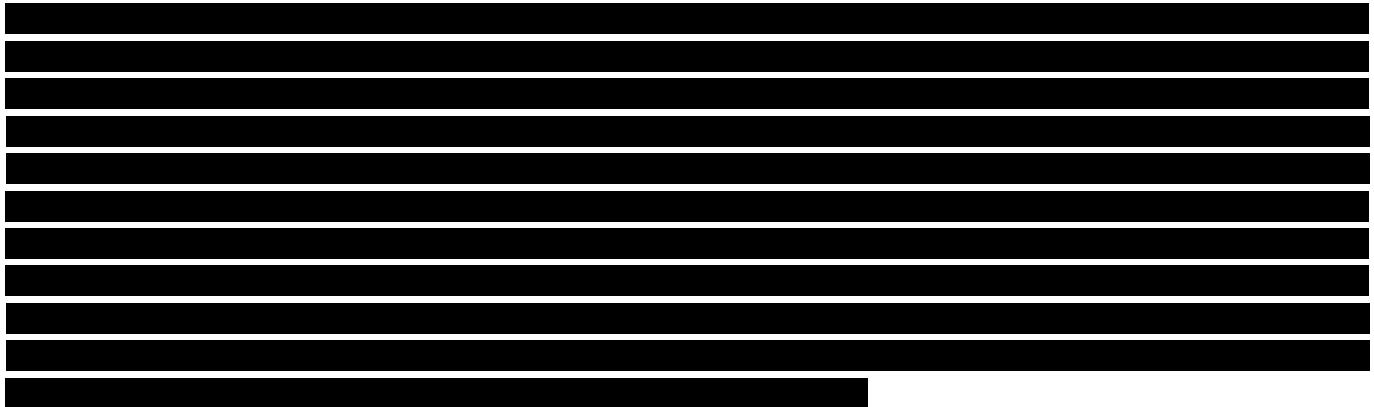


R05-24-A-007



## NARRATIVE INFORMATION SHEET



1. Applicant Identification: **City of Rockford, Illinois, 425 E. State Street, Rockford, IL 61104**
2. Funding Requested:
  - a. Assessment Grant Type: **Community-Wide**
  - b. Federal Funds Requested: **\$500,000**
3. Location: **City of Rockford, Illinois (Winnebago County)**
4. Target Area and Priority Site Information:
  - **Keith Creek Floodway Area:** Census Tracts 17-201001400; 17-201001300; 17-201001200; 17-201001000. Priority Sites include:
    - Former Highland Lumber & Fuel Co. Lumber Yard – 2233 Charles Street, Rockford, IL 61104
    - Former Highland Lumber & Fuel Co. Bulk Petroleum Plant – 2222 7<sup>th</sup> Avenue, Rockford, IL 61104
    - Former Custom Gear & Machine Parcel – 1718 7<sup>th</sup> Avenue, Rockford, IL 61104
  - **South Main Street Corridor:** Census Tracts 17-201002200; 17-201002700; 17-201002800. Priority Sites Include:
    - Barber Colman North Area – 900 – 1100 blocks of S. Main Street, Rockford, IL 61101
    - South Main Railyards – 615 S. Main St., Rockford, IL 61101
5. Contacts:
  - a. Project Director: **Robert Wilhelmi | 779.348.7425 | [Robert.wilhelmi@rockfordil.gov](mailto:Robert.wilhelmi@rockfordil.gov)  
425 E. State Street, Rockford, IL, 61104**
  - b. Chief Executive/Highest Ranking Elected Official: **Mayor Thomas P. McNamara | 779.348.7333  
[Thomas.McNamara@rockfordil.gov](mailto:Thomas.McNamara@rockfordil.gov)  
425 E. State Street, Rockford, IL 61104**



6. Population: **City of Rockford – Population of 146,713 (US Census Bureau, 2022 Vintage Year Estimate)**

7. Other Factors:

Other Factors	Page #
Community population is 10,000 or less.	NA
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	NA
The priority site(s) is impacted by mine-scarred land.	NA
The priority site(s) is adjacent to a body of water (i.e., the border of the priority site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thorough-fare separating them). <b>*Both Target Areas immediately adjacent to Rock River and/or Keith Creek</b>	<b>1,2,3,4</b>
The priority site(s) is in a federally designated flood plain. <b>*Note All Priority Sites in Target Area 1 and Priority Site 2 of Target Area 2 are within Federally designated floodway or floodplain.</b>	<b>1,2</b>
The reuse of the priority site(s) will facility renewable energy from wind, solar, or geothermal energy. <b>New solar and LED lighting technologies totaling \$1 million were installed in Target Area 2 using City CIP funds as part of the S. Main Corridor reconstruction project.</b>	<b>4</b>
The reuse of the priority site(s) will incorporate energy efficiency measures.	NA
The reuse strategy or project reuse of the priority site(s) considers climate adaptation and/or mitigation measures. <b>Redevelopment of Sites 1 and 2 in the Keith Creek Greenway (Target Area 1) are identified as key catalytic sites for effective flood mitigation.</b>	<b>1</b>
At least 30% of the overall project budget will be spent on eligible reuse/area-wide planning activities, as described in Section I.B., for priority site(s) within the target area(s)	NA
The target area(s) is located within a community in which a coal-fired power plant has recently closed (2012 or later) or is closing.	NA

8. Letter from the State or Tribal Environmental Authority: **Please refer to attached letter from the Illinois Environmental Protection Agency acknowledging the City of Rockford’s efforts to obtain United States Environmental Protection Agency Brownfields Assessment Grant funds.**

9. Releasing Copies of Applications: **Not applicable. Application does not include confidential, privileged, or sensitive information.**

If you should have questions, please do not hesitate to contact my office.

Sincerely,

Thomas P. McNamara  
Mayor, City of Rockford

**Attachments** – Letter from State Environmental Authority (Illinois EPA)



**Subject: State Acknowledgement Letter for the City of Rockford  
FY2024 US EPA Brownfield Assessment Grant Application**

10/18/2023

City of Rockford  
ATTN: Mayor Thomas McNamara  
425 E. State Street  
Rockford, IL 61104

Dear Mayor McNamara,

The Illinois Environmental Protection Agency (Illinois EPA) has received your request for a letter of acknowledgement for an upcoming Assessment Grant application to U.S. EPA. City of Rockford is applying for a \$500,000 Assessment Grant.

The grant will be a Assessment Grant for Hazardous Substances and Petroleum.

Illinois EPA acknowledges City of Rockford's efforts to obtain federal Brownfields funds for this project. If you have any questions, I may be contacted at the above address or telephone numbers below, or at [Jacob.fink@illinois.gov](mailto:Jacob.fink@illinois.gov).

Sincerely,

Jacob Fink  
Brownfield Program Administrator  
Bureau of Land/Office of Site Evaluation  
Office# (217) 785-8726  
Cell# (217) 986-0818  
[Jacob.fink@illinois.gov](mailto:Jacob.fink@illinois.gov)





*Thomas P. McNamara  
Mayor  
Office of the Mayor*

## **THRESHOLD CRITERIA RESPONSES**

### **1. Applicant Eligibility**

- a. We affirm the City of Rockford, in the County of Winnebago, as a municipal corporation in the State of Illinois as set forth by the Charter of the City of Rockford, approved February 15, 1865, and enrolled as law on March 10, 1865
- b. Not Applicable – The City of Rockford is not organized for profit and is not operated exclusively to promote social welfare per Internal Revenue Code section 501(c)(4).

