American Farmland Trust
SAVING THE LAND THAT SUSTAINS US

To: Illinois Power Agency
From: American Farmland Trust
RE: Feedback for IPA's Long-Term Renewable Resources Procurement Plan
Date: September 29, 2025

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 is one of the most productive agricultural states in the nation, with more than 21 million acres of prime farmland supporting over 71,000 farms, 482,000 jobs, and contributing nearly $120.9 billion in annual economic output. At the same time, Illinois is emerging as a leader in solar energy generation, with over 4,800 megawatts of installed solar capacity as of August 2025 and more than 5,000 megawatts in development or under construction.[1]

These two critical sectors both require land. Since 1950, [2] Illinois has lost more than 3.6 million acres of farmland to development, and an additional 363,000 acres are projected to be converted by 2040, with over 80% of that loss occurring on the state's most productive, versatile, and resilient soils.[3] Additionally, AFT's *Farms Under Threat: 2040* analysis found that without policy changes, 83% of new solar will be sited on agricultural land, with nearly half located on the most productive farmland for growing food and other crops.[4]

The overlap is not coincidental. The very qualities that make farmland productive—flat, sunny, well-drained land near existing energy infrastructure and population centers—also make it attractive for solar development. Without thoughtful siting and design backed by good policy, solar growth risks accelerating farmland loss and undermining long-term agricultural viability.

AFT believes there is a middle ground that can promote the development of solar energy, protect environmental outcomes and support agricultural production. AFT works to advance

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[1] Ederm D., Gregg, F., Nuthulapaty, S., and Sherman, E. 2025. *Illinois Solar Map*. Illinois Clean Jobs Coalition and Chi Hacknight. https://ilsolarmap.com/about
[2] Illinois Department of Agriculture, Bureau of Land and Water Resources. 2024. *Farmland Protection*. https://agr.illinois.gov/resources/farmlandprotection.html
[3] Beck, S., Hunter, M., Murphy, R., Nogeire-McRae, T., Shutts, S., and Sorensen, A. 2022. *Farms Under Threat 2040: Choosing an Abundant Future*. Washington, D.C.: American Farmland Trust. https://farmlandinfo.org/publications/farms-under-threat-2040/
[4] Hunter, M., Nogeire-McRae, T., and Sorensen, A. 2022. *Potential Placement of Utility-Scale Solar Installations on Agricultural Lands in the U.S. to 2040*. Washington, D.C.: American Farmland Trust. https://farmlandinfo.org/wp-content/uploads/sites/2/2023/03/AFT_FUT2040-solar-white-paper.pdf

"Smart Solar℠" policy to enable the transition to renewable energy while strengthening farm viability and protecting our nation's farmland. Smart solar minimizes impact on agricultural land and makes any solar built on farmland more economically beneficial for farmers and for agriculture. AFT has developed the following smart solar principles:[5]

- Prioritize solar energy development on rooftops, carports, irrigation ditches, brownfields, or other land not well suited for agriculture to help minimize the impacts of solar energy on our nation's best agricultural land and farm businesses.
- If solar energy is developed on farmland or ranchland, implement policies and practices to protect soil health and conserve water, especially during construction and decommissioning, to ensure opportunities for farming in the future.
- Advance development of agrivoltaic projects that integrate agricultural production into solar arrays so production continues underneath and/or between rows of panels throughout the life of the project.
- Ensure inclusive stakeholder engagement so projects strengthen farm viability and reflect farmer interests, including underserved producers that face barriers to accessing land and other resources.

Agrivoltaics, in particular, is a promising, emerging, and rapidly evolving area of energy development that integrates agricultural production into solar arrays to keep land in farming as solar development advances. However, agrivoltaics currently represent a small share—less than 5%—of solar capacity in the U.S.[6] And while agrivoltaic research is still evolving, conventional solar development is advancing at a rapid pace.

Because many agrivoltaic systems cost more than traditional ground-mounted solar arrays, or otherwise need to be designed differently to accommodate the farm operation, incentives are often needed to increase their development. For policies, like incentives, to yield true agrivoltaic projects that support a farm operation, especially when public funding is involved, careful choices must be made about what qualifies and how these incentives and programs are structured. AFT's goals in engaging with agrivoltaic incentive programs is to:

- Ensure farming can take place within solar arrays for their full life (30-40+ years) and beyond, and that there is value for the farm production component, not just the energy production
- Protect and conserve soil and water resources
- Develop agrivoltaic projects that contribute to the broader farm and ranch economy
- Create projects that are designed and installed in ways that give farmers the flexibility to change productions systems or which agricultural products they produce in response to market demand or other factors throughout the full lifetime of the solar array

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[5] American Farmland Trust. 2025. *Smart Solar℠ Principles*. https://farmland.org/smart-solar

[6] Estimate of agrivoltaics as less than 5% of solar projects is based on National Renewable Energy Laboratory InSPIRE Agrivoltaics Map (filtered for "Crop Production" & "Grazing") estimate of 7.9 GW of agrivoltaics capacity and Solar Energy Industries Association Q4 2024 Solar Market Insight Report estimate of 219.8 GW existing solar capacity. This may be an undercount, but the current share is somewhere between ~4%-7%.

