lead-containing artificial fill material. Potential development facilitated by the Housing Plan may occur on these sites containing soil and groundwater contamination.

During the City's review of individual development applications, City staff would determine if a project site contains potential site contamination that requires remediation based on a review of information from the Central Coast RWQCB, DTSC, Santa Barbara County EHS, SBAPCD and information provided by the applicant. However, unknown contamination may also exist at sites eligible for housing under the Housing Plan resulting from a prior use of the site.

Oil of Gas Wells

Future residential development enabled under the Housing Plan could occur in areas that have been previously utilized for oil exploration and drilling in the Mesa Oil Field, thereby exposing additional persons to hazards associated with abandoned oil wells, sump material, and other anomalies. CalGEM has jurisdiction over historic oil and gas wells and may require property owners to implement measures to remediate wells that are leaking. If former well facilities and/or oil and gas pipelines are identified, compliance with the procedures and regulations of CalGEM developed pursuant to PRC Section 3208.1 would generally be required. CalGEM's Construction Site Plan Review Program assists local permitting agencies in identifying and reviewing the status of oil or gas wells located near or beneath proposed structures. The Construction Site Plan Review Program may issue a Well Review Letter to the local permitting agency (i.e., the City), and would provide the current status of all known oil and gas well facilities located on a property. Remedial plugging operations may be required in some cases where a known release has occurred. In the event that any unrecorded wells are uncovered during construction, CalGEM would be notified and remedial actions may be required.

Asbestos

Demolition of existing structures, particularly older structures prior to 1980, has the potential to expose workers and the public to asbestos containing materials or dust that contains asbestos. Several federal, state, and local regulations govern the handling and remediation of such materials, that would minimize the risk of a release or a hazard to the public or environment from exposure. The control of asbestos during demolition or renovation of buildings is regulated under the Federal Clean Air Act. The Federal Clean Air Act requires a thorough inspection for asbestos where demolition would occur and specifies construction work practices to control emissions, such as removing all asbestos-containing materials, adequately wetting all regulated asbestos-containing materials, sealing the material in leak tight containers and disposing of the asbestos-containing waste material as expediently as practicable (USEPA 2021). The California Health and Safety Code Section 19827.5 requires that local agencies not issue demolition or alteration permits until an

applicant has assessed the potential for a structure to contain asbestos and demonstrated compliance with notification requirements under federal regulations regarding hazardous air pollutants, including asbestos. Compliance with applicable standards related to demolition and asbestos is reviewed and monitored by City Building and Safety staff and SBAPCD.

Friable asbestos containing materials are regulated as a hazardous air pollutant under the Clean Air Act. As a construction worker safety hazard, they are also regulated under the authority of CalOSHA and SBCAPCD. In structures that would be demolished, any asbestos containing materials would be abated in accordance with State and Federal regulations prior to the start of demolition or renovation activities and in compliance with all applicable existing rules and regulations, including SBCAPCD. These programs would ensure that asbestos removal would not result in the release of hazardous materials to the environment that could impair human health.

Polychlorinated Biphenyls (PCBs)

Fluorescent lighting ballasts manufactured prior to 1978, and electrical transformers, capacitors, and generators manufactured prior to 1977, may contain PCBs. In accordance with the Toxic Substances Control Act and other federal and State regulations, individual projects would be required to properly handle and dispose of electrical equipment and lighting ballasts that contain PCBs during demolition of older buildings, ensuring that construction impacts related to hazardous materials, specifically PCBs, release would not result in a release into the environment.

In summary, new residential development facilitated by the Housing Plan may create a significant hazard through reasonably foreseeable release of hazardous materials into the environment. This impact would be potentially significant.

Mitigation Measures

HAZ-1 Environmental Site Assessment

The City of Santa Barbara Community Development Department shall develop regulatory guidelines and amend the City's Municipal Code to implement and enforce the following requirements:

The City shall require the preparation of a project-specific Phase I Environmental Site Assessment (ESA) in accordance with the American Society for Testing and Materials (ASTM) Standard Practice E 1527-13 or the Standards and Practices for All Appropriate Inquiry (AAI) for:

1. Any site listed on the State Water Board data management system (GeoTracker) or included on the Certified Unified Program Agencies (CUPA) program, including an open or closed leaking underground storage tank (LUST) case or other Cortese List site.
2. Any site located within the City's Potential Contaminated Fill Area that results in any of the following:
   - Demolition of existing structures;
   - Changes to an existing foundation;
   - New foundation; and/or
   - New stormwater infiltration basins.
   - Sites that have been exclusively used as single-family land use are excluded from the above requirement, unless otherwise recommended by an environmental oversight agency.

