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Comment Received From: 25 Various Members Comments 3
Submitted On: 3/16/2023
Docket Number: 23-IEPR-01

2023 Scoping Order Please Include a Robust Land Use Analysis

Additional submitted attachment is included below.

From: [Chad Dyer](#)
To: [Energy - Docket Optical System](#)
Subject: 23-IEPR-01 2023 Scoping Order: Please Include a Robust Land Use Analysis
Date: Wednesday, March 15, 2023 5:36:50 PM

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Docket Unit Docket No. 23-IEPR-01 (Public Comment),

Thank you for the opportunity to comment on the 2023 IEPR Scoping Order. I am writing to express my deep concern that the draft Scoping Order NEVER ONCE mentions the need to sustainably solve our housing crisis, end car dependency, or build walkable, sustainable communities.

California is short about 2.5 million homes, according to our Regional Housing Needs Allocation. And in calling for a 25% reduction in driving by 2030, the 2022 Scoping Plan Update was crystal clear: "Zero-emission vehicles are not enough to solve the climate crisis."

The Scoping Plan Update adds: "More compact infill development generally generates lower emissions because attached building types and smaller residential unit sizes require fewer emissions to construct and less energy to heat and cool. Studies have estimated that infill development uses 10 to 20 percent less residential energy due to changes in unit types, sizes, and locations. Additional benefits include reduced heat island effects from paved surfaces like parking lots, which lowers long-term building energy use, and reduced emissions from the construction of infrastructure."

Building sustainable communities is also a matter of equity. The Scoping Plan Update is unequivocal: "Shifting California's development patterns and transportation systems is critical to address existing injustices by making livable, affordable homes with multi-modal connections to jobs, services, open space, and education available to all Californians, not just the white and the wealthy."

We simply cannot meet our state goals of equity, climate justice, and housing justice without building more infill housing, taking on sprawl, and driving dramatically less. Yes, renewable energy is essential, and so are heat pumps and electric cars - but they are not enough.

The Scoping Plan Update already calls on the state to do better on land use: "Plan and invest in a sustainable transportation system. [...] Manage the use of the transportation system to advance climate and equity goals. Consider policies to optimize the use of California's transportation infrastructure by prioritizing the movement of people over vehicles. [And improve] alignment of land use planning and development with climate and equity goals. Consider policies to accelerate infill development, affirmatively further fair housing, and increase natural and working lands protection, in furtherance of the State's planning priorities."

Even beyond questions of alignment with state goals, unless it considers housing policy, the

IEPR will not accurately or adequately model the range of energy outcomes in California. The state's housing stock has not kept up with historical population growth, and continued failure to build enough housing will surely lead to more displacement out of state – disproportionately people of color and lower income residents who cannot keep up with housing costs. Meanwhile, continuing to underproduce housing will mean (on average) an older, less efficient, and less electrified housing stock than would be predicted by assuming housing follows directly from population forecasts. The Energy Commission simply cannot accurately account for the state's demography and building stock – and thus energy and environmental outcomes – if it continues to treat housing policy and population as exogenous variables.

I call on the Energy Commission to align the 2023 IEPR Scoping Order with the state's own goals and with the direction already given in the 2022 Scoping Plan Update. In particular:

- The Scoping Order should include SB 375 in its list of relevant legislation.
- The IEPR Scoping Order should include a focus on building more infill housing in climate-resilient, high-opportunity areas near destinations as an essential element of equitable building energy efficiency and decarbonization, alongside electrification. Support for infill housing could include building code revisions, support for housing element development, zoning reform, and development of pre-approved, standardized building designs.
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Chad Dyer

From: [Jennifer Liu](#)
To: [Energy - Docket Optical System](#)
Subject: 23-IEPR-01 2023 Scoping Order: Please Include a Robust Land Use Analysis
Date: Wednesday, March 15, 2023 5:38:09 PM

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Jennifer Liu

From: [Ben Rosenthal](#)
To: [Energy - Docket Optical System](#)
Subject: 23-IEPR-01 2023 Scoping Order: Please Include a Robust Land Use Analysis
Date: Wednesday, March 15, 2023 5:41:35 PM

