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Comments on Land Use Update

Additional submitted attachment is included below.

California Wind Energy Association

July 13, 2026

California Energy Commission
Docket No. 26-LUEP-01
Sacramento CA 95814

Submitted Electronically via CEC website to Docket 26-LUEP-01

Re: Comments June 11, 2026, Workshop on Land Use and Environmental Information for Energy Planning

CalWEA appreciates this opportunity to comment on the June 11, 2026, Workshop on Land Use and Environmental Information for Energy Planning.

The CEC's land-use screens are central to the CPUC's Integrated Resource Planning (IRP) process, which guides CAISO's Transmission Planning Process (TPP) and informs the Joint Agency SB 100 Analysis. Although workshop slide 7 states that the screens "are landscape-level planning information intended to inform high-level estimates of renewable build, not specific project locations," the screens have effectively conducted land-use planning by identifying resource areas for which transmission lines may be built (with deliverability capacity potentially reserved), while leaving other resource areas stranded.

Because achievement of the state's greenhouse-gas reduction goals rests on these screens, they must avoid prejudging siting feasibility and ensure that sufficient resources remain available to achieve those goals. Resource sufficiency requires a healthy margin, given numerous complex factors that must be satisfied in project development. This is especially important for California wind energy, where commercial-grade resources are already highly constrained.

To ensure that updated screens will identify commercial-grade wind resources more appropriately than the existing screens have done, and to ensure that in-state resources are treated consistently with out-of-state resources, CalWEA recommends that the Commission:

- Evaluate the results of the existing land-use screens to determine if discretionary resource exclusions are overbroad;
- Account for wind projects' potential compatibility with land-use concerns, given their limited ground footprint and flexibility in turbine-siting;
- Engage CalWEA, and other clean energy trade groups and interested parties, in the development of potential new "suitability models" while also considering simpler non-

binary approaches to screening. In either case, the land-use screens should not entirely screen out resource areas where development is not prohibited by state or federal law;

- Apply equivalent screens to all out-of-state (OOS) areas being considered in IRP planning, not just OOS areas within CAISO's control; and
- In the future, provide notice of the Energy Commission's IRP-related land-use screening activities to the CPUC's IRP service list.

We discuss these issues below.

Evaluate the results of the existing land-use screens.

The current approach of screening out large swaths of promising wind energy areas where development is not prohibited by state or federal law is simply too coarse and does not account for the ability to avoid or mitigate potential impacts. The substantial decrease in commercially viable wind resources that results from applying the CEC's binary discretionary environmental screens is shown in Maps 1 and 2 in the Appendix.

Further, CalWEA's analysis shows that the CEC's current application of discretionary screens would have excluded 42 percent of existing operating projects. See Appendix Maps 3-9, below. This demonstrates that the screens are overbroad, as each excluded project was permitted after completing the CEQA process, which requires detailed, multimillion-dollar environmental analyses (rather than the coarse desktop analysis currently being employed) to demonstrate project compatibility with onsite land-use concerns.

Staff should review and justify the current screening results for each land-use screen and the cumulative screening outcome, and address the potential compatibility of wind projects with each land-use concern, as discussed below. This review should inform the update process.

Account for wind projects' potential compatibility with land-use concerns

Commercially viable wind resource areas should not be entirely screened out due to *potential* land-use conflicts or terrestrial environmental impacts. As shown in Maps 1 and 2, the CEC's Core Land Use Screen is eliminating most of the remaining limited areas of promising wind resources in the state where development is not prohibited, based on discretionary desktop analyses. Because the screens are relatively coarse and reflect conditions over large areas, they may pick up sensitivities that will not be at play at proposed wind project sites.

Given the extensive CEQA and NEPA pre-construction surveys that proposed projects are required to conduct, the very limited terrestrial footprint of wind projects, the ability to carefully micro-site turbines around environmental sensitivities, and the ability to mitigate remaining impacts, it is vital that the agencies revisit the biological planning priorities and landscape intactness screens for application to wind energy resources. Desktop analyses are simply no substitute for detailed, on-the-ground surveys at potential project sites, which the CEC currently precludes by screening out large wind resource areas, thereby removing them from state resource and transmission planning processes.

Rather than assuming unavoidable conflicts with terrestrial conditions, the application of each biological planning priority and terrestrial intactness screen must consider the small land-disturbance footprint of wind projects, which typically permanently disturb less than 3% of the total project land area. In California, wind turbines must be carefully micro-sited to avoid sensitive areas within the lease area. Remaining intact areas within wind project boundaries can support viable populations of many sensitive taxa, as well as wildlife movement, and can protect the project area from other types of disturbance that affect sensitive species.[1] Any wholesale land-use exclusions should be justified with clear evidence.