In instances where specific Recognized Environmental Conditions (RECs) are identified which may require further sampling, a qualified hazardous materials Environmental Professional with site characterization experience shall prepare a Phase II ESA. If the Phase II ESA reveals RECs, the Environmental Professional shall identify remedial activities controlled by federal, state, and local regulations.

HAZ-2 Inadvertent Discovery of Contamination

The City of Santa Barbara Community Development Department shall develop regulatory guidelines and amend the Municipal Code to implement and enforce the following requirements:

In the event that previously unknown or unidentified soil, soil vapor, and/or groundwater contamination could present a threat to human health or the environment is encountered during construction at a development site:

- Construction activities in the immediate vicinity of the contamination shall cease immediately.
- Following discovery, the contractor shall notify Santa Barbara County Public Health Department, Environmental Health Services (or other appropriate federal, state, or local regulatory oversight agency), and the City Environmental Analyst, immediately.
- A qualified environmental professional will be required to conduct an investigation to identify risks and describe measures to be taken to protect workers and the public from exposure to potential site hazards.

HAZ-3 Inadvertent Discovery of Oil or Gas Well

The City of Santa Barbara Community Development Department shall develop regulatory guidelines and amend the Municipal Code to implement and enforce the following requirements:

In the event that any unrecorded oil or gas wells are uncovered during excavation or grading:

- Construction activities in the immediate vicinity of the contamination shall cease immediately.
- The County Environmental Health Services, County Energy, Minerals & Compliance Division, and CalGEM shall be notified immediately to determine if remedial action may be required.
- Remedial actions recommended by these agencies shall be implemented by the developer and construction contractor.

If former well facilities and/or oil and gas pipelines are identified, compliance with the procedures and regulations of CalGEM developed pursuant to PRC Section 3208.1 would be required. Remedial plugging operations may be required.

Significance After Mitigation

Mitigation Measure HAZ-1 requires the preparation of a project-specific ESA prior to any demolition or construction activities. If unknown waste or suspect materials are discovered during construction activities, Mitigation Measure HAZ-2 and Mitigation Measure HAZ-3 would address notification and remediation requirements in compliance with all federal, state and local regulations. Mitigation Measures HAZ-2 and Mitigation Measure HAZ-3 would result in standard development conditions that would direct applicants to stop work and contact City staff and the appropriate regulatory agency in the case that site contamination is discovered during construction. With implementation of Mitigation Measures HAZ-1, HAZ-2, and HAZ-3, the Housing Plan would be mitigated to less than significant.

Threshold 3:	Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within a quarter mile of an existing or proposed school?

Impact HAZ-3 DEVELOPMENT FACILITATED BY THE HOUSING PLAN COULD OCCUR WITHIN 0.25 MILE OF A SCHOOL. HOWEVER, COMPLIANCE WITH LOCAL, STATE, AND FEDERAL REGULATIONS RELATED TO HAZARDOUS MATERIALS WOULD MINIMIZE THE RISK OF HAZARDOUS EMISSIONS OR EXPOSURE TO ACUTELY HAZARDOUS MATERIALS, SUBSTANCES, OR WASTE. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

The California Public Resources Code requires projects located within 0.25 mile of a school and might reasonably be expected to emit or handle hazardous materials to consult with the school district regarding potential hazards. There are approximately 17 schools in the city, operated by the Hope School District, Santa Barbara Unified School District, Cold Spring School District, and Montecito Union School District. Development forecasted in accordance with the Housing Plan may occur within 0.25 mile of a school; however, residential uses would not involve the use or transport of large quantities of hazardous materials. Any transport of hazardous materials would be required to comply with applicable regulations for the use, transport, and disposal of hazardous materials. Any development forecasted in accordance with the Housing Plan which would be reasonably anticipated to emit hazardous air emissions or would handle a hazardous substance within 0.25-mile of an existing school would be required to notify the affected school district, pursuant to Public Resources Code Section 21151.4. Furthermore, forecasted residential development in proximity to a school, such as development of La Cumbre Plaza, is anticipated to require project-level discretionary approval and project-specific environmental review whereby potential impacts associated with hazardous materials in proximity to schools would be evaluated and mitigated, if required. Compliance with existing regulations would reduce potential exposure hazards and impacts would be less than significant.

Mitigation Measures

No mitigation measures are required.

Threshold 4:	Would the project be located on a site that is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Impact HAZ-4 DEVELOPMENT FACILITATED BY THE HOUSING PLAN COULD RESULT IN DEVELOPMENT ON CORTESE LIST SITES. IMPACTS RELATED TO DEVELOPMENT ON A CORTESE LIST SITE WOULD BE LESS THAN SIGNIFICANT IMPACT WITH MITIGATION.

