

O-4 Save Our Community

- O-4-1** The commenter thanks the County for considering the comments on the Preliminary Geotechnical Report. The County acknowledges the comment as an introduction to comments that follow. The County notes the does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. This comment is included in the Final EIR for review and consideration by the decision-makers prior to a final decision on the project. No further response is required or necessary.
- O-4-2** The commenter states that Section 7 consultation with the U.S. Fish and Wildlife Service and California Department of Fish and Wildlife is required prior to the EIR. The commenter also inquires if there would be any gnatcatchers affected by the project.

Related to the question of impacts to coastal California gnatcatcher, the Draft EIR states the following (Section 2.4, Biological Resources):

Potential permanent direct impacts to coastal California gnatcatcher would include the loss of suitable nesting and foraging habitat (56.7 acres), and replacement with residential, commercial, recreational, and infrastructure uses (Tables 2.4-13 and 2.4-14). Permanent direct impacts to suitable foraging and nesting habitats would be significant (Impact W-2).

Regarding Section 7 consultation, this is not required prior to approval of an EIR. In the event that the Draft North County Multiple Species Conservation Program Plan is not approved prior to the proposed project moving forward, the proposed project would be required to obtain approval for the loss of coastal sage scrub and any associated incidental take of coastal California gnatcatcher through the County's Special 4(d) Habitat Loss Permit (HLP) Rule. To do so, the proposed project must demonstrate conformance with overall programmatic goals and policies established for the San Diego County Natural Community Conservation Planning program subregion, and make the specific findings applicable to issuance an HLP. A Draft HLP, including 4(d) findings, is included as Appendix E to the project's Biological Resources Technical Report, Draft EIR Appendix H. The proposed project may also obtain "take" authorization through Section 7 consultation with the U.S. Fish and Wildlife Service. The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project. No further response is required or necessary.

- O-4-3** The commenter states that the current California Building Code (CBC) is 2016 and not the 2013 version, and that there have been major changes since the 2013 version. The County agrees that the current version of the CBC is the 2016 version, and

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acknowledges that the project would be subject to the most recent version of the CBC upon constructing the project. The EIR has been revised to update this reference, but this change does not affect the Draft EIR's analysis. To the contrary, since single-family homes built to the 2016 standards will use approximately 28 percent less energy for lighting, heating, cooling, ventilation, and water heating than those built to the 2013 standards,¹⁹⁴ the Draft EIR conservatively estimates project impacts by relying on the 2013 standards.

O-4-4 The comment states that the American Society of Civil Engineers (ASCE) 7-10 standard should be considered, not ASCE 7-5, and that the ASCE 7-16 and the Federal Emergency Management Agency's National Earthquake Hazards Reduction Program (NEHRP) 2015 should be a current standard of practice. The County agrees that the current version is ASCE 7-10, which adopts the 2015 NEHRP provisions by reference. The EIR has been revised to update this reference; however, this change does not affect the analysis. The County acknowledges that the project would be subject to the most recent version of the CBC—which is based on the ASCE Minimum Design Standards—upon construction of the project.

O-4-5 The comment states that, "SHMA [Seismic Hazards Mapping Act] may not be mapped however, SP-117-A must be considered a standard of professional practice if liquefaction, landslides, or strong ground shaking is relevant." The County assumes that "SP-117-A" is a reference to Special Publication 117 of the California Geological Survey's (CGS) Guidelines for Evaluating and Mitigating Seismic Hazards in California. As stated in Section 2.6, Geology, Soils, and Seismicity, of the Draft EIR (page 2.6-6):

Evaluation and mitigation of potential risks from seismic hazards within zones of required investigation must be conducted in accordance with the CGS Special Publication 117A, adopted March 13, 1997, by the State Mining and Geology Board as updated in 2008.

Therefore, the Draft EIR already takes CGS Special Publication 117A into consideration.