Staff may want to use the Audubon Important Bird Areas (IBA) map to evaluate wind resource areas. Our understanding is that this layer is not used because most of the IBA areas are represented by Base Exclusions and the ACE Biodiversity, Connectivity, and Irreplaceability Layers.[2] However, the scoring methodology should not score below Level 3 for resources in these areas, given the highly site- and species-specific nature of potential bird impacts and many new and emerging detection and avoidance technologies.[3]

Engage stakeholders in developing new screening approaches.

CalWEA strongly supports a less "binary" approach to the land-use screens than is currently employed. However, this may not require the full complexity of the "suitability model" that staff are contemplating. Instead, the current approach could be refined. Instead of using terrestrial environmental screens to exclude commercially viable wind resources, staff could apply reasonable discount factors to each screen to account for sensitive areas that must be avoided or mitigated, as noted above. The rationale for each discount factor should be explained, and its impact on the mapping results of each layer, as well as cumulative mapping results, should be demonstrated and discussed with interested parties. This would mean reducing, rather than eliminating, capacity across a particular area. Such an approach is more appropriate than complete exclusions, as development is not prohibited by state or federal law in these areas. As for local laws, the state legislature recently strengthened the Energy Commission's ability to take a statewide view when reviewing clean energy projects, even where local restrictions may apply.[4]

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[1] See: Lovich, Jeffrey. (U.S. Geological Survey). 2013. Assessing the Long-Term Survival and Reproductive Output of Desert Tortoises at a Wind Energy Facility near Palm Springs, California. California Energy Commission. Publication number: CEC-500-2014-005. Lovich suggested (p. 25) that a factor contributing to the high survivorship of desert tortoise at the studied wind project site is the protected status of the site, which is restricted by fences and gates, dramatically decreasing human activities and trampling by cattle.

[2] CEC "Land-Use Evaluation for Busbar Mapping" presentation (July 18, 2023), Slide 25.

[3] See, e.g.: https://www.audubon.org/magazine/spring-2018/how-new-technology-making-wind-farms-safer-birds.

[4] SB 254 (Becker, 2025) removed the laws, ordinances, regulations, and standards (LORS) conformance process from the Energy Commission's opt-in siting process.

The workshop presentation on a potential "suitability model" for the land-use screens suggests it could be a complex, opaque, and subjective process. It would involve numerous assumptions and the assignment of subjective values and weights to individual layers, which could result in "black box" decision-making. If a suitability model is pursued, it is essential that staff identify and explain their assumptions and subjective judgments, providing supporting evidence, and conduct workshops in which the impacts of these decisions are shown on each screening layer in terms of land area and megawatt potential. These materials should be subject to public comment and appropriate revisions.

Staff should also involve CalWEA and other renewable energy trade groups to consider their judgments regarding the most and least promising development areas, along with other stakeholder input. For example, in comments before the CPUC, CalWEA has identified such development areas based on considerable investigation by its member companies.[5]

A suitability model might, with considerable effort and stakeholder engagement, do a better job than the current method, but might very well provide false precision given the less-than-perfect datasets that it may rely on.[6] Therefore, staff should seriously consider adding nuance to the current approach along the lines discussed above.

Apply out-of-state screens to all out-of-state areas in IRP planning

At the workshop, staff proposed applying land-use screens to the out-of-state resource areas within CAISO's operational footprint, i.e., limited areas of Arizona and Nevada, that would be comparable to, if not the same as, those applied to in-state resources. Staff did not explain why these screens should not be more broadly applied to all out-of-state areas considered in IRP models. While areas beyond the CAISO footprint will not be applicable to busbar mapping, they may refine the out-of-state resources considered in the CPUC's development of resource portfolios.

It is very important not to hold in-state resources to a higher standard than out-of-state resources. Otherwise, California merely exports the land-use impacts associated with its imperative climate goals to other states, while disadvantaging in-state resources that bring job and tax benefits to the state.

In response to a public question, staff noted that it does not evaluate the environmental impacts of transmission lines. Given that hundreds of miles of new or expanded transmission corridors will be required to access resources across the West, and that the most recent

[5] For CalWEA's complete list of promising wind development areas, see CalWEA's CPUC Comments on Busbar Mapping (September 5, 2025), table at p. 6. The most promising near-term development areas were identified in CalWEA's Informal Comments on Busbar Mapping Methodology (7-6-26)

[6] Greater transparency of, or more accessible, information about the data sources employed is needed. Datasets may vary greatly in terms of sources, methods, quality, age, spatial resolution, and intended uses.

portfolio contains a substantial amount of out-of-state capacity, this gap should be addressed as soon as possible.