Development facilitated by the Housing Plan could occur on sites included on a list compiled pursuant to Government Code Section 65962.5, otherwise known as the Cortese List. As described in Section 4.6.1, there are approximately 268 open and closed LUST sites within the city. In addition, other Cortese List sites include 22 CDO and CAO sites, and one hazardous waste site (refer to Table 4.6-1). Many of these sites are concentrated in the downtown, waterfront area, and upper State Street corridor, where residential uses under the Housing Plan would be prioritized. As such, residential development forecasted in the Housing Plan may occur on Cortese List sites. Disturbance of these sites and materials during construction may result in the exposure of contaminants or hazardous materials to site workers, residents, or neighboring uses including schools or other residential uses. Further, Cortese List sites may have residual contamination that could affect new

residential land uses. Without site specific assessments, contamination could be released into the environment or, upon future occupation, cause a hazard to the public due to exposure to hazardous materials above the applicable regulatory exposure limits.

Existing federal, state, and local regulations and requirements enforced by regulatory agencies and the Certified Unified Planning Agency (CUPA), generally address remediation for sites listed on the Cortese List. Santa Barbara County EHS is certified by the California Environmental Protection Agency as the CUPA for Santa Barbara and ensures compliance with applicable laws and regulations. Development and remediation of LUST sites is overseen by the RWQCB. Generally, the agency responsible for oversight would determine the types of remediation and cleanup actions required. This may include excavation and off-haul of contaminated soils, installation of vapor barriers beneath habitable structures, continuous monitoring wells onsite with annual reporting requirements, or other mechanisms to ensure the site does not pose a health risk to workers or future occupants. However, not all potential housing sites within the city have been investigated for the presence of hazardous materials or presence on the Cortese List. Therefore, impacts would be potentially significant.

Mitigation Measures

Implement Mitigation Measure HAZ-1.

Significance After Mitigation

Mitigation Measure HAZ-1 would minimize potential impacts associated with the development of sites listed on the Cortese List. Mitigation Measure HAZ-1 requires the preparation of a project-specific Phase I ESA for any site listed on the State Water Board data management system (GeoTracker) or included on the CUPA program, including an open or closed LUST case, and any site located within the City's Potential Contaminated Fill Area. As part of the City's review process for individual development applications, staff would screen projects to determine whether a project site is listed on the Cortese List. If a project contains a LUST case or other Cortese site listing, a Phase I Report would be required. If Recognized Environmental Conditions are found on the potential project site, the City would notify the applicant and coordinate with the appropriate oversight agency to ensure that the applicant brings the site to regulatory compliance. Additionally, project sites would be reviewed on a case-by-case basis to identify any site-specific measures needed to address impacts related to development on Cortese List sites. With implementation of Mitigation Measure HAZ-1, the Housing Plan would be mitigated to a level of less than significant.

Threshold 5:	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?

Impact HAZ-5 COMPLIANCE WITH LOCAL, STATE AND FEDERAL REGULATIONS WOULD MINIMIZE SAFETY HAZARDS AS RESIDENTIAL DEVELOPMENT WOULD NOT OCCUR WITHIN AN AIRPORT SAFETY ZONE OR AIRPORT NOISE CONTOUR. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

The City operates the Santa Barbara Airport, located in the Goleta area, approximately four miles west of the City proper. The Airport is within the City's jurisdiction, and City-designated land use and zoning patterns apply to the approximate 950-acre property. Airport zoning, defined by Title 29 of the City of Santa Barbara Municipal Code, restricts residential development within the Airport

property and immediate vicinity (City of Santa Barbara 2021b, City of Santa Barbara 2003). Residential development resulting from the City of Santa Barbara's Housing Plan would not occur within an Airport Safety Zone or Airport Noise Contour, as defined by the Santa Barbara County Association of Governments (SBCAG) (SBCAG 2012). Specific projects that may affect navigable airspace would be subject to Federal Aviation Administration review, pursuant to the Code of Federal Regulations, Parts 77.5, 77.7, and 77.9.

As discussed in Section 4.12, *Effects Found Not to be Significant*, although aircraft overflights have the potential to expose people residing or working in the city to aircraft noise, this intermittent and temporary noise disturbance is present under existing conditions, and implementation of the Housing Plan would not exacerbate or increase aviation related noise levels. The Santa Barbara Airport's 65 dBA CNEL noise contour extends approximately 3,000 feet to the east of the airport but remains outside of the City's boundaries (Santa Barbara 2010). Therefore, the Housing Plan would not expose people residing or working in the area to excessive noise levels. This impact would be less than significant.

