USDA October 2026 REAP Rules Comment Points

General

- REAP was created in the 2002 and 2008 Farm Bills to help farmers and rural small business owners implement energy efficiency and renewable energy projects to lower energy bills, support contractors, and keep energy dollars in the community
- Through kneecapping solar and converting the program from up-front grants into after-the-fact risky rebates, the program both abandons the single most prosperity-creating practice, and establishes a wasteful corporate subsidy program
- USDA should return to the prior rules and wait for Congress to finish the Farm Bill

Solar on Cropland

- Disallowing solar on certified cropland discriminates against crop producers wanting to establish solar, relative to town-based small business owners
- The vast majority of REAP solar projects utilize less than an acre of cropland
- USDA should remove the solar acreage limitation entirely; alternatively, follow the US House Farm Bill approach that created a 5 acre solar cropland maximum for financial assistance (50 acres with local government approval and a conservation plan)

Solar and Imported Comments

- The ban on all solar components from adversary countries will drive up the cost of systems, and create burdensome red tape and bureaucratic delays within USDA, which does not have the expertise to evaluate solar supply chains
- The ban is entirely unnecessary, as the IRS/Treasury has already created rules on solar components from “adversary” countries per the OBBBA and Executive Order 14315 via the section 48E tax credits
- USDA should simply remove all reference to solar components; alternatively, simply require REAP applicants to meet Treasury 48E tax credit rules

Change from Grant to Rebate Program

- The change from a grant to a non-guaranteed rebate program will discriminate against small farms and businesses and favor of subsidy for big business and corporations
- It will also morph into a tremendously wasteful free ridership program, because only those entities with enough financial resources to do projects regardless of funding will do so, and then will acquire “free money” after the fact
- The change from a grant incentive to a rebate program is likely illegal per statute
- The program rules should be restored to the original grant program rules

Technical Assistance Improvements and Other Issues

- The Energy Auditing and Renewable Energy Development Assistance programs should be combined, as most potential applicants are interested in learning about both EE/RE
- All nonprofits should be eligible to apply, as long as they demonstrate TA capacity
- Funding should allow for at least 2 year, $250K grants versus the current 1 year/$100K