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From: [John Crahan](#)
To: [Energy - Docket Optical System](#)
Subject: 23-IEPR-01 2023 Scoping Order: Please Include a Robust Land Use Analysis
Date: Wednesday, March 15, 2023 5:41:46 PM

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John Crahan

From: [Richard Johnson](#)
To: [Energy - Docket Optical System](#)
Subject: 23-IEPR-01 2023 Scoping Order: Please Include a Robust Land Use Analysis
Date: Wednesday, March 15, 2023 5:44:47 PM

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From: [josh Cretella](#)
To: [Energy - Docket Optical System](#)
Subject: 23-IEPR-01 2023 Scoping Order: Please Include a Robust Land Use Analysis
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I call on the Energy Commission to align the 2023 IEPR Scoping Order with the state's own goals and with the direction already given in the 2022 Scoping Plan Update. In particular:

- The Scoping Order should include SB 375 in its list of relevant legislation.
- The IEPR Scoping Order should include a focus on building more infill housing in climate-resilient, high-opportunity areas near destinations as an essential element of equitable building energy efficiency and decarbonization, alongside electrification. Support for infill housing could include building code revisions, support for housing element development, zoning reform, and development of pre-approved, standardized building designs.
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Finally, the Scoping Order should include a focus on building decarbonization forecast scenarios that consider our overall housing need, consistent with the California Department of Finance population projections and linked to Department of Housing and Community Development estimates and local Housing Elements. How the projected increase in housing is accommodated has important carbon and energy implications, so a robust analysis is essential to include in the scope of the IEPR.

Three scenarios to consider are:

1. Compact, mixed use development is built in existing urban and inner suburban areas. These areas tend to be coastal and thus more temperate - particularly as our climate changes - with relatively low energy needs. This is the lowest-energy and most environmentally just pathway, and I call on the Energy Commission to prioritize it.

2. Single family housing is built in exurban sprawl areas in California.

On a consumption basis, including VMT, this housing is roughly 1.5x as carbon intensive as equivalent-income infill housing, according to a UC Berkeley study and RMI analysis. It also results in long, debilitating commutes, increased fire risk, and increased exposure to extreme heat, particularly for lower income people and people of color.

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As a matter of wise energy policy - and of following state laws such as SB 375 - the Energy Commission must support the transition to more sustainable, human-centered, and just communities, and not simply pursue an all-electric version of the status quo. It's past time to get serious about the benefits of walkable, bikeable communities with dense and abundant housing.

josh Cretella

From: [Maroun Najjar](#)
To: [Energy - Docket Optical System](#)
Subject: 23-IEPR-01 2023 Scoping Order: Please Include a Robust Land Use Analysis
Date: Wednesday, March 15, 2023 5:45:40 PM

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The Scoping Plan Update adds: "More compact infill development generally generates lower emissions because attached building types and smaller residential unit sizes require fewer emissions to construct and less energy to heat and cool. Studies have estimated that infill development uses 10 to 20 percent less residential energy due to changes in unit types, sizes, and locations. Additional benefits include reduced heat island effects from paved surfaces like parking lots, which lowers long-term building energy use, and reduced emissions from the construction of infrastructure."

Building sustainable communities is also a matter of equity. The Scoping Plan Update is unequivocal: "Shifting California's development patterns and transportation systems is critical to address existing injustices by making livable, affordable homes with multi-modal connections to jobs, services, open space, and education available to all Californians, not just the white and the wealthy."

We simply cannot meet our state goals of equity, climate justice, and housing justice without building more infill housing, taking on sprawl, and driving dramatically less. Yes, renewable energy is essential, and so are heat pumps and electric cars - but they are not enough.

