

# ENERGY

## SUMMARY

The proposed project would not consume energy resources in a wasteful, inefficient, or unnecessary amount during project construction and/or operation.

The proposed project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency.

## ENVIRONMENTAL SETTING

### Regional Energy Supply

Electricity is provided to customers in Camarillo by Southern California Edison (SCE). SCE provides electric power to more than 14 million persons in 15 counties and in 180 incorporated cities, within a service area encompassing approximately 50,000 square miles. SCE derives electricity from varied energy resources including fossil fuels, hydroelectric generators, nuclear power plants, geothermal power plants, solar power generation, and wind farms. SCE also purchases from independent power producers and utilities, including out-of-state suppliers.

Table 5.5-1 shows the electricity consumption in the SCE service area in 2018, which is the latest data available from the California Energy Commission (CEC). As shown, customers within the SCE service area consumed approximately 85.3 billion kilowatt-hours (kWh) of electricity in 2018. Commercial building and residential uses are the two primary consumption sectors.

**TABLE 5.5-1 - ELECTRICITY CONSUMPTION IN THE SCE SERVICE AREA IN 2018**

Electricity Consumption in Million Kilowatt-hours							
Agriculture & Water Pump	Commercial Building	Commercial Other	Industry	Mining & Construction	Residential	Streetlight	Total Usage
3,192.21	31,573.78	4,367.39	13,391.63	2,390	29,865	496	85,276
3.74%	37.03%	5.12%	15.70%	2.80%	35.02%	0.58%	

Source of table data: California Energy Commission, Energy Consumption Data Management System, California Energy Consumption Database, interactive web tool.

Natural gas is provided to customers in Camarillo by the Southern California Gas Company (SCG). Most of the natural gas used in California comes from out-of-state natural gas basins. In 2012, California

customers received 35% of their natural gas supply from basins located in the Southwest, 16% from Canada, 40% from the Rocky Mountains, and 9% from basins located within California. SCG owns and operates several natural gas storage fields that are located in northern and southern California. These storage fields, and four independently owned storage utilities – Lodi Gas Storage, Wild Goose Storage, Central Valley Storage, and Gill Ranch Storage – help meet peak seasonal natural gas demand and allow California natural gas customers to secure natural gas supplies more efficiently.

Table 5.5-2 shows the electricity consumption in the SCG service area in 2018, which is the latest data available from the CEC. As shown, customers within the SCG service area consumed approximately 5.2 billion therms<sup>1</sup> of natural gas in 2018. Industry and residential uses are the two primary consumption sectors.

**TABLE 5.5-2 - NATURAL GAS CONSUMPTION IN THE SCG SERVICE AREA IN 2018**

Natural Gas Consumption in Million Therms						
Agriculture & Water Pump	Commercial Building	Commercial Other	Industry	Mining & Construction	Residential	Total Usage
77.61	912.98	74.52	1,714.36	229.22	2,147.39	5,156.08
1.51%	17.71%	1.45%	33.25%	4.45%	41.65%	

Source of table data: California Energy Commission, Energy Consumption Data Management System, California Energy Consumption Database, interactive web tool.

California’s on-road transportation system includes over 170,000 miles of highways and major roadways, more than 27 million passenger vehicles and light trucks, and almost eight million medium- and heavy-duty vehicles. While gasoline consumption has been declining since 2008, it is still by far the dominant fuel. Petroleum comprises about 92 percent of all transportation energy use, excluding fuel consumed for aviation and most marine vessels. Nearly 19 billion gallons of on-highway fuel are consumed each year, including 15.1 billion gallons of gasoline (including ethanol) and 3.9 billion gallons of diesel fuel (including biodiesel and renewable diesel). In 2016, Californians also used 194 million therms of natural gas as a transportation fuel, or the equivalent of 155 million gallons of gasoline.

The U.S. Energy Information Administration (EIA) is the statistical and analytical agency within the U.S. Department of Energy. The EIA conducts a comprehensive data collection program that covers the full spectrum of energy sources, end uses, and energy flows, and publishes that data for each state. The most recent “Quick Facts” published by the EIA for California state that:<sup>2</sup>

<sup>1</sup> A therm is a unit of heat energy equal to 1000,000 British thermal units (Btu). It is approximately the energy equivalent of burning 100 cubic feet of natural gas.

