

DOCKETED

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| Document Title: | 13 Various Members Comments - 2023 Scoping Order_ Please Include a Robust Land Use Analysis |
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| Docketed Date: | 3/16/2023 |

Comment Received From: 13 Various Members
Submitted On: 3/17/2023
Docket Number: 23-IEPR-01

2023 Scoping Order_ Please Include a Robust Land Use Analysis

Additional submitted attachment is included below.

From: [Timothy Green](#)
To: [Energy - Docket Optical System](#)
Subject: 23-IEPR-01 2023 Scoping Order: Please Include a Robust Land Use Analysis
Date: Thursday, March 16, 2023 9:37:46 AM

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."

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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:

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- 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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Timothy Green

From: [CAMERON LEHMAN](#)
To: [Energy - Docket Optical System](#)
Subject: 23-IEPR-O1 2023 Scoping Order: Please Include a Robust Land Use Analysis
Date: Thursday, March 16, 2023 10:13:12 AM

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CAMERON LEHMAN

From: [Clark Cole](#)
To: [Energy - Docket Optical System](#)
Subject: 23-IEPR-01 2023 Scoping Order: Please Include a Robust Land Use Analysis
Date: Thursday, March 16, 2023 10:19:25 AM

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Clark Cole

From: [Diana Lowe](#)
To: [Energy - Docket Optical System](#)
Subject: 23-IEPR-01 2023 Scoping Order: Please Include a Robust Land Use Analysis
Date: Thursday, March 16, 2023 10:44:55 AM

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Diana Lowe

From: [Chuck Flacks](#)
To: [Energy - Docket Optical System](#)
Subject: 23-IEPR-01 2023 Scoping Order: Please Include a Robust Land Use Analysis
Date: Thursday, March 16, 2023 10:58:19 AM

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Chuck Flacks

From: [Sprague Terplan](#)
To: [Energy - Docket Optical System](#)
Subject: 23-IEPR-01 2023 Scoping Order: Please Include a Robust Land Use Analysis
Date: Thursday, March 16, 2023 11:03:32 AM

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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.

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 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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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.

Sprague Terplan

From: [Saad Asad](#)
To: [Energy - Docket Optical System](#)
Subject: 23-IEPR-O1 2023 Scoping Order: Please Include a Robust Land Use Analysis
Date: Thursday, March 16, 2023 11:16:05 AM

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:

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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.

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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.

Saad Asad

From: [Ryan Meckel](#)
To: [Energy - Docket Optical System](#)
Subject: 23-IEPR-O1 2023 Scoping Order: Please Include a Robust Land Use Analysis
Date: Thursday, March 16, 2023 11:25:43 AM

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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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Ryan Meckel

From: [Amanda Wells](#)
To: [Energy - Docket Optical System](#)
Subject: 23-IEPR-01 2023 Scoping Order: Please Include a Robust Land Use Analysis
Date: Thursday, March 16, 2023 12:27:20 PM

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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. We also need energy efficiency in new and existing housing. For example, the apartment I live in, in Walnut Creek, needs better insulation, a more efficient wall heater and collar unit, and the appliances are all older than 20 years old.

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."

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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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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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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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Amanda Wells

From: [Jay Miller](#)
To: [Energy - Docket Optical System](#)
Subject: 23-IEPR-01 2023 Scoping Order: Please Include a Robust Land Use Analysis
Date: Thursday, March 16, 2023 3:19:11 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."

In building homes we have two choices: 1. place the homes near the businesses where people work or 2. place new businesses near where there is room to build housing affordably. For too long our cities have done neither of these. Instead they have placed many businesses inside their city limits so they can collect the high tax revenues provided by commercial developments but failed to provide anywhere close to adequate housing supply within 5-10 miles of all the new jobs created by these businesses. Your plan to reduce the amount of driving must responsibly manage any new business or commercial development within cities to ensure that they are sited close to a supply of housing ready to support all the new workers.

We cannot continue to allow cities like Vernon that have many businesses but only 200 residents for the entire city. This is not what cities are supposed to be. They are not profit generating entities. They are organizations designed to serve the people who work to create the tax revenue paid by the businesses. However, city policies have made it impossible for these workers to actually live within the city limits where they work should they choose to do so. As a result, these workers are not able to participate in the democratic process to elect city leaders whose salary they are paying through their work for the companies. Our country was founded on an idea of no taxation without representation, but for decades our city policies have virtually guaranteed that workers cannot vote in any elections where they work because they have been priced out of the local markets close to the jobs.

I currently live in Loma Linda but used to live in Riverside about 5 miles from where she worked as a PhD Education professor. But after she passed away from cancer, I chose to move closer to my job at Loma Linda University. It cost me about \$100,000 more for the new house but I felt it was worth the extra 1.5-2 hours I gained back in my daily routine. However, there are many people who work for organizations like Loma Linda University that cannot afford to live close to their jobs, and that is the problem when cities drive up demand for housing but hold down the supply of housing at the same time. That is the precise recipe for a housing crisis as we are

experiencing today. I myself and looking for work nearby, but have had to tell many potential employers that I cannot afford to commute or move to any of the areas close to the coast because of the increased cost of housing in the last few years and the higher mortgage rates.