Mitigation Measures

No mitigation measures are required.

Threshold 6:	Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Impact HAZ-6 DEVELOPMENT FACILITATED BY THE HOUSING PLAN WOULD NOT RESULT IN CHANGES TO EMERGENCY EVACUATION ROUTES NOR WOULD IT SUBSTANTIALLY INCREASE ROADWAY CONGESTION SUCH THAT THE USE OF AN EVACUATION ROUTE WOULD BE HINDERED. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Increased housing development density in accordance with the Housing Plan could result in additional traffic congestion on local roadways. Multiple guidance documents, including the City's Emergency Operations Plan (2021), Tsunami Response Plan (2012), and the County's Multi-Jurisdictional Hazard Mitigation Plan (2023) provide guidance during unique situations requiring an unusual or extraordinary response, including traffic control and management. Implementation of these plans involve coordination with all facilities and personnel of City and County government, along with the jurisdictional resources within the County, into an efficient organization capable of responding to any emergency using a Standard Emergency Management System, mutual aid, and other appropriate response procedures (City of Santa Barbara 2021b, City of Santa Barbara 2012, County of Santa Barbara 2023b).

Construction activities associated with development forecasted in accordance with the Housing Plan could interfere with adopted emergency response or evacuation plans as a result of temporary construction activities within rights-of-way, due to temporary construction barricades or other obstructions that could impede emergency access. Projects facilitated by the Housing Plan would be evaluated on a project-by-project basis to determine if construction would impede emergency access. Standard development conditions of approval typically require projects to stage construction equipment onsite and establish construction truck haul routes, or otherwise implement a Construction Management Plan to facilitate circulation and access during construction. Any temporary construction barricades or other obstructions that could impede emergency access would require a Public Works Permit and may be subject to the standards set forth in the California Manual of Uniform Traffic Control Devices (Manual) (Caltrans 2021). The Public Works Encroachment Permit requires the creation and approval of temporary traffic control plans to be

used for facilitating road users through a work zone. Adherence to the requirements of standard development conditions and/or a Public Works Permit for all construction activity would minimize potential impacts associated with the impairment or physical interference of an adopted emergency response plan or evacuation procedures for State highways. Future development forecasted in accordance with the Housing Plan would be reviewed by the Santa Barbara City Fire Department to ensure consistency with emergency access requirements. Infrastructural improvements that involve work in the public right-of-way would require an Encroachment Permit and would be subject to applicable City requirements to ensure appropriate traffic control, pursuant to the Santa Barbara Municipal Code Chapter 10.55. Additionally, as part of standard development procedures in the City, the City's Community Development Department, Fire Department, and Public Works Department must review proposed development to ensure that all new development would have adequate emergency access and escape routes in compliance with existing City and Fire Department regulations and pursuant to the regulations as set forth by the CWPP.

Large residential projects that require discretionary approval would require project-specific environmental review in which potential impacts associated with emergency response plans and emergency evacuation plans would be evaluated and mitigated, if required. Therefore, implementation of the Housing Plan would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, and this impact would be less than significant.

Mitigation Measures

No mitigation measures are required.

Threshold 7:	Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

Impact HAZ-7 DEVELOPMENT FACILITATED BY THE HOUSING PLAN THAT WOULD OCCUR WITHIN HIGH FIRE HAZARD AREAS WOULD BE REQUIRED TO COMPLY WITH LOCAL AND STATE REGULATIONS AND WOULD UNDERGO SITE-SPECIFIC DEVELOPMENT REVIEW. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

Development forecasted in accordance with the Housing Plan would prioritize residential mixed-use and infill development in proximity to existing transit and established transit priority areas which are mostly located outside of Santa Barbara's fire hazard areas. As discussed in Section 3, *Project Description,* the Housing Plan would prioritize development in locations zoned for multi-unit development and generally not within High Fire Hazard Areas.

Development forecasted in accordance with the Housing Plan would be subject to applicable State and local standards and project-specific environmental review that would ensure compliance with fire safety regulations. As forecasted in the Housing Plan, accessory dwelling units (ADUs), would be the most common type of housing project constructed within the City's High Fire Hazard Areas. Pursuant to the City of Santa Barbara's Municipal Code Sections 30.185.040 and 28.86.085, all ADUs located in High Fire Hazard Areas are required to be designed to meet high fire construction standards as determined by the Chief Building Official or the Fire Code Official. In addition, ADUs within a fire hazard area defined in the CWPP must meet High Fire Hazard Area Standards provided in Section 30.185.040(K).