<sup>2</sup> U.S. Energy Information Administration. <https://www.eia.gov/state/index.php?sid=CA>, January 16, 2020.

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- California was the seventh-largest producer of crude oil among the 50 states in 2018, and, as of January 2019, it ranked third in oil refining capacity.
  - California is the largest consumer of jet fuel among the 50 states and accounted for one-fifth of the nation's jet fuel consumption in 2018.
  - California's total energy consumption is second-highest in the nation, but, in 2018, the state's per capita energy consumption was the fourth-lowest, due in part to its mild climate and its energy efficiency programs.
  - In 2018, California ranked first in the nation as a producer of electricity from solar, geothermal, and biomass resources and fourth in the nation in conventional hydroelectric power generation.
  - In 2018, large- and small-scale solar PV and solar thermal installations provided 19% of California's net electricity generation.

As indicated above, California is one of the nation's leading energy-producing states, and California per capita energy use is among the nation's most efficient.

## **Regulatory Setting**

### *California Regulations*

#### **Title 24**

California Code of Regulations (CCR) Title 24 Part 6: California's Energy Efficiency Standards for Residential and Nonresidential Buildings, was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. Since then, Title 24 has been amended with a recognition that energy-efficient buildings require less electricity and reduce fuel consumption. The current 2019 Title 24 standards (effective as of January 1, 2020) were adopted to respond, amongst other reasons, to the requirements of the California Global Warming Solutions Act of 2006 (Assembly Bill No. 32; California Health and Safety Code Division 25.5, Sections 38500, et seq., or AB 32). Specifically, new development projects constructed within California after January 1, 2020 are subject to the mandatory planning and design, energy efficiency, water efficiency and conservation, material conservation and resources efficiency, and environmental quality measures of the California Green Building Standards (CALGreen) Code (California Code of Regulations, Title 24, Part 11). The indoor and outdoor water use standards of the CALGreen Code are already addressed by the Camrosa Water District's Water Conservation Ordinance. Key provisions of the CALGreen Code that apply to the type of new residential and non-residential developments proposed for the project site are as follows:

#### Residential Uses

- Division 4.1 - Planning and Design

- Section 4.106 - Site Development
  - 4.106.4 Electric vehicle (EV) charging for new construction. New construction shall comply with Section 4.106.4.1, 4.106.4.2, or 4.106.4.3, to facilitate future installation and use of EV chargers. Electric vehicle supply equipment (EVSE) shall be installed in accordance with the California Electrical Code, Article 625.
  - 4.106.4.1 New one- and two-family dwellings and townhouses with attached garages. For each dwelling unit, install a listed raceway to accommodate a dedicated 208/240-volt branch circuit. The raceway shall not be less than trade size 1 (nominal 1-inch inside diameter). The raceway shall originate at the main service or sub panel and shall terminate into a listed cabinet, box or other enclosure in close proximity to the proposed location of an EV charger. Raceways are required to be continuous at enclosed, inaccessible or concealed areas and spaces. The service panel and/or sub panel shall provide capacity to install a 40-ampere minimum dedicated branch circuit and space(s) reserved to permit installation of a branch circuit overcurrent protective device.
- Division 4.4 - Material Conservation and Resource Efficiency
  - Section 4.408 - Construction Waste Reduction, Disposal and Recycling
    - 4.408.1 Construction waste management. Recycle and/or salvage for reuse a minimum of 65 percent of the nonhazardous construction and demolition waste in accordance with either Section 4.408.2, 4.408.3 or 4.408.4, or meet a more stringent local construction and demolition waste management ordinance.
    - 4.408.2 Construction waste management plan. Submit a construction waste management plan in conformance with Items 1 through 5. The construction waste management plan shall be updated as necessary and shall be available during construction for examination by the enforcing agency.
      1. Identify the construction and demolition waste materials to be diverted from disposal by recycling, reuse on the project or salvage for future use or sale.
      2. Specify if construction and demolition waste materials will be sorted on-site (source-separated) or bulk mixed (single stream).
      3. Identify diversion facilities where the construction and demolition waste material will be taken.
      4. Identify construction methods employed to reduce the amount of construction and demolition waste generated.