2. Community Involvement: Rockford utilizes a diverse communications platform to inform residents and stakeholders of its brownfields projects and grant activities. A Brownfields Revitalization webpage is maintained that details all activities related to the City's efforts, including accomplishments, active projects, and community engagement and feedback opportunities. Project updates are also posted to the City's social media pages, which has become a key communication tool. We recognize that social media is often ineffective for communicating with older, marginalized, and disconnected residents and have found that in-person updates made at the monthly meetings of the City's 10 active neighborhood groups and Alderman Ward Meetings can fill this gap. The City's Neighborhood Specialist position is utilized as a "boots on the ground" approach for engaging disconnected residents. The goal of this position is to build and nurture trust and relationships with Rockford residents through a trauma-informed, diversity/equity/inclusion-focused approach with direct and repeated outreach.

3. Expenditure of Existing Grant Funds: The City of Rockford currently has no active US EPA Brownfields Assessment or Multipurpose Grants.

4. Contractors and Named Subrecipients: N/A – No Contractors have been procured. No subrecipients have been chosen to conduct work proposed in this application.

**City of Rockford, Illinois**  
**United States Environmental Protection Agency Brownfields Assessment Grant Application**

**1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION**

**1.a. Target Area and Brownfields**

1.a.i. Overview of Brownfield Challenges and Description of Target Area: The City of Rockford, Illinois, a city of 146,713,<sup>1</sup> was settled in 1834. Bisecting Rockford is the Rock River, which quickly became the City's most valuable resource that allowed for rapid industrial development along its banks. By harnessing its hydraulic power, factories were quickly built along the river that started Rockford's economic growth. By the 20<sup>th</sup> century, Rockford became an industrial hub for the manufacturing of furniture, tools and dies, heavy machinery, and hardware, even gaining a reputation as the Screw Capital of the World due to the vast number of fastener and hardware manufactures. For most of the 20<sup>th</sup> century, Rockford was a thriving manufacturing community with over 40% of its workforce employed in the sector as late as the 1970s.<sup>2</sup> With manufacturing as its economic backbone, the recession of the 1980s landed a crippling blow. Rockford has since faced decades of economic decline, with the loss of manufacturing jobs being replaced by lower paying service industry jobs. Currently, 16.7% of Rockford's workforce is employed in manufacturing, a number that continues to decline.<sup>3</sup> The declining manufacturing sector has produced a vast number of brownfields that have led to complex Environmental Justice issues, with a high concentration along our most valuable resource, the Rock River. A brownfields inventory actively maintained by the City has identified 887 sites. Based on the widespread distribution of sites throughout Rockford, our application is **Community-wide** with priority focus on the following target areas. A new assessment grant in the amount of \$500,000 is being requested to perform environmental assessments and cleanup planning on these priority sites, which is the critical first step in positioning brownfield sites for cleanup and redevelopment.

**Target Area 1 – Keith Creek Greenway:** Keith Creek flows southwest through Rockford, ultimately flowing into the Rock River at the western limits of Target Area 1. Upstream, the creek travels through historically rural areas. Upon entering the Target Area, the creek becomes heavily channelized and the surrounding land uses transition to densely urbanized neighborhoods and faded industry. The final 2.4-mile stretch flows through some of Rockford's most historically disadvantaged neighborhoods.<sup>4</sup> The Keith Creek Greenway faces several challenges, including severe and persistent flooding, poor water quality, mobility and transportation barriers, commercial vacancies, and lack of community access to the creek for recreation.<sup>4</sup> Some of Rockford's earliest industries were established along the creek and served by railroad. Persistent flooding fated industry to fail along the creek and left behind several brownfields. After back to back 100-year flood events in 2006 and 2007, the City began the buyout and demolition of over 130 flood damaged homes and businesses in the Creek flood plain for a planned engineering project to reduce flooding, improve greenspace and resident connectivity, restore social equity, and return Keith Creek's natural features. Before improving drainage and creating recreational access to the creek, environmental assessments are needed to screen for environmental hazards. The Keith Creek Greenway includes Census Tracts 17-201001000, 17-201001200, 17-201001300, and 17-201001400.

**Target Area 2 – South Main Street Corridor:** Main Street follows the Rock River through Rockford and was once a thriving center for businesses and industry. Business along the highway prospered, as it was once a primary transportation route between Illinois and Wisconsin. This changed in the late 1950s, with the completion of Interstate 90 and the Highway 20 bypass that routed highway traffic around the City and away from its urban core. Significantly reduced traffic paired with a declining industrial sector led to a blighted corridor that currently serves as the primary southern entry point to a rising downtown district. The S. Main Street Corridor is comprised of Census Tracts 17-201002200, 17-201002700, and 17-201002800 and abuts the Rock River south of downtown. West of S. Main Street is a large residential area negatively impacted by corridor blight and vacancies as a result of historic redlining, increased dilapidated housing, and lack of economic opportunities.<sup>5</sup> Stressed social, environmental, and economic conditions are also present as a direct result of the large number of brownfields in close proximity.<sup>6</sup>

1.a.ii. Description of the Priority Brownfield Site(s): The **Keith Creek Greenway** has 3 priority sites. **Sites 1 and 2** are separate parcels bisected by Keith Creek, formerly occupied by the Highland Lumber & Fuel Company from the 1920s to the 1970s. North of the creek is **Site 1**, addressed as 2233 Charles Street and currently containing a blighted and vacant shopping plaza. **Site 1** is 1.7 acres and once operated as the lumber mill portion of the business along with a gas station. Contaminants of concern include arsenic, copper, and chromium from the treatment and milling of lumber, polynuclear aromatic hydrocarbons (PNAs), and petroleum from the former gas station. **Site 2** is located south of the creek at 2222 7<sup>th</sup> Avenue and once operated as the bulk petroleum portion of the business. Various grades of heating oils were unloaded from rail tankers into a network of 5,000 to 10,000 gallon aboveground tanks, before being pumped into tanker trucks for home delivery. The 1.8-acre parcel is vacant and contains a partially collapsed oil warehouse. Contaminants of concern include petroleum related Volatile Organic Compounds (VOCs) and PNAs. **Sites 1 and 2** are identified as key catalytic sites for effective flood

**City of Rockford, Illinois**  
**United States Environmental Protection Agency Brownfields Assessment Grant Application**

mitigation and generating holistic community benefit by a 2022 Keith Creek Corridor Study. **Site 3** is the former Custom Gear & Machine parcel at 1718 7th Ave. The 1-acre parcel abuts Keith Creek and contained several machine shops that operated from circa 1913 until the City's purchase and demolition in 2008. A 2008 Phase I ESA identified several Recognized Environmental Conditions (RECs), including former Underground Storage Tanks (USTs), industrial machining, and the railroad. The report details the presence of petroleum contamination encountered during abandonment of a former UST in 1993. Contaminants of concern for the property are VOCs, PNAs, heavy metals, and polychlorinated biphenyls (PCBs). The assessment and cleanup of these sites will positively impact the Greenway by promoting new investment, enhancing mobility, reducing flood events, and restoring public access to the creek.

