

July 19, 2019

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

The Illinois Nature Conservancy's Comments on the IPA's 2019 Long-Term Renewable Resources Procurement Plan

Response to Question 3 - Adjacent State Criteria:

With regard to the public interest criteria (Section 1-75(c)(1)(I) of the IPA Act) used to determine the eligibility of RECs from projects located in states adjacent to Illinois, The Nature Conservancy believes changes should be made to the current approach for scoring the criteria. Specifically, the current criteria do not consider potential adverse impacts from renewable energy siting related to habitat and wildlife. Poorly sited utility-scale renewable energy projects can expect to face more environmental conflicts.¹ This can lead to project delays, higher costs, and even project abandonment, wasting limited resources and time. Integrating conservation goals into long-term energy planning and procurement is an essential step in reducing risks associated with these projects and accelerating adoption of clean, low-impact renewable energy.

This can be addressed by amending Criterion 5 (Contributing to a cleaner and healthier environment for the citizens of this State) to include siting measures. Criterion 5 is currently measured by taking the average of the first and fourth public interest criteria, which does not directly address siting and land-use impacts related to a cleaner and healthier environment. Criterion 5 should be strengthened by incorporating an approach for measuring renewable energy projects' direct and indirect impacts to habitat and wildlife. This could be achieved through either a tiered approach to siting or environmental impact assessments. We outline the two potential options for strengthening the measurement of the fifth criterion below.

1. Tiered Approach: TNC has worked to develop a quantitative approach to assigning points to new renewable energy development that assigns a higher number of points to projects less likely to have adverse impacts to habitat and wildlife. An example of the rubric is outlined here, though it would need to be modified to fit into the existing public interest criteria.
 - 10 Points - Renewable generation located in the built environment (e.g., rooftops, parking lots).
 - 7 Points - Renewable generation proposed or located in reuse areas (e.g., brownfields, landfills) and/or in areas where renewable generation provides the ecological benefit of covering exposed playa or impaired agricultural land thus "reusing" an area.

¹ Tegan, Suzanne, Eric Lantz, Trieu Mai, Donna Heimiller, Maureen Hand, and Eduardo Ibanez. July 2016. "An Initial Evaluation of Siting Considerations on Current and Future Wind Deployment." National Renewable Energy Laboratory. Technical Report NREL/TP-5000-61750. <https://www.nrel.gov/docs/fy16osti/61750.pdf>

- 5 Points - Renewable generation proposed or located in an area designated for renewable energy or located on previously disturbed lands with low habitat value (e.g., areas cleared for housing development or other infrastructure), and/or lands identified to have low probability of significant adverse impacts² to species of concerns or their habitats.
 - 2 Points - Renewable generation facility proposed or located adjacent to a conservation area (e.g., nature, conservation areas³, important habitat⁴ and connected lands) where development may impact adjoining natural habitat.
 - 0 Points - Renewable generation facility proposed or located in a conservation area, and/or there is a high incidence of state or federal threatened or endangered species (e.g., area that indicates protected land use designation, nature conservation areas, important habitat or areas with a protective designation indicating high ecological values, and connected lands) where development will contribute to the loss of natural habitat, and/or there is a moderate or high probability of significant adverse impacts⁵ to species of concern or their habitats.
2. Assessment by state fish and wildlife agencies: To determine the impact of a renewable energy development, the impacts to wildlife and habitat could be assessed by state resource professionals. A project that is deemed to have no adverse impacts to wildlife or habitat by the Illinois Department of Natural Resources could be awarded more points than a project deemed to have adverse impacts, for example. A rubric could be created to award points based on the projected level of impact.

Thank you for the opportunity to provide comments on this subject.

Sincerely,

The Illinois Nature Conservancy

² As defined in U.S. Fish and Wildlife Service. Land-Based Wind Energy Guidelines. 2012. www.fws.gov/windenergy/docs/weg_final.pdf

³ HCP/NCCP areas, SEAs, BLM Areas of Critical Environmental Concern

⁴ USFWS designated critical habitat for threatened and endangered ESA species

⁵ As defined in U.S. Fish and Wildlife Service. Land-Based Wind Energy Guidelines. 2012. www.fws.gov/windenergy/docs/weg_final.pdf