

DOCKETED

Docket Number:	23-IEPR-01
Project Title:	General Scope
TN #:	249361
Document Title:	27 Various Public Members Comments - 2023 Scoping Order - Please Include a Robust Land Use Analysis
Description:	N/A
Filer:	System
Organization:	27 Various Public Members
Submitter Role:	Public
Submission Date:	3/20/2023 10:15:14 AM
Docketed Date:	3/20/2023

*Comment Received From: 27 Various Public Members
Submitted On: 3/20/2023
Docket Number: 23-IEPR-01*

2023 Scoping Order - Please Include a Robust Land Use Analysis

Additional submitted attachment is included below.

From: [Jimmie Yonemoto](#)
To: [Energy - Docket Optical System](#)
Subject: 23-IEPR-O1 2023 Scoping Order: Please Include a Robust Land Use Analysis
Date: Friday, March 17, 2023 5:42:33 PM

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

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

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

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

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

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

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

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

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

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

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

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

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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.

Jimmie Yonemoto

yonemotojimmie@gmail.com

From: [David Barboza](#)
To: [Energy - Docket Optical System](#)
Subject: 23-IEPR-01 2023 Scoping Order: Please Include a Robust Land Use Analysis
Date: Saturday, March 18, 2023 5:26:45 PM

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David Barboza
dejaybe@gmail.com

Whittier, California 90602

From: [Annette Billingsley](#)
To: [Energy - Docket Optical System](#)
Subject: 23-IEPR-01 2023 Scoping Order: Please Include a Robust Land Use Analysis
Date: Sunday, March 19, 2023 5:24:31 PM

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

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

Thank you for the opportunity to comment on the 2023 IEPR Scoping Order. I am writing to express my deep concern that the draft Scoping Order NEVER ONCE mentions the need to sustainably solve our housing crisis, end car dependency, or build walkable, sustainable communities. I am a 37 year resident of San Francisco and deeply believe our housing crisis solution is through building more 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.

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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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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Annette Billingsley
ab94115@gmail.com

San Francisco, California 94115

From: [Janeen Brumm](#)
To: [Energy - Docket Optical System](#)
Subject: 23-IEPR-01 2023 Scoping Order: Please Include a Robust Land Use Analysis
Date: Saturday, March 18, 2023 9:39:56 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.

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

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Janeen Brumm

jrbrumm@gmail.com

Pleasanton, California 94588

From: [Leo Buckley](#)
To: [Energy - Docket Optical System](#)
Subject: 23-IEPR-O1 2023 Scoping Order: Please Include a Robust Land Use Analysis
Date: Friday, March 17, 2023 6:34:53 PM

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Leo Buckley

buckleo666@gmail.com

From: [Mike Bullock](#)
To: [Energy - Docket Optical System](#)
Subject: 23-IEPR-01 2023 Scoping Order: Please Include a Robust Land Use Analysis
Date: Saturday, March 18, 2023 5:06:48 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.

Cars (LDVs, really) emit the most GHG.

We have a 2030 climate stabilization requirement AND an easier CA mandate, for 2030.

Align with CARB's Scoping Plan. We need a reduction in VMT, by 2030, because it is a myth that car electrification alone will achieve the 2030 climate mandate.

We must price parking. mike_bullock@earthlink.net for the details on car parking systems that are operated for the financial gains of the groups for which they are built: workers, train riders, etc., etc. and etc.

We need a means-based, CA Road Use Charge (RUC) to replace the very regressive state gas tax.

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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.

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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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.

Mike Bullock
mike_bullock@earthlink.net

Oceanside, California 92054

From: [Jeffrey Diamond](#)
To: [Energy - Docket Optical System](#)
Subject: 23-IEPR-01 2023 Scoping Order: Please Include a Robust Land Use Analysis
Date: Sunday, March 19, 2023 2:05:31 PM

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

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

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

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

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

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

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

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

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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.

