

**DOCKETED**

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<b>Document Title:</b>	25 Various Members - 2023 Scoping Order Please Include a Robust Land Use Analysis
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*Comment Received From: 25 Various Members Comments 6*  
*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:** [Marissa Strebler](#)  
**To:** [Energy - Docket Optical System](#)  
**Subject:** 23-IEPR-01 2023 Scoping Order: Please Include a Robust Land Use Analysis  
**Date:** Wednesday, March 15, 2023 9:34:02 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.
- The IEPR scope should include forecasting and policy recommendations that will achieve California's vehicle miles traveled (VMT) reduction targets consistent with the 2022 Scoping Plan Update. To that end, the IEPR scope should consider mode shift, mixed-use development, and building more infill housing in climate-resilient, high-opportunity areas near destinations like jobs, schools, and amenities. VMT reduction can also be considered as a transportation energy efficiency measure.
- The IEPR Scoping Order should include micromobility and walking as legitimate transportation modes on par with driving and public transit, and as impactful climate and transportation justice measures that are an essential part of any transportation analysis.
- 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.

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.

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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.

Marissa Strebler

**From:** [Andrew Hawkins](#)  
**To:** [Energy - Docket Optical System](#)  
**Subject:** 23-IEPR-01 2023 Scoping Order: Please Include a Robust Land Use Analysis  
**Date:** Wednesday, March 15, 2023 9:42:16 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. As a resident of Santa Barbara with a young family, not only am I concerned with what kind of world my daughter will grow up into, our region is suffering from an acute housing crisis with working people being rapidly priced out. 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.

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Andrew Hawkins



**From:** [Ann Kilby](#)  
**To:** [Energy - Docket Optical System](#)  
**Subject:** 23-IEPR-01 2023 Scoping Order: Please Include a Robust Land Use Analysis  
**Date:** Wednesday, March 15, 2023 9:43:07 PM

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Ann Kilby

**From:** [Sarah Kernasovskiy](#)  
**To:** [Energy - Docket Optical System](#)  
**Subject:** 23-IEPR-01 2023 Scoping Order: Please Include a Robust Land Use Analysis  
**Date:** Wednesday, March 15, 2023 9:53:23 PM

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Sarah Kernasovskiy

**From:** [Jonathan Karpf](#)  
**To:** [Energy - Docket Optical System](#)  
**Subject:** 23-IEPR-01 2023 Scoping Order: Please Include a Robust Land Use Analysis  
**Date:** Wednesday, March 15, 2023 10:03:17 PM

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Jonathan Karpf

**From:** [John Douglas](#)  
**To:** [Energy - Docket Optical System](#)  
**Subject:** 23-IEPR-01 2023 Scoping Order: Please Include a Robust Land Use Analysis  
**Date:** Wednesday, March 15, 2023 10:04:41 PM

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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."

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.

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.

3. Single family housing is built in sprawl areas out of state (e.g., Phoenix or Austin).

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.

John Douglas

**From:** [Henry Hooker](#)  
**To:** [Energy - Docket Optical System](#)  
**Subject:** 23-IEPR-01 2023 Scoping Order: Please Include a Robust Land Use Analysis  
**Date:** Wednesday, March 15, 2023 10:05:25 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."

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Henry Hooker

**From:** [Matt Glazer](#)  
**To:** [Energy - Docket Optical System](#)  
**Subject:** 23-IEPR-01 2023 Scoping Order: Please Include a Robust Land Use Analysis  
**Date:** Wednesday, March 15, 2023 10:13:11 PM

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I live in the Bay Area and the lack of housing/need for Uber long commutes makes my family seriously consider leaving the state, despite my partner and I having an in demand masters degree and PhD, respectively. We'd love to raise our family in this state but find the current housing situation so difficult that we're not sure we could provide the our children the quality of life we enjoyed as kids.

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."

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Three scenarios to consider are:

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

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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.

Matt Glazer

**From:** [Zack Subin](#)  
**To:** [Energy - Docket Optical System](#)  
**Subject:** 23-IEPR-01 2023 Scoping Order: Please Include a Robust Land Use Analysis  
**Date:** Wednesday, March 15, 2023 10:17:09 PM

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

I am writing as someone who works in climate policy in San Francisco. Living in a city and having an ebike instead of a second car for a two adult household, I am able to save a lot of energy, and we should account for the benefits if more people had access to housing in this context. The CEC has access to great data and modeling capabilities to create the evidence base we need for all levels of government to follow through with better housing and transportation policy. Please use it.