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5. Specify that the amount of construction and demolition waste materials diverted shall be calculated by weight or volume, or both.
- 4.408.3 Waste management company. Utilize a waste management company, approved by the enforcing agency, which can provide verifiable documentation that the percentage of construction and demolition waste material diverted from the landfill complies with Section 4.408.1.
  - 4.408.4 Waste stream reduction alternative. Projects that generate a total combined weight of construction and demolition waste disposed of in landfills which do not exceed 3.4 pounds per square foot of the building area, shall meet the minimum 65 percent construction waste reduction requirement in Section 4.408.1.
    - 4.408.4.1 Waste stream reduction alternative. Projects that generate a total combined weight of construction and demolition waste disposed of in landfills which do not exceed 2 pounds per square foot of the building area, shall meet the minimum 65 percent construction waste reduction requirement in Section 4.408.1.
- Section 4.410 - Building Maintenance and Operation
    - 4.410.1 Operation and maintenance manual. At the time of final inspection, a manual, compact disc, web-based reference or other media acceptable to the enforcing agency which includes all of the following shall be placed in the building:
      1. Directions to the owner or occupant that the manual shall remain with the building throughout the lifecycle of the structure.
      2. Operation and maintenance instructions for the following:
        - a. Equipment and appliances, including water saving devices and systems, HVAC systems, photovoltaic systems, electric vehicle chargers, water-heating systems and other major appliances and equipment.
        - c. Space conditioning systems, including condensers and air filters.
      3. Information from local utility, water and waste recovery providers on methods to reduce resource consumption, including recycle programs and locations.
      4. Public transportation and/or carpool options available in the area.
      9. Information about state solar energy and incentive programs available.
      10. A copy of all special inspection verifications required by the enforcing agency or this code.

Nonresidential Uses

- Division 5.1 - Planning and Design
  - Section 5.106 - Site Development
    - 5.106.12 Shade Trees. Shade trees shall be planted to comply with Sections 5.106.12.1, 5.106.12.2, and 5.106.12.3. Percentages shown shall be measured at noon on the summer solstice. Landscape irrigation necessary to establish and maintain tree health shall comply with Section 5.304.6.
      - 5.106.12.1 Surface parking areas. Shade tree plantings, minimum #10 container size or equal shall be installed to provide shade over 50 percent of the parking area within 15 years.
- Division 5.4 - Material Conservation and Resource Efficiency
  - Section 5.408 - Construction Waste Reduction, Disposal and Recycling
    - 5.408.1 Construction waste management. Recycle and/or salvage for reuse a minimum of 65 percent of the nonhazardous construction and demolition waste in accordance with either Section 5.408.1.1, 5.408.1.2 or 5.408.1.3; or meet a local construction and demolition waste management ordinance, whichever is more stringent.
      - 5.408.1.1 Construction waste management plan. Where a local jurisdiction does not have a construction and demolition waste management ordinance that is more stringent, submit a construction waste management plan that:
        1. Identifies the construction and demolition waste materials to be diverted from disposal by efficient useage, recycling, reuse on the project or salvage for future use or sale.
        2. Determines if construction and demolition waste materials will be sorted on-site (source-separated) or bulk mixed (single stream).
        3. Identifies diversion facilities where the construction and demolition waste material will be taken.
        4. Specifies that the amount of construction and demolition waste materials diverted shall be calculated by weight or volume, but not by both.
      - 5.408.1.2 Waste management company. Utilize a waste management company that can provide verifiable documentation that the percentage of construction and demolition waste material diverted from the landfill complies with this section.

- 5.408.1.3 Waste stream reduction alternative. The combined weight of new construction disposal that does not exceed two pounds per square foot of the building area, shall meet the minimum 65 percent minimum requirement as approved by the enforcing agency.
- 5.408.3 Excavated soil and land clearing debris. 100 percent of trees, stumps, rocks and associated vegetation and soils resulting primarily from land clearing shall be reused or recycled.
- Section 5.410 - Building Maintenance and Operation
  - 5.410.1 Recycling by occupants. Provide readily accessible areas that serve the entire building and are identified for the depositing, storage and collection of non-hazardous materials for recycling, including (at a minimum) paper, corrugated cardboard, glass, plastics, organic waste, and metals or meet a lawfully enacted local recycling ordinance, if more restrictive.

The California Energy Commission (CEC) anticipates that single-family homes built with the 2019 standards will use approximately 7% less energy compared to the residential homes built under the 2016 standards. Additionally, after implementation of solar photovoltaic systems, homes built under the 2019 standards will about 53% less energy than homes built under the 2016 standards. Nonresidential buildings will use approximately 30% less energy due to lighting upgrades.