Provide notice to the CPUC's IRP service list.

Judging by the limited number of questions posed at the workshop, it appears it was not well-attended. This may be because participants in the IRP process were unaware of it. CalWEA recommends that the Energy Commission provide notice of any activities directly related to the CPUC's IRP process to the associated CPUC service list.

Sincerely,

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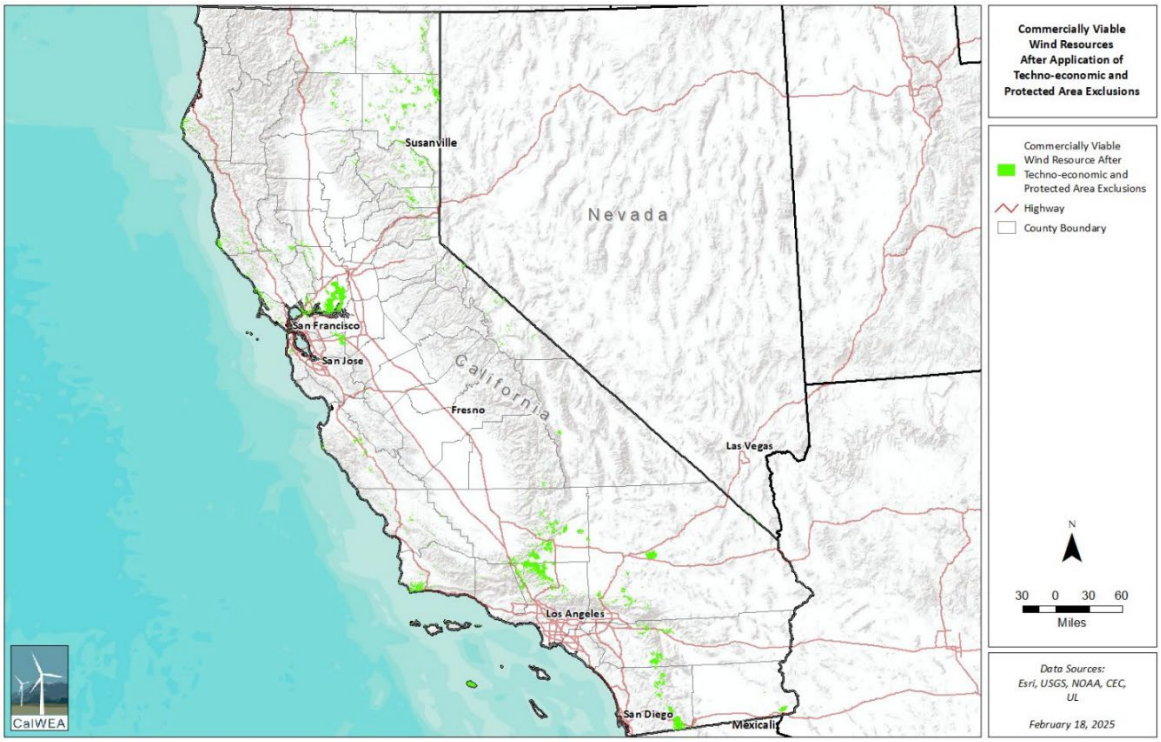
Email: nrader@calwea.org

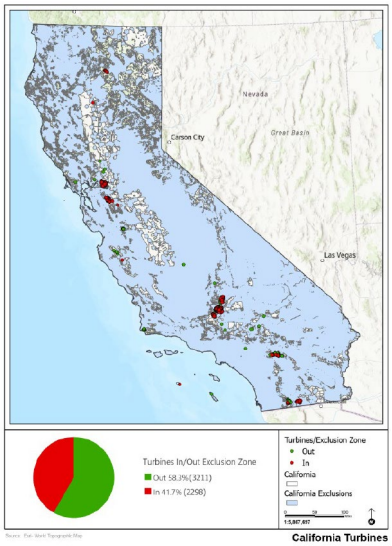
Map 1. Commercially Viable Wind Resources,* CPUC Techno-Econ Screen and CEC Protected Area Layers Applied



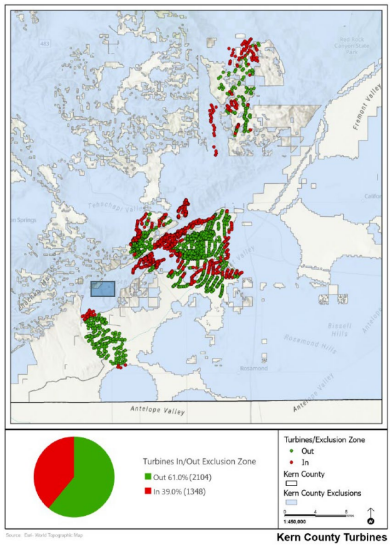
*6.5 m/s wind resource at 120m hub height, UL data (closely approximated by GWA data.) CEC discretionary environmental screens were not applied.