O-4-6 The comment asks if Seismic Zone 4 is still relevant. As stated in Section 2.6 of the Draft EIR (page 2.6-11):

For the purposes of this EIR, the County's Geologic Hazards Guidelines (County of San Diego 2007a) apply to both the direct impact analysis and the

¹⁹⁴ 2016 Building Energy Efficiency Standards, Frequently Asked Questions. Accessed March 13, 2018. http://www.energy.ca.gov/title24/2016standards/rulemaking/documents/2016_Building_Energy_Efficiency_Standards_FAQ.pdf.

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cumulative impact analysis. These significance guidelines have been developed by the County to address question VI (a)(ii) in the CEQA Guidelines, Appendix G. A significant impact would result if:

- The project would be located within a County Near-Source Shaking Zone or within Seismic Zone 4 and the project does not conform to the Uniform Building Code.

Pursuant to the County's Guidelines for Determining Significance, Geologic Hazards, page 3, "All of San Diego County is located within Seismic Zone 4 ... and like most of Southern California, is subject to ground shaking." The Draft EIR thus discloses that the project Site is considered to lie within a seismically active region (Draft EIR page 2.6-11). However, because the project would be required to comply with state and local building and grading standards, substantial adverse impacts from strong seismic ground shaking would be avoided or reduced to acceptable levels. Potential adverse impacts from strong seismic ground shaking would, therefore, be less than significant (Draft EIR page 2.6-12).

O-4-7 The comment states that "critical periods" must be provided for all critical structures such as water tanks, and all forces of those periods should be provided. It is not clear what the commenter means by "critical periods," nor does the commenter explain why this is required. Therefore, no further response can be provided.

O-4-8 The comment states that the Whittier–Elsinore Fault, when considering multiple segments, has a maximum magnitude event of 7.85 M_w . The County acknowledges the comment and notes that the Whittier–Elsinore Fault was not considered in the analysis because it would not have the most significant effect at the project Site from a design standpoint. See Draft EIR page 2.6-11 for a discussion about how the Site is not located within an Earthquake Fault Zone; that no known active, potentially active, or inactive faults transect the project Site; and that the nearest active regional fault is the Elsinore–Julian Fault, 12 miles east of the Site (maximum magnitude event 7.1 M_w). The comment does not raise any specific issue regarding the analysis contained in the Draft EIR, and, therefore, no more specific response can be provided or is required. The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project.

O-4-9 The comment states, "this number for landslides, retaining wall dynamic analysis, water tanks, and distribution used for fire and other essential services, cell towers, etc." It is not clear what this comment is addressing. If the comment is referring to the 7.85 M_w reference in the previous comment, the commenter is referred to **Response to Comment O-4-8**. The comment does not raise any specific issue regarding the analysis contained in the Draft EIR, and, therefore, no more specific response can be

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provided or is required. The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project.

O-4-10 The comment states that “the CBC prescribes minimum standards.” It is not clear what this comment is addressing. **Response to Comment O-4-3** generally addresses CBC standards. This comment does not raise any specific issue regarding the analysis contained in the Draft EIR, and, therefore, no more specific response can be provided or is required. The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project.

O-4-11 The comment states that a site-specific study is required, that mapped or computer web data is inadequate, and that vertical acceleration and velocities must be provided.

It is not clear what this comment is addressing. However, the commenter is directed to Appendix J, Preliminary Geotechnical Investigation, of the Draft EIR, which provides additional details about seismicity and faulting. The comment addresses general subject areas that received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project.

O-4-12 The comment states that a SHMA level geotechnical report must be completed prior to project approval, and must be disclosed as part of the Draft EIR. A geotechnical report has been prepared by a geotechnical engineer. The commenter is directed to Appendix J, which provides additional details about seismicity and faulting. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project.

O-4-13 The comment states that there is not enough information to substantiate a less-than-significant finding. This comment is general in nature and does not raise any specific issue regarding any particular analysis in the Draft EIR. Therefore, no specific response can be provided or is required (*Paulek v. California Dept. Water Resources* (2014) 231 Cal.App.4th 35, 47 [a general response is all that is required to a general comment]). This comment is included in the Final EIR for review and consideration by the decision-makers prior to a final decision on the project.

