



June 29, 2023

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

RE: Illinois Farm Bureau – Chapter 7 LTP Feedback

Please accept this feedback from the Illinois Farm Bureau® (IFB) regarding the development of the 2024 Long-Term Renewable Resources Procurement Plan.

IFB is Illinois' largest general farm organization representing more than 70,000 voting members, or three out of every four Illinois farmers. IFB policy, implemented by our grassroots members, supports wind and solar energy as a component of the energy portfolio of the United States. However, IFB policy on solar energy also specifically states that we support "efforts to locate solar energy projects on marginal or underused lands, including brownfield sites, highway rights-of-way, entrance and exit ramps, rest areas, welcome centers, embankments, IDNR non-tillable properties, or urban and rural rooftops, vacant lots, farmsteads, and/or over parking areas rather than highly productive, tillable farmland." This policy guides the following responses to questions posed by the Illinois Power Agency regarding the Traditional Community Solar Scoring Guidelines.

- 1. Should the Agency consider another approach to discourage the development of TCS projects on greenfields or land that is available for conservation? Please provide details on what approach the Agency might use to ensure development does not coincide with this type of land.**

As stated previously, IFB policy supports efforts to locate TCS projects on marginal or underused lands, including non-tillable land near highways, rest areas, entrance and exit ramps, welcome centers, embankments, non-tillable properties managed by the Illinois Dept. of Natural Resources, and vacant lots. Creating a scoring system that rewards TCS projects located on these types of properties as well as those included in the current TCS scoring criteria will encourage development in those locations rather than on highly productive farmland. The Agency should create a scoring criterion that adds points for a project sited on these types of properties or include these property types in the current scoring criteria for Built Environment. Proof of site control and site maps could be used to verify that projects are located on the types of properties mentioned.

- 2. Do stakeholders find that commitments to scoring points both under Agrivoltaics (scoring criterion 1.c) and the Pollinator Friendly Habitat (scoring criterion 1.d) are at odds? If so, please explain why and how the Agency can amend these scoring criteria to solve for this issue.**



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"Improve the economic well-being of agriculture and enrich the quality of farm family life."

Commitments made for agrivoltaic and for pollinator friendly habitat may not be at odds with one another depending on the design and details of the proposed TCS project. For example, the definition of agrivoltaics used in the current TCS scoring guidelines requires at least 50% of the project footprint to feature agricultural production. This may not be at odds with commitments for pollinator friendly habitat depending on the design and utilization of pollinator habitat on the remaining footprint of the solar farm. A project could commit to provide pollinator friendly habitat on areas of the solar farm that are not suitable for or currently in agrivoltaic production. The pollinator friendly habitat would need to continue to be sufficient enough and managed in a way that allows it to qualify as a pollinator friendly solar site. If a project commits to use both agrivoltaics and pollinator habitat, plans should be provided outlining how the practices will be managed and the amount of project footprint dedicated to each.

3. Please provide any other feedback on changes to the TCS scoring guidelines that might be relevant to ensuring that the multiple goals of TCS project development – encouraging solar development state-wide, best utilizing land in the state that cannot be otherwise utilized for conversation/farming/etc., and diversifying project attributes amongst TCS projects.

IFB supports existing scoring guidelines that encourage TCS projects to be located on brownfields, contaminated lands, rooftops or other structures, and marginal or underused lands rather than highly productive farmland. We also support existing guidelines to encourage the incorporation of agrivoltaics and pollinator friendly habitat into TCS projects. The Agency should create additional scoring criteria for locating TCS projects on the types of properties supported by IFB policy to further encourage projects to be located on land other than highly productive farmland. The Agency could also increase the minimum points allowed for Built Environment to create additional emphasis on and further encourage projects located on lands or in areas that are not highly productive farmland or that incorporate continued agricultural production through agrivoltaics.

Thank you for the opportunity to provide this feedback. Should you have any questions, please contact me at the contact information below.

Sincerely,

A handwritten signature in black ink, appearing to read 'Bill Bodine', with a stylized flourish at the end.

Bill Bodine
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