



**To:** Illinois Power Agency  
**From:** American Farmland Trust  
**RE:** Response to IPA on Opportunities for Protecting Farmland and Advancing Smart-Solar Siting within the 2022 Long-Term Plan  
**Date:** February 28, 2022

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## Background

American Farmland Trust (AFT) saves the land that sustains us by protecting farmland, promoting sound farming practices, and keeping farmers on the land.

Illinois has significant potential for generating clean solar energy. The passage of the Climate and Equitable Jobs Act expands those opportunities and positions the state to be a regional leader in clean energy development.

As Illinois moves to capture the environmental, economic, and energy benefits of this clean, renewable energy, we must also minimize impacts on Illinois's productive lands. Flat, open farmland is ideal for solar array siting. However, development of farmland threatens food production, food security and local economies.

Widespread deployment of utility-scale solar, including both distributed generation and large-scale projects, presents opportunities and challenges for farmers and rural communities across Illinois. With the right planning, project design, and farmer and community engagement, utility-scale solar can be developed in ways that reduce or avoid significant impacts to active farmland and agricultural communities.

## Advancing Smart-Solar Siting and Dual-Use Opportunities in Illinois

Illinois is one of the most productive agricultural states in the nation. Still, more than 244,000 acres of farmland were converted to developed uses in the past two decades alone<sup>1</sup>. One impact of this development is the loss of smaller production acres that are important for diversifying agricultural production and local food efforts. Currently, more than 90% of the food consumed in Illinois is produced elsewhere<sup>2</sup>.

Without attention to how to best local solar development while mitigating impacts to farmland, new solar installations may inadvertently contribute to these trends and limit local agricultural opportunities.

AFT believes there is a middle ground that can promote the development of solar energy while maintaining food production. This can be accomplished through smart-solar siting and includes practices such as minimizing solar development on prime and locally important farmland, promoting dual-use solar energy installations, and working with farmers to identify opportunities

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<sup>1</sup> Freedgood, J., Hunter, M., Dempsey, J. and Sorenson, A. 2020. Farms Under Threat: State of the States. Washington D.C.: American Farmland Trust. [https://s30428.pcdn.co/wp-content/uploads/sites/2/2020/09/AFT\\_FUT\\_StateoftheStates\\_rev.pdf](https://s30428.pcdn.co/wp-content/uploads/sites/2/2020/09/AFT_FUT_StateoftheStates_rev.pdf)

<sup>2</sup> Chicago Metropolitan Agency for Planning. 2012. The Local Food System. Local Technical Assistance Program. [https://www.cmap.illinois.gov/documents/10180/117119/FY12-0115+LOCAL+FOOD+BROCHURE\\_nospread.pdf/55c0aeb5-118a-4e83-a99a-d1d27093d4c7?t=1386802006000](https://www.cmap.illinois.gov/documents/10180/117119/FY12-0115+LOCAL+FOOD+BROCHURE_nospread.pdf/55c0aeb5-118a-4e83-a99a-d1d27093d4c7?t=1386802006000)



to diversify incomes through energy production while protecting the integrity of farming operations.

Smart-solar siting can also have important co-benefits related to improved environmental outcomes and climate resilience. This includes expanded habitat for pollinators and wildlife, improved soil health and better water retention.

### **7.4.3 Traditional Community Solar**

AFT applauds the inclusion of “agriculturally-sensitive provisions” as one of the factors which guides the prioritization of Traditional Community Solar within the 2022 Long-Term Plan. We believe that this definition could be further expanded to include specific elements of smart-solar siting. These elements could then be used to engage solar installers to guide initial project development well ahead of permitting and installation.

This further specification of agriculturally-sensitive provisions should include:

- 1) Location of solar installation on built environment areas of farms and away from prime farmland, pollinator areas and habitat areas. This includes locating solar development on structures, rooftops, carports, paved areas, and other non-production areas on farms.
- 2) Opportunities for agricultural dual-use or agrivoltaics. This can be through the design of solar systems which protect existing production systems or which facilitate the establishment of new agrivoltaic systems and market opportunities, such as specially crop production or grazing.
- 3) Projects which actively work with farmers and communities to support agricultural viability, including through offering support to implement best management practices to protect soil health when siting solar on farmland.
- 4) Projects which include farmland protection through easements and other means such as efforts that promote land access and land transitions for new and beginning and socially disadvantaged farmers.

Inclusion of each of these additional considerations in a project design should be rewarded with an additional point. This could be accomplished by expanding the existing the scoring system so that projects receive between 1-5 points depending on how well they satisfy the provisions or by adding new points to the scoring system, valued at one point each, which cover the considerations above.

Thank you very much for your consideration.

Sincerely,

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