The **S. Main Street Corridor** is inundated with brownfields, most notably the 10-acre cluster of parcels known as the Barber Colman North Area (**Site 1**) and the 23-acre S. Main Rail Yards (**Site 2**). Shaped like a triangle and bound by S. Main Street to the west, Rock Street to the south, and the Canadian National Rail Road to the northeast, **Site 1** contains of a mixture of blighted and underutilized commercial and industrial buildings that once housed a variety of businesses known for negatively impacting the environment. Past and current uses include a commercial dry cleaner, foundry, automotive repair, and gas stations. Redevelopment focus has recently shifted to the Barber Colman North region as the next high priority development area due to its location being immediately north of the recently commenced \$430 million Colman Yards brownfields redevelopment project. Colman Yards utilized \$2.24 million in US EPA Assessment, Cleanup, and RLF grant monies that gave rise to the privately funded mixed-use redevelopment project in the heart of the **S. Main Street Corridor** that includes the adaptive reuse of 9 historic buildings across 25 acres. **Site 1** is inventoried but no assessment work has been completed. Phase I and II ESAs are needed to determine if cleanup is necessary before redevelopment. The S. Main Rail Yards (**Site 2**) is located immediately northwest of **Site 1** and fronts the 600 block of S. Main Street. Bound by Kent Creek to the west, with most of **Site 2** being flood plain. The Union Pacific Railroad spans the north perimeter. Established in the 1870s, a network of railroads and industry once operated on **Site 2**. The northern parcels of **Site 2** are owned by the City and were assembled in the 1990s. The City is actively pursuing acquisition of the southern portion that is owned by the Canadian Pacific Railroad. **Site 2** abuts 4.75 acres of City-owned brownfields to the south that are in the final stages of cleanup before receiving a No Further Remediation (NFR) Letter from the State's voluntary cleanup program. In July 2023, the State of Illinois formally announced the 2027 return of Metra passenger rail from Rockford to Chicago on the north adjacent Union Pacific line, positioning **Site 2** as the most viable location for a planned train station and multi-modal facility. It is critical that Phase I and II ESAs be completed on **Site 2** to evaluate for contaminants of concern (VOCs, PNAs, PCBs, heavy metals) and perform the necessary cleanup planning prior to site design and construction. The locations of **Sites 1 and 2** are a direct and critical link between the Colman Yards project, Chicago/Rockford passenger rail, and a growing downtown district, ultimately supporting economic growth and the restoration of absent services.

**1.a.iii. Identifying Additional Sites:** Our Community-wide grant application approach gives flexibility to assess additional sites. If grant funds remain after assessing the priority sites or if new sites transition to high priority due to development interest, the following steps will be taken, which are consistent with current City practice and the selection criteria outlined in the grant work plan: (1) Review the City's Brownfields Inventory for other sites in Target Areas or beyond that are identified as disadvantaged per the US Climate and Economic Justice Screening Tool and US EPA's EJScreen. (2) Review Comprehensive Plan for consistent redevelopment uses of sites. (3) Conduct community engagement and consult with community partners to evaluate potential environmental and social health impacts from additional sites. (4) Identify potential post cleanup uses that fill critical service gaps for nearby residents.

**1.b. Revitalization of the Target Area**

**1.b.i. Reuse Strategy and Alignment with Revitalization Plans:** Project goals for redevelopment of the **Keith Creek Greenway (Target Area 1)** include increasing area resiliency, mitigating flooding, improving equitable access to alternative transportation, highlighting a unique natural resource, supporting economic development, and improving social equity in the surrounding neighborhoods. In October 2023, City Council formally adopted the City of Rockford's 2040 Comprehensive Plan, which established the framework of an ideal future for the region and sets the guiding principles to navigate new challenges and complex choices. The plan identifies greenways as key areas that connect open space to other lands, acting as arteries that connect vital organs together into one cohesive unit.<sup>7</sup> Greenways are part of a network of green infrastructure, linking together parks, preserves, wetlands, unique habitats, and other environmentally sensitive areas. Greenways are not only planned and managed for their natural resource value but also for the associated benefits and services they provide to communities, including the promotion of active transportation and the resulting health benefits. Additionally, the Keith Creek Corridor Study was released in November 2022, which creates a vision for the **Keith Creek Greenway**

## City of Rockford, Illinois

### United States Environmental Protection Agency Brownfields Assessment Grant Application

through a comprehensive creek corridor analysis, including socio-demographic metrics, access to transportation, and the assessment of environmental conditions. The study provides a green infrastructure network that provides a special framework for climate adaptation planning, all of which aligns with the land conservation efforts of our 2040 Comprehensive Plan. The Study establishes a feasible plan for development scenarios, a phased development timeline, and funding options to seek out project goals. Assessing and cleaning up the brownfields is the next phase of the project that must occur as the City assembles funding for the construction phase.

In 2010, Rockford moved forward with initiating a planning process to develop a revitalization and implementation strategy for the **S. Main Street Corridor (Target Area 2)** to build upon the forthcoming roadway and infrastructure reconstruction of S. Main Street. The South Main Revitalization Strategy was the first comprehensive approach to revitalization of an important gateway into the heart of Rockford's growing downtown district. A 3-phase approach was initiated that included an evaluation of current corridor conditions, development of a community vision, and a detailed revitalization strategy moving forward. From 2014 to 2017, a joint investment between Rockford and the Illinois Department of Transportation (DOT) resulted in just over 2 miles of new roadway, water main, sanitary sewer, and storm sewer utilities. A corridor recreation path with greenspace was also created to improve mobility, recreation, and connection to the Rock River. The \$28 million project was completed to support existing businesses and attract new development to the area. Incorporating the environmental cleanup and reuse of brownfield sites was identified as a primary goal in the Revitalization Strategy to improve overall environmental health, with the 3 priority sites identified as catalytic sites that are instrumental in bridging the physical gap from downtown to Southwest Rockford. The Strategy was adopted in 2011 and incorporated as an amendment to the 2020 Comprehensive Plan. The US EPA Office of Brownfields and Land Revitalization's Southwest Rockford Neighborhood Brownfields Revitalization Framework identifies the Barber Colman area containing **Site 1** as the key catalytic area for the community to focus on and create a vision of reuse around.<sup>5</sup> Additionally, the Framework Plan calls out the northwest corner of the study area, containing the S. Main Rail Yards (**Site 2**) as likely to benefit from recent development in Downtown Rockford, including the \$85 million Embassy Suites Riverfront Hotel and Conference Center, a former priority brownfields site that was assessed and cleaned up by the City and a private developer. Upon request, a US EPA Rapid Health Impact Assessment (HIA) was completed to help guide the surrounding residential areas impacted by brownfields in the Corridor. These revitalization strategies and framework plans, along with the 2040 Comprehensive Plan, will continue to guide redevelopment efforts in the Corridor. Additional assessment grant funds are vital to completing Phase I and II ESAs of the priority site and other brownfields in the Corridor to continue redevelopment momentum.