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."

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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.

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Zack Subin

**From:** [Allan Campbell](#)  
**To:** [Energy - Docket Optical System](#)  
**Subject:** 23-IEPR-01 2023 Scoping Order: Please Include a Robust Land Use Analysis  
**Date:** Wednesday, March 15, 2023 10:29:39 PM

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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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Allan Campbell



**From:** [Steven Keller](#)  
**To:** [Energy - Docket Optical System](#)  
**Subject:** 23-IEPR-01 2023 Scoping Order: Please Include a Robust Land Use Analysis  
**Date:** Wednesday, March 15, 2023 10:32:13 PM

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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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Steven Keller

**From:** [Ted Fishman](#)  
**To:** [Energy - Docket Optical System](#)  
**Subject:** 23-IEPR-01 2023 Scoping Order: Please Include a Robust Land Use Analysis  
**Date:** Wednesday, March 15, 2023 10:35:18 PM

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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."

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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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Ted Fishman

**From:** [Brian Kuhn](#)  
**To:** [Energy - Docket Optical System](#)  
**Subject:** 23-IEPR-01 2023 Scoping Order: Please Include a Robust Land Use Analysis  
**Date:** Wednesday, March 15, 2023 10:37:14 PM

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Brian Kuhn

**From:** [Amin Issa](#)  
**To:** [Energy - Docket Optical System](#)  
**Subject:** 23-IEPR-01 2023 Scoping Order: Please Include a Robust Land Use Analysis  
**Date:** Wednesday, March 15, 2023 10:40:21 PM

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

Hi! My name is Amin Issa, and I'm writing in from San Francisco, a city in dire need of—and brimming with opportunity for—a grander scale of density, for the sake of community, for the sake of health, and for the sake of our responsibility as a role model for others.

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."

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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.

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Amin Issa

**From:** [Julian Billings](#)  
**To:** [Energy - Docket Optical System](#)  
**Subject:** 23-IEPR-01 2023 Scoping Order: Please Include a Robust Land Use Analysis  
**Date:** Wednesday, March 15, 2023 10:55:25 PM

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Julian Billings

**From:** [Steve Fillipow](#)  
**To:** [Energy - Docket Optical System](#)  
**Subject:** 23-IEPR-01 2023 Scoping Order: Please Include a Robust Land Use Analysis  
**Date:** Wednesday, March 15, 2023 11:15:55 PM

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Steve Phillipow

**From:** [Pat Schwinn](#)  
**To:** [Energy - Docket Optical System](#)  
**Subject:** 23-IEPR-01 2023 Scoping Order: Please Include a Robust Land Use Analysis  
**Date:** Wednesday, March 15, 2023 11:16:55 PM

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**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 does not mention the need to sustainably solve our housing shortage, excess 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.
- The IEPR scope should include forecasting and policy recommendations that will achieve California's vehicle miles traveled (VMT) reduction targets consistent with the 2022 Scoping Plan Update. To that end, the IEPR scope should consider mode shift, mixed-use development, and building more infill housing in climate-resilient, high-opportunity areas near destinations like jobs, schools, and amenities. VMT reduction can also be considered as a transportation energy efficiency measure.
- The IEPR Scoping Order should include micromobility and walking as legitimate transportation modes on par with driving and public transit, and as impactful climate and transportation justice measures that are an essential part of any transportation analysis.
- 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.

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. 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 (scenario 1), 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.

3. Single family housing is built in sprawl areas out of state (e.g., Phoenix or Austin). 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.

Pat Schwinn

**From:** [Kevin Ma](#)  
**To:** [Energy - Docket Optical System](#)  
**Subject:** 23-IEPR-01 2023 Scoping Order: Please Include a Robust Land Use Analysis  
**Date:** Wednesday, March 15, 2023 11:19:03 PM

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

I write to express concern that the draft Scoping Order does not mention the need to address residential land use and its energy use, given their relatively long-term impacts.

During the most recent update to CARB's Scoping Plan, it noted that more dense infill development can reduce energy consumption per-capita due to smaller unit sizes and less pavement coverage. Additionally, such density could also reduce the need for vehicular travel, which may reduce the amount of energy needed from the grid as the fleet electrifies.