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Maroun Najjar

From: [Nina Block](#)
To: [Energy - Docket Optical System](#)
Subject: 23-IEPR-01 2023 Scoping Order: Please Include a Robust Land Use Analysis
Date: Wednesday, March 15, 2023 5:51:20 PM

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Nina Block

From: [Christian Damerow](#)
To: [Energy - Docket Optical System](#)
Subject: 23-IEPR-01 2023 Scoping Order: Please Include a Robust Land Use Analysis
Date: Wednesday, March 15, 2023 5:54:18 PM

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Christian Damerow

From: [Karen Parolek](#)
To: [Energy - Docket Optical System](#)
Subject: 23-IEPR-01 2023 Scoping Order: Please Include a Robust Land Use Analysis
Date: Wednesday, March 15, 2023 5:54:42 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Docket Unit Docket No. 23-IEPR-01 (Public Comment),

Dear team,

Thanks for sharing this draft of the 2023 IEPR Scoping Order and allowing us to comment. I live, work and am raising my children in Berkeley. Living in a wonderful, walkable, bikeable, tree-lined neighborhood has enabled me to raise my children in an environment where they can gain early independence by being able to walk, bike and scoot to school, while we all do our part to reduce climate change. It has enabled us to live a car-light lifestyle, with only one car for our family of four, that we mostly use only to travel out of town on occasional trips.

This type of neighborhood and lifestyle is critical to reduce our carbon footprint. We must support and create more walkable, bikeable neighborhoods to help others have the opportunity to reduce their dependence on cars and fossil fuels and to give those who can't drive or who can't afford to drive more independence and opportunity.

So why does the draft Scoping Order NEVER ONCE mention the need to sustainably solve our housing crisis, end car dependency, or build walkable, sustainable communities?

California is short about 2.5 million homes, according to our Regional Housing Needs Allocation. And in calling for a 25% reduction in driving by 2030, the 2022 Scoping Plan Update was crystal clear: "Zero-emission vehicles are not enough to solve the climate crisis."

The Scoping Plan Update adds: "More compact infill development generally generates lower emissions because attached building types and smaller residential unit sizes require fewer emissions to construct and less energy to heat and cool. Studies have estimated that infill development uses 10 to 20 percent less residential energy due to changes in unit types, sizes, and locations. Additional benefits include reduced heat island effects from paved surfaces like parking lots, which lowers long-term building energy use, and reduced emissions from the construction of infrastructure."

Building sustainable communities is also a matter of equity. The Scoping Plan Update is unequivocal: "Shifting California's development patterns and transportation systems is critical to address existing injustices by making livable, affordable homes with multi-modal connections to jobs, services, open space, and education available to all Californians, not just the white and the wealthy."

We simply cannot meet our state goals of equity, climate justice, and housing justice without building more infill housing, taking on sprawl, and driving dramatically less. Yes, renewable

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The Scoping Plan Update already calls on the state to do better on land use: "Plan and invest in a sustainable transportation system. [...] Manage the use of the transportation system to advance climate and equity goals. Consider policies to optimize the use of California's transportation infrastructure by prioritizing the movement of people over vehicles. [And improve] alignment of land use planning and development with climate and equity goals. Consider policies to accelerate infill development, affirmatively further fair housing, and increase natural and working lands protection, in furtherance of the State's planning priorities."

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Karen Parolek

From: [Margaret Emerson](#)
To: [Energy - Docket Optical System](#)
Subject: 23-IEPR-01 2023 Scoping Order: Please Include a Robust Land Use Analysis
Date: Wednesday, March 15, 2023 5:56:39 PM

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1. Compact, mixed use development is built in existing urban and inner suburban areas. These areas tend to be coastal and thus more temperate - particularly as our climate changes - with relatively low energy needs. This is the lowest-energy and most environmentally just pathway, and I call on the Energy Commission to prioritize it.

2. Single family housing is built in exurban sprawl areas in California.

On a consumption basis, including VMT, this housing is roughly 1.5x as carbon intensive as equivalent-income infill housing, according to a UC Berkeley study and RMI analysis. It also results in long, debilitating commutes, increased fire risk, and increased exposure to extreme heat, particularly for lower income people and people of color.

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This housing will generally be in even more extreme climates and in jurisdictions with less stringent code requirements and renewable energy penetration, and thus cause greater carbon/energy leakage.

As a matter of wise energy policy - and of following state laws such as SB 375 - the Energy Commission must support the transition to more sustainable, human-centered, and just communities, and not simply pursue an all-electric version of the status quo. It's past time to get serious about the benefits of walkable, bikeable communities with dense and abundant housing.