**1.b.ii. Outcomes and Benefits of Reuse Strategy:** By following the established framework strategies, the following outcomes are anticipated for the **Keith Creek Greenway**: (1) Creation of equal access for all community members, regardless of race, income, age, and ability to have equal access to a safe, healthy, and vibrant living environment; (2) Improvement of transportation access throughout the Corridor will be improved by creating safe connections to key commercial nodes, neighborhoods, recreation and cultural amenities; (3) Creation of an identity for the area while offering meaningful, engaging experiences; (4) Development of projects within the watershed that increase interaction with the creek, the resilience of the Corridor, and economic growth; (5) The improvement of infrastructure and utilities to align with the concepts and visions set forth in the Comprehensive Plan; (6) Mitigation of flooding by following storm water best management practices; (7) Improved water quality and habitats within the watershed by reducing runoff and protecting environmentally sensitive areas.

The following outcomes and benefits are anticipated as a result of the reuse strategies and infrastructure investment in the **S. Main Street Corridor**. (1) Attraction of a range of sustainable land uses and development patterns consistent with community character, existing infrastructure capacities, and City initiatives in order to achieve a critical mass of market activity that will support existing and future businesses and mixed-use redevelopment; (2) Development of the Corridor to accommodate all types of transportation including motorists, bicyclists, pedestrians, and users of public transit in a safe and efficient manner to local and regional destinations; (3) Creation of a vibrant and economically sustainable Corridor that serves the needs of residents, business owners, employees and visitors; (4) Creation of a neighborhood "Center" for social gatherings, programs, and recreation opportunities; (5) Establishment of a direct connection to the Rock River through increased public access, while preserving and enhancing sensitive areas; and (6) Improvement in the environmental health of residents negatively impacted by past industrial decline and brownfields by supporting Environmental Justice efforts.

#### **1.c. Strategy for Leveraging Resources**

**1.c.i. Resources Needed for Site Reuse:** Additional Assessment Grant funds are the critical resource needed to commence the initial phase of the **Keith Creek Greenway**. To date, Rockford has leveraged

## City of Rockford, Illinois

### United States Environmental Protection Agency Brownfields Assessment Grant Application

over \$11.6 million in Federal Emergency Management Agency Hazard Mitigation Grant funds and Illinois Department of Commerce and Economic Opportunity funds for the acquisition and demolition of over 130 flood impacted properties. Rockford then worked with community partner Region 1 Planning Council (R1PC) for a \$281,000 Illinois DOT Planning and Research grant to complete the Keith Creek Corridor Study. Additionally, Rockford was awarded a \$1.2 million Flood Mitigation Grant from the Illinois Department of Natural Resources for the acquisition and demolition of flood plain properties. However, prior to acquisition, the City must perform Phase I and II ESAs. **Priority Site 3** is owned by the City but still requires a Phase II ESA to identify contamination. If cleanup is required, US EPA Cleanup Grants will be applied for, or the City may elect to work with a third-party partner to leverage its existing US EPA Revolving Loan Funds. Once the environmental assessments are complete, construction of our community's vision for the Greenway can move forward. In 2020, Rockford began programming \$1 million annually in CIP funds to help fund construction costs and is actively seeking additional leveraged funding from State, Federal, and local sources.

A \$28 million infrastructure upgrade was the first major investment in the **S. Main Street Corridor**. Sanitary sewer upgrades were provided by Four Rivers Sanitation Authority (\$60,000). New solar and LED lighting technologies totaling \$1 million were installed using City CIP funds. In some areas, sections of water main were nearly 100 years old and were replaced, along with dangerous lead service lines feeding homes and businesses, using \$3.7 million of the City's Water Replacement and Improvement Account. City CIP, Illinois DOT, and Federal National Highway Performance Program funds were combined for the \$23.2 million rebuild of roadway and adjacent recreation path. The investment in new infrastructure was a major component in attracting a developer for the Colman Yards redevelopment, a former priority site where over \$9.5 million of additional investment in the assessment and cleanup of the 26-acre campus has been made using US EPA Assessment Grants, Cleanup Grants, RLF, and various local funds. The project has catalyzed an uptick in development interest in the Corridor, much of it still needing grant funded Phase I and II ESAs. If the assessments identify contamination requiring cleanup, the City will apply for US EPA Cleanup Grants or supplemental RLFs as part of an existing RLF program. Another resource is Rockford's Enterprise Zone, which was amended in 2023 to include areas of S. Main Street. State Legislation allows for the creation of Enterprise Zones to assist in the revitalization of distressed areas by offering financial and tax incentives to stimulate business growth and neighborhood improvement. A few of these incentives include a State income tax credit, sales tax exemption on building materials, a 5% utility tax exemption, and a 4-year City property tax abatement. Another resource, Rockford's River Edge Redevelopment Zone (RERZ), is by far the most attractive incentive that can be leveraged. In an effort to combat brownfields along the Rock River, the City worked with the State of Illinois to commence the program in 2007. The goal of the RERZ program is to create and retain jobs and stimulate business and industrial retention and growth. An emphasis on returning environmentally challenged sites to productive use sets it apart from other programs. In addition to building material sales tax exemption and property tax abatement incentives, the program offers a State Historic Preservation Credit equal to 25% of a project's qualified rehabilitation expenditures for certified historic structures. When the State historic tax credit is combined with a 20% Federal historic tax credit, **developers can seek tax credits totaling 45% of a project's eligible costs!** Both the S. Main Street Corridor and parts of the Keith Creek Greenway are located in the RERZ.

**1.c.ii. Use of Existing Infrastructure:** A primary goal in the 2040 Comprehensive Plan is to promote targeted infill development. We recognize that the Keith Creek Greenway, S. Main Street Corridor, and other priority brownfield sites are located in our urban core along the Rock River. Infill development here would put less strain on existing facilities, infrastructure, and services. The infrastructure investment in the S. Main Corridor has already begun to attract investment to area brownfields, as demonstrated by the recently completed Embassy Suites Riverfront Hotel project and recently commenced Colman Yards project that will adaptively convert 10 historic structures to a mixed-use live/work/play urban community. As early as 1937, Residential Security Maps (redlining maps), identified the Keith Creek neighborhoods as "Grade D", indicating a lack of investment in the area due to flooding.<sup>4</sup> As we seek out the goals of the Keith Creek Corridor Study, we will see a reduction in flooding and improvements to transportation and the built environment in the neighborhoods connected to the Greenway. This will encourage reinvestment in an existing housing stock and commercial buildings that already utilize existing infrastructure that will continue to upgrade. In October 2023, a City-funded \$5.5 million rebuild of Charles Street was completed, one of the primary arterial roads for servicing the Keith Creek Greenway. Identified as one of the poorest conditioned arterial streets in the City, improvements included complete reconstruction of the roadway, construction of an adjacent multiuse path and sidewalks, new traffic signals, sanitary sewer improvements, and new storm sewer for flood control.