#### **AB 1493 Pavley Regulations and Fuel Efficiency Standards**

California AB 1493, enacted on July 22, 2002, required the California Air Resources Board (ARB) to develop and adopt regulations that reduce greenhouse gases (GHGs) emitted by passenger vehicles and light duty trucks. Under this legislation, the ARB adopted regulations to reduce GHG emissions from non-commercial passenger vehicles (cars and light-duty trucks). Although specifically aimed at reducing GHG emissions, a co-benefit of the Pavley standards is an improvement in fuel efficiency and consequently a reduction in fuel consumption.

#### **California Renewable Portfolio Standards (SB 1078)**

First established in 2002 under Senate Bill (SB) 1078, California's Renewable Portfolio Standards (RPS) requires retail sellers of electric services to increase procurement from eligible renewable resources to 33 percent of total retail sales by 2020. In October 2015, the legislature approved, and the Governor signed SB 350, which reaffirms California's commitment to reducing its GHG emissions and addressing climate change. Key provisions include an increase in the renewables portfolio standard (RPS), higher energy efficiency requirements for buildings, initial strategies towards a regional electricity grid, and improved infrastructure for electric vehicle charging stations. Provisions for a 50 percent reduction in the use of petroleum statewide were removed from the Bill because of opposition and concern that it would prevent the Bill's passage. Specifically, SB 350 requires the following to reduce statewide GHG emissions:

- Increase the amount of electricity procured from renewable energy sources from 33 percent to 50 percent by 2030, with interim targets of 40 percent by 2024, and 25 percent by 2027.
- Double the energy efficiency in existing buildings by 2030. This target will be achieved through the California Public Utility Commission (CPUC), the CEC, and local publicly-owned utilities.

## **THRESHOLDS OF SIGNIFICANCE**

In accordance with Appendix G to the State CEQA Guidelines, a project could have a potentially significant energy impact if it would:

- Consume energy resources in a wasteful, inefficient, or unnecessary amount during project construction and/or operation.
- Conflict with or obstruct a State or local plan for renewable energy or energy efficiency.

In addition, Appendix F to the State CEQA Guidelines states that the means of achieving the goal of energy conservation includes the following:

- Decreasing overall per capita energy consumption.
- Decreasing reliance on fossil fuels such as coal, natural gas and oil; and
- Increasing reliance on renewable energy sources.

Pursuant to impact possibilities listed in Appendix F to the State CEQA Guidelines, environmental impacts associated with regard to energy consumption and conservation may include:

1. The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project including construction, operation, maintenance and/or removal;
2. The effects of the project on local and regional energy supplies and on requirements for additional capacity;
3. The effects of the project on peak and base period demands for electricity and other forms of energy;
4. The degree to which the project complies with existing energy standards;
5. The effects of the project on energy resources;
6. The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

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## PROJECT IMPACTS AND MITIGATION MEASURES

### Energy Consumption

**Threshold:** Would the proposed project consume energy resources in a wasteful, inefficient, or unnecessary amount during project construction and/or operation?

**Impact:** The proposed project would not consume energy resources in a wasteful, inefficient, or unnecessary amount during project construction and/or operation.

#### *Impact Analysis*

Implementation of the proposed project would result in the consumption for energy resources during both construction and long-term operation. In both cases, all energy demand would be subject to all statewide regulations for the purchase and use of fuels, equipment, vehicles, and appliances.

The evaluation in this section utilizes the assumptions and results presented in the California Emissions Estimator Model (CalEEMod v. 2016.3.2) results sheets for the Greenhouse Gas Emissions section of this EIR and provided in Appendix M to this EIR. Additional calculations were conducted for this analysis since CalEEMod does not display the amount and fuel type for construction-related sources. These calculations are provided in Appendix K to this EIR.

As stated previously, Appendix F to the State CEQA Guidelines provides for assessing potential impacts that a project could have on energy supplies, focusing on the goal of conserving energy by ensuring that projects use energy wisely and efficiently. The analysis below addresses each of these potential energy impacts identified in State CEQA Guidelines Appendix F.

