

DOCKETED	
Docket Number:	26-LUEP-01
Project Title:	Land Use and Environmental Information for Energy Planning
TN #:	271406
Document Title:	Golden State Clean Energy Comments - GSCE Comment on June 2026 Land Use Screens Workshop
Description:	N/A
Filer:	System
Organization:	Golden State Clean Energy
Submitter Role:	Public
Submission Date:	7/13/2026 4:21:42 PM
Docketed Date:	7/13/2026

Comment Received From: Golden State Clean Energy
Submitted On: 7/13/2026
Docket Number: 26-LUEP-01

GSCE Comment on June 2026 Land Use Screens Workshop

Additional submitted attachment is included below.



GOLDEN STATE
CLEAN ENERGY

July 13, 2026

California Energy Commission
Docket No. 26-LUEP-01
715 P Street
Sacramento, CA 95814

RE: Comment on Workshop Discussing Land Use Screens for Electric System Planning

Golden State Clean Energy, LLC (“GSCE”) submits the following comment in response to the California Energy Commission (“Commission”) staff workshop held on June 11, 2026, to discuss updates to the land use screens for electric system planning.¹

GSCE generally supports the Commission’s land use screens and their role in energy planning. Long lead-time transmission development is critical to the state’s ability to meet its SB 100 goals and requires thoughtful consideration about where future generation and storage resources can and should be developed. The land use screens have helped identify the San Joaquin Valley as an important area for future solar generation development, where agriculture is the best, most productive use for the land, but water supply limitations create development opportunities in areas that are currently or expected to be fallowed. Steering solar development to fallowed agricultural lands in the San Joaquin Valley, where the natural environment has been disturbed for many decades, helps avoid the impacts of solar development in more sensitive desert environments throughout the Desert Southwest.

It is reasonable for the Commission’s land use screens to recognize that a large amount of farmland is or will be fallowed or repurposed due to the expected decrease in available water for irrigation. However, where future water supply will be allocated and what farmland will be repurposed (and potentially available for solar development) will be largely influenced by landowner decisions, local planning, and water management regulations, including rules promulgated by groundwater sustainability agencies tasked with managing groundwater basins under California's Sustainable Groundwater Management Act (“SGMA”). Groundwater sustainability agencies are still making decisions about SGMA compliance, highlighting that future cropland conversion information is largely unknown on a granular level. Therefore, it will be difficult and potentially misleading to identify statewide or regional water supply data to construct granular screens for this issue within the Cropland Index Model.

Fortunately, as landowners (public and private) and local planners and regulators make decisions

¹ The staff workshop was noticed in, and this comment has been submitted to, Docket No. 26-LUEP-01.

about future water use and cropland conversions, the Commission will have useful *localized* data for its land use screens. This type of information provides a high level of confidence for planning purposes compared to generalized statewide planning assumptions, given the importance of local buy-in and decision-making that is often omitted from statewide planning efforts. To the extent available, when local planners and landowners find ways to support development while addressing uniquely local challenges (e.g., SGMA compliance), the state should seek to incorporate this into statewide planning to reduce state-local political challenges, such as balancing the historic importance of agriculture in the San Joaquin Valley with diminishing water supply. The state should not ignore local efforts or else statewide planning risks creating future conflicts with the local communities where these projects are being sited.

For these reasons, the Valley Clean Infrastructure Plan (“VCIP”) warrants explicit recognition in the Commission’s land use screens to show land that is ideal for future solar development. For the Westlands Water District service area, VCIP answers the question of where landowners and local regulators expect to repurpose farmland for solar development due to water supply limits. Westlands is the largest agricultural water district in the country, made up of more than 1,000 square miles of farmland in western Fresno and Kings Counties,² and it has an approved groundwater sustainability plan.³ In 2025 alone, over 215,000 acres within the Westlands Water District were fallowed (roughly 38% of the District’s irrigable farmland), and Westlands expects additional acreage to be fallowed in the future due to SGMA compliance.⁴ Further, VCIP has a final Program Environmental Impact Report covering 136,000 acres for future clean energy and transmission infrastructure development. It is reasonable for VCIP to be explicitly recognized in the land use screens due to its size and scale, the maturity of the planning underlying VCIP, the concrete actions taken to advance VCIP, and because VCIP supports SGMA implementation. Westlands and the landowners participating in VCIP are demonstrating support for future solar, battery storage, and transmission infrastructure. The Commission should be planning for future development within the VCIP footprint.

GSCE appreciates the Commission’s attention to the role of land use planning in the energy sector. We look forward to seeing the updated land use screens drive well-informed locational decisions for transmission and generation resource planning.

Respectfully submitted,

/s/ Ian Kearney
Ian Kearney
Director of Regulatory Affairs
Golden State Clean Energy, LLC
Capitol Mall, Suite 160
Sacramento, CA 95814
(559) 246-8973
ian@goldenstatecleanenergy.com

² <https://wwd.ca.gov/about-westlands/maps/>

³ <https://water.ca.gov/Programs/Groundwater-Management/SGMA-Groundwater-Management/Groundwater-Sustainability-Plans>

⁴ <https://wwd.ca.gov/wwd-media/press-release-12-16-2025/>