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Nonetheless, the County does not concur with this comment. The Draft EIR indicated that the proposed project may result in potentially significant impacts relative to geology, soils, and seismicity (Draft EIR Section 2.6.3). However, as discussed in Section 2.6.5 of the Draft EIR, the project would incorporate mitigation measures M-GE-1 through M-GE-6 to reduce those potentially significant impacts to less than significant. As concluded in Section 2.6.7:

The potential for liquefaction in saturated alluvial soils (**Impact GE-1**) would be mitigated to less than significant with implementation of mitigation measure M-GE-1. Mitigation is achieved through the removal and replacement of alluvium with compacted fills in areas of proposed grading in accordance with geotechnical recommendations.

Natural slopes at the site containing local areas of potential surficial instability, as indicated by the presence of slopewash deposits, source area scars, and perched granitic boulder outcrops (**Impact GE-2**), would be mitigated to less than significant with implementation of mitigation measure M-GE-2. Mitigation is achieved through buffering areas without structural development, construction debris walls, catchment basins, or slope buttressing.

Cut slopes that have the potential to be subject to surficial instability (**Impact GE-3**) would be mitigated to less than significant with implementation of mitigation measure M-GE-3. Mitigation for this impact requires mapping of all cut slopes and stabilization if necessary.

Locations on site where rocks appear to have a potential to become dislodged (**Impact GE-4**) would be mitigated to less than significant with implementation of mitigation measure M-GE-4. Mitigation is achieved through boulder removal or breaking the boulder in place.

Impacts associated with potentially compressible soils (**Impact GE-5**) is mitigated to less than significant with implementation of mitigation measure M-GE-5, which requires geotechnical observation and/or laboratory testing during grading to determine areas of highly expansive soils.

With implementation of mitigation measures, all identified impacts would be reduced to below a level of significance.

O-4-14 The comment states that the Draft EIR is deficient because there is no report showing long duration shaking from the San Andreas Fault, San Jacinto Fault, or Rose Canyon

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Newport Inglewood Fault. The County does not concur with this comment. Appendix J-1 of the Draft EIR states the following (page 15):

Severe ground shaking is most likely to occur during an earthquake on one of the regional active faults in Southern California. The effect of seismic shaking may be mitigated by adhering to the California Building Code or state-of-the-art seismic design parameters of the Structural Engineers Association of California.

Therefore, the County does not find it necessary to describe the long period or long duration shaking from the San Andreas Fault, San Jacinto Fault, or Rose Canyon Newport Inglewood Fault. No further response is required or necessary.

- O-4-15** The comment states that “path effects” are not considered from the San Andreas Fault, San Jacinto Fault, Rose Canyon Newport Inglewood Fault, or Whittier–Elsinore Fault. The County does not concur with this comment. Please refer to **Responses to Comments O-4-14** and **O-4-8**. No further response is required or necessary.
- O-4-16** The comment states that the Southern California Earthquake Center Community Velocity model may be used. Please refer to **Responses to Comments O-4-8, O-4-14, and O-4-15**. The County acknowledges that the comment addresses general subject areas that received extensive analysis in Section 2.6, Geology, Soils, and Seismicity, of the Draft EIR. The comment does not raise any specific issue regarding that analysis, and, therefore, no more specific response can be provided or is required. The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the proposed project.
- O-4-17** The comment states that the Newport Inglewood Fault is now shown to connect to Rose Canyon Fault, and this is not considered in the Draft EIR. The County acknowledges this comment, but notes that this does not change the conclusion of the Draft EIR analysis. Please refer to **Responses to Comments O-4-8, O-4-14, and O-4-15**. The comment does not raise any specific issue regarding the analysis in Section 2.6, Geology, Soils, and Seismicity, and, therefore, no more specific response can be provided or is required. The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the proposed project.
- O-4-18** The comment states that San Diego State University Terrashake data and U.S. Geological Survey Shakeout data may be used. The County acknowledges this comment and notes that it does not raise any specific issue regarding the analysis, and, therefore, no more specific response can be provided or is required. The County

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will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the proposed project.