Jeffrey Diamond

jdiamond57@gmail.com

Sebastopol, California 95472

From: [Marcia Edelen](#)
To: [Energy - Docket Optical System](#)
Subject: 23-IEPR-01 2023 Scoping Order: Please Include a Robust Land Use Analysis
Date: Friday, March 17, 2023 8:29:09 PM

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

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Marcia Edelen
mar4me@gmail.com

Berkeley, California 94704

From: [Gary Farber](#)
To: [Energy - Docket Optical System](#)
Subject: 23-IEPR-01 2023 Scoping Order: Land Use Should Prioritize Energy and GHG Emission Reductions.
Date: Sunday, March 19, 2023 4:21:56 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 Walnut Creek, and am very concerned about global heating and bad land use choices that increase energy and water consumption, make residents more auto-dependent, and increase GHG emissions.

I am very concerned about the draft Scoping Order NEVER ONCE mentioning 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.

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.

Gary Farber
garyf8642@gmail.com

Walnut Creek, California 94598

From: [Joel Guzman](#)
To: [Energy - Docket Optical System](#)
Subject: 23-IEPR-01 2023 Scoping Order: Please Include a Robust Land Use Analysis
Date: Saturday, March 18, 2023 10:29:21 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 from Sacramento 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."

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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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Joel Guzman
jdguzman@gmail.com

SACRAMENTO, California 95818

From: [Emma Ling](#)
To: [Energy - Docket Optical System](#)
Subject: 23-IEPR-01 2023 Scoping Order: Please Include a Robust Land Use Analysis
Date: Saturday, March 18, 2023 12:46:43 PM

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

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

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- 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.

Emma Ling
emmaling27@gmail.com

Oakland, California 94609

From: [Kymberly McClain](#)
To: [Energy - Docket Optical System](#)
Subject: 23-IEPR-01 2023 Scoping Order: Please Include a Robust Land Use Analysis
Date: Friday, March 17, 2023 6:40:53 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. My name is Kymberly, 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. I was forced to move to a rural community seeking affordable housing but I've sacrificed job security and walkable 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.

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.

Kymerly McClain
soaac.inc@gmail.com

Twentynine Palms, California 92277

From: [Caephren McKenna](#)
To: [Energy - Docket Optical System](#)
Subject: 23-IEPR-01 2023 Scoping Order: Please Include a Robust Land Use Analysis
Date: Saturday, March 18, 2023 5:39:34 PM

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

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

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

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

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

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

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

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

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

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

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

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

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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.

Caephren McKenna
caephren@gmail.com

Oakland, California 94609

From: [Kevin McNamara](#)
To: [Energy - Docket Optical System](#)
Subject: 23-IEPR-01 2023 Scoping Order: Please Include a Robust Land Use Analysis
Date: Sunday, March 19, 2023 12:02:42 PM

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

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

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.

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 McNamara

kmcnamara12000@yahoo.com

Rio Vista, California 94571

From: [Sean Murray](#)
To: [Energy - Docket Optical System](#)
Subject: 23-IEPR-01 2023 Scoping Order: Please Include a Robust Land Use Analysis
Date: Sunday, March 19, 2023 12:34:02 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. As a San Francisco resident who lives without a car, I believe from firsthand experience that having walkable neighborhoods and cities is vital to economic growth and thriving communities.

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

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

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

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

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

Even beyond questions of alignment with state goals, unless it considers housing policy, the IEPR will not accurately or adequately model the range of energy outcomes in California. The state's housing stock has not kept up with historical population growth, and continued failure to build enough housing will surely lead to more displacement out of state – disproportionately people of color and lower income residents who cannot keep up with housing costs.

Meanwhile, continuing to underproduce housing will mean (on average) an older, less efficient, and less electrified housing stock than would be predicted by assuming housing follows directly from population forecasts. The Energy Commission simply cannot accurately account for the state's demography and building stock – and thus energy and environmental outcomes – if it continues to treat housing policy and population as exogenous variables.

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

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

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.

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.

Thank you for taking the time to consider my input.

Sean Murray

Sean Murray

seanbuckeye@gmail.com

San Francisco, California 94109

From: [Savita Nataraj](#)
To: [Energy - Docket Optical System](#)
Subject: 23-IEPR-O1 2023 Scoping Order: Please Include a Robust Land Use Analysis
Date: Friday, March 17, 2023 10:08:22 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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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.