## 2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT



**City of Rockford, Illinois**  
**United States Environmental Protection Agency Brownfields Assessment Grant Application**

**2.a. Community Need**

**2.a.i. The Community's Need for Funding:** As recent as 2002, Rockford was the second largest City in Illinois. Now fifth, Rockford continues to experience distress as a result of four closely related problems that prevent our ability to draw funding from typical sources: (1) A shrinking population: Between the 2010 and 2020 Census, Rockford population experienced a 5% reduction.<sup>8</sup> (2) An enormous, growing pension burden that is crowding out core government services: Since 2013, pension costs have tripled from \$9 million to \$27 million, which has created chaos on City finances. Despite restructuring modern pensions, older pensions continue to strain the City's general fund. (3) An already-heavy property tax burden that limits the City's ability to raise revenue without driving out more residents and businesses. A 2.6% property tax rate more than doubles the national average of 1.1%.<sup>9</sup> (4) High poverty and low household income: Rockford's 22% poverty rates nearly doubles State 11.9% and National (11.5%) levels while median household income is 35% below State and 32% below National rates.<sup>1</sup> As we continue to navigate these challenges, US EPA Brownfields Grants continue to be the vital funding mechanisms for City-wide brownfields revitalization efforts. **Rockford's most recent FY2019 US EPA Brownfields Assessment Grant is 100% exhausted with no additional assessment funding mechanisms.**

**2.a.ii. Threats to Sensitive Populations:**

**(1) Health or Welfare of Sensitive Populations:** Brownfield sites are negatively impacting the welfare of sensitive populations in the Target Areas. According to US EPA's EJScreen Viewing Tool, both Target Areas are characterized by significantly elevated occurrences of unemployment and low income. For the **Keith Creek Greenway**, the poverty and unemployment rates in all 4 census tracts more than double state and national averages, with values tripling in some tracts. Additionally, all census tracts show high minority values when compared to state and national averages. An elevated demographic index is present in all census tracts in Keith Creek, more than doubling State and National averages. Additional elevated socioeconomic indicators for Keith Creek include Less than High School Education, Limited English Speaking Households, and sensitive populations Under the Age of 5. The **S. Main Street Corridor** is experiencing very similar socioeconomic issues, with most values either doubling or tripling state and national averages and a minority population approaching 90%. The table below is a summary of the data values obtained from Target Area census tracts as acquired from the US EPA's EJScreen Viewer.

Target Area	Census Tract(s)	Indicator	Value	IL Avg.	US Avg.
Keith Creek	17201001000   1200	Unemployment	22%   16%	7%	6%
S. Main St.	17201002800   2700		17%   16%		
Keith Creek	17201001000   1200	Low Income	77%   79%	29%	31%
S. Main St.	17201002800   2200		65%   60%		
Keith Creek	17201001000   1200	People of Color	68%   75%	39%	39%
S. Main St.	17201002800   2700		85%   86%		
Keith Creek	17201001000   1200	Demographic Index	73%   77%	34%	35%
S. Main St.	17201002800   2700		75%   71%		
Keith Creek	17201001200   1300	Less than HS Education	24%   21%	11%	12%
S. Main St.	17201002800   2700		49%   36%		
Keith Creek	17201001000   1200	Limited English Speaking	9%   8%	4%	5%
S. Main St.	17201002800   2200		18%   17%		
Keith Creek	17201001000   1300	Under Age 5	16%   11%	6%	6%

In addition to the EJScreen data, the findings of US EPA's Southwest Rockford Revitalization Rapid HIA identified single parent households with children under the age of 18 as an additional sensitive population in the S. Main Street Corridor, with a value of 32.2 ± 8.8. This significantly exceeds values when compared to Rockford as a whole (14.5 + 0.9) and Illinois (8.6 + 0.1).<sup>6</sup> Additionally, the HIA found that approximately 60% - 68% of the minority population in the corridor is Latino.

**(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions:** According to data from the Center for Disease Control (CDC), the average life expectancy at the **S. Main Corridor** is 74.4 years, which is nearly 5 years below the State average of 79.3 years.<sup>10</sup> The **Keith Creek Greenway** shows an even lower value of 73.5 years.<sup>10</sup> According to EPA's EJScreen, Asthma, Heart Disease, and Persons with Disabilities are also prevalent in the S. Main Street Corridor, with some tracts showing occurrences in the 91 – 97 percentile above State and National values.

Target Area	Census Tract(s)	Indicator	Health Value	IL %	US %
Keith Creek	17201001000   1200	Heart Disease	8.2   7.1	94%   78%	86%   71%
S. Main St.	17201002200   2800		7.9   7.1	91%   78%	83%   71%
Keith Creek	17201001000   1200	Asthma	13.6   12.4	97%   93%	97%   93%
S. Main St.	17201002700   2800		12.4   11.9	93%   90%	97%   93%

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Keith Creek	17201001300	1200	Pers. with Disabilities	25.6	22.8	97%	95%	95%	92%
S. Main St.	17201002200	2700		16.2%	15.5%	78%	76%	71%	68%

Additionally, the US EPA Southwest Rockford Revitalization Rapid HIA identified several concerning adverse health issues well above local and national averages that are indicators of poor environmental health and economic opportunities in the S. Main Corridor, as presented in the following table.

Census Tract(s)	Health Outcomes	Cen. Tracts*	Rockford*	U.S.*
17201002700 2800	Chronic Diabetes, Adults > 18	16.2% 19.8%	12.2%	10.8%
17201002700 2800	Mental Health Not Good, Adults > 18	17.6% 21.3%	15%	12.4%
17201002700 2800	Physical Health Not Good, Adults > 18	17.9% 23%	15.2%	12.3%
17201002700 2800	Obesity Among Adults > 18	43% 48.4%	35.2%	30.1%
17201002700 2800	Lack of Health Insurance, Ages 18-64	28.3% 35.3%	16.6%	14.7%

\*Data from 2017 Behavioral Risk Factor Surveillance System (BRFSS) reported

EJScreen shows several cumulative environmental issues present in the target areas' census tracts that jeopardize human health and environment. An alarming number of these environmental issues well exceed State and National Averages as presented in the table below, with bold values reaching into the 90 - 97 percentile. These cumulative issues combined, with the vast number of target area brownfields, place an undue burden from existing sources of pollution on human health and environment. Contaminated soil and groundwater present at the priority sites may pose a serious health threat to nearby residents and sensitive populations because of contaminant migration. Contamination may also be negatively impacting the already threatened ecosystems of Keith Creek and the Rock River. A new Assessment Grant is crucial to identify and assess brownfields for contamination, ultimately positioning sites for cleanup to eliminate associated adverse health effects.

Target Area	Census Tract(s)	Env. Issue	Values	IL %	US %
Keith Creek	17201001300   17201001400	Lead Paint	0.86   0.83	91%   89%	94%   93%
S. Main St.	17201002700   17201002800		0.84   0.73	90%   79%	94%   87%
Keith Creek	17201001000   17201001200	Superfund Proximity	0.89   0.82	98%	97%
S. Main St.	17201002800   17201002200		0.79   0.73	98%	97%
Keith Creek	17201001000   17201001200	Haz. Waste Proximity	6.4   6.4	95%	92%
S. Main St.	17201002800   17201002200		3.8   3.2	87%   84%	85%   82%
Keith Creek	17201001200   17201001400	RMP Proximity	1.4   1.2	84%   82%	92%   91%
S. Main St.	17201002200   17201002700		1.3   0.76	83%   72%	91%   84%

(3) *Environmental Justice*: According to the Climate and Economic Justice Screening Tool (CEJST), all census tracts making up the Keith Creek Greenway and S. Main Street Corridor are classified as disadvantaged and are plagued by several Environmental Justice issues, which can be directly attributed in part to the presence of contamination from brownfields and other nearby hazardous substance sites. This is supported by Census Tract and EJScreen Data along with the prior referenced Target Area studies.