Margaret Emerson

From: [Minona Heaviland](#)
To: [Energy - Docket Optical System](#)
Subject: 23-IEPR-01 2023 Scoping Order: Please Include a Robust Land Use Analysis
Date: Wednesday, March 15, 2023 5:56:54 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Docket Unit Docket No. 23-IEPR-01 (Public Comment),

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Building sustainable communities is also a matter of equity. The Scoping Plan Update is unequivocal: "Shifting California's development patterns and transportation systems is critical to address existing injustices by making livable, affordable homes with multi-modal connections to jobs, services, open space, and education available to all Californians, not just the white and the wealthy."

We simply cannot meet our state goals of equity, climate justice, and housing justice without building more infill housing, taking on sprawl, and driving dramatically less. Yes, renewable energy is essential, and so are heat pumps and electric cars - but they are not enough.

The Scoping Plan Update already calls on the state to do better on land use: "Plan and invest in a sustainable transportation system. [...] Manage the use of the transportation system to advance climate and equity goals. Consider policies to optimize the use of California's transportation infrastructure by prioritizing the movement of people over vehicles. [And improve] alignment of land use planning and development with climate and equity goals. Consider policies to accelerate infill development, affirmatively further fair housing, and increase natural and working lands protection, in furtherance of the State's planning priorities."

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Minona Heaviland

From: [Paul Koehler](#)
To: [Energy - Docket Optical System](#)
Subject: 23-IEPR-01 2023 Scoping Order: Please Include a Robust Land Use Analysis
Date: Wednesday, March 15, 2023 5:58:23 PM

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Paul Koehler

From: [Van Rookhuyzen](#)
To: [Energy - Docket Optical System](#)
Subject: 23-IEPR-O1 2023 Scoping Order: Please Include a Robust Land Use Analysis
Date: Wednesday, March 15, 2023 6:03:42 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

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Van Rookhuyzen

From: [Peter Fenczik](#)
To: [Energy - Docket Optical System](#)
Subject: 23-IEPR-01 2023 Scoping Order: Please Include a Robust Land Use Analysis
Date: Wednesday, March 15, 2023 6:07:15 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

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Peter Fenczik

From: [Donald Robertson](#)
To: [Energy - Docket Optical System](#)
Subject: 23-IEPR-01 2023 Scoping Order: Please Include a Robust Land Use Analysis
Date: Wednesday, March 15, 2023 6:12:47 PM

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Donald Robertson

From: [Cathy Baird](#)
To: [Energy - Docket Optical System](#)
Subject: 23-IEPR-01 2023 Scoping Order: Please Include a Robust Land Use Analysis
Date: Wednesday, March 15, 2023 6:14:17 PM

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Cathy Baird

From: [Ashok Panbuchelvam](#)
To: [Energy - Docket Optical System](#)
Subject: 23-IEPR-01 2023 Scoping Order: Please Include a Robust Land Use Analysis
Date: Wednesday, March 15, 2023 6:19:13 PM

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Ashok Panbuchelvam

From: [Natasha Saravanja](#)
To: [Energy - Docket Optical System](#)
Subject: 23-IEPR-01 2023 Scoping Order: Please Include a Robust Land Use Analysis
Date: Wednesday, March 15, 2023 6:22:41 PM

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Natasha Saravanja

From: [Daniel Eisenberg](#)
To: [Energy - Docket Optical System](#)
Subject: 23-IEPR-01 2023 Scoping Order: Please Include a Robust Land Use Analysis
Date: Wednesday, March 15, 2023 6:22:43 PM

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Daniel Eisenberg

From: [Edward Sullivan](#)
To: [Energy - Docket Optical System](#)
Subject: 23-IEPR-01 2023 Scoping Order: Please Include a Robust Land Use Analysis
Date: Wednesday, March 15, 2023 6:27:34 PM

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Edward Sullivan

From: [Hannah Pitt](#)
To: [Energy - Docket Optical System](#)
Subject: 23-IEPR-01 2023 Scoping Order: Please Include a Robust Land Use Analysis
Date: Wednesday, March 15, 2023 6:28:39 PM

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As a matter of wise energy policy - and of following state laws such as SB 375 - the Energy Commission must support the transition to more sustainable, human-centered, and just communities, and not simply pursue an all-electric version of the status quo. It's past time to get serious about the benefits of walkable, bikeable communities with dense and abundant housing.

