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01/22

February 28, 2022

Illinois Power Agency  
105 West Madison Street, Suite 1401  
Chicago, Illinois 60602

Re: Feedback on Section 7.4.3 of IPA's Draft 2022 Long-Term Renewable Resources Procurement Plan

Illinois Power Agency Director Anthony Star:

The Nature Conservancy submits the following comments in response to the call for comment on the Illinois Power Agency's draft 2022 Revised Long-Term Renewable Resources Procurement Plan, which reflects substantial changes made to the Renewable Portfolio Standard through Public Act 102-0662.

The Nature Conservancy is one of the leading conservation organizations working in Illinois and around the world to protect ecologically important lands and waters for nature and people. The Illinois chapter has worked to advance policies and practices that secure lasting conservation outcomes for our state.

The Illinois Power Agency requested stakeholder feedback on a proposed scoring system for traditional community solar, as outlined in section 7.4.3 of the Draft 2022 Long-Term Renewable Resources Procurement Plan. In response, The Nature Conservancy in Illinois (TNC) would like to provide input on (1) the proposed scoring system and (2) the proposed criterion on agriculturally sensitive provisions and pollinator-friendly habitat.

TNC supports the use of a scoring system to rank applications if the block capacity is exceeded. In particular, TNC is supportive of criteria to incentivize projects sited on brownfields and with agriculturally sensitive provisions. A simplified approach that prioritizes larger, more cost-effective projects would be a missed opportunity to incentivize traditional community solar projects in Illinois that minimize impacts on wildlife, habitat, natural carbon stores, and prime farmland.

According to the U.S. Department of Energy's Solar Futures Study<sup>1</sup>, an estimated 320,071 acres of land will be required for solar development in Illinois to meet the country's clean energy goals. Maximizing renewable energy development on disturbed and contaminated lands provides a key way to reduce the overall land-use impacts of this development. In Illinois, the U.S. DOE calculates that we have over 2.3 million acres of disturbed land, after filtering out parcels that are likely too small for solar development, and 35,060 acres of contaminated land that could potentially be used for solar development. Based on this analysis, Illinois should contain ample disturbed and contaminated land to support the estimated total buildout of solar by 2050 across the state. The inclusion of a criterion to award points for projects sited on brownfields is an important way to minimize the overall land-use impacts of new solar projects.

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<sup>1</sup> See the supporting report for the Solar Futures Study: "Environmental and Circular Economy Implications of Solar Energy in a Decarbonized U.S. Grid" (available at <https://www.nrel.gov/docs/fv22osti/80818.pdf>)

In addition to awarding points for projects sited on brownfields, TNC encourages IPA to consider assigning 2 points to projects sited on disturbed lands, as classified by U.S. DOE's analysis. This would further discourage new development on natural areas and prime farmland across the state. Croplands are frequently targeted for new solar development because they are flat, open, and mostly undeveloped.<sup>2</sup> Prioritizing new development on disturbed lands can help to minimize conflicts with food production, the agricultural economy, and native habitat while also returning disturbed lands to more productive use.

TNC supports the inclusion of efforts to incentivize agriculturally sensitive provisions. However, it is of equal or greater importance to ensure that new solar development avoids impacts to Illinois' natural areas, habitat, and biodiversity. Widespread land conversion has already greatly diminished the extent of Illinois' original ecosystems, which heightens the importance of avoiding siting in conservation areas and/or any area with a high incidence of state or federal threatened or endangered species. This includes areas with a protected land use designation, nature conservation areas, important habitat or areas with high ecological values, and connected lands. In Illinois, this also includes Illinois' Conservation Opportunity Areas (COAs), which are the priority areas the state has identified for conserving Illinois' species in greatest need of conservation. To address this issue, we suggest the following text to amend the second criterion:

*Projects that are committed to habitat conservation and agriculturally-sensitive provisions, such that they avoid siting in conservation areas and prime farmland. (2 points)*

We recommend that there should be a separate criterion specifically dedicated to encouraging the co-location of solar arrays with pollinator-friendly habitat, owing to the importance of encouraging this practice. Efforts to combine native vegetation with solar facilities can both increase biodiversity and improve ecosystem services. Planting native prairie with solar can increase pollinator benefits and carbon storage and reduce water and sediment runoff.<sup>3</sup> An additional 2 points should be assigned to any project that enhances the site value with pollinator-friendly habitat in accordance with Illinois' Scorecard. Text for this criterion should specify the need to comply with the Pollinator Friendly Solar Site Scorecard for Illinois:

*Projects that proactively enhance habitat value with pollinator-friendly habitat, as defined by Pollinator Friendly Solar Site Scorecard for Illinois (525 ILCS 55). (2 points)*

To avoid the most catastrophic impacts of climate change and related impacts to nature, we must achieve net zero greenhouse gas emissions by mid-century. We cannot succeed in getting to net zero without a rapid buildout of renewable energy. By directing renewable energy development to low-impact areas, we can take advantage of its climate and environmental benefits, while protecting our lands and waters for future generations.

We appreciate the opportunity to provide feedback.

Sincerely,



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<sup>2</sup> See Walston et al., 2020: "Modeling the ecosystem services of native vegetation management practices at solar energy facilities in the Midwestern United States." *Ecosystem Services*, 47.

<https://www.sciencedirect.com/science/article/pii/S2212041620301698?via%3Dihub>

<sup>3</sup> See Walston et al., 2020: "Modeling the ecosystem services of native vegetation management practices at solar energy facilities in the Midwestern United States." *Ecosystem Services*, 47.

<https://www.sciencedirect.com/science/article/pii/S2212041620301698?via%3Dihub>