As such, I ask to align the 2023 IEPR Scoping Order with the state's land use goals (via Housing Elements and Sustainable Community Strategies) and with the direction already given in the 2022 CARB Scoping Plan Update. In particular, the Scoping Order should include:

- SB 375 in its list of relevant legislation.
- 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.
- Forecasting and recommending policy to achieve vehicle miles traveled (VMT) reduction targets consistent with the CARB Scoping Plan. To that end, the IEPR scope should consider mode shift, mixed-use development, and building more infill housing in climate-resilient, high-opportunity areas near destinations like jobs, schools, and amenities. VMT reduction can also be considered as a transportation energy efficiency measure.
- Micromobility and walking as legitimate transportation modes on par with driving and public transit, and as impactful climate and transportation justice measures that are an essential part of any transportation analysis.
- Acknowledgment 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.

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 thus should be priority.

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.

3. Single family housing is built in sprawl areas out of state (e.g., Phoenix or Austin). 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.

Kevin Ma

**From:** [Valerie Morishige](#)  
**To:** [Energy - Docket Optical System](#)  
**Subject:** 23-IEPR-01 2023 Scoping Order: Please Include a Robust Land Use Analysis  
**Date:** Wednesday, March 15, 2023 11:21:57 PM

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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."

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- The IEPR Scoping Order should include micromobility and walking as legitimate transportation modes on par with driving and public transit, and as impactful climate and transportation justice measures that are an essential part of any transportation analysis.
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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.

Valerie Morishige

**From:** [Elliot Cobb](#)  
**To:** [Energy - Docket Optical System](#)  
**Subject:** 23-IEPR-01 2023 Scoping Order: Please Include a Robust Land Use Analysis  
**Date:** Wednesday, March 15, 2023 11:27:10 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."

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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.

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- The IEPR Scoping Order should include micromobility and walking as legitimate transportation modes on par with driving and public transit, and as impactful climate and transportation justice measures that are an essential part of any transportation analysis.
- 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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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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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.

Elliot Cobb

**From:** [Jeremy Poindexter](#)  
**To:** [Energy - Docket Optical System](#)  
**Subject:** 23-IEPR-01 2023 Scoping Order: Please Include a Robust Land Use Analysis  
**Date:** Wednesday, March 15, 2023 11:41:53 PM

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

I live in San Mateo, California, and as an aspiring homeowner who hopes to live near public transit, California's energy policy is extremely important to me. California must be a leader in both sustainability and affordable housing.

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."

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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.

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Jeremy Poindexter



**From:** [Zennon Ulyate-Crow](#)  
**To:** [Energy - Docket Optical System](#)  
**Subject:** 23-IEPR-01 2023 Scoping Order: Please Include a Robust Land Use Analysis  
**Date:** Wednesday, March 15, 2023 11:50:38 PM

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Three scenarios to consider are:

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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.

Zennon Ulyate-Crow

**From:** [Carlos Arnold](#)  
**To:** [Energy - Docket Optical System](#)  
**Subject:** 23-IEPR-01 2023 Scoping Order: Please Include a Robust Land Use Analysis  
**Date:** Thursday, March 16, 2023 10:06:09 AM

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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.
- The IEPR scope should include forecasting and policy recommendations that will achieve California's vehicle miles traveled (VMT) reduction targets consistent with the 2022 Scoping Plan Update. To that end, the IEPR scope should consider mode shift, mixed-use development, and building more infill housing in climate-resilient, high-opportunity areas near destinations like jobs, schools, and amenities. VMT reduction can also be considered as a transportation energy efficiency measure.
- The IEPR Scoping Order should include micromobility and walking as legitimate transportation modes on par with driving and public transit, and as impactful climate and transportation justice measures that are an essential part of any transportation analysis.
- 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.

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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Carlos Arnold

**From:** [D Jan Visaya](#)  
**To:** [Energy - Docket Optical System](#)  
**Subject:** 23-IEPR-O1 2023 Scoping Order: Please Include a Robust Land Use Analysis  
**Date:** Wednesday, March 15, 2023 4:40:28 PM

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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.

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**From:** [Diana Bohn](#)  
**To:** [Energy - Docket Optical System](#)  
**Subject:** 23-IEPR-01 2023 Scoping Order: Please Include a Robust Land Use Analysis  
**Date:** Wednesday, March 15, 2023 4:37:59 PM

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