- Expand the breadth of production systems and types of crops or livestock that are integrated into solar arrays across the U.S.
- Generate relevant and realistic policies so developers are effectively incentivized to innovate and incorporate agricultural production and work to achieve these goals

Incentive programs that have the highest chance of success at achieving the above stated goals have five key features:

1. A clear and strong definition for what qualifies as an agrivoltaic project, such as the recommended definition on page four of this document
2. An incentive whose size is calculated based on 1) the additional cost incurred to modify the array to successfully integrate the agricultural production system, with higher incentives offered for integrating production systems that sustain and advance the local farm economy, and 2) the percentage of the array in agricultural production, with higher incentives for arrays that keep more or all of the land in production
3. Authority and capacity for annual monitoring and compliance, with penalties and/or clawback provisions should the acreage in agricultural production decline or cease
4. Regular review and periodic recalibration of incentive amounts and program rules to ensure program goals are being met.
5. Carveouts, greater incentives, or prioritization for applications submitted for projects that will be farmed by underserved producers, young and beginning farmers, and/or the prior tenant-farmer.

While incentives can be offered for agrivoltaic projects through procurement solicitations, this may not be the most effective way to achieve the above goals because all five criteria may not be able to be met. Therefore, in addition to the proposed changes in the Draft 2026 Long-Term Renewable Resources Procurement Plan, many of which present a step forward for incentivizing agrivoltaic projects, AFT recommends creating additional incentive programs that can meet all of these criteria. Additionally, below are AFT's recommendations to build on the positive proposals in the draft Procurement Plan to increase agrivoltaic development in Illinois.

RECOMMENDATIONS

Incentivizing Agrivoltaic Projects

Increasing development of agrivoltaic projects is a key way to maintain agricultural viability during increased solar energy development. AFT strongly supports agrivoltaic incentives, and recommends the Illinois Power Agency (IPA) consider several ways to effectively incentivize agrivoltaic projects in this 2026 Long-Term Renewable Resources Procurement Plan:

Increase Points in ways Sensitive to Agrivoltaic Project Cost and Difficulty. AFT appreciates that the IPA proposed increasing the scoring incentive for projects incorporating agrivoltaics from 1 to 2 points and added a -2 point subtractor for projects sited on greenfields that do not include agrivoltaics. Providing strong incentives, paired with disincentives, to encourage continued agricultural production under solar arrays sited on productive agricultural land is critical to get developers to put the time and effort in to design agrivoltaic projects. To

further improve this incentive structure, AFT recommends awarding 2 points for agrivoltaics grazing and offering additional, higher points for projects that integrate crop production. Agrivoltaic projects that integrate crop production offer greater benefits than grazing alone by maintaining active cultivation of farmland and contributing to food and fuel production, but they are less common because they require more complex design, higher upfront costs, and greater operational challenges to successfully balance energy generation with crop yields. To successfully encourage more diverse production systems under solar arrays than just sheep grazing, the IPA must acknowledge the increased costs and complexities of non-grazing agrivoltaics systems by providing an additional incentive for such projects.

AFT suggests the following language:

> **2026 Long-Term Renewable Resources Procurement Plan: 7.4.3.1 Traditional Community Solar Scoring Guidelines (Page 189-190)**
>
> *1. Built Environment – Maximum of 4 points permitted*
>
> a. *Sited on "contaminated lands" as defined by the United States Environmental Protection Agency.*[372] *(Add 2 points)*
> b. *Sited on rooftops or other existing structures. (Add 3 points)*
> c. *Sited on a brownfield, as defined in Section 1-10 of the Act and further clarified in Section 5.4.2 of the Plan.*[373] *(Add 2 points)*
> d. *Commitment to utilize grazing agrivoltaic dual-use solar.*[374, 375, 376] *(Add 2 points)*
> e. *Commitment to utilize non-grazing agrivoltaic dual-use solar (Add 3 or 4 points)*
> f. *Commitment to pollinator friendly habitat, as defined in in the Pollinator Friendly Solar Site Act (525 ILCS 55).*[377] *(Add 1 point)*
> g. *Sited on a greenfield (if not utilizing 1.d. or 1.e., and not sited on contaminated land).*[378] *(Subtract 2 points)*

Consider Increased Size Allowance. One option to further incentivize agrivoltaics is to expand eligibility for the community solar designation to include agrivoltaic projects that are larger than conventional community solar projects. For example, in 2023, Maryland made its community solar program supporting projects of up to 2MW permanent, but allowed agrivoltaic systems of up to 5MW both to qualify and to cluster more than they would allow for with conventional systems. Such additional design or size flexibilities could also be effective in Illinois. If the IPA were to pursue this approach, it would be critical to maintain a clear and robust definition of agrivoltaics – explicitly excluding projects that integrate pollinator habitat alone – to ensure only projects maintaining meaningful agricultural production qualify for these attractive incentives.