- O-4-19** The comment states that hillside and hilltop amplification must be considered. The County does not concur with this comment. Appendix J and Section 2.6 of the Draft EIR were prepared in accordance with County requirements relative to analysis for potential ground shaking and seismic impacts. Sections 2.6.3.1 and 2.6.3.2 analyze potential impacts and identify a less-than-significant impact. No further analysis is required, as suggested by the comment. The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the proposed project.
- O-4-20** The comment states that the Draft EIR should demonstrate that the project complies, not that it would comply at some future time. It is not clear what the commenter is specifically referring to. To the extent that this comment provides concluding remarks, please refer to the responses above. This comment is general in nature and does not raise any specific issue regarding any particular analysis in the Draft EIR. Therefore, no specific response can be provided or is required (*Paulek v. California Dept. Water Resources* (2014) 231 Cal.App.4th 35, 47 [a general response is all that is required to a general comment]). This comment is included in the Final EIR for review and consideration by the decision-makers prior to a final decision on the project.
- O-4-21** The comment states that the liquefaction analysis should include “long period” and “long duration” data. The County does not concur with the comment. Appendix J and Section 2.6 of the Draft EIR were prepared in accordance with County requirements relative to analysis for potential liquefaction impacts. Section 2.6.3.3 of the Draft EIR discussed potential for impacts from liquefaction consistent with the County’s Geologic Hazards Guidelines. Section 2.6.3 of the Draft EIR identified the potential for liquefaction impacts as Impact GE-1, and has proposed M-GE-1 to reduce this potentially significant impact to less than significant. No further analysis is required as suggested by the comment. The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the proposed project.
- O-4-22** The comment states that the landslides analysis must use “short period” and “short duration” events and “long period” and “long duration” events from stronger distant sources after adjusting for path effects. The County does not concur with this comment. Appendix J and Section 2.6 of the Draft EIR were prepared in accordance with County requirements relative to analysis for potential landslide impacts. Section 2.6.3.4 of the Draft EIR discusses the potential for impacts from landslides consistent

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with the County’s Geologic Hazards Guidelines. Section 2.6.3 of the Draft EIR identifies the potential for landslides as Impact GE-2 and Impact GE-3, and proposes M-GE-2 and M-GE-3 to reduce these potentially significant impacts to less than significant. No further analysis is required as suggested by the comment. The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the proposed project.

O-4-23 The comment states that dynamic analysis must be used. The County does not concur with this comment. Appendix J and Section 2.6 of the Draft EIR were prepared in accordance with County requirements. No further analysis is required, as suggested by the comment. The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the proposed project.

O-4-24 The comment recommends “gray water and stormwater best practices for recycle reuse and to reduce burden on [the] sewer system.” The County notes that the comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. Nevertheless, the County notes that PDF-26 requires that single-family homes be plumbed for grey water systems, subject to the County’s permitting requirements for grey water systems. The County acknowledges that the comment addresses general subject areas that received extensive analysis in Draft EIR Section 2.14, Utilities and Service Systems, and Section 3.2, Hydrology and Water Quality. This comment is included in the Final EIR for review and consideration by the decision-makers prior to a final decision on the project. No further response is required or necessary.

O-4-25 The comment states, “‘2.6.3.6 Soil Erosion’ should be ‘Loss of Topsoil and Soil Erosion.’” The County notes that the comment does not raise an issue related to the adequacy of the analysis in the Draft EIR. Please also see **Response to Comment O-4-26**, below. This comment is included in the Final EIR for review and consideration by the decision-makers prior to a final decision on the project. No further response is required or necessary.

O-4-26 The comment states that a loss of topsoil is not discussed, and that topsoil may be lost from grading. The County does not agree with this comment. Loss of topsoil is discussed in Section 2.6.3.6, Soil Erosion. For the commenter’s review, Section 2.6.3.6 states the following:

Most of the property is proposed as biological open space (approximately 1,209 acres of the 1,985-acre property) or fuel modification zone (272.2 acres). Within the development footprint, the potential for erosion would increase during grading and construction as a result of vehicles and heavy

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equipment accelerating the erosion process as exposed soil is subject to wind and water erosion due to rainfall.