Map 2. Commercially Viable Wind Resources After Applying CEC Discretionary Environmental Screens

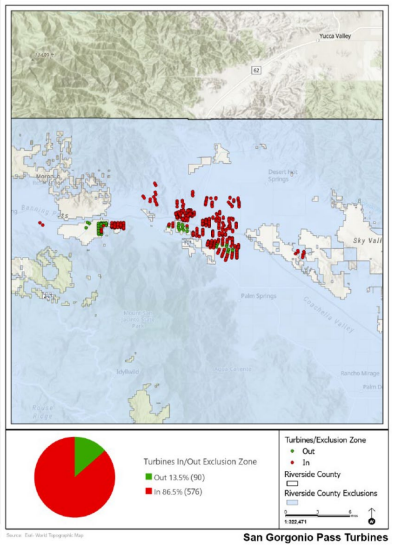
Maps 3-9. CEC's Discretionary Land-Use Screens Would Have Eliminated Significant Existing Project Areas



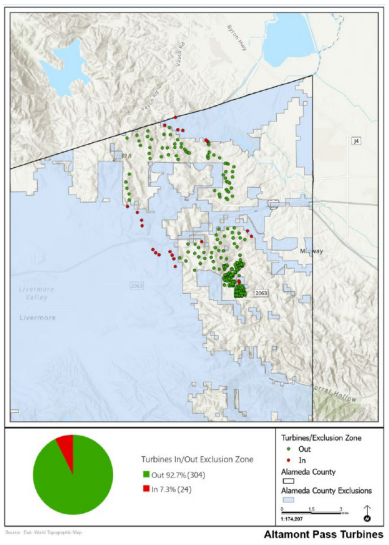
California Turbines



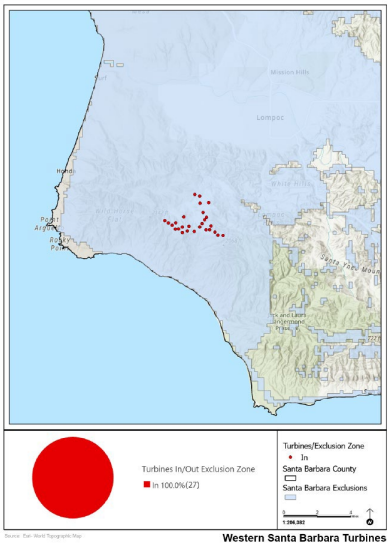
Kern County Turbines



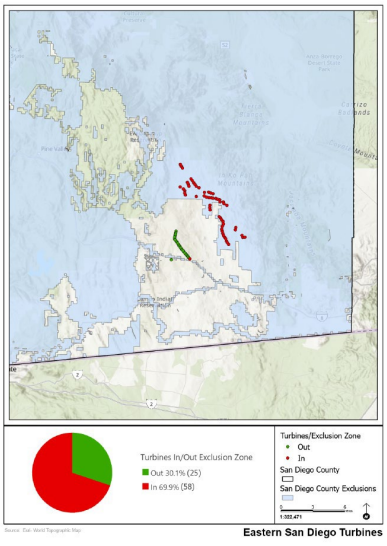
San Gorgonio Pass Turbines



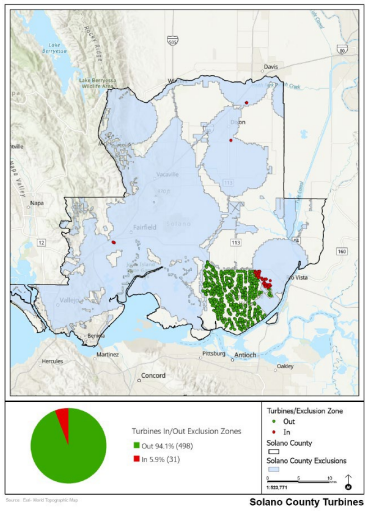
Altamont Pass Turbines



Western Santa Barbara Turbines



Eastern San Diego Turbines



Solano County Turbines