(3)(a) *Identification of Environmental Justice Issues*: Three priority Environmental Justice issues in the Target Areas due to brownfields and the resulting disinvestment include: (1) Lack of safe housing. The housing stock in the Target Area is some of the oldest in town and is in close proximity to historic industry with legacy contamination. Additionally, the deteriorating homes contain lead paint and asbestos that contribute to high occurrences of asthma. (2) Lack of entrepreneurship development resources. High unemployment and minority rates are present in both Target Areas. When combined with a reduced English speaking capacity and less than a high school education; these attributes continue to contribute to chronic low income due to resident's inability to secure well-paying jobs or to build entrepreneurial opportunities. (3) Lack of nearby commercial services. Brownfields have reduced property values and discouraged private investment in the Target Areas forcing residents to travel far for basic needs.

(3)(b) *Advancing Environmental Justice*: The City of Rockford recognizes that redeveloping brownfields is a key solution to Environmental Justice issues and that a new assessment grant will serve as the foundation to revitalization and private reinvestment. We will continue to promote its ongoing environmental justice efforts using this grant funding by: (1) Collaborating with community partners to address environmental and health-related challenges; (2) Working with our community partners and neighborhood leaders to enhance the understanding of environmental and health-related issues at the community level; (3) Providing accessible and culturally appropriate opportunities for low-income, minority and linguistically isolated stakeholders to meaningfully participate in decision-making processes on brownfields sites; and (4) Pursuing redevelopment of brownfield sites so the end use may fill a critical service gap. Most recently, our prior Assessment grant was utilized on a City-owned former dry cleaning and gas station site that is now being developed into Think Big, a small business incubator

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that helps minority and women-owned businesses break through startup barriers and find success. By growing sustainable small and minority-owned businesses, we are creating financial stability for those living in disadvantaged areas, building generational wealth, and encouraging local reinvestment.

**2.b. Community Engagement**

**2.b.i. and 2.b.ii. Protect Involvement and Project Roles:** As presented, Rockford has assembled a diverse group of stakeholders that will be involved to ensure the City’s brownfields redevelopment initiatives support Environmental Justice efforts and improve our underserved areas.

<b>Organization</b>	<b>Point of Contact</b>	<b>Involvement/Roll</b>
Region 1 Planning Council/N. Illinois Land Bank	Michael Dunn Jr <a href="mailto:MDunn@r1planning.org">MDunn@r1planning.org</a> 815.209.4269	<ul style="list-style-type: none"> <li>• Assist with identifying sites and prioritization</li> <li>• Identify and apply for leveraged project funds</li> <li>• Work with Land Bank for key site acquisitions</li> </ul>
Winnebago County Health Department	Todd Marshall <a href="mailto:TMarshall@wchd.org">TMarshall@wchd.org</a> 815.720.4118	<ul style="list-style-type: none"> <li>• Assist in identifying exposure pathways to contaminants and evaluate health impacts</li> <li>• Educate residents on exposure prevention</li> </ul>
Southwest Ideas for Today & Tomorrow (SWIFTT)	Rudy Valdez [REDACTED] 815.520.6022	<ul style="list-style-type: none"> <li>• Identify key services needed to support residents and businesses. Attract/retain business and services to brownfield redevelopment areas</li> </ul>
Rockford Regional Hispanic Chamber of Commerce	Sully Cadengo <a href="mailto:sullyrrhcc@gmail.com">sullyrrhcc@gmail.com</a> 779.203.3570	<ul style="list-style-type: none"> <li>• Improve communications and build trust with Latino and people of color populations in brownfield redevelopment areas.</li> <li>• Prioritize sites where redevelopment can grow and support minority-owned businesses.</li> </ul>
Keith Creek Neighborhood Group	Denny Rich [REDACTED] 815.262.3184	<ul style="list-style-type: none"> <li>• Provide resident outreach and assist with assessment and cleanup prioritization in the Keith Creek Greenway.</li> </ul>

**2.b.iii. Incorporating Community Input:** Rockford utilizes a diverse communications platform to inform residents and stakeholders of its brownfields related activities. A Brownfields Revitalization webpage is updated weekly and details all of the City’s efforts, including accomplishments, active projects, and community engagement and feedback opportunities. Project updates are also posted to the City’s social media pages, which has become a key communication tool that helps to overcome language barriers. We recognize that social media is often ineffective for communicating with older, marginalized, and disconnected residents and have found that in-person updates made at the meetings of the City’s 10 active neighborhood groups and monthly Alderman ward meetings are most beneficial. Finally, the City utilizes a hired Neighborhood Specialist for a “boots on the ground” approach for engaging disconnected residents. The goal of this position is to build and nurture trust and relationships with residents through a trauma-informed, diversity/equity/inclusion-focused approach with direct and repeated outreach.

**3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURE PROGRESS**

**3.a. Description of Tasks/Activities and Outputs:** We recognize the value of assessing and cleaning up brownfields and employs a full-time Brownfields Redevelopment Specialist (BRS) to manage our Brownfields Redevelopment Initiative.

<b>Task 1 – Programmatic Activities</b>
<p><b>i. Project Implementation:</b> The BRS will prepare and submit a project work plan, quarterly grant reports and ACRES property profiles, annual MBE/WBE and Federal Financial reports, and a final grant closeout report. The BRS will work with the City’s Sr. Financial Analyst to advertise and procure a qualified environmental professional (QEP) for the project. The BRS will update the running brownfields inventory to reflect new sites and remove others due to cleanup. The inventory is available to the public as a layer on the City’s open data site <a href="https://rockford-il.tolemi.com/">https://rockford-il.tolemi.com/</a>. The BRS will work with the City Legal Department to use its brownfields prevention ordinances to induce owners of contaminated properties to assess and/or cleanup. The BRS will review and approve all contractor invoices for payment through the City’s Accounts Payable Department. Grant draws will be completed by the City’s Grants Accountant quarterly. These activities will be in-kind. Grant funded items in Task 1 include the City’s BRS attending two future National Brownfields Conferences.</p>
<p><b>ii. Anticipated Project Schedule:</b> We anticipate the project to span the 4-year life of the grant. A project work plan will be completed within 30 days of Notice of Award. Once a Cooperative Agreement is executed, advertising and procurement of QEP will take place by 12/31/2024. Quarterly Reports, Property Profiles, and grant draws will be submitted within 30 days after each FY quarter. Annual MBE/DBE and Financial Reports will be completed by 10/31 of each FY.</p>
<p><b>iii. Task/Activity Lead:</b> City Staff as specified in Task 1, Section i. above.</p>

