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September 26, 2025

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

RE: Comments on the Draft 2026 Long-Term Renewable Resources Procurement Plan

The Illinois Farm Bureau (IFB) appreciates the opportunity to comment on the Illinois Power Agency's (IPA) draft 2026 Long-Term Renewable Resources Procurement Plan. IFB is the state's largest general farm organization representing three out of every four Illinois farmers. Thanks to the quality of our soils and the ability of our farmers, Illinois ranks first in the nation in soybean production and second in corn production. However, Illinois farmers are facing unprecedented land-use change challenges resulting from proposed renewable energy projects, many of which are supported by programs outlined in the draft Plan.

IFB policy, established through our grassroots member driven process, supports renewable energy generation as a component of the energy portfolio of our state and country. IFB policy also supports efforts to locate renewable energy projects on marginal or underused lands, brownfields, other non-tillable properties, roof tops, and parking areas rather than on productive, tillable farmland. Our organization also supports prioritizing public funding towards solar projects with a verified agrivoltaics component. It is with these policies in mind that IFB submits this feedback to IPA.

Section 5.5.2 of the draft Plan seeks feedback on how the IPA may improve participation of brownfield site photovoltaic projects. As mentioned previously, IFB policy supports efforts to locate solar energy projects on marginal or underused lands and brownfield sites. IFB is pleased that the draft plan mentions IPA working with other state agencies to identify brownfield sites that could be potentially developed into solar projects. Having an established list of potential brownfield sites will simplify the process of identifying those sites for solar developers, aid in their development, and hopefully improve participation in the program.

IPA also asked for feedback on procurement approaches that would help ensure participation of brownfield site photovoltaic projects. While IFB does not have specific expertise in the design of procurement approaches, our organization would support IPA utilizing any procurement process that improves participation by brownfield photovoltaic sites. Doing so will minimize the impact of additional solar development on productive, tillable farmland.

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Section 5.5.3 asks for input regarding procurements of non-photovoltaic community generation projects. IFB supports IPA conducting procurements from community generation projects that utilize generation technologies other than photovoltaics because these other technologies may have less intensive land use requirements. Biodiesel, dedicated energy crops, and biomass generation technologies may also provide the added benefit of additional economic opportunities for farmers and rural communities. IFB encourages IPA to conduct procurements that will provide opportunities for these other types of community generation projects.

Section 7.4.3.1 of the draft Plan outlines changes to the scoring of traditional community solar project applications. IFB supports the IPA increasing the points available for utilizing agrivoltaics from 1 point to 2 points. As stated previously, IFB policy supports prioritizing public funding towards solar projects with verified agrivoltaics. Increasing the points available helps create additional prioritization for agrivoltaics.

IFB also supports the subtraction of points for projects constructed on a greenfield that do not commit to using agrivoltaics or pollinator habitat. Subtracting two points from those projects that will be constructed on a greenfield without the benefit of agrivoltaics or pollinator habitat will help to prioritize projects that are located on properties other than highly productive, tillable farmland.

Section 7.4.3.1 of the draft plan also specifically requests feedback on the definition of active grazing. "Active grazing" can be difficult to define because of the uncertain nature of farming and the impact of weather. Agrivoltaic projects utilizing grazing should be allowed time after the project is constructed to establish sufficient vegetation to support grazing. Overgrazing and poor management may also lead to a loss of beneficial vegetation, soil fertility issues, and erosion. Active grazing should include grazing animals on the property during the growing season through managed grazing techniques. It is likely not feasible for the animals to continue to graze during the winter months when the growing season has ended or when vegetation needs to rest and regrow following a grazing period. Animals should be moved from the site or fed supplemental hay or feed not produced on-site to ensure animal health and welfare are maintained during these periods.

IPA also asked if a contract between a landowner and a herd owner would be sufficient to demonstrate active grazing. IFB would point out that the contract for grazing may not be between the landowner and the herd owner. Depending on the terms of the lease for the solar project, the solar farm owner/operator may be the entity that contracts with the herd owner. Having a contract between the proper parties should be sufficient to demonstrate that active grazing will occur following the establishment of vegetation. It can also demonstrate that grazing will occur during the growing season or after areas have rested between grazing periods. However, additional inspections by IPA would be beneficial to confirm that grazing is occurring during the growing season when grazing would be expected or is needed for proper vegetation management on the site.

IFB would also suggest that a grazing plan could be included as part of the Agrivoltaics Plan information included in a Part I application. A grazing plan would outline expected species of

animal, timeline for establishment of vegetation, planned stocking rate, and expected beginning and duration of grazing periods. While any agricultural plan is subject to change due to weather conditions or other factors, the plan would help demonstrate the commitment and preparation of the owner/operator to implementing agrivoltaics. It would also provide information that the IPA could use to plan the timing of inspections to ensure that grazing is occurring on the project as outlined in the grazing plan.

Thank you for your consideration of these comments. Implementing a Plan that encourages development on property other than productive, tillable farmland and that encourages Agrivoltaics will help reduce the impact of land-use change currently facing Illinois' farmers. Please do not hesitate to contact me should you have any further questions.

Regards,

Bill Bodine
Dir. of Business and Regulatory Affairs
Illinois Farm Bureau