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TNC Comments on Land Use Screens Update Workshop

Additional submitted attachment is included below.



July 21, 2026

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

Re: 26-LUEP-01 Land Use Screens for Electric System Planning: Proposed Updates Workshop

Dear Commissioners and Staff:

The Nature Conservancy (TNC) in California appreciates the opportunity to provide comments on the workshop concerning proposed updates to the land use screens and commends the Commissioners and staff for undertaking an update process. TNC supports California's leadership in advancing a clean, reliable, and affordable electricity system, and we recognize the critical role that the land use screens play in increasing predictability and planning for a 100 percent clean electricity future.

TNC provides the following information in response to the questions posed by staff at the workshop.

TNC Response to Questions:

Question 1. Are there other datasets that we should consider for OOS areas?

For out-of-state areas, TNC recommends that the CEC begin with nationally consistent, foundational datasets and then layer in state-specific data where available. National datasets could include the **Protected Areas Database of the United States (PAD-US)**, **U.S. Geological Survey Gap Analysis Program (USGS GAP)** data, **NatureServe biodiversity and landscape-condition datasets**, the **U.S. Department of Agriculture National Agricultural Statistics Service Cropland Data Layer (USDA NASS CDL)**, and **LANDFIRE / USGS GAP terrestrial ecosystems**.

For both Arizona and Nevada, TNC recommends first consulting with science staff in each state and deferring to the public datasets they identify as most relevant and reliable. TNC can provide contacts to the CEC staff working on this project. The **Arizona Wildlife Conservation Strategy (AWCS)** can serve as a key local conservation dataset for Arizona, and the **Nevada Department of Natural Heritage (NDNH)** dataset can serve as a local conservation source for Nevada. TNC staff in Arizona and Nevada, respectively, recommended these datasets.

Metadata should document dataset purpose, vintage, resolution, update frequency, intended use, and access restrictions.

Question 2. Are there strengths/limitations to the datasets listed that we should take into account?

There will be some limitations to each data set, as we see in California, which is why a layered approach is likely to be the most robust approach to addressing and considering the range of factors today's screens account for.

AWCS as Arizona conservation-planning guidance; and NDNH as Nevada rare-species and ecological-resource information that may require data requests and does not replace field verification.

- Strength of AWCS: Arizona-specific species, habitat, aquatic, riparian, and Conservation Opportunity Area information.
- Limitation of AWCS: Conservation Opportunity Areas should be treated as planning guidance, not automatic regulatory exclusions.
- Strength of NDNH: Nevada-specific rare species, ecosystem, wetland, and sensitive-resource data maintained through Natural Heritage methods.
- Limitation of NDNH: data are dynamic and may require licensing or project-specific data requests.

Question 3. In lieu of a 1:1 matching of in-state datasets, could a single national dataset represent some or all of those components?

As we see in California, one data set is unlikely to be robust and sufficient, so TNC recommends starting with national data sets and layering on a data set of contextual information for each state, as is feasible.

The out-of-state screen should classify datasets by role: protected status, biodiversity value, connectivity, ecological condition, disturbance context, agricultural value, water context, and development opportunity. This is more defensible than relying on one national dataset to represent all conservation concepts.

Question 4. What is the best way to incorporate these factors into a single screen?

A similar methodology to California—even if somewhat simplified—is important for consistency across the CAISO load balancing authority area.

Question 5. For cropland data specifically:

- Is crop production a major land use factor that we should include in NV and AZ.
 - TNC does not have a specific recommendation on accounting for crop production in NV and AZ at this time.
- Do you have recommendations for which of the two methods we should pursue?
 - No comment at this time.

Question 6. What other factors should we include in the Cropland Index Model to account for future land use changes in highly productive agricultural lands? Are there specific datasets you would recommend?

TNC staff who work on groundwater and with several agricultural, county, and groundwater sustainability agency stakeholders recommend starting with the [SGMA Data Viewer tool](#). The SGMA Data Viewer is a mapping application for viewing and downloading SGMA related datasets. The TNC staff members also note that the California Department of Water Resource's (DWR's) new [Subsidence Best Management Practices](#) guide is expected to drive further basin planning and activity, so resources including [this technical report](#) prepared for DWR might be a helpful resource or contextual information.

Question 7. Is bringing in past water import and water source data to indicate water stress/availability to a region valuable, even if it's modeled?

TNC staff recommendations reflect a primary focus on present, expected land use change versus historical or past information as a stand-alone consideration.

Question 8. How should we account for water stress in the Cropland Index Model?

Our recommendations above consider water stress.

Question 9. What are the best ways to account for land that has the most opportunity for repurposing?

TNC does not have further recommendations beyond concurrent use of the Cropland Index Model and the existing environmental layers in the land use screens at this time.

Question 10. Should near-field and deep-field EGS have additional land-use screens applied beyond the protected area layer and techno-economic exclusions to estimate technical resource potential?

TNC supports the creation of land use screens for near-field and deep-field enhanced geothermal systems (EGS). Clean, firm geothermal energy can deliver affordable, reliable energy, support economic growth, and provide cleaner air for our communities while also reducing climate emissions. Slide 44 notes the protected area layer for geothermal allows

development around greater sage grouse habitats, while it does not for solar and wind. We recommend the CEC add sage grouse habitat to the land use screen for conventional geothermal and EGS resources. Research by the [USGS](#) indicates that geothermal development can contribute to population declines of greater sage grouse. Excluding greater sage grouse habitat from geothermal resource potential calculation will help focus geothermal resource potential identification in regions of California where the species isn't present (such as Sonoma County, Imperial Valley), which are also areas of existing commercial interest.

Question 11. Do near-field and deep-field EGS have the same siting flexibility (to avoid potential environmental impacts) as conventional geothermal?

No comment at this time.

Question 12. Should the CEC pursue development of a “suitability model” approach to Land Use Screens?

We recommend the CEC provide further information to interested stakeholders about the potential benefits and use cases of transitioning to a suitability model approach to Land Use Screens, before making a decision to proceed and making a significant investment in staff capacity or consulting resources. The concept has potential merit in energy planning, given the Land Use Screen results are used to inform energy planning at multiple points in the planning process (e.g., capacity expansion modeling inputs, technical resource potential at substations in busbar mapping). For example, it's possible that a binary approach may be sufficient as a capacity modeling input for estimating technical resource potential at the transmission zone-scale. A suitability modeling approach may have added benefits in producing technical resource potential at the substation-scale, as it could reflect both binary exclusions (such as the protected area layer) and a gradient of other screening considerations that are relevant and important to resource mapping and transmission planning.

However, as noted in the CEC presentation, suitability models are sensitive to the data used, assumptions, and weighting. Investment in an overall suitability modeling framework for the Land Use Screens would require additional public process steps that allow for review of raw data inputs, potential approaches to weighting, example mapping outputs, and a clear explanation of implementation, with sufficient time to resolve potential technical issues before integrating into IRP or other modeling analyses.

Question 13. How would a suitability model for renewable energy best be used in energy and land use planning processes?

No further comment at this time.

Question 14. What data or other information could be included to improve identification of areas for renewable resource build that is not reflected in the current land use screens?

No further comment at this time.

Question 15. Is there a role in energy planning processes for both “binary” land use screens and a more nuanced type of suitability model for renewable energy?

No further comment at this time.

Conclusion

The Nature Conservancy in California appreciates the opportunity to submit these comments and is available to help the CEC solicit and evaluate data as it explores updates to the Land Use Screens. Lastly, TNC recommends that future Land Use Screens workshops and related meetings be noticed in the CPUC’s IRP proceeding service lists.

Respectfully submitted,

/s/

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