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<p><i>iv. Outputs:</i> The City's brownfields inventory will remain up to date. Quarterly Reports and Property Profiles will be updated and submitted via US EPA's ACRES. DBE and Federal Financial reports will be submitted annually. Two National Brownfields Conferences will be attended by the City's BRS.</p>
<p><b>Task 2 – Community Engagement</b></p>
<p><i>i. Project Implementation:</i> The City's BRS will maintain the Brownfields Revitalization website, generate social media updates, and present status updates at neighborhood and alderman ward meetings. The BRS will work directly with the City's Neighborhood Specialist to provide program updates and seek input at street-level to reach disconnected individuals. All community engagement will be completed as in-kind and not charged to the grant. Community engagement of residents and stakeholders in combination with the City's brownfields inventory and Comprehensive Plan will be used to prioritize sites.</p>
<p><i>ii. Anticipated Project Schedule:</i> Comprehensive Community Engagement is constant for the City's brownfields program and doesn't stop/start for specific grants. Specific updates for the Target Areas will be provided to all residents when assessment or cleanup milestones occur.</p>
<p><i>iii. Task/Activity Lead:</i> City Staff as specified in Task 2, Section i. above.</p>
<p><i>iv. Outputs:</i> The City's Brownfields Revitalization website will remain up to date. At a minimum, two in-person neighborhood/business group meetings will be attended and two social media posts will occur per month throughout the life of the grant. Street level outreach will continue in the Target Areas and in the vicinity of newly identified sites.</p>
<p><b>Task 3 – Eligibility Determinations and Phase I Environmental Site Assessments</b></p>
<p><i>i. Project Implementation:</i> Once prioritized, Eligibility Determinations (EDs) will be submitted to US EPA for Hazardous Substance sites and the Illinois EPA for Petroleum Sites. To preserve funding for valuable Phase I and II ESAs, the City's BRS will prepare and submit all EDs. Once a site is deemed eligible, the City's QEP will perform the Phase I ESA using grant funds, which will be prepared in accordance with the ASTM E1527-21 standard, demonstrating that the All Appropriate Inquiry has been met. The Phase I ESAs will identify Recognized Environmental Conditions (RECs) that warrant sampling through a Phase II ESA.</p>
<p><i>ii. Anticipated Project Schedule:</i> EDs and Phase I ESAs will be ready to commence by 1/1/2024 and will be completed throughout the life of the grant.</p>
<p><i>iii. Task/Activity Lead:</i> The City BRS will complete all EDs and the QEP will complete all Phase I ESAs.</p>
<p><i>iv. Outputs:</i> We anticipate an output of 25 EDs and 25 Phase I ESAs.</p>
<p><b>Task 4 – Phase II Environmental Site Assessments</b></p>
<p><i>i. Project Implementation:</i> An active US EPA Quality Assurance Project Plan (QAPP) is maintained as a result of the City's other US EPA Grants, which establishes standard operating procedures for media sampling and laboratory analysis. A significant costs savings occurs with being able to update an existing QAPP for a project instead of creating a new one. Once approved by US EPA for this project, a Phase II ESA may be completed to sample soil, groundwater, soil gas, or building materials that were identified as RECs in the Phase I ESAs. A US EPA approved Health &amp; Safety Plan (HASP) and a site Sampling and Analysis Plan (SAP) must also be completed before a Phase II ESA. The QAPP update, HASP, SAPs, and Phase II ESAs will be completed using grant funds.</p>
<p><i>ii. Anticipated Project Schedule:</i> Completion and submittal of a QAPP and HASP by 3/1/2024. SAPs and Phase II ESAs to commence immediately upon US EPA's approval of the QAPP and HASP and will be carried out throughout the life of grant.</p>
<p><i>iii. Task/Activity Lead:</i> The City's QEP will complete the QAPP update, HASP, SAPs and Phase II ESAs.</p>
<p><i>iv. Outputs:</i> An updated QAPP and HASP will be completed in accordance with grant requirements. A total output of 12 Phase II ESAs are projected for the project (6 priority sites and 6 additional sites).</p>
<p><b>Task 5 – Cleanup Planning</b></p>
<p><i>i. Project Implementation:</i> Phase II Sites with contamination will be enrolled in the Illinois EPA's voluntary cleanup program, the Site Remediation Program (SRP). Once a site has been assessed per SRP protocol, a Remediation Objective Report and Remedial Action Plan (ROR/RAP) outlining the proposed cleanup methods and technologies will be submitted. For sites not requiring physical cleanup, a Remedial Action Completion Report (RACR) may be combined with the ROR/RAP signifying all cleanup standards are met. The SRP is a fee-based program, where the Illinois EPA charges at an hourly rate for regulatory report reviews and communications by an assigned project manager. ROR/RAP and SRP project management fees will be charged to the grant.</p>
<p><i>ii. Anticipated Project Schedule:</i> Upon completion of site assessment activities, we anticipate the first ROR/RAP to be submitted by 7/1/2024, with the remaining reports spanning the life of the grant.</p>
<p><i>iii. Task/Activity Lead:</i> The City's QEP will complete and submit the ROR/RAPs. The Illinois EPA will perform report reviews and other SRP oversight. If contaminated sites are identified where there may</p>

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be an exposure risk to residents, the City's BRS will work with the Winnebago County Health Department for health monitoring and education as in-kind services.

iv. Outputs: We estimate 5 sites will be enrolled in the SRP and receive ROR/RAPs.

**3.b. Cost Estimates:** The following table outlines the proposed budget costs, with estimates based on the typical costs incurred while managing 7 prior US EPA Assessment Grants.

Budget Categories		Task 1 Prog. Activities	Task 2 Com. Engagement	Task 3 Phase I ESA	Task 4 Phase II ESA	Task 5 Cleanup Plan	TOTAL
Direct Costs	Personnel	-	-	-	-	-	-
	Fringe Ben.	-	-	-	-	-	-
	Travel	\$3,000 <sup>a</sup>	-	-	-	-	\$3,000
	Equipment	-	-	-	-	-	-
	Contractual	-	-	\$75,000 <sup>b</sup>	\$307,000 <sup>c</sup>	\$100,000 <sup>d</sup>	\$482,000
	Other	-	-	-	-	\$15,000 <sup>e</sup>	\$15,000
Tot. Direct Costs		\$3,000	-	\$75,000	\$307,000	\$115,000	\$500,000
Indirect Costs		-	-	-	-	-	-
Total Budget		\$3,000	-	\$75,000	\$307,000	\$115,000	\$500,000

<sup>a</sup>cost includes travel and lodging for the City's BRS attending 2 National Brownfields Conferences

<sup>b</sup>cost includes 25 Phase I ESAs being completed at an average cost of \$3,000 per site (\$75,000 total)

<sup>c</sup>cost includes \$5,000 for an updated QAPP and \$2,000 for HASP (\$7,000 total). An estimated \$180,000 is budgeted for Phase II ESAs for the 6 sites (\$30,000 ea.) and \$120,000 for 6 additional sites (\$20,000 each)

<sup>d</sup>cost includes 5 sites enrolled into Illinois EPA SRP with ROR/RAP reports for \$20,000 per site (\$100,000 total)

<sup>e</sup>Illinois EPA SRP project management and regulatory oversight fees for 5 sites at \$3,000 per site (\$15,000 total)

**3.c. Plan to Measure and Evaluate Environmental Progress and Results:** Activity for each proposed task under this grant will be reported in Quarterly Reports via ACRES. For sites with Phase I or II ESAs or Cleanup Planning, activities and funding will be incorporated into individual ACRES property profiles. Key metrics for this grant will be a decline in brownfields in the City's inventory, total number of Phase I and II ESAs, and total sites enrolled in the SRP with ROR/RAP reports, setting the next stage for cleanup.