Prior to project-related construction, a Stormwater Pollution Prevention Plan (SWPPP) would be prepared in accordance with the State Water Resources Control Board (SWRCB) Order No. 99-08-DWQ NPDES General Permit No. CAS00002 (Construction General Permit) and the modifications to the Construction General Permit Order No. 2001-046, adopted by the SWRCB. For coverage by the Construction General Permit, the Project Applicant is required to submit to the SWRCB a Notice of Intent (NOI) and develop a SWPPP describing best management practices (BMPs) to be used during and after construction. The BMPs would provide erosion and sedimentation control through measures such as silt fences, fiber rolls, gravel bags, temporary desilting basins, velocity check dams, temporary ditches or swales, storm water inlet protection, and soil stabilization measures such as erosion control mats, tackifier, hydroseeding and/or vegetation. The SWPPP would be required to be approved prior to the issuance of a grading permit.

The project is also required to comply with the County of San Diego Code of Regulations Title 8, Zoning and Land Use Regulations, Division 7, Sections 87.414 (DRAINAGE – EROSION PREVENTION) and 87.417 (PLANTING). Compliance with these regulations minimizes the potential for water and wind erosion.

The project design currently includes a Community-wide network of vegetated swales and bio-retention basins. These measures would also ensure maintenance of water quality in stormwater runoff, and are discussed in greater detail in Section 3.2, Hydrology and Water Quality, of this EIR, and in the Stormwater Management Plan (Appendix Y) and Preliminary Drainage Study (Appendix Z). Earth-disturbing activities associated with construction would be temporary and compliance with the General Construction Permit and BMPs outlined in the SWPPP, impacts related to soil erosion and the loss of topsoil would be **less than significant**.

- O-4-27** The comment states that topsoil must be banked and stockpiled for reuse. The County notes that the comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. This comment is included in the Final EIR for review and consideration by the decision-makers prior to a final decision on the project. No further response is required or necessary.
- O-4-28** The comment states that a CEG (Certified Engineering Geologist) and RGE (Registered Geotechnical Engineer) are required for mitigation. The County acknowledges the comment and notes that it expresses the opinion of the commenter.

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Section 6.0, Reporting Requirements, of the San Diego County Guidelines for Determining Significance, Geologic Hazards, states that “[a] California Certified Engineering Geologist shall complete” any reports required for a project (page 20), which is consistent with M-GE-2 (see Draft EIR page 2.6-21). The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project. No further response is required or necessary.

O-4-29 The comment states that M-GE-6 must be included in the Draft EIR, and the project must be approved without completion of the I-15 improvements by Caltrans.

In response, M-GE-6 *is* included in the Draft EIR. However, the Draft EIR clearly states that interchange improvements is a separate project under the lead jurisdiction of a separate agency (Caltrans), and will follow applicable process when the interchange design is complete. As noted in the introduction to Chapter 2, Significant Environmental Effects of the Proposed Project, of the Draft EIR:

Analysis of I-15 Interchange Improvements (Mitigation Measure M-TR-1)

Caltrans is the lead agency for the I-15 interchange improvements project. Accordingly, in a separate environmental review and approval process under CEQA and the National Environmental Policy Act (NEPA), Caltrans will analyze the I-15 interchange improvements, and whether the existing park-and-ride lots should be expanded, reconfigured, and/or enhanced to support transportation alternatives (e.g., ride-share, car-share, and transit). This EIR identifies the I-15 interchange improvements as a mitigation measure (see EIR Section 2.13, Transportation and Traffic, Mitigation Measure M-TR-1). Because the interchange improvements are a mitigation measure, this EIR discusses the potential environmental effects of the interchange improvements as required by CEQA (see CEQA Guidelines Section 15126.4(a)(1)(D)).