Also my father lived in Lodi California in a modest mobile home that was paid for. But after my mother passed away from cancer a few years ago, his social security benefit was reduced by nearly 50% and he began to struggle with his finances. Soon afterward he met and married a woman from the Philippines and soon realized that the two of them could not afford even the space rent on his paid for home. So they were forced to pack everything up and move to the Philippines where she had a family property on which they could live. He has been there ever since living comfortably but without any chance of ever seeing his family again as travel back to the US is expensive and his wife is not able to obtain a VISA. My brother and I are financing a trip for 88 year old father to return for two weeks to take care of personal business with his bank and have medical appointments with the VA offices in California since the health care close to where he lives in the Philippines is close to 3rd world quality care.

As for my children, they both have college degrees but have no expectation of being able to afford to purchase a house in the current economy. One son works in Brooklyn, NY and lives in a modest apartment there while he works for a startup company which he hopes will someday go public and provide him with a greater measure of financial independence. However, that is a long shot and there is certainly no guarantee his plan will ever pan out. My other son lives with me in Loma Linda as he does not have enough income to afford any apartment on his own. He is hard working and frustrated that our state's economics do not give him the opportunity he wants for independence so he can support himself and move on with his life. Neither son has any plans for marriage anytime in the near future as they do not feel stable enough to enter into such a situation.

Earlier in my career I lived and worked in the Napa Valley for a small private college after moving from Tucson, Arizona. My family chose to rent as housing in and around the town of Angwin was exorbitant even though we had owned a house almost the entire 18 years we lived in Tucson. Because we had little debt, we were able to afford the rent. However, many coworkers with Pacific Union College were not so fortunate and most of them had to commute in 45 minutes of dangerous roads from Lake County where the lower cost of living made housing more affordable. Others had to live in campus housing (apartments or trailers) that were originally built to house students. The college and the associated St. Helena Hospital had trouble recruiting new staff precisely because of the housing cost. Even physicians looked at what their housing dollars could afford and chose to work elsewhere. The challenge with Napa County was the slow growth initiative designed to protect agriculture from urban sprawl. Unfortunately the county failed to implement a corresponding slow growth plan for business and agriculture which grew at a much faster pace. As a result during the years I lived and worked there (2001-2015) the traffic on the two routes in and out of the Napa Valley became impossibly clogged with not just tourist traffic, but also with workers driving to and from their jobs at wineries, vineyards, restaurants and resorts. It got so bad the many restaurants closed for lack of workers willing to brave the commute and many proposed resorts backed out for the same reason. A news story reported that the county even hired a new HR vice president but

that individual chose to commute in every day from Grass Valley rather than move to Napa. In the end the county slow growth initiative actually became a net negative growth initiative as many existing properties sold to people using them a few weeks a year, and most new construction was similar. So people who actually wanted to live and work in the area were being forced out slowly. I expect that in the next few years, there will be few people who actually live full time anywhere in Napa County as these trends seem to not be changing in any practical way.

Essentially in my family's experience, our whole social system in California has broken down and we see no future for our parents, children, co-workers or ourselves given the economic conditions imposed on us by the actions of local city leaders all over the state. The sad thing is that similar situations are taking place in many other cities outside of California as our trends tend to migrate slowly to the rest of the country. My new wife is from Portland and they have virtually identical problems there as well. Her daughter still lives there and can only afford to stay because she still owns a home there which her daughter can rent from her at a greatly reduced price. So just adding a few thousand homes to the supply in the state will hardly begin to solve our problems. We must also address all the problems related to the demand for housing that has gotten completely out of control. In the end the problem will solve itself if companies give up on the state and decide that they cannot operate here because they cannot convince people to commute or move close to their facilities because there is no reasonable housing to be had anywhere.

I am happy to provide consulting services to any non-profit or government entity seeking to solve the problem by looking at more than just the supply of housing.

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

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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.

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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.

Sincerely,

Camedon Jay Miller

From: [Laura Thomas](#)
To: [Energy - Docket Optical System](#)
Subject: 23-IEPR-01 2023 Scoping Order: Please Include a Robust Land Use Analysis
Date: Thursday, March 16, 2023 3:39:10 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 concern that the draft Scoping Order NEVER ONCE mentions the need to 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.

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.

Laura Thomas

From: [Timothy Bauman](#)
To: [Energy - Docket Optical System](#)
Subject: 23-IEPR-O1 2023 Scoping Order: Please Include a Robust Land Use Analysis
Date: Thursday, March 16, 2023 8:31:44 AM

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 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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Timothy Bauman

From: [Liza Baskir](#)
To: [Energy - Docket Optical System](#)
Subject: 23-IEPR-01 2023 Scoping Order: Please Include a Robust Land Use Analysis
Date: Thursday, March 16, 2023 12:40:01 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 live in Northern California, and I am looking for more walkable and bikeable streets in my community.

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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