

## **Adjustable Block Program:**

### **The Nature Conservancy (TNC) in Illinois Response to Request for Stakeholder Feedback**

#### **Community-Driven Community Solar**

The criteria used by the Agency to evaluate community-driven community solar projects should prioritize and incentivize projects that are low conflict for wildlife, habitat, and natural carbon stores, and avoid impacts to important farmland. To that end, we strongly encourage the Agency to include additional criterion 4 (“are not greenfield projects”) as a primary criterion and to allocate a full 2 points to projects meeting this requirement.

Furthermore, we strongly recommend that the Agency expand the definition of this criterion beyond agricultural land. Greenfields include both natural and working lands. We propose the following tiered approach to evaluate this criterion:

**2 Points** - Renewable generation proposed or located in previously disturbed areas (e.g., brownfields; landfills; active, inactive, and abandoned mine lands; state and federally listed Superfund sites) or lands identified to have low probability of significant adverse impacts<sup>1</sup> to species of greatest conservation need or their habitats<sup>2</sup>. Renewable generation located in the built environment (e.g., rooftops, parking lots) should also receive full points.

**1 point** - We encourage the state to consider a subset of agricultural lands that are sensitive or have low productivity, such as highly erodible, drought- or flood-prone lands. Identification of such lands should be undertaken in collaboration with relevant stakeholders, including federal and state agriculture agencies. If these lands are also low value for wildlife, habitat, and have low habitat restoration potential, their use for renewable energy deployment can provide farmers with a new revenue stream and yield “edge of field” water management benefits for communities.

**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 impacts<sup>3</sup> to species of concern or their habitats. This includes Illinois’ Conservation Opportunity Areas<sup>4</sup> (COAs), which are the priority areas the state has identified for conserving Illinois’ species in greatest need of conservation. Prime farmland could also fall in this category.

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<sup>1</sup> As defined in U.S. Fish and Wildlife Service. Land-Based Wind Energy Guidelines. 2012.

[www.fws.gov/windenergy/docs/weg\\_final.pdf](http://www.fws.gov/windenergy/docs/weg_final.pdf)

<sup>2</sup> The Illinois Department of Natural Resources, along with its other state counterparts, has developed a State Wildlife Action Plan that identifies Species in Greatest Conservation Need (SGCN) and their habitat.

<sup>3</sup> As defined in U.S. Fish and Wildlife Service. Land-Based Wind Energy Guidelines. 2012.

[www.fws.gov/windenergy/docs/weg\\_final.pdf](http://www.fws.gov/windenergy/docs/weg_final.pdf)

<sup>4</sup> Illinois’ Conservation Opportunity Areas Map:

<https://www2.illinois.gov/dnr/conservation/IWAP/pages/conservationopportunityareas.aspx>