#### **The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project including construction, operation, maintenance and/or removal**

##### *Construction Energy Demands*

Project construction would require the use of construction equipment for grading, hauling, and building activities, as well as construction workers and vendors traveling to and from the project site. Construction equipment requires diesel as the fuel source.

Fuel consumption from on-site heavy-duty construction equipment was calculated based on the equipment mix and usage factors provided in the CalEEMod output files. The total horsepower was then multiplied by rate of 0.05 gallon of diesel usage per horsepower-hour based on Table A9-3-E of the South Coast Air Quality Management District's CEQA Air Quality Handbook. Fuel consumption from construction worker and vendor/delivery trucks was calculated using the trip rates and distances provided in the CalEEMod output files. Total vehicle miles traveled (VMT) was then calculated for each type of construction-related trip and divided by the corresponding county-specific miles per gallon factor

using ARB's EMFAC 2017 model. EMFAC 2017 provides the total annual VMT and fuel consumed for each vehicle type. Consistent with CalEEMod, construction worker trips were assumed to include light duty automobiles and light duty trucks. Construction vendor trucks were assumed to be medium-duty and heavy-duty trucks. The construction fuel consumption calculations are provided in Appendix K of this EIR and are summarized in Table 5.5-3.

**TABLE 5.5-3 - ESTIMATED CONSTRUCTION FUEL CONSUMPTION**

Construction Fuel Demand Source	Total Fuel Consumption (gallons)
Construction Equipment	410,296
Construction Worker Trips	98,108
Construction Vendor Trips	13,108
Total Construction Fuel Demand	521,512

Construction phase fuel consumption calculation sheets are provided in Appendix K.

As shown in Table 5.5-1, a total of approximately 521,512 gallons of fuel would be consumed throughout the construction of the proposed project. Fuel energy consumed during construction would be temporary in nature and would not represent a significant demand on energy resources. There are no unusual project characteristics or construction processes that would require the use of equipment that would be more energy intensive than is used for comparable activities; or equipment that would not conform to current emissions standards (and related fuel efficiencies). Equipment employed in construction of the project would therefore not result in inefficient wasteful, or unnecessary consumption of fuel.

Construction equipment is also required to comply with regulations limiting idling to five minutes or less (CCR Title 13 §2449(d)(3)). Compliance with anti-idling regulations results in a more efficient use of construction-related energy and the minimization or elimination of wasteful or unnecessary consumption of fuel.

Indirectly, construction energy efficiencies and energy conservation would also be achieved for the proposed development through energy efficiencies realized from bulk purchase, transport, and use of construction materials.

### *Operational Energy Demands*

For operational activities, annual electricity and natural gas consumption were calculated using demand factors provided on pages 42 and 44 of the CalEEMod output as part of the GHG analysis in the Greenhouse Gas Emissions, section of this EIR. CalEEMod estimates the project's electricity demand to be

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approximately 991,364 kWh (approximately one million kWh) per year and the natural gas consumptions to be approximately 2,625,460 kilo-British thermal units (kBTUs) or approximately 26,255 therms.<sup>3</sup>

The fuel consumption from the traffic generated by the project was calculated using the annual VMT total provided in the CalEEMod output files divided by the percentage of each vehicle class and multiplied by the average fuel economy for each vehicle class using EMFAC 2017. The operational fuel consumption calculations provided estimate that project vehicle trips would consume approximately 73,033 gallons of fuel per year.

The project would promote building energy efficiency through compliance with all applicable energy efficiency standards of Title 24 and the CALGreen Code that are in affect at the time of project development. The project also reduces potential vehicle fuel usage due to compliance with regulatory programs and its location that reduce VMT (see the Transportation section of this EIR). AB 1493 ("the Pavley Standard") requires reductions in GHG emissions from non-commercial passenger vehicles and light-duty trucks of model year 2009 and thereafter. The Advanced Clean Cars program, introduced in 2012, combines the control of smog, soot causing pollutants and greenhouse gas emissions into a single coordinated package of requirements for model years 2017 through 2025.