Hannah Pitt

From: [Ben Brucker](#)
To: [Energy - Docket Optical System](#)
Subject: 23-IEPR-01 2023 Scoping Order: Please Include a Robust Land Use Analysis
Date: Wednesday, March 15, 2023 6:40:40 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Docket Unit Docket No. 23-IEPR-01 (Public Comment),

Thank you for the opportunity to comment on the 2023 IEPR Scoping Order. I am writing to express my deep concern that the draft Scoping Order NEVER ONCE mentions the need to sustainably solve our housing crisis, end car dependency, or build walkable, sustainable communities.

California is short about 2.5 million homes, according to our Regional Housing Needs Allocation. And in calling for a 25% reduction in driving by 2030, the 2022 Scoping Plan Update was crystal clear: "Zero-emission vehicles are not enough to solve the climate crisis."

The Scoping Plan Update adds: "More compact infill development generally generates lower emissions because attached building types and smaller residential unit sizes require fewer emissions to construct and less energy to heat and cool. Studies have estimated that infill development uses 10 to 20 percent less residential energy due to changes in unit types, sizes, and locations. Additional benefits include reduced heat island effects from paved surfaces like parking lots, which lowers long-term building energy use, and reduced emissions from the construction of infrastructure."

Building sustainable communities is also a matter of equity. The Scoping Plan Update is unequivocal: "Shifting California's development patterns and transportation systems is critical to address existing injustices by making livable, affordable homes with multi-modal connections to jobs, services, open space, and education available to all Californians, not just the white and the wealthy."

We simply cannot meet our state goals of equity, climate justice, and housing justice without building more infill housing, taking on sprawl, and driving dramatically less. Yes, renewable energy is essential, and so are heat pumps and electric cars - but they are not enough.

The Scoping Plan Update already calls on the state to do better on land use: "Plan and invest in a sustainable transportation system. [...] Manage the use of the transportation system to advance climate and equity goals. Consider policies to optimize the use of California's transportation infrastructure by prioritizing the movement of people over vehicles. [And improve] alignment of land use planning and development with climate and equity goals. Consider policies to accelerate infill development, affirmatively further fair housing, and increase natural and working lands protection, in furtherance of the State's planning priorities."

Even beyond questions of alignment with state goals, unless it considers housing policy, the

IEPR will not accurately or adequately model the range of energy outcomes in California. The state's housing stock has not kept up with historical population growth, and continued failure to build enough housing will surely lead to more displacement out of state – disproportionately people of color and lower income residents who cannot keep up with housing costs. Meanwhile, continuing to underproduce housing will mean (on average) an older, less efficient, and less electrified housing stock than would be predicted by assuming housing follows directly from population forecasts. The Energy Commission simply cannot accurately account for the state's demography and building stock – and thus energy and environmental outcomes – if it continues to treat housing policy and population as exogenous variables.

I call on the Energy Commission to align the 2023 IEPR Scoping Order with the state's own goals and with the direction already given in the 2022 Scoping Plan Update. In particular:

- The Scoping Order should include SB 375 in its list of relevant legislation.
- The IEPR Scoping Order should include a focus on building more infill housing in climate-resilient, high-opportunity areas near destinations as an essential element of equitable building energy efficiency and decarbonization, alongside electrification. Support for infill housing could include building code revisions, support for housing element development, zoning reform, and development of pre-approved, standardized building designs.
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- The IEPR Scoping Order should acknowledge the interconnected nature of our energy policies. For example, dense housing can support reduced VMT, reduced demand for energy, and reduced need for building materials.

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Ben Brucker

From: [Chris Rose](#)
To: [Energy - Docket Optical System](#)
Subject: 23-IEPR-01 2023 Scoping Order: Please Include a Robust Land Use Analysis
Date: Wednesday, March 15, 2023 6:42:49 PM

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From: [Ruthe Benton](#)
To: [Energy - Docket Optical System](#)
Subject: 23-IEPR-01 2023 Scoping Order: Please Include a Robust Land Use Analysis
Date: Wednesday, March 15, 2023 6:45:51 PM

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