#### 4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

##### 4.a. Programmatic Capability

4.a.i. – 4.a.iv: Organizational Capacity, Structure, Key Staff, and Acquiring Additional Resources: Since 2000, the City of Rockford has demonstrated its ability to simultaneously manage \$13.4 million in US EPA Assessment, Cleanup, and Revolving Loan Fund grants along with a diverse set of leveraged State and Federal funds. Rockford recognizes the value of addressing brownfields, and employs **Robert Wilhelmi** as the City's full-time Brownfields Redevelopment Specialist (BRS) to maintain an aggressive approach. Mr. Wilhelmi oversees the programmatic, administrative, and financial requirements of all brownfield grant projects. Prior to leading the City's efforts, Mr. Wilhelmi worked as a private Environmental Consultant and spent 15 years working with municipal brownfield grant programs. Mr. Wilhelmi's additional responsibilities include community engagement, grant reporting, budget management, and working with the procured Qualified Environmental Professional (QEP). Mr. Wilhelmi will work with **Michaela Harris**, the City's Contracts & Grants Compliance Officer to implement the City's overall Grants Policy and to monitor compliance with grant conditions. Ms. Harris also serves as the City's Equal Opportunity Compliance Officer and administers the City's Minority and Women Business Enterprise certification process. Ms. Harris will work with Mr. Wilhelmi to connect DBEs to available contract work to comply with the EPA's DBE Program for procurement activities. Sr. Financial Analyst **Dajana Glisic** from the Finance Department will work with Mr. Wilhelmi to advertise and procure a QEP for the project and any additional contract work exceeding \$10,000. Grant draws will be completed by **Susan Peterson**, the City's Grants Accountant. **Barb Chidley**, the City's Neighborhood Specialist, will assist Mr. Wilhelmi with community outreach and engagement by taking a "boots on the ground" approach for engaging disconnected residents. The goal of this position is to build and nurture trust and relationships with Rockford residents through a trauma-informed, diversity/equity/inclusion-focused approach with direct and repeated outreach. One of Mr. Wilhelmi's first actions as the City's BRS was developing and passing two brownfields prevention ordinances that are now used to force cleanup of impacted sites by a responsible party. Mr. Wilhelmi will continue to work directly with City Code Enforcement to cite properties and carry through the code adjudication process until compliance occurs.

##### 4.b. Past Performance and Accomplishments

4.b.i. Currently Has or Previously Received an EPA Brownfields Grant: The City of Rockford currently has no active US EPA Brownfields Assessment or Cleanup Grants. The City maintains an active RLF Program with a current value of \$6.5 million in available RLFs and Program Income that are fully committed to

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the Colman Yards project. All grants were managed in a manner consistent with the protocol proposed in this application. In addition to the active grants, Rockford has successfully managed 8 prior US EPA Assessment Grants, 7 prior Cleanup Grants, and a prior Pilot RLF Program grant.

**(1) Accomplishments:** A total of 20 sites were assessed as part of the City's most recent FY2019 Assessment Grant, with 14 Phase I ESAs, 9 Phase II ESAs, and 2 NFR Letters from the Illinois EPA as a result of Cleanup Planning and leveraged funds. Our capacity to leverage a diverse portfolio of grant funds for a successful redevelopment project has been shown repeatedly by the completion of several successful projects, most notably the \$25.5 million UW Heath Sports Factory and the \$85 million TAPCO/Embassy Suites Riverfront Hotel, each of which used Assessment, Cleanup, and RLFs. Recently, Rockford has found success in using its brownfields to fill key service gaps. Most recently, redevelopment commenced on the City's highest priority site, the former Barber Colman manufacturing campus. Renamed Colman Yards, the \$430 million live-work-play mixed use development includes the adaptive reuse of 9 historic buildings and new construction on over 25 acres of brownfields that have been assessed and cleaned up, in part, with US EPA Assessment, Cleanup, and RLF grant monies. Rockford has also demonstrated the use of Assessment Funds to redevelop brownfields into critical service gaps. In 2019, Assessment funds were used to perform a Phase I ESA on a former box store and automotive repair facility in order to move forward with acquisition. Once remodeled, Rockford's Family Peace Center will move in as a permanent home. A 501c3 multi-agency, multi-disciplinary service, the center will be a one-stop resource for victims of domestic violence, a problem plaguing our community. Additionally, Assessment Grant Funds were used to perform Phase I and II ESAs on a former dry cleaner and filling station site. Since no contamination was found, the City acquired the property and has partnered with Think Big to construct a business incubator that helps minority- and women-owned businesses break through barriers and find success. All project accomplishments are tracked in ACRES.

**(2) Compliance with Grant Requirements:** Compliance with work plans, project schedules, and terms and conditions of current or past grants has not been an issue as a result of the team of employees assigned for grant compliance. The City's Contracts & Grants Compliance Officer works directly with the BRS to ensure that administrative, programmatic, and other requirements are met. In 2019, as part of an annual external audit funded by the City, the procured audit firm found the City's past brownfield grants to be in compliance. Additionally, a US EPA external audit completed in January 2020 for a FY2016 Assessment Grant and the active RLF Program was also found to be in compliance with US EPA requirements. All quarterly and annual reports for active grants are submitted and in compliance. Grant budgets are tracked internally and by ACRES via quarterly reporting and updated concurrently with property profiles. Unexpected and expected results are always incorporated into quarterly reports. However, in some cases uncontrollable economic and other circumstances occur that may delay reaching certain milestones proposed in grant work plans. Most recently, the COVID-19 pandemic and associated shut downs delayed many brownfields grant funded work. The assigned EPA Project Manager was updated as soon as it appeared that a milestone would not be achieved as proposed in the work plan. Amendments were made when necessary and task updates were incorporated into quarterly reports.

**With no current Assessment Grant funds, the City is in dire need of new funding to continue our valuable work in our most underserved areas. For closed EPA grants, no significant left over funds have been returned by the City of Rockford.**

<sup>1</sup> US Census Bureau (July 2022). 2022 Vintage Year Estimates. <https://www.census.gov/quickfacts/>

<sup>2</sup> Illinois Department of Employment Security (1969 – 2000). Total Employment by SIC industry.

<sup>3</sup> US Bureau of Labor Statistics (August 2023). \*24,500 workers = 16.7% of total workforce

<sup>4</sup> Region 1 Planning Council and Lakota Group. (December 2022). Keith Creek Corridor Study

<sup>5</sup> US EPA Office of Brownfields and Land Revitalization (October 2020). Southwest Rockford Neighborhood Brownfields Revitalization Framework.

<sup>6</sup> US EPA Office of Research and Redevelopment. (April 2022). Southwest Rockford Revitalization Rapid Health Impact Assessment.

<sup>7</sup> City of Rockford. (October 2023). City of Rockford 2040 Comprehensive Plan

<sup>8</sup> US Census Bureau (Apr 2010/2020). 2010/2020 Census Data.

<https://www.census.gov/quickfacts/rockfordcityillinois>

<sup>9</sup> *Property taxes by state: Highest to lowest.* Property Taxes By State: Highest To Lowest | Rocket Mortgage. (2022, June 2). Retrieved Nov. 7, 2023, <https://www.rocketmortgage.com/learn/property-taxes-by-state>

<sup>10</sup> Centers for Disease Control and Prevention. (2020, March 9). Life expectancy data viz. CDC and Prevention. Retrieved November 9, 2023, from <https://www.cdc.gov/nchs/data-visualization/life-expectancy/index.html>