Regarding multi-unit housing development, applicable housing development projects would be required to comply with General Plan, zoning, and subdivision standards and criteria, which include density limits. Although there is potential for a small number of housing sites in High Fire Hazard

Areas to be developed with multi-unit housing, these developments would adhere to the existing density limits and therefore would not encourage substantial residential growth within the city's fire hazard areas.

New development forecasted in accordance with the Housing Plan that would occur with a High Fire Hazard Area would be subject to several regulatory standards that would limit wildfire risk. This includes Title 14 of the California Code of Regulations, the City 2021 Community Wildfire Protection Plan (CWPP), Building Code requirements such as sprinklers, fuel modification requirements and defensible space, and project review by the City Fire Department. Compliance with applicable regulations and standards, which would be confirmed upon Fire Department review of individual projects, would minimize the risk associated with fires burning in defensible space areas (City of Santa Barbara 2020b).

The project would not exacerbate wildfire risks or the uncontrolled spread of a wildfire, and this impact would be less than significant.

Mitigation Measures

No mitigation measures are required.

4.6.4 Cumulative Impacts

Regional cumulative impacts consider City-wide impacts together with similar impacts of reasonably anticipated regional projects/programs including the City's Safety Element Update, Open Space Element Update, the City's State Street Master Plan, and the California Department of Transportation's (Caltrans') South Coast Highway 101 High-Occupancy Vehicle Lanes project. Cumulative projects also include planned and pending residential development projects that contribute to the City's RNHA. The general approach to cumulative impact analysis used in this Program EIR is discussed in Section 4, *Environmental Impact Analysis*.

Generally, exposure to hazardous materials may cause localized adverse effects. A combination of federal, state, and local regulations limit or minimize the potential for exposure to hazardous materials. The types and sizes of residential development anticipated in the City of Santa Barbara would not involve large quantities of hazardous materials or activities that transport or handle hazardous materials nor be sited on known hazardous materials sites. However, cumulative plans and projects may include demolition of structures that have the potential to contain hazardous building materials. Building materials may contain asbestos and lead-based paint. To address potential release of asbestos and lead-based paint, the City would require applicants to assess structures and impose standard procedures in accordance with State regulations (required testing, removal, and proper disposal) to minimize release prior to any demolition. Cumulative development could be located in areas that have previously been subject to soil and groundwater contamination, such as a Cortese List site, or in proximity to previously abandoned oil or gas wells. In the absence of City-specific requirements for hazardous material review or procedures for the inadvertent discovery of hazardous materials or oil wells, cumulative development could potentially result in cumulatively significant impacts related to hazardous material release. To address the potential release of hazardous materials, the Housing Plan would implement Mitigation Measures HAZ-1 through HAZ-3 which require developers to prepare project-specific Phase I ESAs in potentially hazardous areas and follow procedures in the event of the discovery of contamination or oil wells. With implementation of Mitigation Measures HAZ-1 through HAZ-3, the Housing Plan would not contribute considerably to cumulative impacts related to hazardous material release.

As part of project approval for the cumulative projects, the City would assess the need for fire protection services, which would inform efforts to improve or expand needed facilities. All cumulative development in the City would be required comply with emergency access requirements as directed by respective City and Fire Department regulations. Cumulative projects are not reasonably anticipated to result in permanent road closures, impede an established emergency or evacuation access route, or interfere with emergency response requirements established by the City's General Plan. Therefore, the cumulative impacts related to emergency response and evacuation plans consistency would be less than significant.

A combination of Federal, State, and local regulations limit or minimize the potential for exposure to wildfires by reducing the amount of development in wildland urban interface areas, ensuring new development is developed according to California Building Code and California Fire Code, and incorporating requirements for fire-safe construction into the land use planning. Cumulative development in the City may occur in designated High Fire Hazard Areas. However, project construction would adhere to respective city building and fire codes designed to provide minimum standards to increase fire-resiliency in buildings, prevent the occurrence of fires, and to provide adequate fire-protection facilities to control the spread of fire which might be caused by recreational, residential, commercial, industrial or other activities conducted in a wildland urban interface area. Adherence to the City's building code would ensure that California Fire Code standards including automatic sprinkler systems are incorporated into project design and permit requirements. Therefore, the cumulative impact related to wildfire exposure risk would be less than significant.

Compliance with the City's development standards regarding types of development allowed and maximum stories allowed would reduce potential cumulative project impacts related to aviation related hazards. Existing requirements for airports and existing local, State, and Federal regulations would also reduce the noise impacts of airport activity on residents and workers in the plan area. Therefore, the cumulative impact related to aviation-related hazards and excessive noise exposure would be less than significant.