Create an Agrivoltaic Carveout. Another option to incentivize agrivoltaic development would be to carve out capacity specific to agrivoltaic projects in procurement. Such a carveout should

be guided by a strong definition of agrivoltaics, include best practices to protect soils during construction and installation, and offer tiered incentives that increase with the cost and difficulty of integrating the type of production system into the array. Two resources to inform a well-designed carveout are: AFT's recommended agrivoltaic definition[7] and past recommendations[8] to increase development of a diversity of agrivoltaic production systems. This recommendation is similar to one made by Solar and Farming Association (SAFA) on June 20th, 2025.[9]

Definition of "Agrivoltaics"

AFT appreciates that the definition of agrivoltaics in Appendix C of the current Program Guidebook clearly establishes agricultural production as a required component and emphasizes fully integrated systems. To strengthen this definition and ensure that projects awarded points for "agrivoltaics" deliver the full benefits of a true dual-use system, we recommend requiring agricultural production on 100% of all farmable acres inside the perimeter fence rather than the current 50% threshold to achieve the full point increase. Other projects from 50-100% should receive points proportionate to the percentage of the footprint in active agricultural production, with 50% coverage serving as the minimum threshold to qualify. This approach would encourage more robust integration of agriculture and solar while providing developers with a clear, scalable incentive structure. Suggested revisions to implement this change are included below.

> **2026 Long-Term Renewable Resources Procurement Plan: 7.4.3.1 Traditional Community Solar Scoring Guidelines (Page 189-190)**
>
> 1. *Built Environment – Maximum of 4 points permitted …*
>   d. *Commitment to utilize agrivoltaics or dual-use solar.*[374, A, 375, 376,] *(Add up to 2 points)*
>
> *A – Projects will receive points proportionate to the percentage of the footprint in active agricultural production, with 50% coverage serving as the minimum threshold to qualify. For example, 50% coverage of farmable acres will receive 50% of the total point allowance.*

Definition of "Active Grazing"

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[7] American Farmland Trust. 2025. *Policy Recommendations to Increase Agrivoltaic Development*. https://farmland.org/files/aft_final_policy_recommendations_to_increase_agrivoltaic_development_definition_and_incentives_final-2.27.25.pdf

[8] American Farmland Trust. 2024. *Recommendations for State and Local Governments to Advance Smart Solar Policy. https://farmland.org/files/aft-recommendations_for_state_and_local_governments_to_advance_smart_solar_policy-(1).pdf*.

[9] Solar and Farming Association. 2025. *Proposal to Establish a Dedicated Agrivoltaics Project Category within the Illinois Shines Program*. https://ipa.illinois.gov/content/dam/soi/en/web/ipa/documents/ch7-safa.pdf

AFT appreciates the Agency's recognition that verifying "active grazing" under the current framework has presented challenges at the Part II application stage. We agree that the goal should be to ensure grazing is occurring in a meaningful, agronomic way rather than simply meeting paperwork requirements. We also understand the reasoning for a Part II application to be filed in a timely manner for REC generation to begin. AFT recommends agrivoltaic incentive programs and policies are designed to ensure that agricultural production also continues throughout the life of the project, with clawbacks and penalties should it cease, and recommends that periodic verification is performed throughout the life of the project.

To strengthen implementation, we recommend the following definition:

> *For the purposes of verifying grazing-based agrivoltaics projects under the Agrivoltaics (AgPV) scoring criteria, "active grazing" means the presence of livestock utilizing on-site vegetation as forage during the defined growing season (April 1 – October 31 in Illinois, with reasonable flexibility for local conditions). For projects committing to agrivoltaics, evidence of active grazing must be demonstrated at the time of Part II application, or, if the Part II application is submitted within 90 days of the close of the growing season, grazing must commence no later than the start of the subsequent growing season.*

We caution against relying on contracts alone as sufficient evidence of active grazing. While contracts between landowners and herd owners are important, they do not guarantee that grazing will take place within a specific timeframe or in a manner that provides the intended benefits of an agrivoltaic system. Developers and their EPCs must understand the importance of having established vegetation not only to meet their agrivoltaic commitments and ensuring their grazing partners are successful, but also to protect the soil during all portions of construction. Without clear expectations, projects risk scenarios where animals are brought to sites but are sustained primarily with hauled feed rather than site vegetation, which undermines both the agricultural and ecological objectives of grazing. While contracts can be part of the evidence, site inspections—particularly during the first year of operation—would provide assurance that grazing is occurring as intended.

If projects fail to meet grazing requirements within the specified timeframe, or cease agricultural activity at any point throughout the REC delivery period, the Agency should outline claw back provisions to ensure compliance and preserve the integrity of the scoring system. This verification and enforcement should continue periodically throughout the life of the project, or the agency risks providing a benefit without receiving the promised activity—which in this case is to keep land in production.

Due to the intermittent nature of grazing a solar array, the definition and any resulting implementation (e.g., inspections) to ensure the land stays in production should be designed to ensure that true grazing operations still qualify. We would welcome the Agency reaching out to further clarify this point if necessary.

Thank you for your consideration of this feedback, and for soliciting comments on these proposed changes. We are happy to discuss any of our comments in greater detail. Please let us know if there is any additional information or assistance that we can provide.

Sincerely,
Alan Bailey
Midwest Solar Specialist
American Farmland Trust
abailey@farmland.org