I live in San Jose of California and safe biking paths are not the norm. I drive to work and I drive for anything I need but I would much rather prefer and even want to pay for a home or rental place that is within a walkable and biking community. With access to local business and safe biking paths that are protected lanes rather than half hearted painted lines next to the road. I want to go biking with my kids and explore my local community con eventually and safely without needing to use a car for every little thing. I want to believe in a California that is livable rather than barely surviving.

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.

Savita Nataraj
miloticcog@gmail.com

San Jose, California 95118

From: [Aviv Nitsan](#)
To: [Energy - Docket Optical System](#)
Subject: 23-IEPR-01 2023 Scoping Order: Please Include a Robust Land Use Analysis
Date: Sunday, March 19, 2023 9:18:20 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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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.

Aviv Nitsan
aviv@berkeley.edu

Kensington, California 94708

From: [Lexi Nutkiewicz](#)
To: [Energy - Docket Optical System](#)
Subject: 23-IEPR-01 2023 Scoping Order: Please Include a Robust Land Use Analysis
Date: Sunday, March 19, 2023 7:52:31 AM

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Lexi Nutkiewicz

lexinutkiewicz@gmail.com

San Francisco, California 94133

From: [Tristi Owen](#)
To: [Energy - Docket Optical System](#)
Subject: 23-IEPR-01 2023 Scoping Order: Please Include a Robust Land Use Analysis
Date: Saturday, March 18, 2023 7:29:38 PM

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

In addition to the message bellow written collaboratively by my organization, I would like to briefly express what I see as the critical failing of current housing policy. Decisions on housing development consider first the value of the home as a financial instrument, not is value to provide its occupants housing. It is my belief that housing should be treated first as a basic human right and as one integral part of the city it is in. Not as an investment. Continuing to treat housing as an investment first (without public or otherwise non for profit alternatives) will continue to promote, not the best housing for people or society, but the housing optimized to extract as much wealth as possible from society for the benefit of a few.

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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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Tristi Owen
tristiowen@gmail.com

San Fransisco, California 94103

From: [Michael Sacks](#)
To: [Energy - Docket Optical System](#)
Subject: 23-IEPR-01 2023 Scoping Order: Please Include a Robust Land Use Analysis
Date: Friday, March 17, 2023 6:12:40 PM

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Michael Sacks

michaelsacks@gmail.com

From: [Sean McKenna](#)
To: [Energy - Docket Optical System](#)
Subject: 23-IEPR-01 2023 Scoping Order: Please Include a Robust Land Use Analysis
Date: Saturday, March 18, 2023 7:06:11 PM

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Sean McKenna

sean-mckenna@outlook.com

San Francisco, California 94158

From: [Anav Sharma](#)
To: [Energy - Docket Optical System](#)
Subject: 23-IEPR-01 2023 Scoping Order: Please Include a Robust Land Use Analysis
Date: Sunday, March 19, 2023 12:51:52 PM

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Anav Sharma

anavsharma@gmail.com

Culver City, California 90232

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

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Susan Tatro

silvermaven1949@gmail.com

Eureka, California 95503

From: [Renée Threatte](#)
To: [Energy - Docket Optical System](#)
Subject: 23-IEPR-01 2023 Scoping Order: Please Include a Robust Land Use Analysis
Date: Sunday, March 19, 2023 8:41:54 AM

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Renée Threatte
renee3T@gmail.com

Los Angeles, California 90027

From: [Volker E.](#)
To: [Energy - Docket Optical System](#)
Subject: 23-IEPR-01 2023 Scoping Order: Please Include a Robust Land Use Analysis
Date: Sunday, March 19, 2023 3:52:27 AM

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Best regards,
Volker Eckl

Volker E.
volker@wikimedia.org

San Francisco, California 94110

From: [Matthew Waughtel](#)
To: [Energy - Docket Optical System](#)
Subject: 23-IEPR-01 2023 Scoping Order: Please Include a Robust Land Use Analysis
Date: Sunday, March 19, 2023 3:17:33 PM

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