While the project would result in the consumption of energy resources, the use of these resources would not occur in a wasteful, inefficient, or unnecessary amount. The City of Camarillo, as lead agency, considers the energy impacts associated with projects that comply with the applicable provisions of Title 24 Part 6 and the CalGreen Code for building construction to be less than significant.<sup>4</sup>

#### **The effects of the project on local and regional energy supplies and on requirements for additional capacity**

As discussed previously, customers within the SCE service area consumed approximately 85.3 billion kilowatt-hours (kWh) of electricity in 2018 while customers within the SCG service area consumed approximately 5.2 billion therms of natural gas in 2018. The annual electricity demand of the proposed project (approximately 991,364 kWh) represents a 0.00116% increase in the demand for electricity. The annual natural gas demand of the proposed project (approximately 26,255 therms) represents a 0.000504% increase in the demand for natural gas. These resources as well as fuel for vehicles is currently not limited in quantities for consumer consumption and additional capacity would not be required to accommodate the demands of the project.

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<sup>3</sup> These are the mitigated amounts that represent compliance with the energy efficiency requirements of Title 24 and the CalGreen Code.

<sup>4</sup> City of Camarillo, City of Camarillo Environmental Guidelines, May 2020.

### **The effects of the project on peak and base period demands for electricity and other forms of energy**

As described above, the electricity demand of the project represents a 0.00116% increase in the demand for SCE electricity consumption. This is a negligible increase that would not have an adverse affect on energy supplies.

With regard to peak hour demands, purveyors of energy resources, including SCE, have established long standing energy conservation programs to encourage consumers to adopt energy conservation habits and reduce energy consumption during peak demand periods. The proposed project supports these efforts through compliance with Title 24 and the CALGreen Code that will not only reduce energy consumption during peak hour demands, but also during the base period. To this end, the proposed project will not substantially affect peak and base period demands for electricity or other forms of energy.

### **The degree to which the project complies with existing energy standards**

As discussed previously, the project would promote building energy efficiency through compliance with all applicable energy efficiency standards of Title 24 and the CALGreen Code that are in affect at the time of project development. The project also reduces potential vehicle fuel usage due to compliance with regulatory programs and its location that reduce VMT. AB 1493 ("the Pavley Standard") requires reductions in GHG emissions from non-commercial passenger vehicles and light-duty trucks of model year 2009 and thereafter. The Advanced Clean Cars program, introduced in 2012, combines the control of smog, soot causing pollutants and greenhouse gas emissions into a single coordinated package of requirements for model years 2017 through 2025.

### **The effects of the project on energy resources**

The effects of the project on energy supplies and resources from a capacity standpoint are described above in the preceding analyses. While the project would result in the consumption of energy resources, the use of these resources would not occur in a wasteful, inefficient, or unnecessary amount. The City of Camarillo, as lead agency, considers the energy impacts associated with projects that comply with the applicable provisions of Title 24 Part 6 and the CalGreen Code for building construction to be less than significant.

### **The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives**

As stated above, energy impacts associated with transportation during construction and operation of the project would not result in the inefficient, unnecessary, or wasteful consumption of energy. Further, the project also reduces potential vehicle fuel usage due to compliance with regulatory programs and its location that reduce VMT (see the Transportation section of this EIR).

## Energy Efficiency

**Threshold:** Would the proposed project conflict with or obstruct a State or local plan for renewable energy or energy efficiency?

**Impact:** The proposed project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency.

### *Impact Analysis*

There are currently no adopted State or local plans for renewable energy that are applicable to the proposed project. As discussed above, the construction and operational activities would be subject to the applicable energy efficiency requirements of Title 24 Part 6 and the CalGreen Code that are in effect at the time of development. As such, the project would not conflict with such plans, and no impact would occur.

## CUMULATIVE IMPACTS

Project construction and operation would not result in the inefficient, wasteful or unnecessary consumption of energy. Further, the energy demands of the project can be accommodated within the context of available resources and energy delivery systems. The project would not engage in wasteful or inefficient uses of energy and aims to achieve energy conservation goals within the State of California. Other cumulative developments within the City and the region would similarly be required to demonstrate that the wasteful, inefficient, or unnecessary consumption of energy would not occur. Additionally, other cumulative developments would be subject to the same regulatory requirements as the proposed project, including compliance with Title 24 and the CalGreen Code, which would ensure that cumulative development does not result in the wasteful, inefficient, or unnecessary consumption of energy. As such, the proposed project would not result in a potentially cumulatively-considerable environmental impact due to wasteful, inefficient, or unnecessary consumption of energy. Thus, impacts would not be cumulatively considerable.

## UNAVOIDABLE SIGNIFICANT IMPACTS

The proposed project would not create any unavoidable significant energy impacts.

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