

DOCKETED	
Docket Number:	23-IEPR-01
Project Title:	General Scope
TN #:	249352
Document Title:	Urban Environmentalists, SPUR, NPH, Greenbelt Alliance, and Council of Infill Builders Comments on 2023 IEPR Scoping Memo
Description:	N/A
Filer:	System
Organization:	Urban Environmentalists, SPUR, NPH, Greenbelt Alliance, and Council of Infill Builders/Joanna Gubman
Submitter Role:	Public
Submission Date:	3/17/2023 4:51:49 PM
Docketed Date:	3/17/2023

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Submitted On: 3/17/2023
Docket Number: 23-IEPR-01*

**Urban Environmentalists, SPUR, NPH, Greenbelt Alliance, and
Council of Infill Builders Comments on 2023 IEPR Scoping Memo**

Additional submitted attachment is included below.



Commissioner, Patty Monahan

Vice Chair, Siva Gunda

California Energy Commission

Integrated Energy Policy Report, IEPR, Scoping Order for 2021

Docket Number 23-IEPR-01

715 P Street

Sacramento, CA 95814

March 17, 2023

Docket Number 23-IEPR-01: 2023 Scoping Order Comments

Thank you for the opportunity to comment on the [2023 Integrated Energy Policy Report \(IEPR\) Scoping Order](#). On behalf of Urban Environmentalists, Greenbelt Alliance, SPUR, Non-Profit Housing Association of Northern California (NPH), and Council of Infill Builders, we are writing to express our deep concern that the draft Scoping Order fails to address the energy-related aspects of the need to sustainably solve our housing crisis, end car dependency, and build walkable, sustainable communities.

About Our Organizations

Urban Environmentalists empowers our network of over 7,000 grassroots activists and coalition partners to transform cities and towns into more sustainable, human-centered, and just communities through land use policy reform. We are an initiative of YIMBY Action, a network of over 45,000 pro-housing activists nationwide fighting for more inclusive housing policies.

Greenbelt Alliance is an environmental non-profit that educates, advocates, and collaborates to ensure the Bay Area's lands and communities are resilient to a changing climate. They envision a Bay Area of healthy, thriving, resilient communities made up of lands and people that are safe during climate disasters and recover quickly from wildfire, floods, and drought, where everyone is living with nature in new and powerful ways for generations to come.

SPUR is a nonprofit public policy organization in the San Francisco Bay Area. We bring people together from across the political spectrum to develop solutions to the big problems cities face. Through research, education and advocacy, SPUR works to create an equitable, sustainable and prosperous region and state.

Founded in 1979, NPH is the leading voice of the affordable housing movement of the Bay Area. As a membership organization of more than 750 affordable housing builders, advocates, and community leaders, the collective NPH community has created tens of thousands of affordable homes and supported hundreds of thousands of Bay Area residents and community members.

The Council of Infill Builders is a statewide organization of real estate professionals committed to improving California through infill development.



The 2023 IEPR Must Include Robust Land Use Analyses and Recommendations

California is short about [2.5 million homes](#) and must meet this need by 2030, according to our Regional Housing Needs Allocation. And in calling for a 25% reduction in driving by 2030, the 2022 Scoping Plan Update was clear: "Zero-emission vehicles are not enough to solve the climate crisis."¹ These are unprecedented shifts that must occur extremely quickly, and they have significant implications for our energy system. As such, they should be key focus areas of the 2023 IEPR.

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."² These significant energy impacts should be included in the IEPR analysis and incorporated into IEPR recommendations.

Building sustainable communities is also an essential equity measure. 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."³

¹ 2022 Scoping Plan Appendix E, page 4.

<https://ww2.arb.ca.gov/sites/default/files/2022-11/2022-sp-appendix-e-sustainable-and-equitable-communities.pdf#page=4>

² Ibid., 5-6.

³ Ibid., 6.

We simply cannot meet our state goals of equity, climate justice, transportation 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 - and they are not enough. We call on the Energy Commission to reflect this fact in the Scoping Order.

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."⁴ The 2023 IEPR should consider how the Energy Commission can plan for and support these efforts.

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

⁴ Ibid., 10.

energy and environmental outcomes – if it continues to treat housing policy and population as exogenous variables.

We 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. They also tend to be higher opportunity, location-efficient regions with easier access to jobs and amenities. This is the lowest-energy and most environmentally just pathway, and we 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. Walkable, bikeable, transit-rich communities with dense and abundant housing are not a just nice-to-have aspiration – they are essential.

Sincerely,

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