

VILLAGE PRESIDENT
Carol Gustafson



TRUSTEES
William Babcock
John Broda
Molly Butz
Dayne Mead
Michael Sima
Michael Wright

VILLAGE CLERK
Kimberly Garza

August 13, 2026

TO: President & Village Trustees
FROM: Scot Wrighton, Interim Village Administrator
RE: White Paper on Large Stand-Alone Solar Projects Inside the Village

New legislative policies enacted by the Federal and State governments to financially incentivize the construction and installation of new solar energy projects have pitted the goals of alternative energy against the desire of local governments to reasonably control land use and development inside their jurisdictional boundaries. Recently, the State of Illinois established uniform statewide standards for commercial solar energy facilities. This law prevents local governments from outright banning solar projects, but it allows counties and municipalities to retain zoning authority, provided their local rules are no more restrictive than the state's baseline parameters. The limits of local rules continue to be tested, and will remain the subject of litigation for some time.

Local jurisdictions maintain authority over reasonable property-line setbacks, height limits, and aesthetic vegetative screening requirements. Municipalities often require clear internal access roads and cartways between solar arrays to accommodate local fire and emergency equipment. Sites must abide by local stormwater management codes, avoid building within protected drainage or flood easements, and frequently implement approved perennial or pollinator-friendly ground cover. The policy question of whether or not to allow large solar arrays inside municipal boundaries has been settled; what remains to be settled is under what conditions stand-alone solar projects will be built and operated—including site selections.

The Village of Roscoe adopted a Solar Energy Systems (SES) ordinance in June 2023, and subsequently amended this ordinance in March 2025. These ordinances establish height, setback, visibility, siting, fencing, safety and other restrictions on SES installations; they also stipulate zoning districts where SES can be installed as a basic permitted use, zoning districts where a special use permit is required to install SES, and differentiates between “community solar” and large-scale commercial SES (with detailed rules for each). Although the village’s SES regulations have not been litigated, it is assumed that, in the aggregate, Roscoe’s SES ordinances are fully within the bounds of the remaining authority given to Illinois local governments to regulate and control SES. What the village’s ordinances do **not** specifically address is whether an actual SES project constitutes a development that, when complete, is the “highest and best use” (HBU) of land, and in that context whether it advances the village’s comprehensive plans for Roscoe, and how the governing body wants to see the municipality developed and improved in future years. Applying these “higher level” land use and community development considerations involves assessing long-term economic return, achieving community goals, and assuring that there are real estate options to develop the public

and private services the community wants and needs in the future. These “other” considerations are not always compatible with landowners’ immediate expectations for income generation from their real estate. While solar provides higher financial yields and predictable income for landowners (generally higher and more consistent/reliable than agricultural income), it is not universally the highest and best use when compared to other types of commercial real estate development, housing, or even high-value agriculture. Most solar land leases are for at least 20 years, and for cities and villages this can disrupt their commercial and residential development plans.

For the most part, the Village of Roscoe’s SES ordinances and special use permit requirements provide an adequate process to make sure an SES project does not allow toxic chemical leaching, or solar panel glare disrupting nearby traffic and residents, or lithium fire hazards from battery storage systems connected to SES, other environmental hazards, or even result in significant property value decreases as a result of SES installations immediately adjacent to residential neighborhoods. In other words, the village’s SES ordinances adequately carve out as much local control as possible and spell out a uniform process for review and evaluation of SES applications to **reduce or eliminate direct harms** from a proposed SES.

So, the remaining policy question for the Village Board to consider before evaluating specific SES project applications is: does the Village Board want to inject highest & best use, and other higher-level community development goals, into its review of SES special use permits that may be submitted by developers in the future? If so, what criteria should be used to add this element into the review process, and how can the village disseminate this information to prospective solar developers in a uniform and consistent manner, so they know what to expect when approaching the village? Alternatively, the Village Board can elect to **not** consider these less tangible issues. However, the underlying rationale for requiring special use permits in the first place, is to allow local government leaders to evaluate a special or customized development application in the full context of what is best for the entire community, what assures an orderly and successful future for the locality, and other local aspirational goals.