In addition, evaluating the Caltrans interchange improvements in terms of the project’s mitigation is appropriate because information concerning the interchange improvements is still under review and scoping through the Caltrans review process, including an assessment of alternatives to the interchange improvements, which will affect the intersection size, configuration, disturbance zones, and other features that are needed for an overall environmental analysis. Nonetheless, the Draft EIR endeavored to disclose all it reasonably can at this time regarding environmental effects associated with the interchange improvements.

Also, CEQA does not require that an EIR analyze impacts of mitigation measures to the same level as a project. As noted in Chapter 2 of the Draft EIR, “Because the

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- interchange improvements are a mitigation measure, this EIR discusses the potential environmental effects of the interchange improvements as required by CEQA (see CEQA Guidelines Section 15126.4(a)(1)(D)).” Thus, the Draft EIR discusses potential environmental effects of this interchange improvement mitigation measure, and adopts mitigation for its potential effects to the extent currently feasible.
- O-4-30** The comment states that Table 2.6-1 needs to be updated. The County acknowledges the comment as an introduction to the following comments. The County notes that the comment does not raise an issue related to the adequacy of the Draft EIR. This comment is included in the Final EIR for review and consideration by the decision-makers prior to a final decision on the project. No further response is required or necessary.
- O-4-31** The comment states that there are multiple segment breaks in Elsinore and Rose Canyon. The comment provides background information and does not raise an environmental issue within the meaning of CEQA. The County has considered the comment, and concluded that no changes are required to Table 2.6-1, as suggested by this comment and Comment O-4-30. The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project. No further response is required because the comment does not raise an environmental issue.
- O-4-32** The comment states that “San Jacinto and San Andreas [Faults should be] added using simulated seismograms (not simplistic AR, GPME, NGA, type methods which do not captures path effects).” The comment provides background information and does not raise an environmental issue within the meaning of CEQA. The County has considered the comment and concluded that no changes are required to Table 2.6-1 as suggested by this comment and Comment O-4-30. Please see also **Response to Comment O-4-14**, addressing that the effect of seismic shaking may be “mitigated by adhering to the California Building Code or state-of-the-art seismic design parameters of the Structural Engineers Association of California.” The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project. No further response is required because the comment does not raise an environmental issue.
- O-4-33** The comment provides additional mitigation measures for greenhouse gas emissions, which were included as part of another project (Newhall Ranch), and provides guidance from the State of California Attorney General. The comment states that the “COPP” would like to see these mitigation measures proposed for all projects. The comment states that the recommended mitigation measures do not include other

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California Air Resources Board or Air Quality Management District areas of responsibility.

The County has reviewed the information and does not believe that any additional mitigation measures are appropriate. As stated in Section 2.7, Greenhouse Gas Emissions, of the Draft EIR (page 2.7-52):

In this case, the project feasibly can achieve no net increase in GHG emissions through implementation of mitigation measures M-GHG-1 through M-GHG-3. Therefore, project would reduce all potentially significant impacts associated with GHG construction and operational emissions to a less than significant as compared to the existing environmental setting (see CEQA Guidelines section 15064.4(b)(1)).

Therefore, no additional mitigation measures are required to minimize impacts to less than significant.

Nonetheless, the County refers the commenter to mitigation measures M-GHG-1 through M-GHG-3, and the PDFs listed in the Draft EIR in Table 2.7-7, which have been designed to reduce the project's GHG emissions. A large number of the measures recommended by the commenter are, through these mitigation measures and design features, already incorporated into the project (e.g., TDM Program, offsetting GHG emissions, installation of solar). Further, where not separately incorporated, many of the mitigation recommendations, particularly from the referenced 2010 Attorney General document, have since been incorporated into the Building Energy Efficiency Standards in the California Building Standards Code, Title 24, Part 6¹⁹⁵ (e.g., use of energy efficient appliances, lighting, heating, and cooling). The project, therefore, already incorporates a number of the commenter's recommendations.

¹⁹⁵ 2016 Building Energy Efficiency Standards. Accessed March 13, 2018. <http://www.energy.ca